

BY EMAIL & POST

June Taylor
Planning and Regeneration
Brent Council
Brent Civic Centre
Wembley
Middlesex, HA9 0FJ

28820/A5/NP
8th October 2019

Dear June,

BRIDGEWATER ROAD, ALPERTON. LONDON BOROUGH OF BRENT – REQUEST FOR UPDATED EIA SCREENING OPINION

We write on behalf of the Applicant, Peabody Group, to seek an updated Environmental Impact Assessment (EIA) Screening Opinion from London Borough of Brent (LBB) in relation to a minor amendment to the proposed development at Bridgewater Road, in Alperton.

EIA Screening History

An EIA Screening Report was issued to LBB on 4th April 2019, and LBB subsequently adopted their EIA Screening Opinion on 10th April 2019, stating that Environmental Impact Assessment (EIA) was not required as part of the planning application. The EIA Screening Report is included at **Enclosure 1** and the EIA Screening Opinion is included at **Enclosure 2**.

At that time the description of the proposed development comprised the demolition of all the existing buildings on site, and the erection of three blocks (maximum height 104.310m AOD – indicatively 19 storeys) that will consist of up to 145 residential units, up to 850 sq.m of commercial floorspace, associated parking, and vehicular access and circulation.

A redline plan, which remains unchanged, is included within **Enclosure 1**.

Changes to the proposed development

The following iteration has been made to the proposed development:

- The proposed commercial floorspace provision as increased from 850 sq.m to a maximum of 2,000 sq.m.

Changes to prevailing baseline conditions and cumulative development

There have been no material changes to the baseline environment on the site since the submission of the EIA Screening Report in April 2019.

Schedule 4 of the EIA Regulations requires consideration of a proposed development cumulatively with other existing and/or approved development. Guidance on the consideration of cumulative effects in the EIA screening process is set out in the PPG, which echoes the requirements of the EIA Regulations:



"each application (or request for a screening opinion) should be considered on its own merits. There are occasions where other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development. The local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development."

Cumulative development was considered as part of the previous screening opinion and the Applicant is not aware of any additional approved developments which could have the potential to result in likely significant effects since April 2019.

Request for updated EIA Screening Opinion

In light of the amended commercial floorspace within the proposed development, we are writing to request a new EIA Screening Opinion. The proposed development, as set out within **Enclosure 1** and as amended within this letter, otherwise remains within the maximum thresholds on which the previous EIA Screening Opinion was based. We consider that the conclusions of the existing screening opinion remain valid and that EIA is not required. It is considered that the increased commercial floorspace of the proposed development would not have any significant environmental effects.

As also set out within this letter, there have been no material changes to the baseline environment and no additional cumulative development have been identified.

Based on the above, we formally request LBB to adopt an updated EIA Screening Opinion in accordance with Regulation 6 of the Town and Country Planning (EIA) Regulations 2017.

We would be grateful for confirmation of receipt of this request, along with the date on which the timescales expire and by which an opinion will be issued.

We look forward to receipt of the EIA Screening Opinion.

Should you have any queries or require further information please do not hesitate to contact me.

Yours faithfully



NEIL PURVIS

Senior Environmental Planner

Enc.

- (i) April 2019 Request for EIA Screening Opinion
- (ii) April 2019 LBB adopted EIA Screening Opinion

ENCLOSURE 1

EIA SCREENING REPORT – APRIL 2019

Bridgewater Road, Alperton

Environmental Impact Assessment Screening Report

April 2019

Bridgewater Road, Alperton

Environmental Impact Assessment Screening Report

Prepared on behalf of Peabody Group

Job Number:	28820/A5/EIA Screening Report		
Status:	Draft	Draft	Final
Issue/Rev:	01	02	03
Date:	23 rd July 2018	24 th July 2018	4 th April 2019
Prepared by:	JO	JO	NP
Checked by:	NP	NP	MM

Barton Willmore LLP
7 Soho Square
London
W1D 3QB

Tel: 020 7446 6888



COPYRIGHT

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Barton Willmore LLP.

All Barton Willmore stationery is produced using recycled or FSC paper and vegetable oil based inks.

CONTENTS

1	INTRODUCTION	1
2	SITE AND PROPOSED DEVELOPMENT.....	3
3	SCREENING ASSESSMENT	5
4	CONCLUSION	18

APPENDICES

APPENDIX 1: SITE LOCATION PLAN

1 INTRODUCTION

- 1.1 This report has been prepared by Barton Willmore, Institute of Environmental Management and Assessment (IEMA) qualified assessors and Environmental Impact Assessment (EIA) Quality Mark registrants, on behalf of Peabody Group (the 'Applicant'). The report accompanies a request to London Borough of Brent (LBB) to adopt a screening opinion to determine whether the proposed development of a residential-led, mixed use scheme of up to 145 residential dwellings and up to 850 square metres (sqm) of commercial floorspace on land at Bridgewater Road, Alperton constitutes EIA development.
- 1.2 This report reflects the requirements of the *Town and Country Planning (Environmental Impact Assessment) Regulations 2017*¹ (the "EIA Regulations") and in accordance with Regulation 6 of the EIA Regulations, this report contains:
- A plan sufficient to identify the land;
 - a description of the development, including in particular:
 - (i) a description of the physical characteristics of the development and, where relevant, of demolition works;
 - (ii) a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;
 - a description of the aspects of the environment likely to be significantly affected by the development;
 - to the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from—
 - (i) the expected residues and emissions and the production of waste, where relevant; and
 - (ii) the use of natural resources, in particular soil, land, water and biodiversity; and
 - such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

Requirement for EIA

- 1.3 In order to determine whether the proposed development is 'EIA development', regard must be had for the EIA Regulations and supporting Planning Practice Guidance² (PPG).

¹ SI 2017/571

² <http://planningguidance.planningportal.gov.uk/blog/guidance/environmental-impact-assessment/>

1.4 EIA development is defined by the EIA Regulations as development:

"likely to have significant effects on the environment by virtue of factors such as its nature, size or location".

1.5 EIA development falls into two Schedules of the EIA Regulations. EIA is mandatory for developments listed within Schedule 1. Schedule 2 developments require EIA if they would lead to likely significant effects on the environment.

1.6 In deciding whether a Schedule 2 development is EIA development, Regulation 5(4) states:

"Where a relevant planning authority ... has to decide under these Regulations whether Schedule 2 development is EIA development, the relevant planning authority ... must take into account in making that decision-

- (a) Any information provided by the applicant;*
- (b) The results of any relevant EU environmental assessment which are reasonably available to relevant planning authority...; and*
- (c) such of the selection criteria set out in Schedule 3 as are relevant to the development."*

1.7 In order to allow LBB to determine the need for EIA this report provides a description of the site and proposed development, a review of the EIA Screening Criteria based on the EIA Regulations and PPG, a completed EIA Screening Checklist, and a site location plan at Appendix 1.

2 SITE AND PROPOSED DEVELOPMENT

Site Context

- 2.1 The site is located in Alperton in the administrative London Borough of Brent. The north of the site is bound by the Piccadilly Line of the London Underground, with Alperton Community School and One Tree Hill Recreation Ground located beyond. One Tree Hill Recreation Ground includes a series of paths and a public right of way (PRoW).
- 2.2 Transport related infrastructure is located to the south-east of the site including two large buildings: Alperton Bus Depot and Garage. Alperton Underground station is located approximately 80m east of the site boundary, beyond which is the A4089 (Ealing Road).
- 2.3 The south west of the site is bound by Bridgewater Road (A4005). To the south of the site are a number of industrial and office units. The Grand Union Canal is located approximately 150m to the south of the site. Residential use is located to the west of the site, beyond the A4005. Immediately to the north-west of the site boundary is a car wash and a two-storey building, with the ground floor in commercial use. Further to the northwest is Bridgehill Close, beyond which is residential use.
- 2.4 The surrounding area to the south of the site is currently undergoing significant change, with a number of major developments that include high-rise buildings as described further in Table 1.

Site Description

- 2.5 The site (see site location plan at Appendix 1) extends to approximately 0.35 hectares (ha). and currently comprises a vacant car showroom of approximately 320sqm and a single storey row of industrial units, of approximately 300sqm.
- 2.6 The majority of the site is hardstanding with scrubby vegetation that surrounds the built development on the site.
- 2.7 The primary vehicular access to the site is directly off Bridgewater Road, to the southwest of the site.

Proposed Development

- 2.8 The proposed development comprises the demolition of all the existing buildings on site, and the erection three blocks comprising up to 145 residential dwellings and up to 850sqm of commercial floorspace.
- 2.9 The proposed development will also include up to eight disabled car parking spaces and cycle storage. Vehicular access will be provided via a one-way access road entered from the south-eastern corner of the site, off Bridgewater Road and circulates the site with the egress point located to the west.
- 2.10 The proposed maximum height of the buildings will be up to 19 storeys (104.310m AOD).

Mitigation

- 2.11 A number of mitigation measures will be considered to be part of the proposed development. This includes adherence to best practice measures during the construction phase, such as through a Construction Environmental Management Plan (CEMP).

3 SCREENING ASSESSMENT

Introduction

3.1 In determining whether the proposed development constitutes EIA development, consideration should be had to the following:

- If the proposed development is of a type listed in Schedule 1;
- If not, whether it is listed in Schedule 2;
- Is it located within a sensitive area;
- It meets any of the relevant thresholds and criteria set out in Schedule 2; and/or
- Would it lead to likely significant effects on the environment.

3.2 These points are explored further in this section with reference to the EIA Regulations and supporting PPG.

Schedule 1 Projects

3.3 EIA is mandatory for projects listed in Schedule 1 of the EIA Regulations. Schedule 1 developments are large scale projects for which significant effects would be expected and comprise developments such as new airports and power stations. The proposed development is not of a type listed in Schedule 1.

Schedule 2 Projects

3.4 EIA is discretionary for projects listed in Schedule 2. If the development proposed is of a type listed in Schedule 2 then it may be classified as EIA development depending on the location of the development (i.e. if it is within a sensitive area) and/or whether it meets any of the relevant thresholds or criteria in Column 2.

3.5 Sensitive Areas are defined in the EIA Regulations as:

- Sites of Special Scientific Interest and European Sites;
- National Parks, the Broads, and Areas of Outstanding Natural Beauty;
- World Heritage Sites and Scheduled Monuments.

3.6 In certain cases, local designations which are not included in the definition of sensitive areas, but which are nonetheless environmentally sensitive, may also be relevant in determining

whether an assessment is required. Furthermore, in considering the sensitivity of a particular location, regard should also be had to whether any national or internationally agreed environmental standards (e.g. air quality) are already being approached or exceeded.

- 3.7 The proposed development falls within category 10 of Schedule 2, 'Infrastructure Projects', sub-section (b) 'Urban Development Projects'. The site is not located in a sensitive area and therefore the thresholds should be applied. The thresholds for residential developments as set out in Schedule 2 relate to developments that "*includes more than 1 hectare of urban development which is not dwellinghouse development, more than 150 dwellings or the overall area of the development exceeds 5 hectares*". The proposed development is for up to 145 dwellings and the area of development is approximately 0.35ha, which both fall below the thresholds. However, due to the number of developments coming forward in the surrounding area, and the proposed height of the development, this screening assessment has been prepared to determine whether the proposals would be likely to result in significant cumulative effects. To achieve this, Schedule 3 of the EIA Regulations and the PPG need to be considered. Information on these are set out below.

Schedule 3

- 3.8 Schedule 3 of the EIA Regulations sets out selection criteria which relate to specific matters including: the characteristics of the development; the location of the development; and the characteristics of the potential impact. These factors should be taken into account as part of the screening process and are set out below:

Characteristics:

- the size and design of the whole development;
- cumulation with other existing development and/or approved development;
- the use of natural resources, in particular land, soil, water and biodiversity;
- the production of waste;
- pollution and nuisances;
- the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge; and
- the risks to human health (for example, due to water contamination or air pollution).

Location:

- The existing and approved land use;
- the relative abundance, availability, quality and regenerative capacity of natural resources

(including soil, land, water and biodiversity) in the area and its underground; and

- The absorption capacity of the natural environment.

Potential Impact:

- the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);
- the nature of the impact;
- the transboundary nature of the impact;
- the intensity and complexity of the impact;
- the probability of the impact;
- the expected onset, duration, frequency and reversibility of the impact;
- the cumulation of the impact with the impact of other existing and/or approved development; and
- the possibility of effectively reducing the impact.

Consideration of Cumulative Effects

3.9 Schedule 4 of the EIA Regulations requires consideration of a proposed development cumulatively with other existing and/or approved development. Guidance on the consideration of cumulative effects in the EIA screening process is set out in the PPG, which echoes the requirements of the EIA Regulations:

"each application (or request for a screening opinion) should be considered on its own merits. There are occasions where other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development. The local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development."

3.10 Table 1 below, sets out those 'existing and approved' schemes identified in the surrounding area. The five applications in Table 1 have been approved and due to proximity to the site, or relationship to approved development, warrant consideration.

Table 1: Approved Applications

Application	Description	Distance
Approved Applications		
Minavil House, Rosemont Road, Wembley (ref. 16/2629)	Demolition of existing two storey commercial buildings and erection of a mixed used development ranging from ten to 26 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	Approximately 95m to the south-east of the site.

Application	Description	Distance
	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.	
243 Ealing Road, Wembley (ref. 13/0653)	Details pursuant to condition 11 (risk assessment and method statement), 12 (construction method statement), 16 (construction and management statement), 17 (site investigation report), 23 (cycle parking) and 28 (phasing plan) of full planning permission reference 09/2116 dated 30/03/2012 for erection of 7 blocks (1 x 14 storeys, 3 x 11 storeys, 1 x 10 storeys & 2 x 6 storeys) comprising 440 flats and commercial and community space at ground-floor level, the erection of a three-storey detached dwellinghouse, the provision of 219 parking spaces including 30 disabled parking spaces at basement and ground-floor level, associated landscaping and provision of private and public amenity space.	Approximately 180m to the south-east of the site.
245-249 and 253 Ealing Road, Wembley (ref. 16/3606)	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).	Approximately 330m to the south of the site.
Land at 255 Ealing Road, Wembley (ref. 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.	Approximately 340m to the south of the site.
2 Atlip Road, Wembley (ref. 15/2061)	Proposed demolition of existing former retail warehouse building and erection of 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 (as amended).	Approximately 300m south-east of the site.

- 3.11 The Applicant is also aware of the submitted planning application for the proposed development at Alperton House (ref: 18/4199), located approximately 50m to the south of the Site. The proposed development comprises: Demolition of the existing buildings and construction of 4 buildings ranging in height from 14 to 23 storeys, comprising 474 residential units at 1st to 23rd floors (140 x 1-bed, 263 x 2-bed and 71 x 3-bed), mixed commercial use at ground and part 1st floor including a new public house (Use Class A4) retail floorspace (Use Classes A1, A2, and/or A3), workspace (B1b/c), and an office (B1a), together with

associated public realm improvements; soft/hard landscaping; creation of a canal side walkway, new access arrangements, car and cycle parking; servicing, refuse and recycling facilities.

- 3.12 The planning application does not fall within the definition of the PPG, however because of the close proximity to the site and the likelihood of the development coming forward, the scheme warrants consideration.

Planning Practice Guidance

- 3.13 Paragraphs 057 and 058 of PPG provide guidance to help determine whether significant effects are likely. In general, the more environmentally sensitive the location, the lower the threshold will be at which significant effects are likely. Table 2 below sets out indicative criteria and thresholds identified in the PPG along with some of the issues that are most likely to need to be considered in determining the whether a development is likely to be EIA development.

Table 2: Planning Practice Guidance Indicative Screening Criteria

Development type	Indicative criteria and threshold	Key issues to consider
(b) Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas;	Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination. Sites which have not previously been intensively developed: (i) area of the scheme is more than 5 hectares; or (ii) it would provide a total of more than 10,000 m ² of new commercial floorspace; or (iii) the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).	Physical scale of such developments, potential increase in traffic, emissions and noise.

- 3.14 Table 3 sets out a review of all of the above criteria and requirements and specifically addresses the proposed development at the site.

Table 3: Screening Assessment for Development on Land at Bridgewater Road, Alperton.

SCREENING CRITERIA	PROPOSED DEVELOPMENT
1. CHARACTERISTICS OF THE DEVELOPMENT	
(a) Size of the development	
Will the development as a whole be out of scale with the existing environment?	The site is currently developed and comprises a vacant car showroom and a single storey row of industrial units. The proposed development would provide a new building that will consist of up to 145 new residential units and up to 850sqm of commercial floorspace. The surrounding environment comprises a mixture of uses including residential, light industrial,

SCREENING CRITERIA	PROPOSED DEVELOPMENT
	commercial, leisure and community use. In light of this, the development would not be out of context with existing development in the area.
Will the design of the development as a whole fit in with the existing environment?	<p>The height of the proposed development would be up to a maximum of 19 storeys.</p> <p>The current surrounding buildings already comprise high-rise buildings for example, Grand Union Heights, Peppermint Heights, Atlip Road and 185 Ealing Road and a number of planning applications for future high-rise developments in the surrounding area are currently being considered as detailed in Table 2. The future development of Minavil House has a maximum height of 26 storeys, located 95m to the south-east of the site. The proposals are considered to fit in with the existing environment.</p>
Will it lead to further consequential development or works?	No. The proposed development is a discrete proposal and includes all necessary works, including access.
(b) Accumulation with other development	
Are there potential cumulative impacts with other existing development or development not yet begun but for which planning permission exists?	<p>As identified in Table 1, the Applicant is aware of the following 'existing and approved development' within the meaning of PPG and the EIA Regulations:</p> <ul style="list-style-type: none"> • Minavil House (ref.16/2629); • 245-249 and 253 Ealing Road (ref. 16/3606); • 255 Ealing Road (ref. 14/2276); • 243 Ealing Road (ref. 13/0653); and • 2 Atlip Road (ref. 15/2061). <p>As mentioned in paragraph 3.11, the Applicant is aware of a planning application for Alperton House (ref: 18/4199). Even though this application does not fall within the definition of PPG, the close proximity to the site and the likelihood of the scheme coming forward, the scheme warrants consideration.</p>
Should the application for this development be regarded as an integral part of a more substantial project? If so, can related developments which are subject to separate applications proceed independently?	No. As noted above, the proposed development is a discrete project and could proceed independently.
(c) Use of natural resources	
Will construction or operation of the development use natural resources such as land, water, material or energy, especially any resources which are non-renewable or in short supply?	The proposed construction and operational phases of the proposed development will use resources in terms of land, water and energy as would be expected for a primarily residential development.
(d) Production of waste	
Will the development produce wastes during construction or operation or decommissioning?	<p>Construction waste would be reused and recycled where possible.</p> <p>Operational waste would be disposed of in line with LBB requirements and managed in accordance with all applicable legislation.</p>
(e) Pollution and nuisances	
Will the development release any pollutants or any hazardous, toxic or noxious substances to air?	<p>During the construction phase of the proposed development, dust would be generated. Dust generation would be managed in accordance with standard best practice measures, enforced through a CEMP and is not anticipated to generate significant adverse effects.</p> <p>There would be emissions associated with plant and vehicles during the construction phase and from vehicles during the operation of the proposed</p>

SCREENING CRITERIA	PROPOSED DEVELOPMENT
	<p>development. The number of vehicles travelling to and from the site during the operational phase would be associated with the residential dwellings and the future employees that will work within the non-residential element of the site. However, with the limited parking spaces proposed on the site, there would be very little impact from operational traffic. An Air Quality Assessment will also be submitted with the planning application.</p> <p>The proposed development is primarily of residential use which is not associated with hazardous substances or toxic emissions to air. There is not anticipated to be a requirement to store large volumes of hazardous materials. Any such materials would be stored and handled in accordance with relevant legislation.</p>
Is there a potential risk from leachates or escape of wastes or other products/by-products that may constitute a contaminant in the environment?	Appropriate measures, in accordance with all relevant legislation, would be used to prevent accidental spillages of contaminants during the construction or operational phases of the proposed development. The land uses proposed are not highly contaminative and it is not expected that there is a high risk of contaminants being released into the environment.
Will the development cause noise and vibration or release of light, heat, energy or electromagnetic radiation?	<p>The potential exists for noise effects to result from the construction processes associated with the proposed development. These effects will be managed in accordance with best practice measures, implemented through the CEMP and are not anticipated to generate significant adverse effects.</p> <p>Lighting would be designed carefully in accordance with relevant British Standards and Institute of Lighting Professionals (ILP) (2011) Guidance Notes for the Reduction of Obtrusive Light.</p> <p>No electromagnetic radiation, heat or energy releases are expected other than those associated with normal residential development.</p>
Will the development lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?	<p>Hydrocarbons will be used as part of the construction phases of the development. This would involve plant and vehicle fuel and lubricants.</p> <p>Surface water run-off and foul water drainage will be managed on-site during the construction and operational phases. Sustainable drainage would be considered, and appropriate drainage design would be included within the planning application documents including the Flood Risk Assessment (FRA) and Drainage Strategy.</p>
(f) Risk of major accidents and/or disasters, including those caused by climate change and also having regard in particular to substances or technologies used	
Will there be a risk of accidents during construction or operation of the development which would have effects on people or the environment?	During the construction phase, the contractor(s) would implement measures in accordance with Health and Safety legislation/requirements, and best practice to minimise the risks of accidents that would have effects on people or the environment. All such measures would form part of the CEMP. There are no anticipated significant risks of accidents during operation as the proposed development does not involve users dealing with hazardous substances.
Will the development involve use, storage, transport, handling or production of	During the construction phase, certain materials may be present on the site which may be harmful to the

SCREENING CRITERIA	PROPOSED DEVELOPMENT
substances or materials which could be harmful to people or the environment (flora, fauna, water supplies)?	environment. However, it is considered that through the implementation of appropriate environmental control measures in line with the relevant legislation there will be no significant environmental effects. The operational development is not expected to involve the use, transport or production of substances or materials which could be harmful to the environment.
(g) Risks to human health	
What are the risks to human health such as from water contamination or air pollution?	<p>During the construction phase of the proposed development, dust would be generated. However, dust generation would be managed in accordance with standard best practice measures, enforced through a CEMP and is not anticipated to generate adverse effects to human health.</p> <p>Surface water run-off and foul water drainage will be managed on-site during the construction and operational phases, as detailed further in the FRA and Drainage Strategy that will be submitted with the planning application.</p>
Other characteristics	
Potential physical changes (topography, land use, changes in water bodies etc) from construction, operation or decommissioning of the development?	The principal land use will change from light industrial/commercial use to land used for primarily residential purposes and retail and workspace use. There would be changes to the site during the construction phase however these are not expected to involve significant changes in topography etc.
2. LOCATION OF THE DEVELOPMENT	
(a) Existing and approved land use	
Are there existing land uses on or around the location which could be affected by the development, e.g. residential, industry, commerce, recreation, public open space, community facilities, agriculture, forestry, tourism, mining or quarrying?	Currently the site is used for light industry and commercial use. To the south of the site is a further area of predominantly light industrial and commercial use. Further to the south of the site is a mixture of industrial and high density residential development, including Peppermint Heights, Grand Union Heights, 185 Ealing Road and Atlip Road. The proposed residential-led development is not considered likely to affect the surrounding areas, as these comprise similar land uses.
Is the development located in a previously undeveloped area where there will be loss of greenfield land?	The site is brownfield that has been previously developed. There will be no loss of greenfield land.
(b) Relative abundance, availability, quality and regenerative capacity of natural resources in the area and its underground*	
<p>Are there any areas on or around the location which contain important, high quality or scarce resources which could be affected by the development?</p> <ul style="list-style-type: none"> • soil • land • groundwater resources • surface waters • biodiversity • forestry • agriculture • fisheries • tourism • minerals 	<p>The Grand Union Canal is located approximately 150m south of the site. The canal is included in the Blue Ribbon Network which seeks to protect and promote the River Thames and its adjoining tributaries, canal and drainage systems.</p> <p>None of the other features are present in or adjacent to the site.</p>
(c) Absorption capacity of the natural environment**	
Are there any areas on or around the location which are protected under international or national or local legislation for their	The site is not located within any sensitive area, within the meaning of the EIA regulations. There are no statutory designations within the site either i.e. there are no Scheduled Monuments, Areas of

SCREENING CRITERIA	PROPOSED DEVELOPMENT
<p>ecological, landscape, cultural or other value, which could be affected by the development?</p>	<p>Outstanding Natural Beauty (AONBs), Sites of Special Scientific Interest (SSSIs), National Parks, World Heritage Sites, Special Areas of Conservation, Special Protection Areas (SPAs), or Ramsar Sites.</p> <p>The nearest 'Sensitive Area', as defined by the EIA Regulations is the Scheduled Monument of the medieval moated site, 454m south-west of Sudbury Golf Club House which is located approximately 1km north-west of the site. The Iron Age settlement on Horsenden Hill, Greenford is a Scheduled Monument located approximately 1.6km north-west of the site.</p> <p>Fox Wood Local Nature Reserve (LNR) is located approximately 1.5km south of the site. Perivale Wood LNR is located approximately 1.8km west of the site.</p> <p>Walpole Park (Grade II) is the closest Registered Park and Garden to the site, located approximately 3.3km south of the site.</p> <p>The closest Listed Building is the Sudbury Stone located approximately 1.1km north-west of the site. There are a further 13 Grade II Listed Buildings within 1.5km of the site.</p> <p>It is considered that the above features would not be directly or indirectly affected by the proposed development due to their separation from the site by distance from the proposals and by existing built form and topography.</p>
<p>Are there any other areas on or around the location which are important or sensitive for reasons of:</p> <ul style="list-style-type: none"> • Wetlands, riparian areas, river mouths; • coastal zones and the marine environment; • mountains and forest areas; • nature reserves and parks; • European sites and other areas classified or protected under national legislation; • Areas in which there has already been a failure to meet the environmental quality standards laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure; • Densely populated areas; • Landscapes and sites of historical, cultural or archaeological significance. 	<p>The Grand Union Canal is located approximately 150m south of the site. The canal is included in the Blue Ribbon Network which seeks to protect and promote the River Thames and its adjoining tributaries, canal and drainage systems. The proposals will not physically alter the Grand Union Canal. A FRA and Drainage Strategy will be submitted with the planning application.</p> <p>The site is located within the Brent Air Quality Management Area (AQMA). The pollutants declared are Particulate Matter (PM₁₀) and Nitrogen Dioxide (NO₂). A Transport Assessment which will include a Travel Plan will be submitted with the planning application. An Air Quality Assessment will also be submitted in support of the planning application.</p> <p>The site is located in LBB and forms part of Greater London. Being an urban area, Alperton is already densely populated and is therefore not sensitive to a new primarily residential development.</p>
<p>Are there any areas on or around the location which are used by protected, important or sensitive species of fauna or flora e.g. for breeding, nesting, foraging, resting, overwintering, migration, which could be affected?</p>	<p>As a previously developed site that is currently in commercial and light industrial use, it is anticipated that the site has low ecological value. A Biodiversity Survey and Report will be submitted with the planning application.</p>
<p>Are there any inland, coastal, marine or underground waters on or around the location which could be affected?</p>	<p>According to the Gov.UK website, the site is located within Flood zone 1 (low probability of flooding). The Grand Union Canal is located approximately 150m south of the site. However, the development will not alter this water body. A FRA and Drainage Strategy</p>

SCREENING CRITERIA	PROPOSED DEVELOPMENT
	<p>will be submitted in support of the planning application.</p> <p>The site is not located within or close to a groundwater Source Protection Zone.</p> <p>No other water bodies would be expected to be significantly affected by the proposed development.</p>
Are there any groundwater source protection zones or areas that contribute to the recharge of groundwater resources?	As stated above, the site is not located within or adjacent to a groundwater Source Protection Zone.
Are there any areas or features of high landscape or scenic value on or around the location which could be affected?	<p>The site is not located within an AONB. The closest AONB is located at significant distance from the site: the Chilterns AONB is located approximately 19km north-west of the site. This distance is such that the proposed development would not directly affect the AONB.</p> <p>There are no other areas or features of high landscape or scenic value, which would be affected by the proposed development.</p>
Are there any routes or facilities on or around the location which are used by the public for access to recreation or other facilities, which could be affected?	<p>Bridgewater Road (A4005) is located adjacent to the south-western boundary of the site.</p> <p>Ealing Road (A4089) is located approximately 100m to the south-east of the site.</p>
Are there any transport routes on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected?	The construction phases of the proposed development would involve changes to traffic movements (e.g. use of HGVs). There is likely to be an increased number of vehicles using the local road network once the proposed development is operational. Alperton Station is located approximately 80m east of the site, which provides good connections and will help facilitate the traffic movements associated with the proposed development. A Transport Assessment which will include a Travel Plan will be submitted in support of the planning application.
Is the development in a location where it is likely to be highly visible to many people?	<p>The proposed development is located approximately 50-100m north of an area with other established and proposed high-rise buildings as detailed in Table 1. The future development of Minavil House will comprise a building of 26 storeys in height, while a planning application has been submitted for Alperton House for development up to 23 storeys. These are higher than the proposed development of up to 19 storeys.</p> <p>The potential for local views of the site exists from adjacent and nearby roads and public rights of way to the north, and, on completion, will be visible to residents and employers of the consented development immediately surrounding the site. However, the proposed development will not be out of context with the present and future development that will be coming forward in this area. A Townscape and Visual Impact Assessment will be submitted with the planning application which will address local and, where appropriate, long distance views.</p>
Are there any areas or features of historic or cultural importance on or around the location which could be affected?	<p>No features are present within the site.</p> <p>The closest Scheduled Monument is the medieval moated site, 454m south-west of Sudbury Golf Club House which is located approximately 1km north-west of the site. The Iron Age settlement on Horsenden</p>

SCREENING CRITERIA	PROPOSED DEVELOPMENT
	<p>Hill, Greenford is a Scheduled Monument is located approximately 1.6km north-west of the site.</p> <p>The closest Listed Building is the Sudbury Stone located approximately 1.1km north-west of the site. There are a further 13 Grade II Listed Buildings located within 1.5km of the site.</p> <p>The site is not located within a conservation area.</p> <p>It is expected therefore that no features of historic importance will be significantly affected by the proposed development due to the distance and existing development that separates the features from the site.</p>
<p>Are there any areas on or around the location which are densely populated or built up, which could be affected?</p>	<p>According to the 2011 Census, the LBB has a population of 311,215.</p> <p>Noise from the development is likely to arise during the construction stage from construction plant however this would be managed in accordance with standard procedures. On completion of the proposed development, the main source of noise would be from traffic from residents and users of the proposed development however this will be small scale and where necessary will be addressed at the detailed design stage to mitigate any potential effects. A Noise & Vibration Assessment will accompany the planning application.</p> <p>At a maximum height of up to 19 storeys, the development has potential to affect the wind microclimate of the area. The height of these buildings has the potential to obstruct regular wind patterns and may have an effect on increasing local wind gusts in the area and hence impact the dense population in the area. However, Alperton is an existing urban and residential area that is already subject to high-rise buildings, thus significant effects are not anticipated. A Microclimate Assessment will be submitted with the planning application.</p>
<p>Are there any areas on or around the location which are already subject to pollution or environmental damage e.g. where existing legal environmental standards are exceeded, which could be affected?</p>	<p>The site is located within the Brent AQMA. The Pollutants declared are Particulate Matter (PM₁₀) and Nitrogen Dioxide (NO₂). A Transport Assessment which will include a Travel Plan will be submitted with the planning application. An Air Quality Assessment will also be submitted in support of the planning application.</p> <p>According to the data.gov.uk maps, the site does not record any historic landfill within the site. However, the site has been previously developed and it currently comprises light industrial use. A Land Contamination Assessment will be submitted with the planning application.</p>
<p>Is the location of the development susceptible to earthquakes, subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions e.g. temperature inversions, fogs, severe winds, which could cause the development to present environmental problems?</p>	<p>The site is located within Flood zone 1 (low probability of flooding). The southern boundary of the site is adjacent to the Grand Union Canal which is included in the Blue Ribbon Network. A FRA and Drainage Strategy will be submitted with the planning application.</p> <p>The site is not located within a groundwater SPZ.</p>

SCREENING CRITERIA	PROPOSED DEVELOPMENT
	<p>The site is located within the Brent AQMA. The Pollutants declared are Particulate Matter (PM₁₀) and Nitrogen Dioxide (NO₂). A Transport Assessment which will include a Travel Plan and an Air Quality Assessment will be submitted with the planning application.</p> <p>The site is not considered susceptible to any other hazards.</p>
CHARACTERISTICS OF THE POTENTIAL IMPACT	
(a) Extent and nature of the impact	
Will the effect extend over a large area?	No. This is confined to the site (approximately 0.35ha) and the land immediately adjacent.
Will many people be affected?	<p>The residents and employees adjacent to the site will be affected by the proposed development during the construction phase. However, this would not be significant following implementation of best working practices through the CEMP.</p> <p>It is considered that people will not be affected significantly once the proposed development is operational.</p>
What will be the nature of the impact?	Long-term visual impact in the immediate surrounding area; increase in HGV traffic movements during and noise during site construction; minor impact upon air quality from additional traffic movements.
(b) Transboundary nature of the impact	
Will there be any potential for transboundary impact? (n.b. Development which has a significant effect on the environment in another Member State is likely to be very rare. It is for the Secretary of State to check Environmental Statements to decide whether there is likely to be such an effect in each case).	No.
(c) Magnitude and complexity of the impact	
Will there be a large change in environmental conditions?	No.
Will the effect be unusual in the area or particularly complex?	No.
Will many receptors other than people (fauna and flora, businesses, facilities) be affected?	As a previously developed site, this is considered to be unlikely.
Will valuable or scarce features or resources be affected?	No.
Is there a risk that environmental standards will be breached?	No.
Is there a risk that protected sites, areas, and features will be affected?	No.
(d) Probability of the impact	
Is there a high probability of the effect occurring?	The effects of the proposed development can be clearly established and the probability of any effects determined with reasonably confidence.
Is there a low probability of a potentially highly significant effect?	As above.
(e) Expected onset, Duration, frequency and reversibility of the impact	
What will result in the onset of the impact?	Development will commence following the discharge of pre-commencement conditions attached to the planning permission and the issue of any environmental permitting. Works will be suitably limited during sensitive times.

SCREENING CRITERIA	PROPOSED DEVELOPMENT
Will the effect continue for a long time?	Construction effects would be short term in duration and the operational effects would be long term.
Will the effect be permanent rather than temporary?	Construction effects would be temporary and the operational effects would be permanent.
Will the impact be continuous rather than intermittent?	Construction – intermittent Operation – continuous
If intermittent, will it be frequent rather than rare?	Frequent.
Will the impact be irreversible?	Construction – Yes Operation - No
Will it be difficult to avoid or reduce or repair or compensate for the effect?	No.
(f) Possibility of effectively reducing the impact	
What is the possibility of the likely impacts arising from the Proposed Development being effectively reduced?	Whilst it is not considered that significant effects would be likely, mitigation measures would be considered to ensure that any impacts arising from the proposed development would be reduced. This includes best practice measures during the construction phase, such as through a CEMP.

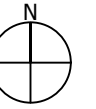
4 CONCLUSION

- 4.1 The screening assessment has considered whether the proposed development of up to 145 residential units and up to 850sqm of commercial floorspace on land at Bridgewater Road, Alperton would result in likely significant effects on the environment.
- 4.2 The proposed development falls within Schedule 2, 10 (b) of the EIA Regulations, as an urban development project. The site is not located within a sensitive area as defined by the EIA Regulations, and falls below the indicative criteria and screening thresholds at less than 5 hectares in area and less than 150 dwellings. However, due to the number of developments coming forward in the surrounding area (see Table 1), this screening assessment has been prepared to determine whether the proposed development would be likely to result in significant cumulative effects.
- 4.3 With regard to the indicative criteria and thresholds identified in the PPG (set out in Table 2 above) it is considered that the proposals when considered cumulatively with other proposed and permitted development would exceed the 1,000 dwelling threshold but falls under the 10,000 sqm of commercial floorspace threshold. However, the proposed development would be in keeping with the current nature and scale of the surrounding development and would not result in significant effects in an already heavily urbanised area and with permitted and proposed tall buildings in the surrounding area.
- 4.4 It is considered that the principal environmental effects will relate to the height of the proposed buildings, construction and operational increases in traffic movements and associated noise and air quality emissions, although as set out in Table 3 above, these effects could be managed in accordance with standard methods, including the implementation of a CEMP.
- 4.5 In summary, the screening assessment has identified that significant effects on the environment are not considered likely. Even though the proposals would be tall when considered cumulatively with other future developments, the location of the Site has good access and is within a densely populated area with other high-rise buildings. The effects that may arise could be appropriately managed in accordance with standard methods. The proposed development is therefore not considered to be formal EIA development as defined by the EIA Regulations.
- 4.6 The planning application will be supported by a suite of environmental reports, including:
- Transport Assessment and Framework Travel Plan;

- Sustainability Statement;
- Landscape Strategy;
- Townscape and Visual Impact Assessment;
- Flood Risk Assessment;
- Drainage Strategy;
- Air Quality Assessment (inc Air Quality Neutral Assessment);
- Noise and Vibration Assessment;
- Land Contamination Assessment;
- Tree Survey and Arboricultural Impact Assessment;
- Biodiversity Survey and Report;
- Daylight and Sunlight Assessment;
- Draft Construction Management Plan; and
- Wind Assessment.

APPENDIX 1

SITE LOCATION PLAN



Project
**Bridgewater Road
 Alperton**

Drawing Title
**Site Plan
 Boundary Plan**

Date	Scale	Drawn by	Check by
26.03.18	1:500@A3	AB	PJ

Project No	Drawing No	Revision
28820	A-E10-006	-



Planning • Master Planning & Urban Design • Architecture •
 Landscape Planning & Design • Environmental Planning • Graphic
 Communication • Public Engagement • Development Economics

bartonwillmore.co.uk



Offices at Birmingham Bristol Cambridge Cardiff Ebbsfleet Edinburgh
 Glasgow Leeds London Manchester Newcastle Reading Southampton

ENCLOSURE 2

LBB ADOPTED EIA SCREENING OPINION – APRIL 2019



Brent Civic Centre
Engineer's Way
Wembley
Middlesex HA9 0FJ

TEL 020 8937 5230

FAX 020 8937 5207

EMAIL paul.lewin@brent.gov.uk

WEB www.brent.gov.uk/localplan

10th April 2019

Dear Sir,

**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 the demolition of all the existing buildings on site, and the erection of three blocks (maximum height 104.310m AOD – indicatively 19 storeys) that will consist of up to 145 residential units, up to 850 sq.m of commercial floorspace, associated parking, and vehicular access and circulation.

Site: Land at 2 Bridgewater Road, Alperton, HA0 1AJ.

I write in connection to your screening request submitted on 4th April 2019. 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.

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 Environmental Impact Assessment is required for a proposed development of the demolition of all the existing buildings on site, and the erection of three blocks (maximum height 104.310m AOD – indicatively 19 storeys) that will consist of up to 145 residential units, up to 850 sq.m of commercial floorspace, associated parking, and vehicular access and circulation.

Site – Land at 2 Bridgewater Road, Alperton, HA0 1AJ.

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

Barton Willmore have requested a screening opinion from the London Borough of Brent (the Council) on 4th April 2019. Associated with this request details of the site boundary, proposed development and an initial assessment of the potential impacts of the proposed development were referred to which had previously been submitted for a screening opinion for the same site, but which identified a slightly lower maximum height.

The Existing Site and Surrounding Area

The development site fronts onto Bridgewater Road to the south, the Piccadilly railway line to the north, a bus depot to the east and low density industrial uses to the west. The site covers an area of approximately 0.35 ha, currently comprising a vacant car showroom and single storey industrial units. These are predominantly surrounded by hardstanding used for car parking with some incidental flora surrounding the site. The railway tracks to the north are designated as a Wildlife Corridor, and One Tree Hill to the north west is a Locally Listed Park. Alperton Station to the north east is a Locally Listed Heritage Asset.

The site is within an area that has a mix of uses, formerly having been principally industrial/commercial in nature but changing to one that is anticipated through the Brent Development Plan to become predominantly residential in character with associated commercial uses. Adjacent to the railway tracks to the north is the Alperton Community School and its associated sports facilities. The bus depot to the east is adjacent to Ealing Road, immediately opposite which will be the new Minavil House canal side development which will rise to 26 storeys. To the south are two storey residential terrace homes, Manor Farm Road which extends to Perivale and 1 to 6 storey commercial buildings including Alperton House. Adjacent to the commercial land to the north are 2 storey residential terrace and semi-detached homes. The Grand Union Canal runs to the south east of the site and it facilitates the moorings of houseboats. Ealing Road is a heavily trafficked road, with the adjacent junction with Bridgewater Road being busy.

The site is designated as a Locally Significant Industrial Site (LSIS) in the Brent Local Plan. It constitutes part of the northern section of the site allocation Alperton Industrial Sites (BSWSA1) as outlined in the draft Local Plan preferred options document issued for consultation in November 2018. This proposes that development within Alperton is set to focus around Alperton Station and the Grand Union Canal to develop a sustainable and attractive mixed use community.

The Size and Design of the Proposed Development

The proposed development of the demolition of all the existing buildings on site, and the erection of three blocks (maximum height 104.310m AOD – indicatively 19 storeys) that will consist of up to 145 residential units, up to 850 sq.m of commercial floorspace, associated parking, and vehicular access and circulation.

Information Provided in Support of the Request for a Screening Opinion

The request for screening opinion has been submitted with a supporting statement setting out an analysis of the likely environment effects of the proposal. This information has been utilised, as necessary, to inform this EIA Screening Opinion.

Previous History

In 2014 the site had an application for 'construction of a 5 to 10 storey building comprising 46 residential units and associated hard and soft landscaping, amenity spaces and basement parking', which was withdrawn. The existing car wash also had a change of use permission from its previous use as a car sales business. There are currently no applications on the site which conflict with this proposal.

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:

18/4199 Demolition of the existing buildings and construction of 4 buildings ranging in height from 14 to 23 storeys, comprising 474 residential units at 1st to 23rd floors (140 x 1-bed, 263 x 2-bed and 71 x 3-bed), mixed commercial use at ground and part 1st floor including a new public house (Use Class A4) retail floorspace (Use Classes A1, A2, and/or A3), workspace (B1b/c), and an office (B1a), together with associated public realm improvements; soft/hard landscaping; creation of a canal side walkway, new access arrangements, car and cycle parking; servicing, refuse and recycling facilities. To be determined by Planning Committee on 10th April 2019.

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. Granted 28th September 2019.

17/1104 All Units, 253A Ealing Road, Wembley, HA0 1ET Demolition of the existing buildings on the site and the erection of 20 residential units comprising four 2 storey terraced houses (4 x 2bed houses) and two 4 storey residential blocks providing 16 flats (8 x 2bed and 8 x 3bed units), together with 5 associated car parking spaces, cycle storage, landscaping and access. Granted 21st February 2019.

16/4478 - Abbey Wharf, Delta Centre and all of 152 Mount Pleasant Demolition of existing buildings 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).

16/3606 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) . Minded to approve by Planning Committee 9th August 2017 subject to signing of a S106 obligation. Awaiting conclusion of S106 signing.

16/2629 Minavil House, Rosemont Road, Wembley. Full planning permission for 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 sq. m 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. Granted 21st January 2019. Start on site expected to be imminent.

14/2276 Land at 255, Ealing Road, Wembley, HA0 1ET Construction of 3 to 9-storey building comprising 125 residential units and 277 sq. m 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. Granted 11th December 2014. Under construction.

Other Environmental Assessments

Regulation 5(5)(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 (2015). 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.

Masterplans

The Alperton Growth Area is subject to an adopted Supplementary Planning Document: Alperton Masterplan August 2011. This was not subject to separate SEA, as this was addressed in the Core Strategy and Site Allocations DPD SEA.

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 145 residential units and up to 850 sq.m of commercial floorspace. This proposal therefore falls outside of the criteria which may require EIA, however, the applicant has requested a screening opinion due to the scale of

development within the local vicinity, and the proposed height of the development, with particular reference toward potential for cumulative effects.

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 includes 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, and therefore even small increases in emissions can lead to adverse effects. The AQMA has been declared for exceedance of the annual mean national objective for nitrogen dioxide (NO₂) and the 24 hour mean national objective for particulate matter (PM₁₀).

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

Documentation Accompanying the Planning Application: *It is anticipated that an Air Quality Assessment, as informed by a Transport Assessment will be submitted with the application.*

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. Taking account of these practices the effect of dust soiling and PM₁₀ is likely to be reduced to negligible with the implementation of appropriate mitigation measures. These may include: No idling vehicles; Erect solid screens or barriers around dusty activities or the Site's boundary; Loads entering and exiting the Site are covered; Where practicable use mains or battery powered generators over fuel burning; Other dust suppression measures e.g. damping down with water; and all constructions vehicles and equipment to comply with relevant EU stage ratings. 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 effects would be significant.

Operation

Air quality emissions during operation will be from new traffic generation, heating systems and potentially operation of the businesses related to the commercial floorspace proposed. 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 relatively heavy trafficked road and a bus depot. The Council is likely to seek technical reports that show how an air quality neutral development can be achieved.

As the site is primarily within a PTAL 4 area, consistent with recent adjacent residential developments it is likely that limited on site car parking will be provided on site and this will principally be focused on disabled parking provision. Lower levels of provision in relation to commercial uses are also anticipated. This reflects the site's relatively accessible location in terms of travel by foot, cycle and public transport. Parking controls are likely to be increased in the surrounding area to deal with potential displacement off-site. This, along with measures to support walking, cycling and public transport is likely to reduce private car use. Taking this into account the level of net traffic generation resulting from this development is likely to be negligible. As such emissions from vehicle movements will be minimal, and therefore effects are not considered to be significant.

It is not clear how the development will be heated, it is assumed that this will be by gas powered boilers. Any such system is likely to adequately disperse fumes through a suitably designed flue system and therefore the impact on local air quality will be negligible. As such significant effects are not considered to be likely. Given the proximity of commercial to residential it is assumed that occupiers are unlikely to undertake activities that will generate potentially significant impacts on air quality. Such uses would be subject to environmental health legislation.

Consideration also needs to be given to the potential effects on the new internal receptors given the location for the proposed development adjacent to in part to a relatively heavily trafficked road, the close proximity of the large bus depot and the site being within an AQMA.

Mitigation

The Council is likely to seek an air quality neutral development. During the construction phase a CEMP should be implemented which implements suitable measures to reduce the impact of dust and emissions. This can be secured via a planning condition.

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. Continuous visual assessment of the site should be undertaken and a complaints log maintained in order to determine the origin of a particular dust nuisance.

For the operational phase suitable mitigation to be secured through a planning condition to ensure that new internal receptors are adequately protected.

In addition suitable conditions associated with the Travel Assessment including Travel Plan and measures to reduce reliance on the private car, for example through provision of sufficient cycle parking and potential S106 contributions to implementing a wider controlled parking zone will ensure reductions in impact through vehicle movements.

Local Heritage

Documentation Accompanying the Planning Application: *A design and access statement will identify the extent of local heritage and cultural assets and how the design of the development has responded to these. In addition a views assessment will identify the extent to which the development impacts on skyline and protected views.*

The closest features is the Scheduled Monument at the medieval moated site, 454m south-west of Sudbury Golf Club House which is located approximately 1km north-west of the site. The Iron Age settlement on Horsenden Hill, Greenford is a Scheduled Monument located 1.7km north-west of the site. The Site does not lie within or near a Conservation Area or an Archaeological Priority Area. The closest Listed Building is the Sudbury Stone located

approximately 1.1km north-west of the site. There are a further 13 Grade II Listed Buildings within 1.5km of the site. Roundwood Park (Graded II) is the closest Registered Park and Garden to the site, located 4km east. The Willesden Jewish Cemetery Registered Park and Garden is located 4.1km north-east of the site and is also Graded II.

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 impact of the scale and height of the proposed buildings through the design and access statement and views assessment will allow sufficient clarity of impact on the setting of features of historic or cultural importance. The separation distance between the site and designated heritage assets means that significant impacts are not anticipated.

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 and cultural impacts.

Climatic Factors

Documentation Accompanying the Planning Application: *An Energy Report should be submitted with the planning application.*

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 of plant to prevent plant running when not in use.

The s106 will need to be worded to ensure that any required carbon reduction off-set payments are secured.

Taking account of the above the Council does not consider that the environmental impacts related to climate change are significant enough to warrant EIA.

Contaminated Land

Documentation Accompanying the Planning Application: *A Phase 1 ground conditions survey should be submitted with the application. This will assess the potential effects of the proposed development and if necessary the need for further ground investigations to support a remediation strategy report with mitigation measures to deal with any residual effects.*

Parts of the site are within a historically industrial area and has been used for industrial purposes for some time. As such there is the potential for sources of contamination related to its and the surrounding land uses.

Construction

During construction there is considered to be a low likelihood of fuel leakages/ spills from construction vehicles. A CEMP would be implemented to manage potential effects. In addition there is the risk of exposure to contaminated materials and opening up pathways to underlying substrata. Standard mitigation measures will be required during the construction of the proposed development, to ensure that the works are undertaken in an appropriate manner. These should be secured through conditions in agreement with the Council's Contaminated Land Officer.

With the implementation of these mitigation measures, no significant effects are considered likely.

Operation

With the implementation of any required impact avoidance measures as part of the construction phase, no significant effects are anticipated at operation.

Mitigation

Standard construction mitigation measures should be secured through the CEMP and through conditions in agreement with the Council's Contaminated Land Officer.

Taking into account the above the contamination issues are not so significant as to warrant and EIA.

Daylight, Sunlight and Overshadowing

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

Documentation Accompanying the Planning Application: *A Daylight and Sunlight Report should be submitted with the application.*

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 building.

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

The erection of the new building will generate some adverse effects as it is built out. The construction effects will however be no greater than the completed, operational development, which are not considered to be significant.

Operation

The operation of the proposed development will introduce buildings up to 19 storeys onto the site. Due to the proximity of nearby sensitive receptors and the height there is the potential for the proposed development to affect surrounding receptors. Some properties may be adversely affected by the proposed development, however given the number of receptors and the site's urban location, the effects are not considered to be significant.

With respect to onsite receptors the building will sit within a context where tall buildings are prevalent in close proximity which could impact on sunlight and daylight available to the development. Whilst this might impact on some receptors significant effects are not considered to be likely.

Mitigation

No discipline specific mitigation has been relied upon for the EIA Screening Opinion.

Taking account of the above it is considered that the environmental impacts in relation to daylight, sunlight and overshadowing would not be so significant to warrant EIA.

Biodiversity (including flora and fauna)

The site contains no areas of statutory nature conservation and there are no such sites within the immediate vicinity of the Site. There are no SPA, SAC or Ramsar designations within 5km of the Site. The nearest Local Nature Reserve (LNR) is Fox Wood located 1.3km south of the site. Perivale Wood LNR is located 1.7km west of the site. The closest Special Area of Conservation (SAC) is Richmond Park, located 9km south of the site. The closest National Nature Reserve is Ruislip Woods which is located 9.3km north-west of the site. The nearest AONB is the Chilterns AONB, located 19km north-west of the site. The South West London Waterbodies is the closest Ramsar Site and SPA to the site, located 15.5km south-west.

There are no environmental pathways such as water courses through which the Proposal could adversely affect these protected areas. It is not considered that the proposed development will have a significant effect on the integrity of statutory or non-statutory nature conservation designations or protected species and the potential for conservation requirements and objectives would not be diminished.

The development site appears to have limited on site ecological assets, essentially in terms of green infrastructure predominantly consisting some incidental flora on its perimeter. It is however adjacent to the railway tracks which is designated as a Wildlife Corridor, and within close proximity to One Tree Hill Park which is locally listed.

Construction

A range of standard mitigation measures may be required to reduce potential adverse impacts on biodiversity, such as timing of demolition/ construction activities, relocation of bats and controls on lighting.

Operation

There is the potential for the proposed development to beneficially contribute to biodiversity of the local area through the implementation of ecological enhancement measures e.g. inclusion of bat roosting opportunities, bird boxes, green roofs and a wider range of green infrastructure on site that encourages bio-diversity. Whilst this is considered to be beneficial, this is not considered to be significant.

Mitigation

Suitable conditions should be in place to ensure potential adverse impacts on any existing protected species are minimised prior to and during works on site, as well as incorporation of suitable features to encourage bio-diversity resources as part of the development.

Taking account of the above no significant environmental effects should arise which would require the need for an EIA.

Flood Risk

Documentation Accompanying the Planning Application: *The site is located within Flood Zone 1, and is therefore considered to be at low risk to flooding. The site is less than 1.0 hectare and therefore does not require a FRA.*

Construction

Given that the site is outside of Flood Zone 3, in the construction process there is considered to be limited risk property and people.

Operation

The proposed development site is located in an area at low risk of 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

Mitigation

Implementation and management of surface water run-off should be secured through a planning condition.

Taking account of these matters it is considered that the development will not have significant effects that warrant the need for 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 brownfield land to provide commercial space and residential dwellings. This is not considered to generate any significant effects. No discipline 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. climate change, 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 will need to be submitted with the application. Background noise levels on the site, and in this part of the Borough, are principally characterised by road traffic noise and that from the adjacent train tracks, with moderate levels of noise from the adjacent light industrial uses possible.*

Construction

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

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. In the context of traffic movements around the site, the level of construction vehicle movements will not be exceptional. No significant effects are therefore anticipated.

Operation

With the exception of disabled parking, it is likely limited general car parking will be provided as part of the development scheme. There are likely to be deliveries to residents and commercial properties as well as waste removal, but in an urban context the impacts will be limited. As such, there is not considered to be any significant effects from traffic noise.

The proposed commercial and residential use is not considered to be inherently noisy. Some noise may be generated from the operation of mechanical plant and building services, 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 effects.

There is the potential for new residents to be affected by adverse noise due to the site's location. The Noise Assessment will consider how new residents can be protected through the appropriate design of the proposed development. The proposed development can therefore be designed with consideration to the location of the development and the potential noise implications – secured through planning conditions.

No significant effects are therefore anticipated.

Mitigation

Adherence to the CEMP should be secured through a planning condition, the CEMP will include standard mitigation measures to reduce noise emissions. Plant noise should be controlled to local and national guidelines using a planning condition.

Suitable mitigation will be required to be included within the design of the proposed development to ensure that new internal receptors are adequately protected. This might be through specifications on glazing, acoustic trickle vents, air bricks or mechanical ventilators, in order to reduce noise ingress but provide adequate ventilation to the standards.

Taking account of these matters it is considered that the development will not have significant effects that warrant the need for EIA.

Socio-Economic (including population)

Documentation Accompanying the Planning Application: *The planning statement might give an indication of current land use and number of jobs within the site and compare this with what is proposed.*

Construction

The proposed development would create benefits to local employment though providing temporary employment during construction. This is considered to be beneficial, but not significant.

Operation

The proposed development would create benefits to local employment though providing permanent employment once operational. In addition approximately 1 in 12 people work from home, so the development will provide space for occupants to do this. The development will provide housing to meet the borough's identified needs, including affordable housing. This is considered beneficial but not significant.

The development will increase demand for local social infrastructure. Community Infrastructure Levy (CIL) payments will be sought to offset the effects of the development. These financial contributions will mitigate adverse effects, so that significant effects are unlikely.

Mitigation

Financial contributions through CIL will be sought to mitigate the effects of increased population/ users.

Taking account of these matters it is considered that the development will not have significant effects that warrant the need for 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, given the scale of the development and the length of the demolition/construction phase, effects are not considered to be significant.

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

The implementation of a CEMP during the construction phase will ensure that standard mitigation measures are implemented.

Telecommunications

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

Documentation Accompanying the Planning Application: A Townscape/ Visual Impact Analysis will identify the extent to which the development impacts on the skyline.

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 height of the proposed development will be 19 storeys (104.310 metres AOD) and therefore a greater scale than that previously on site. The context within which it sits however currently includes tall buildings in the near vicinity. To the south is currently Peppermint Heights a 15 storey building. The Minavil House site to the west has a proposed development of 26 storeys. The development is likely to reduce in scale in those areas where it is anticipated that existing development will remain, or where a lower scale of development is likely to be considered appropriate in the future. EIA submitted with the Minavil House application found no significant adverse impacts related to the height of that development on townscape and visual impact. As such, the Council considers that although there is the potential for the proposed development to lead to some adverse effects on

townscape and views, given the scale of the development and the urban nature of its location, significant effects are not considered likely.

Mitigation

During construction, ensure the erection and maintenance of hoarding. Design, height and massing to reduce potential for adverse impact.

Taking account of these matters it is considered that the development will not have significant environmental effects that warrant the need for EIA.

Traffic and Transport

Documentation Accompanying the Planning Application: *A Transport Assessment will be submitted with the planning application. The site is located within an area with a public transport accessibility level (PTAL) primarily of 4. As such it has good public transport accessibility (Alperton station and numerous local bus services within 150 metres) and is in an area where the Council will seek to limit on site car parking provision.*

Construction

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

The Transport Assessment will set out how the site would be serviced when operational, which is consistent with an approach agreed with the local highway authority. Due to the proposed limited on site car parking provision operational traffic effects of the proposals are likely to be negligible when placed within the context of the site's existing use. Increased numbers of movements related to deliveries could generate additional traffic over current levels. However, given the scale of the development, these effects are not considered to be significant. The lack of on-site car parking and lack of residents' controlled parking zone in the area will mean that suitable controls on residents potential to own/ park cars on site and in the vicinity will be expected, this is likely to include restrictions within property leases as well as financial payments towards a local parking permit scheme, which will help to mitigate any adverse effects.

Mitigation

A CLP should be secured that includes standard mitigation measures to control transport movements.

Controls on occupants and financial payments should be sought to offset operational effects.

As such no significant environment effects are anticipated to require EIA.

Waste

Documentation Accompanying the Planning Application: *A CEMP will be sought as part of the planning process to deal with demolition and construction waste matters. A Waste Management Strategy or similar type of analysis of within the planning statement of how the development will adequately cater for the storage and collection of domestic and commercial waste during its operation will be sought.*

Construction

The site will generate waste, principally building materials during the demolition and construction stages. 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. The implementation of standard impact avoidance measures will reduce waste from construction activities, which can be secured through the CEMP. No significant effects are therefore anticipated.

Operation

Separate solutions will be provided for both the commercial and residential elements of the development. 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 with reference to the 2015 Brent Council guidance. 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. No significant effects are anticipated.

Mitigation

Adherence to the CEMP which will include standard mitigation measures should be secured through a planning condition for construction phase, as well as one that seeks to ensure sufficient space and practises to ensure adequate measures for waste management are in place prior to and during occupation.

Water Quality (hydromorphological changes, quantity and quality)

Documentation Accompanying the Planning Application: *This matter will be addressed in the Contaminated Study and the CEMP that will be required as part of the application/permission process.*

The site has historic industrial use with potential for various compounds that could adversely affect water quality such as hydrocarbons within the ground if disturbed. The site however, is not located within or close to a groundwater Source Protection Zone.

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. In addition the potential of

contamination on site could result in pathways either above or below ground being created that lead to watercourses, for example through piled foundations. This will require measures to avoid such potential. 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. There is the potential for pollutants originating from motor vehicles to enter the surface water and ground water systems. Such risk can be mitigated through the inclusion of pollution control measures in surface water drainage systems, which can be secured by condition. 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 Contaminated Land Report will identify if and where contamination is present and measures required to ensure that any construction activity does not increase risk to water quality will be secured through planning condition. The implementation and management of SuDS and associated pollution control mechanisms for surface drainage should be secured through a planning condition.

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

Wind

Documentation Accompanying the Planning Application: *A Wind Impact Assessment should be submitted with the application.*

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 19 storeys in height. Therefore there may be adverse effects on the existing wind conditions. This can be assessed throughout the normal planning process taking account of the Wind Impact Assessment. Mitigation measures should be incorporated into the development to reduce the impacts on those within and adjacent to the development to acceptable levels.

As such 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 a number of major developments in the surrounding area that are likely to be built, as detailed in 'Large Scale Development within the Vicinity'. 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.

The Council has considered a wide area consisting of other development sites adjacent or within the vicinity, particularly those within the Alperton Growth Area or that might generate transport movements along Ealing Road. Two of the applications identified (16/2629 and 18/0321) as part of the cumulative assessment were subject to Environmental Impact Assessments. The Council has considered the information contained within this assessment 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. The limited on site provision of parking, will ensure the majority of sites will not generate greater numbers of vehicle trips than currently. Where it is anticipated that there will be additional trips than is the case currently, for example on the Northfields, a range of local physical interventions are proposed to deal with capacity issues.

It is anticipated that CIL and S106 and other funding streams from Government and service providers will address capacity issues that might exist in relation to on and off-site infrastructure.