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FAO Michael Briginshaw

**BY EMAIL ONLY**

26 October 2026

Dear Michael,

**LAND AT CLOVELLY AVENUE, ICKENHAM**
**FORMAL REQUEST FOR AN ENVIRONMENTAL IMPACT ASSESSMENT SCREENING OPINION**

## 1. Introduction

1.1 On behalf of our client, Welbeck Land ('the applicant'), Marrons formally request a Screening Opinion from London Borough of Hillingdon ('the Council') to determine whether an Environmental Impact Assessment ('EIA') is required for the proposed development at Land at Clovelly Avenue, Ickenham ('the Site') under the terms of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

1.2 In summary, the proposed development falls within Schedule 2 of the EIA Regulations 2017. The overall area of the development exceeds the applicable threshold criteria of 5 hectares (5.4 hectares) which is above the 5-hectare threshold.

1.3 As part of the assessment on whether an EIA is required, we recommend that the Council acknowledges that the Site is just over the 5-hectare threshold and that in practice only around half of the Site is proposed to be developed, as development will be focused within the northern field only. This area (to be developed) equates to less than 3 hectares, which is well below the threshold. In addition, the Site is located within the settlement, in an urban area and is surrounded by existing residential development which taken as a whole will reduce the impact of the scheme.

1.4 This letter provides an overview of key considerations and concludes that an EIA should be screened out for any future planning application at the Site. A Site Location Plan is set out at **Annex 1** of this letter.

## 2. EIA Regulations

2.1 Part 2 of the 2017 EIA Regulations contains the provisions relating to screening. Regulation 6 sets out the details for requests for screening opinions of the relevant

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planning authority, along with details (at Regulation 6(2)) of the materials that must accompany such a request:

*a)* *a plan sufficient to identify the land;*

*b)* *a description of the development, including in particular:*

*i.* *a description of the physical characteristics of the development and, where relevant, any demolition works.*

*ii.* *a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected.*

*c)* *a description of the aspects of the environment likely to be significantly affected by the development.*

*d)* *to the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from:*

*iii.* *the expected residues and emissions and the production of waste, where relevant; and*

*iv.* *the use of natural resources, in particular soil, land, water and biodiversity*

*e)* *Such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment*

2.2 This Screening Letter addresses the above requirements of Regulation 6 of the 2017 EIA Regulations. This is not a planning application, but rather the purpose is to establish whether an Environmental Impact Assessment is required, under the Regulations for the Proposed Development described above.

## 3. Requirement for EIA

3.1 To determine whether the proposed development is EIA development, regard must be had for the EIA Regulations and Planning Practice Guidance ('PPG').

3.2 Section 2 of the Regulations sets out that EIA development means development which is either:

(a) Schedule 1 development; or
(b) Schedule 2 development likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

3.3 EIA is mandatory for developments listed within Schedule 1. In deciding whether a Schedule 2 development is EIA development, Regulation 5(4) states:

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

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

3.4 The PPG sets out that when screening Schedule 2 projects, the LPA must take account of the selection criteria in Schedule 3 of the EIA Regulations.

3.5 The proposed development is not of a type listed in Schedule 1. Accordingly, in order to allow the Council to determine the need for an EIA, this report provides a description of the Site and its surroundings; the proposed development; a review of the EIA Screening Criteria based on the EIA Regulations and the PPG; and a site location plan (**Annex 1**).

***Schedule 1***

3.6 EIA is mandatory for projects listed in Schedule 1 of the EIA Regulations. Schedule 1 developments are large scale projects for which significant effects would be expected and comprise developments such as new airports and power stations.

3.7 The Proposed Development is not a type listed in Schedule 1.

***Schedule 2***

3.8 EIA is discretionary for projects listed in Schedule 2. If a proposed project is listed in the first column and exceeds the relevant thresholds or criteria set out in the second column, the proposal will need to be screened by the Council to determine whether *significant* effects on the environment are likely and thus whether an EIA is required. 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.

3.9 In certain cases, local designations which are not included in the definition of sensitive areas, but which are nonetheless environmentally sensitive, may also be relevant in determining whether an assessment is required. Furthermore, in considering the sensitivity of a particular location, regard should also be had to whether any national or internationally agreed environmental standards (e.g. air quality) are already being approached or exceeded.

3.10 There are, therefore, two matters which fall to be considered. Firstly, whether the development is one listed in the first column of Schedule 2 and one which exceeds the relevant thresholds or criteria set out in the second column and, secondly, whether the development would be located in, or partly in, a sensitive area.

3.11 At the first limb, the proposed development falls within the definition of an "*Infrastructure Project*", comprising an overall area of development which exceeds 5 hectares, satisfying the criteria in 10(b)(iii) of Schedule 2.

3.12 As regards the second limb, Regulation 2(1) of the 2017 EIA Regulations defines a "*sensitive area*" as meaning any of the following:

a) *Land notified under section 28(1) (sites of special scientific interest) of the Wildlife and Countryside Act 1981;*

b) *A National Park within the meaning of the National Parks and Access to the Countryside Act 1949;*

c) *The Broads;*

d) *A property appearing on the World Heritage List kept under article 11(2) of the 1972 UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage;*

e) *A scheduled monument within the meaning of the Ancient Monuments and Archaeological Areas Act 1979;*

f) *An area of outstanding natural beauty designated as such by an order made by Natural England under section 82(1) (areas of outstanding natural beauty) of the Countryside and Rights of Way Act 2000 as confirmed by the Secretary of State;*

g) *A European Site.*

3.13 The Site does not fall within the definition of a "*sensitive area*", as defined by the 2017 EIA Regulations.

3.14 Accordingly, this Screening Letter has been prepared to determine whether the proposed development would be likely to result in significant environmental effects. To meet this requirement, Schedule 3 of the EIA Regulations and the PPG need to be considered.

***Schedule 3***

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

Characteristics

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

- the risks to human health (for example, due to water contamination or air pollution).

Location

- the existing and approved land use;
- the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground; and
- the absorption capacity of the natural environment.

Potential Impact

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

## 4. Site Description

4.1 The Site at Land at Clovelly Avenue is located in Ickenham, in the centre of the London Borough of Hillingdon ('LBH').

4.2 It lies to the south of Clovelly Avenue, to the east of the London Underground Line and to the west of Burnham Avenue.

4.3 The Site is 5.41 hectares (13.4 acres) in size and is rectangular in shape, split into a north field and south field largely comprising semi-improved grassland with patches of bramble. It is undeveloped, topography is flat to gently sloping and a Public Right of Way crosses the Site.

4.4 Existing vegetation generally lines the Site boundaries, and a tree belt splits the north and south fields. The vegetation on the Site is largely unmanaged.

4.5 It is surrounded on three sides (north, east and west) by existing built development (Ickenham) with Long Lane Farm to the south. It therefore has the characteristics of an infill site, especially the north field which is more urban in character.

4.6 Public access to the Site is provided via a Public Right of Way (no. U55) ('PRoW') off Burnham Avenue to the east, which routes diagonally through the Site to a bridge located over the railway line along the western boundary.

4.7 There is existing vehicular access off Clovelly Avenue.

4.8 Ickenham is defined as a Local Centre (within the Local Plan). Ickenham Underground Station is located approximately 0.5km to the northwest and Hillingdon Station is located approximately 2km to the southwest.

4.9 The following planning designations are related to the Site:

- Metropolitan Green Belt – covers the whole Site.
- Ickenham Village Conservation Area – covers the south field.
- Ickenham Manor Farm (scheduled monument) and Ickenham Manor (Grade I listed building) – lies 200m to the east of the south field.
- Air Quality Management Area – covers the whole Site.
- Archaeological Priority Area – covers the whole Site.
- Transport for London Zone of Influence – along western edge of the Site.
- Public Right of Way – crosses the north field of the Site from northeast to southwest.
- Tree Preservation Order – one tree along eastern boundary of the Site (located outside of the Site boundary).

## 5. Proposed Development

5.1 The proposed description of development (for this EIA Screening) is:

> *"Outline planning application (with all matters reserved except for access) for the erection of up to 150 residential dwellings including affordable housing with associated access, public open space, landscaping, sustainable urban drainage systems and associated works."*

5.2 The proposed development will be located within the northern parcel of the Site, leaving the southern parcel undeveloped and as publicly accessible open space. In terms of considering how development at the Site might come forward only, this approach to development at the Site is supported by the Council (as per pre-application meeting held in March 2026).

5.3 The proposed development comprises up to 150 dwellings, including a policy compliant level of affordable housing (to achieve the Golden Rules requirements).

5.4 The case for development would be in accordance with the National Planning Policy Framework ('NPPF') published on 17 August 2026 and it would achieve local planning requirements and other relevant standards.

5.5 New accessible and improved open space and local infrastructure is also proposed (to achieve the Golden Rules requirements).

5.6 In addition, the proposals include landscaping / new planting and enhancement of the existing PRoW to create a new green corridor to encourage walking and cycling with vehicular access at the existing access point off Clovelly Avenue.

5.7 The proposals also include Sustainable Drainage Systems and will achieve biodiversity net gain requirements and other requirements.

## 6. Screening Assessment

6.1 There are no internationally designated sites within the Site. A review of the baseline conditions, mitigation and impacts are set out below in relation to the following considerations:

- Air Quality
- Arboriculture
- Ecology and Biodiversity
- Flood Risk and Drainage
- Land Contamination/ Ground Conditions
- Heritage and Archaeology
- Sustainability and Energy
- Landscape and Visual Impact
- Noise and Vibration
- Highways and Transport

6.2 Should the Council consider any wider considerations are needed to inform its screening assessment, we would be happy to supplement the detail provided as necessary.

6.3 Each is discussed in turn overleaf.

**Air Quality**

Baseline

6.4 Monitoring undertaken by the London Borough of Hillingdon indicates that nitrogen dioxide concentrations in the local area are below Air Quality Objectives, however, in 2003 LBH declared an Air Quality Management Areas ('AQMAs') due to exceedance of the NO2 annual mean objective of 40µgm-3. The site is in the AQMA which covers all the borough south of the Chiltern-Marylebone railway line.

Mitigation

6.5 All practical and reasonable measures which can be implemented to mitigate any detrimental impacts associated with construction and operation of the proposed scheme will be considered and highlighted within the Air Quality report.

6.6 In order to avoid significant effects during the construction phase, best practice measures will be implemented through a Construction Environment Management Plan ('CEMP') which would be secured via an appropriately worded planning condition.

6.7 In addition, a Construction Dust Risk Assessment will determine any dust control measures required during the construction phase. During the operational phase, any road vehicle emissions are expected to be negligible as the proposed development forms part of the settlement and is surrounded by built-up development, primarily in residential use.

Impacts

6.8 The implementation of site-specific dust control measures as part of a CEMP would ensure construction phase impacts are not significant.

6.9 A road traffic dispersion modelling assessment is expected to demonstrate that all operational phase additional vehicle emission impacts would not be significant.

6.10 Site odour and dust surveys and impact assessments are expected to demonstrate that impacts on any proposed sensitive receptors would not be significant. It is not considered that measures will be required to mitigate existing sensitive receptors from additional road traffic emissions generated by the development during the operational phase.

**Arboriculture**

Baseline

6.11 A British Standard 5837:2012 tree survey has been undertaken and will be used to inform the proposed development and to determine the arboricultural effect. The tree survey provides a record for all trees, hedgerows and areas of scrub which are within influence of the application area, making a distinction between 79no. individual trees and 17no. groups of trees/ scrub. The tree stock varies in condition and quality, with the Site's principal trees comprising a number of mature English Oak standards which are set within lapsed agricultural boundaries.

6.12 There is a single oak tree which is scheduled within a Tree Preservation Order ('TPO'), albeit tree cover within the southern proportion of the site is also protected by way of inclusion within the Ickenham Village Conservation Area.

Mitigation

6.13 Given the Site's current agricultural usage, the established tree cover is focussed throughout Site boundaries where they can be readily retained as part of a scheme of development. Therefore, subject to the ongoing sensitive design, any effect on high or moderate quality, or protected tree cover, is likely to be avoidable.

6.14 Any proposed tree removals or tree works will be focussed on unremarkable components of the Site's tree stock, wherein the arboricultural effects are expected to be low or transient, and where impacts could be addressed onsite through appropriate mitigation. Mitigation requirements for low quality tree/scrub removal are likely to overlap with Biodiversity Net Gain requirements, wherein there will be focus throughout design to ensure that suitable planting and new habitat creation will be incorporated as part of the development. As a result, Arboriculture should be considered as per standard industry guidance, and local policy expectations, and addressed by way of an Arboricultural Impact Assessment and preliminary Tree Protection Strategy, with further work secured by condition (if required). On this basis, Arboriculture can be scoped out and is not a topic that would need to be considered as part of an EIA application.

Impact

6.15 On the basis that the above mitigation measures are incorporated into the scheme (including the retention and protection of higher-value trees, appropriate separation from retained canopies and RPAs, and implementation of a Tree Protection Plan) any adverse impacts on the existing trees will be minimised and can be managed through Arboricultural Method Statements. As such, no significant impacts relating to arboriculture are anticipated.

**Ecology and Biodiversity**

Baseline

6.17 The Site comprises two fields dominated by tussocky species-poor grassland, bordered by linear scrub dominated by bramble and blackthorn. Lines of mature and semi-mature trees also present along the western boundary as well as the central divide between the two fields, and largely comprise ash, oak and sycamore trees. Lowland mixed deciduous woodland borders the east and west of the southern field and extends offsite.

6.18 The Site does not form part of a statutory designation. Three international designations are present within 15km: Southwest London Waterbodies Ramsar and Special Protection Areas ('SPAs') 11km south-west and Burnham Beeches Special Area of Conservation ('SAC') 12.2km west; and a single national designation is present within 2km: Yeading Woods Local Nature Reserve ('LNR') 1.53km south-east. The Site does not form part of a non-statutory designation, however, Ickenham Moat, a Site of Importance for Nature Conservation ('SINC') is located adjacent to the south-eastern boundary of the site.

6.19 Reptile surveys in September and early October recorded low numbers of slow worm on Site, and bat activity surveys undertaken across the Site between April and October found very low levels of bat activity and were largely limited to common and soprano pipistrelle bats. A number of trees were also found to have potential roost features for bats, and a suspected badger sett is also present in the south-east of the Site. Grassland on site was too tall to be of value to ground nesting birds; however, boundary scrub and trees do provide suitable nesting habitat.

Mitigation

6.20 The development has been designed to ensure a suitable buffer between any development and Ickenham Moat SINC and appropriate SuDS and pollution control measures will be put in place, to avoid any effects on the hydrology of the SINC.

6.21 Priority woodland habitat which borders the east and western boundaries of the southern field, as well as boundary scrub and trees will be retained and buffered from development and maintained in the long term for biodiversity. The only exception to this is the low value and patchy bramble and blackthorn scrub along the eastern and northern boundaries of the northern field. Due to the loss of grassland in the northern field, there will be an unavoidable loss of grassland habitat on Site and an overall net-gain in biodiversity will unlikely be achieved on Site. However, to mitigate any loss, much of the southern field will be uplifted to a more species-rich wildflower grassland, and where possible grass verges and small green areas will comprise flowering lawns. Extensive tree and native shrub planting are proposed throughout the Site. This will result in a much greater diversity of habitats on Site and any deficit in overall biodiversity value will be offset through the purchase of units from a local habitat bank, to ensure a +10% net-gain.

6.22 Slow worm will be carefully translocated to enhanced habitat within the southern field prior to development.

6.23 The scheme has been designed to retain the vegetated borders of the southern field and the western boundary of the northern field, thereby ensuring a continuous green corridor across the Site for bats post development. A sensitive lighting strategy will be utilised to further avoid impacts on bats and the creation of flower-rich habitat and tree planting will create valuable new foraging habitat post development, and bat boxes can also be established throughout. Trees with high potential to support roosting bats will be retained and protected within the scheme subject to measures to ensure safety of the public such as fencing off dangerous trees and conducting careful crown reduction, where needed to reduce risk of trees collapsing.

6.24 The development retains the majority of nesting bird habitat, and the areas to be removed will be done so sensitively outside the nesting bird season. Furthermore, birdboxes can be incorporated throughout the scheme.

6.25 The development has been designed to ensure a 30m buffer between the suspected badger sett and any excavations.

Impact

6.26 Due to the distance of these sites and the size of the scheme, no significant impacts are anticipated on any statutory nature designations in the wider surrounding area.

6.27 On the basis that the above mitigation measures will be incorporated into the scheme, no significant impacts relating to ecology are anticipated.

## Flood Risk and Drainage

Baseline

6.28 The Site is located in Flood Zone 1, at very low risk of flooding from rivers and sea. The Site is not at risk of flooding from reservoirs and not indicated to be susceptible to groundwater flooding. There are no records of flooding occurring on the site. The Gov.uk Flood Map for Planning – Surface Water Spatial Planning Extents shows where areas could potentially be susceptible to surface water flooding in an extreme rainfall event. The Surface Water map, including climate change, indicates that the majority of the site is at very low risk of surface water flooding. There are areas of elevated surface water flood risk associated with low points and overland flow routes from adjacent existing hard standing areas which range from Low to High risk.

6.29 To provide a more accurate assessment, site-specific surface water modelling has been undertaken using detailed topographical survey data. The results indicate a reduction in surface water flood extents within the central area of the Site and along the western boundary. There are small areas of shallow surface water flooding identified within parts of the proposed development area. The total affected flood volume will be mitigated within the proposed surface water drainage network and attenuation basin.

Mitigation

6.30 Good construction practices should be adopted by way of a Construction Environmental Management Plan ('CEMP') which can be secured by a appropriately worded condition. This should seek to prevent pollutants entering the drainage system of discharging directly to the ground.

6.31 The drainage strategy incorporates an attenuation basin sized to accommodate runoff from up to the 1 in 100-year plus 40% climate change event and 10% urban creep, with discharge restricted to the 1-year greenfield runoff rate. Flow from the basin is conveyed via a pumped outfall into the ditch along the southern boundary. As part of the wider SuDS strategy, permeable paving and bioretention are also proposed to deliver effective source control and provide additional water quality benefits through filtration and sedimentation.

6.32 The attenuation basin, swale, diffuse outfall and bioretention areas will manage peak flows on-site and will limit discharge rates to pre-development conditions.

Impact

6.33 It is assumed that the proposals will not have a negative impact in terms of flood risk and drainage following the implementation of suitable mitigation measures. The application will be supported by a Flood Risk and Drainage Strategy report which will detail how the proposed development will not increase to flood risk on the site or elsewhere.

**Land Contamination/ Ground Conditions**

Baseline

6.34 The Site is underlain by bedrock geology of London Clay Formation – Clay, Silt and Sand. There are no recorded superficial deposits on Site. There are no geological faults present on the Site. The Site has a low pollutant speed, and it is underlain by an unproductive bedrock aquifer. There are no recorded boreholes on Site. The potential for collapsible and compressible ground stability hazards on Site are indicated to be very low and no hazard respectively. The potential for ground dissolution hazards is indicated to present no hazard on Site. There is a very low risk of damage to properties from landslides, and from running sand ground stability hazards. The potential for shrinking or swelling clay ground stability hazards on Site is indicated to be low.

6.35 The Site is not underlain by a superficial aquifer. The Site is not located within a Source Protection Zone, or Nitrate Vulnerable Zone. There are no Areas of Outstanding Natural Beauty, Sites of Special Scientific Interest, or BGS recorded mineral sites located on Site or within a 1000m radius. There are no coal mining or non-coal mining areas, or natural cavities, located on Site or within a 1000m radius. There have been no recorded pollution incidents, discharge consents, or water abstraction permits on Site. There are no Local Authority Pollution Prevention and Controls recorded on Site. There are no recorded historic landfill or registered landfill sites on Site.

6.36 The concentrations of arsenic, cadmium, chromium, lead and nickel in the Site are within satisfactory concentrations for the Site's intended use. The Site is located within a low probability radon area.

Mitigation

6.37 Potential mitigation measures may include:

- In order to further limit disturbance, the site access tracks could be constructed first to allow movement of vehicles around the Site on areas of soft-standing;
- Any vegetation, topsoil, and subsoil could be removed to expose a suitable sub-grade;
- Surface water, perched waters or groundwater from dewatering operations should not be discharged to surface water bodies, foul or surface water drains without the appropriate consents from the local water or sewage company and/or the Environment Agency. The disposal of this effluent would be the responsibility of the contractor;
- Foundations and underground pipelines would be designed so as not to present a preferential pathway for contaminant migration, if present at the Proposed Development;
- Contaminated ground materials that cannot be re-used will be suitably managed to prevent mobilisation to the environment and to minimise the potential to impact sensitive receptors, prior to disposal.

6.38 A CEMP should be produced to set out the principles of contaminated land mitigation. Examples of outline measures that could be included and expanded upon within the CEMP include:

- General good construction working practices such as dust suppression, windbreak netting around excavations and/or perimeter fencing, covering stockpiling with tarpaulins and road sweeping to prevent local residents in the vicinity of the earthworks from being exposed to windblown dusts, vapours and asbestos fibres.
- The CEMP should describe suitable contaminant measures and procedures for the storage and handling of materials and wastes, to ensure any spills or contaminant releases do not enter the ground or surface water courses in line with relevant regulations and good practice guidance.

Impact

6.39 Following the implementation of sufficient mitigation measures, there would be no significant adverse impacts in terms of land contamination and ground conditions.

**Heritage and Archaeology**

Baseline

6.40 The Site does not contain any statutorily listed buildings; however, the southern field lies within Ickenham Village Conservation Area ('IVCA') and is adjacent to the Ickenham Farm Moated Site Scheduled Monument (NHLEref.. 1002006).

6.41 There are a number of Grade I and Grade II listed buildings and locally listed buildings within 1km of the Site including Ickenham Manor (Grade I), the Garden Walls to East of Manor Farmhouse (Grade II), Swakeleys House (Grade I), Outbuildings to North of Swakeleys (Grade I), Long Lane Cottages (Grade II), the Douay Martyrs School (local) and Glebe and Manor View Villas (local). The vast majority of such built heritage assets however have no potential to be affected by the proposed development as a result of intervening distance and existing built development. It is considered that for Built Heritage matters, only the Ickenham Conservation Area has the potential to be affected by the proposed development.

6.42 Ickenham Manor Farm moated site Scheduled Monument is located to the immediate east of the Site's southern field. The Scheduled Monument comprises the site of a moated manor house of Medieval origin that was once the manor of Ickenham and its origins can be traced back to three Saxon period landholdings. The moat ditch lies parallel to the eastern boundary of the Site's southern field. The moat ditch is not visible when standing anywhere within the southern field due to an impenetrable boarder of brambles. Due to the extensive vegetation, it is not possible to appreciate or experience the historical and archaeological interest of the Medieval moated site when standing within the Site.

6.43 In terms of below ground archaeological remains, geophysical surveying of the Site did not record any anomalies that suggest occupation dating to any past periods of human history.

Mitigation

6.44 The proposed built development would be located within the northern field of the Site only with the southern field retained for open space. The north field is outside of the IVCA and extant screening between this field and the south field, within the IVCA, would be retained and increased to limit intervisibility between them. The north field is positioned "deeper" within the village and its proximity to residential and other development subsumes it into this environment.

6.45 Increased noise levels associated with vehicle movement are expected to be minimal and 'muffled' due to the extant and bolstered vegetation dividing the fields. The southern field is to be retained as public land. An attenuation pond is proposed within the south-eastern part of the southern field. Careful design and use of materials would ensure that minimum modification is made to this area.

6.46 Given the proximity of the proposed built form to the moat ditch, particularly within the south-eastern corner of the northern field, the proposed development layout, scale, design and massing of built development and treatment will be carefully designed in this area to limit any impacts on the setting of the monument.

6.47 Evaluation trenching will be undertaken to establish presence/absence and significance of any archaeological remains prior to the determination of any planning application. Any archaeological remains identified will be excavated and recorded prior to development in accordance with an appropriately worded planning condition.

6.48 Design measures will be incorporated into the scheme that would protect and maintain the integrity of the archaeology and promote access for recreation, education and interpretation. These measures could include:

- Removing vegetation along the edge of the moat ditch making it more visible whilst reducing root growth which causes damage to archaeology.
- Improve physical access by creating paths close to the monument.
- Provide an interpretation board to enhance the visitor experience.

6.49 In addition, a methodology for the protection of the Scheduled Monument and the IVCA during construction will be set out in a CEMP secured by an appropriately worded planning condition.

Impact

6.50 In terms of potential Built Heritage impacts, the proposed development represents a limited change within, and to the setting of, one part of the Ickenham Conservation Area, comprising the projecting eastern extremity of that designation. The proposed development includes embedded design measures to reduce and avoid potential harms insofar as possible. Any remaining impacts to the Ickenham Conservation Area would be very limited, falling well below the threshold of a 'significant' effect in EIA terms.

6.51 The on-site fieldwork for the pre-determination evaluation trenching has been completed. The investigations were monitored by the Greater London Archaeological Advisory Service (GLAAS). No archaeological remains were recorded in the fourteen trenches excavated. Based on these findings the proposed development will not impact any archaeological remains associated with the adjacent Scheduled Monument. Given the absence of any remains there will be no "significant" effect on archaeology in EIA terms.

**Sustainability and Energy**

Baseline

6.52 The Site lies in an Air Quality Management Area, meaning that it experiences high levels of congestion.

6.53 No existing low-carbon, digital, or sustainability related infrastructure is present within the Site, meaning sustainability improvements must be embedded within the development scheme rather than relying on existing infrastructure.

Mitigation

6.54 Mitigation measures focus on reducing carbon emissions, encouraging sustainable mobility, and protecting environmental quality, both during construction and post completion. These include the following:

- Air-quality-neutral measures, modal shift strategies and EV charging at every home to promote sustainable modes of travel and reduce reliance on ICE car trips;
- SuDS incorporated into open space, managing surface water close to source and protecting downstream flood risk;
- Retention of boundary vegetation, offsetting unavoidable tree losses, and securing measurable BNG through new planting, habitat creation, and long-term management, to reduce the environmental impact of the development; and
- A Construction Waste Management Plan will be adhered to, ensuring appropriate handling, reuse, recycling, and disposal of materials during the construction process.

6.55 The following measures can be implemented at both the individual unit and site scale, to make the development energy and resource efficient, low carbon, and promote sustainable living. It is considered that there are a range of technically feasible low carbon or renewable energy systems that could be incorporated into the proposed development.

6.56 Per unit measures could include:

- All electric homes – in line with the Future Homes Standards, and the phasing out of gas for heating. Air source heat pumps are an option, which are much more efficient than gas boilers, and are promoted in the London Plan and Hillingdon Council Strategic Climate Action Plan.
- Rooftop Solar Power Systems, or Rooftop PV Systems and batteries – can reduce grid reliance, and can be tailored to individual household designs.
- Enhanced water efficiency – the development is designed to achieve greenfield runoff rates, and surface water runoff will be managed as close to source as possible. The development proposal includes a detailed Flood Risk Assessment and Drainage Strategy.
- Sustainable waste management – dedicated waste storage areas will be provided at each property, along with bin storage areas, to encourage participation in reuse, recycling, and correct disposal of waste.

6.57 Site wide measures could include:

- An interconnected travel network, providing four access points, enhanced Public Right of Way routes, and cycle/pedestrian connectivity to Burnham

Avenue, Clovelly Avenue, and the nearby underground station, as well as strong links to the centre of Ickenham and beyond.

- Retention and enhancement of green infrastructure – The development includes a large amount of amenity space, open green space, play areas, and tree planting. 10% BNG will be met or exceeded, in line with the Environment Act 2021 (and will be provided off-site if required).
- Improved digital connectivity – ensuring infrastructural provision for full-fibre broadband, in line with Hillingdon's Digital Strategy and the London Plan.

6.58 As part of an outline application, a draft Residential Travel Plan promoting a range of sustainable travel measures and targets, which encourage sustainable methods of travel will be submitted.

Impact

6.59 The proposed development presents an opportunity for sustainable improvements to be integrated throughout the project, meeting both national and local standards for green infrastructure, sustainable travel, and carbon reduction.

6.60 The development can follow guidance from the NPPF, Net Zero Strategy, and Future Homes Standards to plan positively for the increased supply and use of renewable/low carbon infrastructure, through per unit measures.

6.61 The development will be supported through local policies like the Hillingdon Council Climate Action Plan, and London Plan, which encourage the use of sustainable, energy efficiency, and carbon reduction measures, for major developments.

6.62 Following the implementation of sufficient sustainability measures, it is considered that the utilised measures would not cause adverse impacts, and the Site can provide a number of environmental and social benefits both throughout the project and post completion.

**Landscape and Visual Impact**

Baseline

6.63 The Site and surrounding area are not subject to any local or national landscape designation on account of its quality or scenic value (e.g. a National Landscape or an Area of High Landscape Value).

6.64 The Site comprises two fields of semi-improved grassland with patches of bramble. Scrub with intermittent trees (including mature oaks) typically line field boundaries but sections of site boundary that abut the existing urban area (defined by rear garden fencing) are devoid of vegetation in places. The Site vegetation is largely unmanaged. One particularly fine oak tree lies in one of the gardens alongside the eastern site boundary. Public Footpath no. U55 crosses the site to connect Burnham Avenue with a private track close to the southern and western site boundaries.

6.65 The Site has a strong sense of enclosure, imparted by the site boundary tree/shrub belts and by surrounding built development. The northern field is subject to the urbanising influences of this existing housing. The southern field has a much stronger rural character with glimpsed views an agricultural landscape further to the south. The Hillingdon Landscape Character Assessment (May 2012) identifies that the Site forms part of the Interwar Suburb/Metroland Townscape Character Type whilst the agricultural land on the southern side of the site forms part of the Yealding Brook River Corridor Landscape Character Area (LCA G3).

6.66 The site is visually well contained by peripheral housing and tree/shrub vegetation. It does not form a component of any middle or long distance views. Views of the northern field are available from Public Footpath no. U55 and from housing that abuts this field on its northern and eastern sides. Some residential views (mostly upper rear floors and rear gardens) are open whilst others are partially enclosed (summer months) or filtered (winter months) by site boundary vegetation. Glimpsed views from the railway are obtained through tree/shrub vegetation. A line of mature trees along the western edge of the northern field forms part of the well-vegetated backdrop to views from housing and the Douay Martyrs School on the far side of the railway. Filtered views of the southern field are available from Public Footpath no. U55, from the school playing fields and from the private track close to its southern and western boundaries. Site views from Ickenham Manor to the east are substantially enclosed by combined effects of garden and site boundary vegetation.

Mitigation

6.67 In order to avoid significant effects during the construction phase, best practice measures will be implemented through a Construction Environment Management Plan (CEMP) which would be secured via an appropriately worded planning condition.

6.68 During operation, existing site vegetation should be substantially retained, and new housing would be restricted to the northern field where it would physically and visually relate to the existing urban area. The southern field would be developed as a new publicly accessible greenspace for existing and future residents, incorporating sustainable drainage, supplementary tree/shrub planting, ecological

enhancements and a new informal footpath network. The existing public footpath would be retained along its existing alignment. Housing would be set back from the footpath and new tree/shrub vegetation provided along the route to conserve the visual amenity of footpath users. Retained and supplementary vegetation would soften the appearance of the new built form. The tree/shrub belt between the two fields would be reinforced to deliver a robust vegetation belt along the expanded urban edge.

Impact

6.69 In terms of landscape impact, there would be no material changes to landform other than localised re-grading to achieve development platforms and low-key excavations for sustainable drainage basins. Existing vegetation would be substantially retained.

6.70 Existing fields with an urban setting would be developed for new housing and recreational greenspace. The new built form would have a strong visual and physical relationship with the existing settlement edge. The new housing would be located on a site that has a strong sense of enclosure and urban influence in character terms. The new housing area would comprise up to 150 dwellings and would relate well with the existing settlement edge in terms of height, scale, massing and typologies. It would not extend into the adjacent and relatively open Yealding Brook River Corridor LCA.

6.71 There would be a high level of change to the character of existing views from the section of Public Footpath no. U55 across the northern field and from the residential properties that abut this field. Open views of a grass field would, where available, be replaced by more enclosed views of new housing and well-vegetated greenspace.

6.72 In terms of visual impact, the proposed housing would be located in the visually well contained northern field, and housing would reflect the height, scale, massing and typologies of the surrounding urban area. The new built form would be set within a strong framework of (a) existing housing to the west, north and east and (b) existing and proposed tree/shrub vegetation to the south. It would not result in any significant characterising effect on the character of the southern field or the agricultural landscape located further to the south in the context this existing built form and the enclosure provided by this existing and proposed vegetation.

6.73 The numbers of visual receptors potentially affected by the proposed development are likely to be low. They would be predominantly limited to users of the Public Footpath no. U55 and occupants of housing that abut the northern and eastern site boundaries. A Landscape and Visual Impact Assessment will be submitted as part of the planning application.

6.74 In summary, the location, height, scale and massing of the proposed housing would be sympathetic to local landscape character and views. Significant effects are not anticipated.

**Noise and Vibration**

Baseline

6.75 SoundPlan noise Contour Reports will be prepared in relation to all the measured and predicted noise sources for the site. This will inform Client and Planning Team with respect to the rail and road impacts and the physical protection provided by any local site ground topography and or man-made physical bunds, barriers or screening (including intra-site screening of the layout) to predict site sound pressure levels and identify the magnitude of the noise impact on the proposed development.

6.76 The report will identify whether dwellings which are closest to the railway should be designed to utilise appropriate glazing and attenuating ventilation and will consider internal room noise levels.

6.77 Preparation of a Noise Report referencing the baseline noise levels on site, introducing the findings of the acoustic model of the proposed residential scheme, identification of any significant noise impacts and advising on appropriate mitigation in line with current British Standards, Local Authority planning requirements and other appropriate guidance.

Mitigation

6.78 The railway will have more impact than the areas adjacent to existing residential areas or agricultural fields unless or until those fields are developed when the cumulative impacts will be likely to increase but due to the nature of construction, will be temporary and in the long term insignificant.

6.79 The railway is likely to require attenuation measures to provide acceptable residential internal and external noise conditions. It is likely that a noise barrier alongside the railway should be considered to shield the new homes and open spaces. Such a barrier could also offer reduced noise exposure. However, if this is impractical the juxtaposition of the proposed buildings will provide mitigation to internal and external noise levels.

Impact

6.80 During construction there will potentially be noise impacts from construction equipment and activities within the Site and outside the Site along the construction traffic route. Any potential impacts will be minimised by using Best Practicable Means which will be implemented through the Construction Environmental Management Plan and significant effects are not considered likely.

6.81 Once the development is complete, potential noise impacts will predominately be from motor vehicles on the local highway network and to a lesser extent, general domestic activities. All reasonable measures will be employed to minimise potential impacts from additional cars using Clovelly Avenue and Glebe Avenue. However, due to the quantum of development, it is highly unlikely that there would be significant effects due to development generated traffic.

**Highways and Transport**

Baseline

6.82 The Site is well served by pedestrian and cyclist infrastructure and is surrounded by a network of high-quality footways provided on surrounding residential streets. This includes PRoW No. U55, which traverses east-west across the site, connecting Burnham Avenue to a shared access road that links to Long Lane.

6.83 The closest bus stops to the site are the Douay Martyrs School Bus stops, located some 250m – 400m to the west of the site on Long Lane. Further bus stops are also found along Long Lane including the Swakeleys Drive Bus Stop. A bus stop is also found north of the site on Glebe Avenue, adjacent to the Ickenham Underground Station. The nearest bus stops are served by bus route numbers U10 and 278, which together provide connections between Heathrow, Uxbridge and Ruislip via Hillingdon.

6.84 Ickenham Underground Station is located approximately 500m to the north of the site off Glebe Avenue. The station is served by the Metropolitan and Piccadilly lines. West Ruislip Railway Station is also located c. 2.6km to the north of the site, and provides services to High Wycombe and London Marylebone.

6.85 Transport for London's Public Transport Accessibility Level (PTAL) for the site is 2, which is classed as 'poor' on the PTAL assessment scale.

6.86 The Department for Transport's connectivity score for the site is 75, which is within Local Authority Band 'C' for Hillingdon (the top 30%) and therefore represents one of the most sustainable locations within the Borough.

*Clovelly Avenue*

6.87 Clovelly Avenue is a residential cul-de-sac, providing access to approximately 58 dwellings. The road is subject to a 30mph speed limit and comprises a single carriageway street with a typical carriageway width of 5.5m. The street is very lightly trafficked, accommodating c. 40 two-way vehicle during the traditional network peak periods and c. 415 two-way movements over the course of a typical weekday.

6.88 The existing width is sufficient to enable two HGVs to carefully pass one another[1] and also exceeds the minimum street width of 5m, allowing a refuse vehicle to pass a parked car[2].

6.89 Clovelly Avenue forms part of a controlled parking zone, with a permit scheme for residents. Car parking is provided in the form of intermittently marked out 2.1m wide parking bays along the length of Clovelly Avenue, which are positioned half-on the carriageway; half-on the footway. In some locations, two car parking bays are positioned opposite one another. When this occurs, the effective width of Clovelly Avenue reduces to between 3.1m and 3.5m. Notwithstanding this, inter-visibility

[1] Figure 7.1 of Manual for Streets

[2] Manual for Streets paragraph 6.8.7

along Clovelly Avenue is good and car drivers are therefore afforded adequate opportunities to see one another prior to meeting. This ensures that, in the unlikely event two vehicles meet along Clovelly Avenue, approaching drives can safely give-way to one another.

6.90 At its eastern extent, Clovelly Avenue forms the minor arms of a simple priority junction with Glebe Avenue. Visibility at the junction is good, with site observations suggesting that visibility splays in excess of the requirement for a 20mph street can be achieved in either direction.

*Glebe Avenue*

6.91 Within the vicinity of the site Glebe Avenue is a single carriageway, two-way street that is subject to a 20mph speed limit. The street is some 6m in width and accommodates street lit footways on either side of the carriageway.

6.92 Glebe Avenue is frequented by minor residential street access junctions along its length, and to the northwest forms a route towards Ickenham village centre and the wider highway network via its junctions with Long Lane and the B467.

*Long Lane*

6.93 Long Lane is subject to a 30mph speed limit, is c. 9m wide and forms the main arterial route through Ickenham. To the northeast, it forms a route towards Ruislip, whilst the south forms a route to Hillingdon and the A40.

6.94 Long Lane accommodates footways on either side of the carriageway, including segregated provision on its northern side.

Mitigation

6.95 To avoid significant effects during the construction phase, best practice measures will be implemented through a Construction Traffic Management Plan (CTMP). The CTMP will control:

- The routing of construction vehicles to keep them away from sensitive links, e.g., congested junctions, roads that are unsuitable to accommodate large vehicles and the centre of settlements;
- The timing of deliveries, particularly those by vehicles to avoid sensitive periods, e.g., school drop-off and pick-up times;
- Potentially the size of vehicles that can be used at particular times of the day.
- Provision for parking and turning, and holding, of construction vehicles on-site;
- Provision for parking for contractors vehicles;
- Measures to prevent mud from being deposited on the highway (i.e. wheel wash facilities); and
- Measures and monitoring regimes to ensure the CTMP is complied with.

6.96 Mitigation measures for the operation phase will include the following:

- Potential off-site pedestrian improvements along the routes to key local facilities and services.;

- Upgrades to Public Right of Way footpath No. U55 within the site boundary potentially including an all-year-round surface, a sensitive lighting scheme, and pedestrian wayfinding (i.e. signage);
- On-site Travel Plan; and
- Potential financial contribution towards bus service improvements and associated infrastructure.

6.97 The IEMA Guidelines outline significance thresholds above which the environmental impacts of traffic are likely to result in significant effects. For all criteria, the impact of the development is likely to fall comfortably below these.

Impact

6.98 As a result of the proposed mitigation strategy, the impact of the Proposed Development will be negligible and further assessment of the environmental effects of the Proposed Development is not required under IEMA Guidelines.

**Consideration of Cumulative Effects**

6.100 Schedule 4 of the EIA Regulations requires consideration of a proposed development cumulatively with other existing and/or approved projects. Guidance on the consideration of cumulative effects in the EIA screening process is set out in the PPG (Paragraph: 024 Reference ID: 4-024-20170728), which echoes the requirements of the EIA regulations:

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

6.101 At the screening stage, the cumulative effects are considered for known projects where information is available in the public domain. The assessment has therefore considered existing projects in the area and all reasonably foreseeable projects, including those under construction, benefiting from planning permission or those which are the subject of a submitted planning application.

6.102 The area of search has focussed on major developments in excess of 50 dwellings, or those falling within the threshold of major development for other forms of development within reasonable proximity of the Site. In addition, we have focused on sites with an approved or pending planning application as those at an earlier stage in the planning process do not generally have sufficient information available to inform a meaningful assessment. Sites where planning permission has been refused, and where there is no right of appeal, by virtue of the passage of time, have also not been considered.

6.103 The search identified the following potentially cumulative development (Table 1), in accordance with the EIA Regulations.

**Table 1: Potential Cumulative Developments**

| Site address and application reference | Description of Development | Planning Status | Distance from the Site |
|---|---|---|---|
| Former Master Brewer Site Freezeland Way Hillingdon<br><br>4266/APP/2019/3088 | Full planning permission for the construction of a residential-led, mixed-use development comprising buildings of between 2 and 11 storeys containing 514 units (Use Class C3); flexible commercial units (Use Class | Approved (GLA approval)<br><br>30.03.21 | Within 1km as the crow flies |

| | | | |
|---|---|---|---|
| | B1/A1/A3/D1); associated car (164 spaces) and cycle parking spaces; refuse and bicycle stores; hard and soft landscaping including a new central space, greenspaces, new pedestrian links; biodiversity enhancement; associated highways infrastructure; plant; and other associated ancillary development. | | |

6.104 The potential cumulative development described above is subject to its own technical evidence base and mitigation measures which have been considered through the respective proposal. It is unlikely, given the magnitude and spatial extent of the site, in accumulation with the subject Site, that they would give rise to likely significant effects as part of their construction or operational phase.

## 7. Conclusion

7.1 The effects of the proposed development, and the cumulative effects with other developments, are not held to be significant in respect of the Site.

7.2 The following additional assessments and documents are to be submitted alongside the planning application which will commit to standard mitigation measures to minimise environmental effects:

- Air Quality Impact Assessment
- Tree Survey and Arboricultural Impact Assessment
- Arboricultural Method Statement
- Archaeological Desk-Based Assessment
- Built Heritage Statement
- Preliminary Ecological Survey
- Biodiversity Net Gain Assessment and Metric
- Flood Risk Assessment and Surface Water Drainage Strategy
- Energy and Sustainability Statement
- Noise Impact Assessment
- Transport Assessment
- Draft Travel Plan
- Landscape and Visual Impact Assessment
- Contaminated Land Survey
- Energy Strategy and Sustainability Statement

7.3 Further to this, we recommend that the Council acknowledges that the Site is just over the 5-hectare threshold and that in practice only around half of the Site is proposed to be developed, as development will be focused in the north field only. This area (to be developed) equates to less than 3 hectares, which is well below the threshold. In addition, the Site is located within the settlement, in an urban area and is surrounded by existing residential development which taken as a whole will reduce the impact of the scheme.

7.4 We trust that you have sufficient information to determine whether this is an EIA development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended). From these Regulations, we note that the local authority has three weeks (beginning from the date of receipt) to form a screening opinion and to provide the main reasons for this opinion having regard to the relevant criteria listed in Schedule 3.

7.5 It is our professional opinion that the proposal does not constitute EIA development. The scheme does not fall within Schedule 1 of the Regulations, and the project is not likely to result in significant effects on the environment by virtue of its nature, scale, or location.

7.6 Accordingly, we conclude that an Environmental Impact Assessment is not required, and we respectfully request that the local planning authority adopt a formal Screening Opinion to this effect.

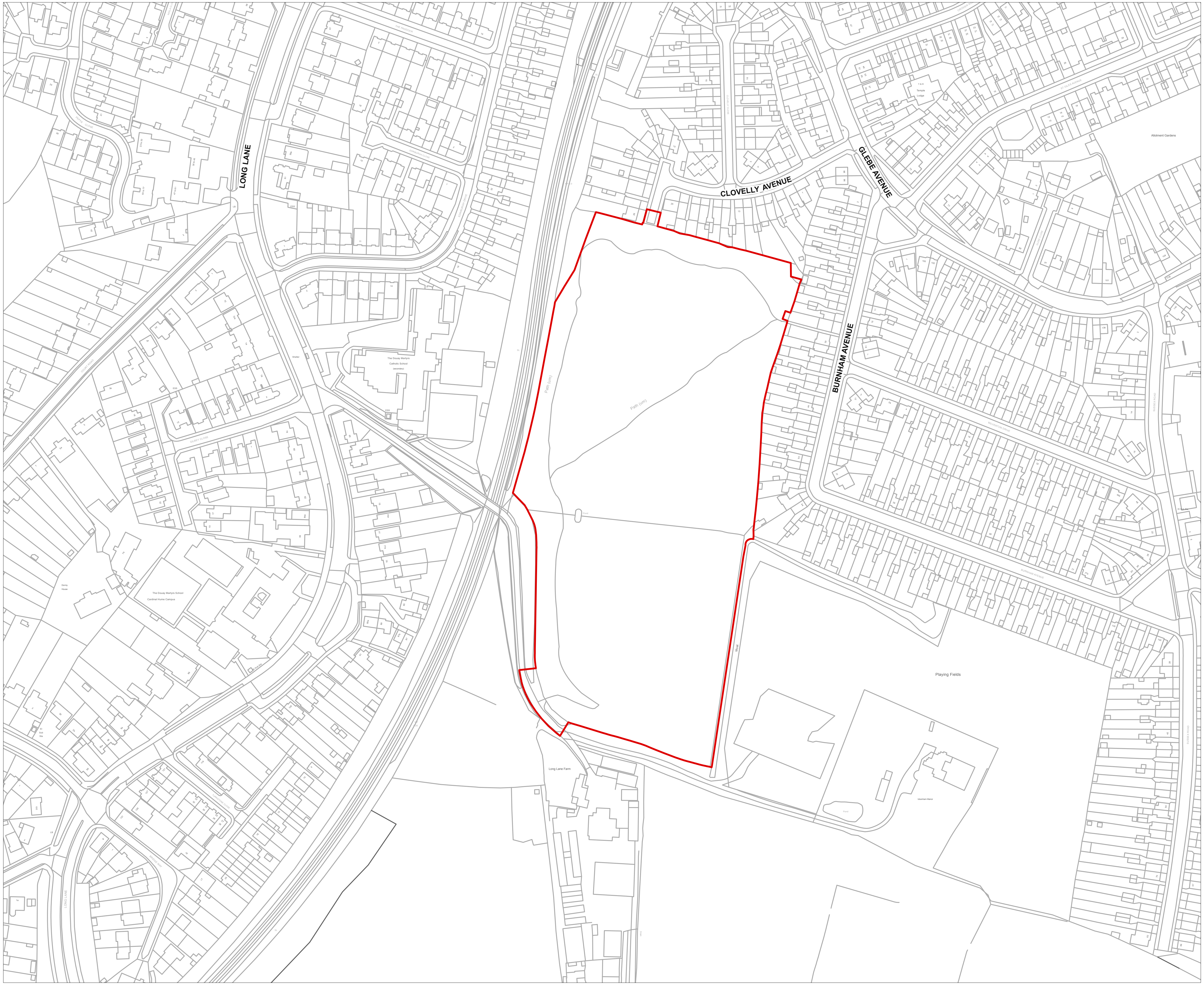
7.7 Please do not hesitate to contact me if you require any further information or have any queries.

Yours sincerely

RBrass

**Roland Brass**
Marrons, Director

Encl. Site Location Plan




Site boundary: 5.47 ha

Notes/Revisions

| | | | |
|---|---|---|---|
| A | 20/10/2025 | Northern and eastern boundary adjusted to property boundaries | JR |
| B | 23/10/2026 | Site boundary adjusted to include vis-splays. Scale amended. | JR |

0 50 75 100 m

# Land at Clovelly Avenue, Ickenham

Welbeck Land

N

## Site Location Plan

| Status: | Drawn by: | Checked by: |
|---|---|---|
| DRAFT | JA | JR |

| Project Number: | Scale @ A3: | Date: |
|---|---|---|
| 230218 | 1:2500 | 04/06/2026 |

| Drawing Number: | Revision: |
|---|---|
| TOR-PP01 | B |

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