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26<sup>th</sup> June 2026

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Dear Sir/ Madam,

**Environmental Impact Assessment Screening Opinion Town and Country Planning  
(Environmental Impact Assessment) Regulations 2017**

**Proposal:** Request for Screening Opinion as to whether an Environmental Impact Assessment is required for the proposed outline application (with all matters reserved except access and scale) of a part 8, part 28 storey building comprising flexible student or co-living accommodation (~500 student or ~480 co-living bedspaces), with access from Coles Green Road (including a pocket park) and an industrial building fronting Waterloo Road.

**Site:** 150 Coles Green Road, and Land Next to 51 Waterloo Road, Staples Corner, NW2 7JL

I write in connection to your screening request submitted on 7<sup>th</sup> June 2026 by ROK Planning on behalf of Buglar Homes Ltd. Reference has been made to Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations') "Requests for screening opinions of the relevant planning authority".

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

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

If you require any further assistance, please do not hesitate to contact Paul Lewin, on telephone 020 8937 6710 or email [planningstrategy@brent.gov.uk](mailto:planningstrategy@brent.gov.uk).

Yours sincerely,

**Paul Lewin**  
Team Leader Planning Policy

**EIA SCREENING OPINION STATEMENT OF REASONS**  
**The Town and Country Planning (Environmental Impact Assessment) Regulations**  
**2017**

**Description of Proposed Development:** Request for Screening Opinion as to whether an Environmental Impact Assessment is required for the proposed outline application (with all matters reserved except access and scale) of a part 8, part 28 storey building comprising flexible student or co-living accommodation (~500 student or ~480 co-living bedspaces), with access from Coles Green Road (including a pocket park) and an industrial building fronting Waterloo Road.

**Site:** 150 Coles Green Road, and Land Next to 51 Waterloo Road, Staples Corner, NW2 7JL

*Notes - The assessment of the proposed development's likely significant effects is in relation to the EIA Regulations only. The assessment does not imply any consideration of the planning merits of the proposals or indicate the likely success or otherwise of an application for planning permission.*

### **Introduction**

ROK Planning requested a screening opinion on behalf of Buglar Homes Ltd. from the London Borough of Brent (the Council) on 7<sup>th</sup> June 2026. Associated with this request, details of the site boundary, proposed development and an initial assessment of the potential impacts of the proposed development were submitted.

### **The Existing Site and Surrounding Area**

The ~0.4ha site currently predominantly comprises hardstanding used for the storage of vehicles for sale, and some small temporary structures. There is also a small mixed-use building, comprising an Italian restaurant at basement and ground floor, and residential above sited along Coles Green Road, within the site. The site is located within the Staples Corner Strategic Industrial Land (SIL) where industrial and commercial uses predominate, although to the south and west there is low rise housing development, as well as some more recently developed multi-storey flatted development. The site effectively comprises two adjoining rectangles along a diagonal, with large format warehouse buildings occupying the remainder of the site. Immediately to the east there is terraced residential buildings along Coles Green Road; to the south is the 6 storey flatted block Dean Court and the large format Attic self-storage building; to the west is older industrial stock along Waterloo Road; and to the north is Streakes Field Road and the large format industrial building occupied by DX Depot.

As well as being SIL, staples corner is also a Growth Area (BEGA2) and a Tall Building Zone. This includes all of the adjacent and contiguous industrial land to the North Circular and the Edgware Road. The Councils vision for the area has been formally set out within the Staples Corner Growth Area (SCGA) Masterplan which was adopted in 2024.

The site achieves a Public Transport Accessibility Level (PTAL) of 3 (moderate), and is ~150m from the neighbourhood parade located at the junction of Coles Green Road and Oxgate Lane.

The site is not located within a conservation area and there are no listed buildings within the site's curtilage. The closest listed buildings to the site are the Old Oxgate Farm Grade II\*

listed buildings ~110m to the south (Grade II\*). These are the oldest buildings in the borough. The site does not include significant green infrastructure, and does not include any associated designations. Nor is the site within close proximity to any nature conservation assets, with the closest asset being the Welsh Harp Site of Special Scientific Interest (SSSI), Site of Importance for Nature Conservation (SINC) and Local Nature Reserve and the associated River Brent, which is ~330m to the north.

The site falls within Flood Zone 1 (fluvial), with a small element within Flood Zone 3a adjacent to Magic House to the north. The site is also located within an Air Quality Management Area and Focus Area.

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

The proposal is for the demolition of all existing buildings and structures on site, and redevelopment to provide a mixed use development comprising a flexible Purpose Built Student Accommodation (PBSA) (~500 bedrooms) or Large-Scale Purpose-Built Shared-Living (LSPBSL) (~480 bedrooms) element of 8-28 storeys fronting Coles Green Road, and an industrial building fronting Waterloo Road. A pocket park will be sited along Coles Green Road allowing the larger elements to be set back from the more sensitive adjacent residential uses.

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

The request for screening opinion has been submitted with a supporting statement and Location plan setting out an analysis of the likely environmental effects of the proposal.

### **Previous History**

There is no relevant planning history at this site.

### **Large Scale Development within the Vicinity**

Within the vicinity there are currently the following applications for significant developments which have not yet commenced/ been completed to take account of when assessing the impact of the cumulative impact of the proposed development subject of this screening opinion in association with other developments:

Granted:

- 381A-D INC, 381-397 INC and 13-20 Park Parade Mansion, Edgware Road, Kingsbury, London, NW9 Variation of conditions 2 (Planning Drawings & Supporting Statement), 3 (South-East Facing Windows), 6 (Drainage Strategy), 11 (Ecology), 13 (Air Quality Assessment), 14 (Unit Mix), 15 (Commercial Floorspace), 16 (Construction Method Statement), 17 (Construction Logistics Plan), 18 (Fire strategy), 19 (Historical Recording), 20 (Piling Method Statement), 21 (District Heating Network), 22 (Site Investigation), 28 (Management Plan), 29 (Cycle Parking), 31 (Delivery & Servicing Management Plan) and 33 (Commencement of Class A3 Use) Full Planning Permission reference 17/2284 dated 02/07/2021 for Demolition of existing buildings and erection of a new mixed use building comprising commercial uses and residential units, with associated car parking, cycle storage, plant and shared external amenity space at first and fifth floor level with other ancillary works. Subject to a legal agreement dated the 2nd of July 2021. [ref. 24/3180, granted April 2025] No start on site.

- 1-8 Capitol Way - Demolition of the existing buildings and construction of a 2-storey building of flexible industrial floorspace (Use Class B2 & B8), ancillary commercial and cafe floorspace (Class E(g)(i) and Class E(b)), with ancillary yard area, service ramp, car and cycle parking, plant, associated public and private realm improvements, landscaping, pedestrian and vehicular access and associated highways works, subject to Deed of Agreement dated 16th May 2025 under Section 106 of Town and Country Planning Act 1990, as amended. [Ref. 24/2223, granted May 2025]. No start on site.
- 363 Edgware Road – Demolition of showroom and multi-storey carpark building and erection of a building to provide residential units (Use Class C3) with commercial use (Use Class E) at ground floors, together with associated parking and landscaping subject to a Deed of Agreement under Section 106 of the Town and Country Planning Act 1990 (as amended) dated the 15th September 2025. [Ref. 21/1124, Granted September 2025]. No start on site.
- 403-405 Edgware Road - Demolition of existing building and basements and replacement with mixed-use development incorporating 22 storey building and 3 basements, comprising: flexible light industrial (Use Class E(g)(iii))/B8 employment space (in accordance with Part 3 of Schedule 2 (Class V) of The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)); Use Class C1 Hotel (including ancillary gym, spa and swimming pool); Use Class F.1 Conference Centre; Use Class F.2 community hall; basement car parking accessed from Oxgate Lane; cycle parking; internal service yard; coach drop-off lay-by; management and back of house areas; plant; roof garden and outdoor terraces; public realm improvements and associated works, subject to Deed of Agreement dated 27 April 2026 under Section 106 of Town and Country Planning Act, 1990 as amended. [Ref 20/4143 Granted May 2026] No start on site.

The site is located approximately 400m from LB Brent's boundary with LB Barnet. As such, planning applications granted within the LB Barnet have the potential to incur cumulative impacts. The below are therefore included within this assessment.

- Unit 7 Staples Corner Retail Park - Demolition of existing building and structures and redevelopment of existing site to provide a building with a height of up to 26 storeys plus ground and mezzanine level, reducing to up to part 10 and part 11 storeys plus ground and mezzanine level, to provide a purpose built student accommodation (PBSA) scheme (Use Class Sui Generis) of up to 844 PBSA rooms, arranged as a mix of cluster flats and studios together with ancillary communal facilities, and ground floor commercial units (Use Class E), with associated cycle parking, mechanical plant, hard and soft landscaping, public realm and other associated works (The application is accompanied by an Environmental Statement) [Ref. 24/2584/FUL, Granted April 2024].
- Brent Cross Cricklewood Regeneration Area - Comprehensive mixed use redevelopment of the Brent Cross Cricklewood Regeneration Area comprising residential uses (Use Class C2, C3 and student/special needs/sheltered housing), a full range of town centre uses including Use Classes A1 - A5, offices, industrial and other business uses within Use Classes B1 - B8, leisure uses, rail based freight facilities, waste handling facility and treatment technology, petrol filling station, hotel and conference facilities, community, health and education facilities, private hospital, open space and public realm, landscaping and recreation facilities, new rail and bus stations, vehicular and pedestrian bridges, underground and multi-storey parking, works to the River Brent and Clitterhouse Stream and associated infrastructure,

demolition and alterations of existing building structures, CHP/CCHP, relocated electricity substation, free standing or building mounted wind turbines, alterations to existing railway including Cricklewood railway track and station and Brent Cross London Underground station, creation of new strategic accesses and internal road layout, at grade or underground conveyor from waste handling facility to CHP/CCHP, infrastructure and associated facilities together with any required temporary works or structures and associated utilities/services required by the Development (Outline Application). [Ref. F/04687/13, granted July 2014]. Started on site.

- Brent Cottage - Redevelopment of the site comprising of a part 1, part 8 and part 9 storey building (plus a basement level) to provide 63 self-contained residential units and associated car parking; secure cycle parking; refuse and delivery bay; refuse storage; plant; landscaping and amenity space. [Ref. 21/2485/FUL, Granted March 2022].
- 60 West Hendon Broadway - Demolition of an existing two-storey retail building and erection of an eight storey residential led mixed use building with 2no live/ work units at ground floor and 63no residential units on first and floors above. Associated external parking and associated landscaping. [Ref. 21/1522/FUL, Granted March 2024].

## **Other Environmental Assessments**

Regulation 5(5) (b) of the EIA Regulations requires the relevant planning authority to take into account the results of any relevant EU environmental assessments.

### Development Plan

The Brent Local Plan (2019 – 2041) was adopted at Full Council on the 24<sup>th</sup> February 2022 and is the key strategic document to guide and manage development in the borough. The development plan also comprises the West London Waste Plan (2015) and the London Plan (2021). Together these documents provide spatial policies, development management policies and site allocations to guide and manage development in the borough.

An Integrated Impact Assessment (IIA) accompanies the Local Plan, which incorporates the SA and SEA – that consider the potential for significant economic, social and environmental effects. This document has been considered when generating the EIA Screening Opinion. The SAs satisfied the requirements of the EC Directive 2001/42/EC and Strategic Environmental Assessment (SEA) Regulations on the assessment of the effects of certain plans and programmes on the environment.

These documents have been referred to when generating the EIA Screening Opinion.

### Legislation

The proposed development does not fall within any of the descriptions of development listed in Schedule 1 of the EIA Regulations, and is therefore not a 'Schedule 1 development'. The development does, however, fall within the description of a Schedule 2 development, classified under item 10 (b) as 'urban development projects'.

'Schedule 2 development' means development (other than exempt development – which this is not) of a description mentioned in Column 1 of the table in Schedule 2 where:

- a) any part of that development is to be carried out in a sensitive area; or

b) any applicable threshold or criterion in the corresponding part of Column 2 of that table is respectively exceeded or met in relation to that development.

No part of the proposed development is to be carried out in a 'sensitive area' as defined by the EIA Regulations.

The threshold for item 10(b) is as follows:

- (i) The development includes more than 1 hectare of urban development which is not dwelling house development; or
- (ii) the development includes more than 150 dwellings; or
- (iii) the overall area of the development exceeds 5 hectares.

The proposed development is for 500 PBSA or 480 LSPBSL bedspaces. Adjusted to be comparable to conventional housing development, for LSPBSL this is the equivalent to ~267 dwellings at a ratio of 1.8 for the co-living bedspaces. The proposed development therefore constitutes 'Schedule 2 development'.

Consideration must therefore be given to whether the proposed development may give rise to significant environmental effects, such that an EIA may be required.

#### Likely Significant Effects

The ultimate stage in the screening process is to consider whether it is '*likely to have significant effects on the environment by virtue of factors such as nature, size or location*'. As required by regulation 5(4)(c), where a relevant planning authority has to decide whether Schedule 2 development is EIA development, they must take into account the selection criteria set out in Schedule 3 as are relevant to the development.

The Council has taken into account the selection criteria set out in Schedule 3, where relevant to the proposed development. This includes the characteristics of the development, the environmental sensitivity of geographical areas likely to be affected, and the likely significant effects in relation to these criteria, with regard to the factors specified in regulation 4(2) and taking into account the types and characteristics of the potential impact listed in paragraph 3.

In addition, as required by regulation 5(5)(a), where the relevant planning authority adopts an EIA Screening Opinion they must state the main reasons for their conclusion with reference to the relevant criteria listed in Schedule 3. Within this Statement of Reasons, the Council has stated the main reasons for their conclusion, referencing the relevant criteria listed in Schedule 3 as appropriate.

The Council has concluded that the proposed development does not require an EIA to be undertaken to accompany a planning application for the proposed development, as the proposed development is not likely to generate significant environmental effects – Appendix A (below) sets out the reasoning for this decision.

## Appendix A – Consideration of Likely Significant Effects

### Air Quality

The site is located within the Brent Air Quality Management Area (AQMA). The majority of Brent has been designated as an AQMA, and therefore even small increases in emissions can lead to adverse effects. The AQMA has been declared for exceedance of the annual mean national objective for nitrogen dioxide (NO<sub>2</sub>) and the 24 hour mean national objective for particulate matter (PM<sub>10</sub>). It is also located within the Staples Corner Air Quality Focus Area (AQFA). These are parts of the borough where air quality is poor and human exposure is high, and therefore the impact of interventions can be significant.

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

Documentation Accompanying the Planning Application: *Supporting information states that a standalone Air Quality Assessment, and Air Quality Positive Statement, will be provided with the application.*

### Construction

Machinery used during construction can generate new sources of emissions, as well as traffic movements to/from the site and the works themselves. When assessing the effect of dust emissions generated during construction works, receptors are defined as the nearest potentially sensitive receptor to the boundary of the site in each direction. These receptors have the potential to experience effects of greater magnitude due to emissions of particulate matter generated by the works, when compared with more distant receptors.

The receptors in close proximity to the site, combined with the new emissions, means that there is the potential for adverse effects as a result of the construction of the proposed development.

Whilst there is the potential for adverse effects, with the implementation of standard best practice measures, it is not anticipated that the effects would be significant. Taking account of these practices the effect of dust soiling and PM<sub>10</sub> is likely to be reduced to negligible with the implementation of appropriate mitigation measures. These may include: No idling vehicles; Erect solid screens or barriers around dusty activities or the Site's boundary; Loads entering and exiting the Site are covered; Where practicable use mains or battery powered generators over fuel burning; Other dust suppression measures e.g. damping down with water; and all constructions vehicles and equipment to comply with relevant EU stage ratings. These standard mitigation measures can be implemented through a construction environmental management plan (CEMP), which can be secured through a standard planning condition.

As such, whilst there is the potential for adverse effects as a result of the proposed construction, with the implementation of standard mitigation measures, it is not anticipated that the effects would be significant and impacts are considered to be temporary.

### Operation

In terms of traffic generation, the residential element will be car free, meaning there will be limited trips generated. The proposed industrial element will have operational car parking, but this will be similar to existing and surrounding businesses. The industrial element alone is not of a scale which warrants EIA.

In terms of heating and hot water, the proposed development is likely to include the use of heat pumps which are low emission in order to satisfy the requirements for air quality positive. The proposal is therefore considered unlikely to result in significant environmental effects as regards air quality and therefore is not considered to represent EIA development.

### Mitigation

As the proposal is within a Growth Area and AQFA, emerging policy requires the development to be air quality positive.

During the construction phase a CEMP should be implemented which implements suitable measures to reduce the impact of dust and emissions. This can be secured via planning conditions.

The developer should consider the potential impact of air quality and dust on occupational exposure standards (to minimise worker exposure) and breaches of air quality objectives that may occur outside the site boundary. Continuous visual assessment of the site should be undertaken and a complaints log maintained in order determine the origin of a particular dust nuisance.

For the operational phase, suitable mitigation to be secured through a planning condition to ensure that new internal receptors are adequately protected.

Suitable conditions associated with the Transport Statement and Travel Plan and measures to reduce reliance on the private car, for example through provision of sufficient cycle parking will ensure reductions in impact through vehicle movements.

### Local Heritage

Documentation Accompanying the Planning Application: *A Heritage Assessment, as well as a Townscape and Visual Impact Assessment, will be provided as part of the full application.*

The site is not adjacent to any heritage assets, and is not within a Conservation Area. The nearest heritage asset is the Old Oxgate farm grade II\* listed buildings ~110m to the south. These are the oldest buildings in the borough. These buildings were on the heritage at risk register, and have since secured associated enabling development to allow for their restoration. This includes the delivery of a 4 storey block of flats to their rear within close proximity to the assets. There are also several 5-6 storey blocks of flats in between the proposed development site and these listed buildings. Therefore whilst the proposed 28 storey block has the potential to impact the wider setting of the nearby heritage asset, given the existing urban context, it is not considered likely that impacts will be significant so as to warrant an EIA.

The Council considers that given the scale of the development and the urban nature of its location the proposed development would not lead to significant adverse environmental effects on heritage assets, as such an EIA is not required in respect of heritage and cultural impacts. It is important to note that whilst the effects are not considered to be significant in relation to the EIA Regulations, this does not preclude the Council from taking into account the adverse effects (and their acceptability) when determining the planning application.

### Mitigation

During construction, ensure the erection and maintenance of hoarding.

### Climatic Factors

Documentation Accompanying the Planning Application: *The screening request has not been accompanied with any specific reports in relation to climatic factors, though supporting information states that there will be no risk of accidents caused by climate change and that the location is not susceptible to adverse climatic conditions. An Energy Statement and Sustainability Statement should be submitted as part of the planning application process.*

#### Construction

Emissions from construction traffic and plant can contribute towards the region's greenhouse gas emissions. The materials used also include a large quantity of embodied carbon. Due to the size of the proposed development the emissions are not considered to be substantial, and therefore no significant effects are anticipated. It is advised that sustainable methods of working should be implemented to reduce any emissions, and should be implemented as part of the CEMP. This should include achievement of net zero carbon in accordance with policy SI2 of the London Plan.

#### Operation

The Energy and Sustainability Statement(s) submitted as part of a planning application will need to demonstrate how the proposed development meets existing building regulations and planning policy standards. This should be through actual reductions in carbon emissions, combined with financial contributions where necessary. The provision of the above mentioned achievement of net zero carbon development in accordance with London Plan policy will go some way in achieving these outcomes. The effects of which are beneficial, but are not considered to be significant.

#### Mitigation

A CEMP should be secured that includes measures to reduce emissions e.g. management of plant to prevent plant running when not in use.

The s106 will need to be worded to ensure that any required carbon reduction off-set payments are secured.

Taking account of the above the Council does not consider that the environmental impacts related to climate change are significant enough to warrant EIA.

#### **Contaminated Land**

Documentation Accompanying the Planning Application: *A Preliminary Land Contamination Risk Assessment should be submitted as part of the planning application process. This should assess the potential effects of the proposed development and if necessary the need for further ground investigations to support a remediation strategy report with mitigation measures to deal with any residual effects.*

The site has predominantly been used for the storage of vehicles. However, as the site is located within a historically industrial area, there is the potential for sources of contamination related to its and the surrounding land uses. To ascertain the likely level of contamination, a Preliminary Land Contamination Risk Assessment would be required to be submitted with a planning application.

#### Construction

During construction there is considered to be a low likelihood of fuel leakages / spills from construction vehicles. A CEMP would be implemented to manage potential effects. In addition there is the risk of exposure to contaminated materials and opening up pathways to underlying substrata. Standard mitigation measures will be required during the construction of the proposed development, to ensure that the works are undertaken in an appropriate manner. These should be secured through conditions in agreement with the Council's Contaminated Land Officer. With the implementation of these mitigation measures, no significant effects are considered likely.

#### Operation

With the implementation of any required impact avoidance measures as part of the construction phase, no significant effects are anticipated at operation.

#### Mitigation

Standard construction mitigation measures should be secured through the CEMP and through conditions in agreement with the Council's Contaminated Land Officer.

Taking into account the above the contamination issues are not so significant as to warrant and EIA.

### **Daylight, Sunlight and Overshadowing**

Documentation Accompanying the Planning Application: *A Daylight and Sunlight Assessment will be required. The proposal has been informed by daylight, sunlight, and overshadowing analysis.*

The residential properties to the east along Coles Green Road are the most sensitive receptors.

#### Construction

During construction, there may be a change in the provision of daylight/sunlight due to the construction equipment (i.e. cranes) and the erection of the new buildings. The construction equipment will be temporary and short-term, and therefore not considered to be significant.

The erection of the new buildings will generate some adverse effects as it is built out. The construction effects will however be no greater than the completed, operational development, which are not considered to be significant.

#### Operation

The site is currently predominately level parking, with some temporary structures. The proposed development will result in a building of 8 and 28 storeys. Proposed impacts will therefore be much greater than existing.

The building proposed might have the potential to affect sunlight to sensitive neighbouring uses at certain times of the year due to its proximity to sensitive receptors. The most sensitive receptors are the residential properties immediately east along Coles Green Road. However, given the proposed development will be set back behind a pocket park, these will be 50m distant from the proposed development, which will significantly mitigate potential impacts. The buildings to the north and west are in industrial use, while those to the south will not be impacted. Given this and the site's urban location and duration of impact, the effects are not considered to be significant to warrant EIA.

## Mitigation

No discipline specific mitigation has been relied upon for the EIA Screening Opinion.

Taking account of the above it is considered that the environmental impacts in relation to daylight, sunlight and overshadowing would not be so significant to warrant EIA.

## **Biodiversity (including flora and fauna)**

Documentation Accompanying the Planning Application: *No discipline specific reporting has been relied upon as part of the screening report.*

The site includes limited green infrastructure, limited to a small amount of incidental planting along its border with Magic House. The remainder of the site comprises hardstanding with a few small temporary structures. The site is not within close proximity to any green infrastructure assets, including statutorily designated, nor locally designated. The closest statutorily designated asset is the Brent Reservoir SSSI and Local Nature Reserve (LNR). Last assessed on 20<sup>th</sup> March 2019, Brent Reservoir was identified as being in favourable condition, having a good breeding bird assemblage on the open water and fen habitats across the site. Brent Reservoir is also a SINC.

## Construction

A range of standard mitigation measures may be required to reduce potential adverse impacts on biodiversity, such as timing of demolition/ construction activities, relocation of bats and controls on lighting.

## Operation

Given the existing limited green infrastructure, the proposal has the potential to introduce more biodiversity at this site through more sympathetic landscaping. A Biodiversity Net Gain of at least 10% will also be required, which is beneficial, but not significant in this instance. Given the lack of biodiversity on site, potential for loss is also limited. The proposal could incorporate measures which would improve biodiversity, including factors outside the consideration of BNG, including swift bricks, bat and bird boxes, although given the dense nature of the development proposed, these are unlikely to be significant.

## Mitigation

Suitable conditions should be in place to ensure potential adverse impacts on any existing protected species are minimised prior to and during works on site, as well as incorporation of suitable features to encourage biodiversity resources as part of the development. The potential for contamination risk should be dealt with through the implementation of appropriate mitigation in the demolition and construction phase (to be secured by standard planning condition). Mitigation measures and compliance with regulatory waste disposal controls and hazardous material management would be set out.

Taking account of the above no significant environmental effects should arise which would require the need for an EIA.

## **Flood Risk**

Documentation Accompanying the Planning Application: *A Flood Risk Assessment and Drainage Strategy will be provided as part of a full application.*

The site is located within Fluvial Flood Zone 1. A small element of the site adjacent to Magic House is located with Flood Zone 3a for surface water flooding.

#### Construction

Given the scale of the development and the site's location within Fluvial Flood Zone 1 and a small element in Flood Zone 3a (surface water), the construction of the proposed development is not considered to significantly affect flood risk.

#### Operation

The proposed development site is located in an area at low risk of fluvial flooding (Flood Zone 1), and a small element of the site is located within Flood Zone 3a (surface water flooding). The existing site is largely hard standing. Supporting information states that due to the nature of the proposals and due to the fact that the site is previously developed, no significant alterations to volume and run-off are envisaged. Surface water outfall will, consistent with the Local Plan, need to be at greenfield run off rates utilising appropriate sustainable drainage systems (SuDS), reducing the potential for flood risk off site.

The above potential flooding impacts are likely to be appropriately dealt with by the proposed development and are not considered to be of such significance that they warrant EIA.

#### Mitigation

The implementation and management of on-site water attenuation and any potential flooding mitigation should be secured through appropriate placement and design of buildings, surface water drainage and sewerage accompanied with where necessary an associated planning condition.

#### Human Health

It is considered that human health (both of existing and new receptors) has been appropriately considered within the relevant topic sections (e.g. water contamination or air pollution) and as such, reference should be made to these sections as required.

#### Land (land take)

The construction and operation of the proposed development will utilise brownfield land to provide new floorspace. This is not considered to generate any significant effects. No discipline specific mitigation has been relied upon for the EIA Screening Opinion.

#### Material Assets

The construction and operation of the proposed development will utilise material assets, but given the scale of the development this is not considered to be substantial. As such, significant effects are not considered to be likely. No discipline specific mitigation has been relied upon for the EIA Screening Opinion.

#### Major accidents and/or disasters

Documentation Accompanying the Planning Application: *A Fire Statement will be required.*

A fire statement will be required in accordance with London Plan policy D12 on fire safety. This will address any potential accidents related to the risk of fire.

It is considered that the risk from major accidents and/or disasters (both of existing and new receptors) has been appropriately considered within the relevant topic sections (e.g. climate change, flood risk) and as such reference should be made to these sections as required.

## **Noise and Vibration**

Documentation Accompanying the Planning Application: *No discipline specific documentation has been provided.*

The closest sensitive receptors are residential homes to the east and south.

### Construction

Machinery used during demolition/construction on site can generate new sources of noise, as well as construction traffic movements in the vicinity. The nearby receptors combined with the new noise emissions, means that there is the potential for adverse effects as a result of construction activities.

Given the scale of the development, standard impact avoidance measures can be implemented to reduce emissions from construction activities, which will be secured through the CEMP. In the context of traffic movements around the site, the level of construction vehicle movements will not be exceptional. No significant effects are therefore anticipated.

### Operation

The site is located within Staples Corner SIL where 24hr industrial activity is supported. Therefore the proposed industrial use is in keeping with the existing character of the wider industrial area. The proposed residential uses will be negligible in light of this, particularly given it is car free. Consideration will however be required to ensure the proposed residential receptors are sufficiently protected from any externally generated noise pollution. Therefore no significant effects are anticipated to warrant EIA.

### Mitigation

Adherence to the CEMP should be secured through a planning condition, the CEMP will include standard mitigation measures to reduce noise emissions. Plant noise (if applicable) should be controlled to local and national guidelines using a planning condition.

Suitable mitigation will be required to be included within the design of the proposed development to ensure that new internal receptors are adequately protected.

Taking account of these matters it is considered that the development will not have significant effects that warrant the need for EIA.

## **Socio-Economic (including population)**

Documentation Accompanying the Planning Application: *No discipline specific documentation of consideration has been given toward socio-economic impacts.*

### Construction

The proposed development would create benefits to local employment though providing temporary employment during construction, with an associated increase in spending in the local and regional area. This is considered to be beneficial, but not significant.

## Operation

The proposal includes a small industrial unit which will provide some full time employment once operational, although this is not significant. There will also be some permanent jobs associated with the residential use, including concierges etc., although again, this will not be significant.

## Mitigation

Financial contributions through S106 planning obligations will be sought to mitigate the effects of increased population/ users, if appropriate. Taking account of these matters it is considered that the development will not have significant effects that warrant the need for EIA.

## **Soil (organic matter, erosion, compaction, sealing)**

### Construction

There is the potential for some loss of organic matter, erosion, compaction and sealing during the demolition/construction phase; however, given the scale of the development and the length of the demolition/construction phase, effects are not considered to be significant.

### Operation

The operation of the completed development is not anticipated to unusually affect organic matter, erosion, compaction and sealing. As such, significant effects are not considered to be likely.

### Mitigation

The implementation of a CEMP during the construction phase will ensure that standard mitigation measures are implemented.

## **Telecommunications**

Documentation Accompanying Planning Application: *Brent local validation requirements require a TV / Radio Reception Assessment to be submitted at planning application stage for tall buildings (30m high or taller) or for proposals that are significantly taller than their surroundings.*

On the basis of the information submitted, it is considered that there is no known significant likelihood at this stage, of detrimental effects from or on telecommunications that would warrant the submission of an EIA.

## **Townscape and Visual Impact**

Documentation Accompanying the Planning Application: *A Design and Access Statement and a Townscape and Visual Impact Assessment will be submitted to support any future planning application.*

The site lies within the vista extension of the London View Management Framework strategic view 5A.2 (Greenwich Park: the General Wolfe statue towards St. Paul's Cathedral). It is also just on the edge of one of Barnets protected viewing corridors of St. Mary's Church at Harrow on the Hill from Golders Hill Park. It is not within one of Brent's protected viewing corridors of the National Stadium Wembley.

## Construction

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

## Operation

The proposal introduces buildings of up to 28 storeys onto the site, which will have visual impact and will impact the local townscape. The site is however located within the Staples Corner Tall Building Zone where the masterplan identifies tall buildings of up to 31 storeys as being appropriate. Whilst the site is located within the vista of one of St. Pauls protected views, it is ~19km distant from the viewpoint and comprises part of its backdrop some way from St. Pauls itself, and therefore significant impacts are not considered to be likely. The site is slightly within Barnets protected view, and as such, the taller element is set out of this area, which only comprises an 8 storey element. It is therefore considered that the proposed development would not result in significant impacts to these views, and that townscape and visual impacts can be adequately addressed as part of the planning application itself. Significant effects therefore are not considered likely in EIA terms.

As such it is important to note, that whilst the effects are not considered to be significant in relation to the EIA Regulations, this does not preclude the Council from taking into account the adverse effects (and their acceptability) when determining the planning application.

## Mitigation

During construction, ensure the erection and maintenance of hoarding. Design, height and massing to reduce potential for adverse impact.

Taking account of these matters it is considered that the development will not have significant environmental effects that warrant the need for EIA.

## Traffic and Transport

Documentation Accompanying the Planning Application: *A Transport Statement including Travel Plan will be required to be submitted with any proposed planning application, in addition to a Servicing and Refuse Management Plan.*

The site has a PTAL of 3. The potential West London Orbital station at Brent Cross West will likely increase PTAL.

National Highways (formerly Highways England) has identified that development in Staples Corner Growth Area should not significantly impact on the operation of the M1 motorway.

## Construction

There will be an increase in the number of vehicles accessing the site during the construction phase, however, given the scale of the development the anticipated numbers are not considered to be substantial. Supporting information states that construction works will be controlled via a CE/TMP. It is considered that any adverse effects can be mitigated through this.

With the implementation of standard mitigation measures, no significant effects are anticipated.

#### Operation

The site is currently used for level parking for the sale of vehicles. The proposed development will be car free for the residential element, and will have a small amount of operational parking for the industrial unit, although this will not be significant.

The Transport Statement and Draft Travel Plan and Servicing and Refuse Management Plan will set out how the site would be serviced when operational, which is consistent with an approach agreed with the local highway authority.

#### Mitigation

A CLP should be secured that includes standard mitigation measures to control transport movements (potentially as part of the CEMP).

Controls on occupants and financial payments should be sought to offset operational effects.

As such no significant environment effects are anticipated to require EIA.

#### **Waste**

Documentation Accompanying the Planning Application: *No discipline specific material has been submitted.*

#### Construction

The site will generate waste, principally building materials during the demolition and construction stages. Waste from demolition will arise from removal of existing buildings, structures and hardstanding, but given the limited scale of existing built form, it is not expected to be significant in EIA terms. The management of construction waste is covered by the Waste Duty of Care Legislation (2016), issued under section 34 of the Environmental Protection Act 1990. The implementation of standard impact avoidance measures will reduce waste from construction activities, which can be secured through the CEMP. No significant effects are therefore anticipated.

#### Operation

The proposal includes several uses, including residential uses, and an industrial unit. These uses will result in the production of normal domestic and commercial wastes, normal in quantity and type, and will need to be separated as per the Council's requirements.

#### Mitigation

Adherence to the CEMP which will include standard mitigation measures should be secured through a planning condition for construction phase, as well as one that seeks to ensure appropriate disposal of waste during construction phase. The Waste Management Plan will ensure adequate measures for waste management are in place prior to and during occupation

#### **Water Quality (Water environment changes, quantity and quality)**

Documentation Accompanying the Planning Application: *This matter will be addressed in a number of areas, Flood Risk Assessment / Drainage Statement, Land Contamination Assessment and the CEMP.*

#### Construction

During the construction process there is the potential to affect water quality through accidental pollution events, such as fuel spills and increased sediment within surface water passing through to adjacent watercourses. The implementation of standard impact avoidance measures should be secured through the CEMP. In addition, the potential of contamination on site could result in pathways either above or below ground being created that lead to watercourses. This will require measures to avoid such potential. With the implementation of standard impact avoidance measures to ensure that the site is adequately protected, no significant effects are anticipated. It is not considered, given the scale of the development and works proposed, that there will be any significant effects on either water quality or hydromorphology during construction.

#### Operation

There is the potential the operation of the proposed development to affect the foul and surface water capacity/ quantity due to an increased demand. Whilst there may be an increase in demand, given the scale of the development, it is not considered to lead to significant effects. There is the potential for pollutants originating from motor vehicles to enter the surface water and ground water systems. Such risk can be mitigated through the inclusion of pollution control measures in surface water drainage systems, which can be secured by condition. It is not considered, given the scale of the development and the implementation of SuDS (refer to Flood Risk section above) that there will be any significant effects on either water quality or hydromorphology once operational.

#### Mitigation

A CEMP should be secured that includes measures to protect against and deal with accidental pollution events. The Preliminary Land Contaminated Risk Assessment will identify if and where contamination is present and measures required to ensure that any construction activity does not increase risk to water quality will be secured through planning condition. The implementation and management of SuDS and associated pollution control mechanisms for surface drainage should be secured through a planning condition.

As such it is not anticipated that the environmental effects will be of such significance to warrant EIA.

#### **Wind**

Documentation Accompanying the Planning Application: *A Wind Microclimate Assessment will be provided.*

#### Construction

It is recognised that throughout the demolition and construction phase of the project, the cranes and the erection of the new structure may affect the local wind microclimate, however these effects are considered to be temporary and not anticipated to be significant.

#### Operation

The proposal will be introducing a building of up to 28 storeys onto the site which is greater than the scale of existing development on site, although this will be in the form of slender towers. As such, some impacts to local pedestrian comfort are anticipated, however, through the use of standard mitigation measures in accordance with the forthcoming wind microclimate assessment, it is not anticipated that these will be likely so as to warrant an EIA.

It is important to note that whilst the effects are not considered to be significant in relation to the EIA Regulations, this does not preclude the Council from taking into account the adverse effects (and their acceptability) when determining the planning application.

### **Cumulative Effects**

The 2017 EIA Regulations requires the consideration of cumulative effects through interactions being the combined effects of individual effects arising as a result of the development and also with other existing development and/or approved development.

In relation to the cumulative effects of the interactions related to the proposed development, taking account of the analysis and commentary above it is not considered that the impacts are such as to be so significant to warrant EIA.

There are a number of major developments in the surrounding area that are likely to be built, as detailed in 'Large Scale Development within the Vicinity'. The proposal in association with these wider developments may have the potential for cumulative impacts. The impacts of this need to be considered when determining if the effects would be so significant as to warrant EIA.

The Council has considered a wide area consisting of Staples Corner Growth Area and other development sites adjacent or within the vicinity, particularly those that might generate transport movements along the North Circular Road. One of the applications identified (Brent Cross Cricklewood Regeneration Area, F/04687/13) as part of the cumulative assessment was subject to Environmental Impact Assessment. The Council has considered the information contained within this assessment related to the individual impacts and also the associated cumulative impacts of the proposals.

### **Demolition/Construction**

The Environmental Statement submitted under F/04687/13 identified negative impacts were likely in relation to noise during the demolition and construction phase. Impacts were identified to existing sensitive receptors (mostly residents) bordering the Site, and as the scheme progresses, at residential phases that have become occupied. No noise impacts were identified to Staples Corner or adjoining residential areas to the west of the A5.

In terms of transport impacts, the Environmental Statement identified potential impacts on road users as a result of additional construction related traffic. Due to the scale of the Brent Cross West development, there is potential for its construction to interact with the proposed development when being built out. Both schemes will be subject to a Transport Management Plans. This will make it incumbent on the applicant to provide measures to minimise the impacts of the construction, taking into account existing permissions.

In line with this, it is considered that no likely significant adverse cumulative construction effects will occur assuming the implementation of standard mitigation measures such as appropriate traffic management measures and construction routing; and maintenance of site hoardings and compliance with the mitigation measures detailed within the CEMP.

It is also assumed that the enabling works, demolition and construction phases associated with the other development schemes would adhere to legislative requirements, industry guidance and best practice as will be the case within the application sites. However, there remains the potential for cumulative effects to arise, particularly with respect to dust and noise.

The construction workers at the construction site of each individual cumulative scheme will have to adopt controls to prevent the significant transfer of airborne pollutants beyond their site boundaries and the use of monitoring to confirm the effectiveness of these measures. Therefore, cumulative effects at existing and future receptor locations would be appropriately managed by the contractors to avoid the occurrence of significant adverse cumulative effects. Cumulative effects during the enabling works, demolition and construction phase are therefore generally considered to be temporary, local and overall not significant.

### Operation

The Environmental Statement submitted under F/04687/13 identified positive impacts were likely in relation to socio-economic impacts, landscape and visual impacts and water resources and flooding during the operational phase. This was due to jobs generated, enhancements to the existing townscape, new habitats being created, and restoration work to the River Brent.

Whilst the proposal will result in additional traffic on the roads, the Environmental Statement anticipated benefits to arise owing to the enhancements to the public transport network including the creation of a new Thameslink Station. The scheme was subject to a Transport Assessment and modelling agreed with TfL and the LB Barnet. This took into account the baseline and committed development in the surrounding area. The existing traffic on the road network was combined with the traffic anticipated to be generated from the future traffic growth. As such, the modelling accounted for a degree of growth in the surrounding area, and this informed the mitigation strategy.

The Environmental Statement states whilst there will be an increase in CO<sub>2</sub> emissions in the short term, all buildings will be built in accordance with the building regulations prevalent at the time of construction. Given the Government's intention to the progressive tightening of the Building Regulations, the CO<sub>2</sub> emissions reduction of the energy strategy is likely to prove to be conservative.

It is considered that the proposed development would not give rise to any significant environmental effects that cannot be mitigated through the relevant pre-commencement conditions, or through the implementation of appropriate mitigation measures attached to the Permission.

With regards to the matters considered in this opinion it is not considered that there will be significant adverse cumulative operational effects when the cumulative developments and the proposed development are operational.

It is anticipated that CIL and S106 and other funding streams from Government and service providers will address capacity issues that might exist in relation to on and off-site infrastructure.