



Brent Civic Centre  
Engineer's Way  
Wembley  
Middlesex HA9 0FJ

TEL 020 8937 5230

FAX 020 8937 5207

EMAIL [paul.lewin@brent.gov.uk](mailto:paul.lewin@brent.gov.uk)

WEB [www.brent.gov.uk/localplan](http://www.brent.gov.uk/localplan)

12th October 2022

---

Dear Sir,

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

**Proposal:** Request for Screening Opinion as to whether an Environmental Impact Assessment is required for the proposed development to extend the existing JVC data centre to the east westward, incorporating 1.85ha of land at 717, 719, and 721 North Circular Road, and being delivered at 5 storeys.

**Site:** Land to the north of the North Circular Road, incorporating 717 to 721 North Circular Road, including additional land to the rear.

I write in connection to your screening request submitted on 23<sup>rd</sup> September 2022 by Maddox Planning on behalf of PDCG (Group) Ltd. Reference has been made to Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ("the EIA Regulations") "Requests for screening opinions of the relevant planning authority".

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](mailto: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:**

To extend the existing JVC data centre to the east westward, incorporating 1.85ha of land at 717, 719, and 721 North Circular Road, and being delivered at 5 storeys.

**Site:** Land to the north of the North Circular Road, incorporating 717b and 719 to 721 North Circular Road, including additional land to the rear.

*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**

Maddox Planning requested a screening opinion on behalf of PDCG (Group) Ltd. from the London Borough of Brent (the Council) on 23<sup>rd</sup> September 2022. Associated with this request, details of the site boundary, proposed development and an initial assessment of the potential impacts of the proposed development, along with appended Ecology, Noise, and Air Quality documents, were submitted.

**The Existing Site and Surrounding Area**

The existing site includes hardstanding car park and pedestrian access land which is perimetered by trees and associated with the existing JVC data store. West of this are land and buildings at 717b, 719 and 721 North Circular Road. There is a small amount of land to the rear of 717 which was previously occupied by a small industrial building, now demolished. Buildings at 719 are older industrial units and are largely dilapidated with the exception of the unit immediately fronting the North Circular Road. Whilst land at 721 is largely occupied by hardstanding, including a few small scale industrial buildings.

The site lies parallel to the North Circular Road (A406). To the north is Welsh Harp Site of Special Scientific Interest (SSSI), Site of Importance for Nature Conservation (SINC) and Local Nature Reserve and the associated River Brent. The site does not lie within what is known as the Impact Risk Zone (IRZ) for the SSSI, although it is located adjacent to it.

The North Circular Road (A406) is located to the south and there is a raised pedestrian walkway over the North Circular allowing for north-south access. Vehicular access to the site is via Priestly Way to the north from Edgware Road (A5). Within the Brent Local Plan the site is located within the designated Staples Corner Strategic Industrial Location (SIL), Staples Corner Growth Area (policy BEGA2) and a Tall Building Zone.

The site is not located within a conservation area and there are no listed buildings within the site's curtilage. The nearest two listed buildings are in excess of 0.5km from the site. These are the Welsh Harp Bridge across the reservoir (Grade II) and the Old Oxgate to the south (Grade II\*).

The character is predominantly industrial, particularly to the east and west. The closest residential properties are on Brook Road to the south-west across the North Circular

(approximately 300m) and to the north-east across the wooded area and River Brent at Woolmead Avenue (approximately 275m).

The site area for this screening request is 1.85ha resulting in a cumulative site area of approximately 3.6ha including the existing adjacent data centre site.

The site falls within Flood Zone 1 (fluvial), with small elements within Flood Zone 3a (surface water). The site is also located within an Air Quality Management Area.

### **The Size and Design of the Proposed Development**

The proposed development is for an extension to the existing data centre at JVC House and would comprise the following:

- The proposed extension will be five storeys in addition to a plant storey;
- The plant storey will include up to 70 chillers plus air handling units and extraction fans for temperature regulation;
- The proposals will include for up to 50 generators that will be used for standby power to the data centre in the case of an emergency power outage;
- The generators will be powered by hydro treated vegetable oil biodiesel;
- The generators will have planned testing for 30 minutes every month for ten months of the year plus four hours every six months;
- Generator testing will not be undertaken concurrently so as to minimize short term air quality impacts;
- Invertebrate boxes, beehives and pollinator poles will be incorporated where appropriate;
- The additional proposed site area is 1.85ha;
- The cumulative site area of the existing and proposed is approximately 3.6ha;
- The existing vehicular access will be used – construction and operation phases.

### **Information Provided in Support of the Request for a Screening Opinion**

The request for screening opinion has been submitted with a supporting statement and Location plan setting out an analysis of the likely environmental effects of the proposal. Appendices have also been attached comprising an Air Quality Technical Note, a Noise Technical Note, and a Preliminary Ecological Appraisal.

### **Previous History**

The site and nearby sites have significant planning history, including a number of non-material amendments and approval of details to application 20/1828. The following are relevant to this screening exercise.

<b>Location</b>	<b>Development</b>	<b>Council reference</b>
JVC Business Park	New warehouse distribution facility and ancillary office and workshop accommodation, a new office building, refurbishment of two existing warehouses and associated car-parking and landscaping.	04/1544
JVC House	Alterations and extensions to existing building to include roof plant and generator compound extension, external buildings to house sub-station, plant equipment and gate house, re-configuration of the car parking layout and provision of security fencing in association with its use as a data centre (Use Class B8).	20/1828

Location	Development	Council reference
JVC House	<p>Non-material amendment: - External stair core moved from the west façade to the south façade; - Additional external stair core on South façade; - Continuous louvre screen for roof plant increased in height and path amended; - Infill panels added above existing cladding increased in height; - Air handling louvres added to south façade; - Generator compound amended with screening increased in height; - Link bridge between offices removed and infill panels added to match existing on both facades; - External double doors on north elevation (first floor) removed; - Additional escape route added to north façade with ramp and stairs; - Escape route on east façade repositioned. Existing door to be infilled to match existing; - Escape route on south façade infilled; - Existing ramp to main entrance on north façade amended to be compliant; - Existing ramp on east façade now retained and gate added; - Fence line and type adjusted; - Existing roller shutter door on east faced replaced with double door; - Sprinkler tanks adjusted to be narrower and longer; - Parking arrangement amended; - Cycling spaces amended and added for existing office; - Gate house made smaller and relocated; - Entrance/Exit air lock gates changed to two lanes; - Additional gate added to southern exit onto north circular; - Internal layouts reconfigured; and - Roof layout altered. of Full Planning Permission reference 20/1828 dated 2 October 2020, for Alterations and extensions to existing building to include roof plant and generator compound extension, external buildings to house sub-station, plant equipment and gate house, re-configuration of the car parking layout and provision of security fencing in association with its use as a data centre.</p>	21/0417
JVC House	<p>Non-material amendment to change wording to condition 9 (substation) of Full Planning Permission reference 20/1828 dated 2 October 2020, for Alterations and extensions to existing building to include roof plant and generator compound extension, external buildings to house sub-station, plant equipment and gate house, reconfiguration of the car parking layout and provision of security fencing in association with its use as a data centre (Use Class B8).</p>	21/1532
721 North Circular Road	<p>Demolition of all existing buildings and redevelopment of the site to incorporate two new buildings comprising of B2 use, B8 use and ancillary commercial uses, alterations to the site entrance and access.</p>	20/1647
721 North Circular Road	<p>Redevelopment of the site to incorporate a new warehouse building with commercial floorspace (Use classes B1(b) + (c), B2 and B8) with the demolition of existing buildings occupying the site and alterations to the site entrance and access.</p>	19/0763

Location	Development	Council reference
719 North Circular Road	Demolition of two existing factories to rear of site, and the erection of a new industrial unit with ancillary offices, and provision for 18 parking bays and service area, subject to a Deed of Agreement dated 17/05/2005 under Section 106 of the Town and Country Planning Act 1990 (as amended).	05/0679

### 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:

Granted:

- 381A-D INC, 381-397 INC and 13-20 Park Parade Mansion, Edgware Road, Kingsbury, London, NW9 - Demolition of existing buildings and erection of a new mixed use building comprising commercial uses and residential units, with associated car parking, cycle storage, plant and shared external amenity space at first and fifth floor level with other ancillary works. Subject to a legal agreement dated the 2nd of July 2021. [ref. 17/2284, granted July 2021] No start on site.
- 1-8 Capitol Way (NEAT Developments) - 500 residential units, across buildings of 4-12 storeys. [Ref. 19/4545, granted June 2021]. No start on site.
- 1 Burnt Oak Broadway – Part 7/8 storey building to provide co-working space and purpose-built shared living units, and café. [Ref. 20/1163, granted subject to S106]. No start on site.
- Symal House, Edgware Road – prior approval change of offices into 45 self-contained studio flats. [Ref. 20/1311, granted June 2020]. No start on site.
- All Units at 4-9 INC, and garages rear 4-9 Gladstone Parade, Edgware Road. – 225sqm retail floorspace and hot food takeaway and 155sqm public house and 54 residential units. [Ref. 18/4777, granted December 2020]. Started on site.

Awaiting determination:

- 363 Edgware Road – 165 residential units with commercial use at ground floor. Buildings of 19, 17, 14, 8, 6, and 5 storeys. [Ref. 21/1124, awaiting determination].
- 403-405 Edgware Road - mixed-use development (24,712 sq. m GIA) incorporating 17 storey building and 3 basements, comprising: flexible light industrial (Class E)/B2/B8 employment space; Class C1 Hotel (including ancillary gym, spa and swimming pool); Class F.1 Conference Centre; Class F.2 community hub; basement car parking accessed from Oxgate Lane (providing 76 car parking spaces); cycle parking; internal service yard; coach drop-off lay-by; management and back of house areas; plant; roof garden and outdoor terraces; public realm improvements and associated works. [Ref 20/4143 awaiting determination]

The site is located along the A406 / North Circular and is therefore located approximately 400m from LB Brent's boundary with LB Barnet. As such, planning applications granted within the LB Barnet have the potential to incur cumulative impacts. The below are therefore included within this assessment.

- 100 Burnt Oak Broadway [LB Barnet] – 100 residential units, 1,718sqm of A1/D2 floorspace in a building of between 4 and 12 storeys. [Ref. 19/1049/FUL, granted April 2020]. Started on site.
- Brent Cross Cricklewood Regeneration Area - Comprehensive mixed use redevelopment of the Brent Cross Cricklewood Regeneration Area comprising residential uses (Use Class C2, C3 and student/special needs/sheltered housing), a full range of town centre uses including Use Classes A1 - A5, offices, industrial and other business uses within Use Classes B1 - B8, leisure uses, rail based freight facilities, waste handling facility and treatment technology, petrol filling station, hotel and conference facilities, community, health and education facilities, private hospital, open space and public realm, landscaping and recreation facilities, new rail and bus stations, vehicular and pedestrian bridges, underground and multi-storey parking, works to the River Brent and Clitterhouse Stream and associated infrastructure, demolition and alterations of existing building structures, CHP/CCHP, relocated electricity substation, free standing or building mounted wind turbines, alterations to existing railway including Cricklewood railway track and station and Brent Cross London Underground station, creation of new strategic accesses and internal road layout, at grade or underground conveyor from waste handling facility to CHP/CCHP, infrastructure and associated facilities together with any required temporary works or structures and associated utilities/services required by the Development (Outline Application). [Ref. F/04687/13, granted July 2014]. Started on site.

Awaiting determination:

- Brent Cottage - Redevelopment of the site comprising of a part 1, part 8 and part 9 storey building (plus a basement level) to provide 63 self-contained residential units and associated car parking; secure cycle parking; refuse and delivery bay; refuse storage; plant; landscaping and amenity space. [Ref. 21/2485/FUL, awaiting determination].
- 105 West Hendon Broadway London NW9 7BN - Demolition of the existing building and construction of a 6-storey building plus rooftop plant rooms comprising of 39 residential units (Class C3) with basement level car and cycle parking. Associated hard and soft landscaping, amenity space and refuse storage. [Ref. 21/4352/FUL, awaiting determination].

### **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) was adopted at Full Council on the 24<sup>th</sup> February 2022 and 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 site is however adjacent to an impact risk zone whereby the mechanism is for the LPA to liaise with Natural England at the planning application stage.

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

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

The proposed development includes more than 1 hectare of urban development which is not dwellinghouse development. With a proposed site area of 1.85ha, 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 include 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). 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 (NO<sub>2</sub>) and the 24 hour mean national objective for particulate matter (PM<sub>10</sub>).

There are a number of sensitive receptors in close proximity to the proposed development site, including businesses and ecologically sensitive receptors within the Brent Reservoir SSSI.

Documentation Accompanying the Planning Application: *Supporting information states that a standalone air quality assessment will be produced to accompany the planning application which will fully assess all potential air quality impacts associated with the Proposed Development (including cumulative impacts with committed developments where relevant) and outline any recommended mitigation measures.*

### **Construction**

Machinery used during construction can generate new sources of emissions, as well as traffic movements to/from the site and the works themselves. When assessing the effect of dust emissions generated during construction works, receptors are defined as the nearest potentially sensitive receptor to the boundary of the site in each direction. These receptors have the potential to experience effects of greater magnitude due to emissions of particulate matter generated by the works, when compared with more distant receptors.

The receptors in close proximity to the site, combined with the new emissions, means that there is the potential for adverse effects as a result of the construction 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. Taking account of these practices the effect of dust soiling and PM<sub>10</sub> is likely to be reduced to negligible with the implementation of appropriate mitigation measures. These may include: No idling vehicles; Erect solid screens or barriers around dusty activities or the Site's boundary; Loads entering and exiting the Site are covered; Where practicable use mains or battery powered generators over fuel burning; Other dust suppression measures e.g. damping down with water; and all constructions vehicles and equipment to comply with relevant EU stage ratings. 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 and impacts are considered to be temporary.

### **Operation**



The proposal includes 50 hydro treated vegetable (HVO) biodiesel generators that will be used for standby power to the datacentre in case of an emergency outage. The generators are expected to be used for testing for a period of 30 minutes every month (for 10 months) and for four hours every six months and during any unplanned power outages at the datacentre. The potential air pollutants of concern at operational stage are associated with the HVO generators and traffic generated by users of the proposed development.

In relation to the HVO generators, supporting information states that testing of the standby HVO generators will be undertaken as part of the Air Quality Assessment, and impacts assessed at human and ecologically sensitive receptors. Supporting information suggests that emissions are likely to be dispersed to the north and the east of the site, with the nearest sensitive receptors being the ecologically sensitive Brent Reservoir SSSI and further away residential receptors at Woolmead Avenue. A standalone Air Quality Assessment will be submitted with the proposed planning application and impacts from the proposed plant will be assessed using ADM-5 dispersion model which will identify any potentially significant air quality impacts and appropriate mitigations will be proposed.

In relation to traffic generation, supporting information states that the existing carpark will be reconfigured, but it is not clear how many replacement parking spaces will be provided and as such whether there will be a net gain or loss of parking spaces. Additionally it is not clear how many jobs will be generated by the proposal and as such how much additional traffic may be generated by workers. However, supporting information states that the end use of the proposed development is not anticipated to generate a high level of trips and the majority of these trips are likely to be workers. Operational phase road traffic will be assessed against the EPUK/IAQM screening criteria and if this is exceeded a detailed assessment using ADMS-Roads will be undertaken. Taking this into account the level of net traffic generation resulting from this development is likely to be negligible compared to the previous use and not considered to be significant.

It should also be noted that as the proposal is within a Growth Area, emerging policy requires the development to be air quality positive. The Council is likely to seek technical reports that show how an air quality positive development can be achieved in line with emerging Air Quality Positive London Plan Guidance.

Consideration also needs to be given to the potential effects on the new internal receptors given the location for the proposed development adjacent to in part to a relatively heavily trafficked road and within an AQMA.

## Mitigation

As the proposal is within a Growth Area, emerging policy requires the development to be air quality positive.

During the construction phase a CEMP should be implemented which implements suitable measures to reduce the impact of dust and emissions. This can be secured via planning conditions.

At operational stage, generator testing will not be undertaken concurrently so as to minimise short term air quality impacts. Appropriate mitigations will be required as identified by the Air Quality Assessment in relation to the proposed HVOs.

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.

For the operational phase, suitable mitigation to be secured through a planning condition to ensure that new internal receptors are adequately protected.

Suitable conditions associated with the Transport Statement and Travel Plan and measures to reduce reliance on the private car, for example through provision of sufficient cycle parking will ensure reductions in impact through vehicle movements.

### **Local Heritage**

Documentation Accompanying the Planning Application: *The screening request has not been accompanied with any specific reports in relation to local heritage. However, supporting information notes that the nearest heritage features are some 0.5km from the site. Given the existing context and the scale of the proposal it is not envisaged it should impact on skyline and protected views, however, this should be addressed in a Design and Access Statement submitted as part of a future planning application.*

The Site does not lie within or near a Conservation Area or an Archaeological Priority Area and as noted above the nearest heritage features are some 0.5km from the site. It is considered that views are likely to have limited impact and are not likely to push the proposal into EIA development.

The site has already been subject to significant urban development and can be considered to have a generally low archaeological potential for all past periods of human activity. Past post depositional impacts are considered severe as a result of previous development. On the basis of the available information no further archaeological mitigation measures are recommended in this particular instance.

The Council considers that given the scale of the development and the urban nature of its location the proposed development would not lead to significant adverse environmental effects on heritage assets, as such an EIA is not required in respect of heritage and cultural impacts. It is important to note that whilst the effects are not considered to be significant in relation to the EIA Regulations, this does not preclude the Council from taking into account the adverse effects (and their acceptability) when determining the planning application.

### **Mitigation**

During construction, ensure the erection and maintenance of hoarding.

### **Climatic Factors**

Documentation Accompanying the Planning Application: *The screening request has not been accompanied with any specific reports in relation to climatic factors, though supporting information states that there will be no risk of accidents caused by climate change and that the location is not susceptible to adverse climatic conditions. An Energy Statement and Sustainability Statement should be submitted as part of the planning application process.*

### **Construction**

Emissions from construction traffic and plant can contribute towards the region's greenhouse gas emissions. The materials used also include a large quantity of embodied carbon. 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. This should include achievement of net zero carbon in accordance with policy SI2 of the London Plan.

#### Operation

The Energy and Sustainability Statement(s) submitted as part of a planning application will need to demonstrate how the proposed development meets existing building regulations and planning policy standards. This should be through actual reductions in carbon emissions, combined with financial contributions where necessary. The provision of the above mentioned achievement of net zero carbon development in accordance with London Plan policy will go some way in achieving these outcomes. The effects of which are beneficial, but are not considered to be significant.

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

Taking account of the above the Council does not consider that the environmental impacts related to climate change are significant enough to warrant EIA.

#### **Contaminated Land**

*Documentation Accompanying the Planning Application: A Preliminary Land Contamination Risk Assessment should be submitted as part of the planning application process. This should assess the potential effects of the proposed development and if necessary the need for further ground investigations to support a remediation strategy report with mitigation measures to deal with any residual effects.*

Although supporting information states that the nature of works would not result in the release of pollutants or present a risk to contamination of land or water and that the site is not on any contaminated land register, the site is located within an historically industrial area. Based on the site's historical use, there is the potential for sources of contamination related to its and the surrounding land uses. To ascertain the likely level of contamination, a Preliminary Land Contamination Risk Assessment would be required to be submitted with a planning application.

#### Construction

During construction there is considered to be a low likelihood of fuel leakages / spills from construction vehicles. A CEMP would be implemented to manage potential effects. In addition there is the risk of exposure to contaminated materials and opening up pathways to underlying substrata. Standard mitigation measures will be required during the construction of the proposed development, to ensure that the works are undertaken in an appropriate manner. These should be secured through conditions in agreement with the Council's Contaminated Land Officer. With the implementation of these mitigation measures, no significant effects are considered likely.

#### Operation

With the implementation of any required impact avoidance measures as part of the construction phase, no significant effects are anticipated at operation.

#### Mitigation

Standard construction mitigation measures should be secured through the CEMP and through conditions in agreement with the Council's Contaminated Land Officer.

Taking into account the above the contamination issues are not so significant as to warrant and EIA.

#### **Daylight, Sunlight and Overshadowing**

Documentation Accompanying the Planning Application: *None*.

The SSSI is a sensitive receptor in close proximity to the proposed development site.

#### Construction

During construction, there may 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 buildings 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 current building is approximately 3 storeys in height. The proposed development will result in a building of 5 storeys in addition to a plant storey. Given floor to ceiling heights in data centres vary, there is the potential for this to fall within the category of being a 'tall building' as defined in the Brent Local Plan Policy BD2 of greater than 30 metres above ground.

The building proposed might have the potential to affect sunlight to sensitive neighbouring uses at certain times of the year due to its proximity to sensitive receptors. Given the distance from receptors and the site's urban location and duration of impact, the effects are not considered to be significant.

With respect to onsite receptors the building will sit within a context where tall buildings are not currently prevalent or in close proximity which could impact on sunlight and daylight available to the development. Whilst the site is within a tall building zone, any proposal for a tall building will need to be supported by a Daylight and Sunlight Assessment to fully assess the impact on its surroundings. Moreover, given the site is bounded by the North Circular and Welsh Harp it is considered there is limited scope for tall buildings in close proximity to the Site. As such, significant effects are not considered to be likely.

#### Mitigation

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

Taking account of the above it is considered that the environmental impacts in relation to daylight, sunlight and overshadowing would not be so significant to warrant EIA.

## **Biodiversity (including flora and fauna)**

Documentation Accompanying the Planning Application: *A Preliminary Ecological Appraisal (PEA) and Phase II Bat Survey will be submitted as part of the planning application process and have been attached as an appendix to the screening request. The PEA notes that a Biodiversity Impact Assessment is being undertaken.*

The site is located adjacent to Brent Reservoir SSSI and Local Nature Reserve (LNR). Last assessed on 20<sup>th</sup> March 2019, Brent Reservoir was identified as being in favourable condition, having a good breeding bird assemblage on the open water and fen habitats across the site. Brent Reservoir is also a SINC. The PEA also notes UK BAP habitat Open Mosaic Habitat on Previously Developed Land on site and Lowland Mixed Deciduous Woodland immediately to the north of the site.

Supporting information also states that there is high value foraging and moderate roosting potential for bats, high moderate nesting bird potential, and confirmed presence of s41 priority invertebrate species cinnabar moth caterpillars. The phase II Bay Survey has identified that there were no emergences of bats in the identified high value bat roosting locations, and that in general, they were exhibiting low commuting behaviour within that area. The final results and recommendations, following an additional survey day, will accompany any forthcoming planning application.

### **Construction**

The Preliminary Ecological Appraisal notes that given the close proximity of the site to Brent Reservoir SSSI and LNR, proposals should embed measures which address potential impacts of pollution during construction. These could be described within a CEMP.

Depending on the findings of the Preliminary Ecological Assessment / Biodiversity Report, a range of standard mitigation measures may be required to reduce potential adverse impacts on biodiversity, such as timing of demolition/ construction activities, relocation of bats and controls on lighting.

There is a potential risk of water contamination from run off during demolition and construction. The potential for contamination risk should be dealt with through the implementation of appropriate mitigation in the demolition and construction phase (to be secured by standard planning condition). It is not considered that the construction of the proposed development will have a significant effect on the integrity of statutory or non-statutory nature conservation designations or protected species and the potential for conservation requirements and objectives would not be diminished.

### **Operation**

The existing site comprises hardstanding / car parking associated with the existing building, and works buildings, hardstanding and scrub land at 717-721 North Circular Road.

Supporting information notes that the development provides opportunities to incorporate ecological features and provision of new habitats that would encourage species to the site, which could be included within EMP documents and secured through planning condition.

The Preliminary Ecological Appraisal (PEA) makes recommendations such as habitat provision, wildlife-friendly landscaping, vertical greening, garden bird boxes, bat boxes, and invertebrate habitat features. It is also noted that a Biodiversity Impact Assessment is being undertaken to ascertain how the development proposals perform with regards to national policy in relation to the delivery of Biodiversity net gain.

Supporting information states that measures will be put in place including wildlife friendly landscaping, biodiverse roofs and invertebrate features, as informed by the PEA. This would ensure that any potential impacts will be minimised, mitigated and or compensated for during the operational phase.

There is therefore the potential for the proposed development to contribute to biodiversity of the local area through the implementation of ecological enhancement measures. Whilst this is considered to be beneficial, this is not considered to be significant.

### Mitigation

Suitable conditions should be in place to ensure potential adverse impacts on any existing protected species are minimised during prior to and during works on site, as well as incorporation of suitable features to encourage bio-diversity resources as part of the development. The potential for contamination risk should be dealt with through the implementation of appropriate mitigation in the demolition and construction phase (to be secured by standard planning condition). Mitigation measures and compliance with regulatory waste disposal controls and hazardous material management would be set out in a CEMP. The PEA also recommends that an Ecological Management Plan be introduced and implemented.

Key standard mitigation, compensation and enhancement actions are described within the Preliminary Ecological Appraisal to enable legislative and policy compliance and ensure that potential impacts are fully mitigated or minimised. These measures include recommendations of timing of works, wildlife friendly landscaping, biodiverse roofs and invertebrate features.

Taking account of the above no significant environmental effects should arise which would require the need for an EIA.

### Flood Risk

Documentation Accompanying the Planning Application: *In line with government guidance, a Flood Risk Assessment will be required to be submitted to support any future planning application as the development is more than 1ha.*

The site is located to the south of the River Brent and Brent Reservoir, and is within Fluvial Flood Zone 1. A small element of the site is located with Flood Zone 3a for surface water flooding.

### Construction

Given the scale of the development and the site's location within Fluvial Flood Zone 1 and a small element in Flood Zone 3a (surface water), the construction of the proposed development is not considered to significantly affect flood risk.

### Operation

The proposed development site is located in an area at low risk of fluvial flooding (Flood Zone 1), and a small element of the site is located within Flood Zone 3a (surface water flooding). The existing site is largely hard standing. Supporting information states that due to the nature of the proposals and due to the fact that the site is previously developed and identified for industrial use, no significant alterations to volume and run-off are envisaged. Surface water outfall will, consistent with the Local Plan, need to be at greenfield run off

rates utilising appropriate sustainable drainage systems (SuDS), reducing the potential for flood risk off site.

The above potential flooding impacts are likely to be appropriately dealt with by the proposed development and are not considered to be of such significance that they warrant EIA.

### Mitigation

The implementation and management of on-site water attenuation and any potential flooding mitigation should be secured through appropriate placement and design of buildings, surface water drainage and sewerage accompanied with where necessary an associated planning condition.

### 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 utilise previously-developed brownfield land to provide a proposed extension to the existing building and associated generators, and re-configuration of the existing carpark.

This is not considered to generate any significant effects. 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 Technical Note has been attached as an appendix to the screening request. A Noise Impact Assessment, including Vibration Assessment, will be submitted with the planning application for the proposal.*

The North Circular (A406) and existing commercial and premises to the east and west are the current dominant sources of noise in the area.

The closest noise sensitive residential receptors are on Brook Road to the south-west across the North Circular (approximately 300m) and to the north-east across the wooded area and River Brent at Woolmead Avenue (approximately 275m). The Brent Reservoir is to the north of the site, which can offer opportunities for quiet recreation.

## Construction

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

Given the scale of the development, standard impact avoidance measures can be implemented to reduce emissions from construction activities, which will be secured through the CEMP. In the context of traffic movements around the site, the level of construction vehicle movements will not be exceptional. No significant effects are therefore anticipated.

## Operation

With the exception of disabled parking no car parking is proposed on site. There are likely to be The submitted supporting information does not state how much traffic will be generated by the development, however, it states the data centre does not generate excessive traffic due to its very nature – the end use of the proposed development is not anticipated to generate a high level of trips and the majority of trips are likely to be workers. As such, there is not considered to be any significant effects from traffic noise.

There will be a plant on site, including 50 HCO generators for standby power, 70 chiller units, air handling plant and extract fan. However, 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.

No significant effects are therefore anticipated.

## Mitigation

Adherence to the CEMP should be secured through a planning condition, the CEMP will include standard mitigation measures to reduce noise emissions. Plant noise (if applicable) should be controlled to local and national guidelines using a planning condition.

Suitable mitigation will be required to be included within the design of the proposed development to ensure that new internal receptors are adequately protected.

Taking account of these matters it is considered that the development will not have significant effects that warrant the need for EIA.

## **Socio-Economic (including population)**

*Documentation Accompanying the Planning Application: No discipline specific documentation of consideration has been given toward socio-economic impacts. This should be further considered going forward. The Planning Statement and Statement of Community Involvement might give an indication of current land use and number of jobs within the site and compare this with what is proposed.*

## Construction

The proposed development would create benefits to local employment though providing temporary employment during construction, with an associated increase in spending in the local and regional area. This is considered to be beneficial, but not significant.



## Operation

The proposed development could create benefits to local employment through providing additional employment once operational through the extension of the existing data centre site. However, it is not clear from the information submitted whether this will result in the creation of additional jobs. Regardless of whether there will be an increase or decrease in the amount of local employment provided, in the context of the local economy impacts are not likely to be significant.

Data centres have a high energy demand. This has the potential to impact upon local access to electricity, particularly for new large scale housing developments coming on stream in the local area when demand is significantly above the capacity previously identified as being available for development. This has been shown to delay the delivery of such developments, and thus the meeting of pressing housing targets, within the west London area. The applicant has identified that the design of the extension has taken this into consideration, and that the extension will operate within the existing capacities available to the site. Therefore potential for adverse associated socio-economic impacts upon the existing network and community from power supply issues are considered to be negligible and not significant.

S106 planning obligations will be sought to offset the effects of the development, if appropriate. These financial contributions will mitigate adverse effects, so that significant effects are unlikely.

## Mitigation

Financial contributions through S106 planning obligations will be sought to mitigate the effects of increased population/ users, if appropriate. Taking account of these matters it is considered that the development will not have significant effects that warrant the need for EIA.

## **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 unusually 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 Planning Application: *Brent local validation requirements require a TV / Radio Reception Assessment to be submitted at planning application stage for*

*tall buildings (30m high or taller) or for proposals that are significantly taller than their surroundings.*

On the basis of the information submitted, it is considered that there is no known significant likelihood at this stage, of detrimental effects from or on telecommunications that would warrant the submission of an EIA.

### **Townscape and Visual Impact**

*Documentation Accompanying the Planning Application: A Design and Access Statement will be required to be submitted to support any future planning application.*

The site does not lie within a London View Management Framework strategic view, nor within Brent's protected viewing corridors of the National Stadium Wembley, or within the protected viewing corridors of neighbouring boroughs. Potentially parts of the site could benefit from a high quality outlook across the Welsh Harp.

#### 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

Supporting information does not state the exact height of the proposed development, but states that it will be five storeys high plus a plant storey. It might fall within the definition of a tall building (30+ metres in height). Given the scale of the development and the nature of its location within an industrial area, significant effects are not considered likely in EIA terms.

As such it is important to note, that whilst the effects are not considered to be significant in relation to the EIA Regulations, this does not preclude the Council from taking into account the adverse effects (and their acceptability) when determining the planning application.

#### Mitigation

During construction, ensure the erection and maintenance of hoarding. Design, height and massing to reduce potential for adverse impact.

Taking account of these matters it is considered that the development will not have significant environmental effects that warrant the need for EIA.

### **Traffic and Transport**

*Documentation Accompanying the Planning Application: A Transport Statement including Travel Plan will be required to be submitted with any proposed planning application, in addition to a Servicing and Refuse Management Plan.*

The site has a PTAL of 1b/2 (Current and 2031 estimate). The potential West London Orbital station at Brent Cross West will increase PTAL.

National Highways (formerly Highways England) has identified that development in Staples Corner Growth Area should not significantly impact on the operation of the M1 motorway.

## 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. Supporting information states that construction works will be controlled via a CE/TMP. It is considered that any adverse effects can be mitigated through this.

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

## Operation

The submitted supporting information does not state how much traffic will be generated by the development, however, it states the data centre does not generate excessive traffic due to its very nature – the end use of the proposed development is not anticipated to generate a high level of trips and the majority of trips are likely to be workers.

The proposal involves the re-configuration of the existing car park. The proposed location plan submitted as part of the supporting information shows approximately 50 parking spaces and 3 servicing spaces. This appears to be a reduction on the current level of parking, which is approximately 40 parking spaces for the data centre and 100 for the offices. Given the information submitted, it is likely that any net change in parking spaces or operational traffic effects of the proposals are likely to be negligible, and not enough to warrant an EIA.

The Transport Statement and Draft Travel Plan and Servicing and Refuse Management Plan will set out how the site would be serviced when operational, which is consistent with an approach agreed with the local highway authority.

## Mitigation

A CLP should be secured that includes standard mitigation measures to control transport movements (potentially as part of the CEMP).

Controls on occupants and financial payments should be sought to offset operational effects.

As such no significant environment effects are anticipated to require EIA.

## Waste

*Documentation Accompanying the Planning Application: A Servicing and Refuse Management Plan will be required to be submitted as part of the planning application process. This should provide an analysis of how the development will adequately cater for the storage and collection of commercial waste during its operation will be sought. A CEMP will be sought as part of the planning process to deal with demolition and construction waste matters. A Waste Management Plan should be submitted to ensure appropriate disposal of waste during construction phase.*

## Construction

Supporting information states that waste will be generated in the construction phase, but that it is unlikely to be significant other than that normally associated with such an urban development. The supporting information states that the depositing of the waste could be recycled where appropriate and disposed of at a licensed site.

The implementation of standard impact avoidance measures will reduce waste from construction activities, which can be secured through the CEMP. No significant effects are therefore anticipated.

#### Operation

As above, the supporting information states that there will be the production of waste when the development is operational, but that it is unlikely to be significant other than that normally associated with such an urban development.

The decision notice should include suitable conditions to ensure that there is sufficient capacity for the scale of development. A Site Waste Management Plan (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 CEMP which will include standard mitigation measures should be secured through a planning condition for construction phase, as well as one that seeks to ensure appropriate disposal of waste during construction phase. The Waste Management Plan will ensure adequate measures for waste management are in place prior to and during occupation

#### **Water Quality (hydromorphological changes, quantity and quality)**

Documentation Accompanying the Planning Application: *This matter will be addressed in a number of areas, Flood Risk Assessment, Land Contamination Assessment, and the CEMP that will be required as part of the application/ permission process.*

The northern part of the site is located approximately 60m from the River Brent at its closest point and 50m Brent Reservoir. There is therefore potential for run-off direct from the site via the surface water drainage network. In addition the site is located on an historic industrial site, meaning potential for various compounds that could adversely affect water quality such as hydrocarbons within the ground if disturbed.

#### 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.

The PEA submitted with the screening request notes that due to the site's proximity to the Brent Reservoir SSSI, to avoid indirect impacts of increased pollution such as sediment run off, a CEMP should be secured through a planning condition that will detail measures required in regard to pollution and drainage 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 / coaches 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 implementation of SuDS (refer to Flood 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 Preliminary Land Contaminated Risk Assessment will identify if and where contamination is present and measures required to ensure that any construction activity does not increase risk to water quality will be secured through planning condition. The implementation and management of SuDS and associated pollution control mechanisms for surface drainage should be secured through a planning condition.

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

## Wind

Documentation Accompanying the Planning Application: *No information provided in the supporting information as to whether a Wind Microclimate Assessment will be provided. However, local validation requirements only require such an assessment on applications that include tall buildings of 30m or more in height or any other proposal where the development is likely to have an adverse effect upon the wind microclimate.*

## 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 proposal comprises an extension to an existing building, with a height of five storeys plus plant storey and generators. Although the exact dimensions of these have not been submitted within the supporting information, it is unlikely that these would be of such a height that could result in environmental effects (in terms of wind microclimate) that would be of such significance to warrant EIA.

It is important to note that whilst the effects are not considered to be significant in relation to the EIA Regulations, this does not preclude the Council from taking into account the adverse effects (and their acceptability) when determining the planning application.

## 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 need to be considered when determining if the effects would be so significant as to warrant EIA.

The Council has considered a wide area consisting of Staples Corner Growth Area and other development sites adjacent or within the vicinity, particularly those that might generate transport movements along the North Circular Road. One of the applications identified (Brent Cross Cricklewood Regeneration Area, F/04687/13) as part of the cumulative assessment was subject to Environmental Impact Assessment. The Council has considered the information contained within this assessment related to the individual impacts and also the associated cumulative impacts of the proposals.

#### Demolition/Construction

The Environmental Statement submitted under F/04687/13 identified negative impacts were likely in relation to noise during the demolition and construction phase. Impacts were identified to existing sensitive receptors (mostly residents) bordering the Site, and as the scheme progresses, at residential phases that have become occupied. No noise impacts were identified to Staples Corner or adjoining residential areas to the west of the A5.

In terms of transport impacts, the Environmental Statement identified potential impacts on road users as a result of additional construction related traffic. Due to the scale of the Brent Cross West development, there is potential for its construction to interact with the JVC development when being built out. Both schemes are subject to a CTMP. The CTMP will make it incumbent on the applicant to provide measures to minimise the impacts of the construction, taking into account existing permissions.

In line with this, 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.

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

The Environmental Statement submitted under F/04687/1 identified positive impacts were likely in relation to socio-economic impacts, landscape and visual impacts and water resources and flooding during the operational phase. This was due to jobs generated, enhancements to the existing townscape, new habitats being created, and restoration work to the River Brent.

Whilst the proposal will result in additional traffic on the roads, the Environmental Statement anticipated benefits to arise owing to the enhancements to the public transport network including the creation of a new Thameslink Station. The scheme was subject to a Transport Assessment and modelling agreed with TfL and the LB Barnet. This took into account the baseline and committed development in the surrounding area. The existing traffic on the road network was combined with the traffic anticipated to be generated from the future traffic growth. As such, the modelling accounted for a degree of growth in the surrounding area, and this informed the mitigation strategy.

The Environmental Statement states whilst there will be an increase in CO<sub>2</sub> emissions in the short term, all buildings will be built in accordance with the building regulations prevalent at the time of construction. Given the Government's intention to the progressive tightening of the Building Regulations, the CO<sub>2</sub> emissions reduction of the energy strategy is likely to prove to be conservative.

It considered that the proposed development would not give rise to any significant environmental effects that cannot be mitigated through the relevant pre-commencement conditions, or through the implementation of appropriate mitigation measures attached to the Permission.

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 and other funding streams from Government and service providers will address capacity issues that might exist in relation to on and off-site infrastructure.