

**Request for Screening Opinion under the Town and Country  
Planning (Environmental Impact Assessment) Regulations 2017**

Proposed redevelopment of the Eastern Business Park  
and redevelopment for new industrial and logistics facilities

At:

Eastern Business Park,  
Eastern Perimeter Road,  
London TW6 2RX

On behalf of:

Heathrow Airport Limited

APL Ref: APL/00342/HAL

June 2023

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## 1.0 Introduction

1.1 We write to request a Screening Opinion of the London Borough of Hillingdon as to whether the redevelopment of the Eastern Business Park requires an Environmental Impact Assessment (EIA). This request for a Screening Opinion is made in accordance with Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations). Our work to inform this request for a Screening Opinion has found that the proposal is not likely to result in significant effects on the environment and, therefore, would not constitute EIA development.

## 2.0 Site and Surroundings

2.1 Eastern Business Park is situated to the south of the Eastern Perimeter Road adjacent to the Northern Perimeter Road roundabout. The site comprises a rectangular-shaped parcel of land measuring 1.65 hectares (shown at figure 1 and Appendix 1).

2.2 The site is currently used for airport-related commercial purposes, with 15 small industrial buildings (each single storey and with a ground floor area of approximately 200sqm) occupying two thirds of the site and four larger commercial buildings on the eastern third (two of which are two storey in height and each with a ground floor area of approximately 400sqm).

2.3 The site is not located within an environmentally sensitive area as defined under Regulation 2(1) of the EIA Regulations. The nearest statutory designation is the Grade II Listed Building known as Heathrow Airport Technical Block A located approximately 200m to the south of the site.

## 3.0 The Proposal

3.1 The development would comprise the demolition of the existing buildings on the site and the redevelopment to provide a logistics park comprising four larger commercial buildings (see Appendix 2 for sketch of the proposed development). Three of the buildings would have a gross external area of circa 1,500sqm each, whilst a fourth building would be slightly larger with a gross external area of 1,725sqm. The total gross internal area of the buildings (which

includes mezzanines) would be circa 8,800sqm. The buildings would be between 10.5-13.5m high.

- 3.2 The redeveloped site would provide for airport related businesses and would be known as Heathrow Logistics Centre East (HLCE).
- 3.3 The proposal has been assessed against Schedules 1 and 2 of the EIA Regulations and is considered to fall under Schedule 2, Part 10 (a) comprising the 'industrial estate development projects', though the development area falls beneath the five hectare threshold.
- 3.4 Projects which are described in the first column of Schedule 2, but which do not exceed the relevant thresholds, or meet the criteria in the second column of the Schedule, or are not at least partly in a sensitive area, are not Schedule 2 development.
- 3.5 To that, it is noted that the development area is 1.65 hectares and does not, therefore, exceed the five hectare threshold given within the second column. The development site would not be situated within a sensitive area, such as a SSSI, National Park or World Heritage Site.

## **4.0 Assessment of the Environmental Effects (Consideration Against EIA Regulations Schedule 3 Selection Criteria)**

- 4.1 Schedule 3 of the EIA Regulations sets out the 'selection criteria' that must be taken into account in the determination of whether or not a Schedule 2 development is likely to give rise to significant impacts on the environment and, therefore, whether or not it would require EIA.
- 4.2 The Schedule 3 selection criteria include:
  1. Characteristics of the development, with particular regard to the size and design of the development, cumulation with other development, the use of natural resources, the production of waste, pollution and nuisances, the risk of major accidents and disasters (including those caused by climate change) and risks to human health;
  2. The environmental sensitivity of the geographical location of the proposed development in the context of:
    - a. The existing and approved land use;

- b. The relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground; and
- c. The absorption capacity of the natural environment, paying attention to specified areas.

3. The likely significant effects on the environment in the context of the criteria set out in (1) and (2) above.

4.3 The following paragraphs set out relevant environmental considerations for the proposal in the context of the Schedule 3 selection criteria summarised above. The conclusion is that the proposal will not lead to any significant environmental effects.

***Traffic***

4.4 The proposed redevelopment and increase in floorspace at the site is forecast to not lead to any worsening of local highway traffic conditions and is expected to reduce movements on the external highway network for the below reasons.

4.5 The site currently provides light industrial units to accommodate businesses that serve Heathrow airport operations only.

4.6 The result of the proposed redevelopment would be to facilitate a greater number of airport related businesses to be located internally within the Heathrow Estate. Once relocated, the existing light industrial vehicles would be redistributed from the external highways network to the internal road network. As such, the number of airport related commercial vehicle movements is likely to stay similar within Heathrow itself and lead to a reduced number of vehicle movements on the external road network.

4.7 For context purposes, a forecast has been undertaken of total vehicle movements associated with the existing use and that following the redevelopment of the site. This forecast is based on TRICS 7 industry standard software. The existing site is forecast to generate an hourly peak movement of up to 23no. two-way vehicle movements, or 223 daily two-way vehicle movements (0700 to 1900 hours). The redeveloped site is forecast to generate an additional 24 and 229 peak hour and daily hour two-way traffic movements, respectively. This would equate to one additional vehicle internally generated within the Heathrow Estate every two and a half minutes in the peak hour. This would be an imperceptible difference and negligible in traffic movements percentage change terms.

### ***Air Quality***

4.8 Local air quality at the site is mainly influenced by emissions from Heathrow Airport, together with road traffic emissions from Eastern Perimeter Road and Northern Perimeter Road. The main pollutants of concern for local air quality are considered to be oxides of nitrogen (NOx), nitrogen dioxide (NO<sub>2</sub>) and fine particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>).

4.9 The site is located within the Hillingdon air quality management area (AQMA) which was declared due to the exceedances of annual mean NO<sub>2</sub> national objective (40µg/m<sup>3</sup>).

4.10 The potential air quality effects arising from the redevelopment will be associated with dust related construction activities and construction and operational road traffic. It is understood that there will be no onsite combustion sources, and further consideration of this is not a requirement.

4.11 For construction, there is likely to be demolition, construction and potential dust generating activities, and exhaust emissions from Non-Road Mobile Machinery (NRMM) associated with the construction of the Proposed Development. With the implementation of recommended mitigation measures following the Institute of Air Quality Management (IAQM) dust guidance<sup>1</sup>, the effects of construction dust and exhaust emissions from NRMM would therefore be negligible, and any significant adverse effects would be avoided, resulting in no residual effects.

4.12 At this stage, the construction programme and method are yet to be determined. However, based on the size of the site (1.65 hectares) and the temporary nature of construction traffic, it is assumed that the traffic generated from the construction phase would not be expected to exceed criteria in IAQM planning guidance<sup>2</sup>. Assuming this, the construction traffic impacts can therefore be considered to not result in any significant effects.

4.13 The IAQM planning guidance criteria thresholds are detailed as:

- A change of Light Duty Vehicle flows of more than 100 annual average daily traffic (AADT) within an AQMA.
- A change of Heavy-Duty Vehicle flows of more than 25 AADT within an AQMA.

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<sup>1</sup> IAQM (2016) Guidance on the assessment of dust from demolition and construction (version 1.1)

<sup>2</sup> IAQM (2017) Land-use Planning & Development Control: Planning for Air Quality (version 1.2)

4.14 As mentioned in paragraph 4.7, the redeveloped site is forecast to generate an additional 229 trips for a typical weekday. The total generated annual average daily traffic calculated from this is 163 AADT. It is anticipated that a proportion of trips will be internal to the Heathrow estate, given the nature of the land use at the site being related to airport operations and its location next to the Control Post providing direct airside access. A conservative estimate of 10% of the trips to be internal is considered reasonable. Of the external trips, it is considered that the split heading towards the M4 (northbound via Eastern Perimeter Rd) and M3 (southbound via Eastern Perimeter Rd) would be equal, given their equal access to the strategic road network. Therefore, it is not anticipated that any road will have an AADT change exceeding the IAQM criteria. Therefore, the operational traffic impacts can be considered to not result in any significant effects. Furthermore, as explained in paragraphs 4.4 to 4.7, the proposed development is expected to reduce movements on the external highway network and therefore may have potential beneficial effects for sensitive receptors (e.g. residents) along the external highway network. However, similarly, these effects would not be expected to be significant.

***Noise and Vibration***

4.15 The area surrounding the proposed development predominantly comprises existing industrial units associated with Heathrow Airport. The noise sensitive receptors are residential properties located approximately 570m to the east on Waye Avenue and approximately 550m to the north on Bath Road from the site boundary.

4.16 The existing noise environment around the noise sensitive receptors has been determined based on The Heathrow Airport 2019 Summer and Noise Action Plan Contours Report<sup>3</sup> and The Department for Environment, Food & Rural Affairs (Defra) strategic noise mapping round 3<sup>4</sup>. The existing noise climate at the noise sensitive receptors are mainly dominated by noise from air traffic associated with Heathrow Airport and road traffic on Bath Road. The existing noise levels at the noise sensitive receptors on Bath Road are estimated to be between 65dB

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<sup>3</sup> Civil Aviation Authority (2022), Heathrow Airport 2021 Summer and Noise Action Plan Contours, ERCD Report 2201, [https://www.heathrow.com/content/dam/heathrow/web/common/documents/company/local-community/noise/reports-and-statistics/reports/noise-action-plan-contours/LHR\\_2021\\_Summer\\_and\\_NAP\\_Contours.pdf](https://www.heathrow.com/content/dam/heathrow/web/common/documents/company/local-community/noise/reports-and-statistics/reports/noise-action-plan-contours/LHR_2021_Summer_and_NAP_Contours.pdf)

<sup>4</sup> Department for environment, Food and Rural Affairs (2019), Noise Action Planning Important Area Round 3 England, <https://environment.data.gov.uk/DefraDataDownload/?Mode=OGCPreview&mapService=https%3A%2F%2Fenvironment.data.gov.uk%2Fspatialdata%2Froad-noise-laeq-16h-england-round-3%2Fwms>

LAeq, 16hr and 70dB LAeq, 16hr during daytime and 55dB LAeq, 8hr and 60dB LAeq, 8hr during night-time respectively. The air traffic noise is likely to be dominant at receptors on Waye Avenue and the existing noise levels are estimated to be between 63dB LAeq, 16hr and 66dB LAeq, 16hr during daytime and 54dB LAeq, 8hr and 57dB LAeq, 8hr during the night-time, respectively.

4.17 At this stage, the construction programme and method are yet to be determined. The following construction activities are considered for potential significant effects:

- Increases in noise levels due to construction activities.
- Changes in road traffic noise levels from construction vehicle movements (mainly on Heavy Goods Vehicles).
- Groundborne vibration disturbance and potential building damage from construction activities.

4.18 Considering that the distance between the site and the receptors is greater than 550m and the relatively high existing noise environment at the receptors, it is unlikely that there will be an increase in noise levels at the receptors due to construction activities and construction traffic. Similarly, no construction vibration significant effect is anticipated, mainly due to the distance separation. At this stage, it is assumed that there are no vibration sensitive industrial facilities located in close proximity to the proposed site such as a data centre or laser equipment etc. No significant construction noise and vibration effects are likely.

4.19 The following potential effects associated with the operation phase are considered:

- Change in road traffic noise levels during the operation.
- Increase in noise levels due to the mechanical service plant.

4.20 Considering the uses of the existing site would remain unchanged with the proposed development, the operational traffic would be similar to the existing traffic flows on the local highways. Therefore, no change in road traffic noise levels is anticipated. The Stage 1 mechanical, electrical and plumbing (MEP) report for proposed redevelopment provides the MEP service concepts, which includes heat pumps and mechanical services with louvres. Although the details of those service plant are not available at this stage, considering the distance separations and high existing noise environment it is unlikely that there will be a change in noise levels at the receptors during the operation.

4.21 No significant noise and vibration effects are anticipated during the construction and operation phases of the proposed development.

### ***Townscape/Landscape and Visual***

#### **Townscape character**

4.22 The site is within the National Character Area (NCA) 115 Thames Valley, within which Heathrow airport is stated to be an urbanising influence of the natural character of the NCA and reduces levels of tranquillity.

4.23 Heathrow airport provides the surrounding context to the site, which is a highly urbanised and industrial townscape, of largely airport-related buildings and highway infrastructure.

4.24 The site comprises a number of one and two storey buildings, the proposed change would be in keeping with the existing use of the site. Though the scale of the development would be higher than the existing buildings, the height of the buildings would be consistent with the proportions of other airport-related buildings to the west and subordinate to those to the south, such as the technical blocks in the British Airways maintenance bases (namely TBJ, TBK, TBA and TBC).

4.25 The construction material used for the commercial premises would be cladding, glazing and metal and, therefore, would not be at odds with any of the surrounding environment.

4.26 No significant townscape character impacts are considered likely from the construction or operation of the proposal.

#### **Visual**

4.27 The development would not be situated adjacent to any designated open spaces, however the publicly accessible London Wildlife Trust, Cranebank Local Nature Reserve (LNR) also known as Huckerby's Meadows, lies along the River Crane valley floor located approximately 350m east of the site. The wildlife site is part of the Crane Corridor Site of Metropolitan Importance for Nature Conservation (SMINC).

4.28 The London Outer Orbital Path (LOOP) bounds the course of the River Crane within the Cranebank Local Nature Reserve. The LOOP is a regionally important walking route, it is located approximately 500m to the east of the site at its closest point.

4.29 It is not considered that there would be significant visual impacts from the wildlife site or from the LOOP, due to intervening woodland, including the vegetation and bunding bounding

the Eastern Perimeter Road, and infrastructure within the airport. Where there may be intermittent longer distance views of the site, this would be seen in the context of the surrounding airport infrastructure.

4.30 There are no nearby residential receptors or other sensitive receptors, including public rights of way users that are considered to receive significant visual impacts. Given the above, no significant visual impacts are considered likely from the construction or operation of the proposal.

#### ***Water Resources, Flood Risk and Drainage***

4.31 The River Crane is located approximately 480m from the eastern boundary of the site. According to the Flood Map for Planning<sup>5</sup>, the site is located in Flood Zone 1; Flood Zone 1 is land assessed as having a low risk of flooding from rivers and the sea, equivalent to a 0.1% Annual Exceedance Probability (AEP), AEP being the probability of an event occurring in any given year.

4.32 According to the Environment Agency's (EA) flood mapping<sup>6</sup>, the majority of the site is at very low risk of surface water flooding with discrete areas of low to high surface water flood risk, isolated in topographical low points on the site, notably existing roads. As the proposed development involves reconfiguring the layout of buildings and roads on the site it is considered that surface water flood risk can be mitigated through careful consideration of finished levels. The EA flood mapping also demonstrates that the site is at very low risk of reservoir flooding.

4.33 There are no historic records of sewer flooding for the site because the drainage directly serving it is part of a private network owned and managed by HAL. The site is not located in a Critical Drainage Area (CDA), defined as a discrete geographical area where multiple and interlinked sources of flood risk cause flooding during severe weather thereby affecting people, property or local infrastructure<sup>7</sup>.

4.34 The existing site is largely covered by building footprint and intermediate areas of hardstanding. The proposed development does not increase the amount of impermeable surface area compared with the existing condition, nor would it result in a change in the

<sup>5</sup> Flood Map for Planning, GOV.UK, Available at: <https://flood-map-for-planning.service.gov.uk/>

<sup>6</sup> Check the long-term flood risk for an area in England, GOV.UK, Available at: <https://www.gov.uk/check-long-term-flood-risk>

<sup>7</sup> Surface Water Management Plan (London Borough of Hillingdon, January 2013)

current land use. Therefore, negligible additional surface water run-off will be generated and negligible new contaminants which could potentially become entrained in surface water run-off and impact on water quality will be introduced.

- 4.35 With respect to surface water drainage, the existing site was developed in the 1950s; therefore, the existing drainage infrastructure onsite is very unlikely to have been designed making allowance for the impact of climate change on the intensity rainfall events and consequently on pluvial flood risk, as is current best practice. The proposed surface water drainage strategy will make allowance for climate change in line with current industry best practice and, as such will deliver a betterment in this aspect. Furthermore, the strategy will include an assessment of the feasibility of Sustainable Drainage Systems (SuDS), which can provide water treatment benefits in addition to runoff rate and/or volume reduction.
- 4.36 With respect to water quality, suitable pollution control measures, for example petrol interceptors, would be incorporated into the design as appropriate to minimise the entry of pollutants into the surface water drainage system. Similarly, during construction, appropriate pollution and sediment control measures would be implemented as required to ensure that contaminative material does not enter the drainage system and/or the watercourse.
- 4.37 The *Groundsure Enviro and Geo Insight* report for the location, dated 16th January 2023, identifies the site as being at moderate risk of groundwater flooding. Historic Ground Investigation (GI) data for the site recorded a water strike at approximately 4m below existing ground level. As the proposed development does not include a basement level, it is anticipated that groundwater would most likely be encountered, if at all, at the construction phase, during the excavations required for the laying of foundations and utilities. It is considered that, if necessary, this can be adequately mitigated such that the residual risk is considered to be low, by firstly verifying the level of the water table with current site-specific GI and subsequently implementing appropriate construction methods, such as dewatering of excavations.
- 4.38 The site is not located in a Source Protection Zone (SPZ), i.e., land designated as requiring protection of groundwater due to its being a public potable water abstraction site, the purpose being to safeguard public drinking water from contamination. Furthermore, the *Groundsure Enviro and Geo Insight* report shows no records of active licensed potable water abstractions (for sites extracting more than 20 cubic metres of water a day) within 2000m of the site, nor are there any records of surface water abstractions within 2000m of the site.

4.39 The increase in floor space in the proposed buildings may result in an increase in potable water demand and subsequently, foul flows from the development. However, this is to be mitigated to some degree by incorporating water-efficient measures, such as low-flow fittings. In addition, rainwater harvesting for irrigation is proposed to minimise potable water consumption. The capacity of the existing potable water and foul sewer networks serving the site will be established, and if necessary, upgrades made to the elements of private and/or public infrastructure impacted.

4.40 In conclusion, no significant effects on the water environment are considered likely during the construction and operation of the proposal.

#### ***Archaeology and Built Heritage***

4.41 The site lies within the Heathrow Archaeological Priority Zone (APZ) (LB Hillingdon) and is located on the gravels of the low-lying Taplow river terrace which have potential for evidence of prehistoric activity. No historic gravel extraction is known within the site boundary, although an extensive area of gravel extraction is recorded directly north of the site. Historic mapping indicates the site was previously in use as undeveloped agricultural fields until the post-war expansion of Heathrow Airport. The area to the north and east of the Northern Runway was initially in use for early passenger terminals which were first army tents, and later replaced by the current buildings located between the northern runway and the Bath Road, near the junction of present-day Northern Perimeter Road and Eastern Perimeter Road. The current buildings on the site were erected in the 1950s. The Historic Landscape Character of the area is considered to be aviation warehousing and maintenance sheds as part of Heathrow Airport. The Grade II listed Technical Block A (NHLE reference: 1298922) was built 1950-55 for BOAC and lies to the south of the site.

4.42 No major excavation is proposed, but foundation work will be required. It is expected that potential archaeological impacts can be managed in accordance with standard practice, such that no significant effects are considered likely during construction. None of these potential impacts will occur operationally.

4.43 The proposal will not result in any direct impacts to the Grade II listed Technical Block A building to the south during construction. The proposal is in keeping with the surrounding environment and, therefore, no significant impacts to its setting are considered likely during construction or operation.

***Ground conditions***

4.44 Depending on the results of desk top studies, these could include recommendations for further work and for design considerations to accommodate the geotechnical conditions and reduce risk from land instability, and any measures that should be adopted to reduce risk to human health and control waters from land contamination if required.

**4.45** It is expected that potential land instability risk and potential risk to human health and control waters from land contamination can be managed in accordance with standard practice, such that no significant effects are considered likely during construction. None of these potential impacts will occur operationally.

***Biodiversity***

4.46 Aerial imagery indicates that there is minimal vegetation within the site and this is limited to amenity grassland around some of the buildings (particularly those in the centre and east of the site) and a hedgerow with trees along the northern boundary within the Eastern Perimeter Road). It is therefore unlikely that the proposal will result in the loss of any important habitat. The nearest area of ecological importance is the Cranebank LNR, a site located approximately 350m to the southeast within the London Borough of Hounslow and designated for a network of flood meadows and oxbow lakes. The LNR sits within the River Crane floodplain, which runs north-south approximately 350m to the east of the site.

4.47 As noted above, air quality and noise impacts during construction are likely to be minimal and short-term. They are therefore unlikely to give rise to any adverse effects on the nearby LNR, River Crane or other ecological receptors in the surrounding area. During operation, small improvements to local air quality and the noise environment are likely, due to the higher specification and performance of the proposed new buildings. However, the broader noise and air quality environment at the site due to its location at the eastern end of Heathrow Airport is likely to mean any benefits of these improvements for ecological receptors will be negligible.

4.48 No significant effects on biodiversity are considered likely from the construction and operation of the proposal.

***Waste***

4.49 The proposal will require demolition of the existing buildings and excavation for the construction of structural foundations, which will be the key waste-generating activities on-site. There is no basement or bulk excavation proposed. General construction waste will be generated during the construction and fit-out works.

4.50 For waste related environmental impacts, the sensitive receptor is considered to be landfill capacity. The loss of natural resources from the disposal of waste, results in permanent adverse environmental impacts and degradation of the natural environment.

4.51 The regions whose landfill capacity has the greatest potential to be affected by inert and non-hazardous waste generated by the proposed development are London, the South-East and the East of England. For hazardous waste generated by the proposed development, landfill capacity in the London and East of England regions have the greatest potential to be affected. The baseline capacity for the affected regions in 2021 was 68.9 million tonnes for inert waste, 49.9 million tonnes for non-hazardous waste and 2.4 million tonnes for hazardous waste.

4.52 The potential for significant environmental effects is determined by considering the scale and nature of impacts within the context of the sensitivity of receptors affected.

4.53 Waste generated by demolition, construction and excavation activities will be minimal in the context of other waste generating activities in the region. Significant opportunities exist for reuse on site of inert material from demolition and excavation works, and these will be pursued where possible. Waste which cannot be reused on site, will be managed in accordance with the Waste Hierarchy within existing waste infrastructure. Policy SI 7 of the London Plan, sets a target to meet or exceed 95% reuse/recycling/recovery of construction and demolition waste. Furthermore, most recent data available, in The UK Statistics on Waste<sup>8</sup>, shows that in 2020, approximately 93% of all construction and demolition waste generated in the England was diverted from landfill. The Proposed Development will perform in line with best practice and the majority of waste will be diverted from landfill.

4.54 There will be no significant waste-generating activities occurring on-site operationally, with waste generation being limited solely to the day-to-day operations of the commercial floorspace.

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<sup>8</sup> Department for Environment, Food and Rural Affairs (2022) UK Statistics on Waste. Available online at: <https://www.gov.uk/government/statistics/uk-waste-data/uk-statistics-on-waste>

4.55 No significant effects from waste are considered likely during the construction phase of the proposal. No significant effects from waste will occur as a result of the operational phase.

***Greenhouse Gas Emissions (GHG)***

4.56 This screening exercise specifically focuses on greenhouse gas (GHG) emissions associated with the proposed redevelopment. It is important to note that GHG emissions are not geographically limited and that all emissions, irrespective of their source, contribute to climate change as the receptor is the global atmosphere. There is no specific GHG emissions threshold which if exceeded is deemed significant enough to trigger an EIA.

4.57 The Institute of Environmental Management and Assessment (IEMA) has published guidance<sup>9</sup> on how to determine significance and states the following:

*“The crux of significance therefore is not whether a project emits GHG emissions, not even the magnitude of GHG emissions alone, but whether it contributes to reducing GHG emissions relative to a comparable baseline consistent with a trajectory towards net zero by 2050”*  
 (IEMA, 2022)<sup>10</sup>

4.58 In other words, significance is determined by evidence / consideration of the following:

- Do the proposed development's GHG emissions align with a net zero trajectory to 2050?
- To what extent does the project align with the latest policy to progress to net zero?
- Evidence that GHG emissions will be managed and reduced over the project's lifetime (e.g. specific design decisions).

4.59 GHG emissions from the proposed development (construction and operation) are expected to have a minor adverse impact that is not significant, and hence screened out. This screening decision is qualitative and based on existing evidence and commitments, but also on the provision that specific mitigation / embedded design measures are committed to and delivered as the project design progresses.

4.60 The GHG screening decision is based on a multitude of factors:

- The new buildings will be more energy efficient, being fully electric and with no gas consumption. In addition, the new development is targeting BREEAM Excellent which

<sup>9</sup> IEMA (2022) Assessing Greenhouse Gas Emissions and Evaluating their Significance, 2<sup>nd</sup> Edition.

<sup>10</sup> The UK has set a legally binding GHG reduction target for 2050 with interim five-yearly carbon budgets which define a trajectory towards net zero. This trajectory aligns with the goals of the Paris Agreement thereby limiting severe climate change adverse effects.

requires a life cycle assessment (which include a GHG assessment of construction and operation) and an improvement of 40% in terms of operational emissions ( $\text{kgCO}_2\text{e}/\text{m}^2$ ) in comparison to a notional building.

- Heathrow Limited has published a Net Zero Plan<sup>11</sup> and a Sustainability Strategy<sup>12</sup>. Both documents set the goal of reducing GHG emissions from surface access transport, supply chain, vehicles, buildings and infrastructure by 45% by 2030. It is assumed that the proposed development falls under the remit of the Net Zero Plan which itself states that the airport must align as close as possible to the net zero trajectory to 2050, but also that investments must be made to reduce GHG emissions as much as possible in order to minimise the volume of 'residual' emissions offset.
- The Net Zero Plan and Sustainability Strategy also discuss activities that Heathrow does not have direct control over but can influence such as surface access emissions. The rate at which passengers and employees shift from car to public transport, or that at which car fleet mix transitions from fuel to hybrid/ electric vehicles will be delivered by the transport sector at a national level. However, the proposed development can facilitate this shift by providing the necessary infrastructure e.g., connections to public transport, electric charging points, etc.

4.61 The IEMA guidance states that during the EIA process commitments in the form of targets do not provide sufficient certainty and that significance should be determined on specific embedded design measures. However, at the screening stage this level of detail is not available. The decision to screen out GHG emissions is based on the strong foundational principles set in the Net Zero Plan and Sustainability Strategy, along with the commitment to achieve BREEAM excellent which should lead to specific low carbon design measures for the proposed development.

#### ***Major Accidents and Disasters***

4.62 At the time of undertaking this EIA Screening, there is no clear definition of the term 'major accident and / or disaster'. Therefore, for the purpose of this EIA Screening, the definitions

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<sup>11</sup> <https://www.heathrow.com/content/dam/heathrow/web/common/documents/company/heathrow-2-0-sustainability/futher-reading/Heathrow%20Net%20Zero%20Plan%20FINAL.pdf>

<sup>12</sup> <https://www.heathrow.com/content/dam/heathrow/web/common/documents/company/heathrow-2-0-sustainability/futher-reading/Heathrow%202.0%20Connecting%20People%20and%20Planet%20FINAL.pdf>

and methodology from the IEMA Major Accidents and Disasters in EIA: A Primer<sup>13</sup> have been adopted.

### **Health and Safety Legislation**

4.63 The proposal is expected to be subject to the Construction (Design and Management) Regulations 2015<sup>14</sup> (CDM Regulations), which seek to drive proper consideration of health, safety and welfare to minimise risk of harm to people that may be involved in the construction of the proposal, or who may use or maintain it operationally. Implementation of the CDM Regulations as well as any other applicable legislation and relevant design standards is considered sufficient to adequately minimise the risk of significant effects that could arise from the vulnerability of the proposal to relevant major accidents and disasters.

### **Major Accidents and Disasters Screening**

4.64 Following review, the proposed development is not considered to be a source of hazard which could result in a major accident and/or disaster nor, were an external major accident and/or disaster to occur, would the presence of the proposed development increase the risk of a significant effect to an environmental receptor.

4.65 However, there are some sources of external hazard which have the potential to make the proposed development vulnerable to a major accident and/or disaster.

4.66 Four Control of Major Accidents and Hazards (COMAH) sites are located within three miles of the proposed development. The site is also located at Heathrow Airport but is located outside the Public Safety Zones (PSZs)<sup>15</sup>. Despite being located outside the PSZs, the proposed development has been designed to be in accordance with Obstacle Limitation Surfaces (OLS) heights to mitigate any risk posed from the site's location near aircraft runways. There are Emergency Evacuation Plans to cover responses to an aircraft crash incident (of which there are 8 categories in the principal emergency plan). These plans will be adopted by the proposed development.

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<sup>13</sup> Major Accidents and Disasters in EIA: A Primer, IEMA, 2020

<https://www.iema.net/resources/blog/2020/09/23/iema-major-accidents-and-disasters-in-eia-primer>

<sup>14</sup> The Construction (Design and Management) Regulations 2015

<https://www.legislation.gov.uk/uksi/2015/51/contents/made>

<sup>15</sup> Heathrow Airport Public Safety Zones (PSZ)s <https://www.heathrow.com/company/team-heathrow/airside/useful-publications/airfield-maps>

4.67 With the mitigation and appropriate emergency plans (identified above) in place, the risk of a major accident and/or disaster is not considered to be increased by the proposed development. Therefore, an EIA is not required in relation to major accidents and/or disasters.

#### ***Socio-Economics***

4.68 Overall, the proposed development will lead to a net increase in employment floorspace.

4.69 The proposal would involve the demolition of both the single storey workshop accommodation occupying two thirds of the site and the single and double storey office suites on the eastern third of the site. This would result in the loss of 32,000 sq. ft. (equivalent 2,9793 sqm) and 15,000 sq. ft. (equivalent 1,394 sqm) of existing employment floorspace (net lettable area) respectively.

4.70 The existing buildings are currently occupied by a mix of tenants associated with airport functions on short-term rolling leases. Therefore, it is anticipated that the site will start to 'ramp down' allowing for reduced disruption to tenants over a reasonable timeframe. No significant adverse effects are anticipated during the construction phase.

4.71 The proposed redevelopment of the site involves the construction of a number of new units with mezzanine floors, totalling circa 8,800 sqm (GIA). The new units would provide flexible new employment floorspace, for example industrial uses with further potential ancillary office accommodation located on the mezzanine floors (subject to tenant demand). It is anticipated that the increase in floorspace across the site will support a net-gain in jobs. Furthermore, the type of employment floorspace is considered to be in-keeping with the location. At operation, it is considered that the proposal would therefore result in a beneficial effect on employment, but this is unlikely to be significant.

#### ***Human Health***

4.72 As noted above, effects on air quality and noise effects during construction are expected to be minimal. Additionally, ground-breaking activities are small-scale and it is expected that any risk to human health from land contamination can be managed through the implementation of best practice measures as required. Standard best practice environmental management measures will be sufficient to manage any potential risk of contamination to water resources during construction. Effects on health from employment opportunities

during construction would be positive but not significant. In this context, no significant effects on human health are considered likely from the construction of the proposal.

4.73 It is possible that slight improvements to local air quality and noise could result at the site during the operational phase of the proposal, due to fewer vehicle movements to and from the site each day. This could have corresponding benefits for human health, however, these would likely be imperceptible. There will be no exposure pathways from any land contamination that may be present to human receptors operationally; therefore, no effects on human health from land contamination during operation of the proposal are expected. Effects on health from employment opportunities during operation would be positive but not significant. In this context, no significant effects on human health are considered likely from the operation of the proposal.

***Cumulative Impacts***

4.74 Consideration has been given as to whether there is potential for likely significant effects to occur through the combination of the proposed development with other existing or approved developments. The majority of approved schemes within the area (to the south of the M4 in Hillingdon and to the west of Hounslow West underground station in Hounslow) are medium to small in size and would not be considered of a scale that would give rise to significant cumulative environmental effects. However, there are a couple of consented larger scale committed developments that were identified for consideration which have greater potential to result in cumulative environmental effects alongside the proposed development. The following committed developments have been identified as having the potential for cumulative environmental effects with the proposed Development:

- Douglas Webb House, 546 Sipson Rd, Sipson, West Drayton UB7 0JB [approx. 2.4km to the north-west]  
 LB Hillingdon - Ref: 11068/APP/2020/1586  
 Redevelopment including the demolition of the existing building and the erection of a new building ranging between 1 and 6 storeys to provide a 302-bedroom hotel (Use Class C1) with basement and ancillary facilities including restaurant, car parking, coach parking, hard and soft landscaping and associated works.
- Airport Bowl, Bath Road, Harlington, UB3 5AL [780m to the north-west]  
 LB Hillingdon - Ref: 38807/APP/2022/1645  
 Erection of new first floor office space to Airport Bowl

- Land at 150-152 Great South-west Road, TW4 6JS [1.5km to the south-east]  
LB Hounslow - Ref: 00504/150-152/P11  
Erection of a self-storage unit (Class B8 use) with associated car and cycle parking and landscaping.
- Land to the south of Bedfont Road, TW19 7LE [3.2km to the south]  
LB Hounslow - Ref: 01660/B/P9  
Demolition of existing buildings and construction of a new warehouse (B1(c)/B2/B8 uses) with ancillary offices, car parking, cycle parking, drainage, landscaping, plant and associated ancillary works including access alterations.

4.75 Due to the nature, scale, and location of the proposed development in relation to the developments listed above, no operational cumulative effects or transboundary effects are anticipated.

4.76 During construction, best practice construction measures would be implemented to ensure that any cumulative construction effects are appropriately managed, should construction programmes overlap. Overall, no likely significant effects are expected during construction.

## 5.0 Assessment Against Screening Criteria

5.1 The proposal has been assessed against Schedules 1 and 2 of the EIA Regulations and is considered to fall under Schedule 2, Part 10 (a), comprising the “industrial estate development projects”, though the development area falls beneath the five hectare threshold.

5.2 The National Planning Practice Guidance (NPPG) sets out guidance on the indicative thresholds for determining whether Schedule 2 development requires an EIA. It considers that EIA is unlikely to be required unless the new development is significantly greater in scale, markedly different in nature or there is high level of contamination. The assessment of environmental effects has shown that the proposal is not likely to result in significant effects on the environment and, therefore, would not require an EIA. However, the NPPG also cites key issues to consider when reaching this conclusion, namely the physical scale of the development and a potential increase in traffic, emissions and noise. Taking each of these points in turn:

- Physical Scale: The site comprises a number of one and two storey commercial buildings, the proposed change would be in keeping with the existing use of the site. Though the scale of the development would be higher than the existing buildings, the height of the buildings would be consistent with the proportions of other airport-related buildings to the west and subordinate to those to the south, such as Vanguard House.
- Traffic: The proposed redevelopment and increase in floorspace at the site is forecast to not lead to any worsening of local highway traffic conditions and is expected to reduce movements on the external highway network
- Emissions: No significant noise and vibration effects are anticipated during the construction and operation phases of the proposed development.
- Noise: No significant air quality effects are anticipated during the construction and operation phases of the proposed development.

5.3 The assessment of the proposal in the context of the selection criteria listed in Schedule 3 of the EIA Regulations confirms that the proposal is not likely to give rise to significant effects on the environment. This follows on from the development area falling significantly below the five hectare threshold, at just 1.65 hectares. We have, therefore, concluded that **an EIA is not required** and request your formal opinion on this matter.

5.4 We trust that the information provided is sufficient to allow the Council to issue its Screening Opinion within the statutory three-week period, however if you require further information or feel that a meeting would be useful, please do not hesitate to contact us.

## Appendix 1: Site Location



## **Appendix 2: Illustrative Sketch of Proposed Development**

