

NOTICE OF SCOPING OPINION

DETERMINATION BY THE LOCAL PLANNING AUTHORITY OF SCOPING OPINION AS TO THE INFORMATION TO BE PROVIDED IN THE ENVIRONMENTAL STATEMENT UNDER REGULATION 10 OF THE TOWN AND COUNTRY PLANNING (ENVIRONMENT IMPACT ASSESSEMENT REGULATIONS) 1999

Applicant: RPS Planning And Development Ltd Cottons Lane London SE1 2QG

Agent: Mr David Thomson RPS Planning And Development Ltd Cottons Centre London SE1 2QG

Description and location of proposed development:

Proposal: - Scoping Report pursuant to Regulation 10 of the Town & Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 for Environmental Impact Assessment in respect of: 'Demolition of existing buildings and comprehensive redevelopment of the site to provide sustainable mixed use development, comprising residential use (between 3,400-3,750 residential units), retail use (A1-A5 uses), hotel and banqueting suite, commercial and community facilities (including school and health centre), energy centre (CHP plant), open space, car parking provision, new roads and new pedestrian access, landscaping and public realm/environmental improvements (outline application)'. (Also four supporting detailed applications for new roads and pedestrian access).

Site:- SOUTHALL GAS WORKS SITE THE STRAIGHT SOUTHALL UB1 1QX

Application No:- P/2007/5330-ST

In accordance with the provisions of the Town and Country Planning (Environmental Impact Assessment) Regulations 1999, the Council of the London Borough of Ealing has considered your request for a 'Scoping Opinion' and hereby determines that the Environmental Impact Assessment Statement should include the information given in the submitted statement together with additional information specified in the attached schedule.

Kevin Harris

Signature:.....

Kevin Harris
Head of Planning
(the Proper Officer)

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Planning Services
Perceval House

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Telephone: 020-8825 6600, Fax: 020-8825 6610

Serial No: P/2007/5330
Dated: 10/03/2008

Scope



SOUTHALL GAS WORKS SITE, THE STRAIGHT, SOUTHALL

SCHEDULE OF ADDITIONAL INFORMATION REQUIRED IN ENVIRONMENTAL ASSESSMENT

Environment Agency

Overall the EA is happy with the scope of the report. However, the EA has identified that the report has not adequately addressed flood risk. Therefore the following comments are made:

Flood Risk

The EIS scoping report has not adequately addressed flood risk for the development.

A Flood Risk Assessment is required as part of the site is affected by Flood Zone 3 and 2, and as the site is over 1ha, a Surface Water Flood Risk Assessment will also need to be submitted with the application.

Whilst the EIA mentions water quality aspects, it does not focus on flood risk reduction to and as a result of the development. The application must comply with the requirements set out in Planning Policy Statement 25: Development and Flood Risk.

For the Surface Water Strategy to be acceptable to the EA the drainage system shall be designed as follows:

- Surface water discharge from the site shall be restricted as far as possible to the greenfield rate (typically 2-8 l/s/ha).
- On site attenuation for the 1 in 100 year critical storm, including climate change as defined in PPS25 shall be provided.
- Sustainable Drainage Systems (SUDS) shall be employed.

The site is also in close proximity to the Yeading Brook. As part of the site development, an 8m undeveloped buffer zone, free of any buildings and hard-standing, should be left from the top of bank of the river. The EA would request a 5m buffer zone should be left from the bank of any ordinary watercourse.

Under the terms of the Water Resources Act (1991) and Thames Region Land Drainage Byelaws (1981), the prior written consent of the Environment Agency is required for any works in, over, under or within 8m of the Yeading Brook main river.

Demolition and Construction

It is important that the process of demolition and construction is also considered regarding fuel storage for machinery etc for such a large development. Guidance can be

found on the Environment Agency Pollution Prevention Guides (PPGs) at www.environment-agency.gov.uk/ppg. There is a specific guide for construction and demolition sites (PPG6).

Ground Contamination & Construction Waste

The EA agrees with the scoping sections on Ground Contamination & Construction Waste and The Water Environment.

The type and nature of contamination on [and/or surrounding] this site is such that it will require extensive remediation [and/or monitoring]. The EA advises early engagement between the developer, Local Authority and ourselves to discuss the opportunities available through the planning obligation (Section 106) route to ensure that this site will be appropriately remediated [and/or monitored] in order to protect controlled waters.

The EA recommends that developers should:

1. Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.
2. Refer to the Environment Agency Guidance on Requirements for Land Contamination Reports for the type of information required in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, e.g. human health.
3. Refer to our website at www.environment-agency.gov.uk for more information.

Seeking Enhancements

A development of this scale presents opportunities for environmental enhancements. The EA are happy to provide guidance as the design develops and review plans before they are submitted into the Local Planning Authorities. Please also review a copy of the EA Developers Pack via the following link:
www.environment-agency.gov.uk/developers.

British Waterways

British Waterways is a public body set up to maintain and develop the network of canals and other inland waterways in a sustainable manner so that they fulfil their full economic, social and environmental potential. In addition to statutory navigation and safety functions, British Waterways has to:

- Conserve our waterway heritage and environment
- Promote and enable rural and urban regeneration
- Maintain and enhance leisure, recreation, tourism and education opportunities for the general public and
- Facilitate waterway transport

After due consideration of the scoping report, British Waterways has the following comments to make:

Para 5.25 – The Transport Assessment in the ES should include an assessment of the feasibility of servicing the site with waterborne freight during the site clearance and construction phase, and during occupation.

Para 5.37 – The Grand Union Canal including the towpath and the residential moorings at Bull's Bridge should be included as potentially sensitive receptors to noise and vibration.

Para 5.70 – the existing weir structure, the old docks and the outfalls which stick out into the canal water and have come detached should be considered in the Water Environment Impact Assessment.

Ecology and Nature Conservation p.35 - It should be noted that British Waterways is the relevant canalside statutory consultee for ecology and nature conservation.

Archaeology p.37 – The heritage value of the old canal docks should be considered in this section.

Operational Waste p.42 – The feasibility of using the canal to transport waste/recyclables from the site should be considered here. The West London Tram report may be of assistance with this regard.

Natural England

After careful consideration of the information provided, Natural England considers that this Scoping Report covers the areas that Natural England would wish to see considered. Natural England is pleased to see the inclusion/consideration of Minet Country Park and the Paddington Branch of the Grand Union Canal, in respect of "sensitive receptor" sites which it welcomes and would wish to encourage.

The undertaking of Phase 1 Habitat Surveys as well as Protected Species Surveys is also welcomed and to be encouraged, as the site offers potential habitat and foraging opportunities for a variety of protected species including bats, and you are referred to the information on Greenspace Information for Greater London (GIGL) below.

Paragraph 5.79 refers to Maintenance procedures, Management and Monitoring of the ecology and nature aspects of the site and this is to be commended and encouraged also.

Section 40 of the Natural Environment and Rural Communities Act 2006, imposes an important new duty on all public authorities to have regard to biodiversity.

Natural England recommends that advice is sought from other sources, where not already undertaken, including the Greater London Assembly Biodiversity Unit, the Council's own in-house Ecologist, or the local group of the London Wildlife Trust or similar nature Conservation Group.

It is also recommended that the Council should give consideration to entering into an agreement with Greenspace Information for Greater London (GIGL) for the provision of

biodiversity data including details of statutory and non-statutory sites, distribution of protected species and location of habitats and species of nature conservation value. GIGL has a sizeable and rapidly expanding database of biodiversity and other green-space data, and enclosed is a copy of their newsletter. GIGL can be contacted at:

GIGL@wildlondon.org.uk

You should also be aware that, in addition to PPS 9: Biodiversity and Geological Conservation, there are a number of resources available to assist the Council and developers when considering the nature conservation implications of development proposals in Greater London. These include the following:

Design for Biodiversity

http://www.london.gov.uk/mayor/strategies/biodiversity/docs/design_for_biodiversity.pdf

Protected Species Guidance Notes – prepared by the Natural London office and available via the London Biodiversity Partnership web site at the following address: www.lbp.org.uk/07library.htm#to_advicenotes or by contacting the following address: London@naturalengland.org.uk

Sport England

Sport England's comments on the Scoping Report are limited to consideration of the impact of increased households on demand for sport and recreation facilities.

PPG17 (Planning for Open Space, Sport and Recreation) states in para. 33 that planning obligations should be used as a means to remedy local deficiencies in the quantity or quality of open space, sports and recreation provision.

To assist in assessing the increased demand for sports facilities, Sport England has developed its Sports Facilities Calculator. This uses data on facility participation and applies these to the population profile of each local authority area, using Census data. It produces an estimate of demand for each of three key sports facilities expressed in facility units. These facilities are swimming pools, sports halls and indoor bowling centres. It uses building cost information for average facilities endorsed by Sport England. This excludes site abnormal costs, VAT and land costs. The costs are updated automatically using the latest RICS Building Cost Data. The calculator also uses the national average usage rates for pools, sports halls and indoor bowls derived from user surveys. So it can calculate the additional demand for these facilities that a given population increase generates assuming the population profile remains the same. (A different population profile can also be applied.) The calculator can also factor in changes in participation rates for each of the facilities. To ensure that current data is used, the calculator has a limited life of 30 days after downloading before another updated version must be downloaded.

The Sports Facilities Calculator can be downloaded from our website at: www.sportengland.org/calculator

Taking the figures provided in the Scoping Report, for 3,400 to 3,750 residential units - this would provide an increased population of 8,160 - 9,000 (assuming average occupancy rate of 2.4 persons/unit).

Putting these figures into the Sports Facilities Calculator produces the following results:

(1) Population increase: 8160

Assumed 0% increase in participation

Facility Provision Demanded: Pools = 0.42 Sports Halls = 0.63 Indoor bowling centres = 0.39

Costs of provision	£991,101	£1,912,104	£112,020
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Total = £3,015,225

(2) Population increase: 9000

Assumed 10% increase in participation

Costs of provision	£1,202,439	£2,319,832	£135,906
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Total = £4,860,616

Sport England therefore considers it appropriate for substantial S106 contributions to be negotiated to fund the provision of additional or improved sports facilities to reflect the increased demand generated by the residential development proposals.

This is relevant to para 4.3 of the Scoping Report "Specification of additional mitigation measures to be implemented through planning conditions, S106 obligations and other control mechanisms". Also to para 5.6 "the demand generated by new households on social and community facilities and open space, and the provision of new facilities within the scheme". Also to the approach to assessment para 5.10 "Changes to local services demand created by increased population".

In summary, therefore, Sport England would expect to see appropriate contributions towards meeting the increased demand for sport and active recreation facilities generated by the increased population through this development.

Network Rail

Network Rail does not normally comment on Screening and Scoping Reports, preferring to wait until the planning application is submitted before commenting.

However, the Scoping Report has been examined and it is considered by Network Rail that there should be no prospect of any discharge of smoke, fumes or dust that might drift across the railway causing problems with visibility for train drivers, and the consequent safety implications that might arise. Similarly there should be no possibility of the discharge of any substance that might migrate across the railway boundary and cause problems.

Additional or increased flows of surface water should not be discharged onto Network Rail land or into Network Rail's culvert or drains. There should be no risk of pollution to the drainage in the area used by Network Rail.

The following comments should also be considered for any application adjacent to the railway and associated infrastructure:

Fencing

This development will create a trespass and vandalism risk on to the railway. In the interests of promoting public safety, it is recommended that a 1.8 metre high trespass resistant fence be erected parallel to but separate from the railway fence.

Drainage

Additional or increased flows of surface water should not be discharged onto Network Rail land or into Network Rail's culvert or drains. In the interest of the long-term stability of the railway, it is recommended that soakaways should not be constructed within 10 metres of Network Rail's boundary.

Safety

No work should be carried out on the development site that may endanger the safe operation of the railway or the stability of Network Rail's structures and adjoining land. In particular, the demolition of buildings or other structures must be carried out in accordance with an agreed method statement. Care must be taken to ensure that no debris or other materials can fall onto Network Rail land. In view of the close proximity of these proposed works to the railway boundary, the developer should contact Keith Buckland at Network Rail on opewestern@networkrail.co.uk before works begin.

Ground Levels

The developer should be aware that Network Rail needs to be consulted on any alterations to ground levels. No excavations should be carried out near railway embankments, retaining walls or bridges.

Site Layout

It is recommended that all buildings be situated at least 2 metres from the boundary fence, to allow construction and any future maintenance work to be carried out without involving entry onto Network Rail's infrastructure. Where trees exist on Network Rail land the design of foundations close to the boundary must take into account the effects of root penetration in accordance with the Building Research

Establishment's guidelines.

Environmental Issues

The design and siting of buildings should take into account the possible effects of noise and vibration and the generation of airborne dust resulting from the operation of the railway.

Landcaping

In the interests of safety, all new trees to be planted near Network Rail's land should be located at a distance of not less than their mature height from the boundary fence. Details of planting schemes should be submitted to this office for prior approval.

Plant, Scaffolding and Cranes

Any scaffold which is to be constructed adjacent to the railway must be erected in such a manner that at no time will any poles or cranes over-sail or fall onto the railway. All plant and scaffolding must be positioned, that in the event of failure, it will not fall on to Network Rail land.

Crossrail

CLRL have a single observation in relation to the application for a Scoping Opinion. In discussions with the design team representing National Grid Property Holdings Ltd and Castlemore Ltd, agreement was reached to alter the original road layout at the interface with South Road to avoid an underpass under Station Road and interference with the proposed Crossrail station buildings. The road layout was relocated in its entirety to the east of South Road and CLRL would wish this to remain as the solution for road access at the east end of the development site. Otherwise CLRL have no further comment.

British Airports Authority

BAA, for Heathrow Airport Limited, comments as follows:

The site lies 5 Km North East of the Aerodrome Reference Point for Heathrow Airport.

Height

The site lies beneath two of the Obstacle Limitation Surfaces for the airport, which are the Inner Horizontal Surface (IHS) (a flat surface at 67.87m Above Ordnance Datum [AOD]) and the Conical Surface (an inclined surface which rises at a rate of 1:20 from the edge of the Inner horizontal Surface). An enclosed diagram shows the outline of the site with the contours of the Conical Surface rising from 67.87m AOD to 102m AOD.

These two surfaces give the height limit to which we would restrict development regardless of the current infringement of the OHS by the existing Gas Holder.

Landscaping

Landscaping in this area may have the potential to attract birds to the site. General advice can be found in Advice Note 3 Potential Bird Hazards from Amenity Landscaping and Building Design (available at www.caa.co.uk/srg/aerodrome).

Specific advice can be given on production of the landscaping plans which should include plant numbers and species, and for trees, the planting centres proposed. However, Oak and Scots Pine should be avoided in the planting palette as they have the potential to create a dense canopy suitable for roosting for flocking species such as starling, pigeon, corvid, and winter thrushes. The Oak also provides a food source for pigeon species. Other tree species should be planted at 4m centres or greater to avoid the creation of a dense canopy.

Berry-bearing plant species, including trees, should be reduced to 5% of the total planting palette and dispersed throughout the site to avoid the creation of a dense food source for flocking bird species.

Open Water features, including SUDS should be avoided unless the design can make the feature unattractive to hazardous species including gulls, and waterfowl.

Flat/shallow pitched/green roofs all have the ability to attract roof nesting gull species and a management plan will be required to monitor the roof spaces for gull activity. As a general rule roofs with a pitch of 15 degrees or more are usually unattractive for nesting, unless covered in a plant species that allows nests to be anchored to the roof. Fully pitched roof will not require management plans.

Construction Issues

Cranes will inevitably be used for the construction of this site and a crane permit will be required from the Operations Department at the airport. Early application is advised.

Sustainable Energy

Although not proposed in the EIA, wind turbines are becoming increasingly popular for Sustainable Energy uses. Wind turbines in this location would have the ability to adversely affect the radars used by the airport. If submitted for planning approval, Wind Turbines would be likely to attract an objection.

Please be advised that the advice given is informal and without prejudice to the consideration of any planning application which may be referred to us pursuant to Planning Circular 01/2003 in consultation under the safeguarding procedure. It cannot be assumed that any response to consultation under Planning Circular 01/2003 will necessarily coincide with the informal advice now given. We will not have any liability to you or third parties who may follow this advice.

It should also be made clear that provision of this advice does not constitute support for the development nor an opinion that the development is acceptable under local planning policy

If BAA can be of any help to the developer prior to planning submission, the contact is Mrs. Lesley Duggan on telephone number 01293 503879.

National Air Traffic Service

The NATS has no comments on the Scoping Report, but wishes to reserve the right to comment at the planning application stage where there may be issues involving the safeguarding of NERL Technical sites under the Town and Country Planning Act.

Additionally, there may be construction issues that will need to be addressed, such as crane heights.

London Borough of Hillingdon

General Comments

This Scoping Report would appear to address all the concerns raised in the earlier Scoping Opinion issued by Hillingdon Council in 2004. However there are still issues, which should be addressed.

Of key importance to the London Borough of Hillingdon is the transport, air quality, environmental and socio – economic implications on the Borough. The Environmental Statement should enable officers to assess fully the implications on:

- open space in Hillingdon (both increased demand and usage of open space with respect to Section 106 contributions and
- implications from the development itself on the Green Belt and designated Sites for Nature Conservation)
- education, in particular senior schools (also S106 contributions)
- addition the implications for highway and pedestrian links.

Specific Comments on the Scoping Report:

(1) Socio-economic and population:

Para 5.10 - This concentrates on positive effects, but negative effects also need to be considered. For example, will the new retail uses undermine the viability and future growth of Hayes Town Centre and the secondary centre on the Uxbridge Road in Hillingdon?

A robust assessment is required regarding the level of demand for existing and new health, education and community facilities, and how this will be addressed.

Regarding open space, impacts on adjacent LB Hillingdon land need to be considered. In particular, will the on-site provision of open space be sufficient to ensure that the resultant impact on Hillingdon is not a reduced level of provision for Hillingdon residents.

(2) Air quality:

No reference is made to LB Hillingdon's AQMA or AQMP, which needs to be taken into account, particularly as access routes will be located within LB Hillingdon and therefore considerable vehicle movements associated with the development will occur within the borough, having consequent effects on air quality.

Para 5.42 - It should be noted that if an energy generating means such as CHP is to be utilised, air quality effects from this should be included within an air quality assessment.

(3) Townscape and visual:

Para 5.52 - No mention is made of the site being adjacent to Minet Country Park and a Site of Importance for Nature Conservation in LB Hillingdon.

Para 5.59 - Effects on the adjacent Green Belt land and Site of Importance for Nature Conservation in LB Hillingdon need to be addressed.

(4) Solar shading:

Para 5.93 - Solar shading effects need to be considered additionally on residential amenity space, not just buildings and public realm.

Summary

In general, LB Hillingdon considers the content of the Scoping Report to be a useful baseline but it does need to include points 1 – 4 above. The forthcoming Environmental Statement will be expected to include consideration of these issues and means of mitigation (if appropriate) or avoidance.

On the basis that the above points are included in the Environmental Statement, then the Scoping Report is approved.

London Borough of Hounslow

Acknowledgement only – no comments offered.

Ealing Primary Care Trust

Ealing PCT comments as follows:

With regard to health services there would need to be new facilities to care for the new population generated by the development in that there is no capacity within existing provision to absorb this.

It is recognized that health benefits that would flow from significant regeneration of the Southall area. However, the achievement of such benefits would only be possible if the developer addresses public health and environmental issues arising from the proposed development, and in particular provide sufficient space to develop health care premises fit for delivering modern primary care for the next twenty or more years.

Our recommendations concern health services and health impact assessment, as follows:

HEALTH SERVICES

- A modern primary care facility on an appropriate scale to be included in the redevelopment to deliver a full range of provision.
- The need for a health centre north of the railway has been established by the master planning exercise, independently of Gas Works site development. Depending on timescales and location on the Gas Works site the new health centre could be purely for the new population; this would be a subject for the Section 106 agreement.
- The exact size and range of facilities in the new health centre would be influenced by other strategies, eg. Healthcare for London. It may be appropriate to operate as a polyclinic or large group practice for Southall, depending upon transport links, timescales for the development and other factors. Up to 5000 sq. metres may be needed.
- The new health centre should be resourced and operational at a pace commensurate with the arrival of relevant residents, with the developer ensuring a temporary GP facility is in place for an initial period of occupation.
- The PCT, in partnership with the Local Planning Authority would need to run the HUDU model to assess the impact on health service provision for the new population. To do this, more specific details would be needed on the occupancy of the residential units, eg. number of beds and the percentage affordable, etc.

HEALTH IMPACT ASSESSMENT

- A full Health Impact Assessment (HIA) should be commissioned to identify the potential and negative health impacts of the development on those living in both existing and new housing, and the means to address them, in both the short and longer terms.
- The HIA should consider short and long term effects on health status and on the need for primary and secondary health services. Considerations would range from (for example) increased need for child health services arising from an increased population, to potential exacerbation of chronic obstructive pulmonary diseases arising from temporary decreases in air quality (if identified) and positive and negative effects on mental well-being of changes in the environment.
- The HIA should involve local communities and take into account their views, following best practice on community engagement.
- Recommendations from the HIA should be incorporated in the final plans for the site.

LB Ealing Education Services Department

The Scoping Report has been examined and it is considered that the contents are satisfactory and there is nothing that needs to be added with regard to provision for Education.

The most relevant passage regarding Education is para 5.5 in the introduction to the Socio-Economics and Population Section. This states that the assessment will adopt the main elements of the methodology agreed with the London Boroughs of Ealing, Hillingdon and Hounslow in 2004, updated where necessary to reflect changed conditions.

The Education Department is content that the wording used in the Scoping Report allows flexibility around the formula used to calculate the child yield from the Gas Works redevelopment. LB Hillingdon and LB Ealing devised a joint model to use for the Gas Works redevelopment in 2004. Hillingdon is currently carrying out consultation on adopting a new child yield model based on the 2001 Census, and Ealing is informally moving towards using the basis of the LB Wandsworth.

It has been agreed with LB Hillingdon that, when data on the potential mix/split of housing units becomes available, the joint Hillingdon/Ealing model will be reviewed alongside Hillingdon's work on the 2001 Census and also the LB Wandsworth model. It is not anticipated that there would be a large variation between them.

LB Ealing Environmental Health Division

The Council's Environmental Health officers comment as follows:

- (1) Para 5.33 – The Noise and Vibration assessment needs to address Supplementary Planning Guidance SPG 10 'Noise and Vibration' with regard to the 2016 noise contours for Heathrow Airport – worst mode one day and potential changes (eg. third runway).
- (2) Para 5.34 – The construction phase also needs to assess dust nuisance impact using BRE and other guidance (eg. background dust burden surveys before works for comparison, and also dust control monitoring). See additional advice below on noise and pollution control.
- (3) The Scoping Report is considered to satisfactorily outline a suitable methodology for initially assessing the ground conditions and water environment at the Gas Works site, leading on to eventual remediation, and also considering residual impacts and mitigation measures.
- (4) The contents of the Air Quality section of the report are considered to be satisfactory.

Noise and pollution control guidance

The Building Research Establishment has published 5 pollution control guides on the control of particles, vapour and noise from construction sites. These advise on pre-project planning, site preparation, haulage, storage of materials and site operations.

The sections are as follows:

Part 1: pre-project planning and effective management. ISBN1 86081 6541

Part 2: site preparation, demolition, earthworks and landscaping. ISBN 1 86081 655X

Part 3: haulage routes, vehicles and plant. ISBN 1 86081 6568

Part 4: materials handling, storage, stockpiles, spillage and disposal. ISBN 1 86081 6576

Part 5: fabrication processes and internal and external finishes ISBN 1 86081 6584

The guidance is available from the BRE bookshop on 0207 505 6622 email: enquiries@bre.co.uk . The BRE website is www.bre.co.uk.

Detailed guidance is also available in BS 5228: Noise control on construction and open sites, Parts 1 – 4 on the prediction of noise and vibration which will be received at sensitive premises, selection of plant to meet “best practicable means”, methods of reducing noise etc. Copies available from Her Majesty's Stationary Office.

The advice given is regarded to be best practice and the Council expects developers and contractors to comply with it.

LB Ealing Transport Services Division

Concerns are raised by the Council's transport planners with regard to the following:

Para 5.16: There is no mention of a link road from Springfield Road. Such a link would improve the permeability of the site, and could be used primarily as a public transport route and by pedestrians and cyclists, discouraging through traffic. The number of accesses to the redevelopment site area can only be determined through an agreed Transport Assessment submitted with the planning application – this is still under discussion. The width of the main road accesses can only be determined through the Transport Assessment and through consideration of the traffic to be generated by the development. Upon completion of an agreed redevelopment scheme, the Highway Authority will require the closure of the Brent Road underpass beneath the railway to all vehicular traffic.

Para 5.18: The ‘off site’ highway proposals cannot be determined at this stage.

Para 5.21: There is disagreement with the statement in para. 5.21 regarding proposals for significant alterations to the local highway network. It has already been agreed with the developer's transport consultants to use 0.8 vehicular growth during peak hours.

Para 5.25: ‘Peak periods’ should include weekend periods.

Para 5.28 The usage of the LINSIG programme should be added here for the checking of isolated junctions.

LB Ealing Parks/Countryside Division

The Council's Parks and Countryside Service comments that the provision of a buffer zone would be expected alongside the Canal which is a Site of Importance for Nature Conservation.

LB Ealing Conservation and Urban Design Team

The Conservation and Urban Design Team comments that the information detailed in the Scoping Report is satisfactory with regard to the proposed Design and Access Statement, the Parameter Plans and the Townscape and Visual Assessment.

The level of detail, clarity and quality of information presented will clearly be crucial to enable proper understanding of the proposals and the ability to comment on the scheme from an urban design perspective.