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20th August 2018

Dear Ms Willcock,

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 existing 2 storey light-industrial building housing a silversmith and a small kiosk serving food and drink. The proposed development is for the erection of a residential building up to 28 storeys comprising up to 173 residential units.

Site: Land at Argenta House, Argenta Way, London, NW10 0AZ and surrounding land on Wembley Point site allocation south of Wembley Brook.

I write in connection to your screening request submitted on 9th August 2018. 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 Jordan Henderson, on telephone 020 7937 3819 or email jordan.henderson@brent.gov.uk.

Yours sincerely,

P. Lewin

Paul Lewin
Team Leader (Planning Policy)

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

Reference number – n/a

Description of proposed development – Demolition of existing 2 storey light-industrial building housing a silversmith and a small kiosk serving food and drink and erection of a residential building up to 28 storeys comprising up to 173 residential units, limited parking and general landscaping.

Site – Land at Argenta House, Argenta Way, London, NW10 0AZ

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

Ms Willcock, an Associate for Environmental Planning and Assessment Ltd. (EPAL), has requested a screening opinion from the London Borough of Brent (the Council) on 8th August 2018. 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 site is 0.15ha and currently comprises the 2 storey Argenta House which is in use as a silversmith and a small food and drinks kiosk. Located adjacent to the Stonebridge Park estate the site is to the west of the North Circular and immediately adjacent to Stonebridge Park underground and overground tube station to the south. The site is separated from the 21 storey Wembley Point building and its surrounding car park by Wembley Brook which is contained within a concrete channel with some adjacent poorly maintained incidental green infrastructure. It is accessible via Point Place and Argenta Way which respectively lead onto Harrow Road in the north and the North Circular to the east. The housing in the area is generally characterised by 2 storey inter-war properties arranged in a typical street pattern.

The Size and Design of the Proposed Development

The proposed development is for the demolition of the 2 storey Argenta House, currently being used as a silversmith and for a small food and drinks kiosk. This will be replaced with a building up to 28 storeys comprising up to 173 residential units, a small amount of on-site parking and general landscaping.

Information Provided in Support of the Request for a Screening Opinion

The request for a screening opinion has been submitted with an initial assessment of the site in relation to EIA matters as set out in regulations and supporting guidance. This information has been used to inform this EIA Screening Opinion.

Previous History

The site has no recent planning history of particular relevance to this screening assessment.

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:

18/0321 (St George Developments plc) - Former Northfield Industrial Estate & units 2-18 Beresford Avenue & Abbey Works Estate, Wycombe Road, Wembley, HA0 & Ace Corner & Capital House, North Circular Road, London, NW10 Hybrid planning application for the redevelopment of Northfield industrial estate: Outline planning permission for the demolition of existing buildings and structures on the site, all site preparation works and redevelopment to provide new buildings ranging from 35.75m AOD to 111.95m AOD in height, with a total floorspace (GEA) of up to 309,400 sq. m (excluding basement up to 42,000 sq. m GEA) to accommodate 2,900 homes (Use Class C3), business and storage and distribution (Use Classes B1a, B1c and B8), commercial (Use Classes A1, A2, A3, A4 and A5), community and leisure (Use Classes D1 and D2) including community centre and nursery, new basement level including energy centre, associated storage, cycle and vehicle parking, new vehicular accesses, associated highway works to Beresford Avenue, landscaping and creation of new public and private open space, ancillary facilitating works, various temporary meanwhile uses, interim works and infrastructure. Full planning permission for demolition of existing buildings and structures on the site, all site preparation works and the development of Phase 1 (Buildings A, B, C and D ranging from 1 to 14 storeys in height) to comprise 402 homes (Use Class C3); 910 sq. m (GEA) of business floorspace Use Class B1a); 1,290 sq. m (GEA) of commercial floorspace (Use Classes A1, A2, A3, A4 and A5); and 1,610 sq. m (GEA) of community and leisure floorspace (Use Classes D1 and D2), including a community centre and nursery; together with new basement level including energy centre, associated storage, cycle and vehicle parking, new vehicular accesses, associated highway works to Beresford Avenue, landscaping and creation of new public and private open space, ancillary facilitating works, various temporary meanwhile uses, interim works and infrastructure. (Minded to Approve by Planning Committee 18th July 2018 subject to the signing of a S106 obligation)

16/4478 (Inland Homes) - Demolition of existing buildings at Abbey Wharf, Delta Centre and all of 152 Mount Pleasant and redevelopment to provide a residential-led, mixed-use development of up to 6 storeys comprising 135 residential units (34 x 1bed, 79 x 2bed and 22 x 3bed) and 247sqm of commercial space (A1, A2, A3, B1, D1 and D2), landscaped amenity space, car and cycle parking and associated works. (Approved 18 December 2017).

17/3244 (Bravo Wembley Limited) Wembley Point, 1 Harrow Road, Wembley, HA9 6DE Installation of new modernised facade to the three elevations of the building with associated external alterations. This is in association with numerous prior approvals for the conversion of the existing office block into residential totalling 440 studio apartments. Decision: Approved.

London Borough of Ealing
17/2220/FUL Twyford Abbey Twyford Abbey Road Park Royal London NW10 7DP Redevelopment of the site for use as a secondary and sixth form school (D1 Use Class) involving the construction of two part three-storey, part four storey buildings; construction of a single storey building within the walled garden; construction of a single storey building with swimming pool; construction of two gatehouses to provide ancillary offices and accommodation; exterior works to Twyford Abbey including demolition of later additions; and associated tree works, boundary treatments, hard and soft landscaping including the provision of a multi-use games area; and access and parking provision. Granted with conditions 17 Nov 2017

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 (2105). 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

It is noted that the Council is currently consulting on their new Local Plan. This round of consultation (known as the regulation 18 stage) represents the early stages of comment on the content of the plan and how it has been prepared. The Council intend to submit the Plan to the Secretary of State for examination in 2019. 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) will accompany 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 dwellinghouse 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 up to 173 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 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 (NO2) and the 24 hour mean national objective for particulate matter (PM10).

Documentation Accompanying the Planning Application: An Air Quality Assessment will be submitted with the application.

Construction
Machinery used during demolition/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 demolition/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. Taking account of these practices the effect of dust soiling and PM10 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.

Operation
Air quality emissions during operation will be from new traffic generation and heating systems. Consideration also needs to be given to the potential effects on the new internal receptors given the site's location within an AQMA and its proximity to both the North Circular and Harrow Roads, both of which are heavily trafficked. The Council is likely to seek technical reports that show how an air quality neutral development can be achieved.

The supporting statement confirms that limited parking will be provided on site due to the high PTAL rating of 4. This reflects the site's relatively accessible location in terms of travel by foot, cycle and public transport. Parking controls are likely to be increased in the surrounding area to deal with potential displacement off-site. This, along with measures to support walking, cycling and public transport is likely to reduce private car use. Taking this into account the level of net traffic generation resulting from this development is likely to be

negligible. As such emissions from vehicle movements will be minimal, and therefore effects are not considered to be significant.

It is not clear how the development will be heated, it is assumed that this will be by gas powered boilers. Any such system is likely to adequately disperse fumes through a suitably designed flue system and therefore the impact on local air quality will be negligible. As such significant effects are not considered to be likely. Such uses would be subject to environmental health legislation.

Mitigation

The Council is likely to seek an air quality neutral development. During the construction phase a Construction Environmental Management Plan (CEMP) should be implemented which implements suitable measures to reduce the impact of dust and emissions. This can be secured via a 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 is to be secured through a planning condition to ensure that new internal receptors are adequately protected.

In addition suitable conditions associated with the Travel Assessment including Travel Plan and measures to reduce reliance on the private car, for example through provision of sufficient cycle parking and potential S106 contributions to implementing a wider controlled parking zone will ensure reductions in impact through vehicle movements.

Local Heritage

Documentation Accompanying the Planning Application: A design and access statement will identify the extent of local heritage and cultural assets and how the design of the development has responded to these. In addition a views assessment will identify the extent to which the development impacts on skyline and protected views.

The Site does not lie within a Conservation Area or an Archaeological Priority Area. The closest heritage asset to the site is the grade II listed Robert Stephenson Railway Bridge which crosses the North Circular road 266 metres to the south of the site.

The site can be considered to have a generally low archaeological potential for all past periods of human activity. Past post depositional impacts are considered severe as a result of previous development, including excavation of the river channel and its realignment. On the basis of the available information no further archaeological mitigation measures are recommended in this particular instance.

The impact of the scale, height and form of the proposed buildings through the design and access statement/heritage assessment and views assessment will allow sufficient clarity of impact on the setting of features of historic or cultural importance.

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 EIA is not required in respect of heritage and cultural impacts.

Climatic Factors

Documentation Accompanying the Planning Application: An Energy Report will be submitted with the planning application.

Construction
Emissions from construction traffic and plant can contribute towards the region's greenhouse gas emissions. 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.

Operation
It is considered that the proposed development will be able to achieve the necessary carbon reduction targets, through actual reductions combined with financial contributions. 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 Phase 1 ground conditions survey should be submitted with the application. This will 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.

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 if necessary 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 an EIA.

Daylight, Sunlight and Overshadowing

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

Documentation Accompanying the Planning Application: A Daylight/ Sunlight Assessment will be submitted with the application.

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 a building up to 28 storeys 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. 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.

With respect to onsite receptors the building will sit within an urban context where taller buildings are prevalent and in close proximity which could impact on sunlight and daylight available to the development. Whilst this might impact on some receptors significant effects are not considered to be likely.

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

The heights and massing of the development can be amended to reduce the potential for adverse impacts on neighbours and occupants within the development.

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: A Riparian Habitat assessment will be submitted with this application.

The site contains no areas of statutory nature conservation and there are no such site within the immediate vicinity of the Site. There are two SSSI within 5km of the Site, namely Brent Reservoir SSSI which is nearly 5km away and Hampstead Heath Woods 3.8km away. There are no SPA, SAC, or Ramsar designations within 5km of the Site. The nearest Local Nature Reserves are Fox wood (2.5km), Wormwood Scrubs Park (3.2km), Perivale Wood (3.6km) and Grove Farm (4.6km). The closest Special Area of Conservation (SAC) is Richmond Park, located almost 10km south of the site. The closest National Nature

Reserve is also Richmond Park, followed closely by Ruislip Woods which is located 11.4km north-west of the site. The nearest AONB is the Chilterns AONB, located 21km north-west of the site. The South West London Waterbodies is the closest Ramsar Site and SPA to the site, located 18km south-west.

The development site is bordered by Wembley Brook which flows from the west under Point Place into a concrete channel. Wembley Brook is part of a Grade I SINC that stretches from Harlesden to Wembley Central and includes railway trackside vegetation. The section of the Brook on site is not part of the SINC, however, due to close proximity to the SINC and the railway Wildlife Corridor, consideration should be taken. A Riparian Habitat Assessment should be taken to assess the potential of the watercourse, with an aim to enhance this section to benefit habitat connectivity with local ecology.

Construction
Depending on the findings of the Riparian Habitat assessment a range of standard mitigation measures may be required to reduce potential adverse impacts on biodiversity.

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. inclusion of habitats for fauna, green roofs/ walls and a wider range of green infrastructure on site that encourages bio-diversity. Efforts should focus on the enhancement of the riparian habitat with an aim to provide habitat connectivity with nearby conservation areas. Whilst this is considered to be beneficial, this is not considered to be significant.

Mitigation
If ecology is on-site, suitable conditions should be in place to ensure potential adverse impacts on retained features are minimised during prior to and during works on site, as well as incorporation of suitable features to encourage bio-diversity resources as part of the development.

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 (FRA) addressing surface water and fluvial matters will need to be submitted. The site is located within Flood Zone 3a (surface water), Flood Zone 3a (fluvial and tidal) and Flood Zone 3b (fluvial and tidal).

Construction
As part of the construction process, it is likely that there will be significant changes to the existing channel to deal with the existing failing channel walls, provision of footings/ foundation works for the building, maximising storage capacity/ flows and softening/ naturalising the channel to improve its ecology, as part of the site is functional floodplain there are potential concerns over health and safety during construction. A Flood Risk Assessment will need to be submitted which addresses this concern and how risk both on and off-site to people and property will be reduced to acceptable levels, particularly during flood events.

Operation
The FRA will seek to ensure that the proposed development will not increase flood risk to occupants and off-site. This will include ensuring as little of the building footprint is located in Flood zone 3 as possible, and if it is putting less vulnerable uses in areas at higher risk

and ensuring that the impacts on flood storage/ floodplain capacity are not adversely affected. In addition it is likely that the site will reduce surface water run-off to greenfield rates through a series of measures such as green roofs/ on site storage. The development will also need to be subject to acceptable warnings and potential evacuation procedures/ safe routes to ensure that occupiers, visitors and the emergency services are not put at unacceptable risk during periods of flooding.

Mitigation
The development will be located and designed so not to increase risk of fluvial and surface water flooding. Implementation and management of surface water run-off should be secured though a planning condition. The warning and evacuation procedures will need to be in place prior to occupation and maintained to a sufficient quality throughout the lifetime of the development, either through condition or if necessary through S106 obligation.

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

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, flood risk or air quality) 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 residential accommodation. 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 will be submitted with this application. Background noise levels on the site, and in this part of the Borough, are principally characterised by road traffic noise and railway noise.

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

There are likely to be deliveries to residents as well as waste removal, but in an urban context the impacts will be limited. As such, there is not considered to be any significant effects from traffic noise.

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. The Noise Assessment will consider how 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.

No significant effects are therefore anticipated.

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 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. This might be through specifications on glazing, acoustic trickle vents, air bricks or mechanical ventilators, in order to reduce noise ingress but provide adequate ventilation to the standards.

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: The planning statement might give an indication of current land use and number of jobs within the site and compare this with what is proposed.

Construction

The proposed development would create benefits to local employment though providing temporary employment during construction. This is considered to be beneficial, but not significant.

Operation

In addition approximately 1 in 12 people work from home, so the development will provide space for occupants to do this. The development will provide a large number of new additional homes.

The development will increase demand for local social infrastructure. 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 through CIL will be sought to mitigate the effects of increased population/ users.

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 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

There is a Telecommunication mast to the immediate north east of the site.

The height of the taller buildings may impact on the quality of television reception in the near locality, but on the basis of information provided with other sites in the vicinity the impact is not to be significant.

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 townscape analysis will identify the extent to which the development impacts on the skyline.

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 up to 28 storeys and therefore represents a significant increase in scale over existing on site uses. It is estimated that the building will be in the region of 92 metres in height. The context within which it sits however currently includes tall buildings in the near vicinity. To the north is the 21 storey Wembley Point building (79.9 metres in height) which currently has prior approval for conversion into residential so therefore is set to remain present. This building due to its uniform shape and

façade treatment has considerable bulk whichever angle it is viewed from and is inconsistent with the surrounding character of the immediate area. To the east is the Ex Unisys and Sperry Univac buildings, both of which are 7 storeys. To the south is the Northfields site which is set to see redevelopment, with the inclusion of some multi-storey residential blocks one of which is up to 26 storeys. The EIA submitted with the Northfields development concluded that the visual impact of that development would not be significant. Taking account of assessments of other sites in the vicinity and given that the townscape has already been significantly impacted upon by the Wembley Point building, the Council considers that although the proposed development might have the potential for some adverse effects on townscape and views, given the scale of the development and the urban nature of its location, significant effects are not considered likely.

Mitigation
During construction, ensure the erection and maintenance of hoarding. For the operational phase suitable 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 Assessment will be submitted with the planning application. The site is located within an area with a public transport accessibility level (PTAL) of 4. As such it has good public transport accessibility (Stonebridge Park station and numerous bus services located immediately adjacent to the building) and is in an area where the Council will seek to limit on site car parking provision.

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. 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 Transport Assessment will set out how the site would be serviced when operational, which is consistent with an approach agreed with the local highway authority. Due to the proposed limited on site car parking provision operational traffic effects of the proposals are likely to be negligible when placed within the context of the site's existing use and adjacent traffic levels. Increased numbers of movements related to deliveries could generate additional traffic over current levels. However, given the scale of the development, these effects are not considered to be significant. The lack of on-site car parking and residents' controlled parking zone in the area will mean that suitable controls on residents potential to own/park cars on site and in the vicinity will be expected, this is likely to include restrictions within property leases as well as potential financial payments towards local transport infrastructure, which will help to mitigate any adverse effects.

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

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: A CEMP will be sought as part of the planning process to deal with demolition and construction waste matters. A Site Waste Management Plan will also be submitted with the Planning Application.

Construction
The site will generate waste, principally building materials during the demolition and construction stages. 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 inclusion of suitable waste facilities for residents is covered under part H6 of the Building Regulations, and to ensure this, inclusion of separate facilities for general waste, recycling and organic materials is normally assessed for capacity and suitability as part of the normal planning process with reference to the 2015 Brent Council guidance.

The decision notice should include suitable conditions to ensure that waste facilities for residents are provided prior to occupation. No significant effects are anticipated.

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 sufficient space and practises to ensure adequate measures for waste management are in place prior to and during occupation.

Water Quality (hydromorphological changes, quantity and quality)

Documentation Accompanying the Planning Application: This matter will be addressed in a number of areas, Flood Risk Assessment/ drainage strategy, ground conditions survey and the CEMP that will be required as part of the application/ permission process.

The site includes part of Wembley Brook and would allow run-off from informal pathways from flows off-site, water would access these through the surface water drainage network.

Construction
During the construction process, particularly as it is likely significant changes will be sought to the existing river channel there is the potential to affect water quality through accidental pollution events, such as fuel spills and increased sediment related to disturbance of the existing channel, plus within surface water on the remainder of the site passing through to the adjacent watercourse. 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, for example through piled foundations. This will require measures to avoid such potential. With the implementation of an agreed construction method for the channel works and elsewhere 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. 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 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 Contaminated Land Report 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 works within the drainage channel will require an agreed construction methodology, probably with the Environment Agency via condition, so that adverse impacts particularly through potential for increased silt/ solids in the watercourse as not so great to cause significant adverse impact. The implementation and management of SuDS and associated pollution control mechanisms for surface drainage should be secured though 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 Impact Assessment should be submitted with the application.

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 a new building onto the site that will be up to 28 storeys in height. Therefore there may be adverse effects on the existing wind conditions. This can be assessed throughout the normal planning process taking account of the Wind Impact Assessment. Mitigation measures should 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 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 needs to be considered when determining if the effects would be so significant as to warrant EIA.

The Council has considered a wide area consisting development sites adjacent or within the vicinity as set out above. The closest such scheme is for the potential redevelopment of the Wembley Point site, whilst the largest was the Northfields site which was subject to Environment 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

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.

It is anticipated that CIL and S106 will address capacity issues that might exist in relation to on and off-site infrastructure. However, in in relation to healthcare provision, the Northfields EIA identifies moderate adverse cumulative effect is anticipated in relation to the demand on primary healthcare facilities. Taking into account the high numbers of residential units proposed arising from the Proposed Development and the committed developments, current provision will potentially be inadequate to meet additional demand. The committed developments may then, if not proposing on or off-site healthcare provision, have to mitigate any shortfall through S106 agreements and CIL contributions.