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15<sup>th</sup> June 2021

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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 (a car showroom and a single storey row of industrial units) and the erection of three blocks comprising up to 173 residential dwellings (a mix of 1-bed, 2-bed and 3-bed in two blocks of 13 and 19 storeys) and up to 2,288 square metres (sqm) of commercial/ light industrial floorspace (Use Class E(g)iii), in a two-storey building. The proposed maximum height of the buildings will be up to 19 storeys (106.21m Above Ordnance Datum (AOD)). Up to ten disabled car parking spaces and cycle storage will be provided, and vehicular access will be via a one-way access road entering from the southeastern corner of the site, off Bridgewater Road. Residential access to each building is taken from within the public realm created within the site.

**Site:** Land at Bridgewater Road, Alperton, HA0 1AJ


I write in connection to your screening request submitted on 25<sup>th</sup> May 2021 by Barton Wilmore on behalf of Peabody Group. Reference has been made to Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations') "Requests for screening opinions of the relevant planning authority".

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

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

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

Yours sincerely,

A handwritten signature in black ink that reads "P. Lewin". The letter "P" is large and stylized, with a loop at the top. The name "Lewin" is written in a cursive style.

**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 the proposed demolition of all the existing buildings on site, and the erection of three blocks comprising up to 173 residential dwellings (a mix of 1-bed, 2-bed and 3-bed in two blocks of 13 and 19 storeys) and up to 2,288 square metres (sqm) of commercial/ light industrial floorspace (Use Class E(g)iii), in a two-storey building. The proposed maximum height of the buildings will be up to 19 storeys (106.21m Above Ordnance Datum (AOD)). Up to ten disabled car parking spaces and cycle storage will be provided, and vehicular access will be via a one-way access road entering from the south-eastern corner of the site, off Bridgewater Road. Residential access to each building is taken from within the public realm created within the site.

**Site** – Land at 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 Wilmore have requested a screening opinion from the London Borough of Brent (the Council) on 25<sup>th</sup> May 2021. 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. These documents had previously been submitted for a screening opinion in April and October 2019, but identified a lower provision of commercial floorspace (previously 850 sqm) and lower number of residential units (previously 145).

The redline plan has not changed from April/October 2019, and the Applicant is not aware of any additional approved developments that could have the potential to result in likely significant effects since April/October 2019.

## **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 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 site is within Flood Zone 1.

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 mixed-use residential and industrial 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 new draft Local Plan. This proposes that development within Alperton is set to focus around Alperton Station and the Grand Union Canal, providing a high quality public realm / pedestrian / cyclist environment. The site currently comprises a vacant car showroom of approximately 320sqm and a single storey row of units of approximately 300sqm.

The site is located near to Alperton Bus Stop C and Alperton Bus Stop D, which serve the 245, 487 and PL-4 routes. Alperton Underground station is located approximately 80m north east of the site boundary, which serves the Piccadilly rail line that borders the northern boundary of the site, 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). Beyond Alperton Underground station, to the east, is the A4089 (Ealing Road). The south west of the site is bound by Bridgewater Road (A4005). The site extends across areas with a Public Transport Accessibility Level (PTAL) of 4 and 5.

The site is located within the Brent Air Quality management Area (AQMA).

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

The proposal is for the demolition of all the existing buildings on site and the erection of three blocks with up to 173 residential dwellings (a mix of 1-bed, 2-bed and 3-bed in two blocks of 13 and 19 storeys) and up to 2,288 square metres (sqm) of commercial/ light industrial floorspace (Use Class E(g)iii), in a two-storey building, associated parking, and vehicular access and circulation. The proposed maximum height of the buildings will be up to 19 storeys (106.21m Above Ordnance Datum (AOD)).

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

The request for screening opinion has been submitted with a supporting statement and location plan setting out an analysis of the likely environmental effects of the proposal. Previous Screening reports were submitted in April 2019 and October 2019 and Screening Opinion responses from the Council provided. This request for a screening opinion notes that the maximum thresholds set out in the previous Screening Reports remain the same, with the exception of the number of residential units, which has increased from 145 to 173 – exceeding the threshold of 150, however the overall potential impact of the site remains limited. The proposed maximum commercial floorspace has increased slightly from 2,000 square metres (sqm) in October 2019 to 2,288sq.m in a two storey building. 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.

An EIA Screening Opinion was requested in April 2019 for the following proposal:

*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 sqm of commercial floorspace, associated parking, and vehicular access and circulation.*

The Screening Opinion was that an Environmental Impact Assessment would not be required.

An EIA Screening Opinion was requested in October 2019 for the following proposal:

*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 a maximum of 2000 sqm of commercial floorspace, associated parking, and vehicular access and circulation.*

The Screening Opinion was that an Environmental Impact Assessment would not be required.

## **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:

20/2784 Land Former 17 Northfields, Beresford Avenue, Wembley, HA0 1NW (Known as "Grand Union") Hybrid planning application comprising:- Outline planning permission for the demolition of existing buildings and structures on the site, all site preparation works and redevelopment to provide new buildings to accommodate new homes (Use Class C3), flexible commercial uses, new basement level, associated 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 with all matters reserved - appearance, access, landscaping, layout and scale. Detailed planning permission for Phase 3 (Buildings G, H and J) for the demolition of existing buildings and structures, all site preparation and infrastructure works and the development of new homes (Use Class C3) and flexible commercial floorspace; together with new basement level, 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. Permission subject to a Deed of Agreement dated 11 June 2021 under Section 106 of the Town and Country Planning Act 1990, as amended APPLICATION SUBJECT TO AN ENVIRONMENTAL STATEMENT | Land Former 17 Northfields, Beresford Avenue, Wembley, HA0 1NW (Known as "Grand Union") **Granted 15<sup>th</sup> June 2021**

20/3914 330 Ealing Road, Wembley, HA0 4LL Demolition of the existing buildings and structures, the erection of a building ranging in height up to 28 storeys, incorporating residential units and industrial, community and commercial uses, together with associated landscaping, access arrangements, car and cycle parking, servicing and refuse and recycling. **Granted 28<sup>th</sup> April 2021**

20/3156 1-26A, coachworks & storage areas, Abbey Manufacturing Estate, all units Edwards Yard, Mount Pleasant, Wembley, HA0 Demolition of the existing buildings and the erection of a mixed use development of buildings ranging between 3 and 16 storeys in height, comprising residential units, flexible commercial floorspace, affordable workspaces and community use floorspace, associated car parking, landscaping and ancillary facilities (phased development) **Granted 10<sup>th</sup> February 2021**

18/4199 Alperton House, Bridgewater Road, Wembley, HA0 1EH 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. **Granted 17<sup>th</sup> June 2019**

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) . **Granted 26<sup>th</sup> July 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 21<sup>st</sup> February 2019.**

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 21<sup>st</sup> January 2019** and commenced on site.

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 28<sup>th</sup> September 2018**. Phase 1 commenced on site.

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. **Granted 18<sup>th</sup> December 2017** and commenced on site.

## **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

The Council submitted its draft Brent Local Plan for examination to the Secretary of State on the 17<sup>th</sup> March 2020, following Full Council approval on the 19<sup>th</sup> February 2020. Examination hearings took place between the 29<sup>th</sup> September 2020 and 16<sup>th</sup> October 2020. 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) accompanies 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.

## 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 173 residential units and up to 2,288 sq.m of commercial floorspace. This proposal therefore falls below the indicative criteria and screening threshold at less than 5ha in area, but exceeds the threshold at more than 150 dwellings.

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 (NO<sub>2</sub>) and the 24 hour mean national objective for particulate matter (PM<sub>10</sub>).

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

Documentation Accompanying the Planning Application: *An Air Quality Assessment, Transport Assessment, Delivery and Servicing Plan, Construction Logistics Plan and Framework Travel Plan and Construction Environmental Management Plan (CEMP) will be submitted with the planning 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 PM<sub>10</sub> 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, with some extension over a PTAL 5 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 focused on disabled parking provision. Lower levels of provision in relation to the 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

As the site is within a growth area in the new Local Plan the Council is likely to seek an air quality positive 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 conditions.

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 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 Townscape and Visual Impact Assessment will identify the extent to which the development impacts on skyline and protected views.*

The closest feature 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 Assessment, Sustainability Statement, Construction Environmental Management Plan 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). The design will be based on achieving a discharge limit based upon greenfield surface water run off 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 & Vibration Assessment and CEMP will accompany the planning application.*

### **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 and Visual Impact Assessment will be submitted with the planning application which will address local and, where appropriate, long distance views.*

### Construction

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

### Operation

The height of the proposed development will be up to 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, whilst the Alperton House site has a proposed development of 23 storeys. The Minavil House site to the south east has a development of 26 storeys under construction. 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 which will include a Travel Plan will be submitted with the planning application.*

The site has a PTAL of 4/5 and is located in close proximity to Alperton Underground Station (Piccadilly Line) and near to Alperton Bus Stop C and Alperton Bus Stop D, which serve the 245, 487 and PL-4 routes. The proposed development will have limited parking.

## 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 and Travel Plan will set out how the site would be serviced when operational, which is consistent with an approach agreed with the local highway authority. As it is likely that limited on site car parking will be provided, operational traffic effects of the proposals are likely to be limited 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. There is likely to be additional use of the underground station and local bus services, which might need some capacity improvements.

## Mitigation

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

Suitable conditions associated with the Travel Plan will ensure reductions in impacts through vehicle 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 Land Survey 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/ Microclimate Assessment will accompany the planning 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. On its own, or in combination with existing or proposed adjacent tall buildings 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. Four of the applications identified (16/2629, 18/0321, 20/3914 and 20/3156) 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 site, 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.