

Homebase, Brentford

Environmental Statement Addendum

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TABLE OF CONTENTS

CHAPTERS

Chapter A Preamble

Chapter 9A Transport and Access

Chapter 14A Summary of Residual Effects

APPENDICES

Appendix 9.1A Transport Assessment

New Appendix 9.3 Driver and Bus Delay associated with Design Option 2

New Appendix 9.4 Driver and Bus Delay associated with Design Option 3

Townscape and Visual Effects Addendum

Built Heritage Assessment of Additional Views

ES Volume 3A Non-Technical Summary

(Note: Appendices are located at the end of the ES Addendum).

A. PREAMBLE

A.1 In September 2020, St Edward Homes Limited (the "Applicant"), submitted a detailed planning application for development on land located on Syon Lane in Brentford, Hounslow ('the Site'), for:

"Full planning application for the demolition of existing building and car park and erection of buildings to provide residential units, a replacement retail foodstore with additional commercial, business and service space, and a flexible community space, and ancillary plant, access, servicing and car parking, landscaping and associated works. (For information purposes, this comprises buildings up to 17 storeys providing 473 homes, 400 customer car parking spaces and 105 residential car parking spaces)."

A.2 The above proposals are referred to hereafter as 'the Development'.

A.3 The Development falls within Category 10(b) of Schedule 2 of the *Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)*¹ as an urban development project which includes more than 150 dwellings. An Environmental Statement (ES) was prepared to accompany the planning application.

A.4 Since the submission of the ES, a number of minor amendments have been made to the Development. Three additional viewpoints have also been undertaken to supplement the Townscape and Visual Impact Assessment (TVIA) and additional traffic modelling work has been undertaken as part of a revised Transport Assessment (TA) for the Development. This ES Addendum has been prepared to address each of these points, where required, and further discussion is provided below. Consultation responses to the ES have also been received and these are considered within the ES Addendum chapters, where relevant.

A.5 It should be noted that no changes have been made to the description of the Development. The changes to the key elements of the Development are the same as listed in Chapter 3 Site and Development Description of the September 2020 ES, with just one additional element which includes the recent incorporation of a 'site wide heat network based on high temperature air source heat pumps with PV panels on the appropriate available roof space'.

¹ The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (2017 SI No.571) (as amended in 2018 by SI No. 695 and in 2020 by SI No.505)

Changes to the Development and Environmental Statement

A.6 Since the submission of the detailed planning application and the accompanying ES, changes have been made to the Development as follows:

- Revision to the eastern façade of the Development (Building B2 and B3);
- Enhancement to the façade at the lower levels along Syon Gate Lane by increasing glazing and metal panelling;
- Minor amendment to the size of one residential unit (from 3B5P to 3B4P) in Building B2;
- Amendments to the refuse collection strategy and the bin store layout/configuration;
- Ensuring that a 3m wide shared pedestrian and cycle route is maintained along Syon Gate Way to comply with the aspirations of LBH in creating a new Clean Air Route;
- Increase in the amount of blue badge retail parking bays from 20 to 24 by reducing the number of parent and child spaces from 16-12, with the overall number of parking spaces remaining the same;
- Inclusion of 3.5m width pathway along A4 Great West Road north of Access Self Storage;
- Updated energy strategy, including the installation of a site wide heat network supplying heat from high temperature air source heat pumps, supported by backup gas boilers; and
- Reduction to the proposed drainage attenuation capacity.

Changes to prevailing baseline conditions and cumulative development

A.7 The ES was prepared in 2020. The assessment of effects considered a phased demolition and construction period. There have been no material changes to the baseline conditions since the submission of the ES in September 2020.

A.8 Schedule 4 of the EIA Regulations requires consideration of a proposed development cumulatively with other existing and/or approved development. Guidance on the consideration of cumulative effects in the EIA screening process is set out in the PPG, which echoes the requirements of the EIA Regulations:

"each application (or request for a screening opinion) should be considered on its own merits. There are occasions where other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development. The local planning

authorities should always have regard to the possible cumulative effects arising from any existing or approved development.”

A.9 Cumulative development was considered as part of the ES. The Applicant is not aware of any additional approved developments, within the defined cumulative scheme radius of 1km, that have been approved since the ES was submitted in September 2020, which could have the potential to result in likely significant effects on the environment in cumulation with the Development.

Structure of the ES Addendum

A.10 The structure of the ES Addendum and chapter authors is set out in Table A.1. The ES Addendum is designed to be read alongside the ES. Chapter numbers correspond to those used in the ES. Updated chapters from ES Volume 1, updated appendices from ES Volume 2 and an updated ES Volume 3, are all contained in the main volume of the ES Addendum.

A.11 Appendices which have been updated or replaced are included at the end of the ES Addendum. Further information is provided in the Table A.1.

Table A.1 ES Addendum Structure

ES Chapter	Author	ES Addendum Chapter
N/A	Barton Willmore LLP	Chapter A Preamble
Chapter 9 Transport and Access	RHDHV	Chapter 9A Transport and Access
Chapter 14 Summary of Residual Effects	Barton Willmore LLP	Chapter 14A Summary of Residual Effects
Volume 3A Non-Technical Summary	Barton Willmore LLP	Non-Technical Addendum Summary

Revised Transport Assessment

A.12 A revised TA has been prepared following consultation comments made by Transport for London (TfL) and LBH. The revised report includes:

- An updated description of the site layout to reflect changes to the proposed public realm, particularly with regard to Syon Gate Way;
- An updated commentary on Design Options and junction modelling for the Gillette Corner junction;
- Increase in the amount of blue badge retail parking bays from 20 to 24 by reducing the number of parent and child spaces from 16-12, with the overall number of parking spaces remaining the same;
- Updates to Active Travel Zone Assessments;

- The undertaking of a Healthy Streets Checklist for the applicant's preferred crossing design at Gillette Corner; and
- Details of a Station Capacity Assessment for Osterley Station.

A.13 Given the nature of the proposed amendments and requirement for additional traffic modelling, this would give rise to new and materially different residual environmental effects to those reported in the September 2020 ES and therefore an addendum Transport and Access chapter has been prepared.

ES Topic Chapters not updated as part of the ES Addendum

Population and Human Health

A.14 The proposed amendments will not affect the significance of the environmental effects arising from the scheme with respect to population and human health. It is noted that there is a very minor change to the residential mix (change of one unit from 3B5P to 3B4P in Building B2) however this would not have a bearing on the significance of effects included in the September 2020 ES.

Townscape and Visual Effects

A.15 Given the alterations to the façade of Buildings B2 and B3, the following verifiable views that formed part of the ES have also been updated to illustrate the proposed façade changes:

- View 2: Northumberland Avenue; and
- View 4: Great West Road Firestone Entrance.

A.16 Three additional representative views have also been tested, to address consultation comments from Historic England and the Kew Society. These include:

- View from Old Isleworth Gate (View 27);
- View from Thames Path (View 28); and
- View from Kew Gardens, Woodland Walk (View 29).

A.17 In order to supplement the TVIA, a TVIA Addendum has been prepared which considers the predicted effects of the revised eastern façade and an assessment of effects of the Development on the additional representative viewpoints.

- A.18 As set out in the TVIA Addendum, overall there are limited localised changes to the townscape and visual situation assessed and the amendments to the Development would not give rise to any new or materially different residual environmental effects to those reported in the September 2020 ES.

Built Heritage

- A.19 Given the three additional representative viewpoints which have been assessed and the update to Views 2 and 4 (refer to the TVIA Addendum), an additional Built Heritage assessment has also been prepared (refer to the Built Heritage Assessment of additional views) which assesses the likely significant effects of the Development on previously identified heritage assets included as part of the September 2020 ES. The additional Built Heritage assessment states that no new effects upon the significance of any previously identified heritage assets, and specifically the Royal Botanic Garden, Kew, have been identified from assessing the three additional viewpoints, over and above those effects included in the September 2020 ES. It remains the case that there is no harmful effect from the Development upon the significance of the Royal Botanic Gardens, Kew World Heritage Site and Grade 1 Listed Park and Garden.

Air Quality

- A.20 The proposed amendments include the installation of a site wide heat network supplying heat from high temperature air source heat pumps, supported by backup gas boilers. The air quality assessment carried out and reported in the September 2020 ES was based on the sole use of gas-boilers to provide onsite heating, and therefore it is expected that overall NO_x emissions would reduce with the updated energy strategy, compared to that assessed in the September 2020 ES. On that basis, the updated energy strategy will not lead to any change in the conclusions of the air quality chapter of the September 2020 ES, which would remain a worst-case assessment.
- A.21 The impact of the Development has been predicted at worst case existing and proposed future receptor locations, as agreed through the EIA Scoping process, using the dispersion model ADMS-Roads (v5). The assessment considered existing traffic flows on the road network as well as the predicted change in future traffic as a result of the Development. Vehicle emissions have been calculated based on vehicle flow, composition and speed data. Speeds on each road link have been supplied by the appointed transport consultant for each scenario, the average daily speeds supplied by the traffic consultant has been used on portions of road where free flowing traffic is expected, however this speed has been reduced close to junctions

or where queuing is expected. Worst case assumptions have been made with respect to the speed at these stretches of congestion, and the length of road that will experience congestion and queuing. In light of the additional traffic assessment work which has been undertaken, this will not have a significant impact on the expected speed, or the length of these portions of road, where a slower speed is already accounted for.

- A.22 Overall, the nature of the changes will not affect the significance of the environmental effects arising from the Development with respect to air quality. This is the result of there being no change to the building footprints and massing, building heights or development traffic numbers which would warrant any re-assessment.

Noise and Vibration

- A.23 The nature of the proposed amendments will not affect the significance of the environmental effects arising from the Development with respect to noise and vibration. This is the result of there being no change to the building footprints and massing as well as building heights. In addition, as there has been no change in the development traffic flow data which was assessed in the September 2020 ES which means there is no requirement for any re-assessment.

Daylight, Sunlight, Overshadowing and Solar Glare and Wind Microclimate

- A.24 As the minor amendments to the Development would not result in any change in massing, the conclusions of the assessment in relation to daylight, sunlight and overshadowing would still apply.

Methodology

- A.25 The ES has been updated, where necessary, to reflect the changes to the Development. Only chapters to which amendments have been made have been included in the ES Addendum.
- A.26 The following terminology is used throughout this addendum:
- The planning application submitted in September 2020 for which the original ES was prepared: the "Detailed Application";
 - The updated proposals: the "Development As Amended";
 - The ES submitted alongside the planning application in September 2020: the "September 2020 ES";
 - The site proposed to be developed: the "Site"; and

- This document, which updates the ES: the "ES Addendum".

A.27 Text added to chapters is indicated by track changes with **bold underlining**. Deleted text is identified by strikethrough text as follows: ~~deleted~~. Replacement Figures and Appendices are indicated by using the chapter number as a prefix followed by '**A**'.

Availability of the ES Addendum

A.28 Additional paper copies of the ES Addendum, including the NTS Addendum, can be purchased at a cost of £250. Copies of the ES Addendum can be obtained on memory stick for £25. All documents are available from:

Environmental Planning Team
Barton Willmore LLP
7 Soho Square
London, W1D 3QB

A.29 Email: IEPenquiries@bartonwillmore.co.uk

A.30 Hard copies of the ES Addendum will be issued to LBH and can be reviewed in person on request. Comments on the planning application can also be made via the Councils' websites or can be forwarded to the Planning Departments at the addresses below:

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

Tel: 020 8583 5555

Email: planning@hounslow.gov.uk