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London Borough of Hounslow
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PUBLIC

Dear Shane,

AMENDED PLANS AND DOCUMENTS AND ADDITIONAL INFORMATION RELATING TO PLANNING APPLICATION P/2020/3099 – HOMEBASE BRENTFORD

This letter accompanies amended plans and documents and additional information supplied relating to planning application P/2020/3099 at the Homebase Brentford site 'Syon Gardens'. This letter should be read as an addendum to our original Planning Statement (Ref – 62262067).

It should be noted that no changes have been made to the description of the proposed development. The changes to the key elements of the proposed development are the same as listed in 4.1.2 of the Planning Statement, 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 spaces'*.

This letter should be read alongside the following information submitted for re-consultation–

- Amended drawings –
 - Proposed lower ground 579-PTA-ZZ-B1-DR-A-1001 P32
 - Proposed ground floor 579-PTA-ZZ-00-DR-A-1001 P37
 - Proposed Level 4 Plan – Podium 579-PTA-ZZ-04-DR-A-1001 P31
 - South west Syon Lane 579-PTA-ZZ-ZZ-ELE-A-0001 P08
 - South east Syon Gate Way 579-PTA-ZZ-ZZ-ELE-A-0002 P09
 - North east elevation 579-PTA-ZZ-ZZ-ELE-A-0003 P09
 - South courtyard 579-PTA-ZZ-ZZ-ELE-A-0005 P08
 - Block D west courtyard 579-PTA-ZZ-ZZ-ELE-A-0010 P08
 - Block D east courtyard 579-PTA-ZZ-ZZ-ELE-A-0011 P07
 - Block C west courtyard 579-PTA-ZZ-ZZ-ELE-A-0012 P07
 - General Arrangement Plan Level 01 579-PTA-ZZ-01-DR-A-1001 P40
 - 1553-004X Combined All Levels Landscape Masterplan
 - 1553-013E Ground Floor Landscape Masterplan
 - 1553-021 Illustrative Play Provision

- 1553-022 Syon Lane Illustrative Improvements
 - Patel Taylor DAS Addendum
 - Amended RHDHV Transport Assessment
 - Amended RHDHV Car Park Management Plan
 - Amended RHDHV Construction and Logistics Plan
 - Amended RHDHV Delivery and Servicing Plan
 - Amended RHDV Travel Plan
 - Amended RHDHV Construction Environmental Management Plan
 - Amended Hodkinson Energy Statement
 - Amended Hodkinson Sustainability Statement
 - Environmental Statement Addendum (including letter of clarification, amended summary ES Chapter and ES Non-Technical Summary and amended Transport Chapter, and addendum to the townscape and heritage chapters).
 - AECOM FRA and Drainage Addendum (including Drainage Assessment Form)
 - AECOM Waste Strategy Addendum
 - KM Heritage Additional Views Assessment
 - ARC TVIA Addendum
 - DEFRA Metric BNG Calculations
 - Amended Heads of Terms
 - Amended CIL forms

It is set out below how the scheme has been amended or supplemented to provide additional information/assessment as requested by officers or other stakeholders during the course of the application.

Amendment 1 – Materials and detailing of eastern façade

Comments have been received from the GLA, LB Hounslow planning and design officers and third-party consultees with respect to the materials and detailing of the eastern facade. It was commented that they should be revisited in terms of tones and gridding and the design should establish a clear hierarchy that works horizontally rather than vertically. It was also noted that the lack of activation along the façade at the lower levels was an issue which should be addressed.

To respond to this, the material palette has been muted and instead of red brick on blocks B2 and B3 it now includes buff brick and vertical white brick banding to the corners of the two taller buildings. Whilst the mid-rise buildings have been made lighter in tone to improve the contrast between the B2 and B3 towers and they now include the cream brick used on Buildings D and E along with horizontal white brick banding.

Darker brown brickwork and panelling has been incorporated at the lower section of the facade and this has helped define the base of the building better and contributed towards adding visual interest to this part of the façade. Window alignments have been improved on the portion of elements between the buildings and glazing has been introduced wherever possible, primarily between blocks B1 and B2 to help activate the frontage and glazing has been increased to stair cores/means of escapes and a glazed residential amenity space at the bottom of B3 has been introduced. A canopy has also been introduced to the B2 residential entrance to make the entrance grander. It is considered the amendment to the façade is an improvement and has been discussed with Officers in detail and so should be supported.

This amendment is shown on plans; South west Syon Lane 579-PTA-ZZ-ZZ-ELE-A-0001 P08; South east Syon Gate Way 579-PTA-ZZ-ZZ-ELE-A-0002 P09; North east elevation 579-PTA-ZZ-ZZ-ELE-A-0003 P09; South courtyard 579-PTA-ZZ-ZZ-ELE-A-0005 P08; Block D west courtyard 579-PTA-ZZ-ZZ-ELE-A-0010 P08; Block D east courtyard 579-PTA-ZZ-ZZ-ELE-A-0011 P07; Block C west courtyard 579-PTA-ZZ-ZZ-ELE-A-0012 P07 and explained within the DAS Addendum note.

Amendment 2 – Refuse relocation

It was questioned by Transport and Design Officers as to whether the refuse collection location can be moved away from the entrances to the residential cores and can be located just outside the building.

Changes have been made to the location of the residential bin store and this will now be accessible directly from Syon Gate Way without the need to move bins to a presentation area for collection to allow for off street servicing. This will mean that there is no longer a need for bins to be towed up or down the site's basement ramp, and bins would not be moved to a presentation area directly outside the building on Syon Gate way for collection. It is considered this is an improvement both with respect to residential amenity and from a servicing and management perspective, as well as assisting with circulation along Syon Gate Way.

This change is reflected on plans; Proposed lower ground 579-PTA-ZZ-B1-DR-A-1001 P32 and Proposed ground floor 579-PTA-ZZ-00-DR-A-1001 P37.

An AECOM Waste Strategy Addendum has also been prepared which sets out how this change has affected the waste strategy.

Amendment 3 – Layout Change in Block B2

To respond to the request by the registered provider, one unit in Block B2 has been amended from a 3B5P dwelling to a M (4)3 3B4P dwelling.

This has been incorporated on plan Proposed Level 4 Plan – Podium 579-PTA-ZZ-04-DR-A-1001 P31.

Amendment 4 – Clean Air Route

Comments have been received from Design, Planning and Transport Officers with respect of the clean air route along Syon Gate Way and Syon Gate Lane. It was noted that it lacked appearance and function and raised that it was not an attractive enough alternative route. It was suggested that the ground floor space needed to be more inviting and active as it feels unsafe and in part is not wide enough. Re-design of the lower ground floor was recommended to achieve the minimum 3.0m width and so that pedestrian and cyclists can be safely segregated from vehicular traffic.

Inter-visibility between drivers exiting from the parking/servicing areas onto Syon Gate Way and users of the clean air route was also recommended to be worked on to account for its use by cyclists and pedestrians. Highways Officers commented that drivers will have no visibility of anyone using the shared-use footway/cycleway.

Further to the amendments to the design to activate the eastern elevation as set out above, a dedicated residential facility has been incorporated on the corner of Syon Gate Way where the road intersects with Syon Gate Lane (as shown on Proposed lower ground 579-PTA-ZZ-B1-DR-A-1001 P32). This is aimed at activating the corner through an inviting entrance and glazing. This room could be used as a cycle repair station, amazon lockers, community library or for any other need of the community and it is aimed at increasing footfall and encouraging use of the route.

The width of the clean air route has been increased to a minimum of 3m on Syon Gate Way to take into account the comments received regarding the width not being adequate. This has been achieved by refining the planting adjacent to the concierge and chamfering the building line. High quality paving will be installed on the segregated 3m minimum shared foot/ cycleway (Syon Gate Way) and a 4.6m min. wide pedestrian/

cycle route (Syon Gate Lane). Syon Gate Lane is waymarked with planted, feature gateway structures and will be well lit by overhead catenary lighting. Where space and function permit additional planting is included.

For both sides of the Tesco service yard access, chamfered corners will be provided as a means to create inter-visibility between pedestrians and vehicles accessing the site. Furthermore, kerbed upstands will be provided on both sides of the ramp to ensure that vehicles take an appropriate position on the ramp as they enter and exit. The access to the basement ramp has been amended. A pedestrian route would be provided on one side of the ramp and this would mean that a user of the clean air route could see down the ramp before crossing the vehicular path. On the northern side of the basement ramp, the building is angled so that an appropriate distance is afforded to allow a pedestrian to be made aware of the presence of a vehicle. Further, the entrance to the basement ramp will have a roller shutter preventing vehicles entering or exiting at speed.

An alternative bellmouth design at the junction of Syon Lane and Syon Gate Way has been incorporated that allows an articulated lorry to access Syon Gate Way whilst a vehicle simultaneously exits. This will prevent articulated lorries from obstructing the pedestrian crossing on Syon Lane.

The proposals represent a significant improvement over the existing situation and provide an alternative safe pedestrian/ cycle friendly route between Syon Lane and Station to destinations north of the Great West Road.

Drawings 1553-004X Combined All Levels Landscape Masterplan and 1553-013E Ground Floor Landscape Masterplan demonstrate the changes made to the Clean Air Route. It is important to note that these plans replace pages 36 and 37 in the submitted Landscape Strategy.

Amendment 5 – Retail Blue Badge Spaces

Amended level 1 layout plan (Ref - 579-PTA-ZZ-01-DR-A-1001 P40) has been submitted which amends the number of blue badge retail parking bays from 20 to 24 by reducing the number of parent child spaces from 16 to 12, however the overall number of parking spaces remains the same. This is to respond to comments received from Hounslow and TfL Officers. The level of blue badge spaces is now compliant with the Emerging London Plan Standards.

Amendment 6 – Transport Assessment

The amended Transport Assessment supersedes the originally submitted version. This presents updated peak hour traffic modelling based on discussions with TfL, including assessment of alternative scenarios for off-site highway improvements to the Great West Road junction

There are no changes to the total daily traffic flows as a result of the updated traffic modelling. As before, the cumulative effect of the Homebase Brentford and Tesco Osterley developments is to remove traffic from Syon Lane and nearby roads, with a net reduction in traffic on all 11-traffic links assessed. The reductions along Syon Lane to the north of the A4 would be particularly significant with c. 4,000 fewer daily vehicle movements.

Consideration has been given to options for improving pedestrian and cycling accessibility across the Great West Road junction. TfL has requested that the traffic modelling results are presented for four different options for new/improved pedestrian and cycling crossings around this junction in order to inform decision making on future improvements.

Across the course of a day, the cumulative effects of the developments are to reduce overall traffic on the local network. During peak hours, the assessment identifies a redistribution of traffic. The base option, with no additional crossings, demonstrates an improvement in the way the junction operates.

Design option 2 demonstrates that it is possible to improve north-south accessibility across the junction and to improve the way the junction operates, with journey time reductions in the weekday AM and PM peaks, and only a minor increase in the Saturday peak. The provision of an additional north-south crossing, as shown in design option 2, would more than mitigate the effects of the additional pedestrian/cyclist movements associated with the proposed developments. The main pedestrian movements associated with the developments are identified as being in a north-south direction, connecting new and existing residents on the north side of the Great West Road to Syon Lane station and the new Tesco store, and connecting residents on the south side of the Great West Road to the new spaces and facilities to be delivered on the Tesco Osterley site. There is also an option 2a which allows for the north-south crossing and retains the underpass.

Design options 3 and 4 investigate the feasibility of additional crossings to bring wider improvements to pedestrian and cyclist movements, including east-west movements along the Great West Corridor. Whilst these options would deliver greater improvements pedestrian and cyclist movements, the traffic flow through the junction would not operate as well as with design options 1 and 2, notably in the Saturday peak hour. It is concluded that design option 2 is the appropriate solution that is proportionate to the effects of the developments.

In recognition that TfL and LB Hounslow may in the future be keen on delivering wider improvements to pedestrian and cyclist movements, including east-west movements along the Great West Corridor, the Transport Assessment also contains plans identifying potential variations which are design options 5 and 6, with staggered crossings instead of straight crossings, that could be investigated in the future. This is reflected in the draft s106 heads of terms for Tesco Osterley with a proposed obligation relating to the investigation and assessment of staggered pedestrian crossing across the northern arm of the Great West Road junction at a future date.

Amendment 7 – Amended supporting transport reports including Car Park Management Plan, Delivery and Servicing Plan and Residential and Retail Travel Plans.

A number of comments were received from Hounslow Transport Officers regarding commitments made in the above documents. As a result, they have been amended and are resubmitted.

Amendment 8 – Environmental Statement and Heritage Statement

During the course of the application a number of comments were received from Historic England, the Kew Society, Royal Botanical Gardens Kew and the Gardens Trust suggesting additional viewpoints to incorporate in the townscape assessment. A TVIA addendum has been prepared which provides responses to these suggestions and explains the selection of additional viewpoints.

Three additional viewpoints from Kew have been selected and the addendum provides an assessment of the effect of the proposed development on these views (including the cumulative effect with the Tesco Osterley development).

Overall, the additional representative views support the findings of the September 2020 townscape chapter, which state that the development from the southeast would not be visible from the majority of the eastern route of the Thames Path including from outside Old Isleworth Gate and from the Thames Path opposite Syon House. However, a limited glimpsed view would be afforded through gaps in the intervening vegetation along the river. The effect of the completed development on both views is identified as being neutral in



nature. The third additional view is taken from the Woodland Walk within Kew. The townscape assessment identifies that the vegetation prevents a view of the development from the Woodland Walk area of the Royal Botanic Gardens.

KM Heritage have also prepared a Built Heritage Assessment of Additional Views and Heritage Statement on the heritage implications of the visibility of the proposed development from inside the Royal Botanical Gardens. The Built Heritage Assessment concludes that there is no new effect upon the significance of the Royal Botanic Garden from assessing the three additional viewpoints, over and above those effects already described in the Heritage Statement and Chapter 7 of the Environmental Statement. Therefore, it remains the case that there is no level of harmful effect from the proposed development upon the significance of the Royal Botanic Gardens, Kew.

The Transport Chapter has also been updated to assess the impact of bus delay and driver delay reflected by the updated peak hour traffic modelling. The Environment Statement Addendum confirms that there would be no change to the conclusions on noise and air quality as a result of the updated traffic modelling.

As a result, the Summary ES Chapter and ES Non-Technical Summary have been amended. Barton Willmore have prepared a letter of clarification to summarise the changes and how it affects the Environmental Statement.

Amendment 9 – Energy Strategy

Following feedback from Officers regarding the energy strategy that the development should seek to achieve an increase in onsite carbon reductions, St Edward has been working hard to improve the onsite carbon reductions and offering of onsite renewables.

The enclosed amended Energy and Sustainability Statement set out the updated approach, with a significant improvement in onsite reductions from 35% to 51% achieved with the potential for future improvement to 87% by 2030 with ongoing decarbonisation of the grid and SAP 10.1 being adopted. This is achieved with the incorporation of high temperature heat pumps and PV panels on the appropriate available roof space.

We consider this to be a significant improvement on the submitted Energy Strategy which previously proposed a policy compliant 36% on site carbon reductions.

As before, the remaining carbon emissions would be offset to ensure that the development is Net Zero Carbon. The revised energy strategy is fully compliant with Policy 5.2 of the adopted London Plan and Policy EQ1 of the Hounslow Local Plan and is a significant uplift on the policy requirement.

Amendment 10 – Drainage Strategy

Further to discussions and agreement with the Flood and Drainage Officer, the proposed attenuation tank volume, required to provide surface water attenuation and the management of flooding on-site has been reduced from 1,400 m³ to 1,080 m³. As requested by the Flood & Drainage officer, drainage model calculations have been undertaken to determine this volume and have been included in the updated Drainage Assessment Form (replacing the previous 'quick storage' estimate). In addition, the ground floor drainage layout has been updated to align.

A statement on the proposed inspection and maintenance of green and brown roofs has been added to Section 7 (Adoption & Maintenance) of the updated Drainage Assessment Form. A drawing of the exceedance flooding routes has been included within the updated Drainage Assessment Form.

The AECOM FRA and Drainage Addendum has been submitted which provides further information on the amendment to the drainage attenuation capacity and includes the updated Drainage Assessment Form. This approach has been agreed with your Flood and Drainage Officer on 7 December 2020.

Amendment 11 – Heads of Terms

Some changes have been made to the submitted CMS Heads of Terms in response to comments received from Officers including -

- Additional Pedestrian Crossing to require the assessment of a staggered pedestrian crossing across the southern arm of the Great West Road junction.
- Highways works to the Great West Road junction.
- Delivery of a scheme of public realm improvements between the site and Tesco Osterley site.
- 12+ Play Space Contribution based on the 243 sqm of shortfall on site.

Amendment 12 – CIL forms

It has come to our attention that the CIL forms did not include the correct existing floorspace and did not account for the under-croft car park area. The floor area has been amended and the correct CIL forms are attached to this submission.

Alongside the above amendments, we also submit additional information which has been requested by consultees during the course of the application:

Additional Information 1 - Play Space

The play strategy on site is incorporated in section 1.5 of the Landscape Strategy and this illustrates area measurements to demonstrate compliance with the GLA 'Shaping Neighbourhoods: Play and Informal Recreation' SPG (2012) and the required 0-5 and 5-11 play provision can be accommodated on site.

However, as discussed with Officers, the design does not envisage play starting and stopping at these virtual boundaries. The approach is to integrate the required play provision within the overall open space / amenity strategy, recognising that play can take place in a variety of settings and may or may not involve proprietary equipment. Integration of natural landscape elements, seating opportunities and play elements throughout the landscaped gardens will provide a flexible, playable landscape to meet the needs of different ages and can be shared by all generations throughout the day. We have explored opportunities to introduce natural elements and elements of risk and challenge within the play provision, which are appropriate to the needs of different age groups, while balancing safety and maintenance needs. Drawing 1553-021 Illustrative Play Provision provides further details on the play provision which can be accommodated on site. We are willing to agree to a condition to secure the amount and type of play provision on site.

Subject to agreement with the Local Authority it is recommended that additional 12+ plus provision can be catered for in Hawthorn Road Park (Also known as Hawthorn Hatch) which is located south east of the site and is easily and safely accessible from the development by foot.

St Edward is willing to provide an appropriate s106 contribution to enhance the routes to Hawthorn Road Park or alternatively the play facilities themselves. It currently only has doorstep playable space for ages 0-5, but St Edward are willing to enhance this and contribute 474 sqm of 12+ play provision to make up for the shortfall on site. This obligation has been added to the Heads of Terms.

Additional Information 2 – Improve links to Tesco site

It was commented by Officers that the submitted planning documents highlight the route in between Homebase and Tesco being improved for pedestrians and cyclists. The final designs would be dependent on the agreed junction improvements, but further illustrative detail and commitment to funding such improvements is requested.

The preferred design option 2 as set out in the Amended Transport Assessment includes for a north-south crossing across the northern arm of the Great West Road junction. The main pedestrian movements associated with the developments are identified as being in a north-south direction, connecting new and existing residents on the north side of the Great West Road to Syon Lane station and the new Tesco store,



and connecting residents on the south side of the Great West Road to the new spaces and facilities to be delivered on the Tesco Osterley site.

There is also an option 2a which allows for the north-south crossing and retains the underpass. Murdoch Wickham have provided an indicative plan MW_20201216: dwgs 1553-022 'Syon Lane Illustrative Improvements' that shows potential enhancements to the underpass with precedent images of what could be achieved in the public realm between the Homebase and Tesco sites.

A new head of term has been added for an Additional Pedestrian Crossing to require the assessment of a staggered pedestrian crossing across the northern arm of the Great West Road junction, as well as a head of term for the delivery of a scheme of public realm improvements between the site and the Tesco Osterley site.

Additional Information 3 – UGF and BNG calculations

The LB Hounslow Environmental Strategy Officer has requested additional information with regards UGF and BNG calculations.

For clarification, the UGF calculation is included in the submitted Landscape Strategy at page 31. The Defra Metric has been completed for the BNG and this is included with this submission.

There will be significant urban greening and biodiversity net gain through the incorporation of podium and public realm planting and incorporation of green and brown roofs in comparison to the existing current situation.

We trust that the above and attached addresses the queries and requests raised and the information is re-consulted on in a timely manner.

Should you have any queries, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink that reads "Grace Mollart". The signature is written in a cursive, flowing style.

Grace Mollart
Associate