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Rebekah Jubb  
Bell Cornwell

**By e-mail**

14<sup>th</sup> March 2018

Dear Rebekah Jubb,

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

**Proposal:** Request for Screening Opinion as to whether an Environmental Impact Assessment is required for a proposed development of a mixed-use development of up to 700 residential dwellings, in the form of 1, 2 and 3-bedroom flats and 3-bedroom houses

**Site:** Land at Alperton Manufacturing Estate, Alperton, Wembley, HA0 1NR

I write in connection to your screening request submitted on 21<sup>st</sup> February 2018. Reference has been made to Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ("the EIA Regulations") "Requests for screening opinions of the relevant planning authority".

Upon review of the material supplied in association with the screening request from the applicant, plus other material that is mentioned in association with this screening opinion, the London Borough of Brent considers that the proposed development is not EIA development. As such it will not require an EIA to be undertaken to accompany any planning application for development described that incorporates the proposed mitigation measures to address potential adverse effects of the development as set out in this screening opinion.

As required by Regulation 6(6) of the EIA Regulations please find attached the Council's Statement of Reasons which provides full reasons for this conclusion.

If you require any further assistance, please do not hesitate to contact Paul Lewin, on telephone 020 7937 6710 or email [paul.lewin@brent.gov.uk](mailto:paul.lewin@brent.gov.uk).

Yours sincerely,

**Paul Lewin**  
**Team Leader Planning Policy**

**EIA SCREENING OPINION STATEMENT OF REASONS**  
**The Town and Country Planning (Environmental Impact Assessment) Regulations**  
**2017**

**Description of proposed development** – Request for Screening Opinion as to whether an EIA is required in respect of an application for a proposed development of a mixed-use development for up to 700 residential dwellings, in the form of 1, 2 and 3-bedroom flats and 3-bedroom houses ranging from 3 to 14 storeys in height.

**Site** – Alperton Manufacturing Estate, Alperton, Wembley, HA0 1NR

*Notes - The assessment of the proposed development's likely significant effects is in relation to the EIA Regulations only. The assessment does not imply any consideration of the planning merits of the proposals or indicate the likely success or otherwise of an application for planning permission.*

### **Introduction**

Rebekah Jubb of Bell Cornwell requested a screening opinion from London Borough of Brent (the Council) on 21st February 2018. Associated with this request details of the site boundary, proposed development and an initial assessment of the potential impacts of the proposed development taking account of associated submitted technical studies were submitted to support the request.

### **The Existing Site and Surrounding Area**

The development site fronts onto the Grand Union Canal and Mount Pleasant and is roughly rectangular in shape. The site is approximately 700m east of Alperton Underground Station which is served by the Piccadilly line, and is also served by several local buses. There is further residential development on the opposite side of the canal. The site covers an area of approximately 2.68 ha. The site contains an Industrial Estate which is in use.

There are some trees within the site boundary; within the north-west corner, alongside the canal adjacent to the site boundary, and within Edwards Yard.

Further industrial buildings are located adjacent to the east. To the west of the application site lie residences on Woodside Place and Woodside End. Woodside Close and Mount Pleasant lie to the North. The Grand Union Canal lies to the south.

### **The Size and Design of the Proposed Development**

The proposed development is for the demolition of the existing industrial estate and construction of a mixed-use development for up to 700 residential dwellings, in the form of 1, 2 and 3-bedroom flats and 3-bedroom houses ranging from 3 to 14 storeys in height and an element of commercial floorspace (retail/ employment); an element of D1 community use; a new access road and associated development including landscaping.

### **Information Provided in Support of the Request for a Screening Opinion**

The request for screening opinion has been submitted with the following environmental reports:

- Ecology Appraisal;
- Phase 1 Desk-top study
- Phase 2 Environmental Report (inc. appendices)
- Flooding and Drainage Review
- Archaeology desk-based assessment;
- Transport Statement including Framework Travel Plan;
- Air Quality Assessment;

- Noise Assessment;

The results of these environmental reports have been utilised, as necessary, to inform this EIA Screening Opinion.

### **Previous History**

It is important to consider both the existing and approved land use for the proposed development.

#### Previous planning history / Screening Opinions

### **Planning History**

There is no recent planning history regarding the site as a whole. The same site was however subject to a screening opinion dated 15<sup>th</sup> October 2013. This was for the erection of a residential development of up to 9 storeys and up to 640 dwellings with a small A1 (Retail) unit also proposed within the development along with associated car parking and landscaping. The existing buildings on site would be demolished. This Screening Opinion concluded that the proposed development was not EIA development.

### **Large Scale Development within the Vicinity**

Within the vicinity there are currently the following applications for significant developments which have not yet commenced/ been completed to take account of when assessing the impact of the cumulative impact of the proposed development subject of this screening opinion in association with other developments:

16/0389 (Mr Kohli) 100 Beresford Avenue Outline application for demolition of existing warehouse and 3 storey offices and erection of one six storey and one three storey building comprising 71 residential units (24 x 1bed, 27 x 2bed and 20 x 3bed) and children's nursery, with associated basement level for car and cycle parking spaces, bin stores, landscaping, amenity space and fencing. (No decision made, discussions on-going to encourage submission of an amended primarily residential scheme).

16/4478 (Inland Homes) - Demolition of existing buildings at Abbey Wharf, Delta Centre and all of 152 Mount Pleasant and redevelopment to provide a residential-led, mixed-use development of up to 6 storeys comprising 135 residential units (34 x 1bed, 79 x 2bed and 22 x 3bed) and 247sqm of commercial space (A1, A2, A3, B1, D1 and D2), landscaped amenity space, car and cycle parking and associated works. (Approved 18 December 2017).

18/0321 (St George Developments plc) - Former Northfield Industrial Estate & units 2-18 Beresford Avenue & Abbey Works Estate, Wycombe Road, Wembley, HA0 & Ace Corner & Capital House, North Circular Road, London, NW10 Hybrid planning application for the redevelopment of Northfield industrial estate: Outline planning permission for the demolition of existing buildings and structures on the site, all site preparation works and redevelopment to provide new buildings ranging from 35.75m AOD to 111.95m AOD in height, with a total floorspace (GEA) of up to 309,400 sq m (excluding basement up to 42,000 sq m GEA) to accommodate 2,900 homes (Use Class C3), business and storage and distribution (Use Classes B1a, B1c and B8), commercial (Use Classes A1, A2, A3, A4 and A5), community and leisure (Use Classes D1 and D2) including community centre and nursery, new basement level including energy centre, associated storage, cycle and vehicle parking, new vehicular accesses, associated highway works to Beresford Avenue, landscaping and creation of new public and private open space, ancillary facilitating works, various temporary meanwhile uses, interim works and infrastructure. Full planning permission for demolition of existing buildings and structures on the site, all site preparation works and the development of Phase 1 (Buildings A, B, C and D ranging from 1 to 14

storeys in height) to comprise 402 homes (Use Class C3); 910 sq m (GEA) of business floorspace (Use Class B1a); 1,290 sq m (GEA) of commercial floorspace (Use Classes A1, A2, A3, A4 and A5); and 1,610 sq m (GEA) of community and leisure floorspace (Use Classes D1 and D2), including a community centre and nursery; together with new basement level including energy centre, associated storage, cycle and vehicle parking, new vehicular accesses, associated highway works to Beresford Avenue, landscaping and creation of new public and private open space, ancillary facilitating works, various temporary meanwhile uses, interim works and infrastructure. (Target date for decision 4 May 2018)

16/2629 (R55 and Genesis Housing Association) - Minavil House, Rosemont Road, Wembley, HA0 4PZ Demolition of existing two storey commercial buildings and erection of a mixed used development ranging from ten to twenty six storeys in height, comprising 251 residential flats (83 x 1bed, 136 x 2bed and 32 x 3bed), 1,942 sqm retail foodstore (Use class A1) on the ground floor, 622sqm of office space (Use Class B1) on the first floor, 634sqm retail floorspace for flexible use as cafe, bar or restaurant (Use class A1, A4 or A3) at lower ground floor and ground floor level; together with associated vehicular access, car and cycle parking spaces, bin stores, plant room, landscaping and private and communal amenity space. Decision: Minded to Approve Subject to signing of a S106 obligation.

16/3606 (HKDD Properties Ltd) 245-249 and 253 Ealing Road, Wembley, HA0 1EX Redevelopment of the site to provide two new buildings of part 9 and part 10 storeys high to accommodate 92 flats (10 x studios, 42 x 1 bed, 25 x 2 bed and 15 x 3 bed units), ground floor commercial use within Use class A4 (drinking establishment) or Use class D1 (community centre) with associated basement for car and cycle parking spaces and storage, vehicular crossover, bin stores, amenity space, landscaping and associated works (Revised plans submitted changing the floorplans and elevations of Block B and Daylight/Sunlight Report addendum). Decision: Minded to Approve Subject to signing of a S106 obligation.

17/3244 (Bravo Wembley Limited) Wembley Point, 1 Harrow Road, Wembley, HA9 6DE Installation of new modernised facade to the three elevations of the building with associated external alterations. This is in association with numerous prior approvals for the conversion of the existing office block into residential totalling 440 studio apartments. Decision: Approved.

#### London Borough of Ealing

17/2220/FUL Twyford Abbey Twyford Abbey Road Park Royal London NW10 7DP Redevelopment of the site for use as a secondary and sixth form school (D1 Use Class) involving the construction of two part three-storey, part four storey buildings; construction of a single storey building within the walled garden; construction of a single storey building with swimming pool; construction of two gatehouses to provide ancillary offices and accommodation; exterior works to Twyford Abbey including demolition of later additions; and associated tree works, boundary treatments, hard and soft landscaping including the provision of a multi-use games area; and access and parking provision. Granted with conditions 17 Nov 2017

#### Old Oak & Park Royal Development Corporation Area

17/0076/FUMOPDC Fairview L&Q Park Royal LLP First Central, Lakeside Drive, London, NW10 7HQ Residential-led, mixed use redevelopment of the site to provide three new courtyard blocks, ranging from 5 storeys to 27 storeys in height comprising 807 residential units (Use Class C3), a 377sqm (GIA) children's nursery (Use Class D1), 977sqm (GIA) of flexible retail/employment floor space (Use Classes A1, A2, and B1) with publicly accessible open space, private and shared amenity space; hard and soft landscaping; alterations to

existing, and creation of new, vehicular accesses and pedestrian routes; substation; servicing bay on Lakeside Drive, car and cycle parking and associated works. Granted 14<sup>th</sup> November 2017

### **Other Environmental Assessments**

Regulation 5(4)(b) of the EIA Regulations requires the relevant planning authority to take into account the results of any relevant EU environmental assessments.

### Current Local Plan

The current Brent Local Plan consists of the Core Strategy (2010), Site Specific Allocations (2011), Wembley Area Action Plan (2015) and Development Management Policies (2016) Local Plans and the West London Waste Plan (2105). Together these documents provide spatial policies, development management policies and site allocations to guide and manage development in the borough.

Sustainability Appraisals (SA) for all these Local Plan documents were undertaken. The SAs satisfied the requirements of the EC Directive 2001/42/EC and Strategic Environmental Assessment (SEA) Regulations on the assessment of the effects of certain plans and programmes on the environment.

These documents have been referred to when generating the EIA Screening Opinion.

### Local Plan to 2041

It is noted that the Council is currently consulting on their new Local Plan. This round of consultation (known as the regulation 18 stage) represents the early stages of comment on the content of the plan and how it has been prepared. The Council intend to submit the Plan to the Secretary of State for examination in 2019. Once adopted, this document will be the key strategic document to guide and manage development in the borough until 2041. An Integrated Impact Assessment (IIA) will accompany the new Local Plan, which incorporates the SA and SEA – that consider the potential for significant economic, social and environmental effects. This document has been considered when generating the EIA Screening Opinion.

### Masterplan / SPDs

The site lies within the Alperton Masterplan SPD area, Woodside Avenue site allocation (A6) and part of Mount Pleasant / Beresford Avenue site allocation (A7). A SEA Screening exercise was undertaken for this SPD, but due to its alignment with the Council's existing policies, no SEA was deemed to be required.

### Legislation

The proposed development does not fall within any of the descriptions of development listed in Schedule 1 of the EIA Regulations, and is therefore not a 'Schedule 1 development'. The development does, however, fall within the description of a Schedule 2 development, classified under item 10 (b) as 'urban development projects'.

'Schedule 2 development' means development (other than exempt development – which this is not) of a description mentioned in Column 1 of the table in Schedule 2 where:

- a) any part of that development is to be carried out in a sensitive area; or
- b) any applicable threshold or criterion in the corresponding part of Column 2 of that table is respectively exceeded or met in relation to that development.

No part of the proposed development is to be carried out in a 'sensitive area' as defined by the EIA Regulations.

The threshold for item 10(b) is as follows:

- (i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or
- (ii) the development includes more than 150 dwellings; or
- (iii) the overall area of the development exceeds 5 hectares.

The proposed development is for approximately 700 residential units. As such, it exceeds the threshold for 150 dwellings, and therefore the proposed development therefore constitutes 'Schedule 2 development'.

Consideration must therefore be given to whether the proposed development may give rise to significant environmental effects, such that an EIA may be required.

### **Likely Significant Effects**

The ultimate stage in the screening process is to consider whether it is '*likely to have significant effects on the environment by virtue of factors such as nature, size or location*'. As required by regulation 5(4)(c), where a relevant planning authority has to decide whether Schedule 2 development is EIA development, they must take into account the selection criteria set out in Schedule 3 as are relevant to the development.

The Council has taken into account the selection criteria set out in Schedule 3, where relevant to the proposed development. This include the characteristics of the development, the environmental sensitivity of geographical areas likely to be affected, and the likely significant effects in relation to these criteria, with regard to the factors specified in regulation 4(2) and taking into account the types and characteristics of the potential impact listed in paragraph 3.

In addition, as required by regulation 5(5)(a), where the relevant planning authority adopts an EIA Screening Opinion they must state the main reasons for their conclusion with reference to the relevant criteria listed in Schedule 3. Within this Statement of Reasons, the Council has stated the main reasons for their conclusion, referencing the relevant criteria listed in Schedule 3 as appropriate.

The Council has concluded that the proposed development does not require an EIA to be undertaken to accompany a planning application for the proposed development as the proposed development is not likely to generate significant environmental effects – Appendix A (below) sets out the reasoning for this decision.

## **Appendix A – Consideration of Likely Significant Effects**

### **Air Quality**

The site is located within the Brent Air Quality Management Area (AQMA). The majority of Brent has been designated as an AQMA. The AQMA has been declared for exceedance of the annual mean national objective for nitrogen dioxide (NO<sub>2</sub>) and the 24 hour mean national objective for particulate matter (PM<sub>10</sub>).

There are a number of sensitive receptors in close proximity to the proposed development site, including the residential properties and businesses.

#### Documentation Accompanying the Planning Application

Aether was commissioned to undertake a detailed air quality assessment to accompany the proposed development.

### Construction

Machinery used during construction can generate new sources of emissions, as well as traffic movements to/from the site and the works themselves.

When assessing the effect of dust emissions generated during construction works, receptors are defined as the nearest potentially sensitive receptor to the boundary of the site in each direction. These receptors have the potential to experience effects of greater magnitude due to emissions of particulate matter generated by the works, when compared with more distant receptors.

The receptors in close proximity to the site, combined with the new emissions, means that there is the potential for adverse effects as a result of the construction proposed development.

Whilst there is the potential for adverse effects, with the implementation of standard best practice measures, it is not anticipated that the effects would be significant. This is acknowledged in the air quality assessment that concludes that the effect of dust soiling and PM<sub>10</sub> can be reduced to negligible with the implementation of appropriate mitigation measures – these measures are listed in section 3.3 (page 11) of the air quality assessment. These standard mitigation measures can be implemented through a construction environmental management plan (CEMP), which can be secured through a standard planning condition.

As such, whilst there is the potential for adverse effects as a result of the proposed construction, with the implementation of standard mitigation measures, it is not anticipated that the environmental effects would be so significant to require EIA.

### Operation

Air quality emissions during operation will be from new traffic generation and any Combined Heat and Power Plant (CHP). A presumption is noted to use gas-fired installations as opposed to biomass. Where biomass is proposed, it is to meet minimum emissions standards.

Consideration also needs to be given to the potential effects on the new internal receptors given the location for the proposed development adjacent to a main road.

The Transport Statement confirms that a full transportation and access impact assessment using TRICS data will be carried out, supported by a multi-modal trip generation assessment, baseline walking and cycling assessment and parking surveys. These will be used to prepare a full Transport Assessment including prospective street layout improvements. Paragraph 2.3.3 of the Transportation and Access Statement states:

“Initial indications show that the level of net traffic generation resulting from this development is unlikely to be significant and could be adequately accommodated on the surrounding highway network. Detailed scoping discussions will be carried out with the Highway Authority during the preparation of the Transport Assessment to ensure that any off-site impacts are tested and suitably mitigated.”

In addition it is confirmed in paragraph 3.1.7 that the application will be supported by a Residential Travel Plan including details of measures to reduce single occupancy car travel, provide a new cycle route and appropriate levels of cycle parking.

In conjunction with a reduction of employment use on the site, it is considered that the impact from vehicle emissions would be minimal, and the Authority is satisfied that the proposed transport submissions would negate any potential for significant environmental effects and need for an EIA in this respect.

#### Mitigation- Construction Phase

The mitigation measures identified in Section 3.3 of the air quality assessment should be secured via a planning condition and adhered to during construction.

A CEMP should be secured by condition that includes standard mitigation measures to reduce emissions.

The developer should consider the potential impact of air quality and dust on occupational exposure standards (to minimise worker exposure) and breaches of air quality objectives that may occur outside the site boundary. Monitoring is not recommended in the air quality report - however, continuous visual assessment of the site should be undertaken and a complaints log maintained in order determine the origin of a particular dust nuisance.

#### **Local Heritage**

Documentation Accompanying the Planning Application: Archaeological Desk-Based Assessment, CgMs Heritage, January 2018.

The Site does not lie within or near a Conservation Area or an Archaeological Priority Area. There are four statutory listed buildings located within 1km of the Site, the closest of which is the Garden Wall to the north of Twyford Abbey. There are locally listed buildings; Alperton Station and properties along Stanley Avenue.

The site can be considered to have a generally low archaeological potential for all past periods of human activity. Past post depositional impacts are considered severe as a result of previous development. On the basis of the available information no further archaeological mitigation measures are recommended in this particular instance.

The Council considers that given the scale of the development and the urban nature of its location the proposed development would not lead to significant adverse environmental effects on heritage assets, as such EIA is not required in respect of heritage impacts.

It is important to note, that whilst the effects are not considered to be significant in relation to the EIA Regulations, this does not preclude the Council from taking into account the adverse effects (and their acceptability) when determining the planning application.

### **Climatic Factors**

Documentation Accompanying the Planning Application – none. However Air Quality and Transport information has been submitted.

### Construction

Emissions from construction traffic and plant can contribute towards the region's greenhouse gas emissions. Due to the size of the proposed development the emissions are not considered to be substantial, and therefore no significant effects are anticipated. It is advised that sustainable methods of working should be implemented to reduce any emissions, and should be implemented as part of the CEMP.

### Operation

It is considered that the proposed development will be able to achieve the necessary carbon reduction targets, through actual reductions combined with financial contributions. The effects of which are beneficial, but are not considered to be significant.

### Mitigation

A CEMP should be secured that includes measures to reduce emissions e.g. management to prevent plant running when not in use. Regarding the ongoing energy requirements of the finished project, standards are set out within Part L of the Building Regulations, compliance with which would generally be secured by means of a submission condition for a sustainability plan and compliance condition with regards to Part L. It is considered that these measures would be sufficient to mitigate the impact of the development so that no significant environmental effects should arise which would require the need for an EIA.

### **Contaminated Land**

Documentation Accompanying the Planning Application

A Phase 1 Desk Top Study Report (walk-over survey) has been undertaken by Herts & Essex Site Investigations (January 2018).

The Phase 1 Environmental Assessment concludes that a range of potential sources of contamination relating to the historical land use of the site and the surrounding land uses, may be in place within the upper subsoil and potentially have migrated in to the lower geology that is underlying any superficial fill deposit. Vapour risk is also potentially in place from on-site sources. The identified sources, pathways and receptors are detailed on pages 17-23 of the report. Recommended further investigations are summarised on Page D and Table 21 of the report, and detailed in Section 16 (pages 24-25).

In addition, to inform the EIA Screening Opinion, the applicant has provided a Phase 2 Contamination Assessment and Outline Remediation measures for the site.

This submission confirms on page 12 that further testing will be required due to the current access limitations across the site, and that remediation works are likely to be required due to widespread contamination typical of an area that has been in industrial use, across the site.

The report states that a remediation strategy report will also be required, to confirm the extent of best-suited works to remove any risk.

The use of conditions to secure the completion of the required reports and works is standard practice and as such it is considered that no significant environmental effects should arise which would require the need for an EIA.

### **Daylight, Sunlight and Overshadowing**

There are a number of sensitive receptors in close proximity to the proposed development site, including residential properties and businesses.

Documentation Accompanying the Planning Application- none. Confirmation was received verbally from the agent that the storey heights would vary from 3 storey up to 14 storey. The lower heights would be on the residential edges, whilst increased height would be along the canal side edge with the greater height in the site's centre.

### Construction

During construction, there will be a change in the provision of daylight/sunlight due to the construction equipment (i.e. cranes) and the erection of the new buildings.

The construction equipment will be temporary and short-term, and therefore not considered to be significant.

The erection of the new buildings will generate some adverse effects as it is built out. The construction effects will however be no greater than the completed, operational development.

### Operation

The operation of the proposed development will introduce buildings up to 14 storeys onto the site. The higher buildings would be situated towards the canal side/ centre of the site, with buildings around the residential edge of the site at provisionally 3 storeys. Due to the proximity of nearby sensitive receptors and the height there is the potential for the proposed development to affect surrounding receptors, and it is considered that a BRE assessment would be required. This will be subject to assessment as part of the normal planning process.

### Mitigation

No discipline specific mitigation has been relied upon for the EIA Screening Opinion. Effects of daylight loss, sunlight loss and overshadowing would be assessed throughout the planning process, and it is required that a BRE (daylight and sunlight) report is submitted with the application, to examine the possible effects of the development on surrounding properties. Based on the information submitted no significant environmental effects should arise in relation to daylight, sunlight and overshadowing which would require the need for an EIA.

It is important to note, that whilst the effects are not considered to be significant in relation to the EIA Regulations, this does not preclude the Council from taking into account the adverse effects (and their acceptability) when determining the planning application.

### **Biodiversity (including flora and fauna)**

Documentation Accompanying the Planning Application

An Ecology Desk-based Appraisal, compiled in January 2018, has been submitted with the application.

There are no designated sites (SSSI or LNR) within sufficient range of the site to be affected by the construction or operation of the site. Measures are proposed to protect the canal and its potential associated species during the demolition, construction and occupation phases of a development at the Site.

The report states that: The Site itself is likely to be mainly of negligible ecological interest, comprising industrial buildings and hardstanding. The potential for protected species is likely to be negligible. It is recommended that an Extended Phase 1 Survey is undertaken to confirm the findings of this desk based appraisal, assess the buildings' potential to support roosting bats, nesting birds and to determine the presence/ absence of any invasive species. Based on the information assessed, there is not likely to be any significant effect or cumulative effect of a development at the Site on ecology. Therefore, this should not be a matter for an Environmental Impact Assessment (EIA) but instead a consideration within the normal planning application process.

The ecological appraisal included a standard Phase 1 habitat survey methodology that was extended to record provisional signs or evidence of protected or notable species. The appraisal concluded that the site is entirely covered by hardstanding. No evidence of protected species was found anywhere within the site, however evidence of species as detailed in the report in section 4 were found in the surrounding area, The site itself is considered to have negligible intrinsic ecological value as it is mainly made up of buildings and hardstanding, with small areas of peripheral vegetation. As such, no significant effects are considered to be likely. The buildings are considered to provide low-negligible opportunities for bat roosts and limited bat commuting interest. The buildings are not considered to be suitable to support rare or notable bird species however common bird species may use the site for nesting purposes.

#### Further survey requirements

An Extended Phase 1 Survey is recommended to confirm the findings of the desk-based appraisal and determine the presence / absence of any protected or invasive species. In addition this survey should assess the buildings' potential to support roosting bats or nesting birds.

#### Mitigation

There is the potential to effect environmental enhancements, as encouraged by the NPPF, to provide net gains in biodiversity, and these are detailed on page 12 of the Ecology Desk Based Appraisal.

#### Summary- Ecology

It is considered that, provided the additional survey is carried out as recommended by the appraisal, and any resultant measures employed, the desk based appraisal identifies impact can be mitigated and as such no significant environmental effects should arise which would require the need for an EIA.

#### **Flood Risk**

Documentation Accompanying the Planning Application  
A technical note by CgMs has been provided.

The site is located within Flood Zone 1, and is therefore considered to be at low risk to fluvial flooding. The site is adjacent to the Grand Union Canal, which it is stated, would carry an equally low risk of flooding. Although not specifically covered by the technical note, in terms

of surface water flooding the site is at very low risk, with only a small part adjacent to Woodside Place shown to have 'less' susceptibility to surface water flooding. The site has no identified groundwater flooding vulnerability. As the site is more than 1hA in size, a Flood Risk Assessment (FRA) will need to be completed under the requirements of the NPPF.

### Construction

Given the scale of the development and its location within flood zone 1, the construction of the proposed development is not considered to significantly affect flood risk.

### Operation

The proposed development site is located in an area at low risk of fluvial flooding; however the proposed development does have the potential to affect the onsite infiltration rates through changes to the amount of hardstanding. That said, given the scale of the development and its location within flood zone 1, the operation of the proposed development is not considered to significantly affect flood risk.

In addition, as the site is located within the area covered by the London Plan, the surface water runoff design will need to be undertaken in accordance with the requirements of the London Plan utilising sustainable drainage systems (SuDS). As a brownfield site the design will be based on achieving a discharge limit based upon 50% reduction of surface water runoff at peak times.

In order to achieve this, the following methods will need to be considered:

1. storage of rainwater for later use
2. infiltration through use of porous surfaces to external landscaped areas
3. attenuate rainwater by storing in tanks for gradual release
4. discharge rainwater to the combined sewer

The information submitted indicates that the attenuation of rainwater by storing in tanks for gradual release and/or discharging rainwater to the combined sewer are likely to be the principal methods adopted. This will be secured through an appropriately worded planning condition, which is considered beneficial, but not significant.

It is stated that foul sewers shall be designed in accordance with Sewers for Adoption (SFA) 7th Edition (Water UK/WRC plc, 2012), and that capacity and requirement for pumping stations will be considered throughout the planning stage.

### Mitigation

The implementation and management of SuDS should be secured through a planning condition. Details of site drainage and water considerations are generally secured via standard conditions and details are provided to the local water authority.

It is not considered that the proposed redevelopment would give rise to significant environmental impacts related to flooding or drainage that cannot be prevented by suitable layout of the site and detailed design of the drainage system, including the integration of SuDS.

In relation to surface water risk as an access point to the site, buildings are unlikely to be placed in this location and effective storage of water can be dealt with through design to ensure safe access and egress.

As such in relation flood risk no significant environmental effects should arise which would require the need for an EIA.

### **Human Health**

It is considered that human health (both of existing and new receptors) has been appropriately considered within the relevant topic sections (e.g. water contamination or air pollution) and as such, reference should be made to these sections as required.

### **Land (land take)**

The construction and operation of the proposed development will utilise Industrial land to provide a mixed use and residential development. This is not considered to generate any significant environmental effects in itself. No specific mitigation has been relied upon for the EIA Screening Opinion.

### **Material Assets**

The construction and operation of the proposed development will utilise material assets, but given the scale of the development this is not considered to be substantial. As such, significant effects are not considered to be likely. No discipline specific mitigation has been relied upon for the EIA Screening Opinion.

### **Major accidents and/or disasters**

It is considered that the risk from major accidents and/or disasters (both of existing and new receptors) has been appropriately considered within the relevant topic sections (e.g. flood risk) and as such reference should be made to these sections as required.

### **Noise and Vibration**

Documentation Accompanying the Planning Application

A Noise Assessment has been submitted with the planning application. The site is near to Mount Pleasant (17-20m) along one border, and consideration has also been given to other surrounding streets, and any effects from the Heathrow flightpath. A survey of the existing noise and vibration levels has been carried out.

### Construction

Machinery used during demolition/construction can generate new sources of noise, as well as construction traffic movements. The nearby receptors combined with the new noise emissions, means that there is the potential for adverse effects as a result of construction activities.

The noise assessment does not include any consideration of noise and vibration effects during the construction phase. The Planning Statement does however state that 'There should be close liaison between all Contractors and the Local Authority during the demolition and construction phases of the developments therefore and the guidance notes set out in British Standard BS5228 Part 1:2009 should be strictly followed.'

Given the scale of the development, standard impact avoidance measures can be implemented to reduce emissions from construction activities, which will be secured through the CEMP. The works will be required to adhere to the Council's Code of Construction Practise (CoCP) (e.g. restricting the time at which works can be undertaken) which ensures that adverse effects are appropriately controlled and minimised. No significant environmental effects are therefore anticipated.

## Operation

The proposed residential use is not considered to be inherently noisy. Some noise may be generated from the operation of mechanical plant and building services within businesses, but plant noise emissions will be required to meet local policy requirements and British Standards. Adherence to these values will ensure that new and existing receptors are not adversely affected, and will ensure that there will be no significant environmental effects.

There is minimal potential for new residents to be affected by adverse noise due to the site's location. The Noise Assessment confirms that distance attenuation and building screening would mitigate noise to residents. The proposed development can be designed with consideration to the location of the development and the potential noise attenuation secured through planning conditions and/or Part F of the Building Control requirements. No significant environmental effects are anticipated to warrant an EIA.

### **Socio-Economic (including population)**

No specific report has been provided. The site is currently used for employment purposes, incorporating a number of small firms employing a small number of people. These firms will be displaced to other sites, or may be prompted to cease trading, resulting in the loss of some local employment. The allocation of site for housing development however considered the wider impacts of loss of employment land across the borough as part of the Sustainability Appraisal associated with the adoption of the Local Plan. The likely loss of employment space was regarded as acceptable in relation to the benefits of bringing the site forward for residential purposes. It would also bring improvements to existing residents' environment through the removal of 'non-conforming' uses accessed through residential streets. In the context of the draft London Plan's designation as 'provide capacity' for industrial floorspace there however may now be a need to reconsider provision of employment space on site. Although the proposal is for mixed use development, it is not currently clear how much floorspace this will incorporate and the types of uses and therefore the number of jobs once completed.

The site has access to a range of social infrastructure such as schools, health facilities and open space that are in close proximity which residents will anticipate access to/ use of.

## Construction

It is considered that the proposed development would create benefits to local employment though providing temporary employment during construction.

Use of local labour for training/ apprenticeships consistent with policy may be secured via condition if considered appropriate.

## Operation

The site will provide some non-residential uses that may assist in providing employment as well as potential social infrastructure to support the new and surrounding local community. The provision of approximately 700 new homes will be beneficial in meeting identified total housing needs, as well as those for affordable and accessible properties. This is much larger than was anticipated in the site allocation policy. Opportunities to incorporate more employment uses than envisaged in the site allocation will be considered during the planning application process, subject to its impact on creating a viable and acceptable development.

## Mitigation

Financial contributions, principally through Community Infrastructure Levy (CIL) payments will be sought to mitigate the effects of increased population/users. S106 will be sought to

control provision of on-site affordable housing and any social infrastructure or replacement employment space considered necessary to make the development acceptable in planning terms.

It is not considered that there would be significant environmental effects in relation to the socio-economic matters that should warrant an EIA.

### **Soil (organic matter, erosion, compaction, sealing)**

#### Construction

There is the potential for some loss of organic matter, erosion, compaction and sealing during the demolition/construction phase; however, the implementation of a CEMP during the construction phase will ensure that standard mitigation measures are implemented.

#### Operation

The operation of the completed development is not anticipated to affect organic matter, erosion, compaction and sealing. As such, significant effects are not considered to be likely.

#### Mitigation

It is considered that the implementation of the CEMP during the construction phase is sufficient to mitigate any requirement for an EIA.

### **Telecommunications**

There is no specific requirement within the EIA regulations for Telecommunications information. Information should cover the 'likely significant effects'. Guidance on non-ionising radiation as a result of magnetic fields e.g. from mobile telephone masts, is provided by the International Commission on non-ionising radiation protection. Any mobile communications operator installing or upgrading a mast or other equipment must submit an ICNIPR declaration. Radio equipment is covered by the Radio Equipment Legislation 2017. The height of the taller buildings may impact on the quality of television reception in the near locality, but on the basis of information provided with other sites in the vicinity the impact is not to be significant.

It is considered that there is no known significant likelihood at this stage, of detrimental effects from or on telecommunications that would warrant the submission of an EIA.

### **Townscape and Visual Impact**

No assessment of visual impact has been submitted with the screening opinion. In the context of its existing immediate surroundings the proposed development will introduce tall buildings. The site does however not lie within a London View Management Framework strategic view, or local area with protected views.

#### Construction

The construction works are likely to require large cranes/ equipment, and therefore there is the potential for adverse effects on views and townscape. That said, given the relatively short term, temporary nature of the construction works and the scale of the development, effects are not considered likely to be significant. Supplementary mitigation can be implemented through the use of hoarding, to provide a physical/visual barrier to the works.

#### Operation

The provision of 11 storey and 14 storey properties as the tallest elements of the scheme plus other taller buildings within the current context of principally two storey properties will

impact on the townscape. Other applications in the vicinity, albeit with taller buildings proposed, have submitted Townscape and Visual Impact Assessments. These have found no significant adverse impacts related to those proposals. As such, the Council considers that the current planning application will lead to some adverse effects on townscape and views, however given the scale of the development and the urban nature of its location, significant effects are not considered likely.

It is important to note, that whilst the effects are not considered to be significant in relation to the EIA Regulations, this does not preclude the Council from taking into account the adverse effects (and their acceptability) when determining the planning application.

### Mitigation

During construction, ensure the erection and maintenance of hoarding. In terms of operation, sensitive scaling and the location and design of taller buildings to reduce adverse impact will be considered as part of the planning application process.

### **Traffic and Transport**

The site is partly located in PTAL 2 (relatively poor) and partly in PTAL 3 (moderate).

### Documentation Accompanying the Screening Request

A Transportation and Access Technical Note has been submitted with the screening request. This considers Demolition/ Construction phase impacts, and Operational impacts.

The Technical Note confirms that a full transportation and access impact assessment using TRICS data will be carried out, supported by a multi-modal trip generation assessment, baseline walking and cycling assessment and parking surveys.

These will be used to prepare a full Transport Assessment including prospective street layout improvements. Paragraph 2.3.3 of the Transportation and Access Statement states:

“Initial indications show that the level of net traffic generation resulting from this development is unlikely to be significant and could be adequately accommodated on the surrounding highway network. Detailed scoping discussions will be carried out with the Highway Authority during the preparation of the Transport Assessment to ensure that any off-site impacts are tested and suitably mitigated.”

In addition it is confirmed in paragraph 3.1.7 that the application will be supported by a Residential Travel Plan including details of measures to reduce single occupancy car travel, provide a new cycle route and appropriate levels of cycle parking.

In conjunction with a reduction of employment use on the site, it is considered that the impact from vehicle emissions would be minimal, and the Authority is satisfied that the proposed transport submissions would remove any significant environmental effects and as such the need for an EIA in this respect.

It is stated that a full multi-modal assessment of prospective generated trips will be prepared as part of the transport assessment. The outline scope of the assessment is described in section 2.4 of the Technical Note

### Construction

The transport assessment does not include any consideration of transport impacts during the construction phase. There will be an increase in the number of vehicles accessing the site

during the construction phase, however, given the scale of the development the anticipated numbers are not considered to be substantial.

It is considered that any adverse effects can be mitigated through a construction logistics plan (CLP) (potentially included as part of the CEMP) to control transport movements.

With the implementation of standard mitigation measures, no significant effects are anticipated.

### Operation

Initial indications show that the level of net traffic generation resulting from this development is unlikely to be significant and could be adequately accommodated on the surrounding highway network. Detailed scoping discussions will be carried out with the Highway Authority during the preparation of the Transport Assessment to ensure that any off-site impacts are tested and suitably mitigated to remove any significant environmental effects.

### Mitigation

Prospective mitigation measures are described in Section 3 of the Transportation and Access Technical Note.

### Summary

It is considered that suitable conditions to require a Construction and Logistics Plan, in combination with the proposed traffic reduction measures, taking account of the Transport Assessment to be submitted within an application, described in section 3 of the Transportation and Access Technical Note would be sufficient to mitigate the environmental effects of any increased traffic flows. As such no significant environment effects are anticipated to require EIA.

### **Waste**

Documentation Accompanying the Screening Request- none.

### Construction

No waste assessment has been submitted with the request, however the management of construction waste is covered by the Waste Duty of Care Legislation (2016), issued under section 34 of the Environmental Protection Act 1990. There is no longer a legal requirement for a Site Waste Management Plan, although this is recommended.

### Operation

The inclusion of suitable waste facilities for residents is covered under part H6 of the Building Regulations, and to ensure this, inclusion of separate facilities for general waste, recycling and organic materials is normally assessed for capacity and suitability as part of the normal planning process. The capacity required should be discussed at pre-application stage with reference to the 2015 Brent Council guidance.

There is a commercial element to this application; commercial waste is covered under the same legislation as construction waste, above.

The decision notice should include suitable conditions to ensure that waste facilities for residents and businesses are provided prior to occupation. With the implementation of these

mitigation measures and in conjunction with other more relevant legislation, there is no requirement for an EIA.

### **Water Quality (hydromorphological changes, quantity and quality)**

Documentation Accompanying the Screening Request- none

No standalone water quality assessment has been submitted, neither was there any reference to this within the material submitted.

#### Construction

During the construction process there is the potential to affect water quality through accidental pollution events, such as fuel spills and increased sediment within surface water passing through to adjacent watercourses. The implementation of standard impact avoidance measures should be secured through the CEMP. With the implementation of standard impact avoidance measures to ensure that the site is adequately protected, no significant effects are anticipated. It is not considered, given the scale of the development and works proposed that there will be any significant effects on either water quantity or hydromorphology during construction.

#### Operation

There is the potential the operation of the proposed development to affect the foul and surface water capacity/quantity due to an increased demand. Whilst there may be an increase in demand, given the scale of the development, it is not considered to lead to significant effects. It is not considered, given the scale of the development and the implementation of SuDS (refer to Floor Risk section above) that there will be any significant effects on either water quality or hydromorphology once operational.

#### Mitigation

A CEMP should be secured that includes measures to protect against and deal with accidental pollution events. The implementation and management of SuDS should be secured through a planning condition. This is normal practice for a major application.

### **Wind**

Documentation Accompanying the Planning Application: none. (Massing / heights not yet finalised)

#### Construction

It is recognised that throughout the demolition and construction phase of the project, the cranes and the erection of the new structure may affect the local wind microclimate, however these effects are considered to be temporary and not anticipated to be significant.

#### Operation

The operation of the proposed development will introduce new buildings onto the site that will be up to 14 storeys in height. Therefore there may be adverse effects on the existing wind conditions. This can be assessed throughout the normal planning process. Mitigation measures can be incorporated into the development to reduce the impacts on those within and adjacent to the development to acceptable levels.

As such the it is not anticipated that the environmental effects will be of such significance to warrant EIA.

## **Cumulative Effects**

The 2017 EIA Regulations requires the consideration of cumulative effects through interactions being the combined effects of individual effects arising as a result of the development and also with other existing development and/or approved development.

In relation to the cumulative effects of the interactions related to the proposed development, taking account of the analysis and commentary above it is not considered that the impacts are such as to be so significant to warrant EIA.

There are number of major developments in the surrounding area that are likely to be built, as detailed in 'Large Scale Development within the Vicinity'. This takes account of the wider area, consistent with the EIA submitted in association with the Northfields development. The proposal in association with these wider developments may have the potential for cumulative impacts. The impacts of this needs to be considered when determining if the effects would be so significant as to warrant EIA.

### **Documentation Accompanying the Planning Application**

The cumulative impact assessment submitted with the screening opinion application identified two developments within the vicinity and placed weight on the consideration/ acceptability of the impacts of wider development through the Local Plan's Sustainability Appraisal identifying the site's allocation and the wider Growth Area designation.

The Council has considered a wider area consistent with the EIA submitted for Northfields given the proposed scale of this application and knowledge of the development proposed in the wider Alperton Growth Area and Old Oak Park Royal Opportunity Area. Three of the applications identified as part of the cumulative assessment were subject to Environmental Impact Assessments (Northfields, Minavil House and First Central). The Council has considered the information contained within these assessments related to the individual impacts and also the associated cumulative impacts of the proposals.

### **Demolition/Construction**

It is considered that no likely significant adverse cumulative construction effects will occur assuming the implementation of standard mitigation measures such as appropriate traffic management measures and construction routing; and maintenance of site hoardings and compliance with the mitigation measures detailed within the CEMP.

It is also assumed that the enabling works, demolition and construction phases associated with the other development schemes would adhere to legislative requirements, industry guidance and best practice as will be the case within the application sites. However, there remains the potential for cumulative effects to arise, particularly with respect to dust and noise.

The construction workers at the construction site of each individual cumulative scheme will have to adopt controls to prevent the significant transfer of airborne pollutants beyond their site boundaries and the use of monitoring to confirm the effectiveness of these measures. Therefore, cumulative effects at existing and future receptor locations would be appropriately managed by the contractors to avoid the occurrence of significant adverse cumulative effects. Cumulative effects during the enabling works, demolition and construction phase are therefore generally considered to be temporary, local and overall not significant.

## Operation

With regards to the matters considered in this opinion it is not considered that there will be significant adverse cumulative operational effects when the cumulative developments and the proposed development are operational.

It is anticipated that CIL and S106 will address capacity issues that might exist in relation to on and off-site infrastructure. However, in relation to healthcare provision, the Northfields EIA identifies moderate adverse cumulative effect is anticipated in relation to the demand on primary healthcare facilities. Taking into account the high numbers of residential units proposed arising from the Proposed Development and the committed developments, current provision will potentially be inadequate to meet additional demand. The committed developments may then, if not proposing on or off-site healthcare provision, have to mitigate any shortfall through S106 agreements and CIL contributions.