

11<sup>th</sup> February 2016

Victoria McDonagh  
London Borough of Brent  
Planning & Regeneration  
Civic Centre  
Engineers Way  
Wembley  
HA9 0FJ

Dear Victoria,

### **EIA Scoping Request Minavil House, Rosemont Road, Alperton**

AECOM has been commissioned by CML Limited (hereinafter referred to as 'the Applicant') to provide Environmental Impact Assessment (EIA) services for a Proposed Development at Rosemont Road, Alperton HA0 4PZ, known as Minavil House – see Appendix A for the indicative site boundary.

The Proposed Development is for the redevelopment of Minavil House comprising: *“Demolition of existing buildings and the construction of a mixed use building up to twenty six storeys. 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.”*

The scheme is the most prominent gateway site to the Alperton regeneration area, it is located in the core of the adopted Alperton Master plan, and lies in a strategic location for completing a significant corner of the regeneration area where a major housing led mixed-use scheme is near completion at 243 Ealing Road.

This letter sets out the proposed scope of the EIA to support the detailed planning application for the Proposed Development and seeks an EIA Scoping Opinion from the London Borough of Brent (LBB).

### **Site and Surroundings**

The Proposed Development is on a 0.48 hectare (ha) site in the LBB. We understand the Site currently comprises an electricity substation, a light industrial building containing vehicle repair workshops and associated parking.

The Proposed Development includes:

- Demolition of existing structures and construction a 26 storey building;
- Provision of 263 residential units (comprising a mix of one, two and three bedroom apartments);
- Provision of a supermarket (approx. 1,500m<sup>2</sup> GIA);
- A café/community facility and an office; and
- Communal amenity spaces and landscaping.

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 and is in proximity to the Alperton Piccadilly Line London Underground Station and the railway line to the north. The Site is not within, or immediately adjacent to, any statutory designated sites for heritage, landscape, water resources or ecology; however the Grand Union Canal is a Site of Nature Conservation Importance (SNCI) at the Metropolitan Level.

### **Application History**

In February 2010, a planning application was submitted for development of an 11 storey building comprising a retail unit (A1), office space and 55 residential units on the Site. The scheme was granted planning permission in December 2011 (application reference 10/0245). However this application was granted consent prior to the publication of the Alperton Masterplan Supplementary Planning Document (SPD) (adopted in 2011) and as a result the scheme was below the expectations for height, density and land use on the Site as set out in the SPD, and therefore this consent has not been implemented.

## **Need for Environmental Impact Assessment**

The Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended 2015) (hereafter referred to as the 'EIA Regulations') distinguish between two different categories of development that will require or potentially require EIA. These developments are divided into Schedule 1 and Schedule 2 applications under the EIA Regulations.

Development proposals that would fit the descriptions in Schedule 1 always require EIA and are largely related to large infrastructure projects or development that is generally regarded as having a high potential for pollution. The need for EIA for other types of developments (which are listed in Schedule 2) is determined on the basis of the following criteria:

1. It falls under one of the development classes within Schedule 2; AND
2. EITHER exceeds the thresholds / criteria for that class of development in Schedule 2; OR it is in a sensitive area; AND
3. It is likely to have significant effects on the environment.

Sensitive areas are defined in the EIA Regulations as Sites of Special Scientific Interest (SSSI), land to which Nature Conservation Orders apply, international conservation sites, National Parks, Areas of Outstanding Natural Beauty, World Heritage Sites and Scheduled Monuments.

Developments falling under Schedule 2 may or may not require EIA. Since the Proposed Development is an "urban development project" it falls into one of the classes stated in Schedule 2. With regard to the criteria for an "urban development project" item 10 (b) of the Schedule 2 states that an EIA may be required if:

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

Whilst the Proposed Development does not exceed the associated threshold of 5ha and is not located in a sensitive area in the context of the EIA Regulations, the Development does exceed the screening threshold of 150 residential units.

## **EIA Screening Process**

A Screening Request for the Proposed Development was issued to the LBB on 22<sup>nd</sup> December 2015 and a Screening Opinion was received from the LBB on 29<sup>th</sup> December 2015 stating that an EIA was required due to the potential for significant effects based on the height and scale of the Proposed Development and the change in scale compared to the existing uses and permissions for the Site. The Screening Opinion states the following:

*"Taking into account the scheme's scale, nature and location, the Council considers that the new development is on a significantly greater scale than the previous use and permissions for the site and due to its height it is anticipated it will result in significant environmental effects. Therefore, the Local Planning Authority considers that the forthcoming application for this site requires an Environmental Impact Assessment."*

An EIA will therefore be completed and an Environmental Statement will be submitted in support of the planning application, the scope of which is described in this Scoping Request.

## **Approach to the Environmental Statement**

To ensure the EIA is in line with planning policy, each technical chapter will include consideration of current legislation, planning policy and relevant guidelines. The chapters will include reference to, but are not restricted to, planning policies from the following:

- Department of Communities and Local Government (DCLG), (2012); National Planning Policy Framework;
- DCLG, (2014); Planning Practice Guidance;
- Greater London Authority, (2015); The London Plan: Spatial Development Strategy for London consolidated with alterations since 2011;
- London Borough of Brent, (2010); Local Plan – Core Strategy; and
- London Borough of Brent (2015); Local Plan – Development Management Policies DPD.

## **EIA Statutory Requirements and Guidance**

The ES will be prepared in accordance with legislative requirements and current guidance for EIA. In particular, the ES will be prepared with due consideration to:

- Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2011 (as amended 2015);
- Institute of Environmental Management and Assessment (IEMA) Guidelines for Environmental Impact Assessment, 2004 (amended 2006); and
- Department for Communities and Local Governance (DCLG), Planning Practice Guidance 2014.

## **Proposed Content of the Environmental Statement**

A number of supporting technical environmental reports are being prepared in support of the planning application which will be submitted as standalone reports rather than included as part of the ES and the findings of these studies have been considered in defining the scope of the ES. In addition, the guidance provided by the LBB and contained within the Screening Opinion has also been considered. The proposed assessment methodology for each of the technical chapters to be included within the EIA has been provided below as well as the justification for scoping out the remaining topics.

Taking into consideration the likely significant environmental effects associated with the Proposed Development, the following structure of the ES is proposed:

- Chapter 1: Introduction;
- Chapter 2: EIA Methodology;
- Chapter 3: Alternatives and Design Evolution;
- Chapter 4: The Proposed Development;
- Chapter 5: Demolition and Construction;
- Chapter 6: Daylight, Sunlight and Overshadowing;
- Chapter 7: Wind Microclimate;
- Chapter 8: Townscape and Visual;
- Chapter 9: Effect Interactions;
- Chapter 10: Residual Impacts and Conclusions; and
- Non-Technical Summary.

Detailed baseline information, supporting data and assessment results will be included in Volume II of the ES Technical Appendices.

Each technical ES chapter (chapters 6 – 8) will:

- Define baseline conditions and consult with relevant stakeholders to identify key concerns and obtain data;
- Identify the likely impacts associated with the development and determine their magnitude;
- Assess the likely significant effects of the Proposed Development during demolition, construction and operation;
- Identify any required mitigation measures and evaluate any uncertainties associated with mitigation;
- Evaluate residual effects or risks; and
- Assess the likely cumulative effects arising from the Proposed Development in combination with other developments nearby.

### *Effect Interactions*

Effect interactions will be assessed qualitatively in a separate chapter (see below for further details) if applicable. These relate to the combined effect of individual effects from different topics on one location or receptor arising as a result of the Proposed Development.

A review of the residual effects presented within the ES will be undertaken, along with an exercise which tabulates the effects against receptors in order to identify the potential for effect interactions and so combined effects. Only residual effects classified as being of minor, moderate, major

significance will be considered in relation to the potential for the combined effects of individual effects. Residual effects of negligible significance will be excluded from the assessment of the combined effects of individual effects as, by virtue of their definition they are considered to be imperceptible effects to an environmental resource or receptor.

Where there is more than one effect on a particular receptor, the potential for effect interactions will be determined. If there is the potential for effect interactions then consideration will be given to whether there is the potential for any resultant combined effects.

### *Cumulative Effects*

Cumulative effects occur as a consequence of interactions between the effects of a number of projects in the same geographical area. The review of the combined effects of the Proposed Development with other schemes will be presented within the technical chapters.

The EIA will consider other schemes located within 1km from the Site. The 1km distance has been applied to ensure all schemes with the potential to interact in a cumulative manner within the vicinity of the Site are taken into account. The schemes considered as part of the cumulative assessment will comprise consented schemes, those with a resolution to grant consent and schemes under construction. Those schemes which have been granted permission, with an application submitted to extend the time limit for the implementation of planning permission will also be considered. Some schemes which do not have consent may be considered within relevant topics of the ES where appropriate.

In order to be considered as being significant, the schemes identified provide over 10,000m<sup>2</sup> of gross external area (GEA) floorspace.

The schemes to be considered within the cumulative effects assessment is provided below and it is requested as part of the Scoping Opinion that LBB confirm this list of schemes:

- **2 Atlip Road HA0 4LU (Reference 15/2061):** A planning application was submitted on 26th May 2015 for the 'Proposed demolition of existing former retail warehouse building and erection of 'car free' development comprising a part 3 storey to part 10 storey building of 99 residential units (4 x studio, 31 x one-bedroom, 51 x two-bedroom and 13 x three-bedroom units) with associated cycle parking, x13 no. disabled only parking spaces at basement level with, x2 car club only spaces and new vehicle accesses off Atlip Road and associated landscaping' at 2 Atlip Road HA0 4LU. The application has not yet been determined. Although, this is unlikely to be 10,000 sqm as the minimum housing standards would place the internal floorspace at 5,430 sqm;
- **255 Ealing Road (Reference 14/2276):** Construction of 3- to 9-storey building comprising 125 residential units and 277 sqms of affordable workspace (Use Class B1) and/or community floorspace (Use Class D1) and associated parking, access, landscaping and related ancillary works, subject to a Deed of Agreement dated 10 December 2014 under Section 106 of the Town and Country Planning Act 1990, as amended;
- **1C Carlyon Road (Reference 15/3950):** Demolition of former print workshop and redevelopment to provide one 4 storey block with 8 residential units (1 x 1bed and 7 x 2bed) and one six storey block with 19 residential units (4 x 1bed, 12 x 2bed and 3 x 3bed) with associated vehicular crossover, car and cycle parking spaces, bin stores, amenity space and landscaping. Due to be determined at the end of February 2016; and
- **Alperton House Bridgewater Road, Alperton, HA0:** Whilst there is no planning application currently for this site, it is listed within the London Borough of Brent's Site Specific Allocations document for redevelopment including up to 120 residential units, food and drink areas and office space. Whilst this cannot be considered quantitatively within the cumulative effects assessment the principle of development on this allocated site will be referenced.

## Topics Scoped into the ES

### *Daylight, Sunlight and Overshadowing*

The ES will include an assessment of impacts upon daylight, sunlight and overshadowing to surrounding buildings and amenity areas that may be caused by the Proposed Development. The assessment is undertaken in accordance with "BRE 209 Digest: Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice". In response to the location and scale of the Proposed Development, potential impacts on daylight, sunlight and overshadowing will include the following assessments:

- Daylight: The BRE guidelines "Site layout planning for daylight and sunlight" incorporate two main methods of calculating daylight: the Vertical Sky Component (VSC) method and the Average Daylight Factor (ADF) method;
- Sunlight: Potential impacts on available sunlight are assessed using the BRE's Annual Probable Sunlight Hours (APSH) method. This method involves the forecasting of sunlight availability throughout the year and in the winter months, for the main window of each habitable room that faces within 90° of due south. The buildings surrounding the site that do not contain windows that face within 90° of due south has been excluded from the sunlight assessment; and
- Overshadowing: for this assessment at least half of a garden or amenity area should receive at least two hours of sunlight on 21<sup>st</sup> March. If as a result of new development, an existing garden or amenity area does not meet these guidelines, and the area which can receive two hours of sun on 21<sup>st</sup> March is less than 0.8 times its former value, then the loss of sunlight is likely to be noticeable.

Given that the full daylight, sunlight and overshadowing effects of the Proposed Development will only occur once the Proposed Development is completed, an assessment during the demolition and construction phase is not necessary as the potential worst case effects will be considered in the operational phase assessment.

Any cumulative developments will also be considered if applicable to the Proposed Development and in line with the BRE guidelines as listed above. An assessment will be undertaken to determine the extent of the Proposed Development on existing residential receptors and amenity areas, with the cumulative schemes considered as built and thus evaluating the additional extra over impact of the Proposed Development beyond the consented schemes. In addition, residential cumulative schemes located in close proximity to the site will also be considered as sensitive receptors in regards to daylight and sunlight.

### *Wind Microclimate*

The ES will include a Wind (Microclimate) Chapter, which will quantify the potential changes to the local wind environment (both on-Site and within the surrounding area) in terms of pedestrian amenity and public open space and quantify these in relation to their 'usability' for a range of pedestrian activities defined by the Lawson Comfort Criteria. Scale models (1:300) will be built for the following scenarios:

1. The buildings currently occupying the Site and the existing surrounding buildings / area (the baseline);
2. The complete Proposed Development massing occupying the Site and the existing surrounding buildings / area; and
3. The Proposed Development's massing occupying the Site, and the surrounding buildings / area including the massing of nearby cumulative schemes.

The models will be manufactured and tested in a boundary layer wind tunnel test facility. Mean and peak wind speeds will be measured around the base of the buildings forming the Proposed Development and other surrounding buildings, paths, roads, and areas of open spaces, for all wind directions. These results will be combined with long-term meteorological climate data for the London area.

The results of this analysis will be benchmarked against the well-established Lawson Comfort Criteria to determine the suitability of the different areas both within and surrounding the Site for sitting, standing, entering a building, leisure walking, business walking or crossing the road. The suitability of the conditions both within the Site and surrounding the Site will be presented and discussed within the ES. Should mitigation measures be required to ensure that wind conditions are suitable for their

intended use, the areas requiring mitigation will be identified and mitigation measures will be developed.

The potential for strong winds to occur will also be quantified. Through the determination of the suitability for use of the areas surrounding the Site (for scenarios 2-3 identified above), a direct comparison can then be made with the baseline / existing off-site conditions, and the effect to these surrounding areas assessed, with the significance of effects identified.

Selected roof terraces will be also tested within the wind tunnel in order to determine the suitability of these areas for future residents. Although the assessment of these spaces will be completed for all seasons, the focus will be on the wind microclimate during the summer when these areas are more likely to be frequently used.

### *Townscape and Visual*

The ES will include an assessment of the Proposed Development in relation to its wider setting by considering changes to a number of selected views and to the townscape character of the area. This will be undertaken for the demolition and construction phase, for the Proposed Development once completed and operational and in combination with any cumulative developments if applicable. The views assessment will take into account the proposed building height when assessing the potential impact of the building on the townscape. A final set of viewpoints to be assessed will be agreed in advance with the local planning authority

Effects will be assessed in terms of the magnitude of the impact or change and also the sensitivity of the townscape resource or visual receptor affected. The adopted method of Townscape and Visual Impact Assessment (TVIA) has been devised to address the specific impacts likely to result from a development of the scale, nature and location of the Proposed Development. The methodology draws upon the following established best practice guidance:

- Landscape Institute and Institute of Environmental Management and Assessment, (2013), Guidelines for Landscape and Visual Impact Assessment, Third Edition.

Desk-based studies will be undertaken to review planning policy relevant to townscape and views, including strategic and locally important views. Detailed townscape and visual studies will be carried out in consideration of the following:

- Townscape character, including Site context, topography, buildings and pattern of built form, vegetation and open spaces, roads and pedestrian routes; and
- Visual receptor groups identified for the purposes of assessing the likely impact of the Proposed Development on visual amenity with reference to a series of representative views.

### Townscape Impact Assessment Methodology

The townscape assessment will address the impacts of the Proposed Development on townscape resources and character, including the setting and character of historic assets if visible. The assessment of townscape impacts will be structured around the identification of townscape character areas (TCAs). Within the study area, either direct impacts will result from development on the Site itself, or indirect impacts will result where there is a degree of inter-visibility between the Site and the surrounding townscape, or where no change would be perceptible. Any significant effects will be identified taking into account the sensitivity of the townscape and the magnitude of impact as a result of the Proposed Development.

### Visual Impact Assessment Methodology

The visual assessment will place the Proposed Development in the context of the surrounding environment. It will consider potential impacts during the daytime only, since this is a relatively densely developed urban environment which contains a number of tall residential buildings. The additional lighting that would be brought about by the Proposed Development would be incremental only. Impacts associated with additional night-time lighting on the townscape would therefore be scoped out of the assessment.

Representative viewpoints will be selected to cover a range of receptor groups and locations from close, middle and long distance which will be agreed with LBB to adequately illustrate the visual impact of the Proposed Development and will be presented within the ES as Verified computer generated images (CGIs). Five close range viewpoints have already been identified for assessment

by the local planning authority and the townscape assessors, and additional middle and long distance viewpoints are currently being considered for inclusion within the assessment. Appendix B outlines the proposed viewpoint locations. Photography for the CGIs and visual assessment will be taken during the winter months when there is no leaf cover on deciduous vegetation, representing 'worst case' baseline visual conditions. Additionally the assessment will consider the impact of views on Wembley Stadium in line with the requirements of the Wembley Area Action Plan (2015).

Whilst there is a degree of professional judgement involved in determining the significance of townscape and visual effects, these effects are broadly determined by the interaction of the sensitivity of receptor and the magnitude of change, to enable a degree of effect to be categorised which will be presented in the ES. Should significant adverse effects be identified, appropriate mitigation measures will be recommended in order to reduce the residual effects to non-significant where possible.

## **Topics to be Scoped out of the ES**

### *Socio-economics*

The construction of the Proposed Development will provide employment, both to the demolition and construction workers directly and indirectly through the supply chain although this is unlikely to be significant in the context of the local economy.

During the operational phase of the Proposed Development, employment will be generated as a result of the new foodstore and retail unit as well as due to management of the residential units. In turn the Proposed Development will also contribute to additional local spending from the increase in residents to the area. However this is unlikely to be significant in relation to the local economy.

The Proposed Development will make a positive contribution to the LBB's Housing targets. The design of the Proposed Development also provides private balconies for all units as well as communal amenity spaces. Whilst the new residential population within the Proposed Development will require access to community services such as primary healthcare and primary and secondary school places, it is anticipated this could be accommodated by existing services which will be supported and enhanced by planning obligations.

It is therefore considered that this scheme will largely contribute positively to the local area and will be scoped out of the ES.

### *Traffic and Transport*

A Transport Assessment (TA) and other supporting documents (including Residential and Staff Travel Plans, draft Construction Traffic Management Plan and Service and Delivery Plan) will be submitted in support of the planning application and will provide a comprehensive assessment of the potential effects of the Proposed Development on the local highway network, the public transport infrastructure, cyclists and on pedestrians both during construction and once the scheme is operational.

There are currently approximately 28 car parking spaces on-site. Given the nature of the land uses at the existing Site, the existing/former land uses are likely to generate, and have generated, a number of vehicular trips throughout the day, which access the Site via Rosemont Road. Manual Classified Counts (MCC) traffic survey data collected in November/December 2015 demonstrates that a total of 75 two-way vehicle trips are made on Rosemont Road during the AM peak and 65 during the PM peak. A number of these trips will be associated with the existing site use. The former and permitted use of the site (now largely derelict/ with the exception of vehicle repair businesses) would have generated trips.

The current Proposed Development will provide 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. Vehicular access for the proposed foodstore will be provided via Rosemont Road, as per the existing vehicular access arrangements for the Site.

Initial analysis has indicated that the car-free nature of the Proposed Development means that 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 small percentage of vehicular traffic associated with foodstore 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 Proposed Development from current destinations and passing by trips. 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 associated with the existing and permitted use of Site.

The change in land use from the existing site to the Proposed Development is predicted to represent a limited increase in the anticipated number of vehicle movements to and from the Site. Due to the limited numbers and the nature of the increase these will not have a significant adverse effect on the existing highway network in terms of its operation, capacity or safety. As a worst case assessment (excluding any allowance for the existing and permitted use of the site) the maximum increase in traffic movements during the AM and PM peak periods will be less than 4%.

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 as well as six high frequency (every 15 minutes or less) bus routes within walking distance of the site. The Site has a public transport accessibility level (PTAL) rating of 5 which demonstrates a 'very good' level of public transport accessibility.

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 high percentage of car trips associated with the food store anticipated to be pass-by and diverted trips which are already present on the highway network. By matter of comparison, survey data of a Lidl food store at Stonefield Way Ruislip suggests that over half of the trips to the store will be made by public transport, foot or bicycle. Given the location of the Site and its proximity to a large residential catchment, there is considered to be potential for these sustainable transport 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 the Proposed Development would have a significant effect on public transport capacity.

Consideration of the most congested time of the day on public transport services has identified a negligible effect as a result of the Proposed Development and it has been demonstrated that the existing services can adequately accommodate the slight increase in demand from the new residents.

Servicing of the foodstore and café and refuse collections for the residential and office elements of the Proposed Development will be accommodated within the Site boundary. The foodstore is anticipated to receive one/two HGV delivery per day (one arrival and one departure) carrying the required stock for the foodstore 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.

Pedestrian access to the Site will be enhanced through improvements proposed to the Ealing Road/Bridgewater Road junction and the Ealing Road/Rosemont Road junction, with increases in the width of the footway adjacent to the Site on Ealing Road via the dedication of land to public highway.

The demolition and construction period may 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 practice construction traffic management. This could be achieved via the implementation of a pre-agreed Traffic Management Plan which would form part of a CEMP.

Overall, it is concluded that the Proposed Development is unlikely to have an adverse impact on the performance of the local highway network and accords with national and local planning policies. The associated Travel Plan and Servicing Plan submitted with the TA will demonstrate that the proposed operational travel strategy and servicing strategy are in line with LBB policies.

Given the above, it is not considered necessary to include a Traffic and Transportation Chapter within the ES and this has therefore been scoped out. The Screening Opinion provided by the LBB also stated that:

*"The council does not consider that the development will result in significant impacts on highway capacity to warrant an EIA related to this issue. The council accepts that the development will lead to some traffic and air pollution within the vicinity of the development but that the impact is not significant when taking into account the existing situation should the existing building be occupied."*

### *Noise and Vibration*

A Noise and Vibration Assessment is being undertaken for the Proposed Development and will be submitted in support of the planning application. The scope of this assessment is to evaluate the potential adverse impacts on health and quality of life of current and prospective residents, according to the National Planning Policy Framework and Noise Policy Statement for England. A comprehensive assessment will be reported using baseline data monitored on the Site, once the scheme is fully operational.

The closest existing sensitive receptors to the Site are the residents at 243 Ealing Road approximately 25m to the south of the Site on the opposite side of the Grand Union Canal. The Site is also subject to existing background noise from the A4005 (Ealing Road/ Bridgewater Road) adjacent to the west of the Site.

As described in the traffic and transport section above, the expected increase in vehicles arising from the Proposed Development is likely to be negligible in relation to the existing number of vehicles on the surrounding roads. This applies to vehicle movements from both the residential development and from the parking at the foodstore. Therefore the potential effect on the existing noise level due to the limited increase in vehicles is also likely to be negligible.

The land use has changed from light industrial to mixed-used residential led. The Proposed Development is expected to have specific types of plant to be used and located on the lower floors, therefore away from external sensitive receptors. The additional contribution of these noise sources to the existing noise levels will be evaluated following BS 4142:2014. According to the NPPF and NPSE, the potential adverse impact on health from industrial noise sources is not likely to be significant.

The external noise levels have been calculated and predicted at the most sensitive receptors locations, following BS 7445-1:2003 and ISO 9613-2:1996. In order to meet the internal comfort criteria set in BS 8233:2014, recommendations about sound insulation of the building elements have been included following the specifications as for Building Regulations ADE.

In relation to the potential for significant effects due to vibration levels, a review of the surrounding area has not identified any major sources of vibration other than the London Underground line which sits adjacent to the north. A vibration assessment has been completed in accordance with BS6472: 2008 and has returned a sufficiently low probability of adverse impact in terms of Vibration Dose Value.

Noise and vibration levels are expected to rise during the demolition and construction phases and have been predicted according to BS 5228:2009. Mitigation measures will be implemented to reduce significant adverse impacts on existing buildings, also following the guidance given by DoE leaflet 72. This would be incorporated into a Construction Environmental Management Plan (CEMP) to be agreed with LBB prior to the commencement of construction.

Overall the Proposed Development during both the demolition and construction and operational phase, is unlikely to generate any significant effects in relation to noise and vibration levels and therefore this topic has been scoped out of the ES. The Screening Opinion provided by the LBB states that *"It is anticipated the proposal will result in an increase in noise levels during construction. However, the noise levels are not considered to be significant enough to warrant an EIA in respect of this issue."*

### *Air Quality*

An Air Quality Assessment and Air Quality Neutral Assessment are being prepared and will be submitted in support of the planning application. These documents will provide a comprehensive assessment of the potential effects of the Proposed Development on air quality and pollution levels in the local area, during the demolition, construction and operational phases of the scheme.

The Site is within an Air Quality Management Area declared for exceedances of nitrogen dioxide (NO<sub>2</sub>) and fine particulate matter (PM<sub>10</sub>).

As described above, the Proposed Development will result in a negligible increase in traffic, therefore the air quality effects on sensitive receptors in the vicinity is also likely to be negligible.

Emissions from local traffic and the proposed Combined Heat and Power (CHP) plant and boilers,

part of an on-site energy centre, will be modelled to assess potential impacts and the potential exposure of future residents to elevated pollution levels. If required, mitigation measures will be proposed to minimise the impact on Air Quality. Additionally, if pollution levels are shown to be higher than the relevant Air Quality Objectives at locations of proposed residential land use, appropriate ventilation systems will be specified to ensure a supply of clean air for all future occupants.

An additional risk associated with the Proposed Development is through potential nuisance effects associated with construction dust to neighbouring commercial building occupiers, residents and workers on site. However these effects would be temporary and would be managed through construction best practices and appropriate mitigation measures as necessary and would be detailed within the CEMP (to be prepared and agreed with LBB in advance of construction). Assuming that these measures are implemented the residual effects of this phase of the Proposed Development are considered to be not significant. The effects of the operation of the development are also likely to be considered not significant following the identification of suitable mitigation, if required.

Overall, the Proposed Development is not likely to generate any significant effects and is considered to be air quality neutral and therefore scoping out of this chapter from the ES is justified. This is supported by the Screening Opinion provided by the LBB which states that *“The development is not likely to release significant pollutants or hazardous, toxic or noxious substances into the air and the proposed use is not predicted to have a significant effect upon air quality or traffic generation in the area which would require an EIA related to this issue.”*

#### *Ground Conditions*

A Phase 1 Geo-environmental Assessment (including a review of a historical intrusive investigation for the Site) has been prepared to support the planning application, which provides a comprehensive assessment of the ground conditions on the Site, and outlines appropriate mitigation measures for both demolition and construction and operational phases of the Proposed Development.

Contamination was identified as the most significant potential risk for the Proposed Development. The report found elevated levels of hydrocarbon (Total Petroleum Hydrocarbons (TPH), Polycyclic Aromatic Hydrocarbons (PAH)), mercury and cyanide in soils as well as heavy metals found within groundwater. However given the low permeability “Unproductive Strata” below the Site together with plans for the Site to be covered in hardstanding and assumed health and safety controls during construction, this is unlikely to generate any significant effects. The ground gas monitoring undertaken to date has indicated that no special gas measures are required as part of the scheme design. Further intrusive investigation will be undertaken and a typical planning condition relating to this is anticipated.

There is potential for effects from contaminated soils on construction workers, surrounding workers/residents and the Grand Union Canal, however construction works and associated procedures associated with the Proposed Development would follow current best practice and legislative requirements and relevant mitigation measures would be included within a CEMP so effects are not anticipated to be significant.

On the basis that some elevated levels of contamination have been found, appropriate mitigation measures will be proposed and included within the CEMP in advance of construction.

Based on the information provided above it is not considered necessary to include a ground conditions chapter in the ES and this topic has therefore been scoped out. The Screening Opinion provided by the LBB supports this, stating that *“It is considered that there is slight risk of contamination at the site but on the basis of experience with other application sites it is not considered to be large enough, complex or unusual enough to require an EIA related to this issue.”*

#### *Water Resources and Flood Risk*

The Site is situated in Flood Zone 1 (low risk of flooding), and is below the 1 ha threshold for undertaking a Flood Risk Assessment (FRA) as set out in the NPPF. Additionally, the Site is not within a groundwater Source Protection Zone, nor is it underlain by an aquifer. The Site is adjacent to the Grand Union Canal although this poses a low risk for flooding. The Proposed Development will also not increase the impermeable surface area over the Site.

However a FRA (in line with the NPPF), Drainage Strategy and Drainage Management Plan will be submitted in support of the planning application and will also address sustainable drainage (SuDS) measures in line with planning policy.

An increase in water demand and use will occur as a result of the Proposed Development however it is the responsibility of Thames Water Utilities Ltd (TWUL) to meet this demand in accordance with their statutory obligations. It is proposed that the existing sewer connections will be utilised where feasible.

Any mitigation measures implemented during the demolition and construction phase will be incorporated into the CEMP as necessary, but no significant likely effects on water resources have been identified. This chapter will therefore be scoped out of the ES.

#### *Archaeology and Built Heritage*

The Site is not located within an Archaeological Priority Area, nor does it contain, any designated assets such as Scheduled Monuments or Listed Buildings. There are no Conservation Areas in the vicinity of the Site, the nearest being the Wembley High Street Conservation Area approximately 2km north-north east of the Site. The closest designated built heritage asset is the Grade II Listed Church of St Mary in Brentmead Gardens located approximately 1km to the south-east. Alperton Underground Station is the closest locally listed building located approximately 85m to the north of the Site.

Given the low archaeological potential and following consultation with the Greater London Archaeological Advisory Service (GLAAS) in December 2015, the consideration of below ground archaeology was scoped out of the heritage desk based assessment which has been prepared in support of the planning application.

The Proposed Development is likely to have a negligible effect on the Grade II listed Church of St Mary given its distance from the Site. There is no intervisibility between the main facade of Alperton Underground Station and the Proposed Development and therefore effects to this locally listed building are also likely to be negligible.

Given the above, it was considered unnecessary to include a Heritage chapter in the ES, and therefore this has been scoped out. This is supported by the Screening Opinion provided by the LBB which states that *“Overall, the scale and height of the proposed buildings means it is unlikely to have significant impact on the setting of features of historic or cultural importance and warrant an EIA in respect of this issue.”*

#### *Ecology*

A review of the Site has not identified any European or Nationally statutorily designated sites such as a Special Area of Conservation (SAC) or a Site of Special Scientific Interest (SSSI); however there are two Local Nature Reserves (LNR) within 2km of the Site (Foxwood approximately 1.4km away and Perivale Wood approximately 1.8km away). The Grand Union Canal directly to the south is a Metropolitan Site of Nature Conservation Importance (SNCI).

An Extended Phase 1 Habitat Survey and a Daytime Bat Survey have been undertaken and will be submitted in support of the planning application. The habitat survey identified that the Site comprises hardstanding, warehouses, and pockets of scattered scrub with mature and semi-mature trees. Habitats on the Site are considered to be of low ecological value and no protected species are likely to be present within the Site. The nature of the Proposed Development, its location and the relatively small size of the Site and its low ecological value combine to result in no adverse impacts upon surrounding habitats, protected species and biodiversity within the Site.

During demolition and construction, mitigation measures will be in place to ensure that no materials or debris enter the adjacent Grand Union Canal SNCI.

There is the potential for an increase in biodiversity at the Site following the inclusion of the proposed amenity areas and any ecological enhancements that may be included within the scheme design.

Based on the information stated above, ecology is to be scoped out from the ES. This is supported by the Screening Opinion from the LBB, which states the following in relation to ecology *“I am of the view that the proposed development would not cause any significant adverse impacts.”*

#### *Electronic Interference*

The introduction of new structures of significant height and bulk into an area can cause disruption to both terrestrial and satellite TV reception. The Proposed Development will receive TV reception from the Crystal Palace transmitter, which is located approximately 20km to the south-east of the Site. Once the Proposed Development is complete, both the predicted terrestrial TV shadow from the

Crystal Palace transmitter and the anticipated satellite TV shadow will lie to the north-west of the Proposed Development. Therefore it is likely that both the terrestrial and satellite TV shadow cast by the Proposed Development will lie over residential dwellings.

Should a residential dwelling suffer a loss, or deterioration of TV signal, suitable mitigation measures include re-siting satellite dishes or terrestrial TV aerials on a part of the property that is not affected, or increasing the height of the receiver. However, should there be any residential dwellings within the predicted shadow that cannot accommodate these measures, upgrading the existing terrestrial aerials or supplying a non-subscription satellite TV service such as 'Freesat' can be implemented in order to compensate for lost terrestrial TV signal. A 'hot-line' could be set up to be advertised around the hoardings of the Proposed Development during its construction phase, in order to allow for any complaints from the general public relating to the loss or deterioration of terrestrial or satellite TV reception to be investigated.

Given the ready availability of mitigation measures, such as Freesat, it is concluded that any potential effects resulting from the Proposed Development can be adequately managed once the construction of the Proposed Development is complete. Therefore electronic interference will be scoped out from the ES.

#### *Waste and Recycling*

Following an initial review of available information it is unlikely that the Proposed Development will result in any significant residual effects in regards to waste arisings and waste management. It is therefore advised that a chapter for waste will be excluded (scoped out) from the ES. However waste and recycling information will be included within a standalone Operational Waste Management Strategy which will be submitted in support of the planning application.

The Operational Waste Management Strategy will focus on the operational phase of the Proposed Development and detail the measures embedded into the design of the development for the management of waste and recycling materials.

A summary of the Operational Waste Management Strategy will be provided in Chapter 4 Description of the Proposed Development of the ES. Details of the demolition and construction waste will be included in Chapter 5 Demolition and Construction of the ES.

#### *Summary*

This letter requests a Scoping Opinion pursuant to Regulation 13 of the Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2011 (as amended 2015). The LBB and consultees are invited to consider the contents of this letter and comment accordingly within the five-week period prescribed by the EIA Regulations.

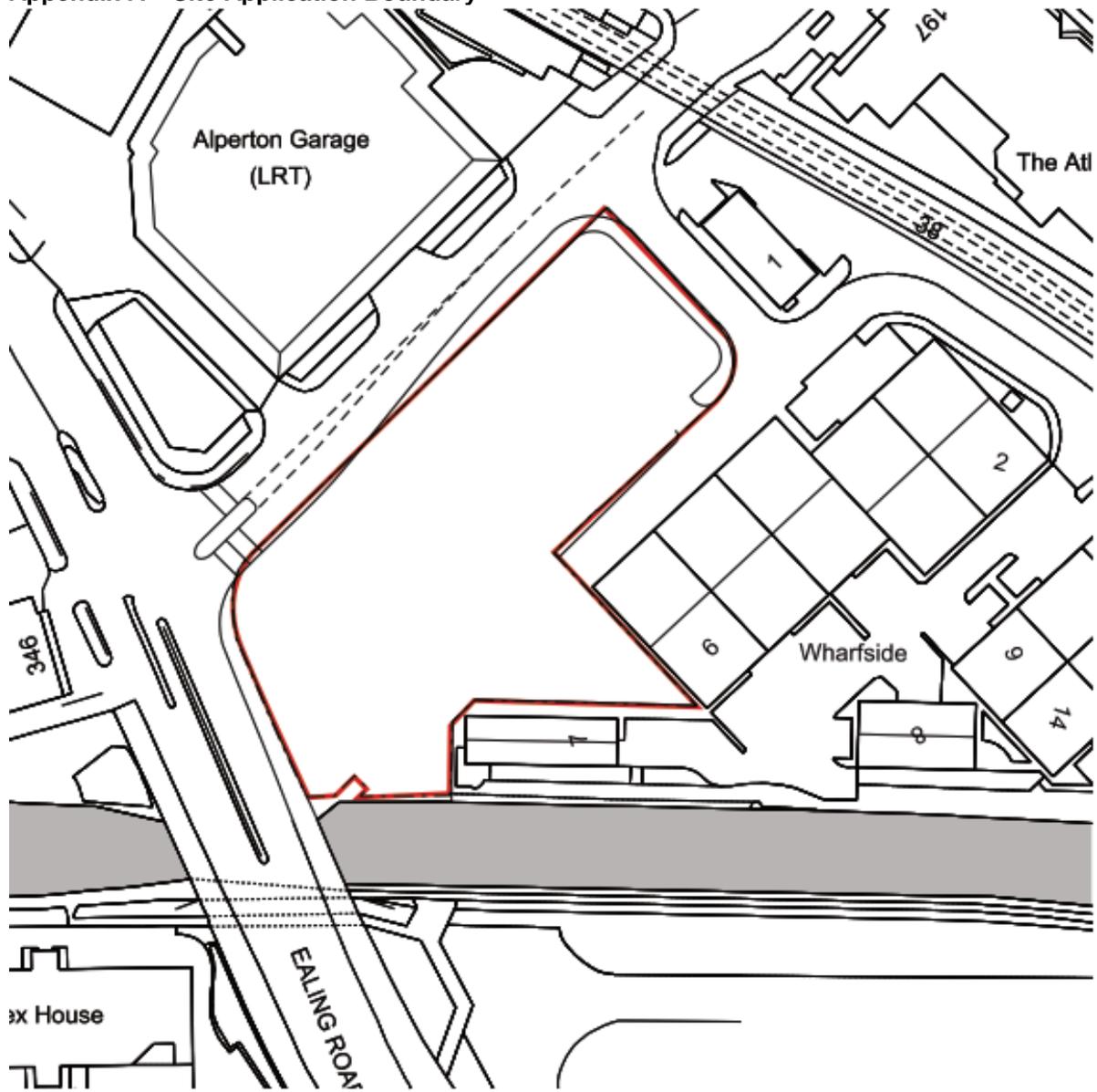
In the meantime, please do not hesitate to contact me should you have any queries or require any further information.



Yours sincerely,  
Sheenagh Mann

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Appendix A – Site Application Boundary



LOCATION PLAN  
1:1250 in A4



## Appendix B – Viewpoints agreed with the London Borough of Brent

Assessment Viewpoint Locations- as agreed with LBB

The selected five close range views were identified for assessment by the local planning authority:

- **View 1.** *Bridgewater Road - looking southeast towards the site*
- **View 2.** *Underneath Railway bridge at Alperton Station - looking south towards the site*
- **View 3.** *Rosemont Road - looking southwest towards the site*
- **View 4.** *Grand Union Canal towpath adjacent to 243 Ealing Road - looking northwest towards the site*
- **View 5.** *Ealing Road - looking north towards the site*

Fig. 1: Viewpoint Origins (N.T.S)

