

Claire Hammond  
Development Director  
St George Developments Limited  
St George House  
16 The Boulevard  
Imperial Wharf  
Fulham  
SW6 2UB

## By email

12th September 2017  
Our Ref: 17/1082/PRE

Dear Ms Hammond,

### **Proposed Redevelopment of Northfields Site: Environmental Impact Regulations 2017 Regulation 15 Local Planning Authority Scoping Opinion**

Thank you for your e-mail of the 11<sup>th</sup> August 2017 requesting the Council's scoping opinion on the Environmental Statement to be submitted in association with a planning application for the redevelopment of the Northfields site. To assist, you submitted an EIA Scoping Report August 2017 prepared by AECOM. The Council made this Scoping Report available on its website. The Council consulted Statutory Consultees as identified in the EIA Regulations 2017 on the proposed scope. It also consulted others it considered whose input might assist in identifying a suitable scope for the submitted Environmental Statement. There was a three-week period for all to respond. Representations were received from the Canal and River Trust and Thames Water and are appended. The Council considered these in the Scoping Opinion set out below.

#### **Council's Scoping Opinion.**

The Council considers that the EIA Scoping Report 2017 by AECOM is a comprehensive document that is consistent with the requirements of the regulations and associated guidance. It builds on earlier draft informal worked submitted to the Council by AECOM. Its contents reflect responses supplied by the Council including matters to not be included within the scope of the Environmental Assessment. To that end the scope that it sets out for the purposes of the Council's formal screening opinion is for the most part a sufficient basis for the addressing the content of the Environmental Statement. The Council indicates in relation to the specific matters listed below where there is a need for amendment or additions.

## **4.2.2 Regional Planning Policy & Guidance**

Housing SPG (2016). Updated in August 2017 in relation to affordable housing requirements.

## **4.2.3 Local Planning Policy & Guidance**

Although within Brent, given the proximity of the site to the Old Oak and Park Royal Development Corporation's boundary, the Environmental Statement needs to take account of OPDC's emerging Local Plan policy context. In addition, the Development Corporation has also adopted an Opportunity Framework for its area. The site is also close to the boundary with LB Ealing. This may also have Local Plan policies that influence adjoining sites and consequently the context within which the site sits.

Brent also has an existing Design SPG17 that is pertinent to this site as well as an emerging one in draft SPD1.

## **6.1 Overview**

In relation to foreseeable major disasters or accidents set out in the third paragraph, there is a need to acknowledge that a flood risk from reservoirs exists as set out on the Environment Agency's website. For the most part however, the boundary is consistent with fluvial zones 3 and 2 as identified in the Council's Strategic Flood Risk Assessment. As such, its impact is perhaps also best addressed in the Water Quality, Flood Risk and Water Resources ES Chapter and the Flood Risk Assessment that will be prepared in support of the planning application.

## **6.9 Transport and Access**

As identified in the Canal and River Trust's response, the impact on the Grand Union Canal as a result of the development as a movement route needs to be considered.

### **6.9.2 Potential Impacts**

**Pedestrian Amenity.** The emphasis placed on increasing cycling as a modal share and the known dangers of construction HGVs to cyclists requires widening this element of the assessment to pedestrian and cyclist amenity.

**Driver delay.** Again, the acknowledged proximity of bus routes together with an emphasis on increasing public transport patronage as a modal share requires widening this element of the assessment to journey delay for road users.

These assessments should be undertaken at all stages of the development.

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

As identified in the Canal and River Trust's response, the Grand Union Canal needs to be recognised as a sensitive receptor in relation to ecology and user amenity.

### **6.15 Water Resources, Drainage and Flood Risk**

As identified in the Canal and River Trust's response, consideration needs to be given to the risk posed by the failure of canal infrastructure.

## 6.15.2 Potential Impacts

The points raised by Thames Water in relation to impacts on water infrastructure should be incorporated into the Assessment.

## 7.1 Energy & Sustainability

The second paragraph mentions appropriate routes to achieving BREEAM Very Good certification. Brent's requirement set out in Policy CP19 Brent Strategic Climate Change Mitigation and Adaptation Measures is for Excellent.

As identified in the Canal and River Trust's response, given its proximity to the site, its reasonable to assume that consideration should be given to the canal's potential to be used for heating and cooling of adjacent buildings as part of the option for the energy plan for the development.

Please do not hesitate to contact me should you require any additional input.

Yours sincerely,



Paul Lewin  
Planning Policy & Projects Manager

Regeneration and Environment | London Borough of Brent  
7<sup>th</sup> Floor Brent Civic Centre | Engineers Way | Wembley | HA9 0FJ

Tel: 020 8937 6710

[www.brent.gov.uk](http://www.brent.gov.uk)