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Dear Avison Young,

**Environmental Impact Assessment Screening Opinion Town and Country Planning
(Environmental Impact Assessment) Regulations 2017**

Proposal: Request for Screening Opinion as to whether an EIA is required in respect of an application for the development of the former Argenta House site in Stonebridge to deliver 180 new residential units within one 30 storey tower in addition to the naturalisation of the brook.

Site: Argenta House, Stonebridge

This Screening Opinion has been prepared in relation 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". The site falls within Schedule 2 10 (b) (ii) as it includes over 150 dwellings (180 proposed), and therefore a formal Screening Opinion is required.

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.

Yours sincerely,

Paul Lewin
Spatial and Transportation Planning Manager

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 EIA is required in respect of an application for the development of the former Argenta House site in Stonebridge to deliver 180 new residential units within one 30 storey tower in addition to the naturalisation of the brook.

Site – Argenta House, Stonebridge

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

Avison Young have been notified that, as a result of the proposal falling within Schedule 2 10 (b) (ii) development, the proposal is required to be subject to a Screening Assessment. Associated with this request, details of the site boundary, proposed development and an initial assessment of the potential impacts of the proposed development, taking account of associated technical studies, has been submitted to support this request in December 2024.

The Existing Site and Surrounding Area

The 0.15ha site is immediately adjacent to Stonebridge Park underground (Bakerloo Line) and Lioness Overground line (Watford to Euston) to the south-west. To its north is the low rise residential suburbs of Tokyngton, as well as the 24 storey Wembley Point to its north east, which itself is positioned in a large plot surrounded by level parking. This site has secured permission (22/0784) for redevelopment to provide 3 additional blocks, including one immediately adjacent to the site at 32 storeys. The Old North Circular, and North Circular Road proper, runs along the south east of the site, adjacent to which is the Unysis and Bridge Park development site, itself to be redeveloped in the near future. Further to the south west is the Northfields development, formerly industrial land, now being redeveloped to provide over 3,000 new homes. Beyond to the south east is the Park Royal industrial estate, which under the planning jurisdiction of the Old Oak and Park Royal Development Corporation (OPDC), is the largest industrial site in the London, and the location at which HS2 and the Elizabeth Line are set to meet. The site is allocated in the Local Plan for mixed use redevelopment (BSSA6) and is located within the Stonebridge Tall Building Zone.

In terms of the site itself, it is currently cleared and includes scrub, but was formerly occupied by the two storey Argenta House office building and a kiosk. The Wembley Brook also runs through the site, and includes sloping banks down to a central canalised section.

The site is well connected by public transport, achieving a Public Transport Accessibility Level (PTAL) of 4. This reflects the site's adjacency to Stonebridge Park station, providing access to the Bakerloo line and Lioness line to Watford and central London, and adjacent bus stops servicing the station, and those which run along the North Circular and Harrow Roads.

The site is not within a Conservation Area or Site of Archaeological interest, and neither does it include any listed buildings.

The closest listed buildings and structures include the Grade II Listed Brent Viaduct ~250m to the south, Grade II Listed Stonebridge Park Public House ~500m to the south, and the Locally Listed 1 Morland Gardens ~1000m to the east.

As the site includes a section of the Wembley Brook, it is almost wholly within Flood Zones 3a and 3b for fluvial and tidal, and partly for 3a surface water flooding.

The site is also within an Air Quality Management Area, and an Air Quality Focus Area due to its proximity to the strategic road network.

The Size and Design of the Proposed Development

The proposed development is to deliver 180 new residential dwellings within one 30 storey tower. The site is 0.15ha in size, and includes a portion of the Wembley Brook. As part of the redevelopment of the site, the Wembley Brook will be naturalised.

Information Provided in Support of the Request for a Screening Opinion

The applicant has provided a supporting statement to assist in the determination of the Screening Opinion. This is alongside reference to existing reports provided as part recent pre-applications, the consented applications (18/4847 & 21/4642), and documents associated with the redevelopment of adjacent sites.

Previous History

The site was formerly occupied by the two storey Argenta House office building and a kiosk. The site received planning permission in 2020 under 18/4847, amended under 21/4642 in 2022 to include two additional storeys, for a 26 storey residential development comprising 141 homes. Construction started in late September but stalled in the summer of 2023 as the owner went into administration. The applicant now seeks to secure a new permission reflecting the site's new context, and other changes such as to planning and building control, including fire safety and the requirement of an additional stair core.

Large Scale Development within the Vicinity

Within the vicinity there are currently the following applications for significant developments which have not yet commenced/ been completed to take account of when assessing the impact of the cumulative impact of the proposed development subject of this screening opinion in association with other developments:

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

A2, A3, A4 and A5); and 1,610 sq. m (GEA) of community and leisure floorspace (Use Classes D1 and D2), including a community centre and nursery; together with new basement level including energy centre, associated storage, cycle and vehicle parking, new vehicular accesses, associated highway works to Beresford Avenue, landscaping and creation of new public and private open space, ancillary facilitating works, various temporary meanwhile uses, interim works and infrastructure. (Granted 28/09/2018).

Started.

22/2341/FUL (LB Ealing) – Twyford Abbey Nursing Home, Twyford Abbey Road, Park Royal - Development to provide a total of 326 self-contained residential units comprising; phased construction of seven blocks of flats (ranging from two to six-storeys); two two-storey detached dwellinghouses (following demolition of existing gatehouse); and a terrace of two-storey dwellinghouses in the grounds of Twyford Abbey (all Use Class C3); conversion of Twyford Abbey (Grade II Listed) into flats (Use Class C3) and provision of residents lounge; demolition of workshop attached to the Grade II listed walled garden and replacement with a single storey dwellinghouse (Use Class C3); facilitated by repair; refurbishment; infill and rooftop extensions; demolition of post-war extensions and other pre-war structures within grounds, excluding the cottage; retention and repair of the Grade II listed walled garden and attached cottage to provide ancillary facilities management accommodation and residents facilities; comprehensive landscaping works including removal and works to trees and groups of trees protected by a Tree Preservation Order; provision of permissive publicly accessible open space and grow gardens; provision of gated cycle and pedestrian access onto North Circular (A406) and new access onto Twyford Abbey Road; provision of hardstanding parking areas; ecological enhancement works; and other associated constructions works including installation of boundary treatment. (Granted 09/02/2023). **Not started.**

22/0784 – Wembley Point, 1 Harrow Road – Planning application for the redevelopment of site including the erection of 3no. buildings, comprising residential dwellings (Use Class C3), flexible commercial floor space (Use Class E), indoor sports facility (Use Class E) and associated parking, landscaping and enabling works, subject to Deed of Agreement dated 25 July 2024 under Section 106 of Town and Country Planning Act, 1990, as amended. (Granted 31/07/2024). **Not started.**

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.

Development Plan

The Brent Local Plan (2019 – 2041) is the key strategic document to guide and manage development in the borough. The development plan also comprises the West London Waste Plan (2015) and the London Plan (2021). Together these documents provide spatial policies, development management policies and site allocations to guide and manage development in the borough.

An Integrated Impact Assessment (IIA) accompanies the 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. 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.

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 180 residential units. As such, it exceeds the threshold for 150 dwellings, and therefore the proposed development therefore constitutes 'Schedule 2 development'.

Consideration must therefore be given to whether the proposed development may give rise to significant environmental effects, such that an EIA may be required.

Likely Significant Effects

The ultimate stage in the screening process is to consider whether it is '*likely to have significant effects on the environment by virtue of factors such as nature, size or location*'. As required by regulation 5(4)(c), where a relevant planning authority has to decide whether Schedule 2 development is EIA development, they must take into account the selection criteria set out in Schedule 3 as are relevant to the development.

The Council has taken into account the selection criteria set out in Schedule 3, where relevant to the proposed development. This includes the characteristics of the development, the environmental sensitivity of geographical areas likely to be affected, and the likely significant effects in relation to these criteria, with regard to the factors specified in regulation 4(2) and taking into account the types and characteristics of the potential impact listed in paragraph 3.

In addition, as required by regulation 5(5)(a), where the relevant planning authority adopts an EIA Screening Opinion they must state the main reasons for their conclusion with reference to the relevant criteria listed in Schedule 3. Within this Statement of Reasons, the Council has stated the main reasons for their conclusion, referencing the relevant criteria listed in Schedule 3 as appropriate.

The Council has concluded that the proposed development does not require an EIA to be undertaken to accompany a planning application for the proposed development, as the proposed development is not likely to generate significant environmental effects – Appendix A (below) sets out the reasoning for this decision.

Appendix A – Consideration of Likely Significant Effects

Air Quality

The site is located within the Brent Air Quality Management Area (AQMA), and Brent Air Quality Focus Area (AQFA) for the North Circular Road. The majority of Brent has been designated as an AQMA, and therefore even small increases in emissions can lead to adverse effects. The AQMA has been declared for exceedance of the annual mean national objective for nitrogen dioxide (NO₂) and the 24 hour mean national objective for particulate matter (PM₁₀). Brent has a total of 21 AQFA's, incorporating the 11 identified by the London Mayor in addition to 10 further sites identified by the Council. These are designated in locations that not only exceed the EU annual mean limit value for nitrogen dioxide (NO₂), but are also locations with high human exposure, such as this stretch of the North Circular Road which includes a significant number of sensitive residential receptors.

There are a number of sensitive receptors in close proximity to the proposed development site, primarily including existing and granted residential properties to the North and west.

Documentation Accompanying the Planning Application: The applicant makes reference to the air quality assessment submitted under the approved application. It is anticipated that an Air Quality Assessment, and Air Quality Positive Statement will be provided for any forthcoming application. As the site is within an AQFA, this will need to demonstrate the achievement of Air Quality Positive Development, in accordance with Local Plan policy BSUI2.

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 of the 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. The effect of dust soiling and PM₁₀ can be reduced to negligible with the implementation of appropriate mitigation measures. These standard mitigation measures can be implemented through a construction environmental management plan (CEMP), which can be secured through a standard planning condition.

As such, whilst there is the potential for adverse effects as a result of the proposed construction, with the implementation of standard mitigation measures, it is not anticipated that the effects would be significant.

Operation

Air quality emissions during operation will be from new traffic generation and heating infrastructure, although heating will be via heat pumps which have limited on-site emissions.

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 main road.

The application is to include 3 disabled parking spaces, providing a low parking ratio, to meet disabled parking needs. Overall, when taking account of visitors, deliveries and servicing etc., the development is expected to give rise to an Annual Average Daily Traffic (AADT) rate of 105 vehicles per day. This is significantly beyond what would be expected for the existing site, although this is expected given the significant increase in intensity of use. The accompanying report identifies that this is well below the Air Quality Management Guidance threshold of 500 AADT which would typically warrant a detailed assessment. In any case, the applicant would be expected to provide an assessment to demonstrate the achievement of air quality positive to comply with policy. As such, limited impacts are expected to arise from new trips and heating systems.

Given the site's proximity to the North Circular, significant mitigation is required to ensure proposed residents are not exposed to unacceptable levels of air pollution. To ensure good indoor air quality and to mitigate against overheating without the need for exposure to outdoor noise and air pollution, individual units will likely require Mechanical Ventilation with Heat Recovery (MVHR), including air purification.

With the implementation of standard mitigation measures, and other measures in accordance with Development Plan policy, significant effects are therefore not anticipated.

Mitigation

A CEMP should be secured that includes standard mitigation measures to reduce emissions.

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 to determine the origin of a particular dust nuisance.

Suitable operational mitigation to be secured through mechanisms in the building design and services including MVHR with air purification, and associated planning conditions to ensure that new internal receptors are adequately protected.

Archaeology

The site is not located within an area of Archaeological Interest and is not within 1km of any such designation.

Documentation Accompanying the Planning Application: No archaeology assessment has been submitted.

Construction

The site has been previously developed, and therefore archaeological resources are likely to have been previously disturbed.

As a result, it is not considered that there is the potential for significant effects. If required, standard mitigation measures can be secured through condition e.g. a watching brief.

Operation

The operation of the completed development is not anticipated to affect archaeological receptors.

Mitigation

Archaeological conditions should be attached to the decisions notice, if identified as a requirement by GLAAS.

Built Heritage

Documentation Accompanying the Planning Application: The site is not within a Conservation Area or Site of Archaeological interest, and neither does it include any listed buildings. The closest listed buildings and structures include the Grade II Listed Brent Viaduct ~250m to the south, Grade II Listed Stonebridge Park Public House ~500m to the south, and the Locally Listed 1 Morland Gardens ~1000m to the east. Tokyngton (250m to the north) and Stonebridge (500m to the east) Recreation Grounds are also locally listed parks.

Construction

There will be no direct construction effects on built heritage, as there are no heritage assets located on the site.

Operation

The height of the proposed development will be up to 30 storeys, and therefore a greater scale than that previously on site. The site however is located within a Tall Building Zone where development greater than 10 storeys is allowed. Development up to 32 storeys has been granted adjacent to the north, whilst other tall development is anticipated and or granted to the south at Northfields and the east at Bridge Park.

Given the emerging context and the absence of listed assets within the immediate vicinity of the site, impacts are not considered to be significant.

Mitigation

During construction, ensure the erection and maintenance of hoarding.

Climatic Factors

Documentation Accompanying the Planning Application: No specific documentation has been provided. Any forthcoming application will need to be accompanied by the following documents given the proposal will be referable to the Mayor: Wind Microclimate Assessment, Sustainability Statement, Whole Life-Cycle Carbon Assessment, Energy Statement including Overheating Assessment, and a Circular Economy Statement.

Construction

Emissions from construction traffic and plant can contribute towards the region's greenhouse gas emissions. Due to the size of the proposed development the emissions are not considered to be substantial, and therefore no significant effects are anticipated. It is advised that sustainable methods of working should be implemented to reduce any emissions and should be implemented as part of the CEMP.

The development will include the use of physical resources which include embodied carbon. The application seeks to reduce the use of materials by taking a fabric first approach, and 'being lean', reducing the embodied carbon of the development by 10% below Building Regulations part L. To achieve Net Zero, the applicant is also expected to provide a financial contribution compensating for any shortfall against the net zero target, which will contribute toward the Council's Carbon Offset Fund. The need to consider the whole life carbon and circular economy will also serve to reduce embodied carbon emissions. The immediate impact of the embodied carbon is not considered to be significant.

Operation

The sustainable building methods to be utilised to minimise development energy consumption will be set out within the above listed documents. The applicant, to achieve planning permission, will be expected to comply with the Development Plan requirements on energy reduction and sustainability. The development will be car free, and rely on heat pumps for heating and hot water, which itself will require the building to be thermally efficient to allow for operation.

It is therefore considered that the proposed development will be able to achieve the necessary carbon reduction targets, through actual reductions, and combined with financial contributions secured through planning obligations as a last resort. Overall, the effects of which are neutral. Supporting information notes that sustainable design and construction will be a key aspect of the proposals, ensuring compliance with regional and local planning policies.

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. Other required documents will ensure sufficient mitigation measures are put in place to ensure acceptable outcomes.

The s106 will need to be worded to ensure that any required carbon reduction off-set payments are secured.

Contaminated Land

Documentation Accompanying the Planning Application: A brief desk based assessment has been provided.

The site's previous use was as an office building which was in place since the 1970's. Prior to this the site itself was not in use being adjacent to the brook. As such, limited contamination is anticipated. Proximity to the site, and occasional flooding does however present the possibility of contaminated deposits being washed onto the site and accumulating over time. Currently the brook is canalised. The proposal seeks to renaturalise this. Part of this process will involve clearing out the existing structure and deposits, thus minimising the presence of contaminations on site. Therefore, although some contamination may be present, this will be addressed via the works associated with the renaturalisation of the brook, and therefore residual impacts are unlikely to be significant.

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. 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 limited parking (3 spaces) and the implementation of flood mitigation and adaptation such as SuDS and associated brook naturalisation 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 Ground Investigation Report including a soil 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.

Daylight, Sunlight and Overshadowing

Documentation Accompanying the Planning Application: An initial assessment of the proposed impacts on daylight, sunlight and overshadowing has taken place and includes the use of 3D modelling, along with an initial town and visual impact assessment. A full assessment will be required as part of any forthcoming application.

The development includes a building that is up to 30 storeys height. The site is immediately adjacent to residential uses to the north west, and proposed receptors in the Wembley Point development to the north. To the south is the Stonebridge Park station, beyond which is substantial railway land. To the south is a wide expanse of the North Circular Road. The above report considers the impact of the proposal against BRE industry standards during construction and operation.

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 operation of the proposed development will introduce a 30 storey building 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. The associated daylight and sunlight assessment will provide evidence as to how the application has considered and been designed with this in mind to be within acceptable industry standards and policy compliance limits. Given the site's location within a tall building zone and designation for redevelopment in the Local Plan, some change in the area is anticipated. The applicant's assessment notes that the Vertical Sky Component (VSC) of 5 properties located along Tokyngton Avenue will experience some reduction, although all of these properties, and those within other adjacent residential developments less impacted, are within acceptable tolerances in accordance with BRE guidelines.

It is acknowledged that 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.

Mitigation

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

Biodiversity (including flora and fauna)

Documentation Accompanying the Planning Application: A desk based assessment has been relied upon for the purposes of the EIA report.

The site does not have either a statutory or non-statutory nature conservation designation. It has some incidental vegetation in the form of bramble scrub associated with its vacant status and proximity to the brook. This was more significant prior to the site being cleared for redevelopment following planning consent. The site is now predominantly sparsely vegetated urban land, as identified by the applicant.

The accompanying documentation notes that the site does not comprise Habitats of Principle Importance (HPI) and are of limited ecological importance. A previously undertaken bat survey in 2018 did not record any bat activity, with no potential for roosting.

Construction

It is noted that a Construction Environment Management Plan (CEMP). This will ensure pollution, spread of invasive species and harm to protected species are mitigated, and that the landscape is protected. As such, no significant effects are considered to be likely.

Operation

There is the potential for the proposed development to beneficially contribute to biodiversity of the local area through the implementation of ecological enhancement measures e.g. by including bird/ bat boxes, and achieving a biodiversity net gain, and renaturalising the brook. Whilst this is considered to be beneficial, this is not considered to be significant.

Mitigation

There are no designated sites (SSSI or LNR) within sufficient range of the site to be affected by the construction or operation of the site. The CEMP will ensure any impacts associated with the brook are minimised. Therefore, no significant impacts are anticipated.

Flood Risk

Documentation Accompanying the Planning Application: Preliminary assessments, and those associated with the extant consent have informed the report. The applicant notes that a Flood Risk Assessment and a Foul / Surface Water Drainage Strategy will be submitted with any forthcoming application.

The site is in Flood Zone 3 for both fluvial and tidal, and surface water flooding. This is associated with the presence of the Wembley Brook which runs through the site and is currently canalised. As the site is designated in the Local Plan, it was subject to a Level 2 Strategic Flood Risk Assessment, along with the rest of the Wembley Point section of the site. The assessment provided the following summary for the site:

'The site currently has risk associated with fluvial flooding being with the exception of one small part wholly within Zone 3, with a large proportion identified through current modelling as functional floodplain (3b). No development should take place within what is identified as functional floodplain. An exception to this might be possible for the Argenta House part of the site where existing structures in the floodplain if amended could reduce flood risk, through for example reducing river flow potentially being blocked by debris, if not increasing the volume of structures within what would be classed as functional floodplain. The depth of flooding for the 1:100 event brings significant risks. Given the mixed-use status of the site, less vulnerable uses should be put on lower floors and more vulnerable uses on the upper floors. If the ground floors of buildings are designed to be above fluvial level 3 + 70% + 30cm then this is likely to create space underneath for other ancillary uses (such as parking) if required. The footprint of development within flood zone 3 should not be greater than existing, unless compensatory measures are included to not increase flood risk elsewhere. Surface water flooding should be addressed through ground levels, building placement, and a drainage strategy to reduce ponding, reduce off-site flows and keep buildings away from flood risk. Basements will not be appropriate in this location. Flood resilience should be built into building structures that will potentially be exposed to flood waters. Access to safe refuge places should be provided for times of flood, with evacuation processes and points agreed with the Council's emergency planning team.'

The applicant has appointed consultants to ensure these matters are addressed satisfactorily in conversation with the Environment Agency. This is to ensure that the proposed development is safe for occupiers, integrating necessary adaptive and mitigative measures as appropriate, and ensuring that on-site flooding is reduced, whilst ensuring the potential for flooding is not increased elsewhere. This was successfully achieved by the extant application which was signed off by the EA, and is therefore considered possible to address satisfactorily through a planning application under any forthcoming application.

Construction

Given the application will be delivered in accordance with recommendations from the EA and resultant flood risk assessment, and will be accompanied by a CEMP, the construction process is considered to have limited risk to property and people. As such, the construction of the proposed development is not considered to significantly affect flood risk.

Operation

The proposed development site is largely located in Flood Zones 3 for both fluvial and tidal, and surface water flooding. Fluvial flooding potential is to be reduced via the renaturalisation of the brook. Adaptive measures will be taken to ensure that should flooding take place, property and people remain safe in terms of damage, and access and egress from their homes. As such the ground floor seeks to occupy parts of the site at less risk of flooding, with other areas being stilted over the flood zone, provide raised ground levels, and do not include habitable floorspace. In terms of surface water flooding, water will discharge to the brook as in the consented application, although on-site measures to reduce run-off rates will be provided, including the naturalisation of the brook. The proposed development does have the potential to affect the onsite infiltration rates through changes to the amount of hardstanding. Providing the application accords with Development Plan policy, and achieves greenfield run-off rates, the operation of the proposed development is not considered to significantly affect flood risk.

In addition, as the site is located within the area covered by the London Plan, and within an area of high surface water flooding potential, the surface water runoff design will need to be undertaken in accordance with the requirements of the London Plan utilising sustainable drainage systems (SuDS). The application would also be expected to achieve greenfield run-off rates, typically with maximums of 2l per second per hectare.

Mitigation

The implementation and management of SuDS should be secured through a planning condition to mitigate against any potential surface water flooding.

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.

Land (land take)

The development would take place on a previously developed brownfield site with no other use in an urban area. The proposed development will therefore return the currently vacant and cleared site to its previous status being developed and not publicly accessible. Therefore no significant impacts are anticipated.

Material Assets

The construction and operation of the proposed development will utilise material assets, but given the scale of the development this is not considered to be substantial. As such, significant effects are not considered to be likely. No discipline specific mitigation has been relied upon for the EIA Screening Opinion.

Major accidents and/or disasters

It is considered that the risk from major accidents and/or disasters (both of existing and new receptors) has been appropriately considered within the relevant topic sections (e.g. climate change, flood risk) and as such reference should be made to these sections as required.

Noise and Vibration

Documentation Accompanying the Planning Application: No discipline specific documentation has been provided.

The site is immediately adjacent to the North Circular Road, which is a significant emitter of noise pollution in excess of 80 decibels. The development includes the provision of 180 residential units, and as such, these receptors will be sensitive toward this source of noise pollution.

Construction

Machinery used during demolition/construction can generate new sources of noise, as well as construction traffic movements. 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. The works will be required to adhere to the Council's Code of Construction Practise (CoCP) (e.g. restricting the time at which works can be undertaken) which ensures that adverse effects are appropriately controlled and minimised. No significant effects are therefore anticipated.

Operation

For the proposed receptors a number of measures to ensure comfortable and compliant environmental conditions need to be achieved. As above under air quality, this is likely to require the provision of MVHR units to allow for ventilation without opening windows. Other mitigation measures may include the use of triple glazing, and winter gardens. These measures would be considered suitable and sufficient to ensure indoor health and amenity is upheld.

The proposed residential use is not considered to be inherently noisy. Some noise may be generated from the operation of mechanical plant and building services, but plant noise emissions will be required to meet local policy requirements and British Standards. Adherence to these values will ensure that new and existing receptors are not adversely affected and will ensure that there will be no significant effects.

The scheme will essentially be car free, with only 3 disabled parking spaces being provided. Aside from this, transport into the site is expected to be limited.

No significant effects are therefore anticipated.

Mitigation

Adherence to the Council's CoCP should be secured through a planning condition, as well as a CEMP that includes standard mitigation measures to reduce noise emissions. Plant noise should be controlled to local and national guidelines using a planning condition.

Suitable mitigation required to be included within the design of the proposed development to ensure that new internal receptors are adequately protected – including the use of appropriate glazing.

Socio-Economic (including population)

Documentation Accompanying the Planning Application: No discipline specific documentation has been provided.

Construction

The proposed development would create benefits to local employment through providing temporary employment during construction. The Council will secure a proportion of jobs for unemployed residents, including apprentices, and associated support fees. The application through meeting policy requirements will also result in the delivery of affordable housing. This is considered to be beneficial, but not significant.

Operation

The development will be of 100% affordable homes. This will provide affordable housing for local people who are not otherwise provided for by the market. This will provide security, reduce potential for homelessness, and improve life outcomes.

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

CIL contributions will be used to mitigate the effects of increased population/users.

Soil (organic matter, erosion, compaction, sealing)

Construction

There is the potential for some loss of organic matter, erosion, compaction and sealing during the demolition/construction phase; however, given the scale of the development and the length of the demolition/construction phase, effects are not considered to be significant.

Operation

The operation of the completed development is not anticipated to affect organic matter, erosion, compaction and sealing. As such, significant effects are not considered to be likely.

Mitigation

The implementation of a CEMP during the construction phase will ensure that standard mitigation measures are implemented.

Telecommunications

Documentation Accompanying the Planning Application: No discipline specific documentation has been provided to support the applicant's screening assessment.

Given the scale of the proposed development, this should be given some consideration going forward at application stage, although generally interference is not expected and no mitigation measures are likely to be required.

Townscape and Visual Impact

The site does not lie within a London View Management Framework strategic view. Neither does it fall within a local protected viewing corridor of the Wembley Stadium arch.

Documentation Accompanying the Opinion Request: the report is accompanied by a Townscape and Visual Impact Assessment (TVIA).

The site is located within a Tall Building Zone where tall buildings are accepted and transformative change is anticipated. Adjacent to the north a building of 32 storeys has been granted. The proposal is for a 30 storey building to consider the impact of the proposed, the applicant has provided the TVIA. This will inform a forthcoming Heritage and TVIA (HTVIA), and provides visuals but no analysis or conclusions. The TVIA includes 19 viewpoints and focuses on strategic protected views of the stadium, other sensitive views where heritage may be impacted, and other viewpoints from which the development will be prominent, in addition to being adjacent to Stonebridge Park station. The site is effectively open on three sides, with only the north/ northeast boundary being immediately shared with sensitive residential receptors, and occupies a prominent location as the North Circular Road curves northwards. The TVIA identifies that these buildings will not have an unacceptable impact on the existing townscape, or existing strategic views.

Construction

The construction works are likely to require large cranes/ equipment, and therefore there is the potential for adverse effects on views and townscape. That said, given the relatively short term, temporary nature of the construction works and the scale of the development, effects are not considered likely to be significant. Supplementary mitigation can be implemented through the use of hoarding, to provide a physical/visual barrier to the works.

Operation

The height of the proposed development will be up to 30 storeys and therefore a greater scale than that previously on site or in the immediate area (up to 2 storeys). The site is however within a tall building zone, and in terms of townscape hierarchy, is adjacent to Stonebridge Park station, and could therefore serve to facilitate wayfinding. The site already has extant permission for 26 storeys. The area is subject to transformative change, being subject to numerous development proposals which exceed 10 storeys in height, including at Wembley Point, Bridge Park, and Northfields. The full HTVIA as part of the forthcoming full planning application will serve to inform the design outcomes, provide any necessary reducing in scale/massing, and justify the proposal in terms of visual impact and townscape analysis. This is considered sufficient to ensure townscape and visual impacts are sufficiently mitigated. Impacts are therefore not considered to be significant enough to warrant EIA.

Mitigation

During construction, ensure the erection and maintenance of hoarding.

Traffic and Transport

Documentation Accompanying the Planning Application: The proposal is not accompanied by any specific documentation. Any forthcoming application will need to include a Transport Statement and Travel Plan.

The site is well connected by public transport, achieving a Public Transport Accessibility Level (PTAL) of 4. This reflects the site's close proximity to Stonebridge Park LUL station, providing access to the Bakerloo line, and the London Overground from Watford to central London. The site is also within close proximity to a number of bus routes along the North Circular Road and Harrow Road.

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. The site is also well placed in relation to the strategic road network, enabling larger vehicles to access the site with greater ease and for the most part avoid smaller residential roads.

It is considered that any adverse effects can be mitigated through a construction logistics plan (CLP) (potentially included as part of the CEMP) to control transport movements.

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

Operation

The proposal is essentially car free, with only a limited amount of disabled parking spaces (3) being provided. Overall, when taking account of visitors, deliveries and servicing etc., the development is expected to give rise to an Annual Average Daily Traffic (AADT) rate of 105 vehicles per day. As the site is located adjacent to strategic A roads, including Harrow Road and the North Circular, these trips are unlikely to impact significantly on the local road network. The applicant notes that 100% of trips into the site will be via the Old North Circular Road. Currently this road has an AADT of 7,259, and therefore the proposal would result in a 2.9% increase in movement along this road. Overall, the proposal therefore represents a very small portion of local trips, and will not substantially increase the required capacity of the local road network. The proposal also seeks to contribute towards the extension of the Wembley event day controlled parking zone. Other works will serve to improve the local public realm and adjacent station. Along with the required travel plan, this will serve to reduce overall vehicular trips taken.

The lack of on-site car parking 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, which will help to mitigate any adverse effects. Advice will be required from TfL on the impact on bus and underground network capacity, although in itself the development will not generate a significant amount of additional movements on that network.

Overall, therefore no significant impacts are anticipated as a result of trips generated from the proposed development during operation.

Mitigation

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

Measures delivered in association with the transport assessment will be used to offset operational effects.

Waste

Documentation Accompanying the Screening Request: No specific documentation has been provided.

The site has already been cleared, and therefore the proposal will not be for demolition or include any waste associated with it. Some waste will, however, inevitably arise as a result of the development.

Construction

The report notes that the construction waste will be reused on and off site where possible and would be managed in accordance with the CEMP.

In addition, the implementation of standard impact avoidance measures will reduce waste from construction activities further, which can be secured through the CEMP. The works will also be required to adhere to the CoCP which ensures that adverse effects are appropriately controlled and minimised. No significant effects are therefore anticipated.

Operation

Waste will be collected and managed in accordance with all relevant legislation and guidance, and it is anticipated that operational waste will mainly comprise household and recyclable materials.

The decision notice should include suitable conditions to ensure that there is sufficient capacity for the scale of development. A site waste management plan should be secured via condition to ensure any negative impacts are effectively mitigated. With the implementation of these mitigation measures, no significant effects are anticipated.

Mitigation

Adherence to the Council's CoCP should be secured through a planning condition, as well as a CEMP that includes standard mitigation measures.

Sufficient operational waste storage and a SWMP, should be secured through planning conditions.

Water Quality (hydromorphological changes, quantity and quality)

Documentation Accompanying the Screening Request: This matter will be addressed in a number of areas, Flood Risk Assessment / Drainage Statement, Land Contamination Assessment and the DCEMP that will be required as part of the application/ permission process.

No standalone water quality assessment has been submitted, neither was there any reference to this within the material submitted.

Construction

During the construction process there is the potential to affect water quality through accidental pollution events, such as fuel spills and increased sediment, as well as the contaminated material identified on site within surface water passing through to adjacent watercourses. The implementation of standard impact avoidance measures should be secured through the CEMP. 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. 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 implementation and management of SuDS should be secured through a planning condition. This is normal practice for a major application.

Wind

Documentation Accompanying the Planning Application: No specific documentation has been provided. A Wind Assessment will be required for any forthcoming application (required for buildings 30m or more in height).

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 30 storeys in height. The proposal is effectively for one tower without a podium, although the ground floor is partially stilted, allowing for a break in air flow. Therefore, there may be adverse effects on the existing wind conditions associated with the tower rising from ground floor level. This can be assessed throughout the normal planning process. Mitigation measures can 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.

Documentation Accompanying the Planning Application: No specific documentation has been provided. The TVIA considers the cumulative impact of tall buildings. This provides 3D images of the proposing in the consented context alongside Northfields and Wembley Point developments, but does not provide an analysis or conclusion on these, deferring this matter to full application stage. The proposal is only 4 storeys taller than the extant scheme. Although this has an additional impact upon the visual impact of the scheme, the cumulative impacts are not considerably greater, with the massing being the primary consideration in this respect, which remains slender. It is therefore considered that in terms of EIA, that the proposal will be relatively subservient to existing and proposed tall buildings nearby, and will to some extent assist in their stepping down to the local lower scale development.

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, 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 site works are however very isolated to the small high density development, are accessed via roads which go immediately onto the strategic road network, and is set back some way from residential receptors.

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 is operational.

It is anticipated that CIL and S106 will address capacity issues that might exist in relation to on and off-site infrastructure. In the vicinity this is likely to mean capacity improvements to the Stonebridge Park LUL station and associated improvements to the public realm. In relation to healthcare provision, the Northfields EIA identifies moderate adverse cumulative effect is anticipated in relation to the demand on primary healthcare facilities. Taking into account the high numbers of residential units proposed arising from the proposed development and the committed developments, current provision will potentially be inadequate to meet additional demand. The committed developments provide for additional healthcare provision at the Northfields development site. If ultimately this is not delivered there may be a need to mitigate any shortfall through S106 agreements and CIL contributions.