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1. Introduction

1.1 Overview

1.1.1 This document is the Non-Technical Summary of the Environmental Statement (ES) that accompanies the outline planning application for the construction of a residential-led mixed use development known as the ‘Margarine Works’ (hereafter referred to as ‘the Proposed Development’). The site of the Proposed Development (hereafter referred to as ‘the Site’) is located within the administrative boundary of the London Borough of Ealing (LBE) in Southall, as shown on Figure 1-1.

1.1.2 Montreaux Developments Ltd (hereafter referred to as the ‘Applicant’) is seeking outline planning permission with all matters reserved except for access for the following development:

‘Outline Planning Application (with all matters reserved except access) for the demolition of existing buildings and structures; the retention, refurbishment and alteration of the Sunrise Radio Building and Maypole Margarine Factory façade; and the redevelopment of the site to include up to 2,083 residential units (use class C3), up to 7,199 sqm hotel floorspace (use class C1) (Gross Internal Area (GIA)), up to 2,688 sqm of flexible retail floorspace (use classes A1-A5) (GIA), and up to 10,076 sqm of flexible office and community floorspace (use classes B1, D1/D2) (GIA); any ancillary parking, amenity, plant, and services floorspace (including a new energy centre) and all other associated public, semi public and private realm, soft/hard landscaping, infrastructure and highway works, access and a new internal road network connecting with the existing road network.’

1.2 What is an Environmental Impact Assessment

1.2.1 An Environmental Impact Assessment (EIA) is a process to ensure that planning decisions are made, in this case by the LBE, with full knowledge of the likely significant environmental effects of a proposed development. The outcome of the EIA process is reported within the ES.

1.2.2 The objective of the EIA is to identify any likely significant effects which may arise from the Proposed Development and to identify measures to prevent, reduce or offset any adverse effects and to enhance any beneficial effects. During the EIA process for the Proposed Development, opportunities and management measures have been identified and incorporated within the development proposals to prevent or reduce any adverse effects and to enable for sustainable design and construction principles to be embedded within the Proposed Development.

1.2.3 The EIA informs the decision of whether to give consent for the Proposed Development to proceed and helps frame any planning conditions.

1.2.4 The ES comprises the following documents:

- **Non-Technical Summary (NTS)** – This document – which provides a summary of the Proposed Development and the findings of the ES in non-technical language;
- **Volume I: ES Main Document** – This presents the findings of the EIA and is divided into a number of background and technical chapters supported with figures and tabular information for clarity of reading;
- **Volume II: Heritage Townscape, and Visual Impact Assessment** – This document comprises a stand-alone Heritage, Townscape, and Visual Impact Assessment (HTVIA) accompanied by a set of views and images of the Proposed Development; and
- **Volume III: Technical Appendices** – Additional reports and survey data which provide further detail on the technical assessments undertaken and information used to inform Volume I.

1.2.5 This ES complies with the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the ‘EIA Regulations’) (Ref 1) and forms part of a suite of documents submitted as part of the planning application for the Proposed Development.
Figure 1-1: Site Location Plan
2. Planning Policy Context

2.1.1 The Site is located within the ‘East Southall’ character area of the Southall Opportunity Area Planning Framework (OAPF) (Ref 2) under the London Plan (Ref 3), and the ‘Southall East’ Development Site under the LBE Development Sites Development Plan Document (DPD) (Ref 4). The Southall OAPF sets out planning, regeneration and design guidance for maximising the regeneration potential of the existing under-utilised areas in Southall. In particular, the objective of the OAPF is to ‘deliver at least 6,000 new homes and 3,000 new jobs across 10 development sites in a 520ha opportunity area over 20 years’. The LBE Development Sites DPD implements the objectives of the Southall OAPF within local planning policy.

Figure 2-1: Southall OAPF Character Areas (adopted from the Southall OAPF, 2014)

2.1.2 Therefore, the principles for development proposals at the Site have been established within the London Plan and the local LBE planning policy. These principles form the basis of design for the Proposed Development. In addition to delivering on the London Plan and the LBE policy objectives for the Site, the Proposed Development will contribute significantly to the LBE housing target under the existing and Draft New London Plan (Ref 5).

3. Existing Site and Surroundings

3.1.1 The existing Site comprises the Middlesex Business Centre with purpose-built light industrial units, commercial premises and offices, which have never been fully occupied, as intended. The resultant areas of under-utilised space currently create a barrier between the Southall town centre and the areas to the east/ south-east allocated for regeneration. The Site also includes the locally listed Sunrise Radio Building and the Maypole Margarine Works factory façade, which is considered to be of local importance.

3.1.2 The Site is bordered by Network Rail lines to the north, with the closest stop being Southall Station. To the east is the Quayside Quarter (the former Honey Monster factory site), allocated in the Southall OAPF (Ref 2) for residential and commercial development, as well as a spur of the Grand Union Canal. Bridge Road runs in parallel to the southern
boundary of the Site, with commercial units and the Hortus Cemetery further beyond. Merrick Road borders the western boundary and separates the Site from a predominantly residential area.

3.1.3 An outline planning application for the redevelopment of the Site was submitted to the LBE in December 2014 on behalf of a previous applicant, hereafter referred to as the ‘Previous Planning Application’ (application ref. PP/2014/6440). The application remains undetermined, but was resolved to grant permission by LBE’s Planning Committee in February 2016. The description of development was as follows:

“Outline planning application seeking approval for access (all other matters reserved) for the redevelopment of the Middlesex Business Centre comprising the Demolition of all but the Sunrise Radio Building and adjacent Maypole Margarine Works façade to provide building with a maximum of 22 storeys in height (including basement and ground floor) to accommodate 835 residential units (Use class C3), 6750 sqm of student accommodation (Use Class Sui-Generis), 2475 sqm of retail (Use Class A1, A2, A3, A4 and A5), 6250 sqm of commercial floor space (Use Class B1) and a 5200 sqm Hotel (Use Class C1); together with associated car parking provision, accesses, footpaths, roads and landscaping areas.”

3.1.4 In line with the Southall OAPF, the surrounding area is under significant regeneration, with new development under construction at the Malgavita, Former Esso Garage and Greenview Court sites immediately to the west with further development planned at the Arches to the north-west and the Quayside Quarter immediately to the east. The major redevelopment schemes of Havelock Estate and Southall Waterside are located to the south-east and the north-west of the Site respectively.

4. Alternatives and Design Evolution

4.1.1 Alternatives analysis is a key part of the EIA process and serves to ensure that environmental considerations are built into the project design at the earliest possible stage. The alternatives to the Proposed Development which have been considered by the Applicant include:

- The ‘No Development’/‘Do Nothing’ Alternative;
- Alternative Sites; and
- Alternative Designs.

4.1.2 Both the ‘No Development’ option and the consideration of alternative sites were not considered viable, as these options would not comply with the vision set out within the local policy for the Site and the redevelopment objectives for Southall. As discussed above, the Site is allocated within the ‘East Southall’ character area of the Southall OAPF (Ref 2) and the ‘Southall East’ Development Site under the LBE Development Sites DPD (Ref 4) to provide a new residential led development, with a new local park and a green route through the Site.

4.1.3 It is considered that the Previous Planning Application missed opportunities for the delivery of housing and employment, but acts as a material consideration in relation to the acceptability of a comprehensive, mixed use redevelopment of the Site. Whilst the Previous Planning Application was resolved to grant full planning permission, it was not pursued further by the previous applicant. Since then, there has been significant change both in terms of emerging planning policy and development within the surrounding context of the Site. Therefore it is considered that pursuing the Previous Planning Application would miss opportunities in regards to the provision of housing and employment and hence, is no longer pursued by the current Applicant for the Site.

4.1.4 A number of alternative designs have been considered as part of the design evolution of the Proposed Development, as a result of the consultation process and the consideration of environmental constraints.

4.1.5 Throughout the design process, there has been frequent consultation with the LBE, Greater London Authority (GLA) and other statutory stakeholders. In addition, a comprehensive community engagement programme has been undertaken to inform the design process, as discussed in the Statement of Community Involvement submitted in support of the planning application for the Proposed Development.

4.1.6 The consultation process has resulted in amendments to the design of the Proposed Development and informed the planning application submission. Within this process, there were six main design iterations which followed on from the Previous Planning Application. These iterations represent how the Proposed Development has evolved through a process of analysis, design testing and consultation. The key principles which have informed the design include:
• Retention of existing heritage assets on-site, including the Sunrise Radio Building and the Maypole Margarine Works Factory façade;

• Sub-dividing the Site into a series of plots that together form a comprehensive development. The south is composed of lower scale buildings to respond to existing terraces within the surrounding area. Larger scale structures permeate the north, acting as a barrier to the railway whilst providing a focal point and marker buildings for pedestrian way finding;

• Integrating a new east to west link through the Site. This has been identified as the new primary east-west route and acts as a connection between Southall Station, Glade Lane Canalside Park and existing and emerging neighbourhoods;

• Establishing distinct character areas throughout the Site whilst responding to the existing context;

• Introducing new residential open spaces, protected amenity spaces, green piazzas, squares and pedestrianised streets, and a large public park at the heart of the Site; and

• Including active frontages with a mix of uses at ground level to animate public realm and line the series of public routes and open spaces.

4.1.7 There have been a number of environmental considerations and tests throughout the design evolution of the Proposed Development which have influenced the design, including (but not limited to):

• Air Quality – the location of the energy centre and its flues to the tallest building on Site to avoid potentially significant effects on residential properties at height;

• Acoustic Design – inclusion of minimum acoustic design standards within the Design Code of the Proposed Development to avoid noise effects on proposed residential uses from external (e.g. railway line) and internal (e.g. mechanical services and plant) noise sources.

• Aviation – due to the proximity to Heathrow Airport, airspace above the Site is subject to aerodrome safeguarding. As such, specific height limits apply at the Site, according to international standards and recommended practices. Consultation between the design team, Heathrow Airport and National Air Traffic Services (NATS) was undertaken, leading to an aviation safeguarding assessment of the Proposed Development being undertaken to support the planning application process.

• Climate Change – to minimise greenhouse gas (GHG) emissions from the Proposed Development and to promote climate change resilience, the Design Code of the Proposed Development includes design principles to reduce embodied carbon within materials, to reduce GHG emissions from energy use and to manage overheating and increased rainfall resulting from climate change;

• Daylight, Sunlight and Overshadowing – the impacts of potential daylight and sunlight to public amenity spaces were a key design consideration whilst the Proposed Development was undergoing the iterative design process. Early testing and recommendations included relocating Block C from the western boundary and increasing the distance between taller buildings (Blocks A and F) from the neighbouring Malgavita and Greenview Court schemes.

• Ecology – to compensate for the loss of habitat on Site, the Proposed Development includes biodiverse roofs and ecological features within design, such as bird nesting and bat roosting boxes, which will provide suitable habitat for terrestrial invertebrates, black redstarts and bats. The Landscape Strategy has been developed to improve habitat connectivity between the Site and the surrounding area and to provide a range of native species.

• Heritage, Townscape and Visual – the use of high quality design and materials will enhance the existing townscape and mitigate the effect of the taller buildings within the Proposed Development.

• Water – the Proposed Development incorporates Sustainable Urban Drainage Systems (SuDS) to improve water quality, reduce flood risk and provide amenity and biodiversity benefits. Surface water attenuation and treatment will be provided in the form of swales or attenuation tanks (depending on the development plot) and permeable paving. Rainwater harvesting will also be considered as part of detailed design, and a greater proportion of soft-landscaping and biodiverse roofs have been proposed to reduce urban runoff.

• Wind Microclimate - wind tunnel testing undertaken during the design evolution provided recommendations in relation to the landscape and architectural details of the Proposed Development.
5. **The Proposed Development**

5.1.1 As a result of the design evolution discussed above, the key components of the Proposed Development include:

- The retention of the locally listed Sunrise Radio Building and the Maypole Margarine Factory façade;
- 2,083 residential units;
- A new hotel (71,990sqm GIA);
- Flexible retail space at ground level (2,688sqm GIA);
- New office and community space (10,076 sqm GIA);
- 330 car parking spaces;
- Ancillary amenity, plant, utilities and services floorspace, including an energy centre;
- Public, semi-private and private realm; including a new public park (including 5,000sqm of playspace);
- A new internal road network, including the new primary east-west route which will connect Bridge Road and Merrick Road to allow for enhanced transport routes through the Site; and improved accessibility and transport links between Southall town centre and existing/emerging neighbourhoods to the east.

5.1.2 The design principles for the Proposed Development are set out within the Design Code, Landscape Strategy, Energy Strategy and Flood Risk Assessment and Drainage Strategy. Furthermore, it is proposed that a number of management plans are submitted with reserved matters applications to control the operation of the Proposed Development, including:

- Delivery and Servicing Plan;
- Travel Plan(s);
- Car Park Management Plan; and
- Operational Waste Management Strategy.

*Figure 5-1: Maximum Parameters Proposed Development Model*
6. **Demolition and Construction**

6.1.1 It is proposed that the demolition and construction works for the Proposed Development will be undertaken from 2019 to 2029 during an approximate 11 year period over seven phases, each phase taking two to three years to complete. An indicative construction phasing plan is provided in Figure 6-1, however it is noted that the phasing of the Proposed Development will be confirmed under a future reserved matters application.
Figure 6-1: Indicative Construction Phasing Plan
6.1.2 Each phase will comprise the following works:

- Demolition/ site Clearance;
- Piling and substructure construction;
- Superstructure construction;
- Envelope construction;
- Fit-out of buildings; and
- Public realm construction.

13.1.1 It is anticipated that the core working hours for both the demolition and construction phases will be as follows, with no works normally undertaken on Sundays or Bank Holidays:

- 08:00 – 18:00 weekdays; and
- 08:00 – 13:00 Saturday.

6.1.3 Further to this it is noted that there may be the requirement for some out of hours works (e.g. for piling works) that will require works outside of the core hours, subject to prior approval from the LBE.

6.1.4 Measures which will be implemented to minimise environmental effects during demolition and construction of the Proposed Development include:

- Implementation of a Construction Environmental Management Plan (CEMP) and adherence to the CEMP throughout demolition and construction. The CEMP will set out key environmental risks related to the demolition and construction works, measures to mitigate and manage these risks, construction environmental targets and a monitoring and inspection programme;
- Preparation and implementation of a Neighbour and Public Relations Strategy as part of the CEMP or separately to promote two-way communication between the future contractors of the Proposed Development and the neighbours of the Site;
- Registration with the Considerate Constructors’ Scheme;
- Preparation of a Construction Logistics Plan (CLP) to minimise adverse effects of construction traffic; and
- Preparation of a Construction Resource Management Plan/ Site Waste Management Plan or equivalent to minimise the generation of demolition and construction waste.

7. **EIA Methodology**

7.1.1 The environmental effects of the Proposed Development were assessed both during construction and once the Proposed Development is complete and occupied. The effects are described in terms of changes to the existing situation (the baseline). EIA assesses environmental effects on resources (such as archaeology) and receptors (such as human beings). The significance of the environmental effects were assessed by judging the sensitivity (that is, the importance) of a resource or receptor against the magnitude (that is, the scale or extent) of the predicted impact. The duration and geographic scale of the effects were also taken into account.

7.1.2 The assessment is based on the planning application documents, in particular the parameter plans and the Design Code.

7.1.3 The EIA has assumed certain aspects of the design, such as landscaping proposals and drainage design that will help to limit the extent of potential environmental effects. It also assumes mandatory application of a CEMP, which the Applicant will require contractors to prepare, based upon the measures set out in the ES, before they start any construction work.

7.1.4 Where significant effects are still likely to occur, additional measures are proposed to reduce effects where practicable. Any effects that remain, once these measures are taken into account, are reported as ‘residual effects’.
7.1.5 The content or ‘scope’ of the EIA was agreed through the production of an EIA Scoping Report. Following the provision of a ‘Scoping Opinion’ by the LBE, the following environmental topics were addressed in detail in the EIA:

- Air Quality;
- Archaeology;
- Climate Change;
- Daylight, Sunlight and Overshadowing;
- Ecology and Biodiversity;
- Ground Conditions and Contamination;
- Noise and Vibration;
- Socioeconomics and Health;
- Traffic and Transport;
- Wind Microclimate;

7.1.6 There were four topics scoped out of the EIA as it is considered that the effects to arise from the Proposed Development on these topics are not likely to be significant and as such do not require further assessment within the EIA. The topics scoped out include Major Accidents and Hazards, Waste and Resources, and Water Environment.

7.1.7 A development of this nature is certain to have some effects on the environment, both beneficial and adverse. What is important is that ‘significant’ adverse effects are identified and reduced through the design process, or through other mitigation measures. ‘Significant’ effects are considered to be those effects which represent key factors or material influences in the decision making process.

7.1.8 The beneficial effects are also reported in the ES to ensure the benefits arising from the Proposed Development are realised and the balance of issues is understood. The remainder of this Non-Technical Summary sets out the findings of the ES, on a topic by topic basis.

8. Findings of the Environmental Statement

8.1 Air Quality

8.1.1 Chapter 8: Air Quality of the ES presents the findings of an assessment of the likely significant effects of the Proposed Development on air quality at the Site and surrounding area.

8.1.2 The Proposed Development is located in the LBE Air Quality Management Area. Recent air quality monitoring data indicates that roadside concentrations of nitrogen dioxide (NO₂) in the area are close to or exceed the long-term air quality standard set for the protection of human health. At locations away from busy roads the concentrations are considerably lower.

Demolition and Construction Phase Effects

8.1.3 During the construction phase, the Proposed Development has the potential to generate dust nuisance beyond the Site boundary. However, through the implementation of a Dust Management Plan as part of the CEMP, the impacts will be effectively minimised and are unlikely to be significant.

Complete and Occupied Phase Effects

8.1.4 Emissions from operational traffic associated with the Proposed Development are not anticipated to significantly affect local air quality, as the Proposed Development is estimated to generate less traffic than the existing uses of the Site. However dispersion modelling of emissions from traffic on the local...
road network has been undertaken to ascertain the likely level of exposure of future occupants of the Proposed Development to elevated nitrogen dioxide and particulate concentrations. The assessment indicates that concentrations at the Proposed Development will be well within the relevant air quality standards.

8.1.5 Furthermore, dispersion modelling demonstrates that emissions from the energy centre incorporated within the Proposed Development will not result in a significant effect on local air quality.

8.1.6 The Proposed Development will also be Air Quality Neutral in line with the requirements of the London Plan with respect to building-related (energy centre) emissions.

8.2 **Archaeology**

8.2.1 *Chapter 9: Archaeology* of the ES presents the findings of an assessment of the likely significant effects of the Proposed Development on archaeological resource within the Site and surrounding area.

8.2.2 The archaeological baseline of the Site has been established on the basis of a historic environment desk-based assessment and a review of recent ground investigations within the Site, historic environment records and mapping. There are a number of known and potential assets within the Site associated with the post-medieval industrial use of the Site.

**Demolition and Construction Phase Effects**

8.2.3 A staged approach to archaeological mitigation is proposed which will focus on determining the survival and condition of any buried archaeology which may be present within the Site. With an archaeological mitigation programme established prior to the start of construction in consultation with the LBE, the effects of the Proposed Development on archaeology are not considered to be significant.

**Complete and Occupied Phase Effects**

8.2.4 Any potential effects on archaeology will take place during the demolition and construction phases of the Proposed Development. Therefore, there are no additional effects on archaeology once the Proposed Development is complete and occupied.

8.3 **Climate Change**

8.3.1 *Chapter 10: Climate Change* of the ES presents the findings of an assessment of the likely significant effects of the Proposed Development on climate (i.e. Green House Gas (GHG) emissions from the Proposed Development) and the future climate on the Proposed Development (i.e. the climate change resilience of the Proposed Development). In-combination climate change impacts (i.e. the effects of the Proposed Development with climate change) have been scoped out of the EIA, as these impacts have been assessed under other technical topics of the EIA or within other planning documents (such as the Flood Risk Assessment and Drainage Strategy).

**Demolition and Construction Phase Effects**

**GHG Emissions**

8.3.2 Total GHG emissions from the demolition of existing buildings on the Site and from construction of the Proposed Development are estimated to be 37,772 tonnes of carbon dioxide equivalents (tCO₂e). GHG emissions from the demolition and construction phase will be limited to 11 years when construction activities will be taking place. When this is annualised, total emissions equate to 3,434 tCO₂e per year.

8.3.3 It is noted that the majority of GHG emissions associated with the construction of the Proposed Development are linked to embodied carbon in materials, followed by worker transportation, and fuel and energy consumption during the demolition and construction activities.

8.3.4 While the Design Code for the Proposed Development sets out the underlying principles for minimising embodied carbon in materials, the material specifications will be confirmed at the detailed design
stage. Applicable measures for the reduction of energy and carbon emissions during the demolition and construction period will be included within the CEMP. The CLP will outline measures to encourage sustainable modes of travel to Site by the construction workers.

Climate Change Resilience

8.3.5 While the effects of climate change on the construction phase of the Proposed Development were considered, it is not anticipated that there will be any significant impacts to construction as a result.

Complete and Occupied Phase Effects

GHG Emissions

8.3.6 The total GHG emissions from the operational phase of the Proposed Development are estimated to be in the order of 4,523 tCO₂e per year. When considering emissions from the existing uses of the Site, the additional GHG emissions generated by the Proposed Development are estimated to be in the order of 4,125 tCO₂e per year.

8.3.7 Once the Proposed Development is complete and occupied, the majority of the GHG emissions will be associated with energy consumption. The design of the Proposed Development includes the provision of an energy centre for a low carbon energy source. Further energy efficiency measures and the provision of renewable energy (such as solar panels) are to be confirmed at the detailed design stage.

Climate Change Resilience

8.3.8 A number of design principles for climate change resilience have been incorporated within the Design Code, Drainage Strategy and Landscape Strategy for the Proposed Development, which are to be implemented during detailed design development. With these measures in place, the Proposed Development is considered to be of high resilience to climate change.

8.4 Daylight, Sunlight and Overshadowing

8.4.1 Chapter 9: Daylight, Sunlight and Overshadowing of the ES presents the findings of an assessment of the likely significant effects of the Proposed Development on the daylight and sunlight amenity of the area surrounding the Site.

8.4.2 The assessment has been undertaken in accordance with the British Research Establishment publication ‘Site Layout Planning for Daylight and Sunlight’ (BR209), the application of which is recommended by the GLA in the London Plan (2016) (Ref 3).

8.4.3 Within the baseline conditions, the daylight and sunlight levels achieved by the neighbouring residential properties and schemes are varied with some in excess of those typically found in urban areas whereas others experience limited daylight and sunlight conditions typical within an urban opportunity area, where tall buildings emerge alongside one another.

Demolition and Construction Phase Effects

8.4.4 Any affects due to construction will be temporary and fluctuating as each phase of the Proposed Development is implemented, and any impact due to equipment such as cranes would be short-term and changeable during construction working hours. Hoarding is likely to be erected around the Site for the duration of construction; however a typical hoarding of around 2.4 meters is unlikely to have an adverse effect on daylight and sunlight conditions due to the distance of the neighbouring sensitive receptors from the Site.

Complete and Occupied Phase Effects

8.4.5 The Proposed Development is likely to have a significant effect on the daylight and sunlight amenity of the emerging Malgavita, Former Esso Garage and Greenview Court schemes, which are currently under construction. Given that the existing Site comprises low-rise buildings, with the tallest structure on-site and in the surrounding area being the 5-storey Sunrise Radio Building, such impacts are not unexpected. However it is noted that any substantial new development proposed on the Site would
likely result in significant effects. It is considered that the levels of daylight and sunlight amenity retained by the neighbouring properties are comparable with those achieved and accepted elsewhere in the Southall Opportunity Area. It is therefore considered that on balance, local and regional policy is satisfied and no mitigation measures would be required.

8.5 Ecology and Biodiversity

8.5.1 Chapter 12: Ecology and Biodiversity of the ES presents the findings of an assessment of the likely significant effects of the Proposed Development on ecology and biodiversity of the Site and surrounding area. The assessment considers effects on designated sites, habitats and protected species.

8.5.2 The baseline assessment comprised a desk study and a set of ecological surveys, including bat and black redstart surveys. There are a number of ecological receptors surrounding the Site including the London Canals Site of Importance for Nature Conservation (SINC) 200m east of the Site, Southall Railsides SINC immediately north of the Site, Hortus Cemetery SINC immediately south of the Site, as well as a number of habitats, common bird assemblages and bats using the Site for foraging and commuting.

8.5.3 Based on a combination of survey data collected to date and a precautionary approach, an assessment of the importance of ecological receptors on Site has been made.

Demolition and Construction Phase Effects

8.5.4 No significant effects are expected to occur in relation to ecology during the construction phase for the Proposed Development.

8.5.5 Providing the CEMP is implemented during the works, potential effects of dust, noise and construction lighting on the adjacent SINCs and habitats within or adjacent to the Site would be mitigated by standard construction environmental management measures and therefore, are not considered to be significant.

8.5.6 The removal of habitats used by foraging and commuting bats and nesting and foraging birds will be compensated through the provision of replacement habitats within the Proposed Development, including biodiverse roofs, landscaping and ecological features within design, such as habitat boxes for bats and birds.

8.5.7 The invasive non-native species, Japanese knotweed and giant hogweed, currently present within the Site will be removed.

Complete and Occupied Phase Effects

8.5.8 No significant effects are expected to occur in relation to ecology following completion of the Proposed Development.

8.5.9 In line with the Design Code for the Proposed Development, the operational lighting design will minimise light pollution on sensitive ecological receptors. Therefore operational lighting within the Proposed Development will not have a significant effect on designated sites and bats.

8.5.10 Overall no likely significant effects related to ecology, including on designated sites, habitats and protected species, are expected to occur as a result of the Proposed Development, due to the provision of replacement of habitats and ecological features within the design of the Proposed Development.

8.6 Ground Conditions and Contamination

8.6.1 Chapter 13: Ground Conditions of the ES presents the findings of an assessment of the likely significant effects of the Proposed Development as a result of the existing ground conditions of the Site.
8.6.2 The assessment is based on a review of the Site's geological and hydrogeological baseline, previous ground investigations undertaken at the Site and a site reconnaissance survey. Previous ground investigations have demonstrated that various pollutants are present within the soils at the Site. Groundwater quality across the Site has been found to be commensurate with that of an area with an industrial urban legacy. Ground gas monitoring has detected elevated concentration of carbon dioxide on-site.

**Demolition and Construction Phase**

8.6.3 A number of environmental mitigation measures are expected to be employed as part of the CEMP to minimise impacts to both human health and controlled waters during the demolition and construction phase. Following the implementation of these mitigation measures, the remaining potential impacts include the risk of disturbance of contaminated ground and unexploded ordnance (UXO), such as bombs or explosives from World War II.

8.6.4 These risks can be mitigated through the implementation of a full remediation strategy, which would need to be approved by the LBE, and would be heavily influenced by the widespread asbestos and asbestos containing materials contamination at the Site. An appropriate remediation strategy will be agreed with the LBE following a Phase II Ground Investigation (including contamination testing of soils, groundwater and ground gas monitoring) and a quantitative assessment of the risk of contamination. Gas monitoring would provide information as to the necessity for any gas protection measures needed within the Proposed Development and a piling risk assessment will be undertaken to assess the risk of mobilising contamination through piling works. A UXO Desk Study will also be commissioned prior to the start of any intrusive works and the recommendations within this report will be taken into account.

**Complete and Occupied Phase Effects**

8.6.5 Upon completion and occupation of the Proposed Development, the Site will be covered by a combination of buildings, hardstanding, landscaped areas and gardens. The buildings and hardstanding will both form an effective barrier to any residual contamination at the Site, which will be minimal following the remediation of the Site. Therefore no significant effects as a result of ground contamination are considered likely.

**8.7 Noise and Vibration**

8.7.1 Chapter 12: Noise and Vibration of the ES presents the findings of an assessment of the likely significant effects of the Proposed Development on noise and vibration of the Site and surrounding area. A noise and vibration survey was undertaken at the Site in May 2018 which informed the baseline scenario for the noise and vibration assessment. The noise and vibration monitoring locations were selected to represent the noise levels on the northern, western and southern boundaries of the Site. These measurements also represent the baseline noise levels at the nearest existing residential properties.

**Demolition and Construction Phase Effects**

8.7.2 The construction noise and vibration effects are considered to be temporary and not significant with the implementation of appropriate construction environmental management measures set out within the CEMP. A detailed construction noise assessment including the specification of appropriate noise mitigation measures will form part of the CEMP for the Proposed Development. Contractors will also be required to ensure that works are carried out in accordance with Best Practice Measures (BPM) as stipulated in the Control of Pollution Act 1974.

8.7.3 Construction traffic is predicted to provide a small temporary change in noise level during daytime at the nearest noise sensitive properties, however this is not considered to be significant.

**Complete and Occupied Phase Effects**

8.7.4 The noise assessment for the residential blocks indicates that acoustic glazing with acoustically treated ventilation is required for habitable rooms to mitigate for any potential noise from the existing environment (e.g. existing traffic, aircraft and railway noise) and the new uses of the Proposed
Development, including from mechanical services plant and delivery and servicing. The design principles for acoustic design form part of the Design Code for the Proposed Development, and with these in place, the effects of noise on the future occupants of the Proposed Development are not considered to be significant. It is also noted that the northernmost blocks of the Proposed Development have been offset by 14m from the railway line to minimise noise from the railway on the new residential properties.

13.1.2 The proposed outdoor open spaces will be partially shielded from existing noise sources by the proposed buildings, however may experience moderate adverse noise levels during daytime which can be considered to be significant. In line with the British Standards (BS 8233), it is noted that a compromise between elevated noise levels and other factors, such as the convenience of living in these locations or making efficient use of land resources to ensure development needs can be met, might be warranted. In this situation, BS 8233 indicates that the development should be designed to achieve the lowest practicable levels in these external amenity spaces, but should not be prohibited.

8.7.5 It is noted that the Proposed Development is not expected to generate any more traffic than the existing uses at the Site due to the limited number of car parking spaces provided, and therefore is not expected to generate any additional noise due to traffic.

8.7.6 The vibration assessment concluded rail vibration will not be perceptible at any of the assessment locations.

8.8 Socio-economics and Health

8.8.1 Chapter 15: Socio-Economics and Health of the ES presents the findings of an assessment of the likely significant effects of the Proposed Development on socio-economics and human health at the Site and within the surrounding area.

8.8.2 The assessment considers the social impacts (housing provision, access to education, healthcare, playspace and open space) and economic impacts (employment and local spending) of the Proposed Development. The Proposed Development was assessed against the existing socio-economic baseline conditions at the Site and the surrounding area and, where relevant, within a Borough (LBE) and regional (Greater London) context. Baseline socio-economic conditions have been established by drawing on nationally recognised data and research including (but not limited to) Census 2011, Office for National Statistics employment data, and statistics released by the Department for Education and National Health Service.

Demolition and Construction Phase Effects

8.8.3 The demolition and construction phases of the Proposed Development are expected to generate construction employment, amounting to an average of approximately 341 gross direct employees on site per year. There will also be additional employment generated indirectly through the construction supply chain. The construction phase of the Proposed Development will therefore have an overall minor beneficial effect on the local economy as a result of construction employment.

Complete and Occupied Phase Effects

8.8.4 The Proposed Development is estimated to generate a total of 656 net jobs from the office, retail and other uses on-site and indirect and induced employment within the surrounding area. Furthermore, the Proposed Development will contribute to the target for new commercial areas set out within the Southall OAPF and benefit the Greater London economy through additional spending in the local area.

8.8.5 The Proposed Development will also contribute to meeting LBE's housing targets by adding 2,083 residential units to the existing housing stock which will result in a significant major beneficial effect on housing provision. In accordance with the London Plan, the Proposed Development will provide the maximum amount of affordable housing with regard to the overall scheme viability.

8.8.6 The Proposed Development will provide a financial contribution for primary school provision via Section 106 agreement to mitigate increased demand from the Proposed Development. There is sufficient capacity to accommodate the increased demand for secondary school education and for primary healthcare from the Proposed Development within the surrounding area.
The Proposed Development will provide new areas of public open space and play space, with areas on site suitable for children of all age groups, which is over and beyond the requirements for the Proposed Development alone. This is considered to have a significant moderate beneficial effect on the local area, which is currently characterized by lack of public open space and play space provision.

Therefore the Proposed Development is not considered to have a significant adverse effect on the existing social infrastructure and is considered to benefit the local area through public open space and play space provision.

The Proposed Development has also been designed to benefit the health and wellbeing of its future occupants, site users and the local community, through design features such as new public open and play space, landscaped streetscapes, promotion of social interaction and mixing, promotion of walking and cycling through the provision of new pedestrian routes and a cycleway and the design of safe and secure environments through the provision of Secured By Design measures, such as Closed Circuit Television (CCTV) coverage and the promotion of natural surveillance.

**Traffic and Transport**

Chapter 16: Traffic and Transport of the ES presents the findings of an assessment of the likely significant effects of the Proposed Development on the existing transport infrastructure and its users at the Site and within the surrounding area. A Transport Assessment and Framework Travel Plan have also been prepared for the outline planning application of the Proposed Development.

An assessment of the local pedestrian network indicates that a wide range of facilities and transport hubs are within walking distance of the Site. This includes the retail, food, leisure and community uses to be found on The Green and Southall High Street and Broadway. In addition, Southall Station is within a 5 minutes’ walk of the Site providing direct access to the Great Western Railway services. There are ten bus services which are available within easy walking distance of the Site.

The Site is surrounded by a network of existing and proposed dedicated cycle routes. In addition improvements to cycle and pedestrian routes in the local area are planned including a proposed Foot and Cycle Bridge which is to be constructed across the railway line that will replace the previous footbridge that was demolished in 2017.

**Demolition and Construction Phase Effects**

The Proposed Development will be supported by a Construction Logistics Plan (CLP) which will be a management document to guide and control vehicle movements and operations associated with the construction phase. The construction vehicle route management plan, included in the CLP, will ensure that HGVs only use roads wide enough and suitable for that class of vehicle, the result being no significant effect on fear and intimidation of vulnerable road users.

Traffic flows will generally take place out of peak hours when the local highway network has a greater operational capacity. If all phases of the Proposed Development were to be completed at the same time (i.e. the absolute worst-case for traffic generation from the Proposed Development), this would generate 24 HGV two way trips per day (based on estimated incoming and outgoing material quantities). This is less than the daily variation on any part of the local highway network and less than the existing HGV movements and would therefore have no effect on highway safety, severance or operational capacity.

**Complete and Occupied Phase Effects**

The Proposed Development will be supported by a Transport Implementation Strategy (TIS) comprising:

- Framework Travel Plan;
- Delivery and Servicing Plan; and
- Car Parking Management Plan.
8.9.7 In addition a financial contribution towards district level pedestrian and cycling infrastructure improvements will be made through the Section 106 agreement, as a means of mitigation.

8.9.8 During the peak periods the majority of trips from the Proposed Development will be made on foot and by rail, followed by bus. This increase in rail and bus patronage is not considered to have an effect on the capacity but would add revenue to the local services. There would be no significant effect on pedestrian and cycle infrastructure as a result of crowding.

8.9.9 The transport impact of the Proposed Development is derived by comparing the existing travel demand associated with the existing uses on the Site and the predicted trips from the Proposed Development. This assessment shows that when compared to the existing uses the Proposed Development would result in a small increase in peak hour traffic but a reduction in traffic across the day as a whole. Furthermore, the assessment has demonstrated that the Proposed Development would result in no more vehicular traffic than the Previous Planning Application and so the traffic effects are already taken into account in the LBE network transport model.

8.10 Wind Microclimate

8.10.1 Chapter 17: Wind Microclimate of the ES presents the findings of an assessment of the likely significant effects of the Proposed Development on wind microclimate of the Site and surrounding area. An assessment of the wind conditions as a result of the Proposed Development has been undertaken, and the results categorised according to their suitability in terms of pedestrian comfort and safety. The assessment has been informed by appropriate meteorological data and detailed wind tunnel testing.

8.10.2 The baseline wind conditions were generally found to be suitable for the intended pedestrian use, with the exception of two off-site locations which did not meet the criteria for pedestrian comfort and five locations on and off-site which currently exceed the safety criteria.

Demolition and Construction Phase Effects

8.10.3 Mitigation measures are not required for construction, as wind conditions are expected to be suitable for a construction Site which is not accessible to the general public.

8.10.4 Upon the completion of the first northern-most phases of the Proposed Development, windier conditions are expected initially, as these phases will be more exposed to prevailing winds. Therefore, temporary mitigation measures may be required, particularly for Blocks A and B of the Proposed Development. The requirement and development of mitigation measures will be determined at the detailed design stage of each phase through further wind assessments.

8.10.5 Therefore, no significant adverse effects on wind microclimate during the demolition and construction phase are considered likely.

Complete and Occupied Phase Effects

8.10.6 Wind mitigation measures to be incorporated within the final design of the Proposed Development are to be confirmed at the detailed design stage, when the intended uses of the Site are clarified and the associated wind conditions confirmed.

8.10.7 The majority of the Site is suitable for thoroughfare use, with the exception of one location at the north-west corner, which is likely to be mitigated with landscaping and/or purposely designed features at the corner of the building.

8.10.8 Most potential entrance locations have wind conditions suitable for the proposed use. If locations are to be located at the windier areas, measures in the form of recessing, screening or soft landscaping will mitigate these conditions.

8.10.9 Potential ground level and podium level amenity spaces are also generally suitable for the proposed use during the summer season, where localised shrubs or planters can be used to provide localised shelter to seating areas, if required in the windier areas.
8.10.10 Roof level areas are generally windier than required for amenity use during the summer season. However, it is expected that a developed landscaping scheme (consisting of soft and hard landscaping features), and architectural features will mitigate these winds.

8.10.11 Strong winds may occur at thirteen locations, where the mitigation measures suggested for the comfort conditions are also expected to benefit the strong winds.

8.10.12 With mitigation confirmed at the detailed design stage, no significant adverse effects on wind microclimate once the Proposed Development is complete and occupied are considered likely.

8.11 Heritage, Townscape and Visual Impact Assessment

8.11.1 The HTVIA included within ES Volume II considers the heritage, townscape and visual effects of the Proposed Development and follows established best practice guidance.

8.11.2 It is noted that the Site is not in a Conservation Area nor does it contain any statutory listed buildings. However, the existing Sunrise Radio building within the Site is a locally listed building and the former Maypole Margarine Works factory façade is considered to be of local importance. There are also a number of listed buildings and the Osterley Park Registered Park and Garden within the Zone of Theoretical Visibility of the Site.

Demolition and Construction Phase Effects

8.11.3 The Site would be enclosed by hoardings during construction, which will provide a visual buffer for the immediate environment. Over longer distances, tower cranes will be visible and may impact on views within the surrounding area. The visual impact of these works is, however, limited geographically, and is tempered by their temporary nature.

8.11.4 In summary, any visual effects during the demolition and construction phase would be temporary in nature and short to medium term in duration, diminishing further from the Site. These effects are the necessary first steps in the regeneration of the Site and will not exist upon completion. Overall, there are considered to be no significant effects arising from the construction phase of the Proposed Development on heritage, townscape or visual receptors.

Complete and Occupied Phase Effects

8.11.5 The transformational change envisaged for the centre of Southall and upon the Site itself within the Southall OAPF will inevitably bring about some significant effects as a result of the scale and nature of new development. The Design Code for the Proposed Development outlines principles for the development and use of high quality architectural design and materials. The proposed public realm and thoroughfares will enhance the connectivity of the Site and provide well planned useable public and private space. The detailed design of the Proposed Development will provide further opportunities to mitigate any adverse effects in line with these design principles.

8.11.6 Retention of the locally listed Sunrise Radio building and the historic frontage of the Maypole Margarine Works factory to Merrick Road will tie the Proposed Development into the former context of the Site and improve the appearance of these buildings whilst preserving their special interest. The Sunrise Radio building and the adjoining Maypole Margarine Works building will be refurbished and converted for use as office space as part of the Proposed Development. Hence the Proposed Development will provide a long-term use for these buildings which will ensure that they become an influential aspect of the character of the new Heritage Quarter.

8.11.7 There are no other direct impacts from the completed Proposed Development on designated heritage assets within the local area. All other effects comprise indirect effects on the settings of the assets, however there are no significant adverse effects. It is also noted that there will be no significant adverse effects on the cluster of highly graded listed buildings that form the core of the historic group in landscaped grounds to the south of the Registered Park and Garden (RPG) of Osterley Park, located c. 700m from the Site.

8.11.8 The overall effects of the Proposed Development once complete and occupied on townscape character areas and visual receptors are likely to be significant and will range from beneficial to
adverse. The adverse effects on visual receptors that have been identified arise through changes to views through and from the identified viewpoints, which capture the changes to views of the Site in its current form.

8.11.9 The overall heights of the Proposed Development would need to be considered within the context of other more recent developments of similar scale and emerging schemes within the surrounding area that are either under construction or have consent for redevelopment. The tall buildings within the Proposed Development will act as a townscape marker which will assist with wayfinding in the Southall OAPF. The architectural language used on the buildings will raise the quality of the architecture seen in the identified views overall, improving views of the Site where this is currently a detracting feature in the townscape.

8.12 **Cumulative Effects and Effect Interactions**

8.12.1 For the cumulative assessment, two types of effect have been considered:

- The effect interactions (referred as ‘Type 1’), being the combined effects of individual impacts of the Proposed Development, for example noise, airborne dust or traffic effects on a single receptor; and

- The combined effects of several development schemes (referred as ‘Type 2’) which may, on an individual basis not be significant but, cumulatively, have a significant effect.

8.12.2 These are further discussed in sections below.

**Effect Interactions (Type 1 Effects)**

8.12.3 A review of the residual effects presented in this ES has been undertaken in order to identify the potential for interactions and so, combined effects of individual impacts.

**Demolition and Construction Phase Effects**

8.12.4 During the demolition and construction phase of the Proposed Development, the early occupants of the Proposed Development and local residents within the vicinity of the Site may experience minor adverse effects due to noise from construction and reduced visual amenity. However, the demolition and construction phase will also offer employment opportunities to the residents.

8.12.5 Due to the temporary nature of the demolition and construction period and the construction environmental management measures set out within the CEMP, the combined effects on the early occupants and local residents are not considered to be significant.

**Complete and Occupied Phase Effects**

8.12.6 Once the Proposed Development is complete and occupied, there is potential for combined adverse and beneficial impacts to occur affecting:

- Future On-Site Users;
- Neighbouring Residential Properties;
- Neighbouring and Local Commercial Properties and Businesses; and
- Neighbouring/Local Amenity/Open Space.

8.12.7 These effect interactions are due to a combination of effects from socio-economic benefits delivered by the Proposed Development, reduction of daylight and sunlight amenity on the neighbouring Malgavita, Former Esso Garage and Greenview Court schemes, predicted noise environment once the Proposed Development is complete and occupied, reduction in vehicular traffic, changed visual amenity of the area and improved wind microclimate conditions.

8.12.8 The ability for adverse effects to interact is limited and can be controlled through environmental design and mitigation measures specified within this ES. The ability for beneficial effects to interact is more prevalent due to the provision of housing and affordable housing, provision of publically accessible open space, play space and visitor accommodation, as well as employment generation.
Cumulative Effects (Type 2 Effects)

8.12.9 Other known nearby developments that are of a sufficient scale to have the potential to combine their effects with the Proposed Development were identified through EIA Scoping in consultation with the LBE. Schemes considered within the cumulative effects assessment are shown in Figure 8-1 below.
Figure 8-1: Location of Schemes Considered in the Cumulative Effects Assessment
Demolition and Construction Phase Effects

8.12.10 Assuming the implementation of environmental design and management measures and mitigation (e.g. CEMP) at other development scheme locations, no significant cumulative effects are anticipated in relation to ground conditions, archaeology, noise and vibration and air quality.

8.12.11 It is unlikely that all of the cumulative schemes will have peak construction traffic demand at the same time, however if they were all constructed simultaneously the peak demand is not considered to have a significant effect on highway capacity, safety and severance but would have a significant effect on fear and intimidation, although this would be temporary in nature and managed through the implementation of CLPs.

8.12.12 No significant cumulative effects are anticipated in relation to daylight, sunlight and overshadowing, wind microclimate or on heritage, townscape and visual receptors.

8.12.13 With regard to socioeconomics the combined effects of the cumulative schemes are likely to have a significant beneficial effect on construction employment, due to the potential for the cumulative schemes to generate a large number of construction phase jobs (in addition to the Proposed Development).

Complete and Occupied Phase Effects

8.12.14 No significant cumulative effects are expected to occur in relation to ecology, wind microclimate, air quality, heritage, townscape and visual receptors as a result of the Proposed Development and cumulative schemes.

8.12.15 In regards to air quality, noise and traffic and transport, there will be no increase in traffic due to the Proposed Development and therefore there are no cumulative traffic effects.

8.12.16 In regards to socioeconomics and health the combination of the Proposed Development and cumulative schemes will result in significant beneficial effects in relation to employment, housing, and additional spending. The increase in residents may place additional demand on existing social infrastructure such as school provision and healthcare services although this is not considered to be significant.

8.12.17 A number of the cumulative developments will provide new private and public open or landscaped space as well as play space. Therefore, it is assessed that the cumulative developments will have a beneficial effect on open space and play space provision.

9. Conclusion

9.1.1 The Proposed Development will have an overriding beneficial effect and will regenerate and enhance the Site, contribute to the setting of the wider areas and secure the comprehensive redevelopment and ongoing management of both the Site and surrounding area.

9.1.2 Whilst it is acknowledged that some adverse effects may be experienced during the construction phase, these impacts will be temporary in nature and controlled by onsite construction environmental management measures in line with a CEMP. Once the Proposed Development is complete and occupied, the benefits of bringing the Proposed Development forward are considered to outweigh the identified adverse effects, which would be unavoidable in relation to daylight, sunlight, changed views of the Site and the noise environment at the outdoor amenity spaces within the Proposed Development.

9.1.3 Furthermore, it is considered that the Proposed Development will not result in any new or worse significant effects compared to the Previous Planning Application that received resolution to grant consent (ref: PP/2014/6440), with the exception of daylight, sunlight and overshadowing effects on the residential properties immediately adjacent to the Site (Malgavita, Former Esso Garage and Greenview Court). However, as noted above, the levels of daylight and sunlight amenity retained by...
the neighbouring properties are commensurate with those achieved and accepted elsewhere in the Southall Opportunity Area.

9.1.4 The design of the Proposed Development has evolved through continuous consultation with planning officers at the LBE and consultation with other key consultees including the GLA). Considerable care has been given to ensuring an appropriate design outcome through extensive EIA testing and consultation.

9.1.5 Overall, the Proposed Development accords with the objectives of planning policies at national, regional and local levels, in particular the Southall OAPF (Ref 2), and is considered to be in accordance with the Government’s objectives for sustainable development.

10. Environmental Statement Availability

10.1.1 This ES is available for viewing by the public via the LBE public access portal: https://pam.ealing.gov.uk/online-applications/.

10.1.2 Please contact LBE (by telephone 020 8825 6600 or by email MultimediaTeam@ealing.gov.uk) to make arrangements to view the ES in hard copy. The charges associated with requesting printed copies of documents are set out online at: https://www.ealing.gov.uk/downloads/download/3417/charges_for_copies_of_planning_documents.

10.1.3 Comments on the planning application should be made via the LBE public access portal (https://pam.ealing.gov.uk/online-applications/).
References


Ref 2. Greater London Authority (GLA), 2014; Southall Opportunity Area Planning Framework

Ref 3. GLA (2016); The London Plan Spatial Development Strategy for Greater London

Ref 4. LBE (2012); ‘Core Strategy Development Plan Document (DPD)’, Available at: https://www.ealing.gov.uk/info/201164/local_plans

Ref 5. GLA (2017); Draft The London Plan Spatial Development Strategy for Greater London
