

P20-0242/HC/KM

04 October 2021

Planning and Building Control
London Borough of Brent
Brent Civic Centre
Engineers Way
Wembley
HA9 0FJ

Dear Sir/Madam

Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)
Request for Screening Opinion
No. 421 and 423 (Symal House) Edgware Road, NW9 0HU

Under Regulation 6 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017 (as amended), our client, Edgware Stone Developments Ltd., requests a Screening Opinion from the London Borough of Brent ('the Council') in relation to the demolition of the existing buildings and proposed residential-led mixed use redevelopment at No. 421 and 423 (Symal House) Edgware Road, NW9 0HU ('the Site').

Regulation 6 of the EIA Regulations state that a request for a screening opinion shall be accompanied by:

- a) *a plan sufficient to identify the land;*
- b) *a description of the development, including in particular*
 - i) *a description of the physical characteristics of the development and, where relevant, of demolition works;*
 - ii) *a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;*
- c) *a description of the aspects of the environment likely to be significantly affected by the development;*
- d) *to the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from –*
 - i) *the expected residues and emissions and the production of waste, where relevant; and*
 - ii) *the use of natural resources, in particular soil, land, water and biodiversity; and*
- e) *such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.*

This information is set out within this letter and enclosed Site Location Plan.

For reasons set out below, it is the opinion of Edgware Stone Developments Ltd. that the proposed development is not EIA development and therefore an Environmental Statement (ES) to accompany the application for full planning permission is not required.

Site Description

The Site is 0.5ha in size and comprises No. 421 and 423 (Symal House) Edgware Road. It is bordered by Edgware Road (A5) to the east, Carlisle Road to the south and Holmstall Avenue to the north.

Symal House is a three storey U-shaped building located at the junction of Edgware Road and Holmstall Avenue. Symal House is identified as a Locally Listed Building, principally because of its association with Walter Segal and the 'self-build method'. As per originally designed, the building is currently in use as offices, however the building benefits from Prior Approval (Class O) for conversion to 45no. self-contained studio units under Ref. 20/1311, which was granted in June 2020. Further, a two-storey rooftop extension scheme (Class AA) for 20no. units was granted in August 2021 (Ref. 21/0132).

No. 421 Edgware Road is a two-storey brick building, with forecourt car parking and access from Carlisle Road, in use as a tyre/car garage. The Site also comprises a petrol filling station (PFS), fronting Edgware Road. The lawful use of No. 421 is therefore Sui Generis.

Located within the London Borough of Brent [LB Brent], the Site also lies on the boundary with the London Borough of Barnet [LB Barnet] which extends to the eastern side of Edgware Road.

The Site is identified in Brent's adopted Policies Map (2016) as falling within:

- Colindale/Burnt Oak Opportunity Area – This is a London Plan designation for an additional 12,500 new homes.
- Colindale/Burnt Oak Growth Area – Edgware Road is promoted for mixed use regeneration, including 2,500 new homes.
- Air Quality Management Area.

In the Emerging Local Plan, the Site is within:

- Growth Area.
- Capitol Way Valley (BNSA1).
- Tall Building Zone.
- Air Quality Management Area.
- Intensification Corridor.

The Site is not within, or located within proximity of, a Conservation Area. The nearest Listed Building is 'Mecca Bingo Club' (Grade II), c. 150m to the north on Burnt Oak Broadway. The 'Milestone between The Greenway and Annesley Avenue' is Grade II Listed. This is c. 150m to the south of the Site, on Edgware Road.

The Site is not located in or adjacent to a SSSI, SAC, SPA or Ramsar Site and is not in or adjacent to a Local Nature Reserve. Brent Reservoir comprises a Local Nature Reserve and SSSI, and is located 3.5km to the south of the Site.

The Site is located within an Air Quality Management Area (AQMA). The Brent Air Quality Action Plan 2017-2022 identifies measures to manage air pollution in the affected areas.

The Site is located entirely within Flood Zone 1 which indicates a low probability of flooding. The Council's Surface Water Management Plan (2011) states that the Site is located within a Critical Drainage Area (Capitol Way Commercial Area).

The Site has a PTAL of 3/4 indicating 'good' access to public transport accessibility. Burnt Oak Station to the north (c. 600m) and Colindale Station to the east (c. 800m) are both located on the London Underground Northern Line. There are several bus routes along Edgware Road which provide access to Central London, as well as Edgware, Borehamwood, and Watford.

Surrounding Area

The Edgware Road (A5) is a major arterial route which is a dominant feature of the site's immediate setting. The surrounding area is mixed in character with suburban, detached/semi-detached properties to the north and west on Holmstall Avenue, industrial warehouses and units to the immediate west on Carlisle Road, and some larger scale developments to the south further along Edgware Road.

This includes:

- Burnt Oak (Catalyst Housing Group) – 76 residential units and 925sqm commercial floorspace in a 7 storey building. [Ref. 13/2062].
- The Northern Quarter (NEAT Developments) - 460 units, 5,360sqm of retail, with a tower (17 storeys plus podium). [Ref. 08/2823].
- Silver Works (Galliard Homes) – 227 units, as well as affordable workspace, across 2-6 storeys. [Ref. 14/2930].
- Green Point [LB Barnet] – 86 residential units, c. 1,600sqm commercial floorspace, in a building of up to 8 storeys. [Ref. W00407AZ/07].
- Utility Warehouse [LB Barnet] – 17 storeys.
- 1 Colindale Avenue [LB Barnet] – 7 storeys.

- Zenith House [LB Barnet] – 18 storeys.

There are also current applications/recently permitted schemes to the north, including:

- 1 Burnt Oak Broadway – Part 7/8 storey building to provide co-working space and purpose-built shared living units, and café. [Ref. 20/1163, awaiting decision].
- 100 Burnt Oak Broadway [LB Barnet] – 100 residential units, 1,718sqm of A1/D2 floorspace in a building of between 4 and 12 storeys. [Ref. 19/1049/FUL, granted April 2020].

As well as those to the south, including:

- 1-8 Capitol Way (NEAT Developments) - 500 residential units, across buildings of 4-12 storeys. [Ref. 19/4545, granted June 2021].
- 399 NW9 (FMAS Oriental City) – 520 residential units across 8 buildings (up to 9 storeys). [Ref. 12/2166, granted June 2013].
- Imperial House (The Hyelm Group) [LB Barnet] – 102 residential units and 499sqm commercial/office floorspace, ranging in buildings from 3-16 storeys. [Ref. 19/2897/FUL, granted October 2020].
- 381-397 Edgware Road – 4/5/18 storey building, comprising 563sqm retail floorspace and 110 residential units. [Ref. 17/2284, granted July 2021].
- 363 Edgware Road – 165 residential units with commercial use at ground floor. Buildings of 19, 17, 14, 8, 6, and 5 storeys. [Ref. 21/1124, awaiting determination].
- Colindale Station [LB Barnet] – Replacement railway station ticket hall building, mixed use development ranging from 6 to 29 storeys in height comprising 860sqm commercial floorspace and up to 313 residential units. [Ref. 19/0859/OUT, granted March 2020].
- Green Point [LB Barnet] – Addition of 2 storeys to provide 34 residential flats. Building would comprise 10 storeys. [Ref. 20/6267/PNU, granted June 2021].

Burnt Oak Town Centre is located c. 500m to the north of the Site.

Proposed Development

The description of proposed development comprises:

"Demolition of No. 421 and 423 (Symal House) Edgware Road and erection of building ranging in height up to 20 storeys (maximum building height 65m) (plus basement) to provide up to 270 residential units (Use Class C3) with convenience foodstore (Use Class E) and 3no. commercial units (Use Class E) at ground floor (up to maximum 2,000sqm Class E), together with associated basement and ground floor car parking (up to 55 spaces); cycle parking; vehicular access (Carlisle Road / Holmstall Avenue) and highways works (including provision of delivery bay to Carlisle Road / Holmstall Avenue); private amenity space; public realm and landscaping."

This request for a Screening Opinion provides the maximum quantum of development allowing an element of flexibility that could be accommodated on the site through the ongoing design of the scheme. It will also ensure that the environmental effects of the development proposals are considered in full as part of this request.

EIA Screening Requirements

The EIA Regulations define 'EIA development' as development which is either 'Schedule 1 development' or 'Schedule 2 development' that is *'likely to have significant effects on the environment by virtue of factors such as its nature, size or location'*.

The proposed development can technically be categorised as a Schedule 2 development within the EIA regulations, specifically falling within section 10 'Infrastructure Projects', subsection (b) 'Urban Development Projects'. The Site is not considered to lie within a "sensitive area" as defined by the EIA Regulations, (i.e. within a Site of Special Scientific Interest or European site, National Park, Area of Outstanding Natural Beauty, World Heritage Site or Scheduled Monument) and therefore the applicable thresholds/criteria for defining a development as Schedule 2, section 10b, are:

- i) "the development includes more than 1ha 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 proposal exceeds the threshold identified within part (ii) as the development proposes up to 270 dwellings. It is therefore appropriate to request a Screening Opinion from the Local Planning Authority to determine whether it is considered that there are any significant effects likely to arise from the proposed development.

Schedule 2 developments only require an EIA to be completed if it is considered they are *"likely to have significant effects on the environment by virtue of factors such as its nature, size or location"* (Regulation 2, Interpretation of 'EIA development'). As discussed further below, we do not believe that the proposed development will result in significant environmental impacts in EIA terms and therefore will not require an Environmental Statement (ES) to accompany any application.

Schedule 3 (Regulation 5(4)) of the EIA Regulations identifies the 'selection criteria for screening Schedule 2 development', which are categorised under three general headings: characteristics of development; location of development; and types and characteristics of the potential impact. An assessment of the relevant criteria within each of these headings

(and subsequent subheadings) is considered in turn below.

1. Characteristics of development

a) Size and design of the whole development

The Site extends to 0.5ha in size. This is below the applicable threshold of 1ha of urban development which is not dwellinghouse development, and 5ha of overall area of development as set out within Schedule 2 of the EIA Regulations.

The characteristics of the development would not have a significant urbanising effect, due to the surrounding built form of the urban area within which the Site is located. The Site is also located in the designated Colindale/Burnt Oak Growth Area which is undergoing significant intensification over a much wider area.

The proposals constitute a mix of uses, including up to 270 residential units, along with a convenience foodstore and 3no. commercial units. The proposed height of the building will vary, with the tallest element being 20 storeys. The design will comprise three distinct blocks, in a perimeter block arrangement which allows for public facing street frontages to the three edges of the site. The scheme has been designed so that massing is concentrated on the corner of Carlisle Road and Edgware Road and the height of the scheme steps down to the north and west.

The development would be of a type and scale consistent with other development in the wider Growth Area, including the Northern Quarter (17 storeys), 1-8 Capitol Way (4-12 storeys), 399 NW9 (up to 9 storeys), and Imperial House (up to 16 storeys). The proposed development would be viewed within the context of these existing, and emerging, tall buildings.

The nature and size of the development is unlikely to result in 'significant impacts', as defined within the 'screening threshold guidelines' set out within the National Planning Practice Guidance (NPPG – March 2014), which support the EIA Regulations.

The table accompanying paragraph 4-057-2070720 of the NPPG entitled 'Thresholds and Criteria for the identification of Schedule 2 development requiring EIA and indicative values for determining significant effects', discusses the issues important to consider in determining whether significant effects are likely in a given proposal.

For section 10(b) development, this guidance states "*EIA is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a*

high level of contamination." In relation to sites which have not previously been intensively developed, the guidance states that EIA is more likely to be required if:

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

Paragraph 4-057-2070720 of the NPPG then goes on to state that the figures above *"are indicative only and are intended to help determine whether significant effects are likely. However, when considering the thresholds, it is important to also consider the location of the proposed development. In general, the more environmentally sensitive the location, the lower the threshold will be at which significant effects are likely. It follows, therefore, that the thresholds below should only be used in conjunction with the general guidance on determining whether Environmental Impact Assessment is required and, in particular, the guidance on environmentally sensitive areas."*

Whilst it is recognised that the scale of the development is greater than existing and that there are currently no residential dwellings on the site, it should be noted that the Site is not a "sensitive area" as defined in the Regulations. Furthermore, it is located within a brownfield site within a markedly urban area designated as a Growth Area, which is already characterised by numerous major residential developments along Edgware Road that are of a similar scale. Therefore, when considering the specific context of the Site, it is not considered that the proposed development would have significant effects and, in turn, according to the NPPG guidance, it is therefore considered the proposed development would not require an EIA.

Furthermore, the proposed commercial/retail use is not considered to be on a significantly greater scale than the existing level of commercial use already in operation on the site.

The careful consideration of the design of the development, specifically the siting of built form and proposed heights as discussed above, will ensure that effects are avoided or mitigated as far as possible and hence not significant.

Such 'integral' mitigation has driven the design process so to ensure any impacts are reduced as far as possible; in this manner, it is not considered that significant impacts are likely to occur.

b) Cumulation with other existing development and/or approved development

According to Schedule 3 (the Selection Criteria for Schedule 2 Development), it is noted

that consideration should be given to “*cumulation with other existing development and/or approved development”*. This is further noted in the NPPG at Paragraph 024, reference 4-024-20170728, which states “*Each application (or request for a screening opinion) should be considered on its own merits. There are occasions, however, when other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development. The local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development.*”

The proposed redevelopment of the Site is not considered to be likely to cause any significant impact when considered cumulatively with the other identified sites, so as to require an EIA. The mitigation required for the proposed development is considered to relate solely to localised impacts which are not significant in environmental terms. Such impacts can be identified and addressed through supporting specialist reports for the planning application which will ensure that any minimal potential environmental effects are given appropriate consideration. These supporting studies are to include *inter alia*:

- Air Quality Assessment.
- Basement Impact Assessment.
- Contaminated Land Assessment.
- Daylight & Sunlight Assessment.
- Design and Access Statement.
- Drainage Strategy and Flood Risk Assessment.
- Ecology Assessment/Biodiversity Net Gain Report.
- Energy and Sustainability Assessment.
- Fire Statement.
- Foul Sewage and Utilities Assessment.
- Geo-Environmental Phase 1 Desk Top Study.
- Heritage Statement.
- Lighting Assessment.
- Noise Assessment.
- Overheating Assessment.
- Planning Statement.
- Townscape and Visual Impact Assessment.
- Transport Assessment and Travel Plan.
- Wind Micro-climate Assessment.

Notwithstanding this, an exercise has been undertaken to identify any major approved applications within the vicinity of the subject site which may give rise to significant cumulative effects. The following major development schemes have been permitted or implemented within the vicinity of the Site.

To the south of the Site, including along Edgware Road, the following developments have been approved and mostly constructed:

- **Burnt Oak (Catalyst Housing Group) | Ref. 11/0403, as amended by 13/2062** | *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 landscaping (as amended by plans received on 19 April 2011), subject to a Deed of Agreement dated 03/06/2011 under Section 106 of the Town and Country Planning Act 1990, as amended. | Granted 03 June 2011*
- **Silver Works Development | Ref. 14/2930** | *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), proposed vehicular access from Grove Park, provision for car/bike parking on the basement and ground level and associated landscaping and amenity space, subject to a Deed of Agreement dated 29 January 2015 under Section 106 of the Town and Country Planning Act 1990, as amended. | Granted 30 January 2015*
- **'399' Development, Oriental Way | Ref. 12/2166** | *A hybrid planning application, as amended by plans received 1 November 2012, for the demolition of all existing buildings and structures and: full planning permission (Phase 1) for comprehensive mixed-use development comprising full planning permission the erection of a 7,817sqm gross external area (GEA) Class A1 retail foodstore 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); podium slab along Airco Close; a site-wide energy centre; associated car parking spaces, motorcycle parking spaces and cycle parking spaces; associated landscaping and public realm works; new vehicular access from Grove Park and vehicular access from Plaza Walk and associated highway works; and outline planning permission (Phases 2 and 3) comprising residential floorspace (Class C3, accompanied by illustrative residential accommodation schedule indicating 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). | Granted 27 June 2013*
- **The Northern Quarter (land at junction of Edgware Road and Capitol Way) | Ref. 08/2823** | *Demolition of existing units and 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, 5,360m² of retail (Use Class A1 bulky goods), a 734m² garden centre, 1922m² of floorspace for alternative uses falling within Use Classes A uses (A1, A3) or B1 (a-c), and 649m² for alternative uses falling within Use Classes A uses (A1, A3), Class B1 or Class D1 (community/health centre), 97m² of creche facilities (Use Class D1), 281 residential car-parking spaces, 500 residential cycle-parking spaces, 172 commercial car-parking and 80 commercial cycle-parking spaces, 527m² energy centre, bin stores and associated landscaping, with access from Capitol Way NW9 and Plaza Walk NW9 | Granted 30 September 2009

- **1-8 Capitol Way | Ref. 17/0837** | *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, subject to Deed of Agreement dated 12 November 2018 under Section 106 of Town and Country Planning Act 1990, as amended. | Granted 12 November 2018*

To the north of the Site, the following have been approved:

- **100 Burnt Oak Broadway | Ref. 19/1049/FUL [LB Barnet]** | *Demolition of existing building and erection of a mixed use building between four and twelve storeys high, comprising of 100 residential units with 1718.8sqm of Class A1/D2 uses at lower ground, ground floor and part first floor levels. Associated amenity space, refuse storage, cycle stores and provision of 4no. disabled parking spaces at lower ground floor level (with space for an additional 6 as needed). | Granted 30 April 2020*
- **381-397 Edgware Road | Ref. 17/2284** | *Demolition of existing buildings and erection of a new mixed use building comprising commercial uses and residential units, with associated car parking, cycle storage, plant and shared external amenity space at first and fifth floor level with other ancillary works. Subject to a legal agreement dated the 2nd of July 2021. | Granted 02 July 2021*
- **Imperial House, The Hyde | Ref. 119/2897/FUL [LB Barnet]** | *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 associated soft and hard landscaping, ancillary refuse and recycling storage, car parking, wheelchair parking, cycle parking and servicing arrangements | Granted 06 October 2020*

Further to the south east of the Site, the following applications have secured planning approval (LB Barnet):

- **Green Point | Ref. 20/6267/PNU** | *Addition of two storeys to provide 34 residential flats. Associated parking, refuse/recycling.* | Granted 15 June 2021
- **Colindale Station | Ref. 19/0859/OUT** | *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* | Granted 10 March 2020

To the south of the Site, the following application is awaiting determination:

- **363 Edgware Road | Ref. 21/1124** | *Demolition of showroom and multi-storey carpark building and erection of a ground plus part 19, 17, 14, 8, 6 and 5 storey building to provide 165 residential units (Use Class C3) with commercial use (Use Class E) at ground floors, together with associated parking at basement and landscaping.* |

To the north of the site, the below application is awaiting determination:

- **1 Burnt Oak Broadway | Ref. 20/1163** | *Partial demolition, restoration and extension of former bingo hall (Use Class D2) to create a part-7, part-8 storey building to provide co-working space and purpose-built shared living units (Use Class Sui Generis), café (Use Class A3) with ancillary facilities and associated shared amenity space, landscaping, cycle and disabled parking.*

The proposed development would complement and be in keeping with the nature and scale of the existing and proposed tall buildings set along Edgware Road and in the surrounding vicinity including those detailed above, which comprise a mix of commercial and residential uses and as such it is not considered this would result in significant cumulative impacts.

The transport assessment to be submitted in support of the planning application will consider cumulative transport effects of the proposed development. This will provide the baseline for noise and air quality assessments, where necessary.

c) Use of natural resources

The proposed redevelopment of this brownfield site for residential and commercial uses

will not result in the significant use of natural resources, such as land, soil, water, or biodiversity, in either the construction or operation of the proposed development.

The effects of the design, construction and operational management on natural resources is addressed within the wider consideration of the sustainable approach to the development. Therefore, whilst the proposed development will unavoidably result in the use of some natural resources, there would be no significant impact.

d) Production of waste

Whilst the proposed development will generate waste through both the demolition and construction phase and once operational, opportunities will be identified to seek to maximise the reduction, reuse, recycling, and recovery of waste.

It is considered that standard mitigation measures and construction best practice would assist in reducing these potential effects to non-significant levels.

Waste generated through the demolition and construction phase will be managed in accordance with a Construction Management Plan which will detail the measures for sustainable management of waste generated from the Site, and can be secured by way of planning condition.

Refuse storage facilities will be provided on site for waste generated by the proposed residential and commercial uses. The anticipated volumes to be generated are not significant and the treatment of the municipal waste would be standard.

Once operational, the site would not generate significant volumes of waste; rather, it would be typical for a building of this scale and use. Furthermore, the operational waste is also not anticipated to be hazardous in nature.

e) Pollution and nuisances

It is not considered the proposal for residential and commercial uses would result in significant effects in relation to pollution and nuisance, particularly as a commercial use is already successfully operating from the Site.

In respect of transport matters, the Site located in an area with a Public Transport Accessibility Location (PTAL) rating of 3/4 (indicating 'good'). The proposed development will give rise to some traffic, noise and air pollution within the vicinity of the development but the impact is unlikely to be significant when taking into account the existing situation, accessibility, and the vehicle movements associated with the current lawful use of the site

as offices (Class E), a car repair and tyre fitting centre and a petrol filling station (Sui Generis).

Therefore, whilst there will be vehicle movements generated by the development when operational, this amount is not considered to be so likely to have significant impacts on highway capacity and the proposal will not require any significant improvement works to the local highway network. A Transport Assessment will accompany the planning application submission. Vehicle movements associated with construction works will be temporary in duration and it is considered that standard mitigation measures and construction best practice would assist in reducing any potential effects to non-significant levels.

In respect of air quality, the Site is located within an AQMA. Traffic resulting from the proposed development has potential to impact air quality, however the impact is unlikely to be significant when taking into account the sustainable location of the site and the existing lawful use of the Site as offices, a car repair and tyre fitting centre and a petrol filling station. Notwithstanding this, an Air Quality Assessment will accompany the planning application which will give due consideration to this and identify mitigation measures for any identified adverse impacts if necessary, the implementation of which can be secured through condition.

It is also considered that with good practice construction measures and strategies that can be secured by condition, the significance of dust and fine particulate matter effects from the construction phase would be considered not significant. Air quality effects are therefore not considered to be significant in EIA terms.

In respect of noise, road traffic comprises the dominant source of background noise in the area. The proposed uses are not considered to be detrimental to the residential amenities of the local population. The greatest potential source of noise from the proposed development, once operational, will arise from vehicle use, and the proposed commercial uses. However, such noise emissions are not expected to result in adverse effects, particularly in light of the existing lawful use as referred to above.

During the construction phase there would be potential for increased noise levels and nuisance associated with construction works. However, these will be temporary in nature and management and mitigation measures will be used to control and limit these, which can be secured through planning condition, to ensure the effects of construction on neighbouring amenity are mitigated.

The Site is located on land that has had a previous contaminative use and as such there

is potential for historic ground contamination. A Contamination Report (Phase 1 Desk Top and Phase II Intrusive Testing) will accompany the planning application to identify potential effects of the proposed development and recommend appropriate mitigation measures. Given the nature and scale of the proposed development, the impact is unlikely to be significant and therefore EIA is not considered necessary, given environmental consideration can be appropriately given through determination of the proposal and subsequently managed during the construction and operational phases of the development.

f) Risk of major accidents and/or disasters relevant to the development concerned

There is no undue risk of major accidents or disasters relevant to the development concerned, which could impact upon the environment.

g) Risks to human health

As considered above, given the nature of the residential led proposal, it is not considered the uses will be unusually complex and so it is unlikely the proposed development poses any potentially hazardous environmental effects or high risk of accidents. The risk to human health arising from the proposed development are unlikely to result in significant adverse impacts.

2. Location of development

a) Existing and approved land uses

The Site comprises Symal House which has a lawful use as offices and No. 421 Edgware Road which comprises a two-storey brick building, with forecourt car parking, in use as a tyre/car garage. The Site also comprises a petrol filling station (PFS).

b) The relative abundance, availability, quality and regenerative capacity of natural resources in the area

The land on which the proposals are to be delivered is brownfield land in an urban area. There are no natural habitats on site or any other natural resources that would be directly affected by the proposals. As such the proposed redevelopment of this brownfield site is not considered to have an adverse impact on local natural resources.

c) The absorption capacity of the natural environment

Specifically, the Regulations require particular attention is paid to the following areas:

- (i) wetlands, riparian areas, river mouths;

- (ii) coastal zones and the marine environment;
- (iii) mountain and forest areas;
- (iv) nature reserves and parks;
- (v) European sites and other areas classified or protected under national legislation;
- (vi) areas in which there has already been a failure to meet environmental quality standards, laid down in retained EU law and relevant to the project, or in which it is considered there is such a failure;
- (vii) densely populated areas;
- (viii) landscapes and sites of historical, cultural or architectural significance.

The site is not considered to lie within a "sensitive area" as defined by the EIA Regulations. There are no statutory nature conservation designations within, or adjacent, to the site. Indeed, the site does not form part of any wetland, coastal zone, mountain or forest area, nature reserve, European sites, nor in an area defined in part vi. The site and its immediate context are also not subject to any statutory or non-statutory, local, or other landscape designations such as an Area of Outstanding Beauty (AONB).

The Site is of low ecological value and does not provide suitable habitat for protected species. A Tree Survey will be submitted with the application.

The nearest nature conservation designation is Brent Reservoir which comprises a Local Nature Reserve and a Site of Special Scientific Interest (SSSI), and is located 3.5km to the south of the Site. The SSSI/LNR consists of approximately 69ha and is designated due to its interest primarily for wintering and breeding wetland birds associated with the open water habitat and in particular for significant numbers of nesting great crested grebe.

The Site is not within the SSSI Impact Risk Zone.

Masons Field and Fryons Country Park LNR are c. 3km to the south west of the Site.

It is not considered that the proposals will have any impact on Brent Reservoir SSSI and LNR or Masons Field and Fryons Country Park LNR for the following reasons:

- No habitats present on the Site which could accommodate wintering and breeding wetland birds from Brent Reservoir, nor environmental pathways (such as waterways) to which the proposed development could adversely affect any of these protected areas; and
- Recreational footfall on the designated sites from an increase in residential use of the area is unlikely to elevate disturbance above current levels. The Site lies within a wider area offering a number of recreational activities.

As such, Brent Reservoir SSSI/LNR and Masons Field and Fryons Country Park LNRs are unlikely to be directly affected by the proposed development at the site.

The site is located wholly within Flood Zone 1 (low risk of fluvial and tidal flooding) and is at low risk of flooding from these sources. Whilst the Site is also identified as being located within a Critical Drainage Area, the main source of flooding is overland flow and surface water ponding in topographic depressions. A Flood Risk Assessment and Drainage Strategy will be submitted with the planning application and sustainable drainage measures will mitigate the risk of flooding and protect vulnerable areas within the Site. Therefore, it is unlikely that significant effects will arise as a result of the proposed development.

The nearest Listed Building is 'Mecca Bingo Club' (Grade II), c. 150m to the north on Burnt Oak Broadway. The 'Milestone between The Greenway and Annesley Avenue' is Grade II Listed. This is c. 150m to the south of the Site, on Edgware Road. These heritage assets are visually separated by the surrounding built form which limits any direct visibility to them. Views are also impeded by street furniture and trees. It is therefore not considered the proposed development of the site would have significant impacts on these designations.

Symal House comprises a Locally Listed Building. Whilst not afforded statutory protection, NPPF Paragraph 203 requires a balanced judgement of the loss of any 'non-designated heritage assets'. As the proposals comprise the complete demolition of the non-designated heritage asset, this would unavoidably result in a complete loss of significance. As per NPPF Para 203, this loss would need to be balanced against the public benefits of the wider scheme.

A Heritage Statement and Townscape and Visual Impact Assessment will be submitted as part of a planning application to ensure that any effects with regard to the setting of heritage assets are not significant.

The Site is located within a densely populated area which is covered by an Air Quality Management Area (AQMA) designation. An Air Quality Assessment will identify residual effects of the proposed development to be considered through determination of the application. However, in relation to the operational phase, the proposed development will provide opportunity to reduce air pollution through delivery of sustainable development such as renewable energy. It is considered that with good practice construction measures and strategies that can be secured by condition, the significance of dust and fine particulate matter effects from the construction phase would be considered not significant.

Given the relatively low sensitivity of the receiving environment and the nature of the proposals, it is considered the Site has the capacity to accommodate development without significant environmental effects which would warrant an EIA.

3. Types and characteristics of potential impact

Consideration to potential impacts have been noted in the above commentary, however it is not considered that the magnitude, spatial extent, nature, intensity, complexity, duration, frequency or reversibility of impacts would be significant given the nature of the development and location of the site, as detailed further below. As noted, and listed earlier within this letter, technical assessments will be provided alongside any application submission and assist in identifying any further required mitigation measures to avoid potential impacts where at all possible.

a) The magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected)

Due to the limited environmental sensitivity of the Site to the proposed development, as a result of the Site's urban nature, the development impact is considered to be confined to the immediate vicinity of the Site.

b) The nature of the impact

The nature of the potential impacts arising from the proposed development are predictable and the magnitude is considered to be low. The impacts will include air quality and noise impacts arising from traffic, and temporary impacts arising from the construction phase. However, the impacts are not considered to be significant as set out above.

c) The transboundary nature of the impact

There are not expected to be any transboundary impacts.

d) The intensity and complexity of the impact

There are not expected to be any unusual or complex impacts arising from the proposed development. No environmental standards will be breached, nor any protected sites be affected. As a previously developed site, the intensity of the impacts will not be significant, and the impacts will not be unusual for the Site's location in the wider surrounding Growth Area.

e) The probability of the impact

The effects of the proposed development can be easily identified, and the probability of any effects determined with reasonable confidence.

f) The expected onset, duration, frequency and reversibility of the impact

Potential impacts arising from the proposed development will commence from implementation of the scheme. Construction effects would be short term in duration. Once the proposed development is operational, the residual impacts will be permanent.

g) The cumulation of the impact with the impact of other existing and/or approved development

The proposed development forms part of the wider Colindale/Burnt Oak Growth Area and as such a number of other developments are approved/expected to come forward in the surrounding area as detailed in the section above. The proposed development will ensure appropriate measures are in place to prevent significant adverse effects arising as a result of cumulation with other developments.

h) The possibility of effectively reducing the impact

Whilst significant effects are not considered likely, several potential mitigation measures have been identified as mentioned throughout this letter and will sought to be included within the final proposals. The careful consideration of the design of the development, specifically the siting and massing of the built form, will ensure that effects are avoided or mitigated as far as possible and hence not significant. Potential impacts can also be mitigated through securing planning conditions or a S106 agreement.

With the inclusion of such measures, allied with the nature of the site and proposed development, it is not considered there will be significant impacts which would be required to be assessed within an ES.

Summary

Under Regulation 6 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017 (as amended), Edgware Stone Developments Ltd requests a Screening Opinion from London Borough of Brent Council in relation to land at No. 421 and 423 (Symal House) Edgware Road, London, NW9 0HU.

The site extends to 0.5ha of brownfield land. It is located within the Colindale/Burnt Oak Growth Area and the Emerging Local Plan identifies the site as appropriate for mixed use development.

It is recognised that the proposed development subject to this Screening Request can technically be categorised as a Schedule 2 development within the EIA Regulations, specifically falling within Section 10 'Infrastructure Projects', (b) 'Urban Development Projects'. The proposal exceeds one of the thresholds identified in relation to Section 10b

and it is therefore appropriate to request a Screening Opinion from the Local Planning Authority.

As the Council will be aware, Schedule 2 developments only require an EIA to be completed if it is considered that they are 'likely to have significant effects on the environment by virtue of factors such as its nature, size or location'.

The site is within an urban setting and it is anticipated to be of a low ecological value. The site does not lie within or in close proximity to a 'Sensitive Area' as defined under the EIA Regulations. As set out in the letter, it is our view that the proposed development is not likely to have significant effects on the environment by virtue of factors such as its nature, size or location, and consequently does not require an EIA.

We look forward to receiving the Council's response to this Screening request within the designated 3 weeks timeframe on receipt of this request, as stated in the EIA Regulations (Part 2, 6(6)).

I trust this letter and enclosures provides all the information you require, however should you have any queries, please do not hesitate to contact me.

Yours faithfully

Pegasus Group

