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St Edward Homes Limited

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1620006465

TESCO OSTERLEY, SYON LANE, ISLEWORTH REPLACEMENT ENVIRONMENTAL STATEMENT: NON- TECHNICAL SUMMARY

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1. INTRODUCTION

1.1 Purpose of Non-Technical Summary

This is the Replacement Non-Technical Summary (NTS) of the Environmental Statement (ES) which has been prepared by Ramboll UK Limited ('Ramboll') and a team of technical specialists in accordance with the statutory procedures set out in The Town and Country Planning (Environmental Impact Assessment) Regulations 2017¹ (hereafter referred to as the 'EIA Regulations').

An outline planning application was submitted in September 2020 (the 'September 2020 application') by St Edward Homes Limited the 'Applicant') for the proposed residential-led, mixed-use development (the 'proposed development') of the Osterley Tesco site located on Syon Lane, Isleworth, TW7 5NZ (the 'site'). The application was accompanied by an ES (the 'September 2020 ES') which reported on the outcomes of the EIA undertaken of the proposed development and comprised the following documents:

- Non-Technical Summary;
- Volume 1: Environmental Statement Main Report;
- Volume 2: Townscape, Visual and Heritage Impact Assessment; and
- Volume 3: Technical Appendices.

Since the submission of the application, post-submission consultation has been undertaken with the LBH and relevant statutory and non-statutory consultees. Feedback was provided in respect of key aspects of the proposed development's design. As a result of the consultation feedback, the proposed development has been amended in respect of delivering an alternative option for the incorporation of a bus route through the site; minor amendments to three blocks; an amended Energy Strategy to utilise more sustainable methods of heating and ventilation; commitments in respect of the non-residential floorspace; minor changes to the housing mix; and minor updates to the parameter plans (the 'amended proposed development'). Accordingly, updated parameter plans, an updated design code and an updated development specification has been submitted.

In addition, additional assessments and driver delay and bus delay modelling have been requested by LBH and consultees in respect of Kew Gardens, and pedestrian and cycle crossing design options for Gillette Junction, respectively.

Updated environmental impact assessments have been undertaken to assess the potential impacts and likely effects of the proposed amendments and of the amended proposed development as a whole. The outcomes of these assessments, have been presented in an Volume 4: Environmental Statement Addendum (the 'January 2021 ES Addendum').

The January 2021 ES Addendum should be read alongside the September 2020 ES.

This Replacement NTS presents a full update and replacement of the NTS submitted as part of the September 2020 ES.

This Replacement NTS presents a summary of the main findings of the EIA that has been undertaken of the amended proposed development as a whole and that has been reported in the September 2020 ES and January 2021 ES Addendum. The Replacement NTS provides:

- a description of the site and surrounding context;
- an outline of the main development alternatives considered by the Applicant and an indication of the main reasons for their choice, taking into account the potential environmental effects;
- a description of the amended proposed development; and
- a summary of the likely significant environmental effects predicted and key mitigation measures (as relevant).

¹ Secretary of State, 2017. The Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2017. HMSO.

The aim of the Replacement NTS is to summarise the main findings of the EIA in a clear and concise manner to assist the public in understanding what the likely significant environmental effects of the amended proposed development are likely to be.

1.2 Replacement NTS Approach

To aid the reader in understanding what text, figures and tables of the September 2020 NTS have been amended and/or replaced, where amendments to an original technical assessment have been considered necessary as a result of the proposed amendments and additional assessments requested, these have been highlighted in the text as follows:

- Deleted text is shown as strikethrough red text (e.g. ~~proposed development~~);
- Replacement or new text is shown as underlined blue text (e.g. proposed development);
- Where the content of a table has changed, but it is considered useful to show a direct comparison with the original text, the Table title is identified by the addition of the letter A, i.e. Table 2.1A; and
- Where a paragraph, figure image or table has been replaced in full, the new paragraph, Figure or Table title is identified by the addition of the letter R, i.e. Table 2.1R.

1.3 Viewing the ES and Application

The full Environmental Statement (ES) comprises:

- Replacement Non-Technical Summary;
- Volume 1: Environmental Statement Main Report;
- Volume 2: Townscape, Heritage and Visual Impact Assessment;
- Volume 3: Technical Appendices;
- Volume 4: Environmental Statement Main Report Addendum;
 - Volume 1A: Environmental Statement Main Report Addendum;
 - Volume 2A: Townscape, Heritage and Visual Impact Assessment Addendum; and
 - Volume 3A: Technical Appendices Addendum.

The full ES, together with the planning application and other supporting documents are available for viewing on the LBH's website.

CD versions of the full ES are available for purchase from Ramboll:

Ramboll
240 Blackfriars Road
London, SE1 8NW
Tel: 0207 808 1499

1.4 Commenting on the Application

Comments on the planning application should be forwarded to the LBH at:

London Borough of Hounslow
Hounslow House
7 Bath Road
Hounslow
Middlesex, TW3 3EB

Tel: 020 8583 5555

Email: planningcomments@hounslow.gov.uk

2. ENVIRONMENTAL IMPACT ASSESSMENT

2.1 EIA Process and Methodology

[This Replacement NTS reports on the findings of the EIA undertaken of the amended proposed development.](#)

EIA is a process that identifies the potential significant environmental effects (both beneficial and adverse) of a development and proposes mitigation to avoid, reduce and offset any likely significant adverse environmental effects. It is an iterative process which proactively seeks to integrate mitigation within the development proposals so as to avoid significant effects from arising.

The EIA process adopted for the [amended](#) proposed development has followed best practice guidelines, as set out by the Institute of Environmental Management and Assessment (IEMA) Quality Mark scheme. The process involved the following key steps:

- Consultation with LBH officers and key stakeholders;
- Collection, use and assessment of the most up-to-date baseline information and likely evolution of that baseline without the development or in the future, including the identification of sensitive receptors;
- Scoping of the EIA and ES technical assessment content and assessment methodologies;
- Integration of mitigation measures within the emerging proposals;
- Interpretation of the schedules, parameters and commitments presented in the parameter plans, design code and development specification, as well as the formulation of assumptions in the absence of information, as the basis for the individual technical assessments;
- Use of relevant guidance and good practice methods to predict the nature, scale and significance of environmental effects; and
- Reporting of the results of the EIA within the ES in a transparent way, to provide the information required to inform the decision-making process.

2.2 EIA Scoping

An EIA Scoping Report was submitted to the LBH on 31 July 2019 (LBH Ref: 01106/B/SCOPE1) in support of a request for a formal EIA Scoping Opinion pursuant to Regulation 15(1) of the EIA Regulations. The EIA Scoping Report sets out a description of the emerging proposed development; the potential key environmental impacts and likely effects to be considered as part of the EIA; as well as the proposed approach that would be adopted for the EIA including the proposed scopes and assessment methodologies to predict the scale of effects and to assess the significance in each case.

The LBH issued an EIA Scoping Opinion on 13 September 2019. The EIA Scoping Opinion confirmed the scope of the EIA as proposed in the EIA Scoping Report, with no requests for additional technical assessment chapters to be included in the ES.

A clarification letter was issued to the LBH on 18 November 2019 in respect of the EIA Scoping Opinion to confirm the submission deliverables and the interface with the EIA. This letter also confirmed an increase in the flexible retail, leisure, community (Use Class A1-A3, B1, D1 and D2) floorspace of the proposed development and confirmed that the change would have no effect on the scope of the EIA or ES as described in the EIA Scoping Report.

This was followed in May 2020 by email correspondence and a conference call with LBH officers (20 May 2020) to confirm the EIA and ES scope for the proposed development, including outlining further minor changes to the proposed development and no effect on the scope of the EIA and ES as described in the EIA Scoping Report.

2.3 Topics Included in EIA

As identified in the EIA Scoping Report, the following environmental topics were 'scoped in' and assessed within the EIA and are presented as technical assessment chapters within the ES:

- Socio-Economics;
- Transport and Accessibility;
- Air Quality;
- Noise and Vibration;
- Wind Microclimate;
- Daylight, Sunlight and Overshadowing;
- Townscape and Visual; and
- Built Heritage.

2.4 Topics Excluded in EIA

As identified in the EIA Scoping Report, the following environmental topics were 'scoped out' of the EIA:

- Ground Conditions;
- Water Resources and Flood Risk;
- Archaeology;
- Ecology;
- Climate Change;
- Major Accidents and Disasters;
- Aviation;
- Health and Wellbeing;
- Solar Glare;
- Light Spill; and
- Waste.

Whilst it is not expected that ground conditions, ecology, water resources and flood risk and archaeology would give rise to significant environmental effects, the following environmental technical reports were prepared to inform the design process and to integrate mitigation measures within the development proposals where appropriate, and form part of the ES technical appendices:

- Geo-Environmental Assessment (Ground Conditions, including contamination);
- Ecological Impact Assessment;
- Flood Risk Assessment; and
- Historic Environment Assessment (Archaeology).

2.5 Assessment Approach

The EIA has considered the likely significant environmental effects during demolition and construction works and once the proposed development is complete. Each technical assessment has considered different types of effects including direct effects and any indirect, secondary, cumulative; short, medium and long term; permanent and temporary; beneficial, neutral and adverse effects.

The EIA has been based on the parameter plans, design code and development specifications ([and associated Addendum documents](#)) as described in ES Volume 1, Chapter 4: Proposed Development Description and Chapter 5: Demolition and Construction Description, [as well as ES Volume 4](#).

Each of the 'scoped in' environmental topics have been addressed in separate technical assessment chapters in ES Volumes 1 and 2. Supplementary reports and details are presented in ES Volume 3 as

technical appendices, [as well as ES Volume 3A](#). In each technical assessment chapter, a description of the assessment methodology is given together with the existing and future site conditions.

EIA considers the sensitivity of the receptor and the magnitude of the impacts from a development to predict the scale and nature of the resulting effect on the environment.

Mitigation is the term used to refer to the process of avoiding where possible and, if not, minimising and/or controlling the likely significant adverse effects of a development on the environment. Mitigation measures have been integrated (embedded) into the design stage; the demolition and construction stage; or the activities associated with the operation of the completed proposed development (i.e. the completed development stage). The need for additional mitigation measures have been identified, as appropriate.

In terms of cumulative effects, the EIA has considered the following effects as defined by the IEMA Guidance²:

- 'Inter-project' effects – incremental changes caused by other development schemes occurring together with the [amended](#) proposed development and the cumulative effects combining to worsen the effect of a particular impact; and
- 'Intra-Project' effects of different types of impacts from the [amended](#) proposed development that could interact to jointly affect a particular receptor/s at the site. Potential impact interactions could include the combined effects of noise and dust during construction activities on a particular sensitive receptor.

Inter-project effects are combined effects generated from the [amended](#) proposed development with other approved or existing developments ('cumulative schemes'). These cumulative schemes may generate their own individually insignificant effects but when considered together could give rise to a significant cumulative effect, for example, combined townscape and visual impacts from two or more (proposed) developments.

The following nine cumulative schemes have been considered for the purpose of the inter-project cumulative impact assessment:

1. New Horizons Court, Ryan Drive, Brentford, TW8 9EP [LBH Ref: 02912/A/PA2]
2. 4 and 8 Harlequin Avenue, Brentford, TW8 9EW [LBH Ref: 00558/4-8/P1]
3. 1 Commerce Road, Brentford, London, TW8 8LE [LBH Ref: 00297/H/P13]
4. 891 Great West Road, Isleworth London TW7 5PD [LBH Ref: 00505/891/P4]
5. 891 Great West Road, Isleworth London TW7 5PD [LBH Ref: 00505/891/P5]
6. Former Syon Gate Service Station, Land at South of Gillette Corner, Great West Road, Isleworth TW7 5NP [LBH Ref: 00505/AF/P28]
7. Sky, Sites 6 & 7, Grant Way, Isleworth TW7 5QD [LBH Ref: 00558/A/P69]
8. Bolder Academy, 1 MacFarlane Lane, Isleworth, TW7 5PN [LBH Ref: 01106/W/P9]
9. Homebase, Syon Lane, Isleworth, TW7 5QE [LBH Ref: *No reference yet*]

The location of these schemes is shown in Figure 2.1.

[Following submission of the September 2020 ES, an additional review of surrounding approved or existing developments was undertaken. No further cumulative schemes were identified for consideration within the updated environmental assessments.](#)

² Institute of Environmental Management and Assessment, 2011. The State of Environmental Impact Assessment Practice in the UK. 2011. IEMA.

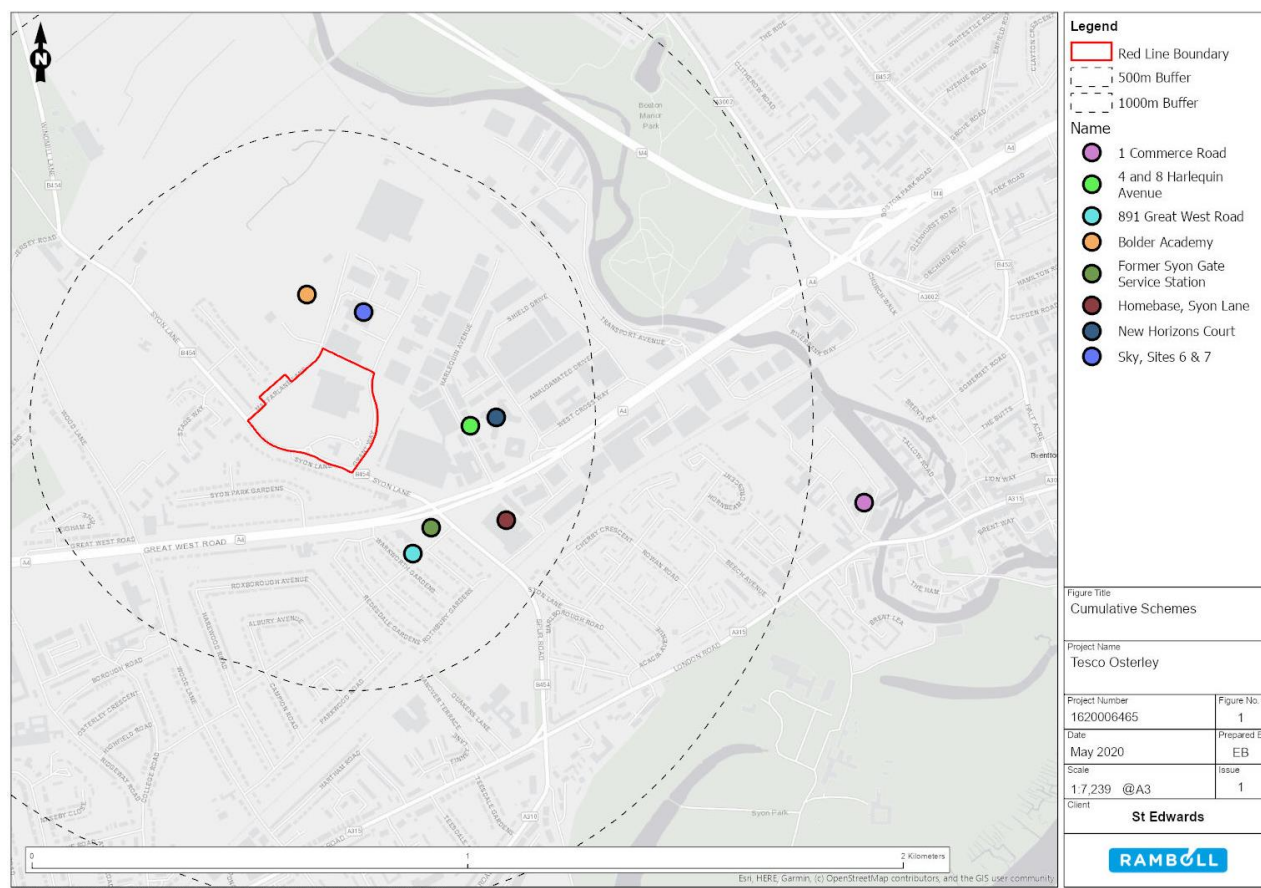


Figure 2.1: Location of Cumulative Schemes

The Applicant is submitting a separate full planning application for scheme 9, Homebase, concurrently with the [amended](#) proposed development's application. Both applications are accompanied by separate ESs. It is proposed to relocate the Tesco store on-site to the Homebase site. Although each of these schemes could technically be delivered independently, the reality is that the schemes are interdependent. The new Tesco store opening on the existing Homebase site, and the demolition of the existing Tesco store to make way for new residential development are dependent on the other respective development proceeding. There would not be two Tesco stores open for trading at the same time on these sites, and planning obligations are proposed to control this scenario and prevent this from taking place. An obligation binding the site is proposed to restrict demolition of the existing Tesco store until trading commences at the replacement Tesco store on the Homebase site. Further, an obligation binding the existing Homebase site is proposed to restrict the new store from commencing trading until trading has ceased at the existing Tesco store.

2.6 Covid-19

Assessments have made of the existing baseline conditions at the time of the [September 2020](#) ES preparation (2019 - 2020) unless otherwise stated in the technical chapter. All baseline survey work was undertaken before the COVID-19 pandemic and is therefore representative of the pre-COVID-19 situation. Follow-up site walkovers and validation surveys (only in respect of noise) have been limited by the pandemic; however, it is considered that a valid and representative set of baseline data was captured in advance of the pandemic to enable robust assessments to be undertaken.

Whilst it is widely acknowledged the COVID-19 pandemic has seen an increased prevalence of home-working and reduced traffic, noise and emissions, ~~since~~ [when](#) lockdown was lifted [in the summer of 2020, this trend](#) ~~this is~~ gradually [reversed](#) ~~reversing~~. It is not possible to predict what may change in the future, so it is considered that assessments based on the pre-COVID-19 baseline are reasonable and representative.

3. SITE AND SURROUNDING CONTEXT

3.1 Site Location

The site is located north of the A4-Great West Road at the corner of Syon Lane (B545) and Grant Way in Isleworth, TW7 5NZ (at OS grid reference TQ 1604277649), as shown in Figure 3.1.



Figure 3.1: Site Location

The site boundaries are defined to the:

- north-west by MacFarlane Lane, beyond which is Goals Gillette Corner Sportfields (including Goals Gillette Corner Football Academy football pitches and Sky's football area), the site of the proposed Bolder Academy and Wyke Green Golf Course;
- north-east by the Sky Isleworth Campus comprising 11 large scale headquarter, studio and playout centre buildings;
- east by Grant Way, beyond which are a small area of amenity space, the Sky Isleworth Campus and the West Cross Industrial Estate, including the Gillette Building;
- south by Syon Lane (B454), beyond which are two storey semi-detached houses (nearest approximately 20 m south) and a two storey apartment block; and
- west by MacFarlane Lane, beyond which are two storey semi-detached houses (nearest approximately 25 m west).

The site's surrounding context is of a mixed nature with:

- industrial and business uses to the north;
- industrial, business, commercial and health uses to the east;

- residential, education and place of worship uses to the south; and
- residential, education and open space uses to the west.

The site is located within Great West Corridor Opportunity Area. To the north, the Sky Campus is designated as a Strategic Industrial Location (SIL). To the north-west of the site, Goals Gillette Corner is designated as Metropolitan Open Land.

3.2 Site Description

As presented by the application redline boundary in Figure 3.2, the site forms an irregular shaped parcel of land that covers an area of approximately 5.45 hectares (ha).

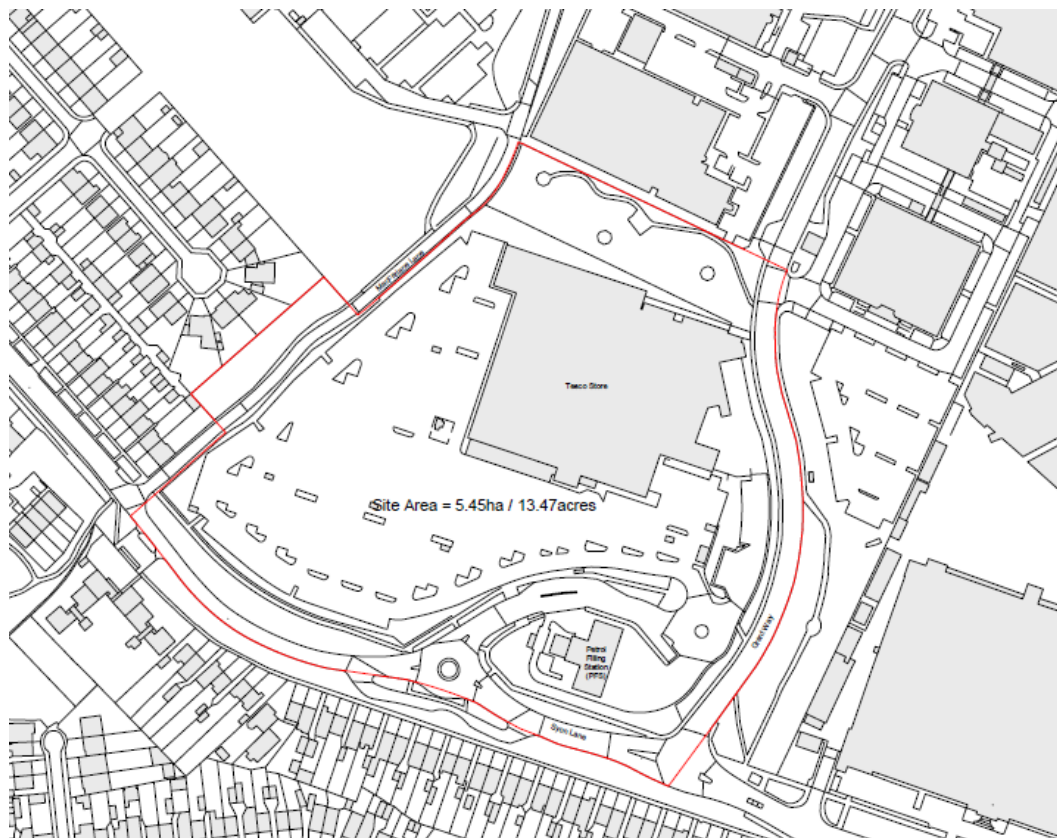


Figure 3.2: Site Redline Boundary

The site lies at an elevation of between approximately 23.1 m and 24.8 m Above Ordnance Datum (m AOD) and is generally level.

The site comprises an operational Tesco Extra store, hand car wash, petrol filling station (PFS), service yard, surface car park, and areas of open space and vegetation (shrubs and trees) fragmented throughout the car park and along the northern, eastern, southern and western site boundaries.

The Tesco store is located in the north of the site and is of modern design. It comprises a squared shaped, low-rise brick framed building with plastic and metal clad façade and a flat roof. Under normal conditions, there are 290 people employed on-site.

The PFS and service yard is located in the south-east of the site and comprises a square shaped canopy, with a small red and cream brick building, and a car wash adjacent to the east.

External hardstanding areas comprise a surfaced car park in the west, south and south-east of the site with 625 spaces and a servicing/deliveries area in the east.

The north of the site comprises a park ('Water Gardens') with amenity grassland, shrubs, trees and a pedestrian path which connects Grant Way with MacFarlane Lane. To the west of McFarlane Lane, the

site comprises a further area of fenced open space comprising areas of hard standing, bare ground, ruderal vegetation and scattered trees.

A total of 177 trees and 13 groups were surveyed on- and off-site along with several small areas of introduced shrub, none of which are protected by Tree Preservation Orders.

There are no existing basements on the site.

The site access from Syon Lane (B454) is formed by a three-arm roundabout junction, leading to an internal road, allowing for movement within the site and access to the on-site PFS station.

3.3 Environmental Sensitivities and Considerations

A selection of surrounding environmental sensitivities is shown in Figure 3.3.

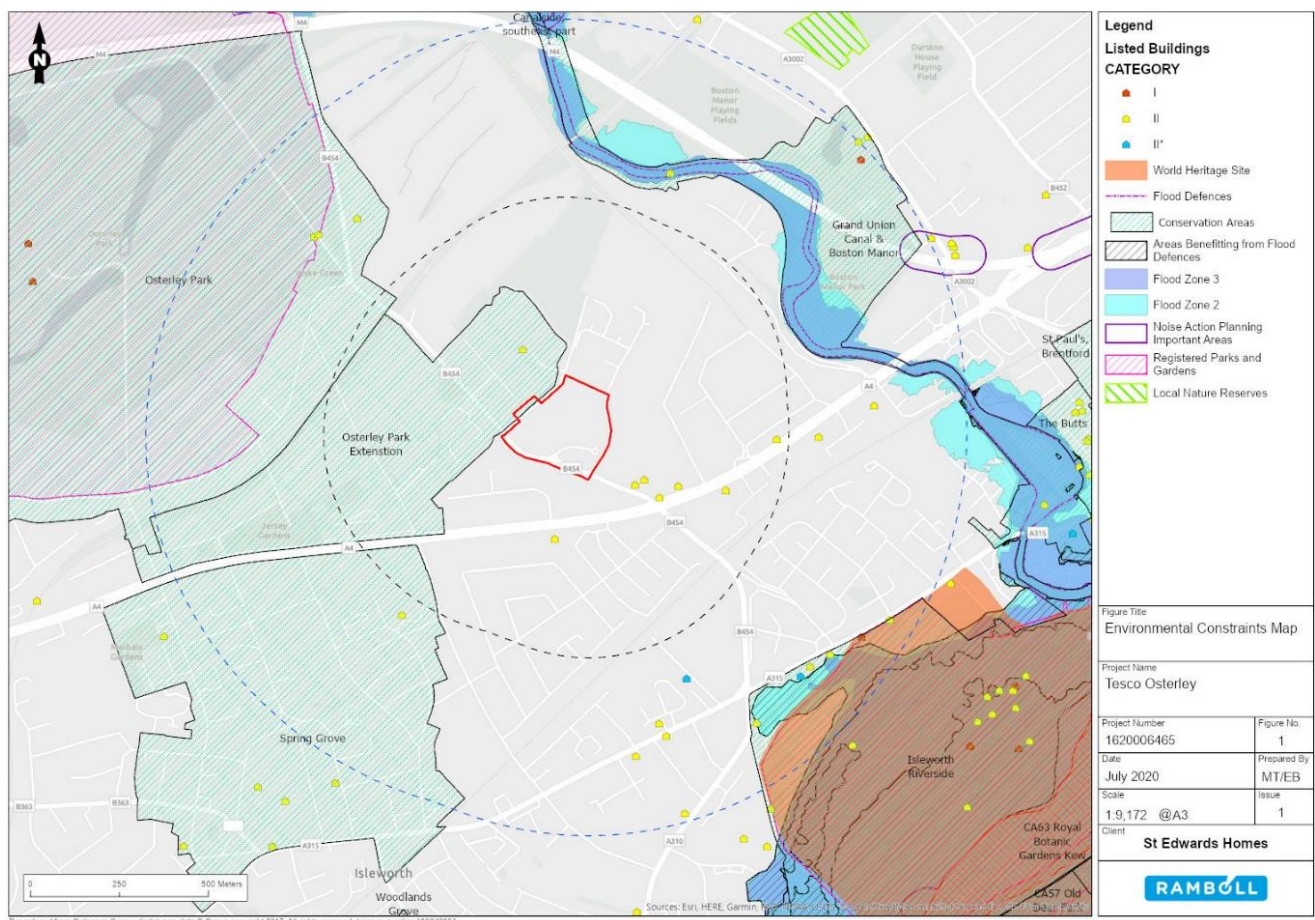


Figure 3.3: Environmental Constraints Map

The following subsections summarise the key environmental sensitivities and considerations for the site.

3.3.1 Geology and Water

The underlying geology of the area of the site is gravel overlain by brickearth.

Ground water beneath the site comprises a Principal Aquifer. The site is not located within a source protection zone (SPZ). SPZs are defined around large and public groundwater abstraction sites. The purpose of SPZs is to provide additional protection to safeguard drinking water quality through constraining the proximity of an activity that may impact upon a drinking water abstraction.

There are no surface water features on the site. The closest substantial surface water body to the site is the River Brent approximately 600 m to the north-east at its closest point.

The site is located entirely within Flood Zone 1 (Low Probability of flooding) which represents land where the Environment Agency (EA) considers the annual probability of flooding from rivers or the sea is less than 1 in 1,000 (0.1 %).

3.3.2 Ecology and Nature Conservation

There are no statutory designated ecological sites within the site. There is one Site of Special Scientific Interest (SSSI) within 2 km of the site, Syon Park SSSI, located approximately 1.5 km to the south-east. There are no Local Nature Reserves located within 1 km of the site.

The closest Site of Importance for Nature Conservation (SINC) is Osterley Park, which is a SINC of 'Borough' level importance (SBINC), located 350 m to the north-west from the site.

Arboriculture

A total of 177 trees and 13 groups were surveyed on- and off-site (total of 190). This includes six trees assigned an amenity value/quality rating of high (Category A); 36 trees and groups have been assigned a rating of moderate (Category B) and 108 trees and groups assigned a rating of low (Category C). In total 40 trees and groups were recorded as being in poor condition, to the extent that they cannot realistically be retained for the medium- to long-term (Category U).

None of the trees are protected by Tree Preservation Orders (TPOs).

3.3.3 Cultural Heritage

The site is not located within an Archaeological Priority Area (APA) as defined by the LBH.

The site does not contain any nationally designated (protected) heritage assets, such as scheduled monuments or registered parks and gardens. There are also no statutory listed buildings located within the site. The closest listed buildings are approximately 130 m north-west at the Gower Road Pavilion and Clubhouse (Grade II); 130 m south-east of the site boundary at the Gillette Building (Grade II); and approximately 230 m to the south-east of the site boundary at the National Westminster Bank (Grade II).

The north-western part of the site falls within the Osterley Park Conservation Area (CA) located immediately along MacFarlane Lane. In addition, there are five further Conservation Areas in the study area.

Syon House Garden, Osterley Park and the Royal Botanic Gardens at Kew (World Heritage Site) are Registered Historic Parks and Gardens in close proximity.

3.3.4 Townscape and Visual

Excluding the north-western part of the site which falls within the Osterley Park CA, there are no other designated or non-designated heritage assets within the site boundary. The site is not covered by any planning policy designations relating to townscape value.

The surrounding environment is characterised by urban development. Although the study area comprises primarily residential uses and the built form generally reflects this in scale, footprint and height, within the Great West Corridor (GWC) the land use is more varied, with big box/industrial, office parks side by side with post-war housing.

Built form to the north, south and west of the study area is not particularly tall. Taller buildings and structures are concentrated to the east along the M4 and A4 corridors.

3.3.5 Open Space

Wyke Green, Jersey Gardens, Boston Manor Park, Boston Manor Playing Fields and Hawthorn Hatch Playground are located within 800 m. There is a good provision of open space containing a range of

playspace and sports facilities of which Boston Manor Park is the largest. LBH designated Metropolitan Open Land is located directly north-west of the site where the Goals Gillette Corner Sportfields is situated.

3.3.6 Transport and Accessibility

Transport for London (TfL) calculate the Public Transport Accessibility Level (PTAL; 6 being the best) for the site is 2.

Syon Lane is a bus route, with bus service number H28 currently terminating at the site. In addition to servicing the site, bus service H28 serves West Middlesex University Hospital, Osterley and Hounslow, terminating at the Bulls Bridge Tesco store in Hayes. Additional bus services are accessible from the A4-Great West Road (service H91) and from the A315-London Road (services 235, 237, 267, E8 and N9). Syon Lane Railway Station is located a walk distance of approximately 450 m from the site boundary. Osterley London Underground Station operates on the Piccadilly Line, and is located an approximate walking distance of 2 km from the site. The site would benefit from the development of the Brentford to Southall Crossrail Link, which is referred to in the Great West Corridor Masterplan and Capacity Study (March 2019).

In terms of cycling, a defined off-carriageway route is provided adjacent to the A4-Great West Road. The facility provides a link to Osterley town centre to the west and Boston Manor Park and Chiswick to the east. Construction of Cycle Superhighway 9 started in 2019 with the route expected to be complete by 2021. CS9 will provide a 7 km section of cycleway between Kensington Olympia and Brentford. The new cycle superhighway would support journeys by cycle from the site towards Central London.

3.3.7 Noise and Vibration

Due to the site's urban location, noise sources affecting the site include road traffic, as well as train and aircraft movements. No notable sources of noise were observed from the adjacent strategic industrial land.

3.3.8 Air Quality

The whole of the borough has been declared an Air Quality Management Area (AQMA) for exceedances in nitrogen dioxide (NO₂) levels. Existing air quality at the site are impacted from road traffic emissions on the main road network to the south of the site.

3.3.9 Socio-Economics

The site is located within the Great West Corridor Opportunity Area in which the Intend to Publish London Plan seeks the delivery of 7,500 new homes and 14,000 new jobs. LBH's emerging Great West Corridor Local Plan Review identifies this site for residential-led mixed-use, to include a focal area containing retail frontage and public space.

As of 2019, the LBH is the 19th most deprived borough in London, and the 95th most deprived local authority in England. This represents an improvement since 2015 when it was the 17th most deprived borough and the 86th most deprived local authority in England. This is also an improvement compared 2010 as Hounslow was ranked as the 18th most deprived authority in London and the 92nd most deprived in England.

3.4 Sensitive Receptors

The following list summarises receptors that may be sensitive to potential environmental impacts as a result of the proposed development:

- Existing users of the site and surrounding area who would be present during the demolition and construction works and once the proposed development is completed;

- Future users of and visitors to the proposed development;
- Future pedestrians in and around the proposed development;
- Existing and future off-site residential properties, including those to the south and west and those within the identified future development;
- Future on-site residential properties within the completed proposed development;
- Existing and future primary and secondary schools;
- Existing healthcare facilities – GPs, Dentists;
- Existing community facilities, including leisure centres and local community centres;
- Existing open space and amenity space;
- Existing townscape character areas;
- Existing visual receptors and views from publicly accessible locations such as roads, footpaths and open spaces;
- Existing heritage assets and their setting, including listed buildings and structures, conservation areas and registered parks and gardens;
- Existing public transport services (overground rail, underground rail and bus);
- Existing and future road network;
- Existing and future pedestrians, cyclists and road users;
- Surface water features such as the River Brent;
- Ground water;
- Underlying geology and hydrology;
- Water supply and drainage infrastructure;
- Trees and vegetation within and adjacent to the site;
- Habitat and species, including those associated with the River Brent;
- Existing and future on- and off-site residential receptors;
- Hounslow Borough AQMA;
- Existing and future on- and off-site residential receptors;
- Demolition and construction workers;
- Underlying geology and hydrogeology; and
- Aquifers.

4. PLANNING CONSIDERATIONS

4.1 Policy Context

It is necessary to consider the proposed development against relevant policies and guidance at national, regional and local levels.

At the national level, planning policy is contained within the National Planning Policy Framework (NPPF)³ and the Planning Practice Guidance (PPG)⁴.

At the regional level, the EIA has been informed by the Greater London Authority's (GLA) London Plan 2016 (including January 2017 typesetting correction)⁵. Additionally, the Draft New London Plan (Intend to Publish London Plan, December 2019)⁶ ~~was considered as is due to be adopted in 2020 and is~~ a material consideration, as well as the Publication London Plan, December 2020. It is noted that the Mayor of London formerly approved the Publication London Plan on 21 December 2020 and submitted this to the Secretary of State (SoS) for adoption.

At the local level, the Hounslow Local Plan⁷ was adopted on 15 September 2015 and until 2030, forms part of the planning framework of the LBH.

As stated earlier, the site is located within the Great West Corridor Opportunity Area in which the Intend to Publish London Plan seeks the delivery of 7,500 new homes and 14,000 new jobs.

The LBH's emerging Great West Corridor Local Plan Review⁸ identifies the site for residential-led mixed-use, to include a focal area containing retail frontage and public space. The emerging Site Allocations document identifies the site for intensification of use for a wider range of uses, including residential development, with two development options. One comprises the retention of the existing store and delivery of residential homes, and the second, where the existing store is re-provided elsewhere, comprises a comprehensive redevelopment with residential use, local retail and community uses, new public open space and enhanced access and movement across the site.

A range of regional and local supplementary guidance documents are also relevant to the determination of the application and have been considered in undertaking the EIA.

4.2 Planning History

A review of online historical sources indicates that the site was developed for the MacFarlane Lang and Co Ltd. United Biscuit Factory in 1931. The factory closed in 1980. There is no documented history as to what occurred at the site between 1980 and 1993. It is understood that the park in the north of the site, Water Gardens, was developed in the 1980s.

A desk-based study of LBH's planning portal⁹ confirms that the site has a limited planning history, with the development of the existing Tesco store and petrol filling station consented in the early 1990's (01106/B/P82). Applications since then have related solely to the operational requirements of the existing use (advertisements, small extensions, jet wash, canopies, kiosks, etc); with the exception of the September 2020 application submission (P/2020/3100).

³ Ministry for Housing, Communities and Local Government, 2019. The National Planning Policy Framework. HMSO.

⁴ Ministry of Housing, Communities and Local Government, 2019. Planning practice guidance available from: <https://www.gov.uk/government/collections/planning-practice-guidance> [Accessed 30.06.2020].

⁵ Greater London Authority, 2016. The London Plan: The Spatial Development Strategy for London Consolidation with Alterations since 2011 (updated 2017). London.

⁶ Greater London Authority, 2019. Draft New London Plan (Mayor's Intending to Publish version). London.

⁷ London Borough of Hounslow, 2015. Local Plan 2015 – 2030. Volume One. London. LBH.

⁸ London Borough of Hounslow, 2017. Great West Corridor Locals Plan Review. London.

⁹ London Borough of Hounslow, 2020. Planning Search [online]. Available at: http://planning.hounslow.gov.uk/planning_search.aspx [Accessed 30.06.2020].

5. ALTERNATIVES AND DESIGN EVOLUTION

The EIA Regulations require the ES to report on the reasonable alternatives (for example in terms of design, size and scale) studied by the Applicant, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.

The ES considers the following alternatives:

- The 'Do Nothing' alternative;
- Alternatives mentioned within the Great West Corridor Draft Site Allocations Document;
- Alternative sites;
- Alternative uses; and
- Alternative Designs and Design Evolution.

5.1 Do-Nothing Alternative

The 'Do Nothing' scenario is a hypothetical alternative conventionally considered, albeit briefly, in EIA as a basis for comparing the development proposal under consideration.

Under this scenario, the site would be left in its current underutilised state, which would result in the following:

- No delivery of housing and employment opportunities in accordance with emerging planning policy objectives;
- No reduction in on-site car parking, reduction in vehicle trips and associated improvements to air quality, noise and road network capacity;
- No improvement in neighbourhood connectivity and permeability;
- No improvement in public realm or creation of open space;
- No improvement in townscape character;
- No improvement in biodiversity; and
- No improvement in respect of the sustainability of on-site uses (for example water use, carbon emissions, energy use, traffic emissions).

Furthermore, as previously stated, the site lies within the Great West Corridor Opportunity Area in which the Intend to Publish London Plan seeks the delivery of 7,500 new homes and 14,000 new jobs. No redevelopment would not achieve these policy goals.

Consequently, the Applicant ruled out the 'Do-Nothing' alternative.

5.2 Pre-Application - Alternative Sites

No alternative sites have been considered by the Applicant for the following reasons:

- The Applicant has entered into a partnership agreement with Tesco to deliver the comprehensive redevelopment of the site and therefore the Applicant did not consider alternative sites; and
- LBH's emerging Great West Corridor Local Plan Review and Draft Site Allocations document identify this site for residential-led mixed-use, to include a focal area containing retail frontage and public space.

5.3 **Pre-Application - Alternative Uses**

Within the Great West Corridor Masterplan and the Draft Site Allocations, the following two options are presented:

- Scenario 1: The Tesco store is retained on-site and part of car park is intensified with residential development; OR
- Scenario 2: The redevelopment of site as new residential quarter with complementary provision of community facilities. This would be facilitated by the relocation of the Tesco store to a nearby site.

Discussions with Tesco on the operation of their store and the aspiration for the site's redevelopment made clear that a redevelopment of the store on the site was not a feasible option due to disruption to its trade and cost. Scenario 2 would result in a more efficient use of land and deliver greater benefits in terms of public space, mixed uses and housing delivery.

5.4 **Pre-Application - Alternative Designs and Design Evolution**

The Applicant considered alternative site layouts, height and massing options. Figure 5.1 provides a snapshot of the layout options considered.

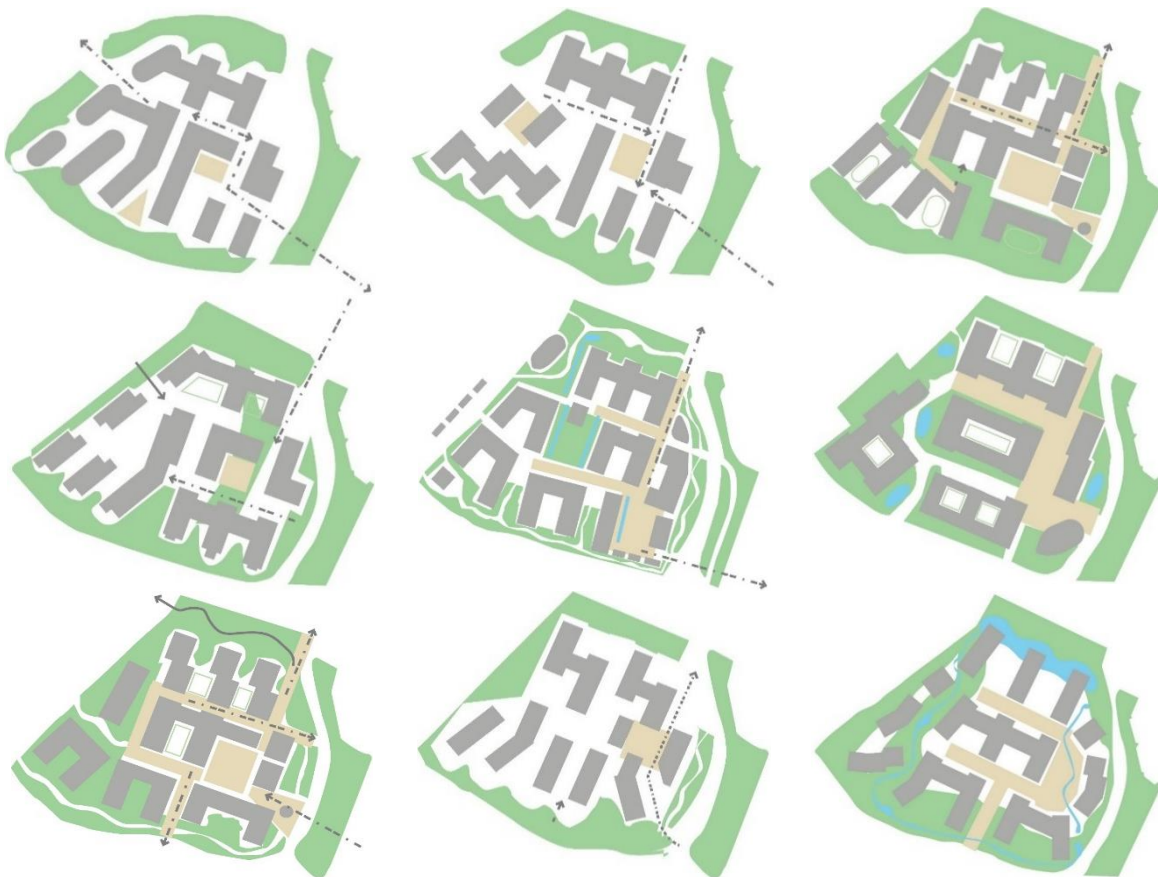


Figure 5.1: Layout Options

The main design evolution process focussed on the following:

- Layouts and orientation of the various blocks in relation to site navigation, daylight and sunlight levels and consideration of surrounding sensitive boundaries and context;
- Moving from a linear park diagonally across the site to perimeter open space permeating into and through the site;
- Enhancement of the Water Gardens located in the north of the site;
- Enhancement of connectivity, permeability and accessibility across the site and to the surroundings; and

- Alternative height and massing options to avoid and minimise significant impacts to surrounding sensitive receptors with regard to daylight and sunlight amenity, heritage significance, townscape and views.

The selected layout and height and massing options were used to select a preferred illustrative design option as shown in Figure 5.2. The illustrative scheme was used to develop the parameters for the proposed development and to inform the development specification and design code.



Figure 5.2: Potential Façade Options

5.5 Pre-Application - Alternative Façade Options

Due to the outline nature of the proposed development, alternative façade designs and materials have not been explored for this stage of the planning process. A design code has been developed to accompany the planning application for the proposed development and will inform the detailed design of the subsequent Reserved Matters Applications (RMAs). The design code seeks to ensure that the highest standard of design is delivered across the site, as individual development parcels are brought forward through a process of phased development. It also aims to ensure a consistent and coherent design approach between different parcels, maintaining the overall design approach for the wider development. Example façade options are illustrated in Figure 5.3.



Figure 5.3: Potential Façade Options

Overall, the design team's approach has been iterative, considered and comprehensive in refining the preferred options with the aim of delivering a scheme that achieves the Applicant's objectives and reduces environmental impacts. The proposed development would provide the most optimal redevelopment option for the site. The design evolution process focused on the illustrative scheme and have over time been used to inform the development parameters, development specifications and design code.

5.6 Post-Application – Minor Amendments

Since submission of the September 2020 application, a number of design amendments have been made in response to ongoing consultation feedback from the LBH and key stakeholders.

The proposed amendments comprise the following:

- Revision of the Energy Strategy to adopt a site wide heat network based on air source heat pumps and taking the opportunities to introduce PV panels on the available roof space;
- Reduction of the depth of Block J to ensure a minimum of 18 m separation to properties in Oaklands Avenue and a minimum rear garden depth of 5.6 m;
- Replacement of the 3 m shared pedestrian/cycle route along the frontage of the site with Syon Lane with a 4 m segregated cycle/pedestrian route to improve accessibility;
- Introduction of flexibility to allow for alternative options for the incorporation of the bus stops and turnaround facility with the site, either at the northern end of Grant Way as proposed in September 2020 (Bus Route Option 1) or at an alternative location within the site (Bus Route Option 2), with the final location to be agreed as part of the reserved matters details;
- Introduction of flexibility for the location of the single storey mobility hub (previously referred to as Block K) to match Bus Route Options 1 or 2 with no change to nature or scale of this building;
- Set back of the basement and ground floor of Block F out of the root protection area of the existing oak tree on Macfarlane Lane;
- Associated amendment of Parameter Plans;
- Preparation of a parameter plan to fix minimum separation distances previously presented in the design code as requested by the LBH;
- Associated update of the design code and design specification document;
- Commitment to deliver minimum floorspace amounts for groupings of uses within the non-residential floorspace to ensure the final development delivers a mix of uses (with no change to overall minimum and maximum extents of non-residential floorspace used in assessments); and
- Widening of the housing mix ranges for intermediate homes.

6. PROPOSED DEVELOPMENT DESCRIPTION

The description of the proposed development as stated on the application form is:

Outline planning permission with all matters reserved except access will be sought for:

"Demolition of existing building and car park and erection of buildings to provide residential homes, plus flexible non-residential space comprising commercial, business and service space, and/or learning and non-residential institution space, and/or local community space, and/or public house/drinking establishment, and/or a mobility hub, along with associated access, bus turning, car and cycle parking, and landscaping arrangements."

6.1 Summary of Proposed Development

The [amended](#) proposed development seeks to deliver the following:

- Demolition the existing Tesco Store and petrol filling station;
- Up to 1,677 new homes;
- Up to 5,000 m² (GIA) of non-residential floorspace, including commercial, business and service space, and/or learning and non-residential institution space, and/or local community space, and/or public house/drinking establishment, and/or a mobility hub;
- ~~A bus turning facility located off Grant Way, to include bus stand spaces and welfare facilities for drivers;~~
- [A bus turning facility located off Grant Way \(Bus Route Option 1\) or a bus route through the site \(Bus Route Option 2\) with associated bus stand spaces, bus stop and mobility hub with welfare facilities for drivers;](#)
- Up to 400 car parking spaces, including car club bays and comprising of both on-street and off-street provision;
- A minimum of 10 car club bays;
- A minimum of 20% active electric vehicle charging points, with remaining car parking spaces to be passive electric vehicle charging points;
- Long stay and short stay cycle parking in line with Intend to Publish London Plan standards;
- A minimum of 24 trees retained;
- A minimum of 300 new trees planted;
- [Site wide heat network based on air source heat pumps with PV panels on the available roof space;](#)
- A minimum of 20,000 m² of publicly accessible open space, including new public open space areas;
- A minimum of 8,000 m² of communal amenity space at podium and roof level; and
- A minimum of 5,000 m² play space split between public ground floor area and communal podium/roof levels;
- A minimum of 4,000 m² of biodiverse roofs; ~~and~~
- A new public route through the retained and enhanced Water Gardens-; ~~and~~ [and](#)
- [Replacement of the existing 3 m pedestrian and cycle route on the frontage of site with Syon Lane to provide a 4 m wide segregated pedestrian and cycle route.](#)

The [amended](#) proposed development would be delivered across ~~ten~~ [nine](#) development parcels, within ~~ten~~ [nine](#) blocks ranging in height from one to 17 storeys.

The development parameters are presented in parameter plans that accompany the application. The [updated](#) parameter plans are outlined in Table 6.1A.

Table 6.1A: Schedule of Parameter Plans		
Dwg No.	Name	Description
01754-JTP-DR-MP-PP-001	Proposed Site Levels	The proposed site levels for the site.
01754-JTP-DR-MP-PP-002	Maximum Development Parcels	Maximum extent of habitable accommodation including building articulation, balconies and awnings.
01754-JTP-DR-MP-PP-004	Predominant Ground Floor Uses	Location of a mix of residential and non-residential and residential ancillary uses at ground level.
01754-JTP-DR-MP-PP-005	Predominant First Floor Uses	Location of residential and non-residential uses at first floor level.
01754-JTP-DR-MP-PP-003	Maximum Building Heights	Maximum building heights in metres above ordnance datum (m AOD), including building parapets, rooftop plant and lift overruns.
01754-JTP-DR-MP-PP-007	Proposed Open Space at Ground Level	Maximum zones of open space at ground level.
01754-JTP-DR-MP-PP-008	Open Space at Podium Level	Maximum zones of open space at podium level including maximum heights AOD.
01754-JTP-DR-MP-PP-009	Open Space at Roof Level	Maximum zones of open space and green and biodiverse space at roof level including maximum heights AOD.
01754-JTP-DR-MP-PP-006	Access and Movement	Areas of site movement and access to be provided across the site.
01754-JTP-DR-MP-PP-010	Basement Provision	Maximum extents of basement provision for cycle storage and plant space at basement level including heights in m AOD.
01754-JTP-DR-MP-PP-011	Energy Centre Location	Zone for the proposed Energy Centre.
01754-JTP-DR-MP-PP-012	Key Minimum Distances	Minimum distances between Blocks.

6.2 Layout

Figure 6.1R shows the proposed site levels that have been developed in order to create an accessible public realm throughout the site. The proposed levels accommodate the existing fall in height from the south-west corner towards the Water Gardens to encourage drainage and utilise the proposed sustainable drainage systems (SUDS) and water features (e.g. Water Gardens) throughout the new masterplan.

The site would comprise ~~ten~~ [nine](#) parcels and blocks (A-H, ~~and J and K~~), as illustrated by Figure 6.2R. [Two options are now proposed for the mobility hub \(previously referred to as Block K\).](#)

Figure 6.3R shows the proposed predominant ground floor use parameter plan. The ground floor uses would comprise the following:

- A mix of residential and non-residential which would include residential, residential ancillary, servicing, parking, commercial uses and residential facilities; and
- Residential and residential ancillary which would be purely residential uses.

Figure 6.4R shows the proposed first floor use parameter plan. The first floor uses would comprise the following:

- A mix of residential and non-residential which would include residential, residential ancillary, servicing, parking, commercial uses and residential facilities; and
- Residential and residential ancillary which would be purely residential uses.

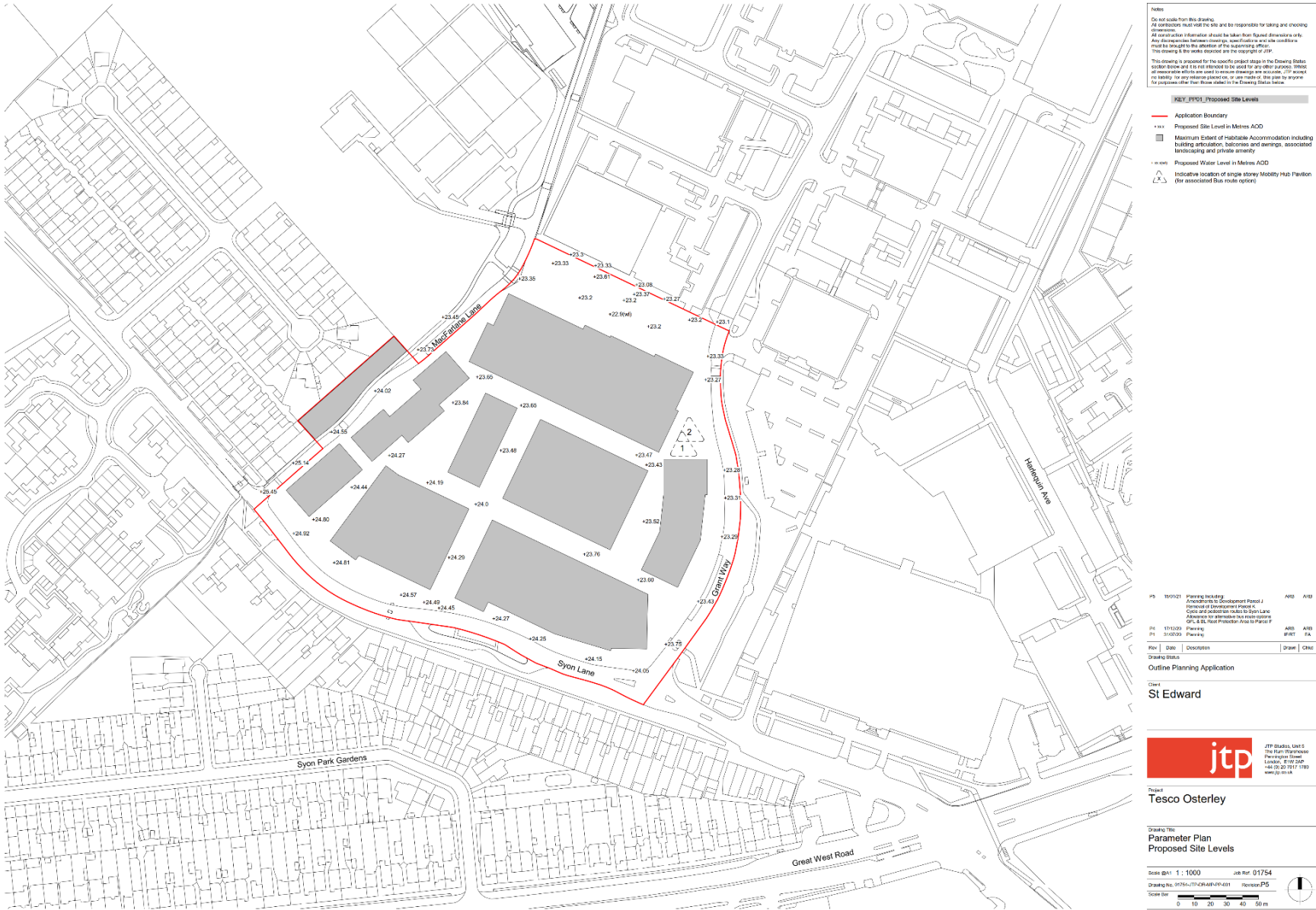


Figure 6.1R: Proposed Site Levels

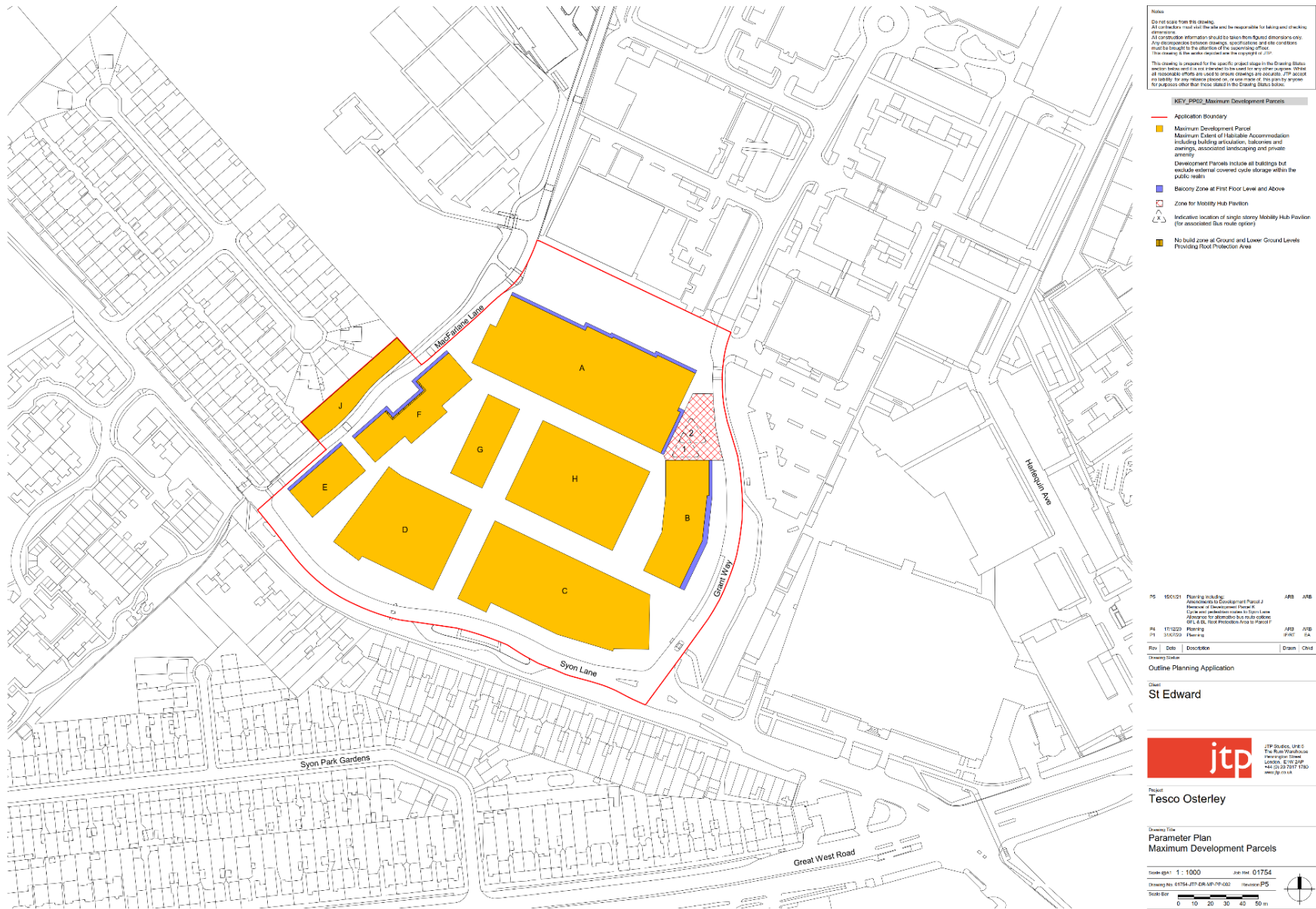


Figure 6.2R: Proposed Maximum Development Parcels

