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Our Ref: WIE10740-100-F-002-PC

Date: 22 December 2015

Victoria McDonagh
Planning & Regeneration
Civic Centre
Engineers Way
Wembley
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By email and post

Dear Victoria

**Re: Town and Country Planning (Environmental Impact Assessment) Regulations, 2011:
Part 2 Regulation 5 - Request for an EIA Screening Opinion for the redevelopment of Minavil
House, Ealing Road, Alperton**

Waterman Infrastructure & Environment Ltd ('Waterman IE') write on behalf of our client CML Limited (hereafter referred to as 'the Applicant'), to formally request a Screening Opinion pursuant to Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended 2015)¹ ('The Environmental Impact Assessment (EIA) Regulations'), in relation to the redevelopment of Minavil House, Ealing Road, Alperton (hereafter referred to as the 'Site').

The Applicant intends to submit a full planning application for the redevelopment of the Site (hereafter referred to as the 'Development'). Whilst the design of the Development is not yet fixed for the purposes of the full planning application the information provided to Waterman IE and contained herein is considered to be adequate to establish the likely environmental effects of the proposed Development and to advise on the scope of environmental planning deliverables.

The current description of Development is:

'Demolition of existing buildings and the construction of a mixed use building up to twenty six storey development. The scheme comprises of a supermarket and a mix of 263 residential units comprising a mix of one, two and three bedroom flats, a café/community facility and an office.'

This request for Screening should be read in conjunction with the following Figures contained in **Annex 1**:

Figure 1: Site Location Plan

Figure 2: Site Boundary

The Site and its Setting

The Site is located in the south of the London Borough of Brent (LBB) in Alperton. The Site area is approximately 0.48 hectares (ha). The Site currently comprises an electricity substation and 1960's light industrial building containing vehicle repair workshops and associated parking. The Site is bounded by the Grand Union Canal to the south, Bridgewater Road to the west, Ealing Road to the north and Rosemont Road to the east.

With reference to the EIA Regulations, the Site is **not** within a 'sensitive area' defined as:

- Sites of Special Scientific Interest (SSSI) or any consultation area around an SSSI.
- Land to which Nature Conservation Orders apply

¹ HMSO (2015); Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended 2015).

- International conservation sites.
- National Parks.
- Areas of Outstanding Natural Beauty (AONBs).
- World Heritage Sites (WHSs).
- Scheduled Monuments (SMs).

The Site is well served by transport links, with the Alperton Underground station which is on the Uxbridge branch of the Piccadilly line, within a minute's walking distance from the Site. The Site has a public transport accessibility level (PTAL) rating of 5.

A desk based review of the Site and its environs reveals that the Site is located in Brent Air Quality Management Area (AQMA) for both Particulate Matter (PM₁₀) and Nitrogen Dioxide (NO₂).

There are no Listed Buildings or Scheduled Monuments on the Site; the nearest Listed Building is approximately 1km south east of the Site while the nearest Scheduled Monument is the medieval moated site at Sudbury Golf Club approximately 1.2km north-west of the Site.

The closest Conservation Area to the Site is the Wembley High Street Conservation Area approximately 2km north-north east. The closest ecological designations are the Grand Union Canal which borders the Site is a Metropolitan Site of Nature Conservation Importance (SNCI), two Local Nature Reserves (LNR) within 1.5km of the Site: Foxwood and Perivale Wood, and Brent Reservoir Site of Special Scientific Interest (SSSI) which is located approximately 4.2km north east of the Site.

Consented Application

The Site has extant planning consent (Application 10/0245 approved on 07/12/2011) for a retail unit (A1), office space and 55 residential units over 11 storeys. The extant consent was granted prior to the publication of the Alperton Masterplan Supplementary Planning Document (SPD) and as a result falls below the expectations for height, density and land use. On this basis and a result of a changing economic climate the consent has not been implemented.

Proposals

The proposed Development would consist of the demolition of all existing buildings on-Site and the construction of a supermarket (approx. 1,500m² GIA), 263 residential units comprising a mix of one, two and three bedroom flats, a café/community facility and an office, communal amenity spaces and landscaping.

Determining whether an Environmental Impact Assessment is required

To determine whether the Development is captured by the EIA Regulations and therefore requires to be subject to the full EIA process, reference has to be made to the EIA Regulations.

In particular, consideration has been given to whether the Development is:

- Schedule 1 development – in which case EIA is always necessary; or
- Schedule 2 development – in which case EIA is necessary only if the development is likely to have significant environmental effects as referenced in Schedule 3 of the EIA Regulations.

The proposed Development does not meet any of the categories of development in Schedule 1 of the EIA Regulations. However, the proposed Development is considered to fall within Schedule 2 of the Regulations, 10b 'Urban Development Project':

"10. (b) Urban development projects...[where]...;

- (cc) The development includes more than 1 hectare of urban development which is not dwelling/house development; or*
- (ii) the development includes more than 150 dwellings; or*
- (iii) the overall area of the development exceeds 5 hectares."*

The Development falls below the indicative threshold as the Site area is 0.48 ha. However, in excess of 150 are proposed. Nevertheless, based on the guidance provided in the Planning Practice Guidance each development needs to be considered on its own merits. As such, Schedule 3 of the EIA Regulations

needs to be considered to determine whether the proposed Development should be subject to formal EIA.

Following consideration of Schedule 3 of the EIA Regulations, it is concluded that the Development would **not** require an EIA, and the full planning application need not be subject to the full EIA process. Justification is provided in **Annex 2**.

Conclusion

Given the nature of the Development and lack of sensitivity of the Site and the immediate surroundings in EIA terms, it is concluded that any effects of the Development will be local to the Site and its immediate surroundings and no 'significant environmental effects' are likely to arise.

For the reasons set out above and in **Annex 2**, these effects are not considered 'significant' or of an unusually complex nature. Any effects will be of local importance and, as a result, the likely effects are capable of being properly considered as part of the normal Planning Application process and **do not** warrant an EIA. In addition, in order to accord with various planning requirements, it is acknowledged that the full planning application should be supported by the following suite of environmental technical studies. Further detail is provided in **Annex 2**:

- Construction Environmental Management Plan (CEMP).
- Energy / Sustainability Statement.
- A Townscape Assessment.
- A Transport Assessment (including Residential and Staff Travel Plans, draft Construction Traffic Management Plan and Service and Delivery Plan).
- A Noise and Vibration Impact Assessment.
- An Air Quality Assessment.
- A Preliminary Environmental Risk Assessment (PERA).
- A Preliminary Ecological Appraisal & Bat Survey Report.
- A Wind Report.
- Tree Survey and Arboriculture Impact Assessment.
- A Flood Risk Assessment with Drainage Strategy (including details of SuDS, foul and surface water disposal).
- An Archaeological Desk-Based Assessment.
- A Daylight and Sunlight Assessment.

We trust the information provided within this letter and the enclosed Annexes is sufficient for LBB to provide a Screening Opinion within three weeks of receipt of this letter. Should you require any further information to assist in formulating your Screening Opinion, please do not hesitate to contact us.

Yours sincerely



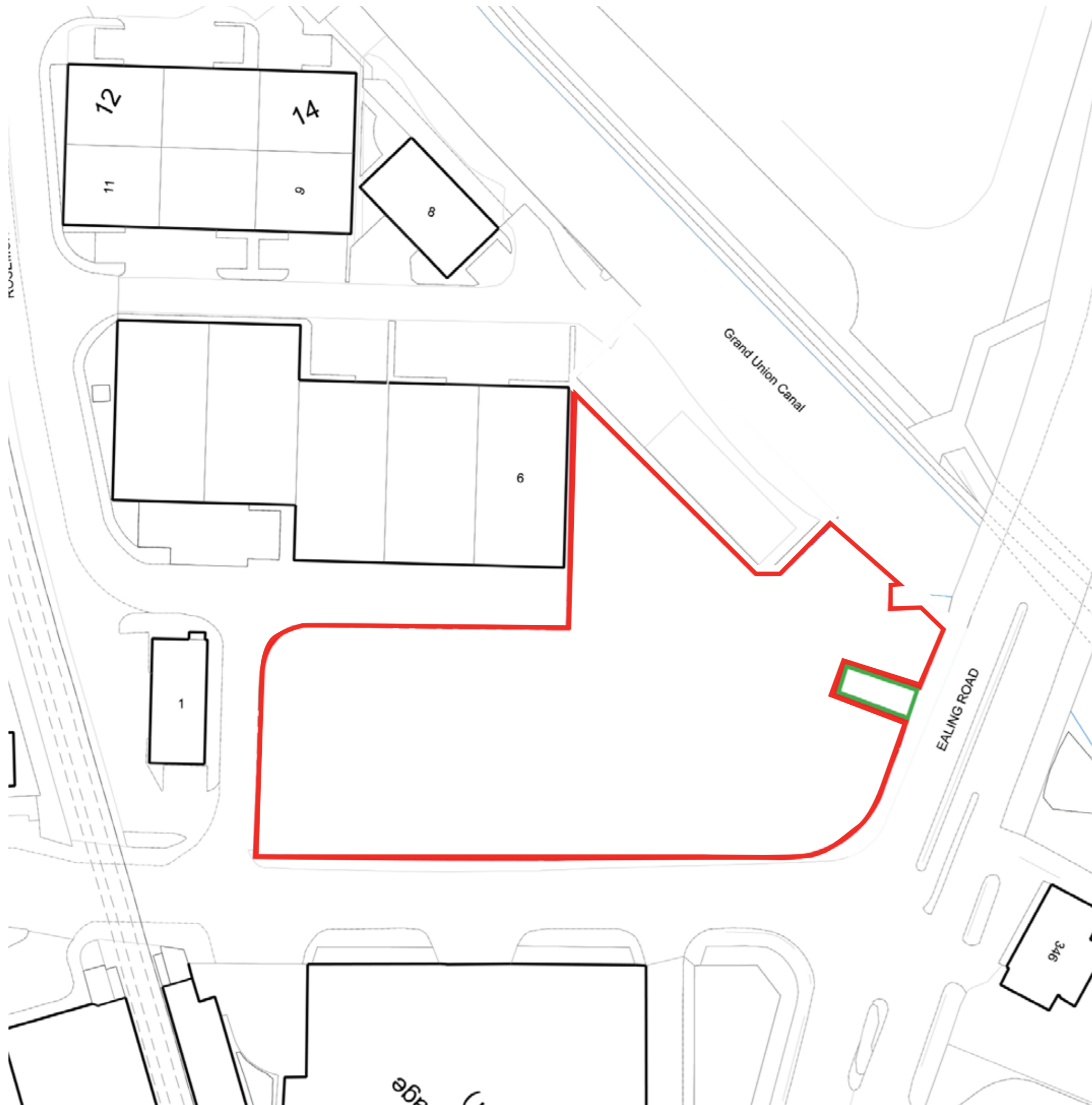
Polly Clifton
Principal Consultant
For and on Behalf of Waterman Infrastructure & Environment Ltd

Enc: Annex 1: Figures
Annex 2: Consideration of Schedule 3 EIA Screening Criteria

cc. Danny Hazlehurst - R55
Alison Mackay - Colliers International



Annex 1: Figures



- Minavil House Boundary
- Substation

Project Details	WIE10740-100: Minavil House
Figure Title	Figure 2: Site Boundary
Figure Ref	WIE10740-100_GR_SL_2A
Date	December 2015
File Location	\\s-inc\wiel\projects\wiew10740\100\graphics\issued figures

Annex 2: Consideration of Schedule 3 EIA Screening Criteria

1. Characteristics of the Proposed Development

With reference to the selection criteria listed in Schedule 3 of the EIA Regulations, the characteristics of the Development are set out below:

- a) The area of the proposed Development is approximately 0.48 ha and would comprise of the demolition of the existing 1960's light industrial building and relocation of the electricity substation.

The current proposals include for a single Building up to 26 storeys with approximately 1,500 m² GIA of supermarket space, 263 1 to 3 bed residential units, a café/community facility and an office, private and communal amenity space along with car parking for 35 spaces for the supermarket and disabled residents.

- b) The potential for cumulative effects is described in **Section 3(m)**.
 - a) The Development will not result in the significant loss of resources considered to be scarce. The energy efficiency of the Development will be in line with local and national policy and Building Regulations. The use of natural resources will be typical for an urban development project such as that proposed, as will the production and management of waste.
 - b) Best practice construction waste management will be employed to minimise the construction waste arising's. The construction works will also be subject to a Construction Environmental Management Plan ('CEMP') which will employ legislative and best practice management to minimise the adverse effects of construction as far as practicably possible. Once operational, sufficient storage facilities will be provided within the Development in line with local planning authority requirements to ensure high levels of recycling would be achieved. Refer to **Section 3 of Annex 2** for further consideration of waste.
 - c) Possible noise and air pollution / nuisances arising from building plant and light pollution during both construction and the completed Development will be subject to regulatory controls, to ensure that any adverse pollution / nuisance effects are avoided or reduced to an acceptably low level. The noise and air quality levels resulting from this Development are unlikely to significantly change from the existing situation.
 - d) Following completion of the Development, as the proposals comprise non-industrial development, the risk of accidents in relation to hazardous or dangerous substances will be low. During the construction works, the implementation of the aforementioned CEMP will ensure that any hazardous materials on Site, including asbestos, be removed in an appropriate manner and by licenced contractors.

2. Location of Development and Site Context

With reference to the criteria in Schedule 3 of the EIA Regulations, the sensitivity of the geographical area likely to be affected by the Development must be considered. This is discussed below:

- a. The Site is located within the administrative boundary of LBB and is approximately 0.48 ha, currently comprising of an electricity substation, 1960's light industrial building containing vehicle repair workshops. The Site is bounded by the Grand Union Canal to the south, the Bridgewater Road to the east, Ealing Road to the north and Rosemont Road to the east. Rosemont Road provides access from Ealing Road to the Alperton Wharfside, a light industrial park.

To the south of the Grand Union Canal, a development of 441 residential units is currently close to completion at 243 Ealing Road (Planning Ref: 09/2116) which ranges in height from 6-14 storeys. To the south-west of the Site beyond the canal is Peppermint Heights, a 14 storey block of flats that was recently refurbished. To the east, beyond the Alperton Wharfside Industrial Estate, lies recent residential development along Atlip Road.

The nearest accessible greenspace to the Site is the Grand Union Canal.

Transport links close to the Site include the North Circular and M40 corridor which are within 2 miles, Alperton Underground Station is approximately 40m north of the Site boundary providing access into central London via the Piccadilly Line. The Site has a PTAL rating of 5 which is classified as very good.

There are a variety of local amenities to the Site, however the larger urban hubs of Wembley, Harrow and Brent Cross are all easily accessible via public transport.

The Site is identified within the Alperton Masterplan Supplementary Planning Document (SPD) (2011) as allocated within a growth area (SSA-A4).

The Site is also part of the wider Alperton regeneration area, as adopted Alperton Masterplan. It acts as a prominent gateway to the regeneration area being located at a strategic location in close proximity to a number of other residential led mixed use developments. In August 2015 Alperton was granted a New Homes Zone by the GLA.

Proposals at the Site have been developed in conjunction with the above allocations as well as in context of the existing and proposed uses of the surrounding land.

- b. The quality and regenerative capacity of natural resources in the area will not be impacted significantly given the existing land uses and the scale of the proposed Development.

A desk based review of the Site and its environs reveals that the Site is located in Brent AQMA for both PM₁₀ and NO₂.

- c. The Site is not located within, nor does it contain, any scheduled monuments or Archaeological Priority Zones. The nearest conservation area is the Wembley High Street Conservation Area approximately 2km north-north east of the Site.

There are no Listed Buildings or Scheduled Monuments on the Site; the closest designated is Grade II Listed Church of St Mary, Brentmead Gardens located approximately 1km to the south-east. The nearest Scheduled Ancient Monument is the medieval moated site at Sudbury Golf Club approximately 1.2km north west of the Site.

There are no statutory ecological designations either at or in close proximity to the Site, the closest statutory ecological designation is Brent Reservoir Site of Special Scientific Interest (SSSI) approximately 4.2km north east of the Site.

The Site is not located in a nature reserve nor is it located in a nationally designated area such as a Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC), Special Protection Area (SPA), National Parks, Area of Outstanding Natural Beauty (AONB), National Nature Reserve (NNR) or Ramsar Site. The Grand Union Canal to the south of the Site is designated as a Site of Metropolitan Importance.

3. Characteristics of the Potential Effects

The range of potential environmental effects associated with the Development is considered as follows:

a. Townscape, Heritage and Visual

The Site is not located close to any areas of sensitive townscape character or heritage. There are no World Heritage Sites (WHS) within 1km of the Site. The Site is not located near any Scheduled Monuments or Listed Buildings. There are no registered parks or gardens in the vicinity of the Site. The Site is not located in or close to a Conservation Area.

The Site is previously developed land and is urban in character. Currently the Site consists of a two storey office and business building fronting Ealing Road. The surrounding townscape is currently mixed with predominantly low rise office and light industrial uses immediately to the north, east and west while there has been substantial development of areas to the south of the Site, resulting in medium to high rise modern residential led properties on either side of Bridgewater Road and south of the Grand Union Canal. The Site is not in any Protected Views or Protected Vistas.

As the buildings on Site have no historic or architectural merit, they would be replaced with new buildings for the food store and residential uses. The proposed new building would be of high architectural quality and range in height to a maximum of 26 storeys. The new building would provide private and shared amenity space as well as increasing public access to the north bank of the Grand Union Canal.

The Development would result in both temporary townscape and visual changes during the construction works and permanent change to the character of the Site on completion of the Development. There will be changes in views from a number of locations around the Development, for example looking towards the Site from the north and south of the A4005 (Ealing Road/ Bridgewater Road), from Alperton Station and from the Grand Union Canal.

The design and nature of the proposals will complement the urban character of the area. Development of the scale and type proposed would be consistent with other developments in the surrounding townscape.

In terms of the magnitude of change, this is likely to be assessed as 'high' for local visual and townscape impacts (ie close to the Site), but diminishing rapidly with distance. This is due to the presence of intervening buildings and structures, and the fact that the new tall building would be an incremental addition to a group of existing tall buildings, rather than a new 'stand-alone' building in the townscape.

The Development fulfils the criteria suggested in the Alperton Masterplan SPD; that proposals may include an appropriate tall building located towards the apex of Ealing Road. Tall buildings are already a characteristic of this townscape. The townscape and visual effects of the proposal will therefore be limited, and not significant.

Details of the design, visual and townscape effects of the Development proposals will be assessed fully in the Townscape Assessment and the Design and Access Statement submitted as part of the Planning Application.

b. Transport and Access

There are currently in the region of 40 car parking spaces on-Site. Given the nature of the land uses at the existing Site, the existing land uses are likely to generate a number of vehicular trips throughout the day, which access the Site via Rosemont Road. MCC survey data collected in 2005 demonstrates that a total of 77 two-way vehicle trips are made on Rosemont Road during the AM peak and 132 during the PM peak.

During the demolition and construction works there is likely to be a short term, temporary increase in local traffic, including heavy goods vehicles, as a result of the transportation of building materials, workers and other deliverables. This is likely to result in some temporary, localised disruption to road users. However, these temporary, short term effects would be typical of any construction project and could be effectively managed through the implementation of standard best practise construction traffic management. This could be achieved via the implementation of a pre-agreed Traffic Management Plan which would form part of a CEMP.

The overall level of parking for the proposed Development has been based on operational needs and within regional and national guidance standards. Similar to the extant planning permission for the Site (LBB ref 10/0245) which allowed the provision of '35 off-street parking space [and] cycle storage areas', the current proposed Development would also provide for 35 car parking spaces including five disabled spaces (three of which will be allocated for the residential use and two for the food store). Of the three residential disabled spaces, one will be an accessible car club space. In Alperton's Masterplan Supplementary Planning Document (SPD), the area is set out to have an average of 0.4 spaces per residential unit, the fact that the proposed Development residential element is almost car free is well below this average set out in the SPD.

Vehicular access for the proposed foodstore will be provided via Rosemont Road, as per the existing vehicular access arrangements for the Site. Pedestrian access will be provided at the front of the proposed development on the corner of A4005 Ealing Road and A4089 Ealing Road. The pedestrian access to the Site will be further enhanced through improvements to the Ealing Road/Bridgewater Road junction and the Ealing Road/Rosemont Road junction, with increases in the footway adjacent to the Site on Ealing Road with the offer of land currently with the Site's ownership for adoption as public highway (footway).

Initial analysis has indicated that the car-free nature of the residential development means vehicular trips to the residential element of the Site will be minimal and will not have a material impact on the local highway network. A percentage of vehicular traffic associated with food retail unit will be existing trips on the local highway network; traffic attraction to food retail developments rarely represent new trips on the wider highway network, with food retail traffic attraction made up of existing trips diverting to the new development from current destinations. The retail use is unlikely to have a significant effect upon the local highway network due to the nature of the trips and the removal of existing trips to and from the existing Site.

In addition, pedestrian access to the Site will be enhanced with improvements proposed to the Ealing Road/Bridgewater Road junction and the Ealing Road/Rosemont Road junction, with increases in the footway adjacent to the site on Ealing Road.

The Site has very good accessibility to public transport with a range of options accessible within a short walking distance (particularly the proximity to Alperton Underground Station and bus stops). It is therefore anticipated that the very good access to public transport will mean that despite an increase in residents at the Site private car trips associated with the food store operation will be very limited with a percentage of car trips associated with the food store anticipated to be pass-by and diverted trips, and so already present on the highway network.

By matter of comparison, survey data of a Lidl food stores at Stonefield Way Ruislip suggests that over half of the trips to the store will be made by public transport, or on foot or bicycle. Given the location of the Site and its close proximity to a large residential catchment, there is considered to be potential for these sustainable modes to represent a larger share of the modal split of customers to the retail unit.

In addition the proximity and frequency of underground and bus services in the vicinity of the Site, along with the anticipated large number of cyclists and pedestrians using the Site mean that it is unlikely that there would be significant effects on public transport capacity.

Servicing of the food store and refuse collections for the residential elements of the Development will be accommodated within the Site boundary. The store is anticipated to receive only one/two HGV delivery per day (one arrival and one departure) carrying the required stock for the food store and remove the waste products once deliveries are completed. All service vehicles will enter and exit the Site in forward gear and tracking of movements will be undertaken. As such activities are expected to be in very small numbers, they will not significantly change traffic flows in the area given the nature and proximity of main roads and existing road activity.

The design of the proposed Development includes introduction of cycle parking, public realm improvements that will benefit both new and existing residents as well as increasing accessibility for pedestrians to the Grand Union Canal.

Although the proposed Development is not anticipated to generate any significant transport and access effects, a Transport Assessment (including Residential and Staff Travel Plans, draft Construction Traffic Management Plan, draft Car Park Management Plan and Service and Delivery Plan) would be submitted with the detailed Planning Application in accordance with current planning policies, Transport for London's (TfL) best practice guidance and LBB's requirements.

c. Noise and Vibration

Existing noise sources on and surrounding the Site mainly include road traffic noise from the A4005 (Ealing Road/ Bridgewater Road) running along the south western boundary to the Site and Ealing Road running along the north westerly boundary of the Site. The closest existing residential receptors to the Site are the residents at 243 Ealing Road to the south of the Site across the Grand Union Canal.

During construction, there would likely be a short-term, temporary increase in noise levels as a result of construction plant, equipment and delivery vehicles. These temporary, short term effects would be typical of any construction project and may lead to some localised disturbance to the neighbouring residential and commercial properties. The noise and vibration effects could be effectively managed through the compliance with legislative requirements via the implementation of environmental management control measures detailed within the CEMP.

Parking at the Site will be limited to the food store element of the Development, with the exception of mobility impaired spaces and car club spaces. Due to the good access to public transport, provision of cycle parking and lack of car parking spaces it is anticipated that the residential elements of the Development are unlikely to have significant effects on existing vehicle flows on nearby roads. It must be noted that vehicular activities associated with the food store can be expected to be small in numbers, however due to the nature and proximity of nearby main roads (A4005 (Ealing Road and Bridgewater Road) and Ealing Road), these activities are unlikely to significantly affect road and traffic flows. As a result it is considered unlikely that the Development would generate significant additional traffic, thereby not giving rise to any additional traffic related noise.

Although there would be some noise resulting from the operation of mechanical plant and building services, it is anticipated that most of the plant and servicing would be contained within the space allocated for plant on the lower ground floor and first floor. The majority of the plant would therefore be situated internally and away from receptors such that noise would cause a significant disturbance. In addition, standard, tried and tested conditions can be applied to a planning permission that can be relied upon to reduce noise from fixed plant to prescribed levels, in accordance with standard planning policy so that no adverse effects would result.

From review of the Site and the area surrounding the Site, there appears to be no significant vibration generating sources (e.g. LUL and Mainline Rail Lines) proximate to the Site (<25m). Vibration is therefore highly unlikely to give rise to any issues.

The design of the residential elements of the Development have included sufficient levels of sound insulation to ensure appropriate residential amenity. The design and selection of plant (during demolition and construction), associated with the operation of the Development, has taken into consideration effects on existing or future residents.

In view of the above, it is considered unlikely that the Development would give rise to significant adverse noise and vibration effects to local receptors. However, a Noise and Vibration Technical Assessment would be submitted with the full planning application to provide an evaluation of prevailing noise levels in demonstrating suitability of the Development's proposed uses against relevant and credited guidance (NPPG²; BS 8233:2014³ and BCO, 2014⁴) and the requirements of LBB.

² Department for Communities and Local Government, 2014. *Noise*. Available from: <http://planningguidance.planningportal.gov.uk/blog/guidance/noise/>

³ British Standard Institute (BSI) (2014); BS 8233 'Guidance sound insulation and noise reduction for buildings. BSI

⁴ British Council for Offices (2014); Guide to Specification 2014.

d. Air Quality and Climate

The Site of the proposed Development is within Brent AQMA in relation for PM₁₀ and nitrogen dioxide NO₂ with the key air quality issue relating to road transportation emissions.

During the demolition and construction works, construction traffic, plant and activities would give rise to some emissions to air, including the potential to generate nuisance dust to neighbouring commercial occupiers and residents. However, these temporary effects would be expected at any construction site and would be minimised through compliance with legislative requirements and the implementation of environmental management control measures detailed within the CEMP. These effects are unlikely to be significant.

Low levels of car parking amenity and high levels of accessibility to public transport from the Site will encourage residents and food store users not to use vehicles and therefore the completed Development is unlikely to significantly increase levels of pollution from traffic.

Although the Site is within an AQMA, it is considered highly unlikely that the Development proposals would significantly affect local air quality. This is for the following reasons:

- Car parking provision is low and additional operational traffic associated with the food store is anticipated to be limited.
- The proposals do not include any industrial processes.
- Existing plant would be replaced by newer / more efficient plant.

The scale of the proposed Development is such that the effect it would have on global warming would be immeasurable and therefore unlikely to be significant.

e. Ground Conditions and Contamination

In line with the National Planning Policy Framework (NPPF), a Phase 1 Preliminary Environmental Risk Assessment (PERA) has been carried out and will be submitted with the planning application to set out the potential contamination risks posed to various receptors.

Ground conditions encountered beneath the Site during a 2009 investigation by Arcadis were found to comprise made ground (typically black sandy gravel and brown gravelly clay, with gravel comprising fragments of brick, tile, plastic, concrete, wood and glass) underlain by London Clay (firm, becoming stiff to very stiff clay proven to 25m below the site).

Historic maps indicate the Site was developed into industrial use in the late 1890s and had various industrial uses (including a sawmill, carpet works and electrical engineering works) until the current building was constructed between 1963 and 1970, when it was in light industrial use. The surrounding area has seen constant development with surrounding historical uses including a chemical works, sewage works and various factories.

The exploratory ground investigation in 2009 identified elevated levels of hydrocarbons (including polycyclic aromatic hydrocarbons (PAHs)) and inorganic determinants (including mercury) in soils, elevated heavy metals and PAH concentrations in groundwater, but no evidence of ground gas impacts above action thresholds. However, given the exploratory scope of analysis, the effect on end users of the Site could not be fully ascertained. In addition to access constraints limiting the areas of investigation, the soils analysis did not include testing for asbestos, which could present a risk. Notwithstanding, it would be common practice for any landscaped areas to be designed to limit the potential for users of the Site to come into contact with contamination and this can be controlled through standard/typical planning conditions attached to a planning permission. Therefore, the potential for a source-pathway-receptor linkage for impact on the health of end users is considered unlikely.

There is potential for effect from contaminated soils on construction workers and surrounding workers/residents. However, construction works and associated procedures would follow current best practice and legislative requirements, and as such, the potential effects of the proposed Development

on human health (in the short-term) would not be expected to be significant. A CEMP would be implemented for the duration of the works, and would include damping down to limit dust emissions and the use of PPE by construction workers to reduce the risk of direct contact and dust inhalation with the existing soils. Furthermore, additional care will be taken with works undertaken in close proximity to the canal, in order to reduce the risk of any potential impact on surface waters.

Any piling associated with the proposed Development is likely to terminate in the London Clay, although additional, deeper boreholes would be required to confirm this. As a result the redevelopment of the Site is considered unlikely to give rise to significant effects on groundwater flow or quality.

Further geotechnical and contamination investigations would be required at the design stage in order to clarify piling depth and method; determine the presence of asbestos; and classify the soils to be excavated/disposed of as hazardous or non-hazardous waste.

f. Archaeology and Heritage

The Site is not located within an Archaeological Priority Area, nor does it contain, any scheduled monuments. The nearest conservation area is the Wembley High Street Conservation Area approximately 2km north-north east of the Site. The closest designated is Grade II Listed Church of St Mary, Brentmead Gardens located approximately 1km to the south-east. The closest locally listed building is Alperton Underground Station, located approximately 85m to the north of the Site.

The potential archaeological survival from different time periods across the Site may be varied due to past developments. Although some intrusive work would be carried out as part of the scheme of demolition and construction, due to the distance of the Site from any designated areas of archaeological interest it is not considered that the proposals will have a significant environmental effect on the heritage of the Site or the surrounding area.

An Archaeological Desk-Based Assessment will be carried out and submitted alongside the planning application to examine any archaeological potential of the Site in line with the policy requirements of the National Planning Policy Framework (NPPF), the London Plan and the Local Plan.

g. Water Resources and Flood Risk

A Flood Risk Assessment (FRA), Drainage Strategy and Drainage Management Plan has been completed for the proposed Development and will be submitted alongside the Planning Application. This document found that significant effects from flooding of rivers and the sea is highly unlikely as the Site is wholly located in Flood Zone 1.

Furthermore the proposed Development is designed to address the residual risk for surface water flooding by not increasing in impermeable areas, the proposed Development will retain and utilize the existing connection to the sewers in surrounding roads (any new connections to be approved and agreed with Thames Water).

The proposed Development will incorporate new low-water demand devices such that despite potentially increasing the number of basins/toilets the increase in peak flow and volume of flow is likely to be negligible.

Given the fact that the scheme will also not increase the amount of impermeable areas on the Site it is considered likely that the Development will have no tangible impact on surrounding infrastructure if a standard drainage strategy to meet London Plan is met.

The FRA also addresses the required information in regards to SUDS and surface water runoff, to ensure compliance with LBB and National Planning Policy, as well as an assessment of the foul drainage.

h. Microclimate – Daylight, Sunlight and Overshadowing

The closest existing residential receptors to the Site would be those at the adjacent development at 243 Ealing Road, south of the Grand Union Canal. The Canal itself which borders the Site would also be

considered a sensitive receptor given its status as a Metropolitan Site of Nature Conservation Importance.

Effects in relation to daylight, sunlight and overshadowing would vary throughout the demolition and construction phase. These would however be less than the effects of the completed proposed Development and would only be temporary.

It is unlikely that the proposed Development would have a significant effect on the Metropolitan Site of Nature Conservation Importance in terms of daylight, sunlight and overshadowing as the Site is located to the north of the canal thus largely casting its shadow to the north.

The scheme has been designed with regard to its relationships with surrounding properties in both the interim and future conditions. The proposed Development is designed to avoid breaching BRE guidance wherever possible. This being the case, it is unlikely that the proposed Development would give rise to any significant daylight, sunlight or overshadowing impacts. The orientation and layout of the proposed residential units of the Development considers the requirements to achieve acceptable levels of internal daylight and sunlight levels, as far as practically possible.

A Daylight and Sunlight Assessment would be submitted alongside the planning application.

i. Microclimate – Wind

The current proposed layout includes for a single building of varying height up to 26 storeys. The proposed Development has been designed with regard to microclimate in term of massing, articulation and landscape. The suitability of the local wind environment has considered the comfort levels required for pedestrian activities that would occur in and around the Site. In particular, consideration has been given to areas of public realm space, pedestrian routes, and the design / provision of balconies to the proposed residential units.

As a result it is not anticipated that strong downdraughts or other adverse wind microclimate effects would result. The scale and massing of the proposed Development is therefore unlikely to generate any significant wind microclimate effects within or around the Site. A Wind Report will be submitted as part of the Planning Application.

j. Waste

The construction and operation of the proposed Development would inevitably generate waste. However, a CEMP would be prepared to be implemented by the contractor during the construction works. This would ensure that waste is managed in line with relevant legislation and best practise to minimise waste generation and maximise reuse and recycling.

In terms of operational waste, as part of the design process and in line with local and national requirements, the proposed Development would provide sufficient space for the storage of segregated general and recyclable waste. In addition, the servicing of the proposed Development would ensure that adequate waste collection and disposal can occur as necessary.

It is anticipated that all servicing for the food store and refuse collection for the residential element will occur on Site. It is predicted that one HGV per day will service the foodstore for supplies and also remove waste products once deliveries are completed.

In light of the above, construction and operational waste generation is not considered to give rise to significant environmental effects. Furthermore, the Development is not likely to give rise to particularly hazardous waste materials (see **e. Ground Conditions and Contamination**).

k. Socio-Economics

Construction and operation of the Development would provide some temporary and permanent local employment opportunities, as would be expected for a project of this type. This is likely to be temporary and short term and would not significantly impact on the local economy.

The food store proposed as part of the Development would result in the generation of permanent on-site jobs, and in turn, additional employee spend in the local area. However, it is anticipated that these effects would be relatively small and would therefore be unlikely to be noticeable in the context of existing levels of commercial, industrial and residential activity in the surrounding area.

The residential units proposed as part of the Development would result in a new residential population in the area. This new residential population would result in additional household spending in the local area, supporting employment in local shops, services and other amenities. Again, it is anticipated that these effects would be relatively small and would be unlikely to be noticeable in the context of existing levels of commercial, industrial and residential activity in the surrounding area.

The new residential population would also place some additional demand on community services such as primary health care and primary and secondary school places. It is anticipated however, that the population, some of which are likely to already be resident in the Borough, could be accommodated by existing services or would be dealt with by way of contributions and a legal agreement for the planning permission. As such, the above socio-economic effects would not be expected to be significant.

I. Ecology

The Site is not part of an area covered by European or National Statutory designation, such as a Special Area of Conservation (SAC) or a Site of Special Scientific Interest (SSSI). Statutory designations within 2km of the Site include Foxwood LNR and Perivale Wood LNR as well as the Grand Union Canal which borders the Site to the south which is a Metropolitan Site of Nature Conservation Importance. The Grand Union Canal, bordering the Site to the south, is a Site of Metropolitan Site of Nature Conservation Importance.

The Site been the subject to an Extended Phase 1 Habitat Survey and Daytime Bat Survey to determine whether there are any overriding ecological constraints to the Development of the Site are delivery of the Proposed Scheme.

The habitat types present within the Site consisted of hardstanding, warehouses and pockets of scattered scrub with mature and semi-mature trees, the species recorded are associated with disturbed urban areas.

The main habitat on the Site is hard standing in the form of buildings, concrete and gravel. These areas had occasional scattered patchy emergent scrub. The other main habitat type present of pockets of scattered scrub with mature and semi mature trees associated with disturbed areas.

The habitats on Site are considered to be of low ecological value and the presence of protected species considered negligible. The nature of the proposed Development, its location and the relatively small size of the Site are all factors which combine to result in unlikely significant effects upon surrounding habitats, protected species and wildlife in general.

Furthermore, recommendations of the Phase 1 Habitat Survey to enhance biodiversity, the development of the Site is likely to increase its ecological value and provide net gains to biodiversity. For example, bat boxes, nesting boxes for birds and green and brown roofs could be part of the development plans. While soft landscaping could include native and wildlife friendly plant species.

As would be identified in the Daylight, Sunlight and Overshadowing Assessment Report to be submitted as part of the planning permission (as described above), although the proposed Development borders the Grand Union Canal (a Metropolitan Site of Nature Conservation Importance), it is unlikely that the Proposed Development it will cause a significant detrimental effect to the ecologically designated site in terms of daylight, sunlight and overshadowing as the Site is to the north of the canal.

m. Cumulative Effects

It has been described above that the potential for significant effects from all environmental topics is unlikely. In addition, there are no significant proposed or committed developments in the immediately surrounding area that need to be taken into account when assessing the impacts of the proposed

Development. This has been discussed with the Case Officer. Any relevant cumulative schemes would be of sufficient distance to the Site that significant cumulative effects unlikely.

It is therefore considered that the cumulative effects with other schemes in the area would not be significant. A CEMP will be developed and implemented to ensure that any effects during the demolition and construction works will be minimised as far as practicable.