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15th October 2021

Dear Edgware Stone Developments,

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 a proposed development of erection of building ranging in height up to 20 storeys (maximum building height 65m) (plus basement) to provide up to 270 residential units (Use Class C3) with convenience foodstore (Use Class E) and 3no. commercial units (Use Class E) at ground floor (up to maximum 2,000sqm Class E), together with associated basement and ground floor car parking (up to 55 spaces); cycle parking; vehicular access (Carlisle Road / Holmstall Avenue) and highways works (including provision of delivery bay to Carlisle Road / Holmstall Avenue); private amenity space; public realm and landscaping.

Site: Land at 421 and 423 (Symal House) Edgware Road

I write in connection to your screening request submitted on 4th October 2021. 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 7937 6710 or email paul.lewin@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 EIA is required in respect of an application for a proposed development including demolition of No. 421 and 423 (Symal House) Edgware Road and erection of building ranging in height up to 20 storeys (maximum building height 65m) (plus basement) to provide up to 270 residential units (Use Class C3) with convenience foodstore (Use Class E) and 3no. commercial units (Use Class E) at ground floor (up to maximum 2,000sqm Class E), together with associated basement and ground floor car parking (up to 55 spaces); cycle parking; vehicular access (Carlisle Road / Holmstall Avenue) and highways works (including provision of delivery bay to Carlisle Road / Holmstall Avenue); private amenity space; public realm and landscaping.

Site – Land at 421 and 423 (Symal House) Edgware Road

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

Edgware Stone Developments Ltd. requested a screening opinion from London Borough of Brent (the Council) on 4th October 2021. 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 to support the request.

The Existing Site and Surrounding Area

The development site fronts onto Edgware Road and is a roughly rectangular in shape. It is bounded by Holmstall Avenue to the north, and Carlisle Road to the south. The site covers an area of approximately 0.5 ha. The site contains The Locally Listed Symal House Building (423 Edgware Road) which is currently occupied as an office, although has Prior Approval for change of use to 45 self-contained studio flats, in addition to 2 storey upward extension to facilitate the delivery of a further 20 residential units. This is in addition to 421 Edgware Road which is occupied by a vehicle repair workshop, car showroom and a petrol filling station, which is supported by level parking. The lawful use of this site is Sui Generis. Symal House has a landscaped buffer area fronting onto Edgware Road. This includes amenity grassland and a continuous hedgerow including a number of semi-mature trees.

The site is located within Burnt Oak/ Colindale Growth Area, and Colindale Opportunity Area, as well as emerging site allocation policy BNSA1. It is also identified as being appropriate for taller buildings in accordance with emerging policy BD2, being located in part within a Tall Building Zone. The site is not however identified as an Intensification Corridor as is identified in the applicants screening request.

Adjacent land uses include 2 storey semi-detached homes to the north/northwest on Holmstall Avenue, 3 storey flatted development to the east on Edgware Road, and industrial/warehouse and car showroom uses to the south west on Carlisle Road.

The Size and Design of the Proposed Development

The proposed development is for the demolition of existing 421 and 423 Edgware Road and construction of buildings ranging up to 20 storeys in height, and comprising 270 residential

units, in addition to a convenience foodstore and 3 commercial units at the ground floor, delivering up to 2,000sq.m. Use Class E floorspace.

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. This is as it relates to the requirements outlined in schedules 2 and 3 of the EIA regulations. It is noted that the minimal environmental impacts which are likely to arise as part of the proposed development can be identified, and mitigated through the utilisation of recommendations made under the below proposed reports as part of a full planning application.

- Air Quality Assessment.
- Basement Impact Assessment.
- Contaminated Land Assessment.
- Daylight & Sunlight Assessment.
- Design and Access Statement.
- Drainage Strategy and Flood Risk Assessment.
- Ecology Assessment/Biodiversity Net Gain Report.
- Energy and Sustainability Assessment.
- Fire Statement.
- Foul Sewage and Utilities Assessment.
- Geo-Environmental Phase 1 Desk Top Study.
- Heritage Statement.
- Lighting Assessment.
- Noise Assessment.
- Overheating Assessment.
- Planning Statement.
- Townscape and Visual Impact Assessment.
- Transport Assessment and Travel Plan.
- Wind Micro-climate Assessment.

Given the limited detail provided with this screening request, it will be expected that the applicant submits each of these reports at application stage taking account of their proposed recommendations to ensure any environmental impacts are mitigated as far as is practicable.

Previous History

It is important to consider both the existing and approved land use for the proposed development. 423 Edgware Road is currently in use as an office, although under the below approved applications, has permission under prior approval for use for up to 75 self-contained C3 residential units. 421 Edgware Road is in use as a vehicle repair workshop, car showroom and petrol filling station under use class Sui Generis.

20/1311 - Prior approval for change of use from offices (Use class B1) into 45 self-contained studio flats (Use class C3) including the provision for car and cycle parking and refuse storage

21/0132 - Prior approval for the erection of two additional storeys to accommodate 20 residential units on a detached commercial / mixed use building (subject to a legal agreement dated the 29th of July 2021)

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 - 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. 17/2284, granted July 2021] No start on site.
- 1-8 Capitol Way (NEAT Developments) - 500 residential units, across buildings of 4-12 storeys. [Ref. 19/4545, granted June 2021]. No start on site.
- 399 NW9 (FMAS Oriental City) – 520 residential units across 8 buildings (up to 9 storeys). [Ref. 12/2166, granted June 2013]. Residential element completed, on-site school yet to be delivered.
- 381-397 Edgware Road – 4/5/18 storey building, comprising 563sqm retail floorspace and 110 residential units. [Ref. 17/2284, granted July 2021]. No start on site.

Awaiting determination:

- 1 Burnt Oak Broadway – Part 7/8 storey building to provide co-working space and purpose-built shared living units, and café. [Ref. 20/1163, awaiting decision].
- 363 Edgware Road – 165 residential units with commercial use at ground floor. Buildings of 19, 17, 14, 8, 6, and 5 storeys. [Ref. 21/1124, awaiting determination].

The site is located along Edgware Road. This is the LB Brent's boundary which is shared 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.

- 100 Burnt Oak Broadway [LB Barnet] – 100 residential units, 1,718sqm of A1/D2 floorspace in a building of between 4 and 12 storeys. [Ref. 19/1049/FUL, granted April 2020]. Started on site.
- Imperial House (The Hyelm Group) [LB Barnet] – 102 residential units and 499sqm commercial/office floorspace, ranging in buildings from 3-16 storeys. [Ref. 19/2897/FUL, granted October 2020]. Started on site.
- Colindale Station [LB Barnet] – Replacement railway station ticket hall building, mixed use development ranging from 6 to 29 storeys in height comprising 860sqm commercial floorspace and up to 313 residential units. [Ref. 19/0859/OUT, granted March 2020]. Started on site.
- Green Point [LB Barnet] – Addition of 2 storeys to provide 34 residential flats. Building would comprise 10 storeys. [Ref. 20/6267/PNU, granted June 2021]. No start.

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.

Current Local Plan

The current Brent Local Plan consists of the Core Strategy (2010), Site Specific Allocations (2011), Wembley Area Action Plan (2015) and Development Management Policies (2016) Local Plans and the West London Waste Plan (2015). Together these documents provide spatial policies, development management policies and site allocations to guide and manage development in the borough.

Sustainability Appraisals (SA) for all these Local Plan documents were undertaken. 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.

Local Plan to 2041

The Council submitted its draft Brent Local Plan for examination to the Secretary of State on 17th March 2020, following Full Council approval on the 19th February 2020. Examination hearings took place between the 29th September 2020 and 16th October 2020. As a result of this the Council produced a number of proposed main modifications. These were publicly consulted upon from 8th July to 19th August 2021. The Inspectors are currently in the process of assessing the soundness of the proposed final main modifications. Once adopted, this document will be the key strategic document to guide and manage development in the borough until 2041. An Integrated Impact Assessment (IIA) accompanies the new 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.

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 approximately 270 residential units. As such, it exceeds the threshold for 150 dwellings, and therefore 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 include 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 (NO₂) and the 24 hour mean national objective for particulate matter (PM₁₀).

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

Documentation Accompanying the Planning Application

The screening request has not been accompanied with any specific reports. Rather it includes a desk based supporting statement as a proportionate response to the proposed developments environmental impact as it relates to EIA development. It is proposed that as part of a full planning application an Air Quality Assessment will be included. This will respond to the proposed developments impact in relation to the AQMA designation, emerging Local Plan policy BSUI3 and the Brent Air Quality Action Plan. This will be in an effort to mitigate any potential impacts so far as is practicable in accordance with existing standards and policy. As it is within a Growth Area, emerging policy requires the development to be air quality positive.

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 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. This is acknowledged in the air quality assessment that concludes that the effect of dust soiling and PM₁₀ can be reduced to negligible with the implementation of appropriate mitigation measures – these measures will need to be included in any forthcoming air quality assessment. 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.

Operation

Air quality emissions during operation will be from new traffic generation and the CHP. Consideration also needs to be given to the potential effects on the new internal receptors given the location for the proposed development adjacent to a main road.

Again, it is proposed that as part of any forthcoming full planning application a Transport Assessment and Travel Plan are to be included. These will need to assess the impacts of the proposed development on local transport networks with an aim to reduce impacts as far as is practicable in accordance with the Mayor's strategic transport targets. It is considered unlikely that as a result of further consideration as part of this process the resulting application will have significant impacts and is therefore likely to be acceptable in EIA terms.

With respect to the new internal receptors, consideration must be given to the site location within an AQMA. Based on any outcomes of the forthcoming air quality assessment, mitigation measures would be required in order to mitigate the impact of poor air quality on the future occupants of the proposed development at nearly all the modelled receptor locations.

With the implementation of standard mitigation measures, significant effects are therefore not anticipated.

Mitigation

A CEMP should be secured that includes standard mitigation measures to reduce emissions.

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. Monitoring is not recommended in the air quality report - however, continuous visual assessment of the site should be undertaken and a complaints log maintained in order to determine the origin of a particular dust nuisance.

Suitable operational mitigation to be secured through a planning condition to ensure that new internal receptors are adequately protected.

Built Heritage

Documentation Accompanying the Planning Application

The screening request has not been accompanied with any specific reports. Rather it includes a desk based supporting statement as a proportionate response to the proposed developments environmental impact as it relates to EIA development. It is proposed that as part of a full planning application a Heritage Statement will be included. This will respond to the proposed development's impact in relation to the Locally Listed status of the Symal House building, and how the proposed development has responded to this and overcomes the NPPF requirements for impact on non-designated heritage assets.

Roe Green Conservation Area 500 metres away, and Buck Lane Conservation Area 800 metres. The only listed building within close proximity to the building is the Grade II listed Mecca Bing Hall along Burnt Oak Broadway 150m to the North. It is considered that views are likely to have limited impact, but that this will be better determined through the proposed Town-scape study. Either way, impacts are not likely to push the proposal into EIA development.

Construction

The proposal includes the demolition of Symal House. This is a Locally Listed heritage asset. As such the construction will include the total demolition and removal of the heritage asset and its value from the site. Paragraph 203 of the NPPF requires a balanced judgement when it comes to development impacting non-designated heritage assets. This will need to include consideration toward the wider benefits of any proposed scheme. This will need to be considered further as part of any forthcoming planning application. There however will be an adverse impact through a loss of a non-designated heritage asset. This is not considered to be so significant in scale that it warrants EIA.

Operation

The height of the proposed development will be 65m, and therefore a greater scale than that previously on site, as well as much of the surrounding area.

The site is not located within a Conservation Area. Roe Green and Buck Land Conservation areas are 500 and 800m away respectively. The only listed building within close proximity to the building is the Grade II listed Mecca Bing Hall along Burnt Oak Broadway 150m to the North. The Council considers that the proposal will lead to adverse effects on built heritage principally through the loss of the existing non-designated heritage asset, with further potential impact on nearby Conservation Areas depending on results from the forthcoming Town-scape study, however given the scale of the development and the urban nature of its location, significant effects are not considered likely.

It is noted that to further mitigate against any potential impacts, a Townscape Study will accompany any forthcoming application, taking into consideration impacts upon local heritage. This will help guide the form of the proposed development, responding to identified assets that might otherwise be subject to harm through a design-led approach.

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. Rather it includes a desk based supporting statement as a proportionate response to the proposed developments environmental impact as it relates to EIA development. It is proposed that as part of a full planning application an Energy and Sustainability Statement will be included.

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 a Circular Economy Statement in accordance with

policy SI7 of the London Plan, and achievement of net zero carbon in accordance with policy SI2 of the London Plan.

Operation

The Energy and Sustainability Statement 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 Circular Economy Statement, and 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.

Contaminated Land

Documentation Accompanying the Planning Application

An environmental assessment is yet to be undertaken. Given the long term use of the site as a car repair workshop, car showroom and petrol filling station, it is considered likely that the land is contaminated and may require further works including remediation. Section 10(b) of the EIA regulations make specific reference to 'high levels of contamination' as a reason for requiring EIA for schedule 2 development. The proposed uses are unlikely to result in high contamination levels. It is therefore considered that the scale of the proposal on a 0.5ha plot is not significant so as to warrant an EIA.

To fully address this at planning application stage, the applicant will submit a Contaminated Land report. This will provide necessary recommendations for mitigation to allow the proposed development to be safely delivered on-site.

Construction

Additional standard mitigation measures will also 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 conditions in agreement with the Council's Contaminated Land Officer.

Daylight, Sunlight and Overshadowing

There are a number of sensitive receptors in close proximity to the proposed development site, including low density semi-detached and flatted residential development.

Documentation Accompanying the Planning Application

No supporting technical assessment has been provided as part of this screening request. The desk based supporting statement does not consider the impact of the proposed development upon the day/sunlight or overshadowing of existing/ future receptors. It is considered that, given proximity to vulnerable residential receptors to the north west, north and east of the site, this be a key consideration in the Council's determination of any similar forthcoming planning application. Although any potential harm may occur, this is not to the extent that it is so significant for the proposed to be considered EIA development.

In order to overcome any concern, the applicant will include a daylight & sunlight assessment as part of any forthcoming application. This should also consider given the allocation of these sites for residential purposes the cumulative impacts of adjacent development/ future site potential, ensuring that the proposed development does not unfairly impact upon the prospect of neighbouring site redevelopment. This will need to be robust in demonstrating how the proposal has responded to site constraints and evolved as a result of this study.

Construction

During construction, there will be a change in the provision of daylight/sunlight due to the construction equipment (i.e. cranes) and the erection of the new building.

The construction equipment will be temporary and short-term, and therefore not considered to be significant.

The erection of the new building 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 operation of the proposed development will introduce buildings up to 65m onto the site. Due to the proximity of nearby sensitive receptors and the height there is the potential for the proposed development to affect surrounding receptors.

It is acknowledged that some properties may be adversely affected by the proposed development, however given the number of receptors and the site's urban location, the effects are not considered to be significant. This is assuming any forthcoming application pays due attention to any recommendations arising from a robust daylight & sunlight assessment.

With respect to onsite receptors, no internal assessment has been submitted with the planning application. Again, such an assessment will also be required at application stage to satisfy the Council's concerns with regard to daylight and sunlight.

Mitigation

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

Biodiversity (including flora and fauna)

Documentation Accompanying the Planning Application

No documentation has been provided as part of the screening request.

Construction

The site includes limited green space. 423 Edgware Road has a buffer of green landscaping separating it from the Edgware Road. This is predominately amenity grassland, however, also includes mixed hedgerow and a number of semi-mature trees. As part of any forthcoming application, and in accordance with national policy, any forthcoming application will need to demonstrate how it will result in a biodiversity net gain. The London Plan Urban Greening Factor (policy G5) will also assist in delivering gains on site where current biodiversity levels are low. Applications should first look to retain biodiversity where it has had time to establish itself prior to proposing delivery of replacements.

The nearest nationally recognised high value ecological asset is the Welsh Harp/ Brent Reservoir SSSI. This is approximately 2 kilometres from the site. Natural England have previously raised concerns about the potential for tall buildings at Staples Corner as proposed in the draft Local Plan to impact on bird flight paths to the possible detriment to the integrity of the SSSI. However, no such concerns have been raised in association with the Tall Buildings Zone in which the proposal site sits.

As such, it is considered that the proposed application, being on a small brownfield site with limited current ecological assets and sufficient distance from recognised assets is not so significant in terms of impact to be identified as EIA development.

Operation

There is the potential for the proposed development to beneficially contribute to biodiversity of the local area through the implementation of ecological enhancement measures e.g. by including swift boxes on the roof of the new development. Whilst this is considered to be beneficial, this is not considered to be significant.

Mitigation

There are no designated sites (SSSI or LNR) within sufficient range of the site to be affected by the construction or operation of the site. Measures should be proposed to protect any retained on site biodiversity assets throughout the development process.

Further survey requirements

An Extended Phase 1 Survey is recommended to confirm the findings of the desk-based appraisal and determine the presence / absence of any protected or invasive species. In addition this survey should assess the buildings' potential to support roosting bats or nesting birds.

Mitigation

There is the potential to effect environmental enhancements, as required by the NPPF London and Local Plan policy, to provide net gains in biodiversity.

Summary- Ecology

As such, it is considered that the proposed application, being on a brownfield site with limited potential to significantly impact on biodiversity assets, is not considered EIA development.

Flood Risk

Documentation Accompanying the Planning Application

No Flood Risk Assessment (FRA) has been submitted with the information submitted with the screening request. The site is located within Fluvial Flood Zone 1 with parts in Zone 3a for surface water flooding. It is therefore considered in parts to be at high risk to flooding. As such, and in accordance with paragraph 167 of the NPPF, any forthcoming application will need to be accompanied by an FRA. Current flooding potential is likely a result of extensive surrounding impermeable land resulting in the accumulation of rain water from the site and its surrounding areas.

Construction

Given the scale of the development 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 high risk of flooding. The existing site is largely hard standing and impermeable. Redevelopment of the site, in accordance with the recommendations of the required FRA and delivered to modern standards in consideration of climate change, is likely to result in the improvement of site permeability for rainwater attenuation and a sequential approach to the location of buildings, with associated mitigation measures to reduce the potential risk of flooding on site. This will be in accordance with emerging Local Plan policy BSUI3.

In addition, 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.

Thames Water has indicated that the draft Local Plan site allocation is likely to require local upgrades to the waste water network. If necessary, these are likely to be required to be operational before occupation of the building commences.

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 a residential homes and commercial 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

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

A Noise Assessment has not been submitted with the screening request. The site is adjacent to the Edgware Road and a number industrial premises which are likely to impact the proposed receptors as it relates to noise. The supporting statement identifies noise as a potential impact on and by the development. This will be considered further as part of a full planning application.

Construction

Machinery used during demolition/construction can generate new sources of noise and vibration, as well as construction traffic movements. The nearby receptors combined with the new noise emissions and periodic vibration, 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 and vibrations from construction activities, which will be secured through the CEMP. The works will be required to adhere to the Council's Code of Construction Practise (CoCP) (e.g. restricting the time at which works can be undertaken) which ensures that adverse effects are appropriately controlled and minimised. No significant effects are therefore anticipated.

Due to the size of the development, the number of construction vehicles required is considered to be relatively small. No significant effects are therefore anticipated.

Operation

The proposed development will include provision for up to 55 car parking spaces. Compared to the site's existing use, being occupied by employment uses and a petrol filling station, this is considered to be insignificant. In terms of noise, on site vehicle usage is considered to be insignificant when considered against the ambient noise generated by the adjacent Edgware Road.

The proposed residential use is not considered to be inherently noisy. Some noise may be generated from the operation of mechanical plant and building services, but plant noise emissions will be required to meet local policy requirements and British Standards. Adherence to these values will ensure that new and existing receptors are not adversely affected, and will ensure that there will be no significant effects.

There is the potential for new residents to be affected by adverse noise due to the site's location. It is likely however, that new residents can be protected through the appropriate design of the proposed development. The proposed development can therefore be designed with consideration to the location of the development and the potential noise implications – secured through planning conditions.

The proposal also includes the inclusion of a convenience foodstore and a number of smaller scale commercial outlets in line with the site's status as a local employment site. It is considered that as a result of a thorough design-led full planning application, that impact on existing/ proposed and future receptors at this site can be mitigated satisfactorily as it relates to proposed and existing noise generating constraints.

No significant effects are therefore anticipated.

Mitigation

Adherence to the Council's CoCP should be secured through a planning condition, as well as a CEMP that includes standard mitigation measures to reduce noise emissions. Plant noise should be controlled to local and national guidelines using a planning condition.

Suitable mitigation required to be included within the design of the proposed development to ensure that new internal receptors are adequately protected. Such mitigation measures may include high specification glazing and insulation, as well as acoustic trickle vents, air bricks or mechanical ventilators, in order to provide adequate ventilation to the standards.

Socio-Economic (including population)

Documentation Accompanying the Planning Application

No discipline specific documentation of consideration has been given toward socio-economic impacts. This should be further considered going forward.

Construction

The proposed development would create benefits to local employment though providing temporary employment during construction. Construction of a significant development project such as this will provide a wide range of employment for local residents both over the short and long term, and at a range of income levels. This is considered to be beneficial, but not significant.

Operation

The proposed development would provide permanent employment once operational. This includes the convenience foodstore and the smaller commercial units. It is unclear how the proposed provision compares with existing on-site employment levels/ quality. Under emerging Local Plan policy BE3 it will be anticipated that the proposed employment (Class E (g) and Sui Generis replacement floorspace (except for that subject to prior approval) should be the maximum viable amount that can be achieved in order for the proposed mixed use residential scheme to be considered acceptable. The provision of the non-residential floorspace component of the scheme is considered beneficial but not significant.

Community Infrastructure Levy (CIL) payments will be sought to offset the effects of the development. These financial contributions will mitigate adverse effects, so that significant effects are unlikely.

Mitigation

Financial contributions will be sought to mitigate the effects of increased population/users.

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 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

A Baseline Television and Radio Signal Survey and Television and Radio Reception Impact Assessment will need to be submitted with the planning application. Local mitigation measures may be required to mitigate any adverse impacts. Nevertheless, significant effects are not considered to be likely to warrant EIA.

Townscape and Visual Impact

The site does not lie within a London View Management Framework strategic view, nor within Brent's protected viewing corridors of the National Stadium Wembley, or within the protected viewing corridors of neighbouring boroughs. As mentioned previously however, as a taller building it may have the potential to impact upon nearby conservation areas and listed buildings. As such, a Townscape study will be required so as to mitigate against this potential.

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 height of the proposed development will be 65m and therefore a greater scale than that previously on site, as well as much of the surrounding area.

The Council considers that the current planning application will lead to some adverse effects on townscape and views, however given the scale of the development and the urban nature of its location, significant effects are not considered likely in EIA terms. The forthcoming Townscape study will help put this into perspective/ context, providing suitable recommendations towards its mitigation at a local level.

Mitigation

During construction, ensure the erection and maintenance of hoarding.

Traffic and Transport

The site is located within an area with a public transport accessibility level (PTAL) of 3/4.

Documentation Accompanying the Planning Application

No documentation has been provided. A supporting statement has been included as part of the screening request. A more detailed Transport Assessment will accompany any forthcoming planning application.

Construction

The supporting statement does not include any consideration of transport impacts during the construction phase. 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.

It is considered that any adverse effects can be mitigated through a construction logistics plan (CLP) (potentially included as part of the CEMP) to control transport movements.

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

Operation

The proposal will generate traffic with up to 55 car parking spaces and associated servicing movements for the non-residential and residential floorspace however, this is not considered to be significant.

Being within a high PTAL location of 3/4 the proposed development's residential elements will likely be required to be car free if not car-lite in accordance with Local and London Plan policy. It will therefore need to be demonstrated by any forthcoming application that car parking for the non-residential elements has also been reduced as far as is practicable. As

such, the preliminary statement notes that the proposal is unlikely to have significant impacts on the highway capacity or result in requirements for further highways improvements. As such, it is not considered that the proposal represent EIA development.

Mitigation

A CLP should be secured that includes standard mitigation measures to control transport movements.

Clauses within leases of residential occupiers to exclude their ability to apply for on-street residents' car parking in the vicinity. Car-share or car club facilities on site or in the vicinity. Financial payments should be sought to offset operational effects, such as the necessity for the introduction of residents' parking permit schemes in the adjacent area, or contributions to improvements in capacity/ quality of local bus services.

Waste

Documentation Accompanying the Screening Request

No waste assessment has been submitted with the request, but the screening opinion supporting statement does provide information on the proposed refuse storage.

Construction

The supporting statement identifies that any waste arising through demolition/ construction will be managed in accordance with a Construction Management Plan which can be secured via condition.

In addition, the implementation of standard impact avoidance measures will reduce waste from construction activities further, which can be secured through the CEMP. The works will also be required to adhere to the CoCP which ensures that adverse effects are appropriately controlled and minimised. No significant effects are therefore anticipated.

Operation

The planning statement does conclude that the waste generated as a result of residential/ commercial occupation will be stored on site, and are not anticipated to be significant and will not include hazardous waste.

The decision notice should include suitable conditions to ensure that there is sufficient capacity for the scale of development. A Site Waste Management Plan (SWMP) should also be secured through a planning condition. With the implementation of these mitigation measures, no significant effects are anticipated.

Mitigation

Adherence to the Council's CoCP should be secured through a planning condition, as well as a CEMP that includes standard mitigation measures.

Sufficient operational waste storage and a SWMP, should be secured through planning conditions.

Water Quality (hydromorphological changes, quantity and quality)

Documentation Accompanying the Screening Request- none

No standalone water quality assessment has been submitted, neither was there any reference to this within the material submitted.

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. 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 quantity 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. It is not considered, given the scale of the development and the implementation of SuDS (refer to Floor 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 implementation and management of SuDS, together with any necessary improvements to local sewerage capacity prior to occupation should be secured through a planning condition. This is normal practice for a major application.

Wind

Documentation Accompanying the Planning Application: none. (Massing / heights not yet finalised)

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 operation of the proposed development will introduce new buildings onto the site that will be up to 20 storeys in height. Therefore there may be adverse effects on the existing wind conditions. This can be assessed throughout the normal planning process. Mitigation measures can be incorporated into the development to reduce the impacts on those within and adjacent to the development to acceptable levels.

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

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

Documentation Accompanying the Planning Application

The cumulative impact assessment submitted with the screening opinion application identified 8 extant planning applications, in addition to 2 waiting determination within the vicinity and placed weight on the consideration/ acceptability of the impacts of wider development through the Local Plan's Sustainability Appraisal identifying the site's allocation and the wider Growth Area designation.

The Oriental City Development south of the site at 399 Edgware Road delivered 520 residential units up to 9 storeys in height, in addition to substantial commercial floorspace and was subject to an EIA assessment. The Council has considered the information contained within the SA and EIA assessments related to the individual impacts and also the associated cumulative impacts of the proposals.

Demolition/Construction

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

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.

Given the scale of the proposed development, and the extant permissions within the immediate vicinity for taller buildings, it is likely that the proposed development will have a cumulative impact upon the existing town-landscape. In the context of the changing urban landscape of London, in which tall buildings have become a more prevalent feature in suburban locations, together with the limited prevalence of designated heritage assets within the vicinity, the impacts are no so significant for the development to be regarded as EIA development.

It is anticipated that CIL and S106 will address capacity issues that might exist in relation to on and off-site infrastructure