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8<sup>th</sup> October 2019

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Dear Sir/Madam,

**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 the proposed demolition of the existing buildings and the redevelopment of the site to provide six buildings ranging between four to twelve storeys and eight three storey mews houses, and the erection of a two storey commercial building, providing a total 4,051m of flexible commercial floorspace (B1(a), (b) and (c), B8, D2 and A3) across the site and 502 residential units including a mix of studio, 1, 2, 3 and 4 bedroom units with associated basement car parking, cycle storage, plant and shared external amenity space and landscaped courtyards at ground floor level, and other ancillary works.

**Site:** Land at 1-8 Capitol Way and adjoining land, Colindale, NW9 0HN

I write in connection to your screening request submitted on 17<sup>th</sup> September 2019. 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](mailto:paul.lewin@brent.gov.uk).

Yours sincerely,

A handwritten signature in black ink that reads "P. Lewin".

**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 Environmental Impact Assessment is required for the proposed demolition of the existing buildings and the redevelopment of the site to provide six buildings ranging between four to twelve storeys and eight three storey mews houses, and the erection of a two storey commercial building, providing a total 4,051m<sup>2</sup> of flexible commercial floorspace (B1(a), (b) and (c), B8, D2 and A3) across the site and 502 residential units including a mix of studio, 1, 2, 3 and 4 bedroom units with associated basement car parking, cycle storage, plant and shared external amenity space and landscaped courtyards at ground floor level, and other ancillary works

**Site** – Land at 1-8 Capitol Way and adjoining land, Colindale, NW9 0HN.

*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**

Rolfe Judd Planning, on behalf of Neat Developments and Royal London Asset Management, have requested a screening opinion from the London Borough of Brent (the Council) on 17<sup>th</sup> September 2019. Associated with this request details of the site boundary, proposed development, a context map and an initial assessment of the potential impacts of the proposed development were referred to.

**The Existing Site and Surrounding Area**

The site consists of two plots (referred to as 'Plot 1' and 'Plot 2'). These are separated by Capitol Way, and have a combined area of approximately 1.74 ha.

Plot 1 (approximately 1.562ha) adjoins Capitol Way to the south and Stag Lane to the west. To the north are commercial units along Carlisle Road, and to the east is a residential-led mixed-use development and trade / retail units. Plot 1 is occupied by a vacant warehouse and office building. These buildings have been vacant for more than 5 years. Within the site to the east and south is concrete hardstanding (but outside the warehouse). The area to the west fronting Stag Lane is largely grassed, but also contains a small open electricity substation to the north-west corner. The topography of Plot 1 is relatively flat, varying from 49.35m to 50.19m above ordnance datum. There is existing vehicular access to Plot 1 from Capitol Way on the southern boundary of the site.

Plot 2 (approximately 0.1783ha) is bordered by Capitol Way to the north, Stag Lane to the west and the south and east by a VW/Skoda sales and service centre. Plot 2 is currently occupied by an area of hardstanding and some unmanaged scrubland between the existing commercial property's perimeter fence and Stag Lane's east pavement. There are several trees situated within this area of scrubland on the west and northern boundary of Plot 2. These trees are under a tree preservation order (TPO) 16/001 which took effect provisionally from 1st February 2016. Existing vehicular access to Plot 2 is from Capitol Way on the northern boundary of the plot.

The site is designated as a Locally Significant Industrial Site (LSIS) in the Brent Local Plan. It constitutes part of the western section of the site allocation BNSA1 (Capitol Way Valley) as outlined in the draft Local Plan preferred options document issued for consultation in November 2018, and proposed for Regulation 19 in autumn / winter 2019. BNSA1 is allocated for mixed-use development comprising areas of employment intensification and co-location with other uses, retention of superstore of same size or less, residential development and any associated required social infrastructure. According to current policy, the site is located just outside of the Burnt Oak and Colindale Growth Area. However, the site falls within the proposed amended growth area boundary for Burnt Oak and Colindale in the draft Local Plan. The site is also located within a proposed Tall Building Zone in the draft Brent Local Plan.

The site is located approximately 240m from Brent's border with the London Borough of Barnet, to the north-east.

The Site is approximately 240m west of the A5 Edgware Road highway at its nearest point, 500m west of Silk Stream, 634m north-east of Roe Green Park, 846m south of Burnt Oak London Underground Limited (LUL) station, 1.04km west of Colindale LUL station, 1.23km east of Queensbury LUL station, 1.27km north-east of Kingsbury LUL and the M1 motorway is 2km east of the Site. The site has a PTAL rating of 2/3 (poor/moderate).

Land uses surrounding the site include residential, commercial and quasi industrial uses. There is extensive area of low rise inter war housing to the west fronting onto Stag Lane, as well as the large residential-led mixed use development known as TNQ to the south-east of the Site. The TNQ development comprises 460 residential units and circa 6,000sqm of ground floor retail space.

Four residential properties are also located immediately adjacent to Plot 1's north-west boundary on the corner of Stag Lane and Carlisle Road. A variety of commercial uses also lie in close proximity to the north, east and south, and primarily these are either trade retail use or B1 (a) (b) and (c) uses. Within the Capitol Way area are also four large supermarkets and associated car parking are located 150m east of the Site. Stag Lane Medical Centre (NHS General Practice) and a place for Sikh worship is located 90m south-east of the Site. Several schools and education centres are in the surrounding area, include: The Village School (270m south of the Site;); Roe Green Infant and Junior School (500m to the south-west); Kingsbury High School (520m to the south-west); and Beis Yaakov Primary School (555m south-east).

The site is not located within an archaeological priority area (APA), is not within a conservation area, nor directly adjacent to a conservation area. The nearest conservation area is Roe Green about 200 metres away. There are no scheduled ancient monuments or listed buildings on the site.

There are a number of SINC's (Sites of Importance for Nature Conservation) within 500m of the site. These include the LBB Grade II area surrounding one of the Silk Stream's channels, 85m to the south east; LBB Grade II area bordering Westfields College's athletics grounds, 185m to the south east; and London Borough of Barnet's designated Silk Stream (grade unknown), 385km east of the site. The Silk Stream is a locally designated Site of Borough Importance for Nature Conservation within the London Borough of Barnet (as defined by the London Borough of Barnet's Core Strategy, 2012). Three London Borough of Brent parks are situated near the site: Eton Grove (510m west) and Grove Park (185m south-east) and Roe Green Park, is 575m south-west of the site. Two local parks within the London Borough of Barnet are located near the site: Montrose Playing Field (400m east) and Silkstream Park (470m north-east).

The site is located within Flood Zone 1, with a less than 1 in 1000 annual probability of river flooding (<0.1%). However, the site is located within a Critical Drainage Area (CDA). The Drain London mapping identifies several areas of significant risk within this CDA. The main flood risk relates to surface water ponding on Stag Lane and Roe Green.

The site is not located within an AQMA, but is situated adjacent to it at its north eastern boundary.

### **The Size and Design of the Proposed Development**

The proposed development would be a full application for the two sites. It would comprise the demolition of all the existing buildings on the site, and erection of six buildings, ranging between 4-12 storeys, and eight 3-storey mews houses. The proposal would consist of 502 residential units, associated basement parking, cycle storage, plant and shared amenity space, landscaped courtyards and other ancillary works. It would also comprise the erection of a two storey commercial building providing 4,051sqm of flexible commercial workspace.

The proposed development seeks to increase the heights on the consented blocks granted under permission 17/0837 on the 12<sup>th</sup> November 2018, in addition to optimisation of internal layouts to increase the provision of residential units.

### **Information Provided in Support of the Request for a Screening Opinion**

The request for screening opinion has been submitted with a supporting statement setting out an analysis of the likely environment effects of the proposal, in addition to a Context Map and Existing Site Location Plan. Further information has since been submitted consisting of an updated Context Map, a List of Pending and Determined Major Planning Applications in Radius of Site, and a PPG EIA Screening Checklist. This information has been utilised, as necessary, to inform this EIA Screening Opinion.

### **Previous History**

Planning permission granted on 12/11/2018 (reference 17/0837) for the following:

*Demolition of the existing buildings and the redevelopment of the site to provide six buildings ranging between four to nine storeys and eight three storey mews houses, and the erection of a two storey commercial building, providing a total 4,051m of flexible commercial floorspace (B1(a),(b) and (c), B8, D2 and A3) across the site and 414 residential units including a mix of studio, 1, 2 and 3 bedroom units with associated basement car parking, cycle storage, plant and shared external amenity space and landscaped courtyards at ground floor level, and other ancillary works.*

The application above was also subject to an EIA screening by the LPA (13<sup>th</sup> June 2016) and was not considered to require an EIA.

There are no other relevant planning applications relating to the redevelopment of the site.

## Large Scale Development within the Vicinity

### Determined Major Planning Applications

Note: list includes application above (on the same site)\*

Capitol Way (TNQ)	16/0304 (Granted 09/03/2017)  <b>Under Construction</b>	Erection of replacement 4-storey and 6-storey blocks above two-storey podium decks and a frontage block of 17 storeys above the podium, comprising 460 self-contained flats, 5,360m <sup>2</sup> of retail (Use Class A1 bulky goods), a 734m <sup>2</sup> garden centre, 1922m <sup>2</sup> of floorspace for alternative uses falling within Use Classes A uses (A1, A3) or B1 (a-c), and 649m <sup>2</sup> for alternative uses falling within Use Classes A uses (A1, A3), Class B1 or Class D1 (community/health centre), 97m <sup>2</sup> of crèche facilities (Use Class D1), 281 residential car-parking spaces, 500 residential cycle-parking spaces, 172 commercial car-parking and 80 commercial cycle-parking spaces, 527m <sup>2</sup> energy centre, bin stores and associated landscaping, with access from Capitol Way NW9 and Plaza Walk NW9
Oriental Way	12/2166 (Granted 27/06/2013)  <b>Under Construction</b>	Erection of a 7,817sqm gross external area (GEA) Class A1 retail food store with associated service and delivery yard; 5,207sqm GEA of new Oriental and Far Eastern Floorspace to include shops, financial and professional services, restaurants and cafes, drinking establishments, hot food takeaways and non-residential institutions (Class A1, A2, A3, A4, A5, B1 and D1); 183 residential units), associated car parking spaces and cycle parking spaces, associated landscaping and new vehicular access from Airco Close (Phase 2, all matters reserved) and two form of entry primary school and nursery (Class D1, Phase 3, all matters reserved).  <b>Environmental Statement not required</b>
Silver Works/ Sarena House	14/2930 (Granted 30/01/2015)  <b>Completed</b>	Demolition of all existing buildings and the erection of 2 to 6-storey buildings providing 227 residential units (10 x 4bed houses, 58 x 1bed, 101 x 2bed, 31 x 3bed and 27 x studio flats), 256 sqm of affordable workspace for research and development (Use class B1(B))  <b>Environmental Statement not required</b>
Colindale Hospital (London Borough of Barnet)	H/00342/09 (Granted 20/11/2009)	Redevelopment of the former Colindale Hospital to include the erection of 714 residential units including the change of use and conversion of the listed former Administration building to residential, a new primary care trust facility (Use Class D1) of 1,132sqm, commercial units (Use Class A1/A2//A3/B1) and site management office (Use Class D1/B1), together with access roads, car parking and cycle parking, new public and private open space, children's play space and landscaping. Application includes the submission of an Environmental Statement.

		<b>Environmental Statement Submitted</b>
Former College Plot Within The Former Colindale Hospital Site  (London Borough of Barnet)	H/00093/13 (Granted 04/12/2013)	Full planning application for the erection of two buildings ranging from five to nine storeys in height comprising 242sqm of commercial floorspace (Classes A1, A2, A3, B1 and/or D1) on part ground floor and 157 residential flats (Class C3) on part ground and upper floors, together with associated access, car parking and landscaping.  <b>Environmental Statement not required</b>
Edition/British Library Newspapers  (London Borough of Barnet)	H/05856/13 (Granted 23/12/2014)	Demolition of all existing buildings; redevelopment to provide 395 flats, 772sqm of retail/financial/professional/restaurant/café uses (Use Classes A1/A2/A3) and 112sqm of floorspace for retail/financial/professional/restaurant/café uses (Use Classes A1/A2/A3) or community use (Use Class D1) in six blocks ranging from 4 to 11 storeys; associated highways and public realm works including formation of piazza adjacent to Colindale Avenue and Colindale Park; associated access from Colindale Avenue, internal street network, car and cycle parking, refuse storage, landscaping and amenity space provision; associated plant and relocation of existing substation  <b>Environmental Statement not required</b>
126 Colindale Avenue  (London Borough of Barnet)	18/5153/S73 (Granted 23/08/2019)	Demolition of existing business centre and construction of 2 no. two five storey buildings to provide 35 no. residential flats and 566 m2 of commercial floor space (Use Class B1), including basement car park with 44 car spaces and 70 cycle spaces. Provision of associated access, refuse storage, amenity space and landscaping.
120 Colindale Avenue  (London Borough of Barnet)	H/02576/09 (Granted 26/08/2010)	Redevelopment of the site comprising the provision of 104 residential units and 3 commercial units (Use Class A2/B1/D1) within three blocks of part 3, part 4 storeys, together with associated site accesses, car parking, open space and landscaping.
3 Burnt Oak Broadway	11/0403 (Granted 03/06/2011)  <b>Under Construction</b>	Demolition of existing building and erection of a seven-storey mixed use building comprising 76 flats (23 x 1-bed, 38 x 2-bed, 11 x 3-bed and 4 x 4-bed units), 925m2 of commercial floorspace (Use Class A1 and A2), with 75 parking spaces, first floor rear communal roof terrace and associated

1-8 Capitol Way*	17/0837 (Granted 12/11/2018)  <b>Not Started</b>	Demolition of the existing buildings and the redevelopment of the site to provide six buildings ranging between four to nine storeys and eight three storey mews houses, and the erection of a two storey commercial building, providing a total 4,051m of flexible commercial floorspace (B1(a),(b) and (c), B8, D2 and A3) across the site and 414 residential units including a mix of studio, 1, 2 and 3 bedroom units with associated basement car parking, cycle storage, plant and shared external amenity space and landscaped courtyards at ground floor level
Former Register Office  (London Borough of Barnet)	17/6051/FUL (Granted 01/08/2019)	Demolition of former Barnet Register Office (Class D1) and garages and the erection of a four-storey building containing 30no affordable homes (Class C3). Associated landscaping and car parking
Stag House  (London Borough of Barnet)	17/8140/FUL (Granted 24/01/2019)	Demolition of the existing building. Erection of a four, five and six-storey building to facilitate 51 no (assisted living C2 use) self-contained units with associated communal facilities, landscaping, parking, buggy/cycle storage and refuse and recycling storage

#### Pending Major Planning Applications

Colindale Station  (London Borough of Barnet)	19/0859/OUT (Pending)	Hybrid planning application for comprehensive redevelopment of the site comprising full planning permission involving demolition of existing buildings to provide a replacement railway station ticket hall building (702 sq.m) with step free access (sui Generis) and including a retail store (Class A1) unit. Outline planning consent for the erection of a mixed use development ranging from 6 to 29 storeys in height comprising of up to 860 sq.m of flexible A1/A2/A3/A4/A5 and B1/D1/D2 uses and up to 313 residential units (Class C3) together with provision of ancillary refuse, cycling and disabled parking spaces and associated works.
Green Point, Edgware Road  (London Borough of Barnet)	19/0198/FUL (Pending)	Conversion of part of ground and creation of a mezzanine at first floor level to provide 10no self-contained residential units. Change of use from A1 retail to A1- A5 and B1. External alterations to front and rear elevations. Alterations to landscaping including new boundary planter
Imperial House	19/2897/FUL (Pending)	Redevelopment of the Site, comprising the demolition of existing buildings and the erection of buildings ranging from 3 to 16 storeys to provide 102 residential units (Use Class C3) and 499sqm of replacement commercial floorspace (Use Class A3/B1a/D1/D2), along with

(London Borough of Barnet)		associated soft and hard landscaping, ancillary refuse and recycling storage, car parking, wheelchair parking, cycle parking and servicing arrangements
Park Parade Mansion	17/2284 (Pending)	Demolition of existing buildings and redevelopment of the site to provide a replacement part 4 part 5 and part 18 storey building comprising 563m2 of retail uses (Class A1, A2 A3), and 110 residential units (56 x 1bed, 30 x 2bed and 24 x 3bed) with associated car parking, cycle storage, plant and shared external amenity space at first and fifth floor level with other ancillary works.

### 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

It is noted that the Council is in the process of producing a new Local Plan. Regulation 18 took place between November 2018 – January 2019, and the council intends to publish the draft plan for the next stage of consultation (Regulation 19) in October 2019. Following this, it is intended to submit the Plan to the Secretary of State for examination in 2020. 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.

#### Masterplans

The subject site is not located within any Masterplan areas.



## 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 approximately 502 residential units and a total of 4,051sqm of flexible commercial floorspace. The proposal therefore exceeds the threshold for item 10(b). 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 not located within the Brent Air Quality Management Area (AQMA), but is located near to the AQMA along Edgware Road, particularly to the north east. 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 (NO<sub>2</sub>) and the 24 hour mean national objective for particulate matter (PM<sub>10</sub>).

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: *An air quality assessment will be submitted in support of the planning application to determine the likely effects and determine whether further site specific measures are required for the operation of the proposed development.*

### 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. During the demolition and construction phase, appropriate standard best practice site controls will be adhered to such as covering vehicles entering the site, site hoarding, and dust monitoring. 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, heating systems and potentially operation of the businesses related to the commercial floorspace proposed. 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 relatively heavy trafficked road. The Council is likely to seek technical reports that show how at the least an air quality neutral development can be achieved.

As the site is primarily within a PTAL 2/3 area, which is poor / moderate. The previously approved scheme proposed 254 car parking spaces, and the amended scheme proposes

113 parking spaces. It is not clear how many spaces will be allocated to the residential units and how many will be allocated to the commercial units. The previous scheme was not considered to have a significant effect upon traffic generation in the area which would require an EIA related to this issue. Taking into account the level of net traffic generation resulting from this development in the context of existing traffic emissions and the reduced amount of car parking spaces proposed, emissions from vehicle movements are not considered to be significant.

It is not clear how the development will be heated. If heated by gas powered boilers, such a system is likely to adequately disperse fumes through a suitably designed flue system and therefore the impact on local air quality will be negligible. Any building services plant / energy centre will be designed to minimise NOx emissions rates as recommended by the Mayor's Sustainable Design and Construction SPG. As such significant effects are not considered to be likely. Given the proximity of commercial to residential it is assumed that occupiers are unlikely to undertake activities that will generate potentially significant impacts on air quality. Such uses would be subject to environmental health legislation.

Consideration also needs to be given to the potential effects on the new internal receptors given the location for the proposed development adjacent to in part to a relatively heavily trafficked road and close to an AQMA.

### Mitigation

The Council is likely to seek at the least an air quality neutral development. During the construction phase a CEMP should be implemented which implements suitable measures to reduce the impact of dust and emissions. This can be secured via a planning condition.

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

In addition, although the new proposal proposes a reduced number of car parking spaces (from 254 on the approved scheme to 113 on the subject proposal) suitable conditions associated with the Travel Assessment and 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 Townscape, Views and Heritage Assessment will be included at planning application stage to support the application.*

The site is not located within a Conservation Area, nor is it directly adjacent to a Conservation Area. There are no Scheduled Ancient Monuments or Listed Buildings on the site. The site is not located within an Archaeological Priority Area.

The closest features are the Locally Listed Suite F Room 1 Symal House (approximately 210m from the site boundary), the Locally Listed Beis Yaakov Primary School (approximately 560m from the site), a Grade II listed Telephone Kiosk (approximately 460m

from the site) and the Grade II listed 1 Burnt Oak Broadway (approximately 270m from the site boundary). Roe Green Conservation Area is located approximately 200m to the south of the site, and Watling Conservation area approximately 330m to the north east in the London Borough of Barnet. Sites of Archaeological Importance are located approximately 310m to the north, 300m to the south east and 390m to the south. The closest Archaeological Priority area is over 2.5km to the south. An Area of Special Archaeological significance in the London Borough of Barnet is located approximately 870m to the north east.

The site has already been subject to significant urban development. An archaeological desk-top assessment will be completed, and if required, a watching brief / on site recording during the development's construction phase can be undertaken to ensure any historical / or archaeological artefacts will be recorded and protected. A Townscape, Views and Heritage Assessment is proposed to be provided at planning application stage.

On the basis of the available information no further archaeological mitigation measures are recommended in this particular instance.

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. The separation distance between the site and designated heritage assets means that significant impacts are not anticipated. However, a design and access statement should identify the extent of local heritage and cultural assets and how the design of the development has responded to these. Additionally, the Townscape, Views and Heritage Assessment should identify the extent to which the development impacts on the skyline and heritage assets, including Conservation Areas.

## **Climatic Factors**

Documentation Accompanying the Planning Application: *A Sustainability Assessment, including an 'Energy Demand and Renewables Option Assessment' is proposed to be included at planning application stage.*

### **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. Any building services plant will be designed to minimise NOx emissions rates. A Demolition and Environmental Management Plan (CEMP) will be prepared in order to control environmental effects such as dust emissions, and 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**

The proposed development will be built in line with current sustainability policy. The project will follow the principles of Be Lean, Be Clean and Be Green, built to modern standards. The existing building is of low environmental quality owing to its previous use as a warehouse. In addition, the development will increase the amount of soft landscaping and biodiversity opportunities. While the site is located in a Critical Drainage Area, the proposal incorporates sustainable drainage systems to mitigate these impacts, and incidences of flooding or storm surges are therefore unlikely to impact on users or be exacerbated by climate change. Furthermore, the proposal encourages sustainable modes of transport with a reduced car

parking ratio from the original application, with mixed-land use discouraging the need to travel further distances.

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 Land Contamination Assessment will be undertaken along with the application. This should 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*

The site is within a historically industrial area. As such, there is potential for sources of contamination related to its and the surrounding land uses. There may be materials which could harm human health present in the existing warehouse buildings. To ascertain the likely level of contamination, a Preliminary Risk Assessment undertaken by a suitably qualified person will be required as part of a Phase 1 ground conditions survey / Land Contamination Assessment as described above.

#### Construction

There is limited risk during the demolition and construction phases, given the nature of the existing use and the proposed uses. Appropriate mitigation measures would be implemented should localised contamination be encountered.

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 and compliance with regulatory waste disposal controls and hazardous material management will be required during the construction of the proposed development, to ensure that the works are undertaken in an appropriate manner. These would be set out in the CEMP. 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 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 and EIA.

## **Daylight, Sunlight and Overshadowing**

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

Documentation Accompanying the Planning Application: *A Daylight, Sunlight and Overshadowing Assessment should be submitted at planning application stage.*

## 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 buildings.

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 site was previously tested against daylight, sunlight and overshadowing impacts and was found to be in a very high level of compliance with BRE guidance and found acceptable in planning terms. The subject proposal follows a similar layout to the previous consent (which ranged from three storey mews houses, and six buildings of between four to nine storeys in height), but with an increase in height under this proposal to now consist of six buildings of between four to twelve storeys. The increase in height relates to the previously nine-storey block is on the eastern side of the site, whereas the properties requiring previous testing were to the west of the site along Stag Lane.

The operation of the proposed development will introduce buildings up to 12 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 a context where tall buildings are 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. Any future planning applications will be subject to an assessment of daylight, sunlight and overshadowing impacts. 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: *Ecology and Biodiversity Assessments, and bat surveys will be completed as part of the application submission.*

Three listed SINCs (Sites of Importance for Nature Conservation) are within 500m of the site, consisting of: LBB Grade II area surrounding one of Silk Stream's channels (Tramway Brook) 85m to the south-east; LBB Grade II area bordering Westfield's College's athletics grounds (Grove Park) 185m to the south-east; and London Borough of Barnet designated Silk Stream (Grade unknown), 385m east of the site.

Brent's 2014 SINC review notes that Tramway Brook and Grove Park could potentially support reptiles, amphibians, birds, invertebrates and foraging bats, and although limited in extent, these areas will have high relative value to invertebrates. However, there are no habitats of principal importance within Grove Park or Tramway Brook and the sites are not linked to other designated sites.

The site contains no areas of statutory nature conservation and there are no such sites within the immediate vicinity of the site. There are no SPA, SAC or Ramsar designations within 5km of the Site. Closest Local Nature Reserve is located approximately 1.2km to the south of the site. Closest SAC (Special Area of Conservation) is Richmond Park, approximately 15km south of the site. The closest National Nature Reserve is Ruislip Woods which is located 10k west of the site. Nearest AONB is the Chilterns AONB, located approximately 18km north-west of the site. The closest RAMSAR site and SPA is Lee Valley Regional Park, approximately 15.8km north-east of the site.

The development site appears to have limited on site ecological assets, although Plot 2 includes some unmanaged scrubland between the existing commercial property's perimeter fence and Stag Lane's east pavement. There are several trees and bushes situated within this area of scrubland on the west and northern boundary of Plot 2. These trees are under a tree preservation order (TPO).

Recent ecological investigations on the site have identified potential for nesting birds.

### **Construction**

A range of standard mitigation measures may be required to reduce potential adverse impacts on biodiversity, such as timing of demolition/ construction activities, relocation of bats (if applicable) and controls on lighting.

There are no environmental pathways such as water courses through which the Proposal could adversely affect these protected areas. Silk Stream is located approximately 0.5km to the east of the site, but there is no hydrological connection from this site to this waterbody. However, Tramway Brook and Grove Park Grade II SINCs are located a 85m – 185m south east of the site, and there is a potential risk of water contamination from run off during demolition and construction. The potential for contamination risk would be dealt with through the implementation of appropriate mitigation in the demolition and construction phase (to be secured by standard planning condition).

## Operation

As the existing land comprises a large warehouse and hard surfacing, there is the potential for the proposed development to beneficially contribute to biodiversity of the local area through the implementation of soft landscaping and biodiversity opportunities, e.g. bird boxes, bat roosting opportunities, and a wider range of green infrastructure on site that encourages biodiversity. Whilst this is considered to be beneficial, this is not considered to be significant.

It is not considered that the proposed development will have a significant effect on the integrity of statutory or non-statutory nature conservation designations or protected species and the potential for conservation requirements and objectives would not be diminished.

There are no international, national or local protected ecological areas either in or around the site which are likely to be affected by the proposed development. There are no other areas on or in proximity of the site which are important or sensitive for reasons of their ecology that would be impacted by the proposed development due to the nature of works carried out and the lack of ecological connectivity to statutory and non-statutory sites.

## Mitigation

Suitable conditions should be in place to ensure potential adverse impacts on any existing protected species are minimised prior to and during works on site, as well as incorporation of suitable features to encourage bio-diversity resources as part of the development. The potential for contamination risk should be dealt with through the implementation of appropriate mitigation in the demolition and construction phase (to be secured by standard planning condition). Mitigation measures and compliance with regulatory waste disposal controls and hazardous material management would be set out in a CEMP.

Any vegetation clearance or demolition of buildings should occur outside of the core nesting period to avoid the disturbance and destruction of active nests. If vegetation removal is required during the period March to August, it should be preceded by a nesting bird check undertaken by a suitably qualified ecologist to confirm the absence of active bird nests.

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: *The site is located within Flood Zone 1 (areas identified as being at low risk of flooding from fluvial / tidal sources). This means that the site has an annual exceedance probability of less than 0.1% (1 in 1000) of flooding in any one year. However, the site is in excess of 1ha in area, and therefore requires a FRA. The FRA will assess all aspects of flood risk both to the proposed development itself, and in relation to the potential effect on people and property elsewhere within the surrounding catchment.*

*The site is also located within a Critical Drainage Area due to surface water ponding on Stag Lane and Roe Green. The majority of the site is considered to be at 'very low risk' of flooding from surface water. SUDS assessments / a conceptual surface water drainage strategy will be submitted with the planning application.*



## Construction

Given that the site is outside of Flood Zone 3, in the construction process there is considered to be limited risk property and people.

## Operation

The proposed development site is located in an area at low risk of flooding; however, the proposed development does have the potential to affect the onsite infiltration rates through changes to the amount of hardstanding. That said, given the scale of the development and its location within flood zone 1, the operation of the proposed development is not considered to significantly affect flood risk.

The implementation / integration of sustainable drainage techniques within the sites drainage system will mitigate the risk of flooding and protect vulnerable areas within the site.

In addition, as the site is located within the area covered by the London Plan, the surface water runoff design will need to be undertaken in accordance with the requirements of the London Plan utilising sustainable drainage systems (SuDS). As a brownfield site the design will be based on achieving a discharge limit comparable to a greenfield run-off rates of surface water run off at peak times.

In order to achieve this, the following methods will need to be considered:

1. storage of rainwater for later use
2. infiltration through use of porous surfaces to external landscaped areas
3. attenuate rainwater by storing in tanks for gradual release
4. discharge rainwater to the combined sewer

## Mitigation

Implementation and management of surface water run-off should be secured through a planning condition. The implementation / integration of sustainable drainage techniques within the sites drainage system will mitigate the risk of flooding and protect vulnerable areas within the site.

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 or air pollution) and as such, reference should be made to these sections as required. Additionally, a number of stand-alone assessments at application stage will consider the proposal's impact or secondary impacts on health and wellbeing, including (but not limited to) a Land Contamination Assessment, Air Quality Assessment, and Noise Impact Assessment.

## Land (land take)

The construction and operation of the proposed development will utilise brownfield land to provide commercial space and residential dwellings. 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**

The location of the development is not susceptible to earthquakes, subsidence, landslides, erosion, or extreme / adverse climatic conditions which could cause the project to present environmental problems.

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 Impact Assessment will be submitted in support of the application.*

### Construction

The development will give rise to some noise pollution within the vicinity of the development during construction. The foundation strategy is yet to be finalised, but there may be vibration resulting from piling activities during construction. However, impact would be temporary and is typical of construction sites in urban environments.

Machinery used during demolition/construction on site can generate new sources of noise, as well as construction traffic movements in the vicinity. The site falls within an urban environment, in close proximity to main arterial roads. 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. The impact on noise will be taken into consideration and mitigated against as required. No significant effects are therefore anticipated.

### Operation

There are likely to be deliveries to residents and commercial properties 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 commercial and 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.

Noise and vibration assessment will set out glazing requirements for the proposed development to mitigate any adverse noise impacts on the new units.

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 regarding noise and vibration controls. Plant noise should be controlled to local and national guidelines using a planning condition.

A delivery and servicing plan will be produced to proactively manage deliveries to reduce the number of delivery and servicing trips, particularly in the morning peak.

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, with an associated increase in spending in the local and regional area. This is considered to be beneficial, but not significant.

#### Operation

The proposed development would create benefits to local employment though providing permanent employment once operational (4051sqm of new commercial floorspace). The current employment density of the site is considered to be negligible as both premises are vacant, solely relating to the security of the site. The increased commercial space and housing will also increase opportunities and potential for increased spending within the local area. The development will provide housing to meet the borough's identified needs, and affordable housing will be sought, although it is not apparent at this point how much will be proposed. This is considered beneficial but not significant.

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

During construction there will be some solid waste associated with the excavation of the basement. There is therefore 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, and on the basis that no significant effects were identified for the previously approved application (which also included basement development), 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**

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 likely 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, Views and Heritage Assessment / Townscape Study will identify the extent to which the development impacts on the skyline. Verified views will be used to illustrate the visual effect of the proposed development from locations agreed in consultation with the London Borough of Brent.*

#### 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 site is located approximately 180m from Roe Green Village Conservation Area (to the south).

The proposal is likely to be visible in both short and long distance views. When viewed from adjacent relatively low density suburban areas, the development would represent a change in character. The existing townscape quality of the site is poor. The completed scheme is proposed to be of high architectural and spatial design quality that will enhance the surrounding area, such that the likely overall effect of the development on townscape would be beneficial.

The height of the proposed development will be up to 12 storeys. This is therefore a greater scale than the previously approved application (9 storeys) and the existing buildings (2 storeys). It is indicated that the 12 storey element will replace the previously approved 9 storey element, towards the east of the site. The site is surrounded to the north, east and south by other industrial and warehouse uses, two storeys in height. To the west, on the opposite side of Stag Lane, are two-story residential properties. To the south east of the application site is TNQ, a recently constructed development up to 17 storeys high above a podium. Additionally, the site is located within a proposed Tall Building Zone within the London Borough of Brent's draft Local Plan.

As such, the Council considers that although there is the potential for the proposed development to lead to 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. 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 completed to support the planning application. The site is located within an area with a public transport accessibility level (PTAL) of 2/3, which is relatively poor / moderate. The proposal therefore includes the provision of 113 vehicular parking spaces.*

#### 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, and the Transport Assessment will outline the highway and local transport network considerations of relevance, addressing any highway

network implications as a result of the proposal. Junction capacity analysis will be undertaken on key junctions as part of the Transport Assessment.

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

## Operation

The replacement of the existing circa 10,000 sqm warehouse with a mixed-use commercial and residential scheme is likely to generate greater vehicular movements than the amount of traffic related movements to the current operational use of the site, were it occupied. The proposal is subject to revised parking provision from the previously approved scheme (a reduction of 254 to 113, equating to an overall new parking ratio of 0.22 based on 502 units) will generate a differing demand, and potentially less parking movements than the previously approved scheme.

For this reason, the development will give rise to some traffic within the vicinity, but the impact of this is unlikely to be significant when taking into account the existing situation, accessibility and current use of the site, and also considering the previously approved scheme. Whilst there are likely to be vehicle movements generated by the development, this amount is not considered to be likely to have significant impacts on highway capacity on Stag Lane or Edgware Road due to the existing level of traffic and the proposal will not require any significant improvement works to the local highway network.

The Transport Assessment will outline the highway and local transport network considerations of relevance, addressing any highway network implications as a result of the proposal. Junction capacity analysis will be undertaken on key junctions as part of the Transport Assessment. The lack of on-site car parking and lack of 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 financial payments towards a local parking permit scheme, which will help to mitigate any adverse effects. Advice will be required from TfL on the impact on bus and underground network capacity. In the context of existing users, the development's effects are likely to be insignificant, although some contributions to bus and underground infrastructure may be required.

## Mitigation

A CLP should be secured that includes standard mitigation measures to control transport movements (potentially as part of the CEMP).

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: *An Operational Waste and Recycling Management Strategy (Residential and Commercial Uses)* will be submitted. A CEMP will be sought as part of the planning process to deal with demolition and construction waste matters.

## Construction

The site will generate waste, principally building materials during the demolition, occupation, decommissioning and construction stages. During demolition there will be some solid waste associated with demolition of existing buildings, excavation of the basement including some dust generating waste material comprising concrete and soil.

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. Solid wastes will be managed at each stage of the project in line with current legislation, policy and guidance. Mitigation measures and compliance with regulatory waste disposal controls and hazardous material management will be set out in and secured through the CEMP. No significant effects are therefore anticipated.

## Operation

Once operational, there will be domestic waste containing food, liquid, organic matter. An operational waste management strategy will be developed to ensure that the development proposals will meet waste objectives and targets outlined in national, regional and local planning policy, including those in Brent's Householder Waste Collection Strategy. 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. Commercial waste is covered under the same legislation as construction waste, above.

If the application is approved, the decision notice should include suitable conditions to ensure that waste facilities for residents and businesses 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 should be addressed in the Land Contamination Assessment and the CEMP that will be required as part of the application/ permission process.*

The site has historic industrial use with potential for various compounds that could adversely affect water quality within the ground if disturbed. The site however, is not located within or close to a groundwater Source Protection Zone. Silk Stream is located approximately 0.5km to the east of the site, however there is no hydrological connection from the site to this waterbody. Tramway Brook, a Grade II SINC, is located approximately 85m from the site.

## 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. 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 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. While it is not expected that there will be any hazardous, toxic or noxious substances generated by the proposed development once operational, 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 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 Land Contamination Assessment 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 implementation and management of SuDS and associated pollution control mechanisms for surface drainage should be secured through 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 (Microclimate) assessment will be submitted at planning application stage.*

#### 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 12 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. Additionally, a pedestrian level wind desk based assessment was provided against the previous development proposals. The assessment deemed the microclimate to be acceptable for the intended use, even during the windiest seasons, requiring no mitigation and being suitable for the comfort of pedestrians.



The subject proposal follows a similar layout to the previously approved scheme with marginal increases in height. A Wind (Microclimate) assessment will be undertaken and submitted at application stage. If required, 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 of other development sites adjacent or within the vicinity that might generate transport movements along Edgware Road, including those located within the London Borough of Barnet.

Of the applications identified, one had been subject to an Environmental Impact Assessment (H/00342/09 – London Borough of Barnet, Colindale Hospital). The Council has considered the information contained within this assessment related to the individual impacts, and also the associated cumulative impacts of the proposals.

Five other applications had been subject to Environmental Screening but not subject to an EIA (12/2166 – Oriental Way; 14/2930 – Silver Works / Sarena House; H/00093/16 (London Borough of Barnet) - Former College Plot Within the Former Colindale Hospital; H/05856/13 (London Borough of Barnet) – Edition / British Library Newspapers; 17/0837 – 1-8 Capitol Way). One of these consists of an EIA screening for a previous application at this subject site.

### **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. While it is accepted that there may be an increase in traffic generated due to the scheme, the amended development proposes fewer parking spaces (113) than the previously approved development, which proposed 254 parking spaces. The previous scheme was not considered to have a significant effect upon traffic generation in the area in conjunction with other proposals such that an EIA would be required related to this issue.

It is anticipated that CIL and S106 and other funding streams from Government and service providers will address capacity issues that might exist in relation to on and off-site infrastructure.