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31st March 2020

Dear June

**Alperton Bus Depot: 330 Ealing Road, Wembley, HA0 4LL  
Request for a Screening Opinion – Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017**

We write on behalf of our client, Telford Homes to request a formal Screening Opinion in relation to the proposals for the demolition of the existing buildings on Site and its redevelopment for a mix of uses including up to 484 new residential homes, across a range of tenures including affordable homes, together with up to 2,900sqm of light industrial floorspace, retail and commercial use and associated landscaping (“the Project”).

Further to on-going pre-application discussions, being led by the planning consultants at Barton Willmore, pre-application advice received on the 6 January 2020 (ref: 19/0279/PRE) confirmed that a screening opinion is required for this scheme, to determine whether it requires an Environmental Impact Assessment (EIA).

Whilst the final layout and massing of the Project will be subject to detailed design and consultation with the Local Authority, for the purpose of this Screening request, the upper parameters are considered in order to represent the ‘worst case’ environmental impact.

This letter therefore considers whether the development should be subject to an EIA for the purposes of the above Regulations. We enclose the following for your consideration:

- A plan sufficient to identify the land (see attached Site plan);
- A brief description of the nature and purpose of the development and its possible effects on the environment (see The Site and Surrounding Area and the Proposed Development below); and
- Additional information (see The Screening Process below).

In summary, we consider that the proposed development will not give rise to a need for EIA. We outline the analysis undertaken to reach this conclusion below and request that the Council confirm this view.

## **The Site and Surrounding Uses**

The Site is located at 330 Ealing Road, Wembley, within the London Borough of Brent (LBB). The Site is a roughly squared shaped plot of 0.56 hectares (ha). A Site Location Plan is provided at Annex A of this letter.

The Site is bound by Ealing Road to the southeast; Bridgewater Road to the southwest; Alperton Underground Station to the northeast; and an electrical sub-station to the northwest.

The Site is currently occupied by the Alperton Bus Depot, which is an operational bus depot run by Metroline. In terms of existing access, the entrance to the Site is from Bridgewater Road. A further two vehicular accesses are also provided via Ealing Road.

There is a large two storey garage facility and a smaller two storey office building situated on Site. The embankment on the north west boundary of the Site and the railway is mostly overgrown bushes and shrubbery.

There are no statutory listed buildings on or adjacent to the Site. The entrance to the Alperton Underground Station, which is located approximately 95 metres to the north east of the Site is locally listed.

There are a mix of uses within the surrounding area. Alperton Underground (Piccadilly line) is located to the northeast of the Site. Alperton Community School is situated north east of the site backing onto One Tree Hill Recreation Ground, the nearest public amenity space to the Site.

The southern part of One Tree Hill Recreation Ground is designated as Grade II SINC.

The immediate area surrounding the Site is undergoing transformation in line with the Alperton Growth Area and Objectives Masterplan and the GLA designated Housing Zone. This includes Alperton House, a six storey building located to the south east of the Site, has planning permission (ref: 18/4199) for a car free mixed use development of 474 residential homes.

Minavil House, located to the southwest of the Site and is currently under construction. The proposals involve the erection of a mixed-use development of 241 residential units, office space and a supermarket unit (ref: 16/2629).

Atlip Road, southeast of the Site, was granted planning permission on 26 May 2017 for 99 residential units (ref: 15/2061). 243 Ealing Road, south of the Grand Union Canal was granted planning permission for 441 residential units spread across 7 buildings in September 2009 (ref. 09/2116) with a non-material amendment granted in June 2014 (ref. 14/2600). The development at 243 Ealing Road was completed in 2016.

## **Site Designations**

In accordance with the Brent Site Specific Allocations DPD 2011 the Site is designated as:

- Locally Significant Industrial Site;
- Air Quality Management Area.

In line with the Draft Brent Local Plan Planning Policies (2019) it is allocated as falling within:

- The Alperton Growth Area;
- LSIS;

- Article 4;
- Tall Building Zone.

## The Project

The key elements of the Project and of which this request is based on are set out below:

- Demolition of all existing buildings;
- Up to 484 dwellings;
- Three buildings of up to 33 storeys, 29 storeys and 21 storeys;
- Up to 2,900sqm of light industrial space on the ground, first and second floors;
- Community and Retail/café uses on ground floor;
- Associated landscaping; and
- 15 blue badge car parking spaces and 850 cycle parking facilities.

The Alperton Bus Depot that currently occupies the Site will be relocated to the south side of Athlon Road approximately 300m to the south west of the Site. This will be subject to a separate planning application.

## The Screening Process

On 3<sup>rd</sup> March 1997, the Council of the European Union amended Directive 85/337/EEC through Council Directive 97/11/EC, which was given legal effect in England and Wales through the Town and Country Planning (Environmental Impact Assessment) Regulations 2011, in so far as it relates to development under the Town and Country Planning Act 1990. There have been a number of amendments to the EIA Directive, the most recent of which (2014) was transposed into UK law on the 17<sup>th</sup> May 2017.

The Project 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 dwelling house development; or
- (ii) the development includes more than 150 dwellings; or
- (iii) the overall area of the development exceeds 5 hectares.

The development proposes up to 484 residential dwellings. This exceeds the threshold for 150 dwellings, and therefore the Project constitutes 'Schedule 2 development'. Consideration must therefore be given to whether the

Project may give rise to significant environmental effects, such that an EIA may be required. It is noted that for category 10(b) projects the Planning Practice Guidance goes on to state that “*in addition to the physical scale of such development, particular consideration should be given to the potential increase in traffic, emissions and noise*” and that “*EIA 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*”.

The extent of potential impacts is likely to be localised. Moreover, the magnitude, probability and complexity of any impacts on the environment will be low, given the proposed uses. The characteristics of the development and the likely environmental impacts are considered in further detail below.

### **Schedule 3 of the Regulations**

The development is one to which the Regulations may apply because it falls within Schedule 2 as an urban development project that includes more than 150 dwellings. However, Schedule 2 provides only an indicative threshold and the size of the development should not be in isolation determine the need for an EIA. For Schedule 2 developments, the 2017 Regulations require and EIA to be undertaken where:

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

In determining whether the development is likely to give rise to significant environmental effects, reference should be made to Schedule 3 of the Regulations. This identifies three factors that should to be taken into account:

1. Characteristics of the development (such as size, cumulative effects, use of natural resources, production of waste, pollution and nuisances, risk of accidents and risks to human health);
2. Location of development (by reference to the environmental sensitivity of the area); and
3. Characteristics of the potential impact (having regard in particular to the extent of the impact, its transboundary nature, magnitude and complexity, probably and duration, frequency and reversibility).

### **Development Characteristics**

#### **Size**

The Site comprises an area of **0.56 ha** and which will accommodate up to 484 residential dwellings and up to 2,900 sqm of non-residential floorspace.

#### **Use of Natural Resources and Production of Waste**

The Project will not result in the significant loss of resources considered to be scarce. The energy efficiency of the Project is expected to be in line with local and national policy and legal requirements.

The use of natural resources will be typical for an urban development project such as that proposed, as will the production and management of waste. Waste and recycling collection services will take place from a dedicated area within the site. The level and method of waste and recycling is not expected to be significantly different to the existing situation.

Appropriate storage space for commercial, domestic and recycled waste will be provided within the development for each of the proposed uses, details of which will be included within the planning application documentation and can be secured under planning condition.

#### Pollution, Nuisances and Risk of Accidents

The Project will incorporate up to 2,900sqm of light industrial floorspace. This will be housed within a mix of unit sizes located at ground, first and second floors. This space will be accessed by vehicles and pedestrians from Ealing Road at the north east corner of the Site. It will include yard space being available as general public realm or external workspace. The yard space will be used primarily by the industrial tenants, it will have managed access to the public for events such as craft fairs and markets. The general public will not have access to this area outside of working hours which will reduce the risk of accidents and any nuisances on future residents.

Given the non-hazardous materials associated with the construction of the Project, the effect of pollution and nuisances will be low. Likewise, the risk of accidents will be low, managed in accordance with Health and Safety regulations.

The construction contractor will be obliged to adhere to environmental health / noise requirements that are typically imposed upon such Projects. A Construction and Environmental Management Plan (CEMP) to be agreed with the Council in order to comply with a condition imposed on any grant of planning permission. The contractor will be obligated to work within the terms of the CEMP to ensure that development impacts are managed in accordance with standards set by environmental legislation.

Given the nature of the Project (a residential led mixed use scheme) and the low risk of many major natural disaster events, these are not considered relevant to the Project. The urban nature of the Site means that wildfires are also not relevant. The Project will be built out to the latest Building Regulation requirements which will deal with the potential impact from extreme temperatures.

The risk of storms and flooding is considered in more detail below.

The risk of major accidents or man-made disasters are not considered relevant given the residential/commercial/light industrial use proposed and the lack of heavy industrial use within the surrounding area.

#### **Location of Development**

The Site is not within an environmentally sensitive area as defined within the Regulations.

The Project will not affect the absorption capacity of the natural environment (as demonstrated below). The Site is not located within a zone at risk of flooding (it is located within Flood Zone 1), but due to the site having a greater area than 1 ha, a Flood Risk Assessment will accompany the planning application that will assess the risk of flooding and surface water drainage).

The Site is not located within an Archaeological Priority Area.

The Site is located within part of the Borough's Air Quality Management Area on the basis that nitrogen dioxide is likely to exceed the annual mean national Air Quality Objective.

There are no nature Conservation Sites with statutory protection within 2km of the Site.

A wildlife corridor is present along the adjacent track's embankments situated immediately north of the Site.

## **Characteristics of the potential impact (having regard in particular to the extent of the impact, its transboundary nature, magnitude and complexity, probability and duration and reversibility)**

The Project comprises a typical urban development project and would not have significant environmental impacts. In reaching this view, we have identified the following potential impacts.

### Highways and Transportation

The Site has a Public Transport Accessibility Level rating of 4-5 which indicates good/very good access to public transport. It is located adjacent to the Alperton Underground Station, which is served by the Piccadilly line providing frequent services. The closest bus stops are located on Bridgewater Road, immediately to the west of the Site, which provide access to bus routes 245 and 487. Bus stops on Ealing Road provide access to bus routes 79, 83, 224, 297 and 483.

The Site is not located within a Controlled Parking Zone (CPZ).

The existing Site is used as a bus depot which is operated by Metroline. It is currently used to park up to 75 buses. Bus maintenance, refuelling and welfare facilities are also present on the Site.

A baseline traffic survey was carried out on 26<sup>th</sup> November 2020, which is summarised in the following text. On a typical day, the first bus drivers arrive on site at approximately 5am to commence the morning bus service. The busiest hour is between 1pm and 2pm with 54 vehicle movements when there is a driver shift change. During the traditional morning and afternoon peak hours there are around 25-30 vehicle movements. In total there are 629 two-way traffic movements per day (428 by bus).

The Project will see a reduction in vehicle access points to the Site, from four to two. Two of existing the access points on Ealing Road (closest to the signalised junction) will be removed. The Project proposes one access point on Ealing Road in addition to a managed drop off space on the public highway. Another vehicle access will be provided on Bridgewater Road.

The residential element of the Project will be car free with the exception of disable parking provision (approximately 15 spaces for both residential and non-residential land uses) and two car club spaces, which is considered to be negligible in terms of trip generation.

The Project is anticipated to generate servicing demands, for instance for deliveries and waste collections. It is anticipated that on average a total of 65 deliveries per day (43 residential and 22 workspace) will take place, with up to eight in a given hour. This equates to up to 130 two-way traffic movements per day.

The future traffic generation of the site will be considerably lower than the baseline position (629 two way traffic movements per day). As such, it can be concluded that the Project will not give rise to significant environmental effects that will require assessment under EIA.

Cycle parking will be provided in line with draft London Plan standards. All accessible parking spaces and the car club spaces will be provided with either active or passive electric charging provision in line with the draft London Plan.

The development is expected to generate up to 244 public transport trips in the morning peak hour. Given the significant capacity of the local public transport network (22 Piccadilly Line services and 34 bus services in the morning peak hour) all public transport trips can be accommodated with minimal impact. The potential impact on public transport is considered to be negligible.

A full assessment of the transport implications of the proposed development on the highways and public transport networks will be provided as part of the Transport Assessment. It will also assess the potential for cumulative impacts along with other reasonable foreseeable development (specifically that identified within the Alperton Growth Area) and will fully consider the active and proposed developments within vicinity to the scheme. Any required transport mitigation will be identified and secured through the planning permission, to be agreed with LBB Highways and Transport for London (TfL).

In order to mitigate any potential non-significant impacts in relation to transport it is recommended that the following are secured via planning condition or S106 agreement:

- Delivery and Servicing Plan;
- Construction Logistics Plan;
- Framework Travel Plan, and
- Parking Design and Management Plan.

#### Air Quality

The Site is located within the Brent Air Quality Management Area. There are four Air Quality Monitoring Stations throughout the Borough of Brent. There are also 44 Air Quality (NO<sub>x</sub>) Diffusion Tubes throughout the borough. One monitoring station is located directly next to the site at Bridgewater Road/ Ealing Road<sup>1</sup>, ID7.

The Environmental Agency's pollution register indicates that there are no large scale authorised industrial processes located within the vicinity of the Site that are likely to have a significant influence on air quality at the Site. The northern Site boundary is also located approximately 11 metres to the south of a railway line, which is electrified, and therefore trains using this line will not produce any emissions to air.

Given that there will be at worst case negligible impact, and at best case beneficial impact associated with operational vehicle trip generation, it is considered that there will be no adverse air quality impacts arising from the Project.

It is acknowledged that the Project will see the introduction of residential receptors at the Site, who in turn have the potential to be affected by the local air quality conditions. Potential emission sources are road traffic and comfort heating units located on the building. Fleet vehicle emissions have historically improved over time which can be mainly attributed to improvements in vehicle technologies. Therefore, it is expected that road traffic emissions will be lower in future years. Moreover, the final design and location of any comfort heating exhaust stack will be such that they will not contribute to building self-contamination through operable windows or air intakes.

With the aim of minimising energy consumption and carbon emissions, the Project has been proposed to use a combination of Photovoltaic Panels, Ground Source Heat Pump and/or Air Source Heat Pump to provide heating and hot water demands. The Project is designed to have environmental assets such as, internal winter gardens on the facades facing the rail and road elevations.

If, in the case of a power cut, an emergency diesel-fired generator is expected to be used, this emission source will be considered in the assessment. The project is designed to have environmental assets such as internal winter gardens on the facades facing the rail and road elevations. The new development is also expected to meet building

<sup>1</sup> The London Borough of Brent Air Quality Annual Status Report for 2018 (published in September 2019) – Table C  
<https://www.brent.gov.uk/media/16414803/air-quality-annual-report-for-2018.pdf>

emissions benchmarks set out in Appendices 5 and 6 of the Mayor's Sustainable Design and Construction SPG, where the building falls under Class C3 (residential dwellings)<sup>2</sup>.

An Air Quality Assessment addressing any air quality impacts associated with the introduction of residential receptors will be carried out and it will accompany the planning application documentation. However, given the above it is considered that the Project will not give rise to significant adverse air quality effects that will require detailed assessment under EIA.

### Noise

Given that there will be an at worst case negligible impact, and at best case beneficial impact associated with operational vehicle trip generation, it is considered that there will be no adverse noise impacts, on receptors located outside of the Site, arising from the Project.

Due to the surrounding physical environment, adjacent to the Piccadilly railway track and two major roads, a survey assessing noise and vibration impacts and any mitigation measures proposed will be submitted as part of the planning application.

The Project will see the introduction of residential use in an area previously utilised as commercial land, which is in proximity to road and the London Underground. As such there could be impacts to the new residential receptors. The Project will be designed with careful consideration of the layout of uses and the design of the building envelope, taking into account appropriate external and internal acoustic criteria. To this end, an acoustics consultant has been appointed and a noise assessment will be carried out and submitted with the planning application.

The assessment will consider the noise and vibration effects of noise from existing sources within the habitable rooms of the proposed incoming residential accommodation and identifies the mitigation measures that will be required to achieve acceptable levels. The internal noise levels within habitable rooms will be considered using calculation procedures and guideline target noise levels provided in BS 8233:2014.

Consideration will also be given to the vibration and noise from the railway tracks situated on the northern boundary of the site and any impact from train traffic pulling in and out of Alperton Underground Station. Perceptible vibration inside buildings can give rise to discomfort, disturbance and/or activity interference, as well as giving rise to concerns and building damage when the magnitude of vibration exceeds certain threshold values. The vibration levels will be compared to the VDV values set out in BS 6472:2008.

As such it is considered further assessment, under EIA, is not required.

<sup>2</sup> [https://www.london.gov.uk/sites/default/files/gla\\_migrate\\_files\\_destination/Sustainable%20Design%20%26%20Construction%20SPG.pdf](https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Sustainable%20Design%20%26%20Construction%20SPG.pdf)



## Flooding and Drainage

### *Flooding*

The EA flood map for planning has been consulted and the Site is within flood zone 1. This means that the Site is at very low risk of flooding from river and sea flooding. On review of risk from other sources of flooding with the more detailed EA flood maps it has been found that the Site is at low risk from surface water flooding with some high risk areas adjacent to the site but not on the Site.

As per government guidance therefore a Flood Risk Assessment is required to accompany the planning application.

Within the Flood Risk Assessment, the following sources of flooding will be assessed with recommended mitigation outlined where applicable:

- Tidal and Fluvial Flooding;
- Coastal Flooding;
- Pluvial, Surface Water Flooding and Overland Flow;
- Flooding from Sewers;
- Groundwater Flooding;
- Flooding from Reservoirs;
- Post Development Flood Risk;
- Flood Flow Paths;
- Displaced Flood Volumes, and
- Impact on Fluvial Morphology.

In line with the London Plan, draft London plan and National Planning Policy Framework to maintain the site's low level of risk to surface water flooding a SuDs strategy will need to be adopted as set out in the following section.

### *Surface Water/Drainage*

As part of the Flood Risk Assessment both foul and surface water strategies will be undertaken. The anticipated foul water strategy will drain via gravity to the roads to the south. We understand a basement is not currently being proposed however if it was included any basement drainage networks would drain into the gravity system with the use of private pumping stations.

For the surface water design the SuDS Hierarchy will be discharged with the current anticipated outcome being a gravity network again discharging to the sewers in the adjacent roads in conjunction with the use of blue roof attenuation within the first floor podium gardens and additional attenuation within the ground floor area referred to as Alperton Yard.

### Ecology

The majority of the existing Site is covered by existing buildings or hardstanding. A wildlife corridor is present along the railway track's embankments situated just north of the Site's boundary. The Site has limited ecological value. However, a preliminary ecological appraisal will be submitted with the planning application and proposals to enhance the wildlife corridor and its biodiversity will be incorporated within the scheme where possible.

One Tree Hill Open Space sits approximately 200m north of the site. A parcel of land within the south element of One Tree Hill, previously occupied by Allotment Gardens is designated SINC Grade II. The SINC Grade I Piccadilly Line between River Brent and Sudbury Hill is also located some 200m to the south east of the site. Any lighting will

be sensitively positioned and of low lux levels in order to minimise light pollution. It is anticipated that the detailed landscape and lighting strategy can be secured via a standard planning condition.

It can be concluded that the Project is not likely to give rise to adverse impacts in relation to ecology and biodiversity. There is the potential for there to be a net gain in biodiversity, however this is likely to be of negligible to low significance.

### Microclimate

Near the ground, the effects of surface roughness associated with buildings, trees or other obstructions influences certain aspects of behaviour and properties of the wind causing the wind speed to generally increase with height. Consequently, impacts arising from wind are typically associated with large buildings over 10 storeys in height which can cause windward vortexes where the wind blows perpendicular to the building and is diverted downward to ground level, which may then subsequently be subjected to corner accelerations or other channelling effects.

The tallest building is proposed to be 33 storeys, with adjacent buildings of 29 and 21 storeys. Therefore, there is a potential for adverse wind effects. However, the impact on the ground level microclimate depends on the relative difference in height between buildings, geometry of the buildings themselves and the sensitivity of anticipated uses at ground level and provision of inherent measures which would provide localised shelter in key spaces as part of good design.

The nearby existing and proposed buildings are mid-rise which would be expected to provide an element of shelter to the site by reducing the speeds of certain oncoming wind flows.

The design team has engaged RWDI, wind microclimate specialists who are actively providing design input to the evolving scheme and a Wind and Microclimate Report based upon a fully-quantitative wind tunnel testing exercise of a scale physical model will be submitted in support of the planning application. This will consider the potential impact of the proposals and advise on mitigation measures that can be designed into the scheme to ensure that there is no significant adverse impact arising.

### Archaeology

There are no World Heritage Sites, Scheduled Monuments or Historic Battlefield designations within or adjacent to the Site. Additionally, there are no Listed Buildings or Conservation Areas within or adjacent to the Site.

The Site does not lie within an Archaeological Priority Area (APA). The nearest APA is approximately 100m southwest of the site, it is not envisaged that the Project at the Site will impact the APA.

The nearest recorded heritage asset to the Site is the Alperton Underground Station at the northern edge of the Site boundary. Otherwise, initial findings indicate that the Greater London HER does not record any heritage assets within the Site boundary.

Given the above, it is considered that the project is unlikely to have a significant impact on any below ground archaeology.

However, if required, potential mitigation, such as recording, can be demonstrated through an archaeological investigation which can be secured via standard planning condition.

### Ground Conditions

The Site is located in an industrial area, with a large number of potentially contaminative land uses nearby through its history. Key potentially contaminative land uses on the site have included a garage, bus depot and electricity substation. A substation is present on the plot of land adjacent to the northwest. Due to the sites previous uses it is anticipated that there is a potential for contamination within the Made Ground, including from hydrocarbons and PCBs (related to the substation use). The site was redeveloped before 2000 and therefore there is also a potential for asbestos in the Made Ground soils.

The soils are anticipated to be clayey Made Ground over a layer of London Clay Formation approximately 50m thick. Therefore, contaminant migration both onto site from off-site sources and from site to receptors such as controlled waters is anticipated to be limited.

This is typical for a Site of this nature and, as demonstrated in the conceptual model, appropriate mitigation measures have been suggested.

A Phase II site investigation will be submitted following the grant of planning permission and appropriate mitigation measures will put into place.

#### Socio-Economic

The Site is currently a functional bus depot and employs a number of people. The emerging Local Plan allocation requires the replacement of industrial and commercial uses as well as the provision of residential units. The scheme has been designed to offer up to 2,900sqm of light industrial floorspace, community and retail/café uses which will ensure the employment on the site is at least as high as existing and potentially higher.

During construction the Project will have positive economic impacts due to the number of jobs supported and the indirect effects of that increase of employment.

The Project will introduce a residential use on a Site that has been in employment use for a number of years. The provision of new housing to meet current demand, including an allocation of affordable housing is assumed to have a positive social impact. There is however likely to be a subsequent increase in demand on social infrastructure such as local services, including GPs and schools.

There are nine schools within a 1.3 mile walk of the Site (source: <https://www.compare-school-performance.service.gov.uk/>). Four of the nine schools are not currently at full capacity. However, despite both Alperton Community School and John Fisher Catholic Primary School showing as over capacity, both schools are accepting admissions for 2020-21. No information was available online for the 2020-21 admissions policy for Vicar's Green Primary School and Barham Primary School. No information was available for the existing number of pupils at A Perfect Start Nursery.

School Name	Provision	Walking Distance from Site	Number of Pupils <sup>3</sup>	Capacity	Capacity – Yes or No?
A Perfect Start Nursery	Pre-school	8 minutes (0.4 miles)	N/A	30	N/A

<sup>3</sup> Information retrieved from <https://www.compare-school-performance.service.gov.uk/> (Accessed 05/03/2020)

Alperton Community School	Ages 11 to 18 (Secondary)	10 minutes (0.5 miles)	1,543 as of Nov 2019	1,476	No <sup>4</sup>
Lyon Park Primary School	Ages 4 to 11 (Primary)	11 minutes (0.5 miles)	919 as of July 2019	920	Yes
The Corner School	Ages 5 to 12 (Primary)	11 minutes (0.6 miles)	3 as of Jan 2020	35	Yes
St John Fisher Catholic Primary School	Ages 4 to 11 (Primary)	14 minutes (0.7 miles)	426 as of Sept 2019	420	No <sup>5</sup>
Vicar's Green Primary School	Ages 3 to 11 (Primary)	16 minutes (0.8 miles)	464 as of Sept 2019	420	No
Barham Primary School	Ages 4 to 11 (Primary)	18 minutes (0.9 miles)	930 as of Jan 2020	930	No
Elsley Primary School	Ages 4 to 11	20 minutes (1.0 mile)	608 as of July 2010	660	Yes
Ark Elvin Academy	Age 11 to 18 (Secondary)	24 minutes (1.3 miles)	930 as of Jan 2020	1200	Yes

Overall, it is considered that there will be a positive impact in terms of on-site employment in both the construction and operation phase, a positive impact on the housing market and local expenditure and a minimum impact on primary and secondary education and primary healthcare, which will be mitigated through the provision of CIL payments.

#### Daylight and Sunlight

The surrounding area consists of a mix of uses (including the local Alperton Community School playground area located to the north of the Site). There are also a number of recently permitted residential schemes which will need to be considered in daylight and sunlight terms.

A daylight and sunlight assessment will be required to support the planning application, which will consider the Vertical Sky Component (VSC), Daylight Distribution (DD) and Annual Probably Sunlight Hours (APSH) tests. An overshadowing assessment will also be carried out to understand the impacts to the amenity areas adjacent to the site.

A daylight and sunlight specialist consultant was appointed at the initial stages of the design development, in order to work with the design team to mitigate potential adverse impacts associated with the built form.

<sup>4</sup> Despite the Government website stating that the school is currently over capacity, the Alperton Community School Admissions Policy 2020-21 have 814 places for 2020-21 admission (<http://www.alperton.brent.sch.uk/year-6-into-7-admissions/>)

<sup>5</sup> Despite the government website stating that the school is currently oversubscribed, the St John Fisher Catholic Primary School Admissions Policy 2020-21 details that the school has 90 places for 2020-21 admission <https://www.stjohnfisherschool.co.uk/admissions/>

It is anticipated that potential for impacts will be mainly associated with the permitted scheme at Minavil House, Alperton House and Alperton Community School. These are considered in further detail below.

#### *Minavil House – Daylight*

The VSC results demonstrate that the majority of windows will not adhere to the BRE guidelines, there are 24 (9%) out of 256 windows that will adhere to the BRE guidelines.

It should be noted that in the existing condition 197 (77%) out of 256 of the windows do not meet the BRE recommended value of 27% VSC, therefore relatively modest reductions will technically be considered to be transgressions when using the BRE guidelines. For example, on the second floor R13 a Living/Kitchen/Diner (LKD) has an existing VSC of 6.11% and reduces to 3.37% proposed VSC which numerically is a reduction of 2.74% VSC but has a ratio reduction of 0.55.

Another factor to take into consideration, is that there are large balconies to this building which will inevitably limit the daylight and sunlight availability. One way to demonstrate whether the balcony is the main factor for the VSC reductions or whether it is the proposed development, would be to carry out an additional calculation of the VSC and area receiving direct skylight without the balcony in place.

The DD results demonstrate that 102 (54%) of the 188 rooms tested will adhere to the BRE guidelines. Generally, those rooms with the larger reductions are single aspect bedrooms or deeper LKDs with overhead balconies. If a supplementary assessment were to be run without the balconies in place this would likely improve the overall adherence.

#### *Minavil House – Sunlight*

The BRE guide recommends: “*all main living rooms of dwellings, should be checked if they have a window facing within 90° of due south. Kitchens and bedrooms are less important, although care should be taken not to block too much sun.*” None of the windows tested face within 90° of due south.

Therefore it can be concluded that the development will not give rise to significant adverse impacts that will require further assessment under EIA.

#### *Alperton House - Daylight*

The VSC results demonstrate that 100 (31%) out of 326 windows will adhere to the BRE guidelines. As with Minavil House, several of the windows do not meet the BRE recommended value of 27% VSC in the existing condition, therefore relatively modest reductions will technically be considered transgressions, however, the reduction numerically is relatively small. There are also overhead balconies, which are limiting the daylight and sunlight availability.

The DD results demonstrate that 152 (79%) out of 192 rooms tested will adhere to the BRE guidelines.

#### *Alperton House – Sunlight*

Initial testing of the habitable rooms which have windows facing within 90° of due south has been carried out. The annual sunlight hours results demonstrate that 46 (78%) out of 59 rooms tested will adhere to the BRE guidelines. All (100%) of the 59 rooms will adhere to the BRE guidelines for the winter sunlight hours.

Therefore, it can be concluded that the development will not give rise to significant adverse impacts as the initial analysis demonstrates good levels of adherence for both the annual and winter sunlight hours.

### *Alperton Community School – Overshadowing*

A two hour sun on ground test for the playground area of the school grounds was run on the 21st March as recommended in the BRE guidelines. The sun on ground results demonstrate that in the existing condition the amenity area will be lit 98.22%, and in the proposed condition there will be a negligible reduction to 98.02%. This demonstrates adherence to the BRE guidelines.

### *Other surrounding areas*

Low-rise residential buildings characterise the area northwest of the Site. North of the Site, beyond the railway tracks, One Tree Hill Recreation Ground is located.

The design development suggests that approx. 70% of all units will be dual aspect, therefore we anticipate there will be a good level of daylight and sunlight adherence for the proposed units. We anticipate that the lower level units may have results which transgress from the BRE recommendations; however the guidelines are intended to be applied flexibly particularly in an urban context.

A Daylight, Sunlight and Overshadowing assessment will be undertaken and submitted with the outline planning application, with recommendations being implemented into the Project during the design stage for both internal and external daylight levels.

### Heritage and Townscape

The Site currently comprises of a bus depot with car parking which makes no intrinsic contribution to the local townscape. It does not include any listed buildings and is not within a Conservation Area. In addition, there are no statutory listed buildings within the surrounding area of the Site. The locally listed Alperton Station, 4 Stanley Avenue is located less than 100m to the north.

In addition, to the north of the Site, Nos.1-3 and 2-4 Stanley Avenue are identified as locally listed buildings, however, the nature of interposing built form and separating distances means that there are unlikely to be any significant effects on their heritage significance, through change in part of their varied townscape settings.

There are two locally listed parks and gardens located to the north-west of the Site: One Tree Hill and Alperton Cemetery.

Whilst there will be a significant change in views from some parts of One Tree Hill open space, there is unlikely to be a significant impact on appreciation of the particular heritage significance of the locally listed park and garden as an urban landscape of recreation. The heritage significance of the open space, as an early 20th Century landscape area, is understood in the context of wider urban context of both domestic townscape and the existing and emerging taller / denser town centre to the southeast, including the Site.

Alperton Cemetery is an urban cemetery, enclosed by built form which is an established part of its significance and setting. Due to separation distances, interposing built form and landscaping, the proposed development is not likely to impact on an appreciation of its heritage significance as a 20th century place of burial, commemoration and remembrance.

The application will also be accompanied by a proportionate Heritage Statement that will assess the significance of this locally listed buildings (and other relevant heritage assets), including the contribution made by setting (and the Site as an element of setting, as appropriate) to that significance. That understanding of heritage significance will inform an impact assessment of the proposed development, prepared in accordance with the requirements of national and local policy and best practice guidance/advice.

The baseline conditions of the townscape and visual context of the Site and the likely townscape and visual effects have been considered by a townscape and VIA professional from Turley Heritage and Townscape. This identified that there are no townscape or visual receptors of High sensitivity within the study area. The townscape character area of the Alperton Mixed-Use Growth Area, is considered to be of Ordinary Value and Low Sensitivity due to a range of factors including: it not being covered by any townscape designations; the existing allocation of the land for development including tall buildings; the poor condition of existing built form and public realm; and, the presence of existing and consented development of a similar scale in the surrounding area which influences the character of the area. The identified visual receptors that would experience views of the Project vary in Sensitivity from Low (non-designated and ordinary views experienced by road users on busy roads) to Medium-High (visitors to locally listed open spaces).

The Project would result in the introduction of large scale built form in place of the existing bus depot. This would permanently change the character of the Site itself, that character of TCA1 and the trees and shrubs within the Site. The Project is a mixed-use development that would be of a similar scale to surrounding consented schemes within the Growth Area. Furthermore, the Project would result in enhancements to the quality of the built form, public realm and landscape features within the Site. The Project would result in permanent changes to views experienced by identified visual receptors including: pedestrians and road users in close proximity to the Site; pedestrians and cyclists on the Grand Union canal towpath; users of the Piccadilly Line; residents of existing and consented residential properties; students/staff at Alperton Community School; and, users of open space in the local area. It is likely to be a prominent feature in some local views with the greatest scale of change experienced by those receptors located near to the Site boundary. The Site is located within a Growth Area where large scale development is coming forward and tall buildings are considered acceptable. The changes to views would, therefore, be read in conjunction with the existing and evolving character of the urban townscape.

Overall, while some adverse townscape and visual effects are likely, the Project would generally result in an improvement to townscape character and local views and it was concluded that it was unlikely that the Proposed Development would result in significant townscape or visual effects. This is due to the townscape context and condition of the Site which is considered appropriate for the type and scale of development proposed (particularly in relation to the evolving growth area and nearby consented schemes in Alperton town centre), the existing surrounding uses, and the typically low or medium sensitivity of townscape and visual receptors.

A Townscape and Visual Impact Appraisal (TVIA) will be undertaken in accordance with best practice guidance and submitted with the planning application. A Scoping Note summarising the intended methodology, initial baseline work and identified townscape and visual receptors to be assessed within the TVIA was sent to the Council on the 30 January 2020, the methodology of which has been agreed with the LPA. Recommendations are being implemented into the Project during the design stage in order to mitigate adverse effects and / or facilitate enhancements to townscape character, visual amenity and views.

## **Construction**

There is a risk of the release of dust and increase in noise from equipment and activities during construction. A Code of Construction Practice (CoCP) or a construction and Environmental Management Plan (CEMP) will ensure that any construction activities will be in accordance with environmental protection legislation that will limit disturbance from construction activities as far as is reasonably practicable. As such, it is considered that the construction of the development will not significantly impact upon neighbouring residents. There is likely to be some release of dust during construction. However, it is proposed to adopt best practice methods of construction in order to minimise dust. This can be further regulated through standard planning conditions to ensure that local amenity is not significantly reduced.

## **Cumulative Development**

There are a number of proposed developments that are emerging or under construction near to the Site. It is considered that they are part of the baseline environment or in cumulative terms (i.e. permitted but not yet built).

Alperton House, located to the south east of the Site was granted planning permission in June 2019 (ref. 18/4199) for a residential led mixed-use development. This scheme was subject to a Screening Request concerning the demolition of the existing buildings and construction of 4 buildings ranging in height from 14 to 23 storeys, comprising 474 residential units, mixed commercial use including a new public house, retail floorspace, workspace, and an office, together with associated public realm improvements. The Screening Request considers the potential cumulative impacts of Alperton House redevelopment. LBB issued an EIA Screening Opinion on 30 May 2018 and again following some revisions to the scheme on 7 August 2018 in both occasions stating that EIA was not required.

Minavil House, located to the southeast of the Site and is currently under construction. This application was permitted (ref. 16/2629) in January 2019 and was subject to EIA assessment. The proposals involved the demolition of the existing two storey commercial buildings and erection of a mixed-use development consisting of 251 residential units, office space and a supermarket unit. The proposals included 35 car parking spaces.

A scheme at 243 Ealing Road, south of the Grand Union Canal, was granted planning permission planning permission for 441 residential units contained within 7 buildings including 219 parking spaces in September 2009 (ref. 09/2116) with a non-material amendment granted in June 2014 (ref. 14/2600). The development was completed in 2016. The Screening Opinion concluded that having regard to the characteristics of the development, the location and potential impact, the proposed development would not have significant environmental effects and therefore an EIA was not required.

In addition to the above, it is proposed that the Bus Depot facility will be relocated to a Site on the south side of Athlon Road approximately 300m to the south west of the Site also falling within the administrative boundary of LBB. No demolition will take place at the Site until a suitable decant strategy has been agreed with TfL. It is envisioned that the Athlon Road site will be subject to a separate planning application. It is unlikely that this application will be subject to EIA Screening as it falls below the applicable threshold.

Taking the above into account, it is not considered that the Project, along with the cumulative development identified above will give rise to significant environmental effects that require assessment under EIA. It is therefore considered that the proposals are unlikely to result in any significant cumulative impacts.

Notwithstanding the above, the following technical reports will be submitted with the planning application:

- Design and Access Statement
- Planning Statement
- Transport Assessment
- Travel Plan
- Statement of Community Involvement
- Energy Strategy
- Overheating Assessment
- Sustainability Strategy
- Archaeological Assessment
- Daylight and Sunlight Assessment
- Flood Risk Assessment
- Noise and Vibration Assessment
- Air Quality Assessment
- Microclimate and Wind Assessment
- Foul Sewage and Utilities Assessment
- Retail Impact Assessment
- Contamination Report





- TV and Radio Assessment
- Heritage Townscape and Visual Impact Assessment

## **Conclusion**

It is considered that the proposed development will not give rise to significant effects on the environment taking account of the characteristics of the development, its location, and the potential impacts.

Therefore, we consider that the project will not constitute EIA development.

We request that, in accordance with the 2017 Regulations, that Brent Council confirm that they share this view, and look forward to receiving a Screening Opinion from you within the requisite period.

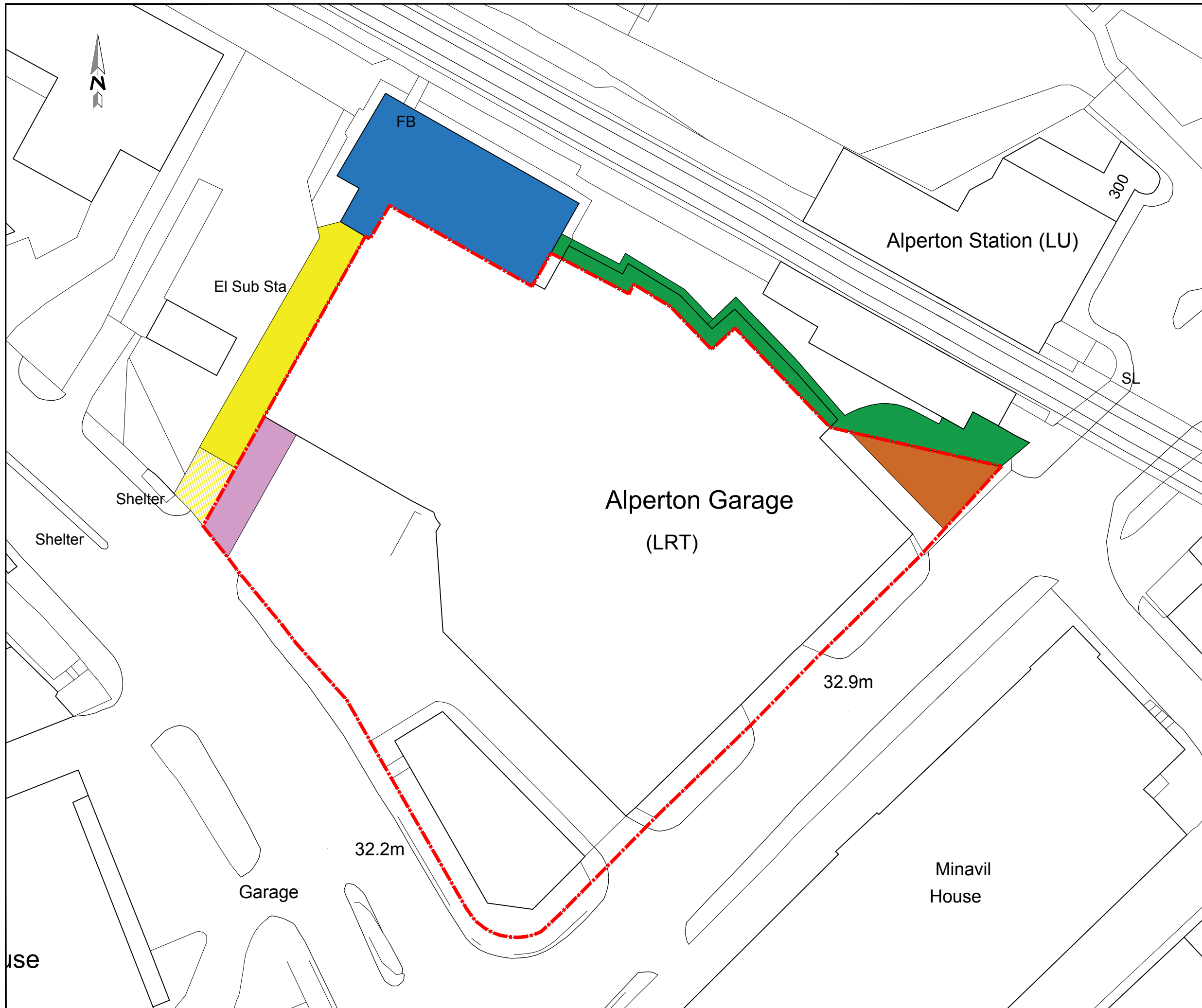
Should you require any further information to provide us with a screening opinion, please do not hesitate to contact me.

Yours sincerely

**Eve Campbell**  
Director



## **Annex A – Site Location Plan**



NOTES:  
 DO NOT SCALE. FIGURED DIMENSIONS ONLY TO BE TAKEN FROM THIS DRAWING. CHECK DIMENSIONS ON SITE AND REPORT DISCREPANCIES TO THE ARCHITECT.  
 THIS DRAWING IS PROTECTED BY COPYRIGHT.  
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 ALL BOUNDARIES AND HATCHED AREAS INDICATIVE ONLY OVERLAID FROM NOT TO SCALE SCANNED TITLE DEED PLANS (TITLE NO. NGL 716363 DATED 20TH JULY 1994)

- LEGEND:
- ADJOINING LUL STATION WITH PARTY WALLS
  - LAND WITHIN OWNERSHIP UNDER A SEPARATE TITLE. LEASEHOLD ONLY HAS 73 YEARS REMAINING. AS SUCH LAND NOT TO BE BUILT ON AND HAVE SOFT LANDSCAPE ONLY
  - LAND WITHIN OWNERSHIP BUT RESTRICTED BY COVENANTS. AS SUCH LAND NOT TO BE BUILT ON AND HAVE HARD LANDSCAPE ONLY
  - LAND WITHIN OWNERSHIP THAT LUL HAVE RIGHT TO PARK ON. LAND CANNOT BE BUILT ON UNLESS/UNTIL A SURRENDER IS AGREED/NEGOTIATED WITH LUL
  - ADJOINING LAND - VEHICULAR ACCESS ROUTE TO LUL SUBSTATION
  - ADJOINING LAND - VEHICULAR ACCESS ROUTE TO LUL SUBSTATION
  - OWNERSHIP BOUNDARY

P2	30.09.19	MINOR AMENDMENT TO ANNOTATION	SC	EA
P1	30.09.19	INFORMATION ISSUE	SC	EA
No.	Date	Comment	Drawn	Chk'd
Revisions				

Issue Status  
**PRELIMINARY**

**tp bennett**  
 architecture  
 interiors  
 planning

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Project  
**330 EALING ROAD  
 ALPERTON BUS DEPOT  
 BRENT**

Drawing Title  
**ASSUMED LAND OWNERSHIP  
 PLAN  
 EXISTING**

Drawn SC	Date 30.09.19	Scale @ A3 1:500	Alt. Ref. --
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tp bennett Project No. <b>A11745</b>	Drawing Number <b>E 0001</b>	Rev <b>P2</b>
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