

SLR Consulting Limited  
**By email**

08 May 2024

Dear Sir / Madam,

**Re: Bridge Park, Stonebridge EIA Scoping Opinion.**

Thank you for your e-mail on the 4<sup>th</sup> April 2024 requesting the Council's scoping opinion on the scope of the Environmental Statement for the redevelopment of the Bridge Park site in Stonebridge. To assist, you submitted a detailed EIA Scoping Report. The Council consulted Statutory Consultees as identified in the EIA Regulations 2017 (as amended) on the proposed scope. It also consulted others it considered whose input might assist in identifying a suitable scope for the submitted Environmental Statement. There was a four week period for all to respond. Consultation responses have been summarised in Appendix A of this opinion. Copies of the full responses are also provided with this opinion. The planning related issues raised should be considered in relation to both the technical reports required in association with the application, and where appropriate the EIA.

**Council's Scoping Opinion:**

The Council considers that the EIA Scoping Report March 2024 prepared by the applicant for the Bridge Park development to be a comprehensive document which is consistent with the requirements of the regulations and associated guidance. It considers that the scope of the Environmental Assessment should be as set out in that report taking account of the consultation responses appended for items scoped in. It is agreed that for the purposes of the Assessment that it should focus on the matters laid out in section 6 of the report, including matters identified as having a potentially significant impact relating to: Townscape and Visual; Ground Conditions and Contamination; Noise and Vibration; Air Quality; Ecology and Vibration; Traffic and Transport; Wind Engineering; Daylight, sunlight and Overshadowing; and Socio-Economics. This leaves the matters scoped out as being insignificant, as set out within section 7 of the report, as falling under: Flooding and Water Environment; Utilities; Energy and Sustainability; Tree Survey and Arboricultural Impact Assessment; Heritage and Culture; Resource Efficiency; Infrastructure; Population and Human Health; Climate and Carbon Balance; Risks of Major Accidents and/or Disasters; and Transboundary Effects.

A summary of consultee responses can be found in Appendix A of this document. These include comments from the Environment Agency, Natural England, Historic England, Network Rail, and Transport for London. These may contain some comments that although falling outside the remit of the EIA the applicant will need to address in any planning application submitted.

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

Yours sincerely

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

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## **APPENDIX A**

### **Summary of consultee responses:**

#### ***Environment Agency –***

Support approach to addressing flood risk at the planning stage via a Flood Risk Assessment, with it being scoped out of the Environmental Assessment. We do however have concerns regarding the approach to flood risk, which does not adequately assess the risk of fluvial flood risk. The site is wholly within Flood Zone 3a for fluvial flooding, and therefore the separation distance from the sources are not sufficient to negate any flood risk, as has been identified. The modelling must consider compensating for the loss of floodplain due to the increased built footprint.

Paragraph 7.1.4, regarding flooding adaptation and mitigation approach, is of concern, as we do not support water entry strategies for residential developments (as per paragraph 69 of the PPG) and will not accept the use of stilts or voids for flood plain storage compensation (as per PPG for Flood Risk and Coastal Change). All alternative options for floodplain compensation must be assessed. No loss of fluvial flood storage capacity, for floods up to the 1% annual probability + climate change, must be demonstrated. This should allow for climate change and seek to deliver a net flood risk benefit wherever possible. Stilts and voids do not guarantee floodplain capacity is retained as voids do not allow for water to flow through them, and becoming blocked with silt, detritus and generally being used for storage.

7.1.5 notes the submission of a FRA. This is expected to include, but not be limited to: details of finished floor levels at all elevations (must be a minimum of 300mm above 1% annual probability + climate change); a climate change allowance appropriate to the vulnerability of the use (see linked guidance); a hydrostatic water pressure assessment; and consideration of safety, including access/egress for both a design and extreme flood event.

4.4 – Any loss of flood storage must be compensated for by the reduction in level of nearby ground, such that the same volume is available at every flood level before and after works, and that it can drain freely. If this method is to be used, the applicant needs to provide topographical surveys of the site before and area to indicate flood depths and flow routes.

6.2 - We support the proposal for the environmental statement to scope in ground conditions and contamination and reiterate that the proposed development sits upon an Aquifer.

7.2 - Support early consideration of water consumption and associated benefits. See recommendations.

#### ***Historic England –***

Support proposed approach of scoping out heritage and culture, and addressing at planning within a separate Heritage Impact Assessment. The height of the proposed development could mean that distant heritage assets could be impacted. The assessment should therefore clearly demonstrate the extent of the proposed study area and why this is suitable given the proposed heights.

#### ***Natural England –***

Annex A to their letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development. This includes advice regarding the

below which is primarily generic standing advice, and not specifically related to the proposal here:

- General principles
- Biodiversity and Geodiversity
- Nationally designated sites
- Regionally and Locally Important sites
- Protected Species
- District Level Licensing for Great Crested Newts
- Priority Habitats and Species
- Ancient Woodland, ancient and veteran trees
- Biodiversity net gain
- Landscape and visual impacts
- Heritage Landscapes
- Connecting People with nature
- Soils and Agricultural Land Quality
- Air Quality
- Water Quality
- Climate Change
- Contribution to local environmental initiatives and priorities

#### ***Network Rail –***

Submission of significant material which generally relates to Network Rail as adjacent landowners/ stakeholders in the site, and which is not specifically relevant to this EIA scoping, although should be taken into consideration by the applicant.

#### ***Transport for London (Spatial Planning) –***

Reference new cycleway adjacent to site.

A Healthy Streets Transport Assessment should be undertaken. T5 compliant cycle parking should be provided.

The car free elements are supported. The residential element is not car free despite being in close proximity to a range of public transports which would make car free development realistic. Further, as noted above, active travel infrastructure within the area is being improved. Taking the highest PTAL for the site (4) which should be used when determining appropriate parking provision, the site should be car-free in accordance with London Plan policy. The 67 spaces general parking spaces should therefore be removed.

The following documents will be required to support any planning application:

- Strategic and local highway modelling will be required
- If there are any proposed changes to the highway network, a Road Safety Audit
- A gateline capacity assessment of Stonebridge Park Station and line load capacity analysis of the Bakerloo Line and Overground services is also required
- a Construction Logistics Plan
- A Delivery and Servicing Plan
- A Framework Travel Plan
- A Parking Design and Management Plan

In addition to the various transport contributions that will be secured as part of the S106, the site is liable to pay Mayoral CIL2 and this is subject to indexation and the applicant should be fully aware of the regulations.