

Sheenagh Mann
AECOM
6-8 Greencoat Place
London
SW1P 1PL

BY EMAIL

16th March 2016

Dear Ms Mann

Re: Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 and Amendment Regulations 2015: EIA Scoping Opinion Request for the redevelopment of Minavil House, Rosemont Road, Alperton HA0 4PZ

I write further to your letter and proposed scope of the Environmental Assessment, dated 11th February 2016 relating to the above proposal. The following is the Council's formal 'scoping opinion' under Regulation 13 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations, 2011.

The proposed development is for the redevelopment of Minavil House described as: *'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.'*

Daylight, sunlight, overshadowing, and wind microclimate

- The methodologies identified for assessing potential impacts on daylight, sunlight, overshadowing and wind microclimate are appropriate. These studies will need to inform the scale and layout of the development, and therefore must be undertaken from the outset.
- The Canal & Rivers Trust commented the development should specifically consider the impact of the proposal on overshadowing of the canal, and the associated impact on ecology and amenity of the canal environment. Development should contribute towards the enhancement of the canal environment and towpath, which will experience increased demand as a result of the proposal.

Noise and Vibration

- The noise assessment should have particular regard to the Locally Significant Industrial Sites to the north and east of Minavil House. These sites are protected for industrial employment uses, which have potential to generate significant noise.
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Air Quality

- The site falls within Brent's Air Quality Management Area. 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. However, in accordance with London Plan policy 7.14 it must be demonstrate, through an Air Quality Impact Assessment prepared by a suitably qualified person, the development will be at least air quality neutral.

Contamination

- It is noted a Phase 1 Geo-environmental Assessment has been prepared and will outline appropriate mitigation measures for both demolition and construction and operational phases of the proposed development. Further site investigations and a risk assessment must be undertaken by competent persons in accordance with the appropriate British Standards and guidance. After remediation land must be suitable for use, and as a minimum, should not be classified as contaminated under Part IIA of the Environmental Protection Act 1990. All remediation will require in-situ verification reporting to demonstrate that the required standards have been achieved.

Water Resources and Floodrisk

- This area falls within the Critical Drainage Area (CDA) as highlighted in our Surface Water Management Plan (SWMP). This area has a history of flooding and surface water sewer is known to surcharge during heavy rain. Flow from the site will need to be drastically reduced to prevent flooding in the catchment.
- It is appropriate that the application is accompanied by, as stated in the scoping report, "a FRA (in line with the NPPF), Drainage Strategy and Drainage Management Plan" which also addresses sustainable drainage.

Sustainability, Energy & Climate Change

- Climate change and its potential impacts are not covered in the scoping report. Whilst this can be covered in a separate, stand alone, Sustainability Statement, it should be noted that climate change and its potential impacts and adaptation measures should be considered as an overarching theme and its effect on the identified significant environmental impacts should form part of the assessments.
- The Council will be seeking a comprehensive approach to tackling climate change. The Council would expect Excellent BREEAM rating on the commercial element of the scheme. The Council, in accordance with the London Plan, will require consideration to Lean, Clean and Green measures and a reduction in carbon dioxide emissions of 40% on the Part L 2010 or 35% on Part L 2013 Building Regulations, 20% of which should be through the use of on-site renewable energy generation where feasible.

Ecology and Nature Conservation

- Natural England has provided general guidance on information to be included Environmental Statements, which will be forwarded separately for information.

- Whilst the development of this site is not likely to have significant ecological impacts which would require an EIA, in accordance with the NPPF and London Plan policy 7.19 the development should seek to make a positive contribution to the creation and management of biodiversity. In addition the development should seek to contribute to the tree planting target for Alperton in the Core Strategy. This can be captured in the accompanying Planning Statement and associated landscaping plans.

Waste and Recycling

- Whilst no significant impacts have been identified in relation to waste and recycling, development should accord with the council's Waste Planning Guide, to ensure effective storage and collection of recyclable and non-recyclable waste at design stage.

General

The Environment Agency indicated they consider the proposal to be low risk in respect of the environmental constraints that fall under their remit.

I trust that the above will be of use to you. Should you wish to discuss any of the above comments please do not hesitate to contact me.

Date of Decision: 16th March 2016

On behalf of the Council of the London Borough of Brent



Paul Lewin
Planning Policy & Projects Manager
Planning and Regeneration
Brent Council