

Jon Grantham
LUC

BY EMAIL

26th April 2016

Dear Mr Grantham

Re: Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 5 (1) 2011 and Amendment Regulations 2015: Request for EIA Screening Opinion for the redevelopment of Stonebridge School and the Annex Site

Thank you for your letter dated 7th January 2016, in which you requested that the planning authority adopt a screening opinion of The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011, as amended, in respect of the planning application for the proposed redevelopment of the aforementioned site.

The proposed development is for the redevelopment of Stonebridge School and Annex described as a: *'Hybrid planning application comprising: Full planning permission for the demolition of the Former Adventure Playground; the construction of a two-storey building with first floor walkway connecting to Stonebridge Primary School (use class D1); reconfiguration of Stonebridge Primary School's playground including the provision two Multi-Use Games Areas and the erection of new perimeter fencing; the reconfiguration of Shakespeare Avenue to connect to Hillside and the creation of 1.2ha of public open space. Outline planning permission for the erection of a part 3, 4 and 6-storey apartment block comprising 16x 1bed, 25x 2bed and 10x 3bed flats (use class C3) at Hillside and 22x 3-storey houses (use class C3) along Milton Avenue with all matters reserved.'*

Having considered the proposals as detailed in your letter, Brent Council is of the opinion that the application does not fall within Schedule 1 Development of the Environmental Impact Assessment Regulations 2011 but within Schedule 2 Development, Part 10, Infrastructure Projects (b) – Urban development projects. The applicable thresholds for this category of development are if; (i) the development includes more than 1 hectare of urban development which is not dwellinghouse development; (ii) the development includes more than 150 dwellings; and (iii) the overall area of the development exceeds 5 ha. The proposed development, comprising 73 dwellings and a school extension of 0.15ha, falls below these thresholds.

Brent Council has also given consideration to the characteristics of the development, its location and potential impact as set out in Schedule 3 of the Environmental Impact Assessment Regulations 2011 and Planning Practice Guidance. Planning Practice Guidance indicates the types of case in which, an EIA is more likely to be required. It states:

'Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination.'

EIA is more likely to be required where:

*'(i) the area of the scheme is more than 5 ha; or
(ii) it would provide a total of more than 10,000m² of new commercial floorspace; or
(iii) the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).'*

'Account is also to be taken of the physical scale of such developments, potential increase in traffic, emissions and noise.'

(Reference: National Planning Practice Guidance, Environmental Impact Assessments, Annex: Indicative Screening Threshold Paragraph 58)

Ecology and Nature Conservation

Planning Practice Guidance states, in general, the more environmentally sensitive the location, the lower the threshold will be at which significant effects are likely. Environmentally sensitive locations are considered to comprise:-

- a) Sites of Special Scientific Interest, any consultation areas around them (where these have been notified to the local planning authority under article 10 (u)(ii) of the GPDO), land to which Nature Conservation Orders apply and international conservation sites; and
- b) National Parks, the Broads, Areas of Outstanding Natural Beauty, World Heritage Sites and scheduled monuments.

There are no areas which have an ecological designation as listed above on or immediately around the site. I am of the view that the proposed development would not cause any significant adverse impacts.

Traffic related impacts-Movement and Safety

The council does not consider that the development will result in significant impacts on highway capacity to warrant an EIA related to this issue. The council accepts that the development will lead to some traffic and air pollution within the vicinity of the development but that the impact is not significant when taking into account the existing situation should the existing building be occupied.

Contamination

The site does not have a history of industrial use, therefore the risk of contamination is considered limited. It is not considered to be large enough, complex or unusual enough to require an EIA related to this issue.

Archaeology and Architectural Context

The site is not located within an Archaeological Priority Area (as defined on the UDP policies map). The development includes an extension to the Grade II listed Stonebridge School and will impact on the setting of this building. However, the impact on the listed building will need to be fully assessed through a Design and Access Statement and associated Heritage Statement. The development is not considered to be large enough, complex or unusual enough to require an EIA related to this issue.

Air Quality and Noise

The site falls within Brent's Air Quality Management Area. The development is not likely to release significant pollutants or hazardous, toxic or noxious substances into the air and the proposed use is not

predicted to have a significant effect upon air quality or traffic generation in the area which would require an EIA related to this issue.

It is anticipated the proposal will result in an increase in noise levels during construction. However, the noise levels are not considered to be significant enough to warrant an EIA in respect of this issue.

Other impacts

The council has assessed other possible impacts and effects of the development, and considers that there are none that are significant enough to warrant an EIA.

In conclusion, having assessed the proposals in light of the criteria set out in Annex 'Indicative Screening Threshold' of National Planning Practice Guidance described above and the likely impacts of the proposals, the Local Planning Authority does not consider that the proposal for the mixed use development requires an Environmental Impact Assessment (EIA).

Date of Decision: 27th April 2016

On behalf of the Council of the London Borough of Brent



Paul Lewin
Planning Policy & Projects Manager
Planning and Regeneration
Brent Council

SCREENING CHECKLIST

(taken from Guidance on EIA: Screening, European Commission, June 2001)

Summary of features of project and of its location indicating the need for EIA

Questions to be Considered For further guidance on factors to be considered see the more detailed questions listed in the Scoping Guidance	Yes / No / ? Briefly describe	Is this likely to result in a significant effect? Yes/No/? – Why?
1. Will construction, operation or decommissioning of the Project involve actions which will cause physical changes in the locality (topography, land use, changes in waterbodies, etc)?	Yes – the development will introduce residential development and an extension to the school.	No the form of development being between 3 and 6 storeys, is broadly consistent with the scale of new development in the surrounding area. It will not result in such a significant change in character to warrant an EIA.
2. Will construction or operation of the Project use natural resources such as land, water, materials or energy, especially any resources which are non-renewable or in short supply?	Yes – only those typical of construction activities within an urban area, but limited amounts of non-renewables such as oil based fuels. The majority of materials are existing materials are likely to be recycled which is also true of the new materials required should the proposed building be redeveloped in the future.	No – the construction of this proposed development in this location is not predicted to have a complex or unusual effect and therefore would not have a significant effect on natural resources.
3. Will the Project involve use, storage, transport, handling or production of substances or materials which could be harmful to human health or the environment or raise concerns about actual or perceived risks to human health?	No - the proposed development will not involve the use, storage, transport or production of substances or materials which could be harmful to people or the environment.	No – as the proposed use for the redevelopment of the site will not have a significant effect on human health or the environment.
4. Will the Project produce solids during construction or operation or decommissioning?	Yes –There will be waste produced from construction.	No – mitigation to be agreed prior to works.
5. Will the Project release pollutants or any hazardous, toxic or noxious substances to air?	No –There are no elements of the proposed development that will result in the generation or release of noxious, hazardous or toxic substances to air.	No –It is likely the developers will be use the Considerate Constructors scheme consequently there will not be any environmental nuisance in respect to significant release of pollutants or contaminants.
6. Will the Project cause noise and vibration or release of light, heat energy or electromagnetic radiation?	Noise and some vibration may be generated by construction and demolition, but this can be managed by conditions.	No – The effects are not predicted to be significant or unusual. Noise, and light will be generated but these effects are not predicted to be significant in this context.
7. Will the Project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?	No, the site does not have a history of industrial use.	No – The risk of contamination is limited and would not be so significant enough to warrant an EIA.
8. Will there be any risk of accidents during construction or operation of the Project which	No – the construction and operation of the site do not	No – It is considered that there would be no significant

could affect human health or the environment?	involve the use of high risk substances or the use of high risk technologies.	risk of accidents as a result of the end use of the development.
9. Will the Project result in social changes, for example, in demography, traditional lifestyles, employment?	No, the amount of housing proposed will not result in social change.	No in the context of the wider regeneration of Stonebridge, the changes in floorspace are not significant.
10. Are there any other factors which should be considered such as consequential development which could lead to environmental effects or the potential for cumulative impacts with other existing or planned activities in the locality?	No.	No.
11. Are there any areas on or around the location which are protected under international or national or local legislation for their ecological, landscape, cultural or other value, which could be affected by the project?	No.	No.
12. Are there any other areas on or around the location which are important or sensitive for reasons of their ecology e.g. wetlands, watercourses or other waterbodies, the coastal zone, mountains, forests or woodlands, which could be affected by the project?	Yes the canal feeder to the east of the sites is a Grade II Site of Importance for Nature Conservation.	No, the size of the site, set back from the feeder and its orientation mean impacts are unlikely to be significant.
13. Are there any areas on or around the location which are used by protected, important or sensitive species of fauna or flora e.g. for breeding, nesting, foraging, resting, overwintering, migration, which could be affected by the project?	An ecological assessment and bat survey will need to be undertaken of the canal and disused scrub to the south of the school.	The potential for sensitive species will need to be fully assessed.
14. Are there any inland, coastal, marine or underground waters on or around the location which could be affected by the project?	No	No
15. Are there any areas or features of high landscape or scenic value on or around the location which could be affected by the project?	No	No
16. Are there any routes or facilities on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the project?	Yes, the site is on a prominent street with high levels of public transport accessibility/movement that is used by the public for access to Stonebridge School.	Based on the information provided access to the school will be maintained.
17. Are there any transport routes on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the project?	Hillside Road is a well used road.	No, in the short term construction traffic and its movement/management may have an impact on the local highway network, but this is not considered to be significant.
18. Is the project in a location where it is likely to be highly visible to many people?	Yes – the site is visible from Hillside Road a busy road connecting Stonebridge to the North Circular Road.	Yes, the location will be highly visible from passing vehicles.
19. Are there any areas or features of historic or cultural importance on or around the location which could be affected by the project?	Stonebridge School is a Grade II listed building.	There will be impacts on the setting of the listed building.
20. Is the project located in a previously undeveloped area where there will be loss of greenfield land?	Yes – part of the development will be on open space.	Through reconfiguration of the site it is proposed to reprovide the open space.

21. Are there existing land uses on or around the location e.g. homes, gardens, other private property, industry, commerce, recreation, public open space, community facilities, agriculture, forestry, tourism, mining or quarrying which could be affected by the project?	The land around the school is dominated by residential uses, but includes a number of community facilities including the school and sports centre.	It is considered that the main issues in relation to existing uses is likely to be visual impact.
22. Are there any plans for future land uses on or around the location which could be affected by the project?	Yes. The site is part of on-going regeneration plans for Stonebridge.	The development is part of a later phase of the regeneration programme.
23. Are there any areas on or around the location which are densely populated or built-up, which could be affected by the project?	The surrounding is dominated by residential development.	Local scale visual impact of the development is likely to be the main effect on the area.
24. Are there any areas on or around the location which are occupied by sensitive land uses e.g. hospitals, schools, places of worship, community facilities, which could be affected by the project?	The Stonebridge Primary School is a sensitive use.	The area is already predominantly residential. The introduction of further residential development is not likely to significantly impact on this sensitive use.
25. Are there any areas on or around the location which contain important, high quality or scarce resources e.g. groundwater, surface waters, forestry, agriculture, fisheries, tourism, minerals, which could be affected by the project?	No	No
26. Are there any areas on or around the location which are already subject to pollution or environmental damage e.g. where existing legal environmental standards are exceeded, which could be affected by the project?	Yes – the site is within an Air Quality Management Area.	The impact of the construction phase will be temporary and dealt with via a construction management plan or conditions related to a transport assessment so as not to increase congestion. After the construction phase the development could increase the amount of private car transport/congestion impacts related to the site due to an increased number of residential units, however, detrimental impacts can be mitigated by a travel plan which promotes sustainable transport modes.
27. Is the project location susceptible to earthquakes, subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions e.g. temperature inversions, fogs, severe winds, which could cause the project to present environmental problems?	No	No

The **Screening Checklist** provides a list of questions to help identify where there is the potential for interactions between a project and its environment.

These questions have been considered for each “Yes” answer in the **Screening Checklist** and the conclusion and the reasons for it noted in the checklist. The questions are designed so that a “Yes” answer will generally point towards the need for EIA and a “No” answer to EIA not being required.

Questions to be Considered

1. Will there be a large change in environmental conditions?
2. Will new features be out-of-scale with the existing environment?
3. Will the effect be unusual in the area or particularly complex?
4. Will the effect extend over a large area?
5. Will there be any potential for transfrontier impact?
6. Will many people be affected?
7. Will many receptors of other types (fauna and flora, businesses, facilities) be affected?
8. Will valuable or scarce features or resources be affected?
9. Is there a risk that environmental standards will be breached?
10. Is there a risk that protected sites, areas, features will be affected?
11. Is there a high probability of the effect occurring?
12. Will the effect continue for a long time?
13. Will the effect be permanent rather than temporary?
14. Will the impact be continuous rather than intermittent?
15. If it is intermittent will it be frequent rather than rare?
16. Will the impact be irreversible?
17. Will it be difficult to avoid, or reduce or repair or compensate for the effect?