

1-22 BROOK AVENUE WEMBLEY HA9 8PH

Environmental Impact Assessment Screening Report

Wembley Brook Properties Limited

Final October 2023

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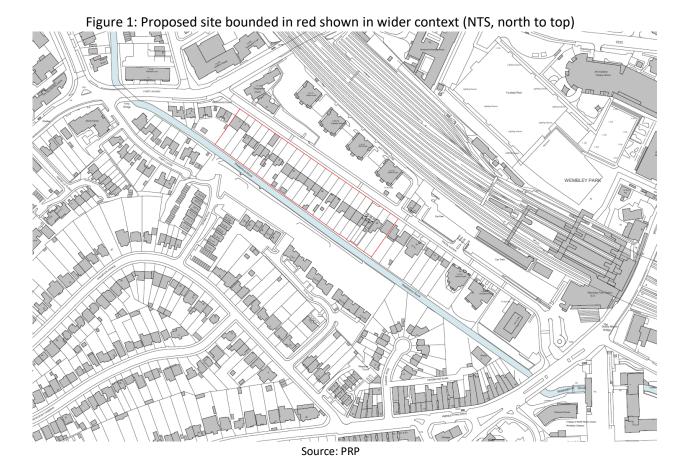
Appendix TPD1 – Location Plan reference BAW-PRP-ZZ-00-DR-A-10001 P01 (PRP)

1. Introduction

- 1.1. This Report has been prepared by Triptych PD Limited on behalf of Wembley Brook Properties Limited for the demolition of all buildings and structures and the comprehensive redevelopment of the site to provide four purpose built shared living (LGPBSL) units (sui generis) accommodating 488 co-living units and 100 dwellings (Use Class C3), ground floor commercial/community use units (Class E/F), ancillary facilities, shared internal and external amenity space with associated blue badge parking, cycle parking, refuse stores, landscaping and access arrangements. The blocks will vary in height from six to 15 storeys. Further details of the proposed development are given in Chapter 3 of this Report.
- 1.2. The Report is submitted to Brent Council ('the Council') to formally request it adopts a Screening Opinion in accordance with Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as last revised in December 2020) *i.e.* whether the proposed development is environmental impact assessment (EIA) development as defined by those Regulations.
- 1.3. In accordance with Regulation 6(2)(a), drawing number BAW-PRP-ZZ-00-DR-A-10001 P01 is enclosed (Appendix TPD1) as a plan sufficient to identify the land. Included within this Report is a description of the nature and purpose of the development and a brief description of its possible effects on the environment as also required by the Regulations.
- 1.4. The remaining structure of this Report is as follows:
 - Description of the site and surroundings;
 - Nature and purpose of the proposed development;
 - The EIA Regulations;
 - Appraisal of Schedule 3 criteria by use of a screening checklist/matrix; and
 - Conclusion.

2. DESCRIPTION OF THE SITE AND SURROUNDINGS

- 2.1. The site currently accommodates 22 traditional early 20th Century two-storey houses with pitched rooflines on the south side of Brook Avenue and immediately to the north of Wealdstone Brook. The site is 1.15ha in size. This is an urban setting and the wider area has undergone substantial change over the last two decades. High density housing developments have been built and recently consented across the street with an approval being the Wembley Park Station Car Park which has permission for 454 residential units in buildings rising up to 21 storeys. Significant development has taken place in Wembley Park across the stadium masterplan area and its environs.
- 2.2. Whilst the site boundary extends to areas classified as a PTAL rating of 3, the majority of the site has a PTAL rating of 4. The closest railway station is Wembley Park Tube Station located 470m (approximately a 5-minute walk) to the east of the site. As a result, the site is in a highly accessible location.



ENVIRONMENTAL, LANDSCAPE AND HISTORICAL DESIGNATIONS

2.3. To the rear of the site is the Wealdstone Brook and as a result it lies within flood zones 2, 3a and 3b (and a very small section in the north-eastern corner in zone 1) as shown Figure 2. In addition, there is a high risk of flooding from surface water. Residential floor levels, where possible, should

be raised above the design flood level, which has been taken as 1 in 100 year plus 20% climate change. A 300mm freeboard should be added. The maximum flood level for this event varies between blocks from 32.58mAOD to 32.65m AOD.



2.4. The site is located within the Brent Air Quality Management Area (AQMA) declared by Brent Council for specific exceedances of NO₂ (nitrogen dioxide) and PM₁₀ (fine particulates) in Air Quality Objectives (AQO) as required by the Environment Act 1995 (Part IV).

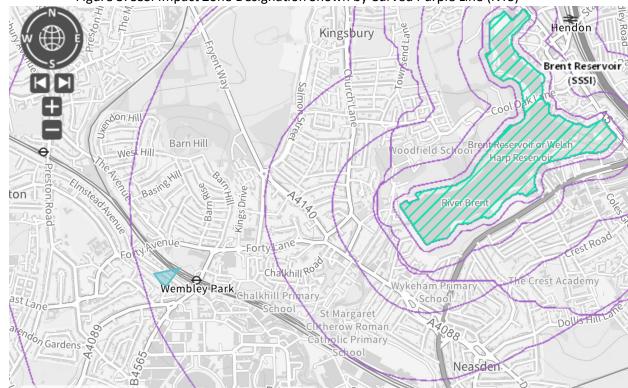


Figure 3: SSSI Impact Zone Designation Shown by Curved Purple Line (NTS)

Source: MAGIC (defra.gov.uk).

2.5. As shown in Figure 3, the site does lie within what is known as the Impact Risk Zone (IRZ) for the Brent Reservoir SSSI (shown by green hatching), which is approximately 1.8km away. IRZs are a GIS tool developed by Natural England to make a rapid initial assessment of the potential risks to SSSIs posed by development proposals. These define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal, which could potentially have adverse impacts. Local planning authorities (LPAs) have a duty to consult Natural England before granting planning permission on any development that is in or likely to affect a SSSI. The SSSI IRZs can be used by LPAs to consider whether a proposed development is likely to affect a SSSI and determine whether they will need to consult Natural England to seek advice on the nature of any potential SSSI impacts and how they might be avoided or mitigated. The SSSI Impact Risk Zone User Guidance produced by Natural England does require consultation on all applications but helpfully in Appendix 3 of the Guide¹ further advises:

Development Category	GIS Attribute Field Name	Example Description: the nature and scale of development proposals at the given location which have the potential to impact on an SSSI. Where a proposal meets the description consult NE for further advice.	Why is Natural England concerned about this type of development?
All Consultations	AllConsult	ALL PLANNING APPLICATIONS - Text may be qualified to exclude householder applications or applications in existing settlements/urban areas that do not impact on greenspace, farmland or semi natural habitats or landscape features such as trees, hedges, streams, rural buildings/structures.	All developments within or in very close proximity to SSSIs present a range of risks of direct impacts. Extending further from the sites, potential impacts on Great Crested Newts (GCN), bats and birds are also reflected in this category, as they travel several kilometres from SSSIs to breed, roost forage etc. Proposed developments outside or on the edge of existing settlements/urban areas can result in increased light pollution, loss or fragmentation of greenspace and loss or disturbance of functional habitat, all of which can affect these species.

¹ https://magic.defra.gov.uk/Metadata for magic/SSSI%20IRZ%20User%20Guidance%20MAGIC.pdf

- 2.6. With a separation distance of 1.8km and the intervening land use being urban, densely so in the main, consultation could reasonably be unnecessary. However, for robustness, it is important to understand the SSSI designation in this instance it is primarily of interest for breeding wetland birds and in particular for significant numbers of nesting great crested grebe. The diversity of wintering waterfowl and the variety of plant species growing along the water margin are also of special note for Greater London². Therefore, the reality of any impact is considered negligible, if at all.
- 2.7. In terms of historical designations, the nearest two listed buildings are in excess of 0.5km from the site. These are Brent Town Hall (Grade II), which is approximately 700m (direct) to the north-east and Wembley Hill Lodge (Grade II) to the south-west approximately 550m from the site (direct). Given the distance and nature of the proposed development including the intervening existing development/townscape, these need not be considered further.

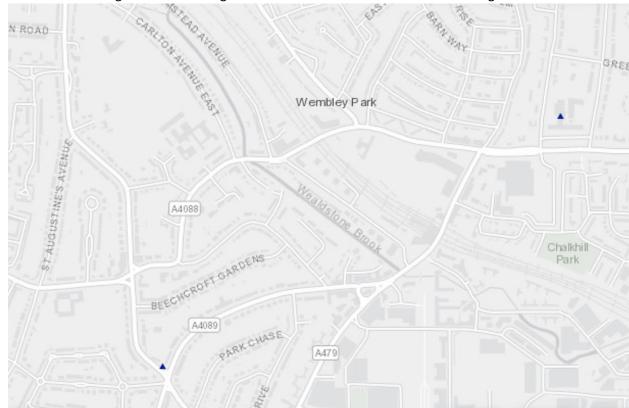


Figure 4: Blue Triangles Show Locations of Nearest Listed Buildings

 $\textbf{Source:} \, \underline{\textbf{Historic England - Championing England's heritage} \,\, | \,\, \underline{\textbf{Historic England}} \,\,$

² 1003322 (naturalengland.org.uk)

3. NATURE AND PURPOSE OF THE PROPOSED DEVELOPMENT

- 3.1. As set out broadly in Chapter 1, the proposals are for four purpose built shared living (LGPBSL) units accommodating 488 co-living units (sui generis) and 100 dwellings (Use Class C3), ancillary facilities, ground floor commercial/community use units (Class E/F), shared internal and external amenity space, associated highways works, blue badge parking, cycle parking, refuse stores, landscaping including new publicly accessible amenity and access arrangements. The blocks will vary in height from six to 15 storeys.
- 3.2. The following principles of development will allow for the Council to adopt a Screening Opinion at this pre-application stage:
 - The existing dwellings will be demolished;
 - The highest storey level will be 15 in addition to a plant storey;
 - The maximum number of co-living units will be 488 and the 'classic' C3 dwellings, it will be 100;
 - The additional proposed site area is 1.15ha.
 - The existing route of Brook Avenue will be used for the construction and operation phases.

4. THE EIA REGULATIONS

LEGAL CONTEXT

- 4.1. EIA is a systematic and objective process through which the likely significant environmental effects of a development can be identified, assessed and, wherever possible, mitigated. Screening is the first stage in the process to determine if the proposed development should be subjected to EIA.
- 4.2. EIA is within English Law through the Town and Country Planning Environmental Impact Assessment) Regulations 2017 whereby these set out the procedures required to meet those objectives (previously set out within EU Directive 2011/92/EU) within the context of the English planning system.
- 4.3. The current Regulations came into force on 16 May 2017, with a number of changes being made to the EIA process, covering Screening, Scoping and the production for an Environmental Statement.

 The last amendments were in December 2020 to take account of the exit from the EU.
- 4.4. In relation to screening proposed developments to ascertain whether they should be subject to EIA, the following principles have been established through the Regulations:
 - Any extension of time over and above the initial 3-week screening period is limited to no more than 90 days;
 - There is more focus on frontloading the provision of information and identification of mitigation; and
 - o Focus on tried and tested industry standard mitigation.

THE STEPS IN SCREENING FOR EIA

- 4.5. In determining whether the proposed development constitutes EIA development, consideration must be given to the following:
 - o If the proposed development is of a type listed in Schedule 1 of the Regulations;
 - o If not, whether it is listed in Schedule 2;
 - If so, whether it is of more than local significance, located in an environmentally sensitive area or likely to give rise to unusually complex and potentially hazardous effects; and/or
 - o It meets any of the relevant thresholds and criteria set out in Schedule 3.
- 4.6. For developments described in Schedule 1 of the EIA Regulations ('Schedule 1 development') EIA is mandatory.
- 4.7. For developments of a type described in Schedule 2 of the EIA Regulations ('Schedule 2 development') EIA may be required if the development has the potential to give rise to 'significant' environmental effects by virtue to is nature, size or location.

- 4.8. If the proposed development is of a type described in Schedule 2, then two further criteria should be considered:
 - If the proposed development exceeds the respective applicable threshold in Schedule 2;
 or
 - o If the proposed development is located in or partly located in a 'Sensitive Area' for the purposes of the EIA Regulations.
- 4.9. Should either criteria be met, the proposed development will require screening against the selection criteria set out in Schedule 3 of the EIA Regulations. Further indicative thresholds and other guidance are also provided in the National Planning Practice Guidance (NPPG) published in March 2012 to supersede Circular 02/99. If neither of the above criteria is met, the proposed development does not require formal screening for EIA.

CONSIDERATION OF THE EIA REGULATIONS

- 4.10. The requirement for EIA is either mandatory or conditional, depending on the classification of the development project. This is based, in turn, on the likelihood of significant impacts arising.
- 4.11. The proposal is not Schedule 1 development as defined by the Regulations therefore, an EIA is not mandatory. The proposals do fall within the 'catch all' criterion of Part 10 Infrastructure Projects of Schedule 2. The description of development in Part b is:

Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas.

The applicable threshold to the proposed development is as follows:

(ii) the development includes more than 150 dwellings.

With a proposed unit number of 488 co-living units and 100 C3 dwellings for the purposes of screening, the threshold is exceeded and the screening process is required. It is noted that there is no strict definition/clarification that dwellings for the purpose of EIA screening should only be Use Class C3 and in fact co-living is classed as sui generis. However, and despite there being shared facilities such as kitchens, it is a reasonable interpretation that separate units are being created. In addition, it could be interpreted that given the sui generis status *i.e.* not strictly a dwelling, then the applicable threshold for screening is:

(i) The development includes more than 1 hectare of urban development which is not dwellinghouse development.

To once again confirm, the site area is 1.15ha and exceeds this threshold.

The NPPG provides guidance where thresholds in Schedule 2 are exceeded (or fall below) and states

'....it should not be presumed that developments above the indicative thresholds should always be subject to assessment, or those falling below the thresholds could

never give rise to significant effects, especially where the development is in an environmentally sensitive area. Each development will need to be considered on its merits.'

For completeness and as previously stated within Chapter 2, it is confirmed that the proposals are not located - whole or part - in a 'Sensitive Area' as defined by the Regulations. The site is within an impact risk zone whereby the mechanism is for the LPA to liaise with Natural England at the planning application stage, albeit the Guidance allows for this to not be necessary given the distance to the SSSI and the urban character.

- 4.12. Given the exceedance of the threshold(s), the criteria described in Schedule 3 of the EIA Regulations are considered. The over-riding determination for EIA is whether the proposed development is likely to result in **significant** impacts on the environment.
- 4.13. As previously stated, Schedule 3 of the EIA Regulations set out the screening criteria in relation to proposed developments classified as Schedule 2 developments. These criteria seek to understand the character and complexity of impacts as well as any sensitives which relate to the site. In summary, the criteria fall under the following three headings:
 - Characteristics of the development taking into account the size, use of natural resources, production of waste and emissions and risk of accidents;
 - Location of the development consideration of environmental sensitivity of geographical areas likely to be affected by development; and
 - Types and characteristics of the potential impact specifically having regards to the extent, magnitude, complexity, probability, duration, frequency and reversibility of the impact.

To assist in the evaluation of Schedule 3 criteria, an EIA Checklist has been devised by the Government and is used by the Planning Casework Unit and the Planning Inspectorate when screening for EIA development. Whist there is no obligation to use it local planning authorities may find it a useful foundation for the screening process. In essence, it captures the contents of Schedule 3 in a manageable format. The following section is an appraisal of the proposed development in the context of the above Schedule 3 criteria and a completed copy of the checklist.

5. Appraisal of Schedule 3 Criteria

Introduction

5.1. This section provides an appraisal of the proposed development, considering Schedule 3 criteria of the EIA Regulations. First to be considered are the characteristics of the development; and secondly the location of the development.

CHARACTERISTICS OF DEVELOPMENT

Size of the development

5.2. The proposals are for the demolition of the existing houses and the construction of 488 co-living units and 100 dwellings with associated facilities, cycle parking, Blue Badge parking, landscaping and refuse storage on a site area of *circa* 11,535sqm.

Cumulative effects

5.3. In respect of EIA, the Planning Practice Guidance³ states that:

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.

5.4. The Council's online planning records have been interrogated and the following has been particularly considered in terms of site relevance and cumulative effect within this Screening stage. The wider area has been subject to much change over the years but for the purpose of this screening request, the following is considered pertinent for consideration.

Table 1 – Existing/approved	development for cumula	ative considerations on-site
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Reference & address	Description	Decision & date
20/0967 Wembley Park Station	The comprehensive mixed-use redevelopment of the site comprising the phased demolition of the existing buildings and structures on site and the phased development comprising site preparation works, provision of five new buildings containing residential uses, replacement train crew accommodation and flexible retail floorspace, basement, private and communal amenity space, associated car parking (including the part re-provision of	Permission granted 22-Feb-22

³ Environmental Impact Assessment - GOV.UK (www.gov.uk)

Reference & address	Description	Decision & date
	station car parking), cycle parking, access and servicing arrangements, refuse storage, plant and other associated works.	

5.5. The following pages contain the completed EIA checklist.

Table 2: Completed EIA Checklist

Question Natural resources	Briefly explain answer and, if applicable and/or known, include name of feature and proximity to site (If answer is 'No', the answer to next column is 'N/A')		Is a significant effect likely, having regard particularly to the magnitude and spatial extent (including population size affected), nature, intensity and complexity, probability, expected onset, duration, frequency and reversibility of the impact and the possibility to effectively reduce the impact? If the finding of no significant effect is reliant on specific features or measures of the project envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment these should be identified in bold.		
Will construction, operation or decommissioning of the project involve actions which will cause physical changes in the topography of the area?	Yes	Some minor changes to topography will be required to facilitate the proposed building levels, access and egress.	No	As the embankment is an EA maintained flood defence, it is unlikely that any significant changes in topography will be undertaken.	
Will construction or operation of the project use natural resources above or below ground such as land, soil, water, materials/minerals or energy which are non-renewable or in short supply?	Yes	The proposals would use land, materials and energy in the construction process.	No	The proposals will be for the redevelopment of previously developed land, which will include the use of materials during construction but the effect will not be significant.	
Are there any areas on/around the location which contain important, high quality or scarce resources which could be affected by the project, e.g. forestry, agriculture, water/coastal, fisheries, minerals?	No	None such exist.	N/A		

Waste						
Will the project produce solid wastes during construction or operation or decommissioning?	Yes	There will be waste as a result of the construction, operation and decommissioning phases.	No	It is unlikely to be significant and akin to those normally associated with such an urban development. The depositing of the waste could be recycled where appropriate and disposed of at a licensed site. The implementation of waste reduction can be secured via a CEMP and in the operation phase, the mechanism could be a SWMP. These mitigation measures, if required, would ensure no significant impacts.		
Pollution and nuisances						
Will the project release pollutants or any hazardous, toxic or noxious substances to air?	No	This is unlikely due to the nature of the proposals. An Air Quality Assessment as part of the planning application will properly assess the potential impacts at construction and operational stages. Any requisite mitigation at the construction phase can be embedded in the CEMP. In terms of the operation phase, other than Blue Badge parking, the development will be car free.	N/A			
Will the project cause noise and vibration or release of light, heat, energy or electromagnetic radiation?	Yes	There will understandably be limited construction noise and vibration.	No	There would be a limited amount of noise during construction but not to the extent of being harmful. The effect would be short term, localised, not significant and in an area where there are not any sensitive receptors. This would be properly controlled by a construction management plan, if required and reasonable. Therefore, any impact will be unlikely to be		

				significant and properly controlled by other mechanisms to EIA.
Will the project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?	Yes	Given the proximity of the brook and that there will be construction processes, there is an increased risk from the status quo.	No	The construction management plan, which will be likely controlled by the LPA by way of a planning condition, will detail the mechanisms to be put in place in addition to requisite construction practices as appropriate mitigation so that there will not be a likely significant risk.
Are there any areas on or around the location which are already subject to pollution or environmental damage, e.g. where existing legal environmental standards are exceeded, which could be affected by the project?	Yes	Yes, the site as with this entire borough is within an AQMA.	No	It is not considered that the proposals will further contribute to the AQMA and a CTMP can include certain measures to ensure that – as a planning condition.
Population and human health				
Will there be any risk of major accidents (including those caused by climate change, in accordance with scientific knowledge) during construction, operation or decommissioning?	No	None.	N/A	
Will the project present a risk to the population (having regard to population density) and their human health during construction, operation or decommissioning? (for example due to water contamination or air pollution)	Yes	There is always a risk associated with construction but it would be low given the nature and scale of the development. The developer would need to work within the requirements of health and safety regulations and follow the considerate contractor's scheme. In addition, there would not be an introduction of higher risks that could affect human health as a result of the development.	No	A Construction Traffic/Environmental Management Plan (CT/EMP) can be secured by a suitably worded planning condition as the proper and proportional mechanism for control. This will include a range of specific measures to manage the delivery of materials to/from the site. This will ensure that impacts are not significant.

Water resources						
Are there any water resources including surface waters, e.g. rivers, lakes/ponds, coastal or underground waters on or around the location which could be affected by the project, particularly in terms of their volume and flood risk?	Yes	The adjacent brook could in theory be affected. However, the flood risk assessment will assess and identify any requisite mitigation such as designed-in including surface water drainage and sewerage.	No	The nature of development will not give rise to any significant effect on the existing water course. A FRA will be part of the planning application. Suitably worded planning conditions are the most appropriate and robust form of control, as necessary.		
Biodiversity (species and habitat)						
Are there any protected areas which are designated or classified for their terrestrial, avian and marine ecological value, or any non-designated / non-classified areas which are important or sensitive for reasons of their terrestrial, avian and marine ecological value, located on or around the location and which could be affected by the project? (e.g. wetlands, watercourses or other water-bodies, the coastal zone, mountains, forests or woodlands, undesignated nature reserves or parks. (Where designated indicate level of designation (international, national, regional or local)).	No	The Brent Reservoir SSSI is some 1.8km from the site and given the intervening urban context, it is not considered that this will be affected by these proposals.	N/A			
Could any protected, important or sensitive species of flora or fauna which use areas on or around the site, e.g. for breeding, nesting, foraging, resting, overwintering, or migration, be affected by the project?	Yes	Whilst this is a highly urbanized area, the proximity of the brook and its banks could be accommodate species. Whether these are sensitive or important, will be established by an ecological survey at the planning application stage.	No	The finding of the ecological survey/reporting will incorporate any requisite ecological mitigation, which is the proportional mechanism not EIA and will fully inform the proposals that will form the planning application.		

Landscape and visual						
Are there any areas or features on or around the location which are protected for their landscape and scenic value, and/or any non-designated / non-classified areas or features of high landscape or scenic value on or around the location which could be affected by the project? Where designated indicate level of designation (international, national, regional or local).	No	There are no such features/areas.	N/A			
Is the project in a location where it is likely to be highly visible to many people? (If so, from where, what direction, and what distance?)	Yes	The site is in an urban environment so highly visible. However, the context is key and within this borough it is within a highly developed area i.e. that is the context. Cranes will be a likely construction feature but these will be temporary. Hoarding will also minimise construction views.	No	The urban context is key – whilst visible as is arguably most development, it will be not be significant in terms of the EIA Regulations.		
Cultural heritage/archaeology						
Are there any areas or features which are protected for their cultural heritage or archaeological value, or any nondesignated / classified areas and/or features of cultural heritage or archaeological importance on or around the location which could be affected by the project (including potential impacts on setting, and views to, from and within)? Where designated indicate level	No	No, as previously stated, the nearest heritage features are some 0.5km from the site with intervening townscape and therefore it is not considered that these could be affected by the project including views to/from/within and the settings.	N/A			

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of designation (international, national, regional or local).					
Transport and access					
Are there any routes on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the project?	No	None.	N/A		
Are there any transport routes on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the project?	No	None	N/A		
Land use					
Are there existing land uses or community facilities on or around the location which could be affected by the project? E.g. housing, densely populated areas, industry / commerce, farm/agricultural holdings, forestry, tourism, mining, quarrying, facilities relating to health, education, places of worship, leisure /sports / recreation.	Yes	Given the surrounding land uses – particularly housing in the construction phase - it is not possible to say that these will not be affected by the proposals.	No	The additional dwellings and co-living units will be supportive to the existing uses yet not with a likely significant impact.	
Are there any plans for future land uses on or around the location which could be affected by the project?	No	Not aware of.	N/A		
Land stability and climate					

Is the location susceptible to earthquakes, subsidence, landslides, erosion, or extreme /adverse climatic conditions, e.g. temperature inversions, fogs, severe winds, which could cause the project to present environmental problems? Cumulative effects	No	None.	N/A	
Could this project together with existing and/or approved development result in cumulation of impacts together during the construction/operation phase?	No	As confirmed in paragraph 5.3, each application should be based on its own merits although there may be occasions where it is necessary to consider existing or approved developments. Construction processes can be properly controlled by Management Plans, precommencement planning conditions and coordination with other developments. In this instance given the existing/approved visual context, the proposed built form of development will be visually absorbed. Whilst the proposals will be visible and there is no attempt to 'hide' the proposals, the context is such that cumulatively there will not be significant impacts as a result of this additional development to warrant an EIA.	N/A	
Transboundary effects				
Is the project likely to lead to transboundary effects? ⁴	No	See footnote.	N/A	

⁴ The Regulations require consideration of the transboundary nature of the impact. Due to the England's geographical location the vast majority of TCPA cases are unlikely to result in transboundary impacts.

Types and Characteristics of the Potential Impact

- 5.7 Finally, Schedule 3 is to consider the likely significant effects of the development on the environment in relation to the criteria set out in paragraphs 1 and 2 of that Schedule, namely the characteristics and location of development taking account of the following:
 - (a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);
 - (b) the nature of the impact;
 - (c) the transboundary nature of the impact;
 - (d) the intensity and complexity of the impact;
 - (e) the probability of the impact;
 - (f) the expected onset, duration, frequency and reversibility of the impact;
 - (g) the cumulation of the impact with the impact of other existing and/or approved development;
 - (h) the possibility of effectively reducing the impact.

However, none of the criteria identified in the completed checklist are considered to have significant effects as a result of the proposed development. Consequently, there is no requirement to further assess in the context of Schedule 3.

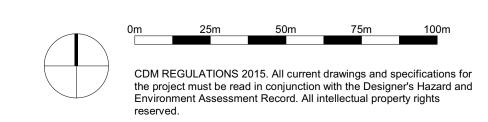
6. Conclusions

- 6.1. In accordance with the EIA Regulations, this Screening Request has taken account of the proposed development, its location and the sensitivity of the existing environment. Whilst the site area exceeds the threshold(s) criterion(a) as an 'Urban Development Project' Part 10b of Schedule 2 the site is not within a Sensitive Area.
- 6.2. The over-riding determination for EIA is whether the proposed development is likely to result in likely **significant** effects on the environment. The site as already developed is not considered to be sensitive to new development and any environmental impacts are unlikely to be significant, complex or widespread.
- 6.3. In summary, potential environmental effects associated with traffic, air quality, noise, waste, pollution, flooding, ecology, visual and other physical changes resulting from the proposed development have been considered and are not expected to be significant with the standard project/construction mitigation where required.
- 6.4. Consequently, it is not considered that the proposals are EIA development but it is respectfully requested that Brent Council adopts a Screening Opinion in accordance with Regulation 6(6)(a) within three weeks from receipt of this Request or such longer period, not exceeding 90 days from that same date (Regulation 6(6)(b)) in respect of the proposed development.

LM/Oct-23

Appendix TPD1 Site Location Plan





Scale @ A1 1: 1250