AVISON YOUNG

Environmental Impact Assessment (EIA) Screening Report

Argenta House, the London Borough of Brent

November 2024

Contents

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For and on behalf of Avison Young (UK) Limited

1. Introduction

1.1 This Environmental Impact Assessment (EIA) Screening Report was prepared by Avison Young on behalf of Clarion Housing Group ('the Applicant') in support of a full planning application for a residential-led redevelopment project (the 'Development'). The Development is located within an area of land (the 'Site') bound to the north-east by a large area of surface car parking associated with the adjacent Wembley Point commercial building, the Old North Circular Road which provides access to the North Circular Road (the A406) to the south-east, Argenta Way to the south-west and Point Place to the north-west. The Site currently comprises an area of approximately 0.15 hectares (ha) and is located within Stonebridge Park, within the administrative area of the London Borough of Brent (LBB), north-west London.

1.2 This EIA Screening Report summarises the findings of the research and analysis undertaken by Avison Young and the Applicant's Consultant Team in relation to the prevailing environmental baseline conditions relevant to the Site and the potential for the Development to give rise to significant environmental effects. The purpose of this EIA Screening Report is to facilitate the LBB in making their decision on the need for EIA, or otherwise.

1.3 The conclusions of this EIA Screening Report are informed by:

- Desk-based study with regards the prevailing environmental conditions, features and attributes of the Site and its surrounds.
- Liaison with the Applicant's Consultant Team.
- Technical environmental reports prepared for a planning application (FUL/18/4847 as amended by planning application reference FUL/21/4642) for the Site as cited throughout this report.
- Technical environmental reports prepared for the planning applications for approved schemes in the area (namely Wembley point, Grand Union and Twyford Abbey) as cited throughout this report.
- Preliminary Tree Survey Schedule (2024), SJA Trees[1].

[1] SJA Trees, Preliminary Tree Survey Schedule, 2024.

2. Formal Request for an EIA Screening Opinion

2.1 Provisions for the request of an EIA Screening Opinion from LBB is made within Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)[2] (the 'EIA Regulations'). This states:

(1) "A person who is minded to carry out development may request the relevant planning authority to adopt a Screening Opinion.

(2) A person making a request for a screening opinion in relation to a development where an application for planning permission has been or is proposed to be submitted must provide the following:

(a) A plan sufficient to identify the land;

(b) A description of the development, including in particular:

(i) A description of the physical characteristics of the development and, where relevant, of demolition works;

(ii) A description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;

(c) A description of the aspects of the environment likely to be significantly affected by the development;

(d) To the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from:

(i) The expected residues and emissions and the production of waste, where relevant;

(ii) The use of natural resources, in particular soil, land, water and biodiversity; and

(e) Such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment."

2.2 With regards to the obligations of a Local Planning Authority (LPA), the EIA Regulations state within Regulation 6 that an EIA Screening Opinion should be adopted within three weeks of receiving a formal request for an EIA Screening Opinion. Furthermore, Regulations 5 (5) of the EIA Regulations state:

"Where a relevant planning authority adopts a screening opinion under regulation 6(6), or the Secretary of State makes a screening direction under regulation 7(5), the authority or the Secretary of State, as the case may be, must-

(a) State the main reasons for their conclusion with reference to the relevant criteria listed in Schedule 3;

[2] The Town and Country Planning (Environmental Impact Assessment) Regulations (England) (SI571/ 2017), DCLG, London.

(b) If it is determined that proposed development is not EIA development, state any features of the proposed development and measure envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment; and

(c) Send a copy of the opinion or direction to the person who proposes to carry out, or who has carried out, the development in question."

2.3 Accordingly, the Applicant requests that the LBB provides an EIA Screening Opinion with details of the reason for their decision within three weeks of receipt of this EIA Screening Report and its integral formal request for an EIA Screening Opinion.

3. Background

Overview of the Site

3.1 As set out within **Section 1**, the Site, is approximately 0.15 ha in area. It is bound to the north-east by a large area of surface car parking associated with the adjacent Wembley Point commercial building, the Old North Circular Road which provides access to the North Circular Road (the A406) to the south-east, Argenta Way to the south-west and Point Place to the north-west. The Site is located in Stonebridge Park, within the administrative area of the LBB, and within the ward of Tokyngton. The location of the Site is shown in **Figure 3.1**.

Figure 3.1: Satellite View of the Site and Surroundings

3.2 As demonstrated within **Figure 3.1**, the Site currently comprises a cleared area association with the implementation of planning application reference FUL/18/4847 as amended by planning application reference FUL/21/4642 (the 'Approved Development'). Prior to partial implementation of the Approved Development the Site comprised the former Argenta House which comprised a two-storey commercial building (Use Class B1), a small retail kiosk, a shipping container and a telecommunication mast.

3.3 The Site is bisected by Wembley Brook, a small body of water than runs east to west.

3.4 **Figure 3.1** also demonstrates that the Site is bound:

- To the north-east by a large area of surface car parking associated with the adjacent Wembley Point commercial building. Beyond, also to the north and east are the residential areas of Tokyington.
- To the south-east by the Old North Circular Road to the south-east. The Old North Circular Road leads to the North Circular Road (the A406) which provides transport links across north London from Chiswick in the west to Woolwich in the east.
- Argenta Way to the south-west, beyond which is Stonebridge Park London Overground and Underground Station.
- Point Place to the north-west.

3.5 The Site is located within the boundary of site allocation 24 (Wembley Point) which is part of the LBB's Site Specific Allocations (2011)[3] document. The Site is also allocated for redevelopment within the LBB Local Plan (Policy Map site BSSA6)[4] as a key location for residential use, with the *"…potential for affordable workspace, supporting community and cultural uses and small-scale retail"*.

Planning History

3.6 As previously noted, planning application reference 8/4847, as amended by planning application reference 21/4642 is referred to as the 'Approved Development'. The Approved Development comprised demolition of the former on-Site Argenta House and the construction of a 26-storey building comprising 141 homes, together with associated landscaping and ancillary works.

3.7 Planning conditions 16, 17, 18, 21A, 20, 26 and 27 pursuant to the Approved Development have been discharged. Whilst demolition and Site clearance pursuant to the Approved Development has occurred, due to a change in market conditions, the Applicant is not intending to build out the Approved Development.

[3] Brent Site Specific Allocations DPD (2011).
[4] Brent Local Plan (2019-2041). Available at: https://www.brent.gov.uk/planning-and-building-control/planning-policy-and-guidance/brent-local-plan

4. The Development

4.1 Whilst the design of the Development is not yet fixed and the final heights (AOD) of the buildings are yet to be confirmed, the information provided to Avison Young by the Applicant and their architects, Assael, in respect of the Development (and summarised here) is considered adequate to establish the potential for likely environmental effects to arise from the Development and to advise on EIA Screening matters.

Description of Development

4.2 Whilst the design of the Development is not yet fixed, the information provided to Avison Young by the Applicant in respect of the Development (and summarised here) is considered adequate to establish the likely environmental effects of the Development and to advise on EIA Screening matters.

4.3 The Development would comprise 180 residential dwellings (Use Class C3) comprising 100% affordable homes. These would be provided in a single building extending up to 30 storeys in height. There would also be balconies, roof terraces, cycle and bin store areas, a new electricity substation and new areas of public realm and landscaping.

4.4 The brook running through the Site would be reprofiled and naturalised with riverside planting to improve biodiversity. Landscaping, tree planting and biodiversity enhancements would also be provided throughout the new ground floor public realm areas of the Development. Incidental play space would be provided at ground floor and further play space provided within the building.

4.5 The Development would be car-free with three accessible parking spaces provided within the Site, most likely along Point Place. Servicing and deliveries would likely take place from Argenta Way.

4.6 The drainage strategy for the Development will incorporate sustainable urban drainage systems (SuDS) techniques and will be designed to cope with future climate scenarios.

4.7 In accordance with the London Plan, the Development would be net-zero carbon. The energy strategy comprises the use of electrically driven heat pumps and would not include any on-Site combustion plant.

The Works

4.8 The detailed programme of construction works (the 'Works') is still evolving. However, it is expected that the Works would start in late 2025 with enabling works. The main construction timescale is anticipated to be 127 weeks, with the year of completion and full occupation expected to be mid-2029.

4.9 During the Works good environmental management of the Site would be ensured through the implementation of a Construction Environmental Management Plan (CEMP) which would be secured by a planning condition.

4.10 The standard working hours for all construction activity would comply with those defined by the planning permission. It is anticipated that this would be 08:00 to 18:00, Mondays to Fridays, and 08:00 to 13:00 on Saturdays, with no construction activity on Sundays or Bank Holidays. No continuous 24-hour activities are envisaged.

5. The Environmental Context and Site Sensitivity

Predominant Existing Land Uses

5.1 As previously noted, pursuant to the Approved Development, the existing Site has been cleared and the former Argenta House demolished. Wembley Brook bisects the Site running east to west.

5.2 The predominant existing land uses surrounding the Site include:

- **To the north** - Point Place and Tokyngton residential area.
- **To the east** - A large surface car parking associated with the commercial building of Wembley Point lies directly north-east of the Site. Wembley Point is a 21-storey office block with associated car-parking. East of the Site is the North Circular Road (the A406) and further areas of Tokyngton residential area.
- **To the south** – The Old North Circular Road and the North Circular Road (the A406). Further to the south-west is Stonebridge Park Station and Argenta Way.
- **To the west** - Beyond Argenta Way to the west are the Bakerloo Underground railway lines and Overground railway lines.

Historic Land Uses

5.3 Based upon information contained within the aforementioned Geotechnical and Geoenvironmental Report undertaken by RSA Geotechnics, the earliest available map relevant to the Site dates to 1880. This showed the Site to be undeveloped in an area of open fields. The River Brent flowed immediately to the south of the Site, whilst Wembley Brook flowed immediately to the south-west.

5.4 By 1896, Brent Cottage was shown to be present approximately 10m to the north of the Site.

5.5 By 1914, the area surrounding the Site began to industrialise. Brent Cottage was demolished, and Wembley Brook and the River Brent were channelised to flow along their present day alignments.

5.6 Buildings are identifiable to the north-west of the Site on maps dating to 1956. These included the Building's Contractor Yard and Stowbridge Service Station, located approximately 100m north-east of the Site.

5.7 On maps from 1974, the former Argenta House is present in the centre of the Site. To the north-west of the former Argenta House is Station House which appears on the site of the former building contractors yard. By 1994, Point Place was constructed to the north-west of the Site and Station House was renamed Wembley Point. In around 2004 / 2005 a small single-storey building, being used as a newsagent kiosk, was built in the southern corner of the Site. In around 2005 / 2006 a phone mast was installed on the eastern corner of the Site. The Site and its surroundings remained unchanged until the demolition of the former Argenta House and the small kiosk building in 2024.

Transportation

5.8 The Site is located in an area with a Public Transport Accessibility Level (PTAL)[5] of 4 with 0 being the lowest, and 6b being the highest.

5.9 Prior to partial implementation of the Approved Development, vehicular access to the Site was afforded directly from Argenta Way. Argenta way is lined with pavement. Therefore, pedestrians could also ingress / egress via this route. However, at the current time, and owing to the partial implementation of the Approved Development, no public access is available to the Site.

5.10 Argenta Way connects the Site with the wider areas of London as it merges with the North Circular Road (the A406) via the Old North Circular Road. The Old North Circular Road is a dual carriageway that runs parallel to the North Circular Road (the A406). The Old North Circular Road is not considered a sensitive road link as it has no built frontage and is characterised by the various structures supporting road and rail crossings. The North Circular Road (the A406) is a ring road around Central London and runs from Chiswick in the west to Woolwich in the east via suburban North London. Point Place, a 'one way road' which bounds the western boundary of the Site, is connected to Argenta Way via a small roundabout in the south-west.

5.11 Background traffic flows relevant to the Site were obtained from the Department for Transport (DfT). There are two counts on its database which are in proximity to the Site. One is located on the North Circular Road (A406) and the other, along the Old North Circular Road. On the Old North Circular Road, the DfT database reports an Average Annual Daily Traffic (AADT) of 7,259 vehicles. The North Circular Road reports an AADT of 99,120.

5.12 The nearest station to the Site is Stonebridge Park, located immediately south of the Site. The station provides regular London Underground and Overground services along the Bakerloo line and Watford Direct Current (DC) line.

5.13 The nearest bus stops to the Site are the two stops that serve Stonebridge Park Station which provide three services to Ealing, Edgware and Turnham Green.

Air Quality

5.14 The LBB has declared an Air Quality Management Area (AQMA) across the whole borough for exceedances of the annual mean NO_2 and 24-hour mean PM_{10} (Particulate Matter measuring less than ten micrometres or less in diameter) objectives, due to emissions from road traffic.

5.15 The nearest NO_2 diffusion tube monitoring point, Pitfield Way (ID: BRT43), is located along the North Circular Road (the A406) approximately 600m to the north-west of the Site. This monitoring point has recorded that concentrations of NO_2 have consistently been decreasing with the annual average concentrations decreasing from 63.8 to 41.9 between 2019 and 2021.

[5] Transport for London WebCAT Planning Tool, Access Level (PTAL). Available at: https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat

5.16 The nearest continuous air quality monitoring station is located at Ikea Brent, approximately 1.5km to the north-west of the Site. It has recorded that ambient levels of NO_2, PM_{10} and $PM_{2.5}$ have all decreased to levels below the relevant Air Quality Objectives between 2016 and 2022[6].

Ecology and Nature Conservation

Designated Sites

5.17 A desk-based review of the Site and its environs using DEFRA's Magic Map[7] was carried out. This concluded that the Site is not designated (statutorily or non-statutorily) for any nature conservation value. In addition, the desk-based review did not identify any international sites within 10km of the Site or any national statutory sites within 2km of the Site.

5.18 Despite the above, there are 11 non-statutory Sites of Importance for Nature Conservation (SINCs) within 1km of the Site. The three closest being:

- Harlesden to Wembley Central Railside / Wembley Brook Grade I SINC, located approximately 20m north-west of the Site. This SINC provides habitat for reptiles, birds, mammals and insects. It also includes a section of the Wembley Brook with reedbed. The SINC is linked to the Site by the section of the Wembley Brook which runs through the Site (although the section of the Wembley Brook within the Site is not designated).

- Brent River Park Grade II SINC, located approximately 220m north-east of the Site. This SINC is a section of the river Brent which supports aquatic and terrestrial species.

- River Brent west of Stonebridge Grade II SINC, located approximately 340m south-west of the Site. This canalised section of the river Brent supports fennel pondweed, mature trees and ruderal vegetation which support birdlife.

Habitats and Protected Species

5.19 The Applicant's Ecologist (Greengage Environmental) undertook a Preliminary Ecological Assessment (PEA) of the Site on the 28th of August 2024. The recorded habitat features on the Site are shown in **Figure 5.1.**

5.20 **Figure 5.1** demonstrates that the Site comprises sparsely vegetated land, bramble scrub, and the 'other rivers and streams' in the form of Wembley Brook. Within the Site the Wembley Brook is an open concrete culvert. The channel is approximately 2m wide and the banks are approximately 1.5m high. The Wembley Brook within the Site comprised debris and showed evidence of some vegetation.

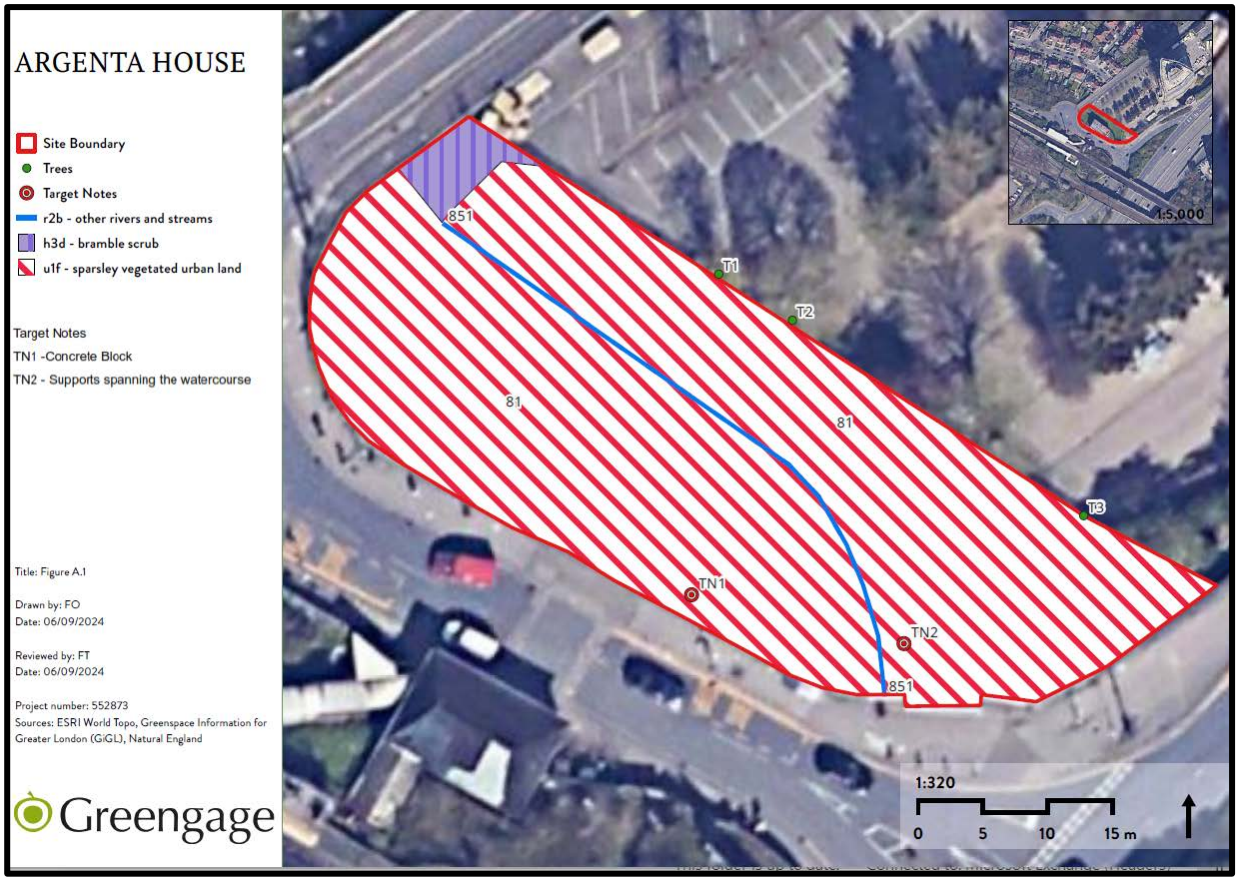
5.21 None of the habitats identified on the Site were considered to comprise habitats of principal importance (HPI). All habitats on the Site were considered to be of limited ecological importance, although the scrub may offer some limited nesting bird opportunities.

[6] London Borough of Brent Air Quality Monitoring and Reports, 2022. Available at: https://www.brent.gov.uk/environment/air-quality/air-quality-monitoring-data

[7] https://magic.defra.gov.uk/magicmap.aspx

5.22 Previous bat surveys were undertaken in 2018 and did not record any bat activity or emergence. Owing to the habitats present on the Site, there is no potential for roosting or hibernating bats on the Site.

Figure 5.1: On-Site Habitats (Source: Greengage)



Arboriculture

5.23 As can be seen in **Figure 5.1** there are no existing trees on Site. However, there are three trees present on the north-west border of the Site (an apple tree, a field maple and a Norway maple). A Preliminary Tree Survey[8] identified all three trees to be of low quality.

Townscape, Built Heritage and Visual Amenity

5.24 The Site is not located within any area designated in recognition of its landscape quality or value at either a statutory national level (Area of Outstanding Natural Beauty (AONB) or National Park), or at a non-statutory local level. However, the Site lies at a point of townscape significance within the local area. Its position close to a point where North Circular Road (the A406) bends to the south is such that it is prominent along the route, particularly from the section of the North Circular Road (the A406) to the north-east of the Site.

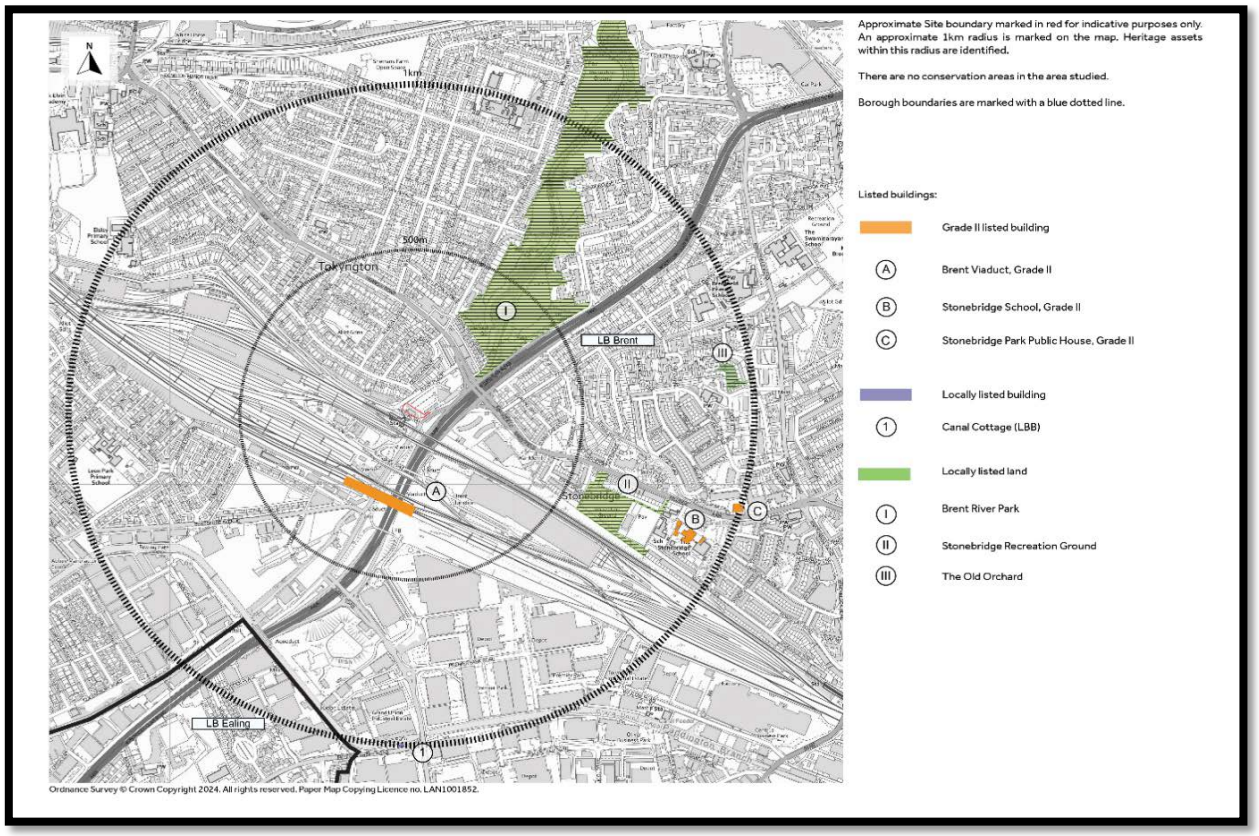
[8] SJA Trees, Preliminary Tree Survey, August 2024.

5.25 The townscape character of the Site and immediate area is dominated by the presence of the North Circular Road (the A406) which, like it, are either occupied by large scale buildings (former Unisys site) or are being developed as large scale residential-led development. The townscape character of the wider area around the Site is one largely occupied by low or medium scale residential development, mostly inter-war or post-war, but with considerable areas of modern development. Taller and larger built form towards Wembley Stadium (to the north) are visible from the Site. Brent River Park is a significant area of green open space in the local area, stretching for over 1km north of Harrow Road. The River Brent flows through the centre of the park, and the course of the river is lined by trees. Other parts of the park are more open, and views from it towards the south take in Wembley Point.

5.26 To the south east of the Site, south of the North Circular and railway lines of the London Overground is an area dominated by the Park Royal Industrial Estate. This area comprises low scale warehouses and distribution centres accommodating commercial and light industrial uses, as well as some retail uses. Most of the buildings are of poor visual quality, typically with profiled metal as a dominant elevational material, present largely blank frontages to streets and are set back behind car parks or strips of space. The overall character of the public realm is fragmented.

5.27 **Figure 5.2** presents the built heritage context. There are no World Heritage Sites or Registered Parks and Gardens within 500m of the Site. Similarly, there are no conservation areas within 1km of the centre of the Site with the closest being the Canalside Conservation Area within the London Borough of Ealing, located approximately 1.5km from the Site at its closest point.

Figure 5.4: Heritage Context Map (Source: The Townscape Consultancy)



5.28 There are three Listed Buildings within 1km of the Site. These are:

- The Grade II Listed Brent Viaduct located approximately 250m south-west of the Site.
- The Grade II Listed Stonebridge School located approximately 800m south-east of the Site.
- The Grade II Listed Stonebridge Park Public House located approximately 950m south-east of the Site.

5.29 No locally listed buildings were identified within the study area. Three locally listed land designations were identified within 1km of the Site, namely Brent River Park, Stonebridge Recreation Ground and The Old Orchard.

Archaeology

5.30 The Site is not located within, or near to an Archaeological Priority Area (APA).

Ground Conditions and Contamination

5.31 Based on British Geological Society (BGS) mapping[9], the Site's underlying bedrock geology is London Clay Formation - Clay, Silt and Sand.

5.32 The BGS mapping identifies superficial deposits of Kempton Park Gravel (Sand and Gravel) formation to overlay the bedrock geology. However, this is only on the eastern part of the Site.

5.33 The Site is not located within a Source Protection Zone (SPZ) or within a Coal Mining Reporting Area.

5.34 According to the UK Health Security Agency's (UKHSA) Radon Map[10], the Site is located within an area where it is believed that less than 1% of the properties within the area are affected by radon. This is below the range in which mandatory protection measures against the ingress of radon would be required.

5.35 Made ground was present in exploratory holes during an historic ground investigation[11]. The depth of made ground varied between 0.6m in the central northern area of the Site and 4.5m in the western area of the Site. The made ground was not fully penetrated due to obstructions including cobble size concrete fragments.

5.36 The historic land-uses of the Site suggest that the Site would not yield any major sources of contamination. However, as would be expected from such a typical urban brownfield location, there could the potential for occurrences of sub-surface and made ground heavy metals, Polycyclic aromatic hydrocarbons (PAHs) and Total Petroleum Hydrocarbons (TPHs).

5.37 Potential off-Site sources of contamination may arise from the former build contractor's yard located immediately to the northeast and Stonebridge Park station and associated railway lines located in proximity to the south-west of the Site.

[9] British Geological Survey Online Mapping (2024). Available at: https://www.bgs.ac.uk/map-viewers/geoindex-onshore/
[10] UK Health Security Agency – UKRadon (2024). Available at: https://www.ukradon.org/information/ukmaps
[11] RSA Geotechnics Ltd, Geotechnical and Geoenvironmental Interpretative Report, 2021.

Waste

5.38 The Site is not located on any permitted (current) or historic landfill sites. The nearest historic landfill site is located 327m to the south which stored domestic and gully waste.

5.39 As a currently vacant Site, no waste arisings are derived from the existing Site.

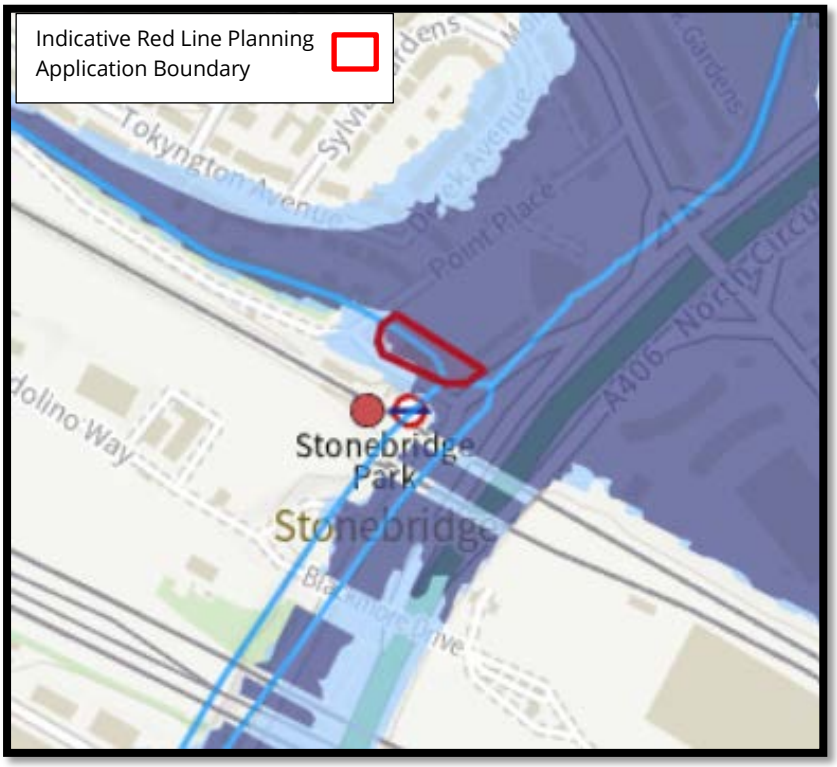
Water Resources, Flood Risk and Drainage

5.40 The Wembley Brook runs through the Site and joins the River Brent approximately 40m downstream of the south-east corner of the Site. Both watercourses are classified as Main River. Wembley Brook runs in a 'u' shaped concrete channel through the Site.

5.41 The existing surface water drainage associated with the Site discharges directly into Wembley Brook.

5.42 The Flood Map for planning (refer to **Figure 5.3**) shows the Site as being located predominantly within Flood Zone 3. This indicates that in any year, the Site has a 1% or more chance of flooding from rivers.

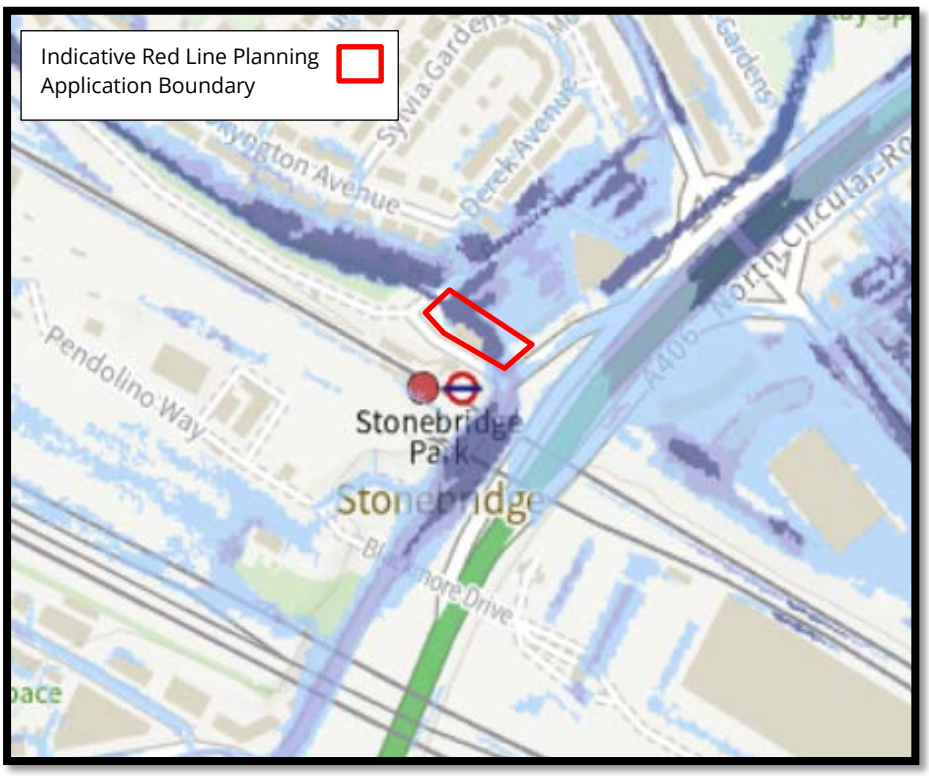
Figure 5.3: Flood Risk Map for Planning



5.43 As shown in **Figure 5.4**, the Site is also at High Risk from surface water flooding[12], indicating a more than 3.3% chance each year annual probability of surface water flooding. The area of the Site at risk is shown to follow the course of the Wembley Brook.

[12] GOV.UK (2024) Flood Maps. Available at: https://check-long-term-flood-risk.service.gov.uk/map

Figure 5.4: Surface Water Flood Risk



5.44 The Site is at risk of reservoir flooding in the event of failure of the existing reservoirs in the area. The reservoir that poses a flood risk to the Site is that of The Brent Reservoir (Welsh Harp) which is located approximately 2.7km north-east of the Site. It is considered that these reservoirs are operated and managed to a high standard and the risk of flooding to Brent or more specifically the Site therefore the likelihood of reservoir flooding is remote.

5.45 The risk of groundwater flooding is considered to be low across the Site as it is for the majority of the administrate boundary of the LBB. This is due to the thick London Clay geology which acts as an impermeable barrier to ground water below.

Risk of Major Accidents and Disasters

5.46 There are no establishments located within three miles of the Site that are covered by the Control of Major Accident Hazards (COMAH) Regulations 2015[13]. In addition, the currently vacant nature of the Site does not give rise to any likely risk of major accident or disaster.

Socioeconomics and Health

5.47 As previously noted within **Section 3**, The Site falls within the ward of Tokyngton within the administrative area of the LBB. The population of the ward of Tokyngton is 10,000 and the population of Brent is 339,816.

[13] Health and Safety Executive (2022) COMAH 2015 Public Information Search. Available at: https://notifications.hse.gov.uk/COMAH2015/Search.aspx

5.48 The Lower Super Output Area ('LSOA') which the Site falls within is ranked 13,624 out of 32,844 LSOAs in England, where 1 is the most deprived LSOA in the 2019 Indices of Multiple Deprivation. Within Brent, 5.3% of the population have no qualifications. Life expectancy in Brent is 62.86 and 68.6 years for men and women respectively, which is lower than the average for England of 79.3 and 83.1 years for men and women respectively.

5.49 There are five General Practitioners (GPs) within 2km of the Site. All of the GP's are accepting new patients. The nearest GP surgeries are:

- The Surgery, located approximately 920m north-west of the Site.
- Hilltop Medical Practice, located approximately 1km south-east of the Site.
- Brentfield Medical Centre, located approximately 1.3km north-east of the Site.
- Park Royal Medical Centre, located approximately 1.6km south-east of the Site.
- Eagle Eye Surgery, located approximately 1.7km north-west of the Site.

5.50 There are six primary schools within 1km of the Site. These include:

- Our Lady Lourdes Catholic Primary School, located approximately 780m east of the Site. The school has capacity for 21 pupils.
- Lyon Park Primary School, located approximately 800m west of the Site. The school has capacity for 13 pupils.
- The Stonebridge School, located approximately 850m east of the Site. The school has capacity for 363 pupils.
- Elsley Primary School, located approximately 870m north-west of the Site. The school has capacity for 26 pupils.
- Brentfield Primary School, located approximately 870m north-east of the Site. The school has capacity for 240 pupils.
- Oakington Manor Primary School, located approximately 920m north of the Site. The school has capacity for 59 pupils.

5.51 There are four secondary schools within 2km of the Site. These include:

- Ark Elvin Academy, located approximately 1.2km north-west of the Site. The school is over capacity by 112 pupils.
- Alperton Community School, located approximately 1.6km west of the Site. The school has capacity for 22 pupils.
- Michaela Community School, located approximately 2km north of the Site. The school has capacity for 117 pupils.

- North Brent School, located 2km north-east of the Site. The school has recently opened and information on capacity is not provided.

Sensitivity of the Site

5.52 With reference to all information provided within previous sections of **Section 5** of this EIA Screening Report, it can be demonstrated that the Site is not located within a 'sensitive area' as defined by the EIA Regulations; that is, a site within one or more of the following:

- A Site of Special Scientific Interest (SSSI).
- A National Park.
- Land subject to Nature Conservation Orders.
- A World Heritage Site (WHS).
- A Scheduled Monument (SM).
- A National Scenic Area.
- A Marine Protected Area; or
- A European site[14].

[14] As defined within Regulation 8 of The Conservation of Habitats and Species Regulations 2010 (SI490/2010)

6. EIA Screening Analysis

6.1 The following EIA Screening analysis follows the guidance published in the relevant Planning Practice Guidance (PPG)[15] , in addition to considering the requirements of Schedules 1, 2 and 3 of the EIA Regulations. The analysis is presented below.

Is the Proposal Schedule 1 Development?

6.2 The Development is not of a type that would constitute Schedule 1 development; that is development where full EIA is always required.

Is the Proposal Schedule 2 Development?

6.3 The Development is categorised under Schedule 2, Class 10 'Infrastructure Project' Subsection (b) 'Urban development projects'. For such development, an EIA *may* be required if:

- The development includes more than 1 ha of urban development which is not dwelling house development; or
- The development includes more than 150 dwellings; or
- The overall area of the development exceeds 5 hectares; or
- The development is located within a sensitive area as defined by the EIA Regulations.

6.4 As evidenced within **Section 5**, the Site is not located within a 'sensitive area' as defined by the EIA Regulations. However, the Development will contain 150 or more residential unit. As such, the Development is categorised as a 'Schedule 2' development. It is, therefore, necessary to consider the criteria as set out in Schedule 3 of the EIA Regulations to determine whether it would be likely for significant environmental effects to arise from the Development. The Applicant's request for an EIA Screening Opinion is therefore made on this basis. A consideration of Schedule 3 criteria is set out in the remaining sections of **Section 6** of this EIA Screening Report.

Consideration of Schedule 3 Criteria: The Likelihood of Significant Environmental Effects

Approach

6.5 In screening the Development, the factors set out in Schedule 3 of the EIA Regulations need to be carefully considered to determine whether significant environmental effects are likely. The relevant factors comprise:

- The characteristics of the Development (refer to **Section 4**) with particular regard to: (a) the size and design of the Development; (b) cumulation with other existing development and / or

[15] Planning Practice Guidance, Environmental Impact Assessment. Available at: https://www.gov.uk/guidance/environmental-impact-assessment

approved development; (c) the use of natural resources, in particular land, soil, water and biodiversity; (d) the production of waste; (e) pollution and nuisances; (f) the risk of major accidents and / or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge; and (g) the risks to human health (for example, due to water contamination or air pollution).

- The location of the Development (refer to **Section 3**) and the environmental sensitivity of the geographical areas likely to be affected by the Development (refer to **Section 5**).

- The types and characteristics of the potential environmental effects of the factors specified in Regulation 4(2) namely: (a) population and human health; (b) biodiversity; (c) land, soil, water, air and climate; (d) material assets, cultural heritage and the landscape; and (e) the interaction between the factors referred to in sub-paragraphs (a) to (d) (refer to the following sections of this **Section 6**).

Approved Development / Cumulative Schemes

6.6 As per the EIA Regulations, the potential for cumulative effects of the Development with other significant developments has considered "…*existing and / or approved development*." Given that existing development is already considered in the analysis of the existing environmental baseline conditions relevant to the Site (refer to **Section 5** and later sub-sections of **Section 6**) and a consideration of the likelihood of significant environmental effects of the Development are judged against this existing situation, for the purposes of this analysis, "…*approved development*…" is reasonably defined as projects with:

- A resolution to grant planning permission.

- A valid planning permission and yet to start on-site.

- A valid planning permission and under construction.

6.7 The above criteria afford a level of certainty with regards the likelihood for significant cumulative environmental effects to arise in combination with the Development. In addition, given the Site's environmental context, and the scale and nature of the Development, the potential for 'approved development' to give rise to potentially significant cumulative effects with the Development is reasonably limited to 'approved development' which is either Schedule 1 or Schedule 2 EIA development and which is located within 1 km (there of there abouts) of the Site. Such 'approved development' is subsequently referred to as 'Cumulative Schemes'.

6.8 A review of the LBB[16] and the London Borough of Ealing (LBE)[17] planning portals identified three relevant Cumulative Schemes. These are presented in **Figure 6.1** and **Table 6.1**.

[16] Brent Council (2024) Online Planning Portal. Available at: https://pa.brent.gov.uk/online-applications/search.do?action=advanced&searchType=Application&_ga=2.30537337.73950107.1724065427-1494935293.1723538820

[17] Ealing Council (2024) Online Planning Portal. Available at: https://pam.ealing.gov.uk/online-applications/

Figure 6.1: Map of the Cumulative Schemes

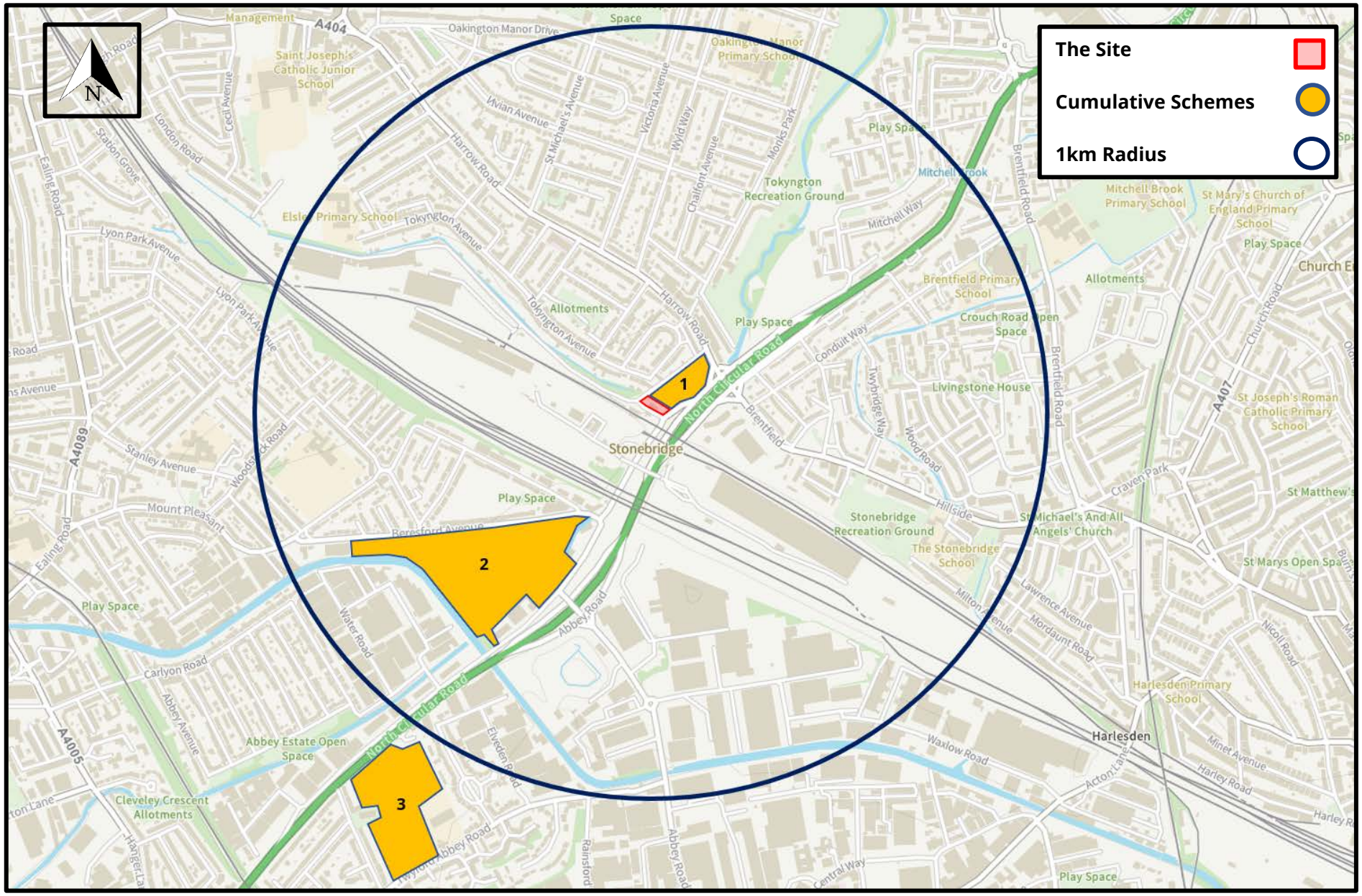


Table 6.1: Cumulative Scheme Information

Ref. (Fig 6.1)	Planning Application Reference	Address	Description	Status
London Borough of Brent				
1	Stonebridge Place (Wembley Point Car Park) **22/0784**	Wembley Point, Wem Tower, 1 Harrow Road and 5-15 Harrow Road, Wembley, HA9 (Adjacent to the north-eastern boundary)	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. 515 residential units. Building A: 32-Storeys, 111.95m AOD. Building B: 3-storeys, 16.8m AOD. Building C: Up to 20-Storeys, 66.45m AOD.	Approved 01/03/24 Not yet under Construction.
2	Grand Union **18/0321** Phase 1 (Plots A, B, C and D approved in detail Phases 2 to 6 approved in outline	Land Former 17 Northfields, Beresford Avenue, Wembley, HA0 1NW (approximately 335m south-west of the Site)	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 400 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.	Approved 28/09/18 Under construction/Ground enabling works

Ref. (Fig 6.1)	Planning Application Reference	Address	Description	Status
-	Grand Union **20/2784** Phases 3-7	-	**19/0465** Non-material amendment - Increase of residential unit total. Increase of B1a/B1c/B2/B8 floorspace. Amended parameter plans. **19/2732** Minor-material amendment - Increase in the proposed parameter height for Plot E **19/3391** Phasing Plan for phases consented in Outline **20/0106** Non-material amendment - amendments to the building heights, elevations, basement, internal layouts and mix of private homes in Phase 1 (Plots A-D) **21/1820** Increase in the proposed parameter height for Plot E to a maximum between 86.60m AOD and 92.90m AOD Reserved Matters permissions granted for layout, scale, appearance, access and landscaping for: **19/0925** Phase 3 Plot N **19/3674** Phase 2 (Blocks E-F) Hybrid planning application comprising: Outline planning permission for the demolition of existing buildings and structures on the site, all site preparation works and redevelopment to provide new buildings to accommodate new homes (Use Class C3), flexible commercial uses, new basement level, associated 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 with all matters reserved - appearance, access, landscaping, layout and scale. Detailed planning permission for Phase 3 (Buildings G, H and J) for the demolition of existing buildings and structures, all site preparation and infrastructure works and the development of new homes (Use Class C3) and flexible commercial floorspace; together with new basement level, 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. Permission subject to a Deed of Agreement dated 11 June 2021 under Section 106 of the Town and Country Planning Act 1990, as amended. ***Note: Application reference 20/2784 supersedes and replaces the approved Phase 3, 4, 5 and 6 of application reference 18/0321. The overall Approved Grand Union Cumulative Scheme therefore comprises the sum of Phase 1 and Phase 2 of application reference 18/0321, application reference 19/3674 and application reference 20/2784. This would give rise to up to 924 new homes.***	Approved 15/06/21

Ref. (Fig 6.1)	Planning Application Reference	Address	Description	Status
London Borough of Ealing				
3	Twyford Abbey **222341FUL**	Twyford Abbey Nursing Home Twyford Abbey Road Park Royal London NW10 7DP (approximately 1km south-west)	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.	Approved 09/02/23 Not yet under construction.

6.9 The Development was appraised, giving regard to all of the above factors as listed in Schedule 3 of the EIA Regulations, together with the information provided within **Sections 2 to 5** of this EIA Screening Report. The results and conclusions of this appraisal is presented below. For each environmental topic area considered, environmental effects are considered for the following.

- The construction of the Development (The Works).
- The Development once completed and operational (the Completed Development).
- The Development in combination with the Cumulative Schemes (the Cumulative Scenario).

6.10 Where environmental information for the Cumulative Schemes is available in the public domain, this was taken into account in the appraisal provided below. Where information was not available, assumptions were made, and these are clearly outlined in the appraisal below.

Transportation

The Works

6.11 Inevitably the Works will give rise to some disruption to the normal operation and functioning of the local road network. However, the Works will be rigorously planned and programmed to minimise disruption and allow for continued access to surrounding land uses. In this respect a Construction Logistics Plan (CLP) (to be secured through an appropriate planning condition) would set out all traffic and transport related management methods and controls to ensure minimal disruption to the local road network. Designated vehicular access and egress to the Site would be stipulated and vehicular traffic arising from construction site deliveries and pick-ups would follow pre-agreed designated routes and be timed to avoid peak traffic hours. Accordingly, while the Works may temporarily increase vehicular traffic generation associated with the Site, the traffic increase is not envisaged to give rise to significant effects.

6.12 Similarly, the CLP would also deal with the appropriate management of the pedestrian realm surrounding the Site. For example, should any public footway closures be required, these would be clearly advertised. Additional signposting would be erected to inform and guide pedestrians to nearby alternative routes. It therefore follows that temporary pedestrian realm disruptions and diversions would be managed so as to avoid significant effects.

6.13 In view of the above, the Works are not anticipated to generate significant effects on road users or pedestrians.

The Completed Development

6.14 With the exception of a maximum of three car-parking spaces for the mobility impaired, the Development is proposed to be a car-free.

6.15 In addition to the above, it is expected that the Applicant will contribute towards funding the extension of the LBB's existing Wembley Stadium Even Day Parking Permit Scheme to a full-time operation Resident Permit Parking Scheme. This would mean that once the Development is fully completed and

operational, there would be no opportunity for on-street car-parking. Accordingly, vehicular trips to the Site would be actively discouraged and anticipated to be extremely low.

6.16 The Guidelines for the Environmental Assessment of Traffic and Movement[18] (the 'IEMA Guidelines') set out a threshold of +/- 30% change in traffic flows to judge whether a traffic effect is likely to be 'significant, reduced to +/-10%' in sensitive locations.

6.17 The Applicant's Transport Consultants (TTP Consulting) have utilised the TRICS database to calculate the likely vehicular trip generation associated with completed and operational Development. The results concluded that the Development would generate an additional 105 AADT vehicular movements.

6.18 Due to the one-way nature of the roads surrounding the Site, it was assumed that 100% of vehicular traffic associated with the completed and operational Development (105 vehicle movements) would pass along the Old North Circular Road. When compared to existing vehicular traffic levels on the Old North Circular Road (7,259 AADT, refer to **Section 5**) this would represent a change of 2.9% based on the DfT's reported data for total vehicles. As this is substantially below the IEMA Guidelines thresholds for non-sensitive locations, it is highly unlikely that the Development would generate significant environmental effects resulting from traffic, once completed and operational.

6.19 A Transport Assessment and Travel Plan will be produced and submitted as part of the planning application and will set out the intended measures to encourage Site users to travel using more sustainable forms of transportation such as public transportation, cycling or walking.

6.20 In view of the above, the completed and operational Development is not anticipated to generate significant environmental effects in regard to Transportation.

Cumulative Scenario

6.21 Should the Works overlap with the construction programmes of the Cumulative Schemes there may be a potential for cumulative construction traffic effects to occur. However, as for the Development, it is assumed the construction activities of the Cumulative Schemes would be effectively managed through respective CLPs and Construction Environmental Management Plans (CEMPs). This would ensure minimal disruption to the surrounding road network.

6.22 Once completed, all three Cumulative Schemes would increase vehicular traffic movements on the on the Old North Circular Road.

6.23 With reference to the Environmental Statement (ES)[19] submitted in support of the Wembley Point planning application (planning application reference 22/0784) the estimated traffic arising from the Wembley Point Cumulative Scheme is expected to add 419 daily two-way vehicle flow to Point Place and Argenta Way. The total of 419 daily two-way vehicle flow would be a one-way flow (south-bound on Point Place and east-bound on Argenta Way) and all would turn on to Old North Circular Road, with an estimated 50/50 north-south distribution. This would result in one-way traffic increase of 210 daily two-way vehicle flow on the Old North Circular Road.

[18] IEMA. IEMA Guidelines for Environmental Assessment of Traffic and Movement. 2023.
[19] RPS, Wembley Point Environmental Statement: Volume 1, 2022.

6.24 According to the ES[20] submitted for the Grand Union Cumulative Scheme (planning application reference 20/2784), this Cumulative Scheme is expected to result in an increase of light vehicular traffic on Old North Circular Road by 389 AAWT vehicles but reduce Heavy Goods Vehicle (HGV) flows by 144 AAWT vehicles (due to the removal of the industrial estate uses). This would result in a total increase of 389 AAWT vehicles along the Old North Circular Road.

6.25 Due to its distance from the Site, not all the traffic resulting from the Twyford Abbey Cumulative Scheme (planning application reference 222341FUL) is anticipated to pass through the Development's local road network. Analysis from the Twyford Abbey Travel Plan[21] suggests that 20% of the increased traffic would pass along the Old North Circular Road. Hence, the Twyford Abbey project is expected to add 20 two-way daily vehicles to the Old North Circular Road.

6.26 Considering all of the above, the additional vehicular traffic generated by the Development and the three Cumulative Schemes on the Old North Circular Road together would amount to a total of approximately 724 vehicles AADT. In the context of the existing 7,259 vehicles AADT on Old North Circular Road, the additional vehicles would represent an increase of 9.97%. As this is substantially below the IEMA Guidelines thresholds for non-sensitive locations, it is highly unlikely that significant cumulative environmental effects resulting from traffic generation once the Development and Cumulative Schemes are completed and operational.

Air Quality

The Works

6.27 The Works could have the potential to give rise to the following air quality effects:

- Dust emissions and associated nuisance generated by construction activities.
- Additional emissions to the atmosphere from the operation of construction plant and machinery and construction related traffic generation.

6.28 However, the above types of effects tend to be highly localised and it should be noted that there are a limited number of sensitive receptors in the vicinity of the Site, namely, the residential properties located on Tokyngton Avenue and Derek Avenue to the north-west, north and north-east of the Site. Furthermore, with reference to **Section 5** there are no relevant ecological receptors within or in proximity to the Site that could be susceptible to these types of highly localised effects,

6.29 Despite the above, the potential temporary impacts of the Works to local air quality are expected to be mitigated via standard measures outlined within a CEMP (to be secured through an appropriate planning condition). These measures would most likely include the use of Site hoarding, wheel washing and damping highways and ground surfaces during prolonged dry periods, covering stockpiled materials, and monitoring and actively managing dust generating activities of the Works. These measures and the temporary nature of the Works are typically sufficient to minimise dust nuisance effects so that no significant effects are considered likely.

[20] Quod, Grand Union Masterplan, Environmental Statement Volume 1, 2020.
[21] Velocity, Twyford Abbey Transport Assessment Note Addendum, 2022.

6.30 Temporary emissions from on-Site construction plant and machinery and construction traffic contribute only a very small proportion of air pollution. Furthermore, it is expected that all construction traffic would access and egress the Site to / from the Old North Circular Road. This is located away from existing sensitive receptors. Emissions from these sources to the atmosphere are, therefore, also not anticipated to be significant.

6.31 In view of the above, the Works are not anticipated to generate significant effects to ambient air quality and / or any sensitive receptors.

The Completed Development

6.32 With reference to the air quality assessment[22] undertaken for the Approved Development, this concluded that the completed and operational Approved Development would not give rise to any significant air quality impacts and resultant effects and that the Site would be suitable for residential units from an air quality perspective. This assessment assumed the operation of Combined Heat and Power (CHP) plant and was undertaken at a time when the existing ambient air quality was worse that it currently is.

6.33 With reference to **Section 4**, the Development does not propose the use of any CHP plant. Instead, the Energy Strategy for the Development comprises electrically driven heat pumps. This would mean that the Development would give rise to less building plant derived emissions to air quality when compared to those of the Approved Development.

6.34 With reference to **Section 5**, although the Site is located within an AQMA, evidence demonstrates that local air quality in the vicinity of the Site is improving. Critically, annual mean NO_2 concentrations have decreased in proximity to the Site, with no exceedances of the NO_2 annual mean concentration objective (40 µg m^3).

6.35 With reference to **Section 6 (Transportation)**, the net increase of vehicular traffic associated with the completed and operational Development is expected to be 105 AADT vehicles. According to the Institute of Air Quality Management (IAQM) Guidance[23] this could be above the threshold for requiring detailed air quality modelling within an AQMA. However, as set out above, air quality trends within the LBB and in the vicinity of the Site have decreased and are below the 90% of the annual mean NO_2 and PM_{10}. Where this is the case, IAQM Guidance suggests that a higher threshold can be applied to determine whether significant air quality impacts and effects would result. This higher screening threshold suggests up to a net increase of 500 motorised trips per day would be the threshold for detailed assessment. This threshold is far in-excess of the anticipated additional 105 vehicles associated with the completed and operational Development. It is therefore considered that traffic generated by the completed and operational Development would not give rise to any significant air quality impacts or effects.

6.36 Considering all factors above, and particularly the results of the Approved Development air quality assessment which reflected the operation of combustible sources of heat and power and a likely worse air quality baseline position, the completed and operational Development is not considered to give rise to significant air quality impacts and effects.

[22] Epal, Argenta House Air Quality Assessment, 2018.
[23] IAQM Air Quality Planning Guidance, 2017 Available at: https://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf

Cumulative Scenario

6.37 Should the Works overlap with the construction programmes of all of the Cumulative Schemes, there may be a potential for cumulative construction dust nuisance effects to occur. However, as for the Development, it is assumed the construction activities of the Cumulative Schemes will be effectively managed by a CEMP. This would reduce disruption to the surrounding sensitive receptors so that significant effects are less likely.

6.38 As detailed previously in **Section 6 (Transportation)**, there will be a limited amount of vehicular traffic generated by the Cumulative Schemes. The total number of vehicles along the Old North Circular Road generated by the Development and Cumulative Schemes together would be approximately 724 AADT. Although this is above the threshold cited by IEMA as a level of daily motorised trips triggering the need for detailed air quality assessment, it is not considered likely that an assessment would predict that significant cumulative effects would arise. This is because:

- Local air quality in the vicinity of the Site is good, with no recent exceedances of the NO_2 annual mean concentration objective (40 µg m^3) observed, and air quality is anticipated to continue to improve with time.
- No significant cumulative effects were identified as part of the Air Quality Assessment undertaken for the Approved Development[24].
- No significant cumulative effects were identified as part of the assessments undertaken for the Cumulative Schemes and reported in respective ESs.

6.39 To demonstrate this, and to accord with planning policy requirements, an Air Quality Assessment and Air Quality Neutral Assessment will be undertaken and submitted in support of the planning application.

Noise

The Works

6.40 During construction of the Development, there would likely be a short-term, temporary increase in noise levels as a result of the operation of construction plant, equipment and delivery vehicle movements. These temporary, short-term effects would be typical of any construction project and may lead to some localised disturbance residential properties in proximity to the Site. However, such impacts and effects could be effectively managed via compliance with relevant standard sectorial legislative requirements and the implementation of standard sectorial environmental management control measures detailed within a CEMP (which can be secured by planning condition).

6.41 In view of the above, the Works are not anticipated to generate significant noise impacts or effects.

The Completed Development

6.42 With reference to **Section 6 (Transportation)** the completed and operational Development would generate an additional 105 AADT traffic flow (a 2.9% increase) on the Old North Circular Road. The

[24] Epal, Argenta House Air Quality Assessment, 2018.

IEMA Guidelines[25] states that a 25% increase or 20% decrease in traffic flows is required to give rise to only a 1 dB (audible) change in ambient noise, with a 3 dB change indicating likely significant effects. Accordingly, the completed and operational Development is not anticipated to give rise to any significant road traffic noise impacts or effects.

6.43 With regard to potential noise emanating from the operation of building plant, the design of the Development would be informed by noise emission limits set in accordance with British Standard 4142[26] and the relevant planning policies of the LBB. This would ensure that noise from the operation of building plant would not give rise to undue noise disturbance or intrusion. An environmental noise assessment is being undertaken to identify suitable noise limits for fixed plant and a report will be submitted alongside the planning application. The requirement to specify building plant that adhere to these noise limits can be secured by an appropriately worded planning condition.

6.44 The environmental noise assessment will also include the consideration of the suitability of the Site for residential development, taking account of nearby off-Site noise sources such as local traffic and railway noise and patron noise from the Ace Café. Recommendations for noise mitigation will be made to inform the design of the Development, where required. Measures will follow 'good acoustic design' principles and include acoustic screening, glazing and alternative means of ventilation, as appropriate.

6.45 In view of the above, the operation of the completed Development is not anticipated to generate significant noise impacts and effects.

Cumulative Scenario

6.46 Should the Works overlap with the construction programmes of the Cumulative Schemes, there may be a potential for cumulative construction noise effects to occur. However, as for the Development, it is assumed the construction activities of the Cumulative Schemes would be effectively managed by respective CEMPs.

6.47 With reference to **Section 6 (Transportation)** the completed and operational Development and Cumulative Schemes would generate an additional 724 AADT vehicular trips. This 9.97% change to existing traffic flows on the Old North Circular Road falls way below the +25% or -20% threshold required to give rise to a 1 dB (audible) change in ambient noise. Accordingly, the completed and operational Development and the Cumulative Schemes in combination are not anticipated to give rise to any significant road traffic noise impacts or effects.

6.48 Similar to the Development, all Cumulative Schemes would need to design, select, locate and / or attenuate all building services plant such that the relevant noise emission limits are achieved.

6.49 In consideration of the above, it is unlikely that there would be any significant cumulative noise impacts or effects.

[25] IEMA. IEMA Guidelines for Environmental Assessment of Traffic and Movement. 2023.
[26] British Standard 4142:2014+A1:2019 Methods for Rating and Assessing Industrial and Commercial Sound. 2019.

Ecology and Nature Conservation

The Works

Designations

6.50 There are no statutory or non statutory designated sites on the site. Those in the surrounding area, these are generally separated from the Site by intervening urban areas with no ecological connectivity between the Site and these sites.

Habitats and Protected / Notable Species

6.51 Habitats within the Site are considered to be of limited ecological value. All of the Site was assessed for protected species such as bats and birds and the habitats onsite were assessed for other flora, mammals, reptiles, amphibians and invertebrates. The Site walkover identified low potential for nesting birds and low potential for foraging / commuting bats. As the off-Site culverts could not be accessed for health and safety reasons a default moderate potential for roosting and hibernating bats has been assumed for these features. It is considered that there is negligible potential for all other protected species on Site.

6.52 There is moderate potential for bat activity and emergence off-Site due to the culverts associated with Wembley Brook. However, as the proposals do not include any works to these culverted sections and they are located outside of the Site, no further surveys are recommended. During the Works, the wider Site will be overseen by an Ecological Clerk of Works to ensure no significant effects occur.

6.53 As there is potential for breeding birds to be present onsite and all birds within the UK are protected by the Wildlife and Countryside Act 1981 (as amended)[27] whilst nesting, any further vegetation clearance will be done in line with best practice and standard mitigatory precautions would be implemented. This would include timing the Works outside of the nesting bird season, or where this is not possible, a pre-clearance nesting bird check would be completed by a suitably experienced ecologist. It is envisaged such precautions would form part of the preparatory works required to implement the Development and these will be managed during construction through the implementation of a CEMP.

6.54 The above measures would be set out within the CEMP, which will include best practice environmental management controls during the Works. This will also include measures to reduce noise, dust emissions, night-time light emissions and avoid the incidence of contaminated run-off. As such, the CEMP will ensure the environmental protection of surrounding areas, including ecological resources. This will ensure that no ecological resource is significantly adversely affected by the Works.

6.55 In view of the above, it is considered that the Works would not give rise to any significant effects to ecological resources.

[27] HM Government, (1981); Part I and Part II of Wildlife and Countryside Act (as amended). HMSO.

The Completed Development

6.56 The Development would deliver new and enhanced habitats through the inclusion of green roofs, vertical greening, new native hedges, mixed scrub and wildflower mixes in the landscaped areas. There would also be the provision of artificial nests for birds.

6.57 There would be enhancements to Wembley Brook to include the naturalisation of the watercourse and riverside planting to improve biodiversity and habitat diversity. This would be beneficial to biodiversity at the Site.

6.58 Although the completed Development would result in beneficial effects for wildlife, these are not anticipated to be significant.

Cumulative Scenario

6.59 As per the Development, the Cumulative Schemes do not propose any direct works to the statutory or non-statutory ecological sites and, should the construction programmes overlap, it is assumed the construction activities would be effectively managed via best practice environmental management controls and in accordance with relevant wildlife legislation to ensure adequate protection of protected and notable species including nesting birds. As such, no cumulative effect on flora or fauna is likely to arise during the Works. This would ensure the protection of surrounding ecological resources so that significant ecological cumulative effects would be unlikely.

6.60 The Cumulative Schemes also provide biodiversity enhancements through the provision of improved landscaping, green roofs and living walls. A biodiversity net gain is likely as a result of each of the Cumulative Schemes and the Development itself, which together would result in a beneficial effect in the local area. However, this is unlikely to be so great to result in significant cumulative effects on biodiversity.

Townscape, Visual and Heritage

The Works

6.61 The physical presence of a construction site would give rise to the presence of visible hoardings, plant and machinery and other activities associated with the construction of the Development. These have the potential to alter the existing townscape character of the area in an adverse manner. However, any adverse townscape and visual effects associated with the construction phase would be limited, localised and temporary. Furthermore, such impacts and effects could be effectively managed via compliance with relevant standard sectorial legislative requirements and the implementation of standard sectorial environmental management control measures detailed within a CEMP. Such mitigation measures are not contingent on the EIA regime, and vice vera. Consequently, it is anticipated they could be secured via appropriately worded standard planning conditions.

6.62 As the construction works proceed and the built form of the Development emerges, the townscape and visual characteristics of the Site will adjust to those that will be generated by the presence of the completed and operational Development. However, for the reasons stated below, the physical presence of the completed and operational Development is unlikely to have significant adverse effects upon the prevailing townscape or views.

6.63 Considering all of the above, it is not anticipated that the Development would have significant adverse effects upon townscape or views during construction.

The Completed Development

6.64 Given its scale and mass, the emerging Development will likely appear in short, medium and longer-range views. As such, it could affect the townscape character of the area in which it is located; and it could form part of the townscape setting of some heritage assets. However, the LBB's Tall Building Strategy (2020)[28] identifies the Stonebridge Park area as being appropriate for tall buildings.

6.65 Given their distance from the site, it is considered that the emerging Development would not have a significant adverse effect in respect of any designated or non-designated heritage assets identified within the study area. Though it is likely to be visible in conjunction with the Grade II listed Brent Viaduct and from the locally listed land designations, it will be read as a distant element, part of a taller group of buildings that signal the location of Stonebridge Park Station. Also, it is considered there would be no significant effects on Conservation Areas as a result of the Development given their distance from the Site. Therefore, it is likely there would be no significant adverse effects on the setting of the Grade II listed viaduct, locally listed land designations and conservation Areas.

6.66 In terms of townscape and visual effects, given the scale of the emerging Development, it will likely cause change in the local townscape and views, however this change is expected to be a beneficial one, and consistent with the emerging adjacent Wembley Point Masterplan. The location of the Site, adjacent to the station and along important thoroughfares, allows for a tall building proposal in the Site to sit comfortably, contributing to the otherwise fragmented urban grain of the area and improving legibility.

6.67 Overall, the Development is not expected to give rise to significant adverse effects in townscape and visual terms. Details of the design, visual and townscape implications will be addressed as part of a Townscape, Heritage and Visual Impact Assessment and the Design and Access Statement submitted with the planning application.

Cumulative Scenario

6.68 The Development would likely be visible in the context of three emerging cumulative schemes as identified in **Figure 6.1**.

6.69 It is assumed the visual intrusiveness associated with the construction of the Cumulative Schemes nearby will be effectively managed by a CEMP during construction helping to minimise cumulative effects should the construction of the Cumulative Schemes and the Development coincide. As such significant cumulative effects from construction works of the Development and Cumulative Schemes together is not considered likely.

6.70 Once the Site and the Cumulative Schemes are fully completed, they are likely to bring townscape improvements to the surrounding area, in particular in the context of Stonebridge Park Station. In combination, the Development and Cumulative Schemes together would contribute to a coherent corridor of large scale and tall development running alongside the North Circular, which will improve urban legibility in the area. The Development and Cumulative Schemes together will contribute to

[28] Brent Tall Building Strategy (2019). Local Plan Evidence and Design Guidance.

reinforcing the townscape character of Stonebridge Park, improving the overall visual amenity and the setting of heritage assets in the vicinity.

6.71 Overall, it is not anticipated that the Development would have significant adverse cumulative effects upon townscape, visual amenity or built heritage.

Ground Conditions and Contamination

The Works

6.72 As outline in **Section 5**, there is a potential for ground contamination to be present at the Site from on-site and off-site historical sources. Furthermore, such contamination could be encountered and / or mobilised during the intrusive groundworks required to facilitate the Development. It therefore follows that the Works could give rise to the risk of contamination exposure to humans (for example construction workers) and the wider environment.

6.73 In view of the above, there is potential for contamination to be present at the Site. However, such issues are common to almost all urban redevelopment projects particularly in London. Furthermore, legislation dictates that all redevelopment must not give rise to the unacceptable contamination of humans or the wider environment. As such, contamination can be successfully managed and mitigated via various standard means including:

- Further Site Investigation (SI) to further investigate, qualify and quantify the potential for contamination at the Site.
- Based on the SI findings, the preparation of an appropriate remediation strategy to be agreed in conjunction with LBB and the Environment Agency to ensure the Site is entirely appropriate for its end-use and causes no contaminative risks (and therefore effects) to human health and the environment.
- The selection and employment of construction techniques that minimise contaminative risks, particularly with regard to intrusive works such as piling.
- Adherence to relevant legislative and best practice construction mitigation measures to ensure a well-managed operation which minimises potential environmental risks to all receptors. The CEMP will outline management procedures for pollution prevention, hazardous materials storage, requirements for risk assessments and method statements, use of materials on-Site and the disposal of materials from the Site. The CEMP would outline health and safety requirements for workers who may encounter contaminants.
- Implementation of a surface water drainage strategy, including petrol / sediment interceptors.

6.74 A potential risk of encountering unexploded ordnance was identified on Site, therefore, appropriate mitigation measures will need to be implemented during the Works based on the recommendations of suitable qualified UXO specialists.

6.75 All of the above can be secured by standard planning conditions. As such and based upon the tried and tested effectiveness of the above, and in view of the fact that the Development will not introduce

contaminative land uses or activities to the Site once completed that cannot be easily controlled, it is not anticipated that the Development will give rise to significant contamination risk or effects. Nonetheless, to adhere with planning (not EIA) requirements, a Contamination Report will be submitted alongside the planning application for the Development.

The Completed Development

6.76 The Development does not propose any sensitive land uses or activities that would inherently be of a contaminative nature and as such does not pose any operational risk to Site users or nearby receptors.

6.77 In view of the above, the completed and operational Development is not anticipated to generate any significant impacts of effects upon ground conditions and contamination.

Cumulative Scenario

6.78 In the event the Cumulative Schemes encounter contamination issues, it is considered reasonable to assume the implementation of best practice environmental management controls and additional legislative requirements (separate to the EIA Regulations) would mean all matters would be (or have been) adequately dealt with so as to prevent significant effects on human health and / or the environment. Therefore, it is unlikely significant ground conditions or contamination cumulative effects would result either during the Works or on completion and operation of the Development and the Cumulative Schemes together.

Waste

The Works

6.79 The construction process would inevitably lead to the generation of waste, as is the case for any development project. However, the CEMP and a Construction Site Waste Management Plan would be submitted alongside the planning application and would ensure that waste is managed in-line with the relevant legislation and best practice to minimise waste generation and maximise reuse and recycling during the construction works. It is not anticipated that the waste leaving the Site would be of a hazardous or contaminative nature.

6.80 In view of the above, the Works is not anticipated to generate significant impact and effects associated with waste.

The Completed Development

6.81 The Development would not include for any land-uses or activities that would give rise to particularly hazardous waste materials. In line with policy requirements, the Development would be designed to ensure sufficient space and facilities are provided for the storage of segregated general and recyclable waste. In addition, the servicing of the Development would allow for adequate waste collection and disposal, as necessary. The Development is therefore unlikely to give rise to significant waste effects once completed and operational.

6.82 The operational Development would generate minimal waste, and none is understood to be hazardous in nature. Therefore, the completed and operational Development is not anticipated to generate significant impacts and effects associated with waste.

Cumulative Scenario

6.83 As for the Development, the Cumulative Schemes are also expected to employ good waste management practices during the Works so that significant cumulative effects are unlikely to occur from the Development and Cumulative Schemes together.

6.84 Similarly, the Cumulative Schemes would not include for any land-uses or activities that would give rise to particularly hazardous waste materials and it is assumed that they would be designed to ensure that sufficient space and facilities are provided for the storage of segregated general and recyclable waste in line with policy requirements. Significant cumulative effects are therefore unlikely to occur from the Development and Cumulative Schemes together, once completed and operational.

Water Resources, Flood Risk and Drainage

The Works

6.85 As per standard practice, the implementation of best practice environmental management controls, detailed within a CEMP and implemented accordingly, would ensure appropriate surface water drainage of the construction site, thereby ensuring no occurrence of significant localised surface water flooding during the Works. The CEMP would also include measures to prevent the contamination of surface water discharges from the Site during the construction phase. In view of this, the Works are not anticipated to generate significant impacts or effects to water resources, flood risk and drainage.

The Completed Development

6.86 **Section 5** notes that the Site is located in Flood Risk Zone 3, due to the location of Wembley Brook within the Site. As such, the Completed and Operational Development and future residents / visitors could be subject to significant risk and effects associated with flood risk during extreme events without appropriate mitigation.

6.87 Edenvale Young has therefore been appointed by the Applicant to advise on flood risk matters, and, in consultation with the Environment Agency, is developing an appropriate design solution for the Site. This includes defining appropriate design floor levels for the Site, locating more vulnerable uses above the design flood level (including an allowance for climate change), including a design strategy for safe egress from the Site in the event of a flood and providing flood compensation on the Site. Flood resilient construction techniques would also be incorporated where necessary in the construction of the Development at ground floor level.

6.88 The surface water strategy for the Approved Development involved the discharge of surface water into Wembley Brook. It is proposed that the Development would therefore follow the same approach and also discharge surface water to the Brook.

6.89 The Development will be designed to ensure surface water flooding is not increased at the Site, or elsewhere. In addition, climate change considerations require that the completed and operational

Development will be designed with the resilience to cope with increases in precipitation frequency and intensity which may give rise to increased incidences of surface water flooding events. This will be based on greenfield run-off rates and will include the climate change factor of 40%.

6.90 Based on the incorporation of these measures, on-Site occupants and users of the Development would be safe from flooding and there would be no adverse off-Site flood risk or drainage effects. Therefore, the likely effects of the Development in relation to fluvial and surface water flood risk would be insignificant.

6.91 To demonstrate this, a Flood Risk Assessment and a Foul / Surface Water Drainage Strategy will be submitted with the planning application.

Cumulative Scenario

6.92 It is assumed the with the implementation of best practice environmental management controls to minimise effects during the Works for both the Development and the Cumulative Schemes, it is unlikely cumulative effects would result during the Works in the event they overlapped.

6.93 It is assumed suitable that mitigation will be implemented to minimise off-Site flood risk effects from surface water as part of the design and planning permission for each of the Cumulative Schemes. As such, it can be concluded that there would be no significant cumulative flood risk effects arising from the Development together with the Cumulative Schemes.

Daylight, Sunlight and Overshadowing

The Works

6.94 As the Works proceed and the Development emerges, daylight, sunlight and overshadowing conditions around the Site will adjust to those that would be generated by the presence of the completed and operational Development. Therefore, given the reasons stated below, these are likely to be acceptable and thus the Works is not anticipated to generate significant adverse effects in regard to daylight, sunlight and overshadowing.

The Completed Development

6.95 There are a number of existing sensitive receptors located in proximity to the Site; namely residents of the eastern end of Tokyngton Avenue (numbers 51 to 62) to the north of the Site and the WEM Tower to the north-east of the Site.

6.96 The Applicant's Daylight / Sunlight Consultants, Point 2 Surveyors, have carried out an assessment of the impact of the emerging proposals for the Development using 3D computer modelling.

6.97 The assessment found that five properties on Tokyngton Avenue would experience some reduction in daylight using the Vertical Sky Component (VSC) calculations. However, all of these have windows that either retain a VSC of 23% or above, which it typically considered to be a reasonable / good level of VSC (daylight) or would have only a negligible reduction. All properties within the WEM Tower retain very

good levels of daylight in line with the Building Research Establishment (BRE) Guidance[29]. All properties were found to comply with the BRE Guidelines for daylight amenity when applying the No-Sky Line (NSL) methodology. As such, no significant effects on daylight amenity are expected as a result of the Development.

6.98 Similarly, the 3D computer modelling results showed that no significant effects on sunlight amenity for local residents are expected as a result of the Development with the predicted Annual Probably Sunlight Hours (APSH) meeting the BRE Guidance for all properties.

6.99 An assessment of overshadowing effects was also undertaken for the private gardens of properties on Tokyngton Avenue. All gardens were found to continue to adhere to the BRE Guidelines and no significant effects on overshadowing of amenity spaces are therefore considered likely as a result of the Development.

6.100 A Daylight and Sunlight Assessment will be undertaken for the Development once the design is fixed to confirm these findings and this will be submitted alongside the planning application.

Cumulative Scenario

6.101 Point 2 Surveyors have confirmed their view that whilst there is likely to be some cumulative effect on daylight amenity for residents of the properties on Tokynton Avenue, this is unlikely to be significant. The Wembley Point Cumulative Scheme is likely to result in significant effects on the WEM Tower as reported in the relevant ES[30] but there would be no cumulative effect resulting from the Development and Wembley Point Cumulative Scheme in combination.

Wind Microclimate

The Works

6.102 The prevailing wind in London is from the south-west. The Site is relatively open to much of the prevailing wind to the south-west, as the existing buildings in this area are low rise.

6.103 As the Works proceed and the Development emerges, wind conditions in and around the Site will adjust to those that will be generated by the presence of the Development once completed. It should be noted that the important factor for assessing wind microclimate effects is not whether there is a change in wind conditions, but whether the wind conditions are suitable (comfortable) and safe for the intended pedestrian or occupant use at a particular location.

The Completed Development

6.104 The Applicant's Wind Microclimate Consultant, Windtech Consultants (Europe) Limited, have carried out an assessment of the impact of the emerging proposals for the Development on wind conditions using computational fluid dynamics computer modelling. This has been undertaken inform the design of the

[29] Building Research Establishment (BRE) Guidelines. Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice, Second Edition. 2022.

[30] RPS, Wembley Point Environmental Statement: Volume 1, 2022.

Development and reduce the risk of major mitigation requirements at the end of design process. The assessment was undertaken using Lawson's 2001 Wind Comfort and Safety Criteria.

6.105 The computer modelling found that in the absence of any landscaping, the likely conditions in the winter season are likely to meet the Lawsons comfort criteria for the intended pedestrian activities in all locations in the surrounding area of the Site, except for pedestrians along Point Place. The conditions on the Site were also found to be unsuitable. However, recommendations for landscape design measures such as planters and tree planting have been made by Wintech Consultants, who are confident that these would result in the areas on the Site and along Point Place being suitable for strolling and seating activities.

6.106 The computer modelling found that in the absence of any landscaping, the likely conditions in the summer season on the roof terrace and balconies within the Development are likely to meet the Lawsons comfort criteria for the intended activities in most locations. For any balconies or rooftop areas where sitting and standing is intended and conditions were not found to be suitable, recommendations have been made by Wintech Consultants, to design in porous side screens and 0.9m high solid balustrades, which would result in these amenity areas being suitable for standing and sitting in summer months.

6.107 As this analysis is being used to inform the design of the Development and recommendations can be easily implemented and with confidence of their success, it is not considered that significant effects on pedestrian safety or comfort would result from the Development.

6.108 To demonstrate this a Wind Microclimate Assessment will be undertaken for the Development and will be submitted alongside the planning application for the Development.

Cumulative Scenario

6.109 With the Development and Cumulative Schemes together, wind conditions remain broadly similar to those with the Development in isolation. Additional shelter is provided by the Wembley Point Cumulative Scheme from the north-easterly wind direction and therefore calmer conditions are seen on-Site. However, slightly higher wind speeds are likely within the Wembley Point Cumulative Scheme site. However, these higher winds are mostly due to the Wembley Point Cumulative Scheme itself and not a direct result of the Development. As such, it is likely that with the previously noted mitigation measures in place, all spaces within the Development and immediate surroundings, are likely to be acceptable for the intended activity.

Socio-economics and Health

The Works

6.110 There is anticipated to be an increase in direct, indirect and induced employment associated with the Works. However, given the modest scale of the Development these benefits are not anticipated to have a significant effect on local employment.

6.111 Previous sub-sections demonstrate that the construction is not anticipated to give rise to any significant contamination, air quality, noise, microclimate, flood risk and/or socio-economic effects, all of which have the potential to affect human health and wellbeing. Additionally, with the implementation of a

broad range of standard, tried and tested construction related best practice environmental management controls, the health and wellbeing of construction site workers, local residents, local workers and visitors to the locality is unlikely to be significantly affected by the construction works.

6.112 Therefore, given the above, it is not expected that there will be any significant effects on socio-economics or health resulting from the Works.

The Completed Development

6.113 Once the Development is completed and operational, the resident population of the area would increase. As such, there would be an increased demand for social and community infrastructure and services in the form of education provision for school aged children; health care provision such as new patient spaces at GP surgeries and dentists; open space and play space and shops and local facilities. As outlined in **Section 5**, there are a number of primary and secondary schools within the area with capacity for new pupils. The GP surgeries within the local area are also accepting new patients. However, where necessary and justified, the potential increase in demand on education and health provision can be offset through financial contributions, in accordance with the statutory requirements such as Section 106 contributions and Community Infrastructure Levy.

6.114 As demonstrated earlier in **Section 6**, the completed and operational Development are unlikely to give rise to significant contamination, air quality, noise, pedestrian comfort and safety, flood risk and/or socio-economic effects. As such, with the Development in place, these environmental factors are unlikely to significantly affect the health and wellbeing of local residents, local workers, users and visitors of the Development and the surrounding locality.

6.115 Therefore, it can be concluded that the Operational Development would not give rise to significant socio-economic or health effects.

Cumulative Scenario

6.116 The Cumulative Schemes will also generate direct, indirect and induced employment opportunities during the Works and once the Development is completed and operational. However, the cumulative effect on employment from the Development and Cumulative Schemes together would unlikely give rise to a significant increase in employment in the context of Brent's current job numbers and future employment needs.

6.117 The Development and Cumulative Schemes together would likely lead to an increased demand for education and healthcare facilities. However, the Grand Union Cumulative Scheme would deliver a nursery and community centre. Also, as for the Development, it would be expected that if required, financial contributions would have been made, where justified and necessary, for the Cumulative Schemes through Section 106 and Community Infrastructure Levy to offset the demand for local health and education services.

6.118 As demonstrated earlier in **Section 6**, like the Development, the Cumulative Schemes are unlikely to give rise to significant contamination, air quality, noise, pedestrian comfort and safety, flood risk and/or socio-economic effects. As such, these environmental factors are unlikely to significantly affect the health and wellbeing of local people following completion and operation of the Development and the Cumulative Schemes together.

6.119 In the Cumulative Scenario, it is not anticipated that the Development would result in any significant adverse effects in regard to socio-economics or health.

Greenhouse Gases and Climate Change

The Works

6.120 Climate change is global in cause and effect. It therefore follows that by virtue of the scale of the construction site and the Development, the Works are unlikely to significantly contribute to global climate change.

6.121 In relation to the emission of greenhouse gases, previous sub-sections demonstrate that expected construction vehicular traffic flows (and therefore emissions which would include greenhouse gasses) are unlikely to be significant when considering the quanta of existing background traffic and emissions. Modern, efficient and low carbon emitting construction plant and machinery would be used throughout the Works.

6.122 Significant greenhouse gas emissions contributing to climate change is therefore unlikely during the Works.

The Completed Development

6.123 By virtue of the scale and nature of the Development, its operation would not significantly contribute to global climate change. Regardless, where possible, the Development would be designed to minimise greenhouse gas emissions and to ensure resilience to climate change.

6.124 As previously reported in **Section 6**, the overall vehicular trip generation from the Development is unlikely to be material. In addition, no combustion plant is proposed as part of the Development with the energy strategy comprising electric only air source heat pumps. It therefore follows that the Development is unlikely to give rise to significant changes to vehicular traffic or domestic heating emissions which would include for greenhouse gases.

6.125 With regard to climate change resilience, as noted in a previous sub-section the Site is located in an area of tidal and fluvial flood risk. However, the design of the Development would safeguard against such flood risks and effects at the Site and elsewhere, even accounting for climate change. Other climate change resilience measures would include optimising passive design within the buildings to reduce the risk of overheating and using measures to reduce water demand in all buildings.

6.126 Significant greenhouse gas emissions contributing to climate change is therefore unlikely once the Development is completed and climate change resilience measures would be incorporated into the design.

Cumulative Scenario

6.127 As for the Development, it would be anticipated that the Works associated with the Cumulative Schemes would be completed in line with best practice environmental measures as to ensure minimal carbon emissions where possible.

6.128 It is expected that the Cumulative Schemes would also be designed to minimise greenhouse gas emissions and to ensure resilience to climate change. Therefore, it is unlikely that there would be significant cumulative effects from greenhouse gas emissions and climate change once the Development and Cumulative Schemes are completed and operational.

Light Pollution

The Works

6.129 The Site is well lit with artificial light installations of varying age and is located in a well-lit urban area with high levels of light pollution.

6.130 During the Works, there may be periods where floodlighting / security and health and safety lighting would be required. However, as part of the CEMP, measures would be implemented to minimise artificial light spill and glare to nearby sensitive receptors surrounding the Site. As such, the construction activity is unlikely to give rise to any significant light pollution issues.

Completed Development

6.131 In respect of the completed and operational Development, a detailed lighting strategy / design would be secured by planning condition and agreed in advance of the completion of the Development with LBB. The strategy would be designed to relevant British Standards (BS), including BS 5489-1:2013 Code of Practice for the Design of Roads Lighting[31] and would take account of the Institute of Lighting Professionals Guidance Note 1 for the Reduction of Obtrusive Light[32]. Accounting for this it is likely that there would be a decrease in light spill and glare associated with the completed and operational Development with conditions improved as a result of the replacement of older light installations with modern installations complying with current standards. Notwithstanding this, as a result of the high levels of artificial light surrounding the Site, and the urban context of the Site, the reduction in light spill and glare from the Site is unlikely to be significant.

Cumulative Scenario

6.132 It can be assumed that the Cumulative Schemes would also have lighting designs that comply with modern standards as identified above. Accounting for this and the already high levels of artificial light in the surrounding area any change in light spill and glare associated with the Development and Cumulative Schemes together is unlikely to be significant.

Risk of Major Accidents and Disasters

The Works

6.133 All construction works would be managed in accordance with best practice environmental management controls and relevant regulations. Furthermore, as previously reported in Section 6 of this report, with standard, tried and tested construction related best practice environmental

[31] BS 5489-1:2013 Code of Practice for the Design of Road Lighting. Lighting of Roads and Public Amenity Areas. 2013.
[32] Guidance Note 1 for the Reduction of Obtrusive Light. Institute of Lighting Professionals. 2021.

management controls in place, the Works are unlikely to give rise to significant risks associated with contamination and surface water flooding.

6.134 As such, significant adverse effects in regard to the risk of major accidents and disasters during the construction of the Development is **not** considered to be likely.

The Completed Development

6.135 The completed and operational Development does not propose any land uses that would increase the risk of major accidents and disasters by virtue of being hazardous or operating complex processes. Furthermore, as reported previously in **Section 6** of this report, the completed and operational Development would be unlikely to give rise to any significant contamination or unacceptable flood risk and would be designed to be resilient to flood risk and ensure the safety of people living at the Development.

6.136 The nearest COMAH-registered establishments are the gas storage / distribution facilities operated by West Utilities Limited and BOC Gas, located 1.45km north-east and 2km south-east of the Site, respectively. Given the nature of the Development and the existing control measures in-place at the establishment, the risk of major accidents or disasters at the Site is not understood to be affected.

Cumulative Scenario

6.137 The above statements regarding the Development in isolation are applicable to the Cumulative Schemes, given that the nature of the proposals for the Cumulative Schemes are similar being urban mixed-use developments. Consequently, there is no potential for significant cumulative risks of major accidents and disasters during any concurrent construction works or following completion and operation of the Development and the Cumulative Schemes together.

7. Summary and Conclusions

7.1 The Development has been screened under Schedule 2, Class 10 'Infrastructure Project' Subsection (b) 'Urban development projects'. The screening criteria for this type of development is if:

- The development includes more than 1 hectare of urban development which is not dwelling house development. Or
- The development includes more than 150 dwellings. Or
- The overall area of the development exceeds 5 hectares.

7.2 As such, an EIA Screening Report has been prepared on the basis that the Development will include more than 150 dwellings. The report has identified the following key points:

- The Site is not located in a 'sensitive area' as defined by the EIA Regulations. Accordingly, the absorption capacity of the natural environment in and surrounding the Site is judged to be high; the Site and its immediate surrounds are resilient to change.
- The effects associated with this type of development are not of a level of magnitude, complexity or significance such that an EIA would be required to evaluate them.
- The potential for significant effects should be adequately dealt with via design measures and the implementation of standard legislative requirements and the implementation of best practice environmental management controls out-with the EIA regime.

7.3 We request a formal EIA Screening Opinion on the requirement for EIA and would be grateful if LBB would respond by way of a formal EIA Screening Opinion within three weeks.

Contact Details

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