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17th March 2023

Dear Tibbalds,

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

Proposal: Request for Screening Opinion as to whether an EIA is required in respect of an application for the development of parts of the Brent River Park adjacent the St. Raphael's Estate in Stonebridge to deliver 195 new residential units across 6 blocks, including four towers ranging from 8-10 storeys, and two 3 storey blocks of terraced housing. The site is 4ha in size, and sited on the south eastern part of the park, and will in addition to residential, including a small 99sq.m. commercial unit, 2 service roads, 20 disabled parking bays, and associated landscaping including the provision of new play spaces in the park.

Site: St. Raphael's Estate, Brent River Park, Stonebridge

This Screening Opinion has been prepared in relation Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations') "Requests for screening opinions of the relevant planning authority". The site falls within Schedule 2 10 (b) (ii) as it includes over 150 dwellings (195 proposed), and therefore a formal Screening Opinion is required.

Upon review of the material supplied in association with the screening request from the applicant, plus other material that is mentioned in association with this screening opinion, the London Borough of Brent considers that the proposed development is not EIA development. As such it will not require an EIA to be undertaken to accompany any planning application for development described that incorporates the proposed mitigation measures to address potential adverse effects of the development as set out in this screening opinion.

As required by Regulation 6(6) of the EIA Regulations please find attached the Council's Statement of Reasons which provides full reasons for this conclusion.

If you require any further assistance, please do not hesitate to contact Paul Lewin, on telephone 020 7937 6710 or email paul.lewin@brent.gov.uk.

Yours sincerely,

Paul Lewin
Team Leader Planning Policy

EIA SCREENING OPINION STATEMENT OF REASONS
The Town and Country Planning (Environmental Impact Assessment) Regulations 2017

Description of proposed development – The proposed development of parts of the Brent River Park adjacent the St. Raphael's Estate in Stonebridge to deliver 195 new residential units across 6 blocks, including four towers ranging from 8-10 storeys, and two 3 storey blocks of terraced housing. The site is 4ha in size, and sited on the south eastern part of the park, and will in addition to residential, including a small 99sq.m. commercial unit, 2 service roads, 20 disabled parking bays, and associated landscaping including the provision of new play spaces in the park.

Site – St. Raphael's Estate, Brent River Park, Stonebridge

Notes - The assessment of the proposed development's likely significant effects is in relation to the EIA Regulations only. The assessment does not imply any consideration of the planning merits of the proposals or indicate the likely success or otherwise of an application for planning permission.

Introduction

Tibbalds have been notified that, as a result of the proposal falling within Schedule 2 10 (b) (ii) development, the proposal is required to be subject to a Screening Assessment. Associated with this request details of the site boundary, proposed development and an initial assessment of the potential impacts of the proposed development taking account of associated submitted technical studies to support the request in March 2023.

The Existing Site and Surrounding Area

The site occupies 4ha of the Brent River Park which itself is identified as a Local Open Space at ~16ha in total. It is immediately adjacent to St. Raphael's Estate to the north east, the North Circular Road to the south, and further parkland to the west and north. To the south west of the park is a parade of shops fronting onto Harrow Road. Immediately to the south of this is the junction of Harrow Road and the North Circular Road. It is bounded by the River Brent (Wealdstone Brook), and beyond that is Monks Park which is contiguous with the Brent River Park. Beyond Monks Park to the north is Wembley Park Strategic Industrial Land, and to the north west is a residential terraced area. Further to the north west of the site is the Wembley Opportunity and Growth Area which is to deliver thousands of new homes. To the west of the Harrow Road and south of the North Circular Road is the Stonebridge Tall Building Zone. This is bisected by the North Circular Road, including Wembley Point and Argenta House to its north, and the Bridge Park leisure centre and Unisys buildings to the south which are all set for redevelopment/intensification, plus residential properties bounded by North Circular Road/ Conduit Way.

The proposed site represents phase one of a larger masterplan, preparation of which began in 2019. This is being prepared in order to help improve the local environment and life opportunities of residents, in particular the St. Raphael's Estate. The masterplan will, among other things, see the delivery of ~400 new homes. This will be through an 'Infill+' approach, which like with this proposal, will see the delivery of new built forms within the park itself, and other associated improvements in the existing estate.

The site itself is almost entirely of soft landscaping, and includes a significant portion of land designated as a Site of Importance for Nature Conservation (SINC). The site is also a Green Chain. It comprises riverbank, mixed woodland, shrubs, and grassland. Portions of hardstanding exist, including the existing skate park which is to be reprovided elsewhere within the site.

The site is well connected by public transport, achieving a Public Transport Accessibility Level (PTAL) of 3-4. This reflects the site's close proximity to Stonebridge Park LUL station, providing access to the Bakerloo line and London Overground lines to Watford and central London. The site is also within close proximity to a number of bus routes along the North Circular and Harrow Roads.

The site is not within a Conservation Area or Site of Archaeological interest, and neither does it include any listed buildings. The Brent River Park (formerly Tokyngton Recreation Ground), along with the adjacent Monks Park, however, is designated as a Locally Listed Park. The London historic parks and gardens trust website identifies the park as including a number of notable historic features linked to its past. These include the remains of a bowling green, conifers, a climate pavilion, and the base of a flagpole from the old Wembley stadium.

The closest listed buildings and structures include the Grade II Listed Brent Viaduct ~650m to the west, Grade II Listed Stonebridge Park Public House ~800m to the south, and the Locally Listed 1 Morland Gardens ~850m to the south.

The site boundary goes right up to the channel of the River Brent. As such, parts of the site, primarily those immediately adjacent to the River Brent, are within Flood Zones 3a and 3b for fluvial and tidal flooding. Small portions of the site are also susceptible to surface water flooding, being designated as Flood Zone 3a for surface water flooding.

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

The Size and Design of the Proposed Development
The proposed development of parts of the Brent River Park adjacent the St. Raphael's Estate in Stonebridge is to deliver 195 new residential units across 6 blocks, including four towers ranging from 8-10 storeys, and two 3 storey blocks of terraced housing. The site is 4ha in size, and sited on the south eastern part of the wider park. It will in addition to residential, include a small 99sq.m. commercial unit, 2 service roads, 20 disabled parking bays, and associated landscaping including the provision of new play spaces in the park. The site will be accessible by vehicle via Pitfield Way and Tillet Close from within the St. Raphael Estate.

Information Provided in Support of the Request for a Screening Opinion
The applicant has provided a supporting statement to assist in the determination of the Screening Opinion. This is alongside the extensive provision of reports provided as part of the full planning application 23/0580, including: site location plan and drawings; Air Quality Assessment; Arboriculture Survey; Arboriculture Impact Assessment; Ecological Appraisal, Impact Assessment, and Biodiversity Net Gain Report; Energy Assessment; Flood Risk Assessment; Ground Investigation Report; Landscape Report; Lighting Strategy; Noise Impact Assessment; Sunlight/Daylight and Overshadowing Assessment; Townscape Analysis (as part of the Design and Access Statement); Sustainability Assessment; Transport Assessment; Travel Plan; and Wind Environment Assessment.

Previous History
The site is Public Open Space and has not recently been developed. Prior to the development of the adjacent St Raphael's Estate in the 60s and 70s, the site was occupied by water management plant and filter beds which were subsequently filled in and redeveloped to deliver the housing estate and parklands.

Large Scale Development within the Vicinity

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

Argenta House, Argenta Way (18/4847) - Demolition of the existing two storey building (Use class B1) and redevelopment to provide a 24-storey building containing residential dwellings with associated car and cycle parking, provision for bin stores, landscaping and ancillary works, subject to Deed of Agreement dated 14 August 2020 under Section 106 of the Town and Country Planning Act 1990. (Granted 18/08/2020) – **Not started.**

18/0321 (St George Developments plc) - Former Northfield Industrial Estate & units 2-18 Beresford Avenue & Abbey Works Estate, Wycombe Road, Wembley, HA0 & Ace Corner & Capital House, North Circular Road, London, NW10 Hybrid planning application for the redevelopment of Northfield industrial estate: Outline planning permission for the demolition of existing buildings and structures on the site, all site preparation works and redevelopment to provide new buildings ranging from 35.75m AOD to 111.95m AOD in height, with a total floorspace (GEA) of up to 309,400 sq. m (excluding basement up to 42,000 sq. m GEA) to accommodate 2,900 homes (Use Class C3), business and storage and distribution (Use Classes B1a, B1c and B8), commercial (Use Classes A1, A2, A3, A4 and A5), community and leisure (Use Classes D1 and D2) including community centre and nursery, new basement level including energy centre, associated storage, cycle and vehicle parking, new vehicular accesses, associated highway works to Beresford Avenue, landscaping and creation of new public and private open space, ancillary facilitating works, various temporary meanwhile uses, interim works and infrastructure. Full planning permission for demolition of existing buildings and structures on the site, all site preparation works and the development of Phase 1 (Buildings A, B, C and D ranging from 1 to 14 storeys in height) to comprise 402 homes (Use Class C3); 910 sq. m (GEA) of business floorspace Use Class B1a); 1,290 sq. m (GEA) of commercial floorspace (Use Classes A1, A2, A3, A4 and A5); and 1,610 sq. m (GEA) of community and leisure floorspace (Use Classes D1 and D2), including a community centre and nursery; together with new basement level including energy centre, associated storage, cycle and vehicle parking, new vehicular accesses, associated highway works to Beresford Avenue, landscaping and creation of new public and private open space, ancillary facilitating works, various temporary meanwhile uses, interim works and infrastructure. (Granted 28/09/2018) **Phase 1 started.**

Other Environmental Assessments

Regulation 5(5)(b) of the EIA Regulations requires the relevant planning authority to take into account the results of any relevant EU environmental assessments.

Development Plan

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

An Integrated Impact Assessment (IIA) accompanies the Local Plan, which incorporates the SA and SEA – that consider the potential for significant economic, social and environmental effects. This document has been considered when generating the EIA Screening Opinion.

The SAs satisfied the requirements of the EC Directive 2001/42/EC and Strategic Environmental Assessment (SEA) Regulations on the assessment of the effects of certain plans and programmes on the environment.

These documents have been referred to when generating the EIA Screening Opinion.

Legislation

The proposed development does not fall within any of the descriptions of development listed in Schedule 1 of the EIA Regulations, and is therefore not a 'Schedule 1 development'. The development does, however, fall within the description of a Schedule 2 development, classified under item 10 (b) as 'urban development projects'.

'Schedule 2 development' means development (other than exempt development – which this is not) of a description mentioned in Column 1 of the table in Schedule 2 where:

a) any part of that development is to be carried out in a sensitive area; or
b) any applicable threshold or criterion in the corresponding part of Column 2 of that table is respectively exceeded or met in relation to that development.

No part of the proposed development is to be carried out in a 'sensitive area' as defined by the EIA Regulations.

The threshold for item 10(b) is as follows:

(i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or
(ii) the development includes more than 150 dwellings; or
(iii) the overall area of the development exceeds 5 hectares.

The proposed development is for approximately 195 residential units. As such, it exceeds the threshold for 150 dwellings, and therefore the proposed development therefore constitutes 'Schedule 2 development'.

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

Likely Significant Effects

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

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

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

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

Appendix A – Consideration of Likely Significant Effects

Air Quality

The site is located within the Brent Air Quality Management Area (AQMA), and the London Plan Air Quality Focus Area (AQFA) for the North Circular Road from Stonebridge to Gresham Road in Neasden. The majority of Brent has been designated as an AQMA, and therefore even small increases in emissions can lead to adverse effects. The AQMA has been declared for exceedance of the annual mean national objective for nitrogen dioxide (NO2) and the 24 hour mean national objective for particulate matter (PM10). Only small parts, as determined as being of strategic significant by the Mayor of London through the London Plan, have been designated as AQFAs. These are designated in locations that not only exceed the EU annual mean limit value for nitrogen dioxide (NO2), but are also locations with high human exposure, such as this stretch of the North Circular Road which includes a significant number of sensitive residential receptors.

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

Documentation Accompanying the Planning Application: An Air Quality Assessment has been provided. As the site is within an AQFA, this demonstrates the delivery of Air Quality Positive Development, in accordance with Local Plan policy BSUI2.

<u>Construction</u>

Machinery used during construction can generate new sources of emissions, as well as traffic movements to/from the site and the works themselves.

When assessing the effect of dust emissions generated during construction works, receptors are defined as the nearest potentially sensitive receptor to the boundary of the site in each direction. These receptors have the potential to experience effects of greater magnitude due to emissions of particulate matter generated by the works, when compared with more distant receptors.

The receptors in close proximity to the site, combined with the new emissions, means that there is the potential for adverse effects as a result of the construction of the proposed development.

Whilst there is the potential for adverse effects, with the implementation of standard best practice measures, it is not anticipated that the effects would be significant. The effect of dust soiling and PM10 can be reduced to negligible with the implementation of appropriate mitigation measures. These standard mitigation measures can be implemented through a construction environmental management plan (CEMP), which can be secured through a standard planning condition.

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

<u>Operation</u>

Air quality emissions during operation will be from new traffic generation and heating infrastructure. Consideration also needs to be given to the potential effects on the new internal receptors given the location for the proposed development adjacent to a main road.

The application is to include 20 parking spaces, providing a low parking ratio, to meet disabled parking needs, of 10%. The new service and access roads are primarily for disabled residents, bin lorries, and emergency vehicles. A delivery hub has been provided at the edge of the new development to consolidate deliveries and reduce trips through the site. Heating will be provided by individual Exhaust Air Heat Pumps which use electricity. As such, limited impacts are expected to arise from new trips and heating systems.

Given the site's proximity to the North Circular, significant mitigation is required to ensure proposed residents are not exposed to unacceptable levels of air pollution. To ensure good indoor air quality and to mitigate against overheating without the need for exposure to outdoor noise and air pollution, individual units are provided with Exhaust Air Heat Pumps, mechanical ventilation, and air purification. Balconies are proposed as winter gardens which will protect private outdoor amenity against air pollution. These measures are considered suitable and sufficient to ensure indoor health and amenity is upheld.

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

Mitigation

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

The developer should consider the potential impact of air quality and dust on occupational exposure standards (to minimise worker exposure) and breaches of air quality objectives that may occur outside the site boundary. Continuous visual assessment of the site should be undertaken and a complaints log maintained in order determine the origin of a particular dust nuisance.

Suitable operational mitigation to be secured through mechanisms in the building design and services including Exhaust Air Heat Pumps, mechanical ventilation, and air purification, winter garden balconies and associated planning conditions to ensure that new internal receptors are adequately protected.

Archaeology

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

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

Construction

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

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

Operation

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

Mitigation

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

Built Heritage

Documentation Accompanying the Planning Application: The site is not within a Conservation Area or Site of Archaeological interest, and neither does it include any listed buildings. The closest listed buildings and structures include the Grade II listed Brent Viaduct ~650m to the south, Grade II Listed Stonebridge Park Public House ~800m to the east, and the Locally Listed 1 Morland gardens ~850m to the east.
What about the Locally Listed Park element – reference to this listing above focuses on built structures? A townscape analysis has however been undertaken as the proposal is for buildings in excess of 30m in height and is not within a Tall Building Zone.

Construction

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

Operation

The height of the proposed development will be up to 10 storeys, and therefore a greater scale than that previously on site or that surrounding the site, which is generally up to 4 storeys with the exception of Wembley Point and the Unisys building at the crossroads of Harrow Road and the North Circular. A cluster of tall buildings are evident to the west in the Alperton Growth Area and to the north in Wembley Park.

Given the height and encroachment into the park the development is likely to have adverse impacts on the listed park, however, these are not considered so significant to warrant an EIA.

Mitigation

During construction, ensure the erection and maintenance of hoarding.

Climatic Factors

Documentation Accompanying the Planning Application: A Wind Microclimate Assessment, Sustainability Statement, Whole Life-Cycle Carbon Assessment, Energy Statement including Overheating Assessment, and a Circular Economy Statement are all being provided.

Construction

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

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

Operation

The applicant has ensured that units are energy efficient to reduce operational costs for residents for on-going affordability. The applicant therefore achieves an 80% on-site reduction against building regulations part L requirements, including a 10% reduction through energy efficiency, and 70% through on-site energy generation (PV solar), which is in excess of London Plan policy SI2 minimums of 35%. This is a minor shortfall against net zero requirements, and as such, a financial contribution toward the Council's Carbon Offset Fund is proposed of £107,063.

The sustainable building methods to be utilised to minimise development energy consumption will be set out within the above listed documents. The applicant, to achieve planning permission, will be expected to comply with the Development Plan requirements on energy reduction and sustainability.

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

Mitigation

A CEMP should be secured that includes measures to reduce emissions e.g. management of plant to prevent plant running when not in use.

The accompanying Whole Life Carbon Assessment includes an assessment of materials used and why they were chosen, including to reduce embodied carbon emissions and ensure the design and materials are robust and adaptable. Recommendations included the reuse of existing materials on-site, such as the existing skate park which is to be demolished and used as hardcore; the use of robust materials to increase lifespan and reduce maintenance requirements; and the use of lower carbon materials such as wood in the terrace blocks to reduce embodied carbon. These measures are welcome but not considered to be significant, and will go some way cumulatively toward the reduction in the schemes embodied carbon toward net zero policy compliance.

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

Contaminated Land

Documentation Accompanying the Planning Application: The applicant has prepared a Ground Investigation Report which assesses soil contamination.

The site's existing use is public open space. Previous uses of the site have been for the processing of wastewater, including through filter beds. Close proximity to the River Brent allows for potential disturbance of contaminated matter and its ingress and run-off into surface water bodies. The above report identifies a number of elevated harmful substances in the soil, and associated mitigation required to make development acceptable as below.

Construction

During the construction process there is the potential to affect water quality through accidental pollution events, such as fuel spills and increased sediment within surface water passing through to adjacent watercourses. The implementation of standard impact avoidance measures should be secured through the CEMP. In addition, the potential of contamination on site could result in pathways either above or below ground being created that lead to watercourses, for example through piled foundations. This will require measures to avoid such potential. With the implementation of standard impact avoidance measures to ensure that the site is adequately protected, no significant effects are anticipated. It is not considered, given the scale of the development and works proposed, that there will be any significant effects on either water quantity or hydromorphology during construction.

Operation

There is the potential the operation of the proposed development to affect the foul and surface water capacity/ quantity due to an increased demand. Whilst there may be an increase in demand, given the scale of the development, it is not considered to lead to significant effects. There is the potential for pollutants originating from motor vehicles to enter the surface water and ground water systems. Such risk can be mitigated through the inclusion of pollution control measures in surface water drainage systems, which can be secured by condition. It is not considered, given the scale of the development and the limited parking (20 spaces) and the implementation of flood mitigation and adaptation such as SuDS that there will be any significant effects on either water quality or hydromorphology once operational.

Mitigation

A CEMP should be secured that includes measures to protect against and deal with accidental pollution events. The Ground Investigation Report including a soil assessment will identify if and where contamination is present and measures required to ensure that any construction activity does not increase risk to water quality will be secured through planning condition. The implementation and management of SuDS and associated pollution control mechanisms for surface drainage should be secured though a planning condition.

As such it is not anticipated that the environmental effects will be of such significance to warrant EIA.

Daylight, Sunlight and Overshadowing

Documentation Accompanying the Planning Application: A Daylight, Sunlight and Overshadowing Assessment has been provided, along with a townscape analysis.

The development includes buildings up to ~34m in height. The site is immediately adjacent to residential uses to the north east. To the south is a wide expanse of the North Circular Road. To the west and northwest is the park. Existing residential receptors and proposed residential receptors will be the most sensitive uses. The park is also sensitive, and requires a minimum of 2 hours of daylight to all parts on the spring equinox. The above report

considers the impact of the proposal against BRE industry standards during construction and operation.

Construction

During construction, there will be a change in the provision of daylight/sunlight due to the construction equipment (i.e. cranes) and the erection of the new buildings.

The construction equipment will be temporary and short-term, and therefore not considered to be significant.

The erection of the new building will generate some adverse effects as it is built out. The construction effects will however be no greater than the completed, operational development, which are not considered to be significant.

Operation

The operation of the proposed development will introduce buildings up to 10 storeys in height onto the site. Due to the proximity of nearby sensitive receptors and the height there is the potential for the proposed development to affect surrounding receptors. The associated daylight and sunlight assessment will provide evidence as to how the application has considered and been designed with this in mind to be within acceptable industry standards and policy compliance limits. Given the size of the site, its location and potential for change as noted in policy BP5 of the Local Plan, it is considered that these limits can be achieved,
which the above reports demonstrate.

It is acknowledged that some properties may be adversely affected by the proposed development, however given the number of receptors and the site's urban location, the effects are not considered to be significant.

Mitigation

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

Biodiversity (including flora and fauna)

Documentation Accompanying the Planning Application: An Ecological Appraisal and Impact Assessment, and Biodiversity Net Gain Statement have been provided.

The site is currently used as public open space. It is also designated as a SINC and Green Chain. The site therefore includes a significant quantum of flora, and therefore general biodiversity potential. The SINC is large, stretching the length of the river from the Metropolitan Railway Line in the north, to Harrow Road in the south. This part of the SINC was added as part of the 2014 SINC review to 'reflect more accurately the biodiversity interest provided on the ground.' It includes a range of tree species, scrub, and grassland. Due to the size of the site, and its potential to link the surrounding green grid, it is designated as a Green Chain.

The accompanying documentation notes that there is no flora of more than local value or habitats which are likely to provide breeding, hibernating, or roosting opportunities, particularly for protected species such as bats or schedule 1 birds. This is identified as being due to the site's proximity to the North Circular Road which presents a large barrier to dispersal, and contributes significantly toward immediate noise pollution. As such, the development proposes to reprovide improved habitats elsewhere on site in the core of the

SINC adjacent to the river. It will also provide a physical noise buffer to enhance the value of the remaining park. This demonstrates a biodiversity net gain of 8.52%.

The application will also result in the loss of 41 trees. 17 of these are from the SINC area. None are Category A, and 19 are Category B, with the remainder being predominantly Category U. To achieve the above biodiversity net gain and ensure reprovision of lost canopy cover in accordance with Local Plan policy, 240 trees are proposed to be planted. 90 of these will be planted in the SINC area, resulting in a net gain of 73 trees there. 60% of proposed trees are heavy standard (12-14cm trunk girth), and 40% semi-mature (18-30cm trunk girth), meaning trees are likely to survive and provide value from the outset. This will see the improvement of the SINC's woodland area. The increased density of this woodland will assist in reducing noise penetration to the park, and core SINC area adjacent to the river. It is therefore considered that the ecology of the park will be enhanced for fauna which may otherwise not use the area due to excessive noise, although impacts are unlikely to be significant.

Construction

It is noted that a Construction Environment Management Plan (CEMP) and Landscape Ecology Management Plan (LEMP) will be produced as part of the application. Measures identified in these plans will ensure pollution, spread of invasive species and harm to protected species are mitigated, and that the landscape is protected. As such, no significant effects are considered to be likely.

Operation

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

Mitigation

There are no designated sites (SSSI or LNR) within sufficient range of the site to be affected by the construction or operation of the site, although parts of the site adjacent to the North Circular Road are designated as a SINC. The Ecological Appraisal includes recommendations for mitigating harm to on-site ecology, some of which have already been integrated into the proposal, and others will need to be addressed through the required CEMP and LEMP. Providing these recommendations are observed, no significant impacts are anticipated.

Flood Risk

Documentation Accompanying the Planning Application: Flood Risk Assessment including drainage and SuDS plan.

As the site is in excess of 1ha in size, a Flood Risk Assessment (FRA) has been provided. Due to proximity to the River Brent, parts of the estate and park are designated Flood Zones 2 and 3 for fluvial flooding. Indeed, flooding is a recurring issue in the area. Small portions of the site are also susceptible to surface water flooding, being designated as Flood Zone 3a for surface water flooding.

The proposal seeks to address flooding issues by increasing the capacity of the park to alleviate flooding through natural and engineered means. Ultimately, the combination of SuDS, water attenuation ponds, tanks and swales, serves to bring parts of the park back into

functional floodplain and ensure greenfield run-off rates are restored. This considers the impact of climate change, ensuring that the area is resilient to 1 in 100 year flood events. This will ensure that parts of the existing estate which are set within areas of Flood Zones 2 and 3 will not continue to flood. None of the proposed buildings are set within flood zone 2 or 3.

Construction

Given the scale of the development and that the site is outside of fluvial Flood Zone 3, in the construction process there is considered to be limited risk to property and people. As such, the construction of the proposed development is not considered to significantly affect flood risk.

Operation

The proposed development site is largely located in an area at low risk of flooding fluvial flooding, and of surface water flooding. Small parts of the site as noted are within fluvial Flood Zones 2 and 3, and surface water Flood Zone 3a, with built form and sensitive uses being developed in areas outside of these designated zones, with none of the built form being within flood zones 2 and 3 for fluvial flooding, and limited amounts being within current surface water flood zone 3 which is likely to change as a result of proposed mitigative measures. Small portions of non-sensitive uses, such as residential gardens, are located within food zone 2. The proposed development does have the potential to affect the onsite infiltration rates through changes to the amount of hardstanding. Providing the application accords with Development Plan policy, and achieves greenfield run-off rates, the operation of the proposed development is not considered to significantly affect flood risk. This will need to be achieved, through on-site attenuation including restoring some of the park to functional floodplane to reduce the risk of typical fluvial flooding events.

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

In order to achieve this, the following methods will need to be considered:

1. storage of rainwater for later use
2. infiltration through use of porous surfaces to external landscaped areas
3. attenuate rainwater by storing in tanks for gradual release
4. discharge rainwater to the combined sewer

Mitigation

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

Human Health

It is considered that human health (both of existing and new receptors) has been appropriately considered within the relevant topic sections (e.g. water contamination or air pollution) and as such, reference should be made to these sections as required.

Land (land take)

The construction and operation of the proposed development will be on greenfield, public open space land, which under the NPPF definition is not previously developed land. This will see greenfield loss of ~8,540sq.m., equivalent to ~5% of the wider park area. Due to proximity to the North Circular Road, and the design of the existing estate, this land is considered to be comparatively underutilised for recreation and by wildlife. As such, the proposal, through a range of interventions, seeks to increase the value of the remaining space for these purposes. Although a quantitative loss of open space has occurred, it is considered that as a result of the development, the recreational facilities and bio-diversity will be improved, although this is not considered to be significant. No discipline specific mitigation has been relied upon for the EIA Screening Opinion.

Material Assets

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

Major accidents and/or disasters

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

Noise and Vibration

Documentation Accompanying the Planning Application: A Noise Impact Assessment, including Vibration Assessment has been provided.

The site is immediately adjacent to the North Circular Road, which is a significant emitter of noise pollution in excess of 80 decibels. This currently impacts existing residents in the estate, and users of the park. The development includes the provision of 195 residential units, and as such, these receptors will also be sensitive toward this source of noise pollution.

<u>Construction</u>

Machinery used during demolition/construction can generate new sources of noise, as well as construction traffic movements. The nearby receptors combined with the new noise emissions, means that there is the potential for adverse effects as a result of construction activities.

The Noise Impact Assessment did not identify any issues which could not be properly mitigated through conventional construction means.

Given the scale of the development, standard impact avoidance measures can be implemented to reduce emissions from construction activities, which will be secured through the CEMP. The works will be required to adhere to the Council's Code of Construction Practise (CoCP) (e.g. restricting the time at which works can be undertaken) which ensures that adverse effects are appropriately controlled and minimised. No significant effects are therefore anticipated.

<u>Operation</u>

Part of the reasoning and justification for the proposed development is to provide the park with a noise buffer, reducing its penetration and impact on the amenity of the park. This is being provided in the form of four 8-10 storey towers, in addition to the existing embankment which is being bolstered with new trees. Therefore, to some extent, the impact of noise on the park as a result of the proposed development will be reduced, as demonstrated in the Noise Impact Assessment.

For the proposed receptors a number of measures to ensure comfortable and compliant environmental conditions are achieved. Balconies are proposed as winter gardens which will protect private outdoor amenity against noise and will go some way towards insulating the internal living spaces as well. Triple glazing is also proposed to protect against noise pollution. To ensure good indoor air quality and to mitigate against overheating without the need for exposure to outdoor noise and air pollution, individual units are provided with Exhaust Air Heat Pumps, mechanical ventilation, and air purification. These measures are considered suitable and sufficient to ensure indoor health and amenity is upheld.

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

The scheme will essentially be car free, with only 20 disabled parking spaces being provided. Aside from this, transport into the site is expected to be limited to waste and emergency vehicles, in addition to delivery vehicles utilising the delivery drop off lockers for consolidation, which are at the entry to the site. There are no through roads on the site.

No significant effects are therefore anticipated.

Mitigation

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

Suitable mitigation required to be included within the design of the proposed development to ensure that new internal receptors are adequately protected – including the use of appropriate glazing. It is also recommended that some habitable rooms be treated with acoustic trickle vents, air bricks or mechanical ventilators, in order to provide adequate ventilation to the standards.

Socio-Economic (including population)

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

Construction

The proposed development would create benefits to local employment though providing temporary employment during construction. Apprentices/ training…..The application through meeting policy requirements will also result in the delivery of affordable housing. This is considered to be beneficial, but not significant.

Operation

The development will be of 100% affordable homes. This will provide affordable housing for local people who are not otherwise provided for by the market. This will provide security, reduce potential for homelessness, and improve lift outcomes. The estate also suffers from overcrowding due to local demographics. As such, many of the homes are larger family homes including 4 bed 7 person properties, which can cater to extended families who will move there from the estate. This will therefore alleviate issues associated with existing problems of overcrowding. Small community benefit/ jobs in the community/ commercial space?

Community Infrastructure Levy (CIL) payments will be sought to offset the effects of the development. These financial contributions will mitigate adverse effects, so that significant effects are unlikely.

Mitigation

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

Soil (organic matter, erosion, compaction, sealing)

Construction

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

Operation

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

Mitigation

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

Telecommunications

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

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

Townscape and Visual Impact

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

Documentation Accompanying the Opinion Request: The Design and Access Statement includes a Townscape and Visual Impact Assessment (TVIA).

The site is not located within a Tall Building Zone, but has proposed buildings in excess of 30m which should be directed towards Tall Building Zones. To consider the impact of the buildings, the applicant has therefore provided the TVIA. The site is effectively open on three

sides, with only the northeast boundary being immediately shared with sensitive residential receptors. To the west, south west and south is the Stonebridge Tall Building Zone, which is to see buildings delivered in excess of 30 storeys. On the application site, the taller elements comprise 8-10 storeys. The TVIA identifies that these buildings will not have an unacceptable impact on the existing townscape, or existing strategic views.

Construction

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

Operation

The height of the proposed development will be up to 10 storeys (~34m) and therefore a greater scale than that previously on site or in the immediate area (up to 4 storeys). However, Local Plan policy BP5 does recognise the potential of this area to be subject to change to achieve required socio-economic outcomes for existing residents and improve the local environment.

The TVIA identifies that the development assists the appearance of stepping up/down from the nearby Tall Building Zones of Stonebridge Park and Wembley Park, and that it reads as being subservient to these buildings, and therefore not prominent in itself. Impacts are therefore not considered to be significant.

Mitigation

During construction, ensure the erection and maintenance of hoarding.

Traffic and Transport

Documentation Accompanying the Planning Application: The proposed is accompanied by a Transport Statement, draft Travel Plan, and Servicing and Delivery Management Plan.

The site is well connected by public transport, achieving a Public Transport Accessibility Level (PTAL) of 3-4. This reflects the site's close proximity to Stonebridge Park LUL station, providing access to the Bakerloo line, and the London Overground from Watford to central London. The site is also within close proximity to a number of bus routes along the North Circular Road and Harrow Road.

Construction

There will be an increase in the number of vehicles accessing the site during the construction phase, however, given the scale of the development the anticipated numbers are not considered to be substantial. The site is also well placed in relation to the strategic road network, enabling larger vehicles to access the site with greater ease and for the most part avoid smaller residential roads.

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

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

Operation

The proposal is essentially car free, with only a limited amount of disabled parking spaces (20) being provided. These will be scattered throughout the site to allow for easy access by disabled residents. There is a small service and access road which branches off to serve the terrace homes and towers respectively. These will principally be used by disabled residents, bin lorries, and emergency vehicles. Deliveries will be consolidated with the provision of a delivery drop off locker point at the entrance to the site to prevent additional traffic through the site. The site is directly accessible via Pitfield Road from the North Circular which the Transport Statement identifies as having sufficient capacity to meet future transport demands generated as a result of development.

The proposal also includes a number of highways and public realm interventions to improve the area and make it more conducive to walking and cycling. This includes improved public realm, new walking and cycling paths and road crossings, and new wayfinding. The proposal will also serve to make the park feel safer, including through the provision of passive surveillance from the proposed units fronting the park and new sensitive park lighting.

The lack of on-site car parking will mean that suitable controls on residents' potential to own/ park cars on site and in the vicinity will be expected, this is likely to include restrictions within property leases, which will help to mitigate any adverse effects. Advice will be required from TfL on the impact on bus and underground network capacity, although in itself the development will not generate a significant amount of additional movements on that network.

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

Mitigation

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

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

Waste

Documentation Accompanying the Screening Request: An outline site waste management plan (SWMP), and operational waste management strategy have been provided.

Construction

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

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

Operation

Supporting information notes that waste will be collected and managed in accordance with all relevant legislation and guidance, and it is anticipated that operational waste will mainly comprise household and recyclable materials. The proposed commercial uses are not considered to give rise to unusual volumes of waste.

The decision notice should include suitable conditions to ensure that there is sufficient capacity for the scale of development. The SWMP should also be secured through a planning condition. With the implementation of these mitigation measures, no significant effects are anticipated.

Mitigation

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

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

Water Quality (hydromorphological changes, quantity and quality)

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

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

Construction

During the construction process there is the potential to affect water quality through accidental pollution events, such as fuel spills and increased sediment, as well as the contaminated material identified on site within surface water passing through to adjacent watercourses. The implementation of standard impact avoidance measures should be secured through the CEMP. With the implementation of standard impact avoidance measures to ensure that the site is adequately protected, no significant effects are anticipated. It is not considered, given the scale of the development and works proposed that there will be any significant effects on either water quantity or hydromorphology during construction.

Operation

There is the potential the operation of the proposed development to affect the foul and surface water capacity/quantity due to an increased demand. Whilst there may be an increase in demand, given the scale of the development, it is not considered to lead to significant effects. It is not considered, given the scale of the development and the implementation of SuDS (refer to Floor Risk section above) that there will be any significant effects on either water quality or hydromorphology once operational.

Mitigation

A CEMP should be secured that includes measures to protect against and deal with

accidental pollution events. The implementation and management of SuDS should be secured though a planning condition. This is normal practice for a major application.

Wind
Documentation Accompanying the Planning Application: A Wind Assessment has been provided (required for buildings 30m or more in height).

Construction

It is recognised that throughout the demolition and construction phase of the project, the cranes and the erection of the new structure may affect the local wind microclimate, however these effects are considered to be temporary and not anticipated to be significant.

Operation

The operation of the proposed development will introduce new buildings onto the site that will be up to 10 storeys (~34m) in height. Therefore there may be adverse effects on the existing wind conditions. This can be assessed throughout the normal planning process. Mitigation measures can be incorporated into the development to reduce the impacts on those within and adjacent to the development to acceptable levels.

As such it is not anticipated that the environmental effects will be of such significance to warrant EIA.

Cumulative Effects

The 2017 EIA Regulations requires the consideration of cumulative effects through interactions being the combined effects of individual effects arising as a result of the development and also with other existing development and/or approved development.

In relation to the cumulative effects of the interactions related to the proposed development, taking account of the analysis and commentary above it is not considered that the impacts are such as to be so significant to warrant EIA.

There are a number of major developments in the surrounding area that are likely to be built, as detailed in 'Large Scale Development within the Vicinity'. The proposal in association with these wider developments may have the potential for cumulative impacts. The impacts of this needs to be considered when determining if the effects would be so significant as to warrant EIA.

Documentation Accompanying the Planning Application: No specific documentation has been provided. The TVIA considers the cumulative impact of tall buildings, identifying that the proposal will be subservient to existing and proposed tall buildings nearby, and will assist in their stepping down to the local lower scale development.

Demolition/Construction

It is considered that no likely significant adverse cumulative construction effects will occur assuming the implementation of standard mitigation measures such as appropriate traffic management measures and construction routing; and maintenance of site hoardings and compliance with the mitigation measures detailed within the CEMP.

It is also assumed that the enabling works, demolition and construction phases associated with the other development schemes would adhere to legislative requirements, industry guidance and best practice as will be the case within the application sites. However, there remains the potential for cumulative effects to arise, particularly with respect to dust and noise. It is noted that this is the first phase of a potentially 3 phased masterplan which in total is to delivery ~400 units. The phasing of the proposed development will go some way toward mitigating against the potential for cumulative noise and air pollution, and therefore significant impacts are not considered likely in this respect.

The construction workers at the construction site of each individual cumulative scheme will have to adopt controls to prevent the significant transfer of airborne pollutants beyond their site boundaries and the use of monitoring to confirm the effectiveness of these measures. Therefore, cumulative effects at existing and future receptor locations would be appropriately managed by the contractors to avoid the occurrence of significant adverse cumulative effects. Cumulative effects during the enabling works, demolition and construction phase are therefore generally considered to be temporary, local and overall not significant.

Operation

With regards to the matters considered in this opinion it is not considered that there will be significant adverse cumulative operational effects when the cumulative developments and the proposed development are operational.

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