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Emma Woods
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By email

16 September 2019
Our Ref: 19/0196/PRE

Dear Ms Woods,

Re: Land Surrounding Northwick Park Hospital: EIA Scoping Opinion.

Thank you for your e-mail on the 14th August 2019 requesting the Council's scoping opinion on the Environmental Statement which you intend to submit in association with a planning application for the redevelopment of the Land Surrounding Northwick Park Hospital site. To assist, you submitted a detailed EIA Scoping Report August 2019 prepared by Trium. The Council consulted Statutory Consultees as identified in the EIA Regulations 2018 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. Consultation responses are appended. The planning related issues raised should be considered in relation to both the technical reports required in association with the application, and the proposed scope as set out in the EIA Scoping Report August 2019 prepared by Trium, such that it needs to be revised.

Council's Scoping Opinion:

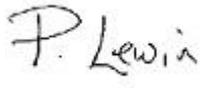
The Council considers that the EIA Scoping Report August 2019 by Trium for the Land Surrounding Northwick Park Hospital development to be a comprehensive document which is consistent with the requirements of the regulations and associated guidance. It considers that the scope of the Environmental Assessment should be as set out in that report, in addition to that proposed within the consultation responses appended. It is agreed that for the purposes of the Assessment that it should focus on: Air Quality; Climate Change; Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare; Health; Noise and Vibration; Socio-Economics; Townscape and Visual Impact Assessment; Traffic and Transport; and Wind Microclimate. Following representation from Historic England and Natural England it is also considered that Built Heritage and Ecology and Biodiversity should also be included.

Other impacts are not considered to be of such likely significance that they warrant inclusion within the scope.

A summary of consultee responses can be found in Appendix A of this document.

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

Yours sincerely

A handwritten signature in black ink that reads "P. Lewin". The signature is written in a cursive style with a large, looped 'P' and a clear 'Lewin'.

Paul Lewin
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APPENDIX A

Summary of consultee responses:

Air Quality (Environmental Services) –

The current proposed air quality assessment includes consideration of the potential effects associated with the construction and operation phases and an air quality neutral assessment of the proposed development. With respect to the proposals, we have the following comments to make:

- It is recommended that due to the large scale of the proposed development that onsite diffusion monitoring is undertaken for baseline requirements over a period of (3-6 months). Passive or active NOx monitoring at the site will enable a better understanding of air quality at the site.
- NOx levels should also be measured during the operational site phase.
- The Air quality impact assessment should also include hospital related emissions particularly during the operational phase of the development.
- Borderline emission pollution impacts and their cumulative effects should be considered.
- A detailed assessment of railway emission has been scoped out the proposed air quality assessment however impact from the use of diesel freight trains in use should be considered in the assessment.
- During construction a construction dust monitoring alarm system should be put in place to manage dust emissions.

Environment Agency –

No comments to make on the EIA scoping opinion request and consider the environmental risk associated with the proposal to be low. Agree that Water Resources, Drainage and Flood Risk, Ecology and Biodiversity and Geo-environmental (Ground Conditions, Groundwater) should be scoped out. However, while these aspects are not considered significant in terms of the EIA and do not need to be addressed as specific topics in the Environmental Statement, they should still be addressed through normal planning application requirements.

Historic England –

Consider that Built Heritage should be scoped into the EIA. The development could potentially have an impact on a number of designated heritage assets and their settings in the area around the site, and would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposal might have on those elements which contribute to the significance of these assets. Would also expect the Environmental Statement to consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest.

Given the heights of the structures associated with the proposed development and the surrounding landscape character, this development is likely to be visible across a very large area and could, as a result, affect the significance of heritage assets at some distance from the site. They therefore expect the assessment to demonstrate the extent of the proposed study area is of an appropriate size to ensure that all heritage assets likely to be affected have been included and can be properly assessed. Assessment should be designed to

ensure all impacts are fully understood (section drawings and techniques such as photomontages are useful).

Assessments should also take into account the potential impact which associated activities (e.g. construction, servicing / maintenance, associated traffic) might have upon perceptions, understanding and appreciation of heritage assets in the area, and where appropriate, the likelihood of alterations to drainage patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.

Emphasise that further consultation, directly with the London Borough of Brent's Conservation Officer and GLAAS, be made.

Land Contamination (Environmental Services) –

Have reviewed the Geotechnical and Geo-Environmental desk study report, which provides a satisfactory assessment of the site and recommends that further intrusive site investigation is required.

Natural England –

Case law and guidance stresses the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission.

- A thorough assessment of 'in combination' effects of the proposal with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES with all supporting infrastructure to be included within the assessment.
- Ecological Aspects: Potential impact upon features of nature conservation interest and opportunities for habitat enhancement / creation should be included within the assessment in accordance with appropriate guidelines.
- Internationally and Nationally Designated Sites: The ES should assess potential for the proposal to affect designated sites. Should a Likely Significant Effect on a European / Internationally designated site be identified or be uncertain, the LPA may need to prepare an Appropriate Assessment.
- Regionally and Locally Important Sites: The EIA will need to consider any impacts upon local wildlife and geological sites. The ES should include an assessment of likely impacts on the wildlife and geodiversity of such sites, and the assessment should include proposals for mitigation and if appropriate, compensation.
- Protected Species: The ES should assess the impact of all phases of the proposal on protected species. Consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area.
- Habitats and Species of Principal Importance: The ES should thoroughly assess the impact of the proposals on habitats and / or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List. Advises that a habitat survey (equivalent to Phase 2) is carried out on the site.
- Designated Landscapes and Landscape Character: Wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies pertaining to the area. EIA should include assessments of visual effects on the surrounding area and landscape

together with any physical effects such as changes in topography. The EIA should include a full assessment of potential impacts on local landscape character using landscape assessment methodologies. The EIA process should detail the measures to be taken to ensure building design will be of a high standard, and assessment should include the cumulative effect with other relevant existing or proposed developments in the area. NE advises that the cumulative impact assessment should include other proposals currently at Scoping stage. The assessment should refer to relevant National Character Areas and should consider whether there is land affected by the proposal which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific or historic interest.

- Access and Recreation: Encourage any proposal to incorporate measures to encourage people to access the countryside for quiet enjoyment.
- Rights of Way, Access Land: EIA should consider potential impacts on access land, public open land, rights of way and coastal access routes in the vicinity of the development.
- Air Quality: Assessment should take into account risks of air pollution and how these can be managed or reduced.
- Climate Change Adaptation: ES should reflect the principles of the England Biodiversity Strategy and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. ES should also demonstrate how the proposal can contribute to the enhancement of the natural environment by establishing coherent ecological networks that are more resilient to current and future pressures.
- Contribution to local environmental initiatives and priorities: recommend looking into how this proposal fits in with local initiatives and priorities relating to the delivery of GI, biodiversity opportunity areas and biodiversity enhancements.
- Cumulative and in-combination effects: A full consideration of the implications of the whole scheme should be included in the ES, including an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out.

Nuisance (Environmental Services) –

Note that noise and vibration testing is proposed and have no concerns to raise at this stage. In the event that the full application(s) are submitted, will consider the proposal(s) in terms of internal noise (and vibration) criteria; plant noise; commercial noise; community facilities; retail and leisure facilities and community centre.

Thames Water –

Consider that the following issues should be considered and covered in either the EIA or planning application submission: 1) the development's demand for Sewage Treatment and network infrastructure both on and off site and can it be met; 2) the surface water draining requirements and flood risk of the development both on and off site and can it be met; 3) build-out / phasing details to ensure infrastructure can be delivered ahead of occupation; 4) any piling methodology and will it adversely affect neighbouring utility services.