

By email: [REDACTED]

25 June 2026

[REDACTED]

## **Town and Country Planning (Environmental Impact Assessment) Regulations 2017 Scoping Opinion**

Proposed Development: *Demolition of existing structures and associated infrastructure and the construction of a residential-led, mixed-use development.*

Location: *Sainsbury's Car Park and Petrol Filling Station ('The Tileworks, Alperton')*

Further to your email dated 14<sup>th</sup> May 2026 together with the document "Alperton EIA Scoping Opinion Request Report Prepared for Barratt Homes May 2026" (The "Scoping Report"), the Council has determined that the development proposed is EIA development, falling within Schedule 2, 10(b) (Infrastructure Projects – Urban Development Projects of the Environmental Impact Regulations 2017 ("The Regulations").

In accordance with Regulation 15 of The Regulations the Council has consulted the following consultation bodies;

- Environment Agency
- Historic England
- Greater London Archaeological Advisory Service
- Natural England
- Network Rail
- Transport For London
- Thames Water
- Canal and River Trust.

The responses received have been taken into account in forming this Scoping Opinion. Copies of the responses are attached to this Scoping Opinion; where relevant, the key issues raised are reflected in the Council's conclusions on the scope of the Environmental Statement.

Having regard to responses from consultation bodies the Council considers that the submitted Scoping Report correctly and sufficiently identifies matters to be "scoped in" to the Environmental Statement for the development proposed. These matters being:

- Climate Change and Greenhouse Gases
- Daylight, sunlight, Overshadowing, Solar Glare and Light Pollution;
- Noise and Vibration;
- Socio-Economics

- Wind microclimate / Engineering;
- Townscape and Visual;
- Ground Conditions and Contamination;
- Air Quality;
- Ecology and Vibration;
- Traffic and Transport;

The Council also agrees that the following matters may be “scoped out” of the Environmental Statement

- Air quality
- Archaeology
- Heritage and Visual Impact Assessment
- Ecology and Biodiversity
- Ground conditions
- Human Health
- Project Vulnerability
- Traffic and Transport
- Waste and Minerals
- Water Resources, Drainage and Flood Risk

The Council is minded of comments received from Natural England and Thames Water, who raise the possibility of the need for a number of the “scoped out” matters identified above, to be included in an Environmental Statement. However, the Council is satisfied, based on the information in the Scoping Report, that all matters scoped out can be sufficiently assessed in the context of planning policy and practice guidance through the planning application process, outside of the Environmental Impact Assessment.

Notwithstanding the scoping matters, the applicant is advised to have regard to comments received from consultation bodies in relation to any forthcoming planning application. The Environmental Statement should be as set out in the Scoping Report and in accordance advice given in the consultation responses attached.

Yours sincerely,



Paul Lewin  
Spatial and Transportation Planning Manager  
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#### Attachments

- Letter Canal and River Trust (22 June 2026)
- Email and HNL National Preliminary Opinion Environment Agency (9 June 2026)
- Letter Historic England (15 June 2026)

- Letter Historic England (11 June 2026)
- Letter Natural England (12 June 2026)
- Email Transport For London (16 June 2026)
- Email Thames Water (10 June 2026)
- Note: Email from Network Rail not included owing to no additional advice received.

[Redacted]

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**From:** [Redacted] >  
**Sent:** 09 June 2026 10:45  
**To:** HNL Sustainable Places; Burchill, Harry; Henderson, Jordan  
**Cc:** [Redacted] Planning Strategy  
**Subject:** RE: EIA Scoping Opinion Request - Sainsbury's, 360 Ealing Road, Alperton, HA0 1PF  
**Attachments:** HNL national preliminary opinion.pdf

Hi Harry,

Thank you for your email, please consider the below as our response to the EIA Scoping Opinion Request:

We have screened the site for constraints in our environmental remit, and these are limited, and therefore we deem the site low risk. The site is situated on an unproductive bedrock aquifer. It is in close proximity to the associated Sainsbury's Petrol Station, and therefore must take appropriate measures to ensure no contamination of groundwater is caused - we recommend the applicants refer to [The Environment Agency's approach to groundwater protection](#) for further guidance.

We are satisfied that contamination/groundwater will be assessed using a preliminary risk assessment, rather than being scoped in to the EIA.

We are also satisfied with the approach to scope flood risk out, and prepare a site specific flood risk assessment.

I've attached a high-level guidance document for consideration.

We look forward to being consulted in later stages of the planning application.

Kind regards,

[Redacted]

[Redacted]

**Planning Specialist**  
**Sustainable Places**  
**Hertfordshire and North London (London)**

**Email -** [Redacted]

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**Tel -** [Redacted]

Working days: Monday to Friday  
Typical Hours : 0730-1600

# Pre-planning application Guidance Note: HNL Area

Last Updated: September 2022

**This guidance has been produced to help you plan and prepare your development proposal.**

**It sets out the environmental issues we expect to be considered as part of a planning application. Please be aware that this guide is not exhaustive and further details may be requested by us at planning application stage to address site specific environmental issues.**

**This guidance is only for use in the Environment Agency's Hertfordshire and North London Area and should be read alongside our detailed national guidance which can be found on the GOV.UK website.**

**It can be used by applicants, developers and consultants at the pre-planning stage.**

## Further bespoke advice

The information provided below details generic information which may or may not be applicable to your development. We can provide bespoke guidance or review technical information prior to the submission of a planning application. This is part of our charged service, which equates to £100 per person per hour plus VAT.

Further engagement at the pre-application stage will speed up our formal response to your planning application and provide you with certainty as to what our response to your planning application will be. It should also result in a better quality and more environmentally sensitive development. As part of our charged for service we will provide a dedicated project manager to act as a single point of contact to help resolve any problems.

If you are interested in finding out more about this service, please email: [HNL SustainablePlaces@environment-agency.gov.uk](mailto:HNL SustainablePlaces@environment-agency.gov.uk).

We also recommend that you consult with the relevant Local Planning Authority (LPA) to ensure that your planning application meets their requirements.

## Section 1: Flood Risk

The National Planning Policy Framework (NPPF) requires development in areas at risk of flooding to be safe and not increase the risk of flooding.

You can view a site's flood zone on the [Flood Map for Planning](#). If your proposed development is located within Flood Zone 2 or 3 you should consult the [Flood Risk and Coastal Change](#) pages of the National Planning Practice Guidance (NPPG).

The guidance will help you determine whether the flood risk vulnerability of your proposed development and the flood zone are compatible. You can also establish if there are flood risk sequential test and exception test requirements for your proposed development. These are summarised in the table below, which is adapted from [Table 3](#) in the NPPG.

Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
<b>Zone 1</b>	✓ Avoid flood risk from sources other than rivers & sea	✓ Avoid flood risk from sources other than rivers & sea	✓ Avoid flood risk from sources other than rivers & sea	✓ Avoid flood risk from sources other than rivers & sea	✓ Avoid flood risk from sources other than rivers & sea
<b>Zone 2</b>	? Sequential Test required	? Sequential and Exception Tests required	? Sequential Test required	? Sequential Test required	? Sequential Test required
<b>Zone 3a</b>	? Sequential and Exception Tests required	X Development should not be permitted	? Sequential and Exception Tests required	? Sequential Test required	? Sequential Test required
<b>Zone 3b</b>	? Sequential and Exception Tests required	X Development should not be permitted	X Development should not be permitted	X Development should not be permitted	? Sequential Test required

### 1.1 Sequential Test

The NPPF and associated NPPG ([Flood Risk and Coastal Change](#) chapter) requires the Sequential Test to be applied to planning applications where development is located within Flood Zone 2, 3a or 3b in the circumstances shown in the table above. The only exceptions are sites allocated in an adopted Local Plan which have already been subject to the test, change of use or [minor development](#).

For the site to pass the Sequential Test it must be satisfactorily demonstrated to the LPA that there are no appropriate alternative sites available for this development at a lower risk of flooding. It is for the LPA to determine if the Sequential Test has to be applied and whether or not there are other sites available at lower flood risk. Therefore, we recommend that you discuss the requirements of the Sequential Test with the LPA at the earliest opportunity.

### 1.2 Sequential Approach

If the Sequential Test is passed then a sequential approach should be applied within the site to direct development to the areas of lowest flood risk (Flood Zone 1 first, followed by Flood Zone 2). If it is not possible to locate all of the development within Flood Zone 1, then the most vulnerable elements of the development should be located in the lowest risk parts of the site.

### 1.3 Exception Test

The Exception Test should only be applied in the circumstances shown in the table above following application of the sequential test. The Exception Test should not be used to justify the grant of planning permission in flood risk areas when the Sequential Test has not been satisfied.

The Exception Test is in two parts and both need to be met for the test to be satisfied. It is for the applicant to demonstrate this to the LPA, but we will provide advice on the second part of the test. The second part requires a site-specific flood risk assessment (FRA) to demonstrate that the new development will be safe over its lifetime (including access and egress), will not increase flood risk elsewhere and, where possible, will reduce flood risk overall. The NPPF states that both parts of this test should be satisfied for development to be permitted.

## 1.4 Inappropriate development in areas at risk of flooding

[Table 3](#) in the NPPG sets out the circumstances where development is inappropriate and should not be permitted.

Flood Zone 3b is land classed as the 'functional floodplain' and is land defined by an LPA's Strategic Flood Risk Assessment (SFRA) as having the highest probability of flooding, and where water has to flow or be stored in times of flood. Only water compatible development and essential infrastructure (subject to the Exception Test) can be acceptable within the functional floodplain.

We would **object in principle** to any development that falls under any other vulnerability classification. It is important to note that the functional floodplain is not separately distinguished from Zone 3a on the Flood Map for Planning. Instead, areas of functional floodplain have been identified by LPAs within their SFRA's.

Highly vulnerable development, which includes caravans, mobile homes and park homes intended for permanent residential use and basement dwellings, is also not acceptable in Flood Zone 3a.

## 1.5 Flood Risk Assessment (FRA) Requirements

A site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3 in accordance with paragraph 167, footnote 55 of the [National Planning Policy Framework](#) (NPPF). In Flood Zone 1, an assessment should accompany all proposals involving: sites of 1 hectare or more; land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use.

In accordance with the NPPF and associated NPPG, a site specific FRA must clearly demonstrate how you intend to manage flood risk on site to ensure that the proposed development will be safe for its lifetime and that flood risk is not increased on site and elsewhere.

The FRA should be appropriate to the scale, nature and location of the development. While it is possible for applicants to undertake their own assessment, most employ suitably experienced professionals. We are not able to recommend specific consultants, but details of competent individuals or companies can be found online.

We would expect your FRA to address (but not necessarily be limited to) the following issues:

- Consideration of the level of flood risk and whether the proposed use would be appropriate in accordance with its vulnerability classification outlined within [Table 2](#) of the Planning Practice Guidance: [Flood Risk and Coastal Change](#) (section 25).
- Identification of the level of flood risk on the site and consideration of the impact a range of flood events would have on the proposed development, including an assessment of the impacts of climate change by selecting the appropriate climate change allowances.

- Confirmation of any flood defences and standard of protection provided, to confirm the level of residual risk in accordance with the Strategic Flood Risk Assessment (SFRA) for the local planning authority in which the development is located.
- Estimation of flood depths at the site for a range of flood events, to calculate internal flood depths and level of refuge required in the event of a breach or failure of the flood defences.
- Appropriate and realistic flood mitigation measures based on flood characteristics at site.
- Details of set back of the development from the riverbank / defence.
- Confirmation that a safe route of access and egress with a 'very low flood hazard' rating in accordance with the guidance document '[FD2320 \(Flood Risk Assessment Guidance for New Developments\)](#)' is achievable.

For further information on our flood map products please visit our [website](#). Guidance on the content of a site-specific FRA can be found on the NPPG and at [gov.uk](#).

We can provide any flood risk information which we have available – such as predicted flood levels and historical flood data – for use in FRAs. Please contact our Customers and Engagement Team at [HNLenquiries@environment-agency.gov.uk](mailto:HNLenquiries@environment-agency.gov.uk) for further details.

## 1.6 Modelling

In some instances a detailed hydraulic model or flood modelling work may be necessary, in particular if there is no available data for the area of your planning application or to take into account correct climate change allowances. Please be aware that if you are required to carry out flood modelling as part of your proposal you will need to submit the flood model files to the LPA as part of your planning application, which will then need to be reviewed by us.

Where modelling is required, we advise you to contact us ahead of submitting your planning application to discuss your modelling requirements and avoid delays when you submit your planning application.

## 1.7 Climate Change Allowances

In order to demonstrate the risks to the proposal over its lifetime, a site-specific FRA must also consider the impact of climate change on future flood risks. The latest guidance on how to apply the correct, up to date climate change allowance for FRAs is available at [gov.uk](#).

## 1.8 Finished Floor Levels

Raising floor levels above the design flood level is the most effective means of ensuring development will not be subject to internal flooding. The finished floor levels of new buildings in areas at a high risk of flooding should be at least 300 millimetres above the design flood level, including an allowance for climate change. Where this cannot be achieved due to other planning constraints, we request that floor levels are set as high as possible (for extensions to existing buildings, no lower than the existing floor levels) and that flood resilience/resistance measures are considered, where appropriate, up to the design flood level.

Where floor levels cannot be raised sufficiently, consideration should be given to the use of flood resilient construction practices and materials in the design and build phase. Choice of materials and simple design modifications can make the development more resistant to flooding and reduce rehabilitation time in the event of future inundation. We may object unless it can be demonstrated that the safety of occupants can be managed by including other flood resilience/resistance measures up to the design flood level.

Detailed information on flood proofing and mitigation can be found on the gov.uk website in the documents [‘Improving the Flood performance of new buildings’](#) and [‘Prepare your property for flooding’](#).

### 1.9 Floodplain Compensation

Your FRA will need to demonstrate that any increase in built footprint within the 1 in 100 year plus climate change flood extent can be directly compensated for, on a volume-for-volume and level-for-level basis to prevent a loss of floodplain storage. If it is not possible to provide level for level flood plain compensation, other forms of mitigation may be considered if agreed with the LPA or there should be no increase in built footprint. It will also need to be demonstrated that the proposed development does not impact the flow and conveyance of water.

The use of voids, stilts or under-croft parking as mitigation for a loss in floodplain storage should be avoided, as they may become blocked over time by debris or domestic effects. We would not recommend these methods to the LPA as an acceptable means of compensation.

### 1.10 Safe Access

During a flood, the journey to safe, dry areas completely outside the 1 in 100 year plus climate change flood extent would involve crossing areas of potentially fast flowing water. Those evacuating on foot in areas where flooding exceeds 100 millimetres or so would be at risk from a wide range of hazards, including for example unmarked drops, or access chambers where the cover has been swept away.

Where safe access cannot be achieved, an emergency flood plan that deals with matters of evacuation and refuge to demonstrate that people will not be exposed to flood hazards should be submitted to and agreed with the LPA.

We recommend that you discuss safe access and egress routes with the local authority emergency planners, as they will be responsible for agreeing to any emergency plan submitted with your application.

### 1.11 Flood Defences (Fluvial)

It should be demonstrated that any flood walls/defences are in good enough condition to protect the proposed development for its lifetime. This is usually 100 years for residential development. This should be submitted in the form of a survey and should include an assessment of any remedial works or flood defence replacement options required to protect the site from flooding for the lifetime of the development.

The FRA should assess the impacts of a failing flood defence (for example, a breach scenario) on the proposed development and demonstrate that there will not be an unacceptable risk of flooding.

### 1.12 Thames Estuary 2100 (Tidal Defences)

In line with requirements set out in the Thames Estuary 2100 (TE2100) plan, any application in this location will need to demonstrate how the flood defence could be raised in the future to meet the demands of climate change.

In addition, any application will need to demonstrate how your proposed development adjacent to flood defences does not have a detrimental impact on the integrity of existing flood defences and should aim to be set back from the banks of watercourses and those defences to allow their

management, maintenance and upgrading in accordance with both the TE2100 plan and London Plan respectively.

In some cases, we hold technical drawings of flood defence structures which may be of use in designing your scheme. To request these, you should contact our customers and engagement team at [HNL enquiries@environment-agency.gov.uk](mailto:HNL enquiries@environment-agency.gov.uk).

### **1.13 Flood Risk Standing Advice for lower risk development**

We have produced a series of standard comments for LPAs and applicants to refer to for lower risk development proposals. These comments replace direct consultation with us. These standard comments are known as Flood Risk Standing Advice (FRSA), and can be found on [gov.uk](http://gov.uk). We recommend that you view our standing advice in full before submitting the required information as part of a planning application. The LPA will then determine whether flood risk has been considered in line with FRSA recommendations.

## Section 2: Main Rivers & Ecology

### 2.1 Flood Risk Activity Permit

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- in, over or under a main river
- on or within 8 metres of the bank of a main river, or 16 metres if it is a tidal main river
- on or within 8 metres of any flood defence structure or culvert on a main river, or 16m for a tidal main river or sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the riverbank, culvert or flood defence structure (16 metres if it is a tidal main river) without planning permission.

Flood risk activities can be classified as: Exclusions, Exemptions, Standard Rules or Bespoke. These are associated with the level of risk your proposed works may pose to people, property and the environment. Further guidance on applying for flood risk activity permits can be found [online](#).

To identify any Main Rivers in proximity to your proposed development please check our Flood Map for Planning.

Where a Flood Risk Activity Permit (FRAP) is required, it is unlikely that our consent will be granted for works that do not allow access for maintenance or repair purpose or that have an unacceptable impact on flood risk or the natural environment. The permanent retention of a continuous unobstructed area is an essential requirement for emergency access to the river for repairs to the bank and for future maintenance and/or improvement works.

Where development or works are proposed that would require a FRAP, it is recommended that detailed planning advice is obtained from us prior to the submission of a planning application. We may object to a planning application if we do not consider that we can issue a FRAP for a development as proposed. The determination of a planning application could be delayed until our concerns are resolved.

FRAPs are required irrespective of any planning permission and are not guaranteed. You should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise you to consult with us at the earliest opportunity.

### 2.2 Ecological Enhancements & Biodiversity Net Gain

Paragraphs 174 and 179 of the National Planning Policy Framework (NPPF) recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused.

We recommend that development proposals protect and enhance the local environment and seek opportunities to enhance ecology and provide Biodiversity Net Gains (BNG). The enhancement of

biodiversity in and around development should be led by a local understanding of ecological networks, and should seek to include:

- habitat restoration, re-creation and expansion;
- improved links between existing sites;
- buffering of existing important sites;
- new biodiversity features within development; and
- securing management for long term enhancement

### 2.3 River Naturalisation and Culverted Watercourses

Development on sites with existing culverts present opportunities for de-culverting as part of the proposal. Deculverting and river restoration will provide environmental improvements and contribute to the delivery of BNG, will help deliver [Water Framework Directive \(WFD\)](#) improvements and will also reduce the risk of flooding. We strongly recommend you consider all options to remove any culverted sections of watercourses as part of your development proposals, restoring the river to its natural state. If deculverting is not possible on the site we would expect to see adequate evidence for this.

We will object to any proposal to culvert main river watercourses. Development that involves culverting for land gain purposes is not sustainable. It works against the natural processes of watercourses and can exacerbate the risk of flooding and increase maintenance costs and complexity. It can also destroy wildlife habitats, hinder fish passage, reduce amenity value, interrupt the continuity of the linear corridor of a watercourse and affect channel stability. It can also significantly reduce resilience to the effects of drought, floods and pollution. Culverting an ordinary watercourse requires the prior consent of the Lead Local Flood Authority.

### 2.4 Buffer Zone

Development adjacent to main rivers should be designed with a naturalised buffer zone of at least 8 metres from the bank top or retaining wall to protect and enhance the conservation value of the watercourse and ensure access for flood defence maintenance. This increases to 16 metres for a tidal main river, and the requirement for a buffer zone also applies to culverted watercourses. Where such a buffer strip does not currently exist, we normally seek to ensure that it is established. In urban areas in particular, rivers have often been degraded by past development, and we expect that any new development should go some way to redress the balance.

The buffer zone should be designed and managed for the benefit of biodiversity and should be undisturbed by development with no fencing, footpaths or other structures. It should not include formal landscaping, and should include the planting of locally appropriate native species. Mowing regimes should be low intensity, allowing plants to flower. Light spill within the buffer zone from external artificial lights should be kept at an absolute minimum and be located and directed so that light levels of 0-2 lux are maintained. The buffer zone will help provide more space for flood waters, provide improved habitat for local biodiversity and allows access for any maintenance requirements.

We recommend that you submit a suitably scaled plan showing the distance of the new development from the watercourse.

## 2.5 Nature Conservation & Ecology Surveys

The presence of a main river on or within 8 metres of your proposed development site means an ecological survey should accompany your planning application to establish whether development is likely to have a detrimental impact on the biodiversity of the watercourse. We would not support development proposals if there was shown to be a likely detrimental impact on the water environment. In accordance with the NPPF, any development proposal should avoid significant harm to biodiversity and seek to provide a net gain in biodiversity. Opportunities to incorporate biodiversity in and around the development will be encouraged where appropriate, see examples in our [Estuary Edges Guidance](#).

If there is the potential for protected species or habitats to be present on or adjacent to the site, as part of your planning application you will need to undertake the necessary ecological surveys / assessments to determine if they are present. Where protected species and / or habitats are present, detailed assessments and mitigation measures may be necessary. We may offer advice in relation to water-based species and / or habitats that are within our remit.

Where protected species or habitats are present, works may also require licensing from Natural England and therefore we recommend you contact Natural England for their advice.

You can find a full list of protected sites, species and the precautions required for planning on the [GOV.UK](#) website.

## 2.6 Water Framework Directive (WFD)

With any development alongside watercourses, consideration should be given to the requirements of the [Water Framework Directive](#) (WFD) which includes causing no overall deterioration in water quality or the ecological status of any waterbody.

Proposed development in close proximity to watercourses may require a [WFD compliance assessment](#). This must assess any potential impacts on the watercourses and demonstrate that the required enhancements will be delivered. Any development that has the potential to cause deterioration in classification under WFD or that precludes the recommended actions from being delivered in the future is likely to be considered unacceptable to us. You will find actions associated with the WFD by searching for your watercourse on the [EA Catchment Data Explorer](#). For further guidance on undertaking a WFD compliance assessment, please refer to [gov.uk](#).

## 2.7 Non-native Species

Development and construction activities may increase the risk of spreading invasive species present within a proposed development site. Where the presence of invasive species is known or suspected, prior to the commencement of development (including ground clearance) we would expect a detailed method statement for the removal or long-term management /eradication of the invasive species on the site to be submitted to and approved in writing by the LPA. This will help prevent the spread while work is being carried out and consider the longer-term management. When visiting any site, work methods must include appropriate biosecurity measures (considered for all potential spread pathways) to prevent the spread and introduction of invasive non-native species in order to avoid contravention of the Wildlife and Countryside Act 1981. Without this, avoidable damage could be caused to the nature conservation value of a site.

## 2.8 Chalk Rivers

A large proportion of the rivers in our area are Chalk streams. Chalk streams are rare habitats and are important for wildlife, supporting some of the UK's most endangered species, and are therefore a priority habitat. This is in accordance with obligations stated in Section 40 of the Natural Environment Research Council (NERC) Act 2006, where chalk streams are one of the

Section 41 habitats of principal importance, and to contribute towards DEFRA outcomes within Biodiversity 2020: A strategy for England's wildlife and ecosystem services. Public bodies have a biodiversity duty under the habitats directive to conserve and provide net gains for biodiversity.

## Section 3: Groundwater Quality and Contaminated Land

### 3.1 Land Affected by Contamination

The NPPF takes a precautionary approach to land contamination. Before the principle of development can be determined, land contamination should be investigated to see whether it could preclude certain development due to environmental risk or cost of remediation.

Where contamination is known or suspected, a desk study, site investigation, remediation and other works may be required to enable safe development (paragraph 183 of the NPPF). The minimum requirements for submission with a planning application are a preliminary risk assessment, such as a site walkover or desk top study.

Site Investigation and Remediation Strategy reports may be required for submission with a planning application for sensitive land use types or where significant contamination or uncertainty is found. Where these reports are missing or where they do not demonstrate no adverse impact on the environment, we are likely to raise an objection to the planning application.

If during site works contaminated material is suspected, you are advised to stop works and seek further guidance. Remediation of contaminated land may require a permit under Environmental Permitting Regulations.

When dealing with land affected by contamination, developers should follow the risk management framework provided in 'Model procedures for the management of land contamination' ([CLR11](#)).

Please also note that any surface water drainage system must not pose a risk to groundwater quality and must not be constructed in ground affected by contamination.

Further guidance can be found at:

- What is [contaminated land](#)?
- [NPPF: Land affected by contamination](#)
- [Environment Agency Land contamination: technical guidance](#)
- [Land contamination risk assessment](#)

We recommend you contact your Local Authority's Environmental Health team who may hold records on known/potential land contamination. Please note our primary concern is with regards to water quality. Your Local Authority's Environmental Health team will advise you on issues related to human health.

### 3.2 Groundwater Protection

Our [groundwater protection position statements](#) set out our position on groundwater protection for a wide range of activities and developments. These cover both planning and permitting.

We have defined Source Protection Zones (SPZs) for 2000 groundwater sources such as wells, boreholes and springs used across the country for public drinking water supply. These zones are more vulnerable to contamination from activities that might cause pollution in the area. The closer the activity to groundwater, the greater the risk.

To see if your proposed development is located within a Source Protection Zone, please use our [online map](#).

We will **object** to the following developments within **SPZ1** in line with our groundwater protection position statements:

- large-scale above or below ground storage of hazardous substances (as may occur at a chemical works or at a petrol filling station)
- new development of non-landfill waste operations where the operation poses an intrinsic hazard to groundwater, for example deposit of waste for recovery activities.
- landspreading of sludge or liquid waste containing significant concentrations of pollutants.
- the locating of any new cemetery or the extension of any existing cemetery, within SPZ1, or 250 metres from a well, borehole or spring used to supply water that is used for human consumption, whichever is the greater distance.

### 3.3 Cemeteries

Development proposals for cemeteries should be avoided in areas where they present a high risk to the water environment. A [groundwater risk assessment](#) should be undertaken to accompany any planning application for a proposed burial site. This should show that there are minimal risks to the environment either at the time of burial, or in the future.

From 1 April 2022, cemeteries with the highest environmental risk are also controlled through the permitting system under the Environmental Permitting (England and Wales) Regulations 2016. If you need to apply for an environmental permit, you must also provide a risk assessment as part of your application.

More information and guidance can be found on the following GOV.UK pages:

- [protecting groundwater from human burials](#)
- [‘The Environment Agency’s approach to groundwater protection](#) – specifically Section L: Cemetery developments

### 3.4 Surface Water Drainage

We recommend the use of Sustainable Drainage Systems (SuDS). These techniques can provide a method for reducing runoff that could otherwise lead to flooding. They can also minimise pollution impacts, improve biodiversity and provide amenity areas.

Where infiltration drainage is proposed, it must be demonstrated that it will not pose a risk to groundwater quality. Infiltration should not be focused in areas where ground contamination has been identified. Surface water infiltrating through contaminated ground can mobilise contaminants and result in pollution of the groundwater. Where necessary, we will seek to control the depths of soakaway systems by recommending maximum penetration depths and a requirement that the water table should not be intersected. In general, groups of shallow soakaways are preferable to one or two deep boreholes.

Where infiltration SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should have a suitable series of treatment steps to prevent the pollution of

groundwater. For the immediate drainage catchment areas used for handling and storage of chemicals and fuel, handling and storage of waste and lorry, bus and coach parking or turning areas, infiltration SuDS are not permitted without an environmental permit.

Please note that we cannot issue an environmental permit for the direct discharge of hazardous substances into groundwater.

Further guidance can be found in our [groundwater protection position statements](#) and the updated [CIRIA SuDS manual](#).

Sustainable Drainage Systems (SuDS) should always be carefully considered in discussions with the Lead Local Flood Authority, who are responsible for providing advice on the management of surface water drainage. You should consult them for their comments on your proposal.

## Section 4: Foul Water Drainage & Water Resources

### 4.1 Foul Water Drainage

Government guidance contained within the [NPPG](#) (Water supply, wastewater and water quality – considerations for planning applications, paragraph 020) sets out a hierarchy of drainage options that must be considered and discounted in the following order:

1. Connection to the public sewer
2. Package sewage treatment plant (adopted in due course by the sewerage company or owned and operated under a new appointment or variation)
3. Septic tank

The first presumption must be to provide a system of foul drainage discharging into a public sewer to be treated at a public sewage treatment works. Only where an applicant can demonstrate to the satisfaction of the LPA that connection to a public sewer is not feasible due to the cost and / or practicability should a non-mains foul sewage disposal solution be considered.

The NPPG states that ‘applications for developments relying on anything other than connection to a public sewage treatment plant should be supported by sufficient information to understand the potential implications for the water environment’. Any planning application which includes a non-mains system should therefore be accompanied by a [foul drainage assessment form](#) (FDA) which provides sufficient information for an assessment to be made of the risks of pollution to the water environment. For the proposal to be acceptable the FDA will need to demonstrate that the proposed system will be viable and will not be detrimental to the water environment.

Where the proposed development involves the connection of foul drainage to an existing non-mains drainage system, the applicant should ensure that it is in a good state of repair, regularly de-sludged and of sufficient capacity to deal with any potential increase in flow and loading which may occur as a result of the development. We have provided [guidance](#) to LPAs on non-mains drainage from non-major development to help them determine these planning applications.

Further information on septic tanks and treatment plants can be found [here](#).

### 4.2 Trade Effluent

Effluent discharged from any premises operating as a trade or industry, and effluent generated by a commercial enterprise where the effluent is different to that which would arise from domestic activities in a normal home, is described as trade effluent.

If you wish to discharge a trade effluent to groundwater or surface water via a non-mains system, you will require a permit under the Environmental Permitting Regulations.

If you wish to discharge a trade effluent to the public sewer, or a private sewer that connects to a public foul sewer, a trade effluent consent or a trade effluent agreement with your water and sewerage company must be obtained before you do so.

If you are not able to discharge effluent it will be classed as waste and you must then comply with your duty of care responsibilities.

### 4.3 Environmental Permitting Regulations (Foul Drainage and Trade Effluent)

Environmental Permitting Regulations require any discharge of sewage or trade effluent made to either surface water or groundwater to be registered as an exempt discharge activity or hold a permit issued by the Environment Agency, additional to planning permission. This applies to any discharge to inland freshwaters, coastal waters or relevant territorial waters.

The granting of planning permission does not guarantee the granting of an Environmental Permit. Upon receipt of a correctly filled in application form we will carry out an assessment. It can take up to 4 months before we are able to decide whether to grant a permit or not.

Where a pre-existing non-mains drainage system is covered by a permit to discharge then an application to vary the permit will need to be made to reflect the increase in volume being discharged. It can take up to 13 weeks before we decide whether to vary a permit.

### 4.4 Water Resources

The Environment Agency 'Water Stressed Areas Final Classification (2013)' is a primary source of evidence that identifies areas of serious water stress where household demand for water is (or likely to be) a high proportion of the current effective rainfall available to meet that demand. The Hertfordshire and North London area (an area served by Affinity Water and Thames Water) is classed as seriously water stressed. This is already having an adverse impact on the ecological health of our rivers, including chalk rivers and water dependant habitats. With the onset of climate change this also has significant implications for our own water use in the future. Securing sustainable supplies is now demanding substantial improvements in the efficiency of water usage across all sectors.

All new homes are required to meet the mandatory national water efficiency standard for consumption as set out in the [Building Regulations](#) of 125 litres/person/day. In some water-stressed areas, LPAs have adopted policies in their Local Plans that require developers to apply the tighter Building Regulations optional requirement of 110 litres/person/day. While the use of the tighter consumption requirement is not required everywhere, we still recommend developers apply it where possible to ensure their schemes minimise their impact on the environment as much as possible by reducing demand for water.

We suggest you submit a [water efficiency calculator](#) report, or equivalent information, at the planning stage to demonstrate compliance with this standard. Achieving these targets can be done with existing technology by installing efficient showerheads, spray taps and low flush toilets. Complex greywater recycling and rainwater harvesting schemes are not typically required to adhere to this water efficiency standard.

We also recommend that new non-residential commercial buildings are required to achieve a BREEAM 'excellent' rating for water efficiency (or an equivalent rating with any successors).

Older buildings are often the least efficient in resource use. We strongly recommend the retrofitting of existing buildings where opportunities arise through refurbishments and changes of use. There are a number of [BREEAM Technical Standards](#) documents to support retrofitting for commercial and residential buildings.

## Section 5: Waste

### 5.1 Development Close to an Existing Permitted Sites

New development in close proximity to an existing waste facility could result in the community at the proposed development being exposed to odour, noise, dust and pest impacts. The severity of these impacts will depend on the size of the facility, the nature of the waste it takes and prevailing weather conditions. If the site operator can demonstrate that they have taken all reasonable precautions to mitigate these impacts, the facility and community may co-exist, with some residual impacts. In some cases, these residual impacts may cause local residents concern, and there are limits to the mitigation the operator can apply. Only in very exceptional circumstances would we revoke the operators permit.

Generally, sensitive development (e.g. occupied buildings) within 50m of such a facility is unacceptable because of the potential impacts to residents that may not be able to be mitigated. If any development is proposed within 50m of such a site at the planning application stage, we may object to the application on this basis.

### 5.2 Waste Management

The CL:AIRE Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/ or land development works are waste or have ceased to be waste. Under the Code of Practice:

- excavated materials that are recovered via a treatment operation can be re-used on-site providing they are treated to a standard such that they fit for purpose and unlikely to cause pollution
- treated materials can be transferred between sites as part of a hub and cluster project
- some naturally occurring clean material can be transferred directly between sites

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

We recommend that developers should refer to:

- the position statement on the Definition of Waste: Development Industry Code of Practice
- The waste management page on GOV.UK

### 5.3 Waste To Be Taken Off-Site

Contaminated soil that is (or must be) disposed of is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of hazardous waste material produced or taken off-site is 500kg or greater in any 12 month period, the developer will need to register with us as a hazardous waste producer. Refer to the hazardous waste pages on [gov.uk](http://gov.uk) for more information.

## 5.4 Environmental Permitting Regulations (Waste)

To see if your proposed development requires an Environmental Permit under the Environmental Permitting Regulations please refer to [gov.uk](http://gov.uk).

As planning and permitting decisions are often closely linked, we have issued [detailed guidance for developments requiring planning permission and environmental permits](#). This guidance explains how, when responding to planning consultations that require environmental permits, we will advise of three possible positions:

- No major permitting concerns
- More detailed consideration is required and parallel tracking is recommended
- Don't proceed – unlikely to grant a permit

We advise joint discussions with the applicant, planning authority and ourselves, as well as parallel tracking of the planning and permit applications where possible. Parallel tracking planning and environmental permit applications offers the best option for ensuring that all issues can be identified and resolved, where possible, at the earliest possible stages. This will avoid the potential need for amendments to the planning application post-permission.

## Section 6: Agricultural Development

### 6.1 Agricultural Buildings

If the buildings are to be used for livestock housing, the operator must ensure that they comply with the relevant regulations regarding the storage of slurry and silage. Any increase in the numbers of livestock may require the construction or expansion of slurry and silage storage facilities.

The operator should ensure that they comply with the requirements of The Water Resources (Control of Pollution) (Silage, Slurry and Agricultural Fuel Oil) (England) Regulations 2010, commonly known as the 'SSAFO regs', and the storage requirements of The Nitrate Pollution Prevention Regulations 2015, commonly known as the 'NVZ regs'.

### 6.2 Slurry Storage

If your livestock produces slurry, you must be able to store the slurry produced in accordance with the regulations on capacity, construction, and the associated calculations and records.

Depending on the relevant regulations, slurry stores must have the capacity to store:

- 4, 5 or 6 months of slurry;
- rainfall expected to enter the store during the storage period including yards and roofs; and
- any wash water or other liquids that enter the store during that period.

If you have poultry manure or other types of solid manure you must store them:

- in a vessel;
- on an impermeable base, with appropriate collection and containment of runoff;
- in a roofed building; or
- in an appropriately located temporary field heap.

If you build a new facility for storing organic manure (i.e. slurry stores or impermeable bases for solid manure) and/or if you substantially reconstruct or enlarge your existing facilities, you must:

- comply with standards set down in the SSAFO Regulations, and
- notify the Environment Agency in writing about your intention to build a new store, or substantially enlarge or reconstruct an existing store at least 14 days before you start construction or reconstruction works.

### 6.3 Silage Storage

All parts of a silo must be resistant to attack. Your silo must have:

- an impermeable base extending beyond any walls
- impermeable drainage collection channels around the outside, flowing into an appropriately sized effluent tank

Further guidance is available at [gov.uk](http://gov.uk).

## Disclaimer

Please note that this document is a response to a pre-application enquiry only and does not represent our final view in relation to any future planning application made in relation to any site. We reserve the right to change our position in relation to any such application. This response is based on current planning policy, associated legislation, and environmental data/information. If any of these elements change in the future then we may need to reconsider our position.

As part of this preliminary response we have not technically reviewed any documents. You should seek your own expert advice in relation to technical matters relevant to any planning application before submission.

If you have any questions, please contact the Hertfordshire and North London Sustainable Places team: [HNL SustainablePlaces@environment-agency.gov.uk](mailto:HNL SustainablePlaces@environment-agency.gov.uk)

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**From:** SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>  
**Sent:** 12 June 2026 12:46  
**To:** Planning Strategy  
**Subject:** 550409 NE response  
**Attachments:** 550409 NE response.pdf

**Categories:** Forwarded

Please find Natural England's response in relation to the above-mentioned consultation attached herewith.

Kind regards,

Officer  
Natural England  
Consultation Service  
Natural England, County Hall, Spetchley Road, Worcester, U.K., WR5 2NP  
**Email:** [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)  
[www.gov.uk/natural-england](http://www.gov.uk/natural-england)



We strongly recommend using the **SSSI Impact Risk Zones** (SSSI IRZs) to decide when to consult Natural England on development proposals that might affect a SSSI. The SSSI IRZs tool is quick and simple to use and gives instant planning advice as a formal consultation response in certain circumstances and can reduce unnecessary delays in the planning process.

Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see [here](#)  
For further information on the Pre-submission Screening Service see [here](#)

Date: 12 June 2026  
Our ref: 550409  
Your ref: Sainsbury's Car Park in Alperton



Brent London Borough Council  
[planningstrategy@brent.gov.uk](mailto:planningstrategy@brent.gov.uk)

**BY EMAIL ONLY**

Consultations  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 900

Dear Sir or Madam

**Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the Town and Country Planning EIA Regulations 2017):** The Proposed Development's design is currently evolving but is likely to comprise up to 725 residential units (Use Class C3), up to 700m<sup>2</sup> of flexible commercial and/or community floorspace (Use Class E, Use Class F1 and F2), and approximately 125 customer car parking spaces in an undercroft area, alongside approximately 20 on-street accessible residential parking spaces. The Proposed Development will comprise six buildings, five of which are residential and one residential amenity building with a maximum height of approximately 29 storeys. The Proposed Development will also include Section 278 highways works, ancillary uses and associated plant.

**Location:** Sainsbury's Alperton, 360 Ealing Rd, Wembley, London, HA0 1PF

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 02 June 2026, received on 02 June 2026.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities based on relevant and up to date environmental information should be undertaken prior to a decision on whether to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

Further guidance is set out in Planning Practice Guidance on [environmental assessment, natural environment and climate change](#).

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

Please note that Natural England must be consulted on Environmental Statements.

Please send any new consultations or further information on this consultation to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours faithfully

  
Consultations Team

## Annex A – Natural England Advice on EIA Scoping

### General Principles

[Schedule 4](#) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation, cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- A non-technical summary of the information
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information

Further guidance is set out in Planning Practice Guidance on [environmental assessment](#) and [natural environment](#).

### Cumulative and in-combination effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

## **Environmental data**

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at <http://www.naturalengland.org.uk/publications/data/default.aspx>.

Detailed information on the natural environment is available at [www.magic.gov.uk](http://www.magic.gov.uk).

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.

## **Biodiversity and Geodiversity**

### **General principles**

The [National Planning Policy Framework](#) (paragraphs 192-196) sets out how to take account of biodiversity and geodiversity interests in planning decisions. Further guidance is set out in Planning Practice Guidance on the [natural environment](#).

The potential impact of the proposal upon sites and features of nature conservation interest and opportunities for nature recovery and biodiversity net gain should be included in the assessment.

Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. [Guidelines](#) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

Local planning authorities have a [duty](#) to conserve and enhance biodiversity as part of their decision making. Conserving biodiversity can include habitat restoration or enhancement. Further information is available [here](#).

### **Designated nature conservation sites**

The proposal is unlikely to adversely impact any European or internationally designated nature conservation sites (including 'habitats sites' under the NPPF) or nationally designated sites (Sites of Special Scientific Interest, National Nature Reserves or Marine Conservation Zones).

### **Regionally and Locally Important Sites**

The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local group and protected under the NPPF (paragraph 192 and 193). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. Contact the relevant local body for further information.

### **Protected Species**

The conservation of species protected under the Wildlife and Countryside Act 1981 and the

Conservation of Habitats and Species Regulations 2017

is explained in Part IV and Annex A of Government Circular 06/2005 [Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System](#).

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted [standing advice](#) for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

### **District Level Licensing for Great Crested Newts**

District level licensing (DLL) is a type of strategic mitigation licence for great crested newts (GCN) granted in certain areas at a local authority or wider scale. A [DLL scheme for GCN](#) may be in place at the location of the development site. If a DLL scheme is in place, developers can make a financial contribution to strategic, off-site habitat compensation instead of applying for a separate licence or carrying out individual detailed surveys. By demonstrating that DLL will be used, impacts on GCN can be scoped out of detailed assessment in the Environmental Statement.

### **Priority Habitats and Species**

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found [here](#). Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to [download](#). Further information is also available [here](#).

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures

- Opportunities for biodiversity net gain or other environmental enhancement

### **Ancient Woodland, ancient and veteran trees**

The ES should assess the impacts of the proposal on any ancient woodland, ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. The [wood pasture and parkland inventory](#) sets out information on wood pasture and parkland.

The [ancient tree inventory](#) provides information on the location of ancient and veteran trees.

Natural England and the Forestry Commission have prepared [standing advice](#) on ancient woodland, ancient and veteran trees.

### **Biodiversity net gain**

Paragraph 193 of the NPPF states that decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Biodiversity Net Gain is additional to statutory requirements relating to designated nature conservation sites and protected species.

Proposals for mandatory biodiversity net gain should be in line with the Environment Act 2021 and supporting regulations. Further information on biodiversity net gain, including [draft Planning Practice Guidance](#), can be found [here](#)

The statutory [biodiversity metric](#), together with ecological advice, should be used to calculate the change in biodiversity resulting from proposed development and demonstrate how proposals can achieve a net gain.

The metric should be used to:

- assess or audit the biodiversity unit value of land within the application area
- calculate the losses and gains in biodiversity unit value resulting from proposed development
- demonstrate that the required percentage biodiversity net gain will be achieved

Biodiversity Net Gain outcomes can be achieved on site, off-site or through a combination of both. On-site provision should be considered first. Delivery should create or enhance habitats of equal or higher value. When delivering net gain, opportunities should be sought to link delivery to relevant plans or strategies e.g. Green Infrastructure Strategies or Local Nature Recovery Strategies.

Opportunities for wider environmental gains should also be considered.

### **Landscape**

#### **Landscape and visual impacts**

The environmental assessment should refer to the relevant [National Character Areas](#). Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

The ES should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by

the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in *Guidelines for Landscape and Visual Impact Assessment 2013* ((3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the [National Design Guide](#) and [National Model Design Code](#). The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

### **Heritage Landscapes**

The ES should include an assessment of the impacts on any land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific, or historic interest. An up-to-date list is available at [www.hmrc.gov.uk/heritage/lbsearch.htm](http://www.hmrc.gov.uk/heritage/lbsearch.htm).

### **Connecting People with nature**

The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 105. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

### **Soils and Agricultural Land Quality**

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon

store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line with paragraphs 187 and 188 of the NPPF. Further guidance is set out in the Natural England [Guide to assessing development proposals on agricultural land](#).

As set out in paragraph 223 of the NPPF, new sites or extensions to sites for peat extraction should not be granted planning permission.

The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES):

- The degree to which soils would be disturbed or damaged as part of the development
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted.

This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see [www.magic.gov.uk](http://www.magic.gov.uk).

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).
- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

Further information is available in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#) and

The British Society of Soil Science Guidance Note [Benefitting from Soil Management in Development and Construction](#).

## **Air Quality**

Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg)<sup>[1]</sup>. A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to

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[1] [Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK](#)

reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NO<sub>x</sub> and SO<sub>2</sub> against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts on air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System ([www.apis.ac.uk](http://www.apis.ac.uk)).

Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - <http://www.scail.ceh.ac.uk/>
- Ammonia assessment for agricultural development <https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit>
- Environment Agency Screening Tool for industrial emissions <https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England <http://www.airqualityengland.co.uk/laqm>

Natural England has produced '[\*Air pollution and development: advice for local authorities. How to assess sector-specific planning applications that could affect air quality on a protected site\*](#)'. This standing advice is to help planning authorities understand the impact on statutory protected sites from particular developments that emit specific air pollutants. The advice covers emissions of ammonia (NH<sub>3</sub>), nitrogen oxides (NO, NO<sub>2</sub> or NO<sub>x</sub>), nitrogen deposition, acid deposition and sulphur dioxide (SO<sub>2</sub>).

The standing advice is Natural England's formal statutory advice and is a material consideration. It provides decision makers with the information needed to fulfil their statutory duties when making decisions on planning applications with potential air pollution impacts.

## **Water Quality**

The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. If your planning application is affected by Nutrient Neutrality, the ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels. These solutions or plans should be relevant to the specific planning consultation site. Further information can be obtained from the Local Planning Authority.

## **Climate Change**

The ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e. what's already there and affected) as well as impacts on how the environment can accommodate change for both nature and people, for example whether the development affects

species ability to move and adapt. Nature-based solutions, such as providing green infrastructure on-site and in the surrounding area (e.g. to adapt to flooding, drought and heatwave events), habitat creation and peatland restoration, should be considered. The ES should set out the measures that will be adopted to address impacts.

Further information is available from the [Committee on Climate Change's \(CCC\) Independent Assessment of UK Climate Risk](#), the [National Adaptation Programme \(NAP\)](#), the [Climate Change Impacts Report Cards](#) (biodiversity, infrastructure, water etc.) and the [UKCP18 climate projections](#).

The Natural England and RSPB [Climate Change Adaptation Manual](#) (2020) provides extensive information on climate change impacts and adaptation for the natural environment and adaptation focussed nature-based solutions for people. It includes the Landscape Scale Climate Change Assessment Method that can help assess impacts and vulnerabilities on natural environment features and identify adaptation actions. Natural England's [Nature Networks Evidence Handbook](#) (2020) also provides extensive information on planning and delivering nature networks for people and biodiversity.

The ES should also identify how the development impacts the natural environment's ability to store and sequester greenhouse gases, in relation to climate change mitigation and the natural environment's contribution to achieving net zero by 2050. Natural England's [Carbon Storage and Sequestration by Habitat report](#) (2021) and the British Ecological Society's [nature-based solutions report](#) (2021) provide further information.

### **Contribution to local environmental initiatives and priorities**

The ES should consider the contribution the development could make to relevant local environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains. This should include considering proposals set out in relevant local strategies or supplementary planning documents including landscape strategies, green infrastructure strategies, tree and woodland strategies, biodiversity strategies or biodiversity opportunity areas.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 15 June 2026 16:13  
**To:** Planning Strategy  
**Cc:** [REDACTED]  
**Subject:** RE: EIA Scoping Opinion Request - Sainsbury's, 360 Ealing Road, Alperton, HA0 1PF  
**Attachments:** Sainsburys Alperton\_HE Scoping Opinion\_150626.pdf  
**Categories:** Forwarded

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Hello,

Thanks for consulting us on the below. Please see the attached letter.

Best wishes,

[REDACTED]  
[REDACTED]  
**Inspector of Historic Buildings and Areas**  
Planning, London & South East Region  
4th fl, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA  
Direct dial: [REDACTED] Mobile: [REDACTED]



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[historicengland.org.uk](http://historicengland.org.uk)

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████████████████████  
Senior Planning Policy Officer  
Neighbourhoods and Regeneration  
Brent Council

Direct Dial: 020 7973 3763

Our ref: PL00802058

15 June 2026

Dear Mr Edwards

**RE: SAINSBURY'S, 360 EALING ROAD, ALPERTON, HA0 1PF  
ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCOPING REPORT**

Thank you for your email of 2 June regarding a request for a Scoping Opinion in respect of an Environmental Impact Assessment (Trium, May 2026) for the proposed redevelopment of the Sainsbury's site in Alperton.

As explained in the report, this residential-led scheme will likely involve the demolition of all buildings on site and the erection of 6 buildings rising to approximately 29 storeys in height. Therefore, due to its overall height, the proposals could affect the setting of various designated heritage assets potentially across a wide area.

In line with the advice in the National Planning Policy Framework (NPPF, December 2024), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

The report states that Built Heritage, Townscape and Visual Impact will be scoped out of the EIA. However, a Heritage, Townscape and Visual Impact Assessment (HTVIA) will be submitted in support of the future planning application which will assess the impact on the historic environment, with reference to the submitted Heritage Asset Plan (p42), from a range of viewpoints including those identified in Annex L. We are broadly content with this approach. However, we recommend that a zone of theoretical visibility assessment is undertaken to identify any other heritage assets that could be affected across a wider area.

In preparation of the HTVIA, we would also draw attention to the following Historic England guidance:



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA  
Telephone 020 7973 3700  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)

*Historic England is subject to the Freedom of Information Act, 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.*

*Historic England will use the information provided by you to evaluate any applications you make for statutory or quasi-statutory consent, or for grant or other funding. Information provided by you and any information obtained from other sources will be retained in all cases in hard copy form and/or on computer for administration purposes and future consideration where applicable.*



LONDON OFFICE

- The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Historic England, 2017)
- Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1 (Historic England, 2016)
- Tall Buildings Advice Note 4 (Historic England, 2022)

Appraisals and management guidelines for nearby and more distant conservation areas may identify specific viewpoints relevant to these proposals, and these should also be considered in consultation with your Council's Conservation Officer.

We await further consultation from your Council in the event of an application being submitted, or from the developers at pre-application stage. If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Please note that these comments do not address archaeology. Please contact my colleague Greer Dewdney in the Greater London Archaeological Advisory Service at [REDACTED] regarding these matters.

Yours sincerely

[REDACTED]  
Inspector of Historic Buildings and Areas

E-mail: [REDACTED]



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700

HistoricEngland.org.uk

*Historic England is subject to the Freedom of Information Act, 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.*

*Historic England will use the information provided by you to evaluate any applications you make for statutory or quasi-statutory consent, or for grant or other funding. Information provided by you and any information obtained from other sources will be retained in all cases in hard copy form and/or on computer for administration purposes and future consideration where applicable.*

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 22 June 2026 19:08  
**To:** Planning Strategy  
**Cc:** Burchill, Harry; [REDACTED]  
**Subject:** RE: EIA Scoping Opinion Request - Sainsbury's, 360 Ealing Road, Alperton, HA0 1PF  
**Attachments:** Response CRTR-PLAN-2026-46880 Sainsburys Alperton EIA Scoping.pdf

Dear Planning team,

Thank you for this recent consultation – apologies, it was logged with our usual 21 days statutory consultee period, so the short deadline was not flagged.

Please find attached my response on behalf of the Canal & River Trust, and feel free to contact me if you have any further queries.

Kind regards,

[REDACTED]  
Area Planner – London

M [REDACTED]

E [REDACTED]

*Please note that I do not work on Fridays*





**Canal &  
River Trust**

Making life better by water

Brent Council  
Planning and Regeneration, Brent Civic  
Centre  
Engineer's Way  
Wembley  
Middlesex  
HA9 0FJ

**Our Ref** CRTR-PLAN-2026-46880

**Monday 22 June 2026**

Dear [REDACTED]

**Proposal:** Redevelopment of the Sainsbury's Car Park likely to comprise up to 725 residential units (Use Class C3), up to 700m<sup>2</sup> of flexible commercial and/or community floorspace (Use Class E, Use Class F1 and F2), and approximately 125 customer car parking spaces in an undercroft area, alongside approximately 20 on-street accessible residential parking spaces.

**Location:** Sainsbury's Car Park and Petrol Filling Station, 360 Ealing Road, Alperton

**Waterway:** Paddington Arm (Grand Union Canal)

Thank you for your consultation.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.

Based on the information available our substantive response, as required by the Town & Country Planning (Development Management Procedure) (England) Order 2015 (as amended), is the following general advice:

**Heritage, Townscape and Visual Impact Assessment (HTVIA)**

Ideally we would want the HTVIA to include viewpoints from the towpath in the vicinity of the existing towpath access gate, east of the Ealing Road bridge and in the vicinity of the Alperton Cemetery.

**Transport**

We note that Traffic and Transport has been scoped out of the EIA, and trust that the subsequent Transport Assessment will adequately address impacts of active travel on the Grand Union Canal towpath.

**Environmental Context**

The environmental context section and diagram does not identify the Grand Union Canal as a Site of Metropolitan Importance for Nature Conservation (London Canals SMINC).

**Canal & River Trust Spatial Planning Team**

**E:** [planning@canalrivertrust.org.uk](mailto:planning@canalrivertrust.org.uk) **W:** [canalrivertrust.org.uk](http://canalrivertrust.org.uk) **T:** 0303 040 4040

## Trust Operations

The Trust use the existing car park as a drop off point for staff, being one of the few spaces in the area available near the canal. It would be helpful to understand if this would be affected and how it could be mitigated for if so.

## Litter

There is also already a litter problem along the canal in this area, which should be considered given the additional numbers of residents and visitors likely to access the canal towpath from the site.

## Lighting

We are pleased to note reference to the Bat Conservation Trust's guide to artificial lighting, given the significance of the Grand Union Canal as a vital dark corridor used by bats and other wildlife for commuting and foraging.

I hope these comments are helpful. Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

██████████ MRTPI  
Area Planner London

██

<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>

**Canal & River Trust Spatial Planning Team**

E: [planning@canalrivertrust.org.uk](mailto:planning@canalrivertrust.org.uk) W: [canalrivertrust.org.uk](http://canalrivertrust.org.uk) T: 0303 040 4040

**From:** [REDACTED]  
**Sent:** 16 June 2026 20:04  
**To:** Planning Strategy <planningstrategy@brent.gov.uk>  
**Subject:** EIA Scoping Opinion Request - Sainsbury's, 360 Ealing Road, Alperton, HA0 1PF

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To whom it may concern,

Thank you for consulting TfL Spatial Planning on the EIA Scoping Opinion.

#### Site Description

The site is accessed off of Glacier Way and Northwick Road, both of which form part of the borough highway network. Adjoining the site on Glacier Way is bus stops, which provides access to three services, and bus stands, and Alperton Station is located within 500m of the site. The site has a PTAL of 4 on a scale of 0 to 6b, where 6b is highest.

TfL Spatial Planning have the following comments:

1. A Healthy Streets Transport Assessment should support any planning application. This should include an Active Travel Zone (ATZ) assessment, which includes a night-time assessment. Further information about the ATZ assessment, including a Night-time ATZ Assessment Advie Note, can be found on the following webpage: [Transport Assessments - Transport for London](#)
2. Cycle parking, both quantum and quality, should be in line with relevant standards.
3. The car-free nature of the residential development is welcomed. The level of parking proposed to be provided for the retail store should be in line with London Plan standards. The level of parking indicated to be provided for the retail store (total of 215 spaces) is above the maximum standards set out in London Plan, and should be reduced.
4. As mentioned above, there is bus infrastructure in proximity to this site. This bus infrastructure should be protected, and where necessary enhanced, as part of this development in line with Policy T3.

5. As with other developments in this area, a contribution towards Alperton Station and bus service enhancements will be sought in line with Policy T4. The level of this contribution can be determined upon submission of a robust and agreed trip generation.
6. The Scoping Note makes reference to highway works being undertaken as part of this development, including reconfiguring Northwick Road. Any changes to the highway network should be supported by a Road Safety Audit (RSA) at the planning stage to ensure that the decision maker is fully aware of any safety implications caused as a result of such changes. Further information should be provided on the highway works to identify any highway modelling requirements for this site.
7. A Construction Logistics Plan (CLP) should be provided to support any planning application for this site. TfL will require a full CLP to be secured through condition, in line with Policy T7 of the London Plan. In line with Policy T7, a commitment to avoid deliveries during the peak hour will be sought. Appropriate measures will also need to be incorporated to ensure that this activity does not adversely impact on bus operations, and accessibility to bus infrastructure, in proximity to the site.
8. A Delivery and Servicing Plan (DSP) should be submitted and secured through condition. It must be demonstrated how delivery and servicing activity at this site is carried out in accordance with the Mayor's Vision Zero and Healthy Streets approach prioritising active travel modes over vehicular movements.
9. A Framework Travel Plan for the site should be produced in accordance with TfL's guidance for travel planning, with a commitment to provide Travel Plans for the different elements of the development once the occupiers are known.
10. A Parking Design and Management Plan (PDMP) should be produced and submitted in support of any planning application for this site. This should indicate initiatives to coincide with mode share target for 2041, as set out in Policy T1.
11. In addition to the various transport contributions that will be secured as part of the S106, the site is liable to pay Mayoral CIL2 and this is subject to indexation and the applicant should be fully aware of the regulations.

There are a number of transport matters that need to be addressed prior to the submission of any planning application for this site. It is strongly advised that the applicant seek to engage with TfL further through their own pre-application service. Further detail on this matter can be found on the following webpage: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/pre-application-services>

Please do not hesitate to contact me if I can be of further assistance.

Many thanks,

 (she/her/hers)  
**Principal Area Planner**  
Spatial Planning | City Planning



  
TfL Spatial Planning is committed to equity, diversity and inclusion and we strive to ensure that Londoners are fully represented in the planning process

For more information regarding TfL Spatial Planning, including TfL's *Transport assessment best practice guidance* and pre-application advice please visit: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/pre-application-services>

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**From:** [REDACTED] <> on behalf of Town Planning NWC  
<TownPlanningNWC@networkrail.co.uk>  
**Sent:** 03 June 2026 10:44  
**To:** Planning Strategy  
**Subject:** Brent Sainsburys, 360 Ealing Rd Alperton EIA Scoping Opinion car park redev  
**Categories:** ACTIONED, Forwarded

OFFICIAL

**Please ensure that from now on ALL planning applications & ALL planning policy notifications are issued to this new address ONLY:**  
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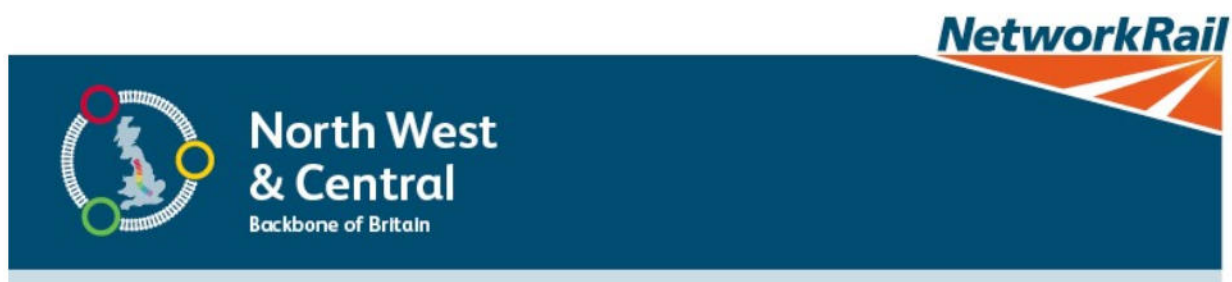
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**Brent Sainsburys, 360 Ealing Rd Alperton EIA Scoping Opinion car park redev**

Regarding the above proposed EIA development, Network Rail has no objections.

**From**

[REDACTED] RTPI Tech  
Town Planning Technician NWC  
Network Rail Property (NW&C)  
Square One, 4 Travis Street, Manchester M1 2NY  
Email address for all applications and notifications: [TownPlanningNWC@networkrail.co.uk](mailto:TownPlanningNWC@networkrail.co.uk)



**From:** devcon.team@thameswater.co.uk  
**Sent:** 10 June 2026 08:29  
**To:** [REDACTED]  
**Subject:** 3rd Party Planning Application - N/A

Brent Council, Development Control, , Wembley, Middx, HA9 6BZ

10 June 2026

**Our DTS Ref:** 80807  
**Your Ref:** N/A

Dear Sir/Madam,

Re: SAINSBURYS MAIN CAR PARK , EALING ROAD, WEMBLEY, Greater London Authority, HA0 1PF

**Waste Comments:**

Waste Comments: Thank you for giving Thames Water the opportunity to comment on the above application. Thames Water are the statutory sewerage undertaker for the area and would like to make the following comments: The EIA Regulations 2017 set out in Schedule 4 that water and wastewater issues may need to be covered in an EIA. Thames Water consider the following issues should be considered and covered in either the EIA or planning application submission: 1. The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met 2. The surface water drainage requirements and flood risk of the development both on and off site and can it be met. 3. Build – out/ phasing details to ensure infrastructure can be delivered ahead of occupation. 4. Any piling methodology and will it adversely affect neighbouring utility services. Should the developer wish to obtain information on the above issues they should contact our Developer Services department on 0800 0093921

**Water Comments:**

Water Comments: With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

**Supplementary Comments:**

Yours faithfully,  
Development Planning Department

Development Planning,  
Thames Water,  
Maple Lodge STW,  
Denham Way,  
Rickmansworth,

WD3 9SQ,  
Email: [devcon.team@thameswater.co.uk](mailto:devcon.team@thameswater.co.uk)

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