



Bhoseok Nam

Planning Manager
Heathrow Airport
The Compass Centre, Nelson Road
Hounslow, Middlesex, TW6 2GW

Sent via e-mail: bhoseok.nam@heathrow.com

Date: 7th September 2023

Our Ref: 60891/APP/2023/1780

Dear **Bhoseok Nam**

Request for Screening Opinion under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for redevelopment of the Eastern Business Park and redevelopment for new industrial and logistics facilities.

Site Address: EASTERN BUSINESS PARK, EASTERN PERIMETER ROAD HEATHROW AIRPORT

I refer to your Screening Request submission which was received by the Local Planning Authority on 21-06-23. I write to inform you that in the preliminary examination of the screening request (ref: 60891/APP/2023/1780), it was found that the development proposed comprises of "Schedule 2 development" as defined in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. As a consequence, the Local Planning Authority is required to make a determination as to whether an Environmental Impact Assessment (EIA) is necessary.

In this context, a report on the need for an Environmental Impact Assessment in respect of this application has been considered under delegated powers and it has been concluded that an Environmental Statement is **not** required.

Yours sincerely

Planning Specialists

Residents Services

T.01895 558326

ithynne@hillingdon.gov.uk www.hillingdon.gov.uk

London Borough of Hillingdon,
A357, Civic Centre, High Street, Uxbridge, UB8 1UW



INVESTOR IN PEOPLE

R Johnson

Head of Development Management and Building Control
Planning, Regeneration and Environment
Central Services
Hillingdon Council

TOWN AND COUNTRY PLANNING ACT 1990
(Environmental Impact Assessment)
(ENGLAND AND WALES)
Regulations 2017, as amended

SCREENING OPINION Relating to Application No (where applicable):	60891/APP/2023/1780
Location:	EASTERN BUSINESS PARK, EASTERN PERIMETER ROAD HEATHROW AIRPORT
Site area:	1.65 hectares
Description of development:	Redevelopment of the Eastern Business Park and redevelopment for new industrial and logistics facilities

Reason for screening opinion:

The site covers an area of 1.65 hectares. The development falls within Schedule 2, Part 10 (a) comprising the 'industrial estate development'. Development falling within Schedule 2 should normally meet certain thresholds to trigger the need to screen whether EIA is applicable for a development and if a subsequent planning application is necessary and whether it needs to be accompanied by an environmental statement.

EIA is only applicable for developments that have likely significant environmental effects, and it is noted that some developments may be below the prescribed thresholds but still trigger the need for EIA.

National Planning Practice Guidance states:

“...projects listed in Schedule 2 which are located in, or partly in, a sensitive area also need to be screened, even if they are below the thresholds or do not meet the criteria.”

The regulations assist with the identification of sensitive sites, which are generally nationally important locations. The application site is located within the Heathrow Airport boundary which is not defined in the EIA Regulations as a 'sensitive area'. 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.

Determining significance is subjective but in the context of EIA consideration is given to the scale of a development's impact and the sensitivity of the environmental receptor that is impacted; for example, a small scale impact on a highly sensitive

receptor, or a larger impact on less sensitive receptor may result in a determination of likely significant environmental effect. Only effects that are of more than local importance are likely to give rise to likely significant effects.

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

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 an EIA.

i) Characteristics of development

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). 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 10.5-13.5 high.

ii) Cumulation with other development

The following assessment will consider the development as changed or extended, i.e. any impacts associated with the current site along with those introduced through the proposed development.

iii) Use of natural resources *in particular land, soil, water and biodiversity*

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 considered 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.

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.

No significant effects on biodiversity are considered likely from the construction and operation of the proposal, given that the site is not sensitive.

iv) Production of waste:

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 onsite. There is no basement or bulk excavation proposed. General construction waste will be generated during the construction and fit-out works.

For waste related environmental impacts, the sensitive receptor is considered to be landfill capacity. Waste generated by demolition, construction and excavation activities is likely to 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 should be pursued where possible. Waste which cannot be reused on site, should be managed in accordance with the Waste Hierarchy within existing waste infrastructure.

It is unlikely that there will be significant waste-generating activities occurring on-site operationally, with waste generation being limited solely to the day-to-day operations of the commercial floorspace.

Whilst there will be waste produced during construction, where appropriate, this could be controlled by a suitably worded condition securing a waste management plan. No waste would be produced by on-site processes therefore no substantive impact.

v) Pollution and nuisance:

No significant impacts are anticipated in terms of pollution or nuisance.

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

vi) Risk of accidents:

There are not considered to be significant risks associated with the construction and operation.

Health and Safety Legislation

The proposal is expected to be subject to the Construction (Design and Management) Regulations 2015 (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

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.

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.

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). Despite being located outside the PSZs, the proposed development will be 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 should be adopted by the proposed development.

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.

vii) Risks to human health:

There are not considered to be significant risks associated with the construction and operation.

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 should 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.

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.

Location of development

- (a) the existing and approved land use; Airport related commercial activities. The development does not result in or propose a change of use.
- (b) natural resources in the area and its underground; No significant impacts.
- (c) the absorption capacity of the natural environment. The proposal is not considered to raise substantive EIA issues relating to identified criteria.

Types and characteristics of the potential impact

- (a) Extent of impact: Not strategic or substantive in EIA terms. There would be a localised impact only. The potential impacts of the proposal on heritage assets, residential amenity, ecology and highways would be fully assessed during the consideration of any formal planning application.
- (b) The transfrontier nature of the impact: Due to the nature, scale, and location of the proposed development in relation to surrounding developments, no operational cumulative effects are anticipated. The application site is entirely located within the administrative boundary of London Borough of Hillingdon, it is not considered that the proposal would result in any transfrontier impacts.
- (c) Magnitude and complexity of the impact: The impacts are deemed to be of a local extent and of no regional, national or strategic importance.

(d) Probability of the impact: Overall unlikely to be substantive with the impacts being localised. Likely landscape character and visual impacts, including the following other possible impacts:

Historic Impacts-

Within the surrounding area there are designated heritage assets which could potentially have their significance affected by the proposed development. However, the impact is unlikely to be significant on a wider scale in EIA terms.

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.

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.

Despite the site lying with an Archaeological Priority Zone, the Screening Report gives no indication that the Greater London Historic Environment Record has been consulted. Extensive prehistoric and Roman agricultural landscapes are known to have covered the gravels of the Heathrow plateau and have been the subject of extensive archaeological investigations in advance of mineral extraction and airport-related development. However, the Eastern Business Park is relatively small and being previously developed preservation might be expected to be patchy or poor. On that basis it is unlikely to be a "significant effect" in EIA terms.

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

Townscape/Landscape and Visual Impact:

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. 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).

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.

Highways:

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 may lead to a reduced number of vehicle movements on the external road network.

However, where there is the potential for increased traffic generation during the construction phase as compared with the existing use, this could result in localised impact on the highway network. These impacts are not likely to have material impact beyond local importance and therefore not result in likely significant effects.

Ecology and Trees:

There are no sensitive ecological features that would be impacted by the development and consequently there would be no likely significant environmental effects.

Flood risk and drainage:

The River Crane is located approximately 480m from the eastern boundary of the site. According to the Flood Map for Planning5, 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. According to the Environment Agency's (EA) flood mapping, 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 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 current land use. Therefore, negligible additional surface water run-off will be generated and there is a negligible risk associated with water pollution.

Air Quality:

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 (NO2) and fine particulate matter (PM10 and PM2.5). The site is located within the Hillingdon air quality management area (AQMA) which was declared due to the exceedances of annual mean NO2 national objective (40µg/m3). 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.

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 guidance¹, the effects of construction dust and exhaust emissions from NRMM would be expected to be negligible, and any significant adverse effects are likely to be avoided, resulting in no residual effects.

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:

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.

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. 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.

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.

Greenhouse Gas Emissions (GHG)

There is no specific GHG emissions threshold which if exceeded is deemed significant enough to trigger an EIA.

(e) Duration frequency and reversibility of the impact: Not substantive, given likely localised impact and the land is already in operational use as an airport.

It must be noted that whilst the above attributes degrees of magnitude to impacts, this is only in the context of the EIA regulations. Impacts at a local level, even if deemed negligible in the extent of EIA, could give rise to concerns of a degree of significance, with a subsequent planning application that could lead to refusal.

Conclusion and recommendation

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.

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. It is considered in the light of available information that the proposal would not have likely significant environmental effects with impacts of local importance only.

Consequently, the Local Planning Authority considers the proposal screening does not require an Environmental Statement. No further application of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) is required.