LAND TO THE NORTH OF THE NORTH CIRCULAR ROAD (A406) INCORPORATING 717 TO 721 AND LAND TO THE REAR, LONDON, NW2 7BA

Environmental Impact Assessment Screening Report

PDCG (Group Services) Limited

Final
October 2022

CONTENTS

1. INTRODUCTION

1.1. This Report has been prepared by Triptych PD Limited on behalf of PDCG (Group Services) Limited in relation to the proposed extension to the existing data centre at the adjacent JVC House. The address for the extension is land to the north of the North Circular Road (A406) incorporating numbers 717 and 721 and the area to the rear ('the site'). Further details of the proposed development are given in Chapter 3 of this Report.

1.2. The Report is submitted to Brent Council ('the Council') to formally request it adopts a Screening Opinion in accordance with Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as last revised in December 2020) *i.e.* whether the proposed development is environmental impact assessment (EIA) development as defined by those Regulations.

1.3. In accordance with Regulation 6(2)(a), drawing number 00100 P1 is enclosed (Appendix TPD1) as a plan sufficient to identify the land. Included within this Report is a description of the nature and purpose of the development and a brief description of its possible effects on the environment as also required by the Regulations.

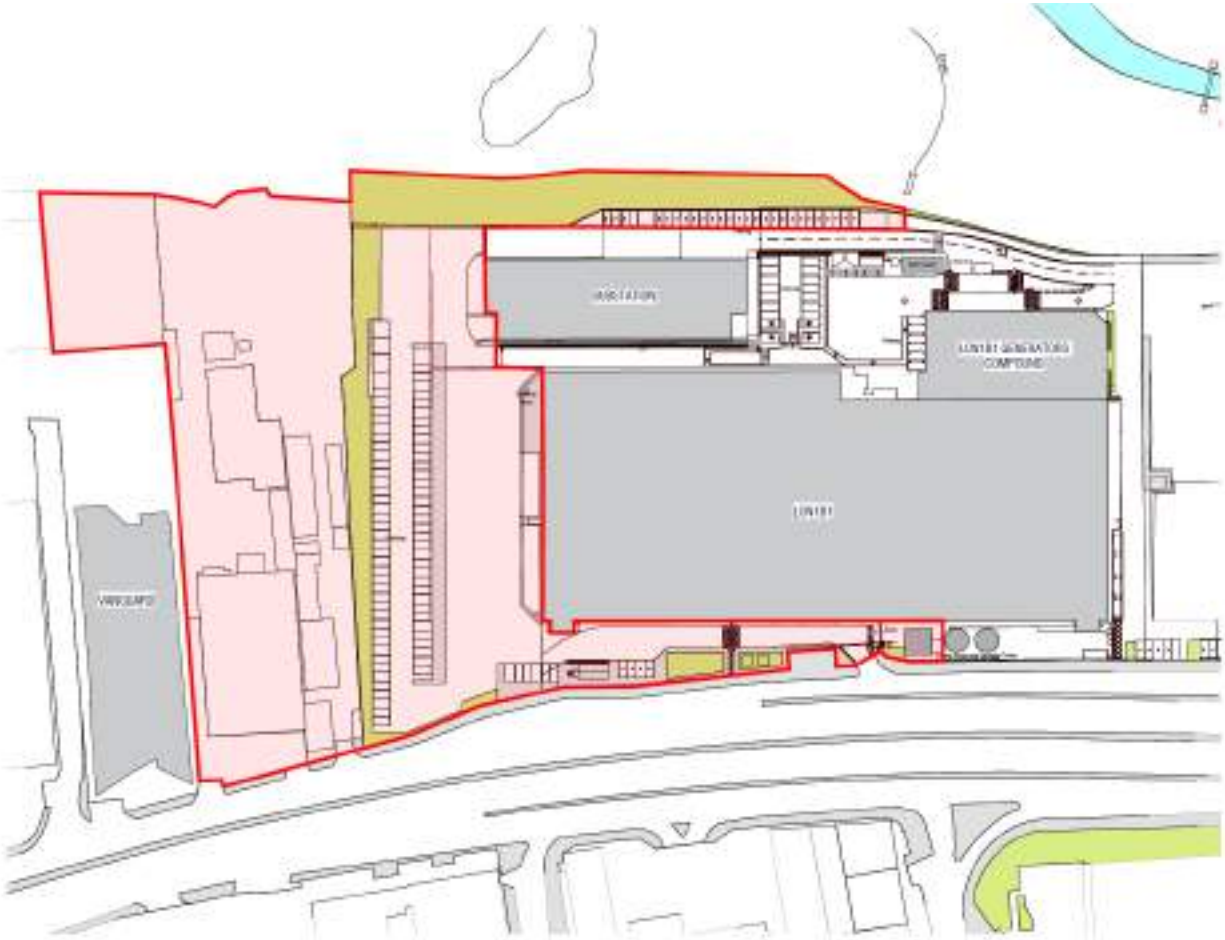
1.4. The remaining structure of this Report is as follows:

- Description of the site and surroundings;
- Nature and purpose of the proposed development;
- The EIA Regulations;
- Appraisal of Schedule 3 criteria by use of a screening checklist/matrix; and
- Conclusion.

2. DESCRIPTION OF THE SITE AND SURROUNDINGS

2.1. The site, generally, is within a developed urban area with industrial 'big box' buildings. It lies to the immediate north of the North Circular (A406) then beyond a wooded area to the north is the Brent Reservoir – a Site of Special Scientific Interest (SSSI) - and associated River Brent. The North Circular is a significant feature to the south at six lanes plus two either side for slip roads. There is a raised pedestrian walkway over the North Circular allowing for north-south-north access. Vehicular access is via Priestley Way to the north from Edgeware Road (A5). 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 – shown to the east on Figure 1.

Figure 1: Proposed site bounded and shaded in red shown in wider context (NTS, north to top)



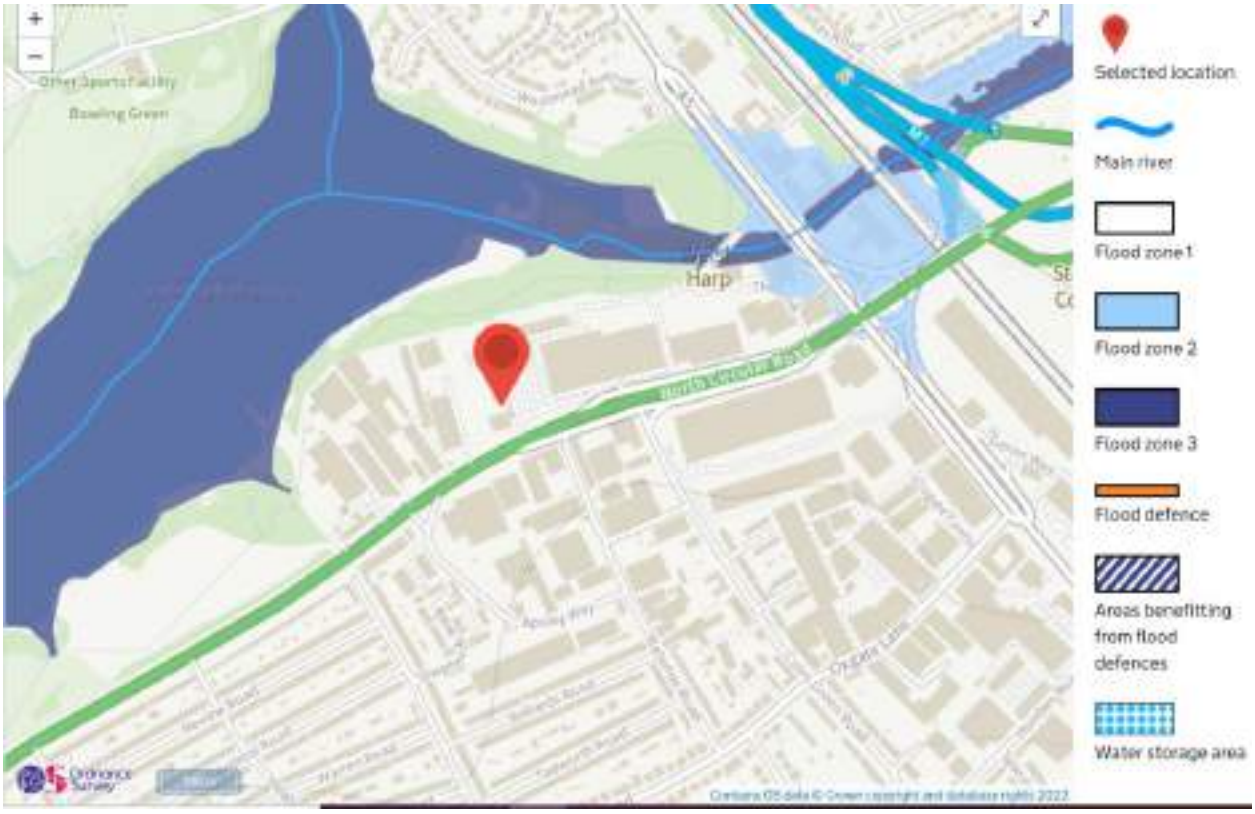
Source: Scott Brownrigg

2.2. As stated, the character is predominantly industrial particularly to the east and west. The closest residential properties are on Brook Road to the slight 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).

ENVIRONMENTAL, LANDSCAPE AND HISTORICAL DESIGNATIONS

2.3. The site lies in Flood Zone 1 with a low risk of flooding and therefore has a low probability of flooding as shown in Figure 2. In addition, there is a no risk of the site flooding from rivers and the sea. There is a risk of flooding from surface water is a small portion of the site. However, this is predominantly given the lower ground level of this section and can be designed to address.

Figure 2: Flood Map for Planning

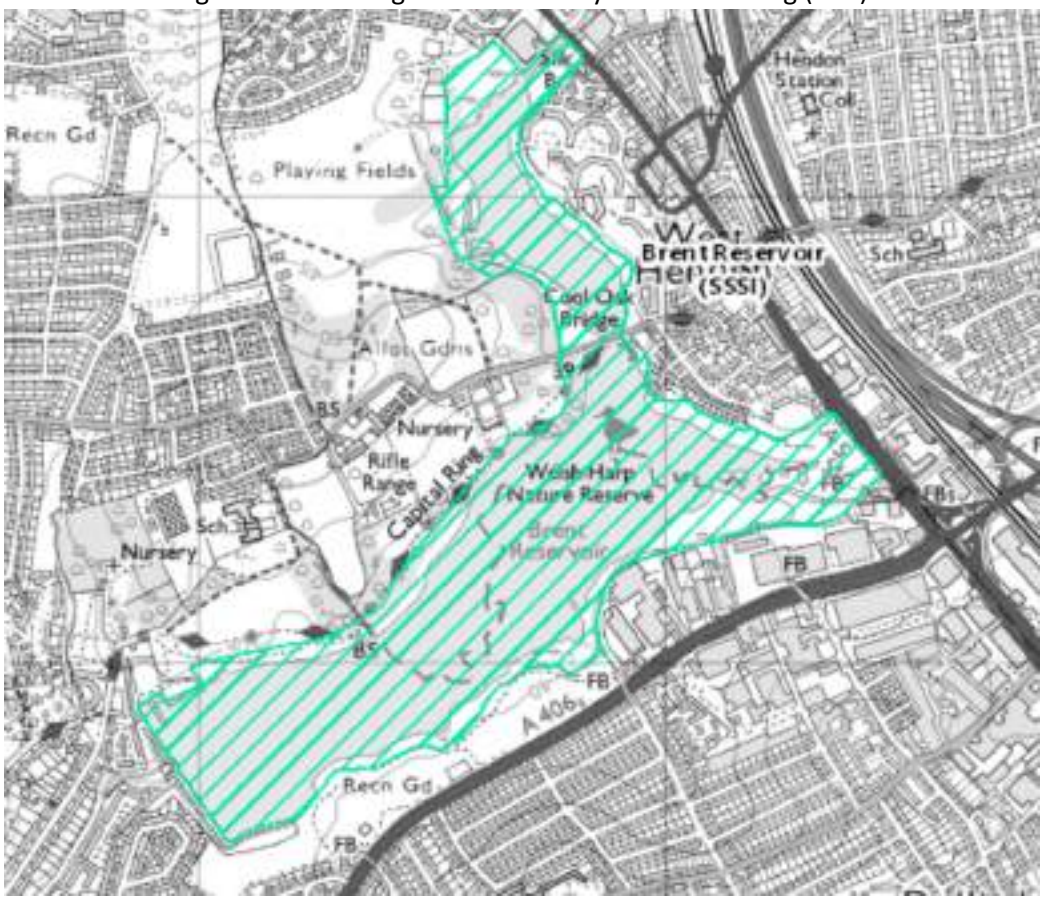


Source: https://flood-map-for-planning.service.gov.uk

2.4. Appendix TPD2 contains a specific technical note for this screening request in relation to air quality. It confirms that the site is located within the Brent Air Quality Management Area (AQMA) declared by Brent Council for specific exceedances of NO_2 (nitrogen dioxide) and PM_{10} (fine particulates) in Air Quality Objectives (AQO) as required by the Environment Act 1995 (Part IV).

2.5. As stated in paragraph 2.1, Brent Reservoir incorporating the Welsh Harp Nature Reserve, which is located to the north of the site is a SSSI. This is of relevance to this screening request given that a SSSI is defined as a 'sensitive area' within the Regulations. It is confirmed that the site does not fall within the designation. Figure 3 identifies the boundary of the SSSI.

Figure 3: SSSI Designation Shown by Green Hatching (NTS)



Source: MAGIC (defra.gov.uk).

2.6. The site does lie within what is known as the Impact Risk Zone (IRZ) for that SSSI. IRZs are a GIS tool developed by Natural England to make a rapid initial assessment of the potential risks to SSSIs posed by development proposals. These define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal, which could potentially have adverse impacts. Local planning authorities (LPAs) have a duty to consult Natural England before granting planning permission on any development that is in or likely to affect a SSSI. The SSSI IRZs can be used by LPAs to consider whether a proposed development is likely to affect a SSSI and determine whether they will need to consult Natural England to seek advice on the nature of any potential SSSI impacts and how they might be avoided or mitigated. Consequently, it is critical to understand the SSSI designation – in this instance it is of interest primarily for breeding wetland birds and in particular for significant numbers of nesting great crested grebe. The diversity of wintering waterfowl and the variety of plant species growing along the water margin are also of special note for Greater London[1]. Consideration of this matter is within Chapter 5.

[1] 1003322 (naturalengland.org.uk)

2.7. In terms of historical designations, 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*). Given the distance and nature of the proposed development including the intervening existing development/landscape, these need not be considered further.

Figure 4: Blue Triangles Show Locations of Nearest Listed Buildings

Source: Historic England - Championing England's heritage | Historic England

3. NATURE AND PURPOSE OF THE PROPOSED DEVELOPMENT

3.1. As set out broadly in Chapter 1, the proposals are for an extension to the existing data centre at the adjacent site that accommodated JVC House. The proposals will provide additional data halls with associated generators alongside the re-configuration of the car parking layout, in association with its use as a data centre.

3.2. The following principles of development will allow for the Council to adopt a Screening Opinion at this pre-application stage:

- 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 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 hydrotreated 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, garden bird boxes, beehives and pollinator poles will be incorporated where appropriate;
- The additional proposed site area is 1.85a;
- The cumulative site area of the existing and proposed is approximately 3.6ha;
- The existing vehicular access from/to Priestley Way will be used – construction and operation phases.

3.3. In order to inform this Screening Request in the context of the above principles/parameters for development, professional input has been gained regarding air quality, noise and ecology.

4. THE EIA REGULATIONS

LEGAL CONTEXT

4.1. EIA is a systematic and objective process through which the likely significant environmental effects of a development can be identified, assessed and, wherever possible, mitigated. Screening is the first stage in the process to determine if the proposed development should be subjected to EIA.

4.2. EIA is within English Law through the Town and Country Planning Environmental Impact Assessment) Regulations 2017 whereby these set out the procedures required to meet those objectives (previously set out within EU Directive 2011/92/EU) within the context of the English planning system.

4.3. The current Regulations came into force on 16 May 2017, with a number of changes being made to the EIA process, covering Screening, Scoping and the production for an Environmental Statement. The last amendments were in December 2020 to take account of the exit from the EU.

4.4. In relation to screening proposed developments to ascertain whether they should be subject to EIA, the following principles have been established through the Regulations:

- Any extension of time over and above the initial 3-week screening period is limited to no more than 90- days;
- There is more focus on frontloading the provision of information and identification of mitigation; and
- Focus on tried and tested industry standard mitigation.

THE STEPS IN SCREENING FOR EIA

4.5. In determining whether the proposed development constitutes EIA development, consideration must be given to the following:

- If the proposed development is of a type listed in Schedule 1 of the Regulations;
- If not, whether it is listed in Schedule 2;
- If so, whether it is of more than local significance, located in an environmentally sensitive area or likely to give rise to unusually complex and potentially hazardous effects; and/or
- It meets any of the relevant thresholds and criteria set out in Schedule 3.

4.6. For developments described in Schedule 1 of the EIA Regulations ('Schedule 1 development') EIA is mandatory.

4.7. For developments of a type described in Schedule 2 of the EIA Regulations ('Schedule 2 development') EIA may be required if the development has the potential to give rise to 'significant' environmental effects by virtue to is nature, size or location.

4.8. If the proposed development is of a type described in Schedule 2, then two further criteria should be considered:

- If the proposed development exceeds the respective applicable threshold in Schedule 2; or
- If the proposed development is located in or partly located in a 'Sensitive Area' for the purposes of the EIA Regulations.

4.9. Should either criteria be met, the proposed development will require screening against the selection criteria set out in Schedule 3 of the EIA Regulations. Further indicative thresholds and other guidance are also provided in the National Planning Practice Guidance (NPPG) published in March 2012 to supersede Circular 02/99. If neither of the above criteria is met, the proposed development does not require formal screening for EIA.

CONSIDERATION OF THE EIA REGULATIONS

4.10. The requirement for EIA is either mandatory or conditional, depending on the classification of the development project. This is based, in turn, on the likelihood of significant impacts arising.

4.11. The proposal is not Schedule 1 development as defined by the Regulations - therefore, an EIA is not mandatory. The proposals do fall within the 'catch all' criterion of Part 10 - Infrastructure Projects - of Schedule 2. The description of development in Part b is:

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

The applicable threshold to the proposed development is as follows:

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

With a proposed site area of 1.85ha, the threshold is exceeded and the screening process is required.

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

'….it should not be presumed that developments above the indicative thresholds should always be subject to assessment, or those falling below the thresholds could never give rise to significant effects, especially where the development is in an environmentally sensitive area. Each development will need to be considered on its merits.'

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

4.12. Given the exceedance of the threshold, the criteria described in Schedule 3 of the EIA Regulations are considered. The over-riding determination for EIA is whether the proposed development is likely to result in **significant** impacts on the environment.

4.13. As previously stated, Schedule 3 of the EIA Regulations set out the screening criteria in relation to proposed developments classified as Schedule 2 developments. These criteria seek to understand the character and complexity of impacts as well as any sensitives which relate to the site. In summary, the criteria fall under the following three headings:

- Characteristics of the development – taking into account the size, use of natural resources, production of waste and emissions and risk of accidents;
- Location of the development – consideration of environmental sensitivity of geographical areas likely to be affected by development; and
- Types and characteristics of the potential impact – specifically having regards to the extent, magnitude, complexity, probability, duration, frequency and reversibility of the impact.

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

5. APPRAISAL OF SCHEDULE 3 CRITERIA

INTRODUCTION

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

CHARACTERISTICS OF DEVELOPMENT

Size of the development

5.2. The proposals are for the construction of a data centre extension of up to five storeys plus a plant storey with a ground coverage area of *circa* 11,165sqm including the re-configuration of parking on a site area of 1.85ha. The existing data centre and surrounding land has a site area of approximately 2ha.

Cumulative effects

5.3. In respect of EIA, the Planning Practice Guidance[2] states that:

> *Each application (or request for a screening opinion) should be considered on its own merits. There are occasions, however, when other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development. The local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development.*

5.4. The Council's online planning records have been interrogated and the following have been particularly considered in terms of site relevance and cumulative effect within this Screening stage. To note, there is a significant planning history for these nearby sites but only the relevant to the screening process have been extracted. Table 1 identifies the relevant as existing/approved/pending for on-site or adjacent to.

Table 1 – Existing/approved development for cumulative considerations on-site

Reference /address	Description	Decision date
20/1828 – 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).	Permission granted October 2020

[2] Environmental Impact Assessment - GOV.UK (www.gov.uk)

Reference /address	Description	Decision date
21/0417 – JVC House	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 (Use Class B8).	Permission granted April 2021
21/3117 – JVC House	Variation of condition 2 (development built in accordance to approved plans) to allow: Increase the size and height of pumphouse. amend sprinkler tanks Alterations to the gate/fencing towards the southern boundary and additional landscaping Podium 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-	Permission granted December 2021

Reference /address	Description	Decision date
	configuration of the car parking layout and provision of security fencing in association with its use as a data centre (Use Class B8).	
21/4480 – JVC House	Non-material amendment (louvres relocated from south façade to west façade) 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 (Use Class B8).	Permission granted December 2021
21/3227 – JVC House	Demolition of JVC House and erection of a substation and groundworks to strengthen the roadway, relocation of cycle storage and fencing and associated landscaping.	Permission granted February 2022
EIA Screening – JVC Business Park	Request for Screening Opinion as to whether an Environmental Impact Screening Assessment is required for a proposed construction of a data centre extension of four storeys plus a plant level with a ground coverage of circa 8000sqm including a generator compound and parking on a site area of 1.5ha.	Not EIA development 14 February 2022
22/0942 – JVC House	Variation of condition 2, development built in accordance with approved drawings (design) of Full Planning Permission reference 21/3227 dated 24 February, 2022, for Demolition of JVC House and erection of a substation and groundworks to strengthen the roadway, relocation of cycle storage and fencing and associated landscaping.	Permission granted Fri 17 Jun 2022
21/4152 – JVC House	Prior approval for demolition of building	Prior approval granted 9 December 2021
22/1849 – JVC House	Full planning application for an extension to the existing data centre at the adjacent JVC House, alongside the re-configuration of the car parking layout, in association with	Registered

Reference /address	Description	Decision date
	its use as a data centre. This application will not be implemented if the proposals subject to this Screening Request progress, which are an updated version.	
22/2006 – JVC Business Park	Non-material amendment (sub-stations) of Variation of Conditions reference 21/3117 dated 1 December, 2021, for Variation of condition 2 (development built in accordance to approved plans) to allow : Increase the size and height of pumphouse. amend sprinkler tanks Alterations to the gate/fencing towards the southern boundary and additional landscaping Podium 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 (Use Class B8).	Permission granted 05 July 2022
22/2331 – JVC Business Park	Non-material amendment to alter the wording to condition 3, to state: Unless otherwise approved in writing by the Local Planning Authority, all new external work shall be carried out in the materials specified on page 17 of the submitted Design and Access Statement (Rev 06) (prepared by Scott Brownrigg, dated 27th June 2022) of Variation of Conditions reference 22/0942 dated 17 June, 2022, for Variation of condition 2, development built in accordance with approved drawings (design) of Full Planning Permission reference 21/3227 dated 24 February, 2022, for Demolition of JVC House and erection of a substation and groundworks to strengthen the roadway, relocation of cycle storage and fencing and associated landscaping.	Permission granted 01 August 2022
05/0679-719 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).	Permission granted 19 May 2005

Reference /address	Description	Decision date
19/0763 - 721 North Circular Road	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.	Permission granted 18 October 2019
20/1647 - 721 North Circular Road	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.	Permission granted 03 February 2021

5.5. Within the vicinity there are currently the following applications for significant developments which have also been considered:

- 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);
- 1-8 Capitol Way (NEAT Developments) - 500 residential units, across buildings of 4-12 storeys (ref. 19/4545);
- 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);
- Symal House, Edgware Road – prior approval change of offices into 45 self-contained studio flats (ref. 20/1311);
- 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);
- 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).

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 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);
- 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);

- 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);
- 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).

5.6. The following pages contain the completed EIA checklist.

Table 2: Completed EIA Checklist

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

Waste				
Will the project produce solid wastes during construction or operation or decommissioning?	Yes	There will be waste as a result of the construction, operation and decommissioning phases.	No	It is unlikely to be significant other than that normally associated with such an urban development. The depositing of the waste could be recycled where appropriate and disposed of at a licensed site. The implementation of waste reduction can be secured via a CEMP and in the operation phase, the mechanism could be a SWMP. These mitigation measures, if required, would ensure no significant impacts.
Pollution and nuisances				
Will the project release pollutants or any hazardous, toxic or noxious substances to air?	No	This is unlikely due to the nature of the proposals – the specific uses could be controlled by way of a suitably worded planning condition in any case. An Air Quality Assessment as part of the planning application will properly assess the impact. Appendix TPD2 contains the Air Quality Technical Note prepared to support this EIA Screening Request, which concludes: *'Construction phase impacts at both human and ecological receptors will be assessed in the air quality assessment and suitable mitigation measures will be proposed and included within an AQDMP which will form part of the CEMP[3]. 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.* *Air Quality impacts from the testing of the standby HVO generators will be undertaken as*	N/A	

[3] Construction Environmental Management Plan

		part of the air quality assessment using ADMS-5 dispersion model and impacts will be assessed at human and ecologically sensitive receptors. Where appropriate mitigation measures will be proposed to reduce the impacts from the proposed plant. *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.'*		
Will the project cause noise and vibration or release of light, heat, energy or electromagnetic radiation?	Yes	There will understandably be construction noise plus chillers and air handling units are essential for the operational phase.	No	Appendix TPD3 contains the Noise Technical Note for this screening and concludes: *'The potential noise impacts from the construction and operation of the Proposed Development have been considered in this Note and are summarised as follows:* *- Construction phase impacts are not expected to generate sufficient noise levels at noise sensitive locations and will be controlled through the implementation of a Construction Environmental Management Plan (CEMP)* *- Operational phase road traffic will be assessed although not expected to be sufficient to generate noise levels that would be considered significant.* *- Operational building services plant shall be selected and designed to meet the appropriate*

				external noise limits outside noise sensitive dwellings in accordance with BS 4142: 2014.'
Will the project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?	No	The site is located within a historically industrial area although the site is not on the contaminated land registered. The nature of works would not result in the release of pollutants or present a risk to contamination of land or water. If considered necessary, a Preliminary Land Contamination Risk Assessment could accompany the planning application and be the correct control and reporting mechanism. A development such as this once built is unlikely to represent a significant risk.	N/A	
Are there any areas on or around the location which are already subject to pollution or environmental damage, e.g. where existing legal environmental standards are exceeded, which could be affected by the project?	No	None – the site is not on any found contaminated land register.	N/A	
Population and human health				
Will there be any risk of major accidents (including those caused by climate change, in accordance with scientific knowledge) during construction, operation or decommissioning?	No	None.	N/A	
Will the project present a risk to the population (having regard to population density) and their human health during	Yes	There is always a risk associated with construction but it would be low given the nature and scale of the development. The	No	A Construction Traffic/Environmental Management Plan (CT/EMP) can be secured by a suitably worded planning condition as the

construction, operation or decommissioning? (for example due to water contamination or air pollution)		developer would need to work within the requirements of health and safety regulations and follow the considerate contractor's scheme. In addition, there would not be an introduction of higher risks that could affect human health as a result of the development.		proper and proportional mechanism for control. This will include a range of specific measures to manage the delivery of materials to/from the site. This will ensure that impacts are not significant.
Water resources				
Are there any water resources including surface waters, e.g. rivers, lakes/ponds, coastal or underground waters on or around the location which could be affected by the project, particularly in terms of their volume and flood risk?	Yes	The Reservoir and River Brent are located to the north. However, due to the nature of the proposals and that this is a previously developed urban site that is identified for industrial use, no significant alterations to volume and run-off are envisaged. The site is in flood zone 1. On-site water attenuation and any potential flooding will be designed-in including surface water drainage and sewerage.	No	The nature of development will not give rise to any significant effect on the existing water bodies. If consideration of water resources is necessary, the proper mechanism is via a free-standing report to the planning application. Suitably worded planning conditions are the most suitably and robust form of control, as necessary.
Biodiversity (species and habitat)				
Are there any protected areas which are designated or classified for their terrestrial, avian and marine ecological value, or any non-designated / non-classified areas which are important or sensitive for reasons of their terrestrial, avian and marine ecological value, located on or around the location and which could be affected by the project? (e.g. wetlands, watercourses or other water-bodies, the coastal zone, mountains, forests or woodlands, undesignated nature reserves or parks.	Yes	The adjacent Brent Reservoir is a SSSI and nature reserve – national designation.	No	Given the nature of the proposals in this urban area and the requirements for air quality and noise conforming to established standards in addition to the scale of development, the correct mechanism for assessing any effects is via a preliminary ecological appraisal (Appendix TPD4). This will accompany the planning application as that is the correct and proportional mechanism for assessment and not the EIA system. Key standard mitigation, compensation and enhancement actions are contained within the PEA to enable legislative and policy compliance and ensure that potential

(Where designated indicate level of designation (international, national, regional or local)).				impacts are fully mitigated or minimised. Additional bat surveys are already underway (as confirmed in Greengage's letter within Appendix TPD4)
Could any protected, important or sensitive species of flora or fauna which use areas on or around the site, e.g. for breeding, nesting, foraging, resting, over-wintering, or migration, be affected by the project?	Yes	Greengage Environmental Ltd undertook a Preliminary Ecological Appraisal (PEA) in July 2021 and reported in March 2022 which identified value for a number of notable and protected species and habitats on site and within the immediate vicinity – PEA can be found in Appendix TPD4. Habitats include the Brent Reservoir Site of Special Scientific Interest (SSSI) and Local Nature Reserve (LNR), a statutory and non-statutory designated site which lies immediately north of the site boundary. Potential for the site to support protected species and/or those of conservation concern include moderate potential for roosting bats in the large, dilapidated building on site, high moderate nesting bird potential within the scrub, dilapidated building, introduced shrub and scattered trees and confirmed presence of s41 priority invertebrate species cinnabar moth caterpillars *(Tyria jacobaeae*). Whilst foraging bats are not formally protected by laws, there is high value bat foraging habitat associated with the open mosaic habitat, woodland and woodland edge immediately north of the site. Further Phase II bat surveys are recommended to inform appropriate mitigation and compensation required which are confirmed to being undertaken. Key standard mitigation, compensation and enhancement actions are	No	Further surveys will incorporate any additional ecological mitigation strategy, which is the proportional mechanism not EIA and will fully inform the proposals that will form the planning application.

		described within the PEA 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 and invertebrate features. Subject to these recommendations being implemented, along with any further recommendations made within the phase II survey reports and CEMP, any potential impacts can be minimised, mitigated and or compensated for and the development should be compliant with legislation and planning policy.		
Landscape and visual				
Are there any areas or features on or around the location which are protected for their landscape and scenic value, and/or any non-designated / non-classified areas or features of high landscape or scenic value on or around the location which could be affected by the project? Where designated indicate level of designation (international, national, regional or local).	No	Given the urban nature of the area, no such areas or features exist. The SSSI as previously stated is designated primarily due the existence of wetland species and has been considered in the 'Biodiversity' section of this table. Cranes will be a likely construction feature but these will be temporary. Hoarding will also minimise construction views. The industrial setting and proposed height are not considered to result in likely significant impacts.	N/A	
Is the project in a location where it is likely to be highly visible to many people? (If so, from where, what direction, and what distance?)	No	Due to the nature of the existing townscape, the size of the proposals, the speed of travel and industrial/urban nature, it is not considered that the proposals of five storeys plus plant will be 'highly visible' in this context.	N/A	

Cultural heritage/archaeology				
Are there any areas or features which are protected for their cultural heritage or archaeological value, or any non-designated / classified areas and/or features of cultural heritage or archaeological importance on or around the location which could be affected by the project (including potential impacts on setting, and views to, from and within)? Where designated indicate level of designation (international, national, regional or local).	No	No, as previously stated, the nearest heritage features are some 0.5km from the site with intervening town/natural landscape and therefore it is not considered that these could be affected by the project including views to/from/within and the settings. Construction hoarding could assist, if necessary, during the construction process.	N/A	
Transport and access				
Are there any routes on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the project?	No	None.	N/A	
Are there any transport routes on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the project?	No	Whilst the North Circular is a heavily used route, the construction works will be controlled via a CE/TMP[4]. In addition, the data centre use does not generate excessive traffic due to its very nature.	N/A	
Land use				
Are there existing land uses or community facilities on or around the	No	None – whilst this is an urban area, the adjacent land uses (industrial), distances to residential	N/A	

[4] Construction Environmental/Traffic Management Plan

location which could be affected by the project? E.g. housing, densely populated areas, industry / commerce, farm/agricultural holdings, forestry, tourism, mining, quarrying, facilities relating to health, education, places of worship, leisure /sports / recreation.		and location will not result in significant impacts as a result of this development.		
Are there any plans for future land uses on or around the location which could be affected by the project?	No	Not aware of.	N/A	
Land stability and climate				
Is the location susceptible to earthquakes, subsidence, landslides, erosion, or extreme /adverse climatic conditions, e.g. temperature inversions, fogs, severe winds, which could cause the project to present environmental problems?	No	None.	N/A	
Cumulative effects				
Could this project together with existing and/or approved development result in cumulation of impacts together during the construction/operation phase?	No	As confirmed in paragraph 5.3, each application should be based on its own merits although there may be occasions where it is necessary to consider existing or approved developments. Construction processes can be properly controlled by Management Plans, pre-commencement planning conditions and co-ordination with other developments. In this instance given the existing/approved visual context, the proposed built form of	N/A	

		development will be visually absorbed and in keeping with the town and landscape. Whilst the proposals will be visible and there is no attempt to 'hide' the proposals, the context is such that cumulatively there will not be significant impacts as a result of this additional development to warrant an EIA.		
Transboundary effects				
Is the project likely to lead to transboundary effects?[5]	No	See footnote.	N/A	

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

TYPES AND CHARACTERISTICS OF THE POTENTIAL IMPACT

5.7 Finally, Schedule 3 is to consider the likely significant effects of the development on the environment in relation to the criteria set out in paragraphs 1 and 2 of that Schedule, namely the characteristics and location of development taking account of the following:

(a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);
(b) the nature of the impact;
(c) the transboundary nature of the impact;
(d) the intensity and complexity of the impact;
(e) the probability of the impact;
(f) the expected onset, duration, frequency and reversibility of the impact;
(g) the cumulation of the impact with the impact of other existing and/or approved development;
(h) the possibility of effectively reducing the impact.

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

6. CONCLUSIONS

6.1. In accordance with the EIA Regulations, this Screening Request has taken account of the proposed development, its location and the sensitivity of the existing environment. Whilst the site area exceeds the threshold criterion as an 'Urban Development Project' – Part 10b of Schedule 2 - the site is not within a Sensitive Area.

6.2. The over-riding determination for EIA is whether the proposed development is likely to result in likely **significant** effects on the environment. The site as already developed is not considered to be sensitive to new development and any environmental impacts are unlikely to be significant, complex or widespread.

6.3. In summary, potential environmental effects associated with traffic, air quality, noise, waste, pollution, flooding, ecology, visual and other physical changes resulting from the proposed development have been considered and are not expected to be significant with the standard project/construction mitigation where required.

6.4. Consequently, it is not considered that the proposals are EIA development but it is respectfully requested that Brent Council adopts a Screening Opinion in accordance with Regulation 6(6)(a) within three weeks from receipt of this Request or such longer period, not exceeding 90 days from that same date (Regulation 6(6)(b)) in respect of the proposed development.

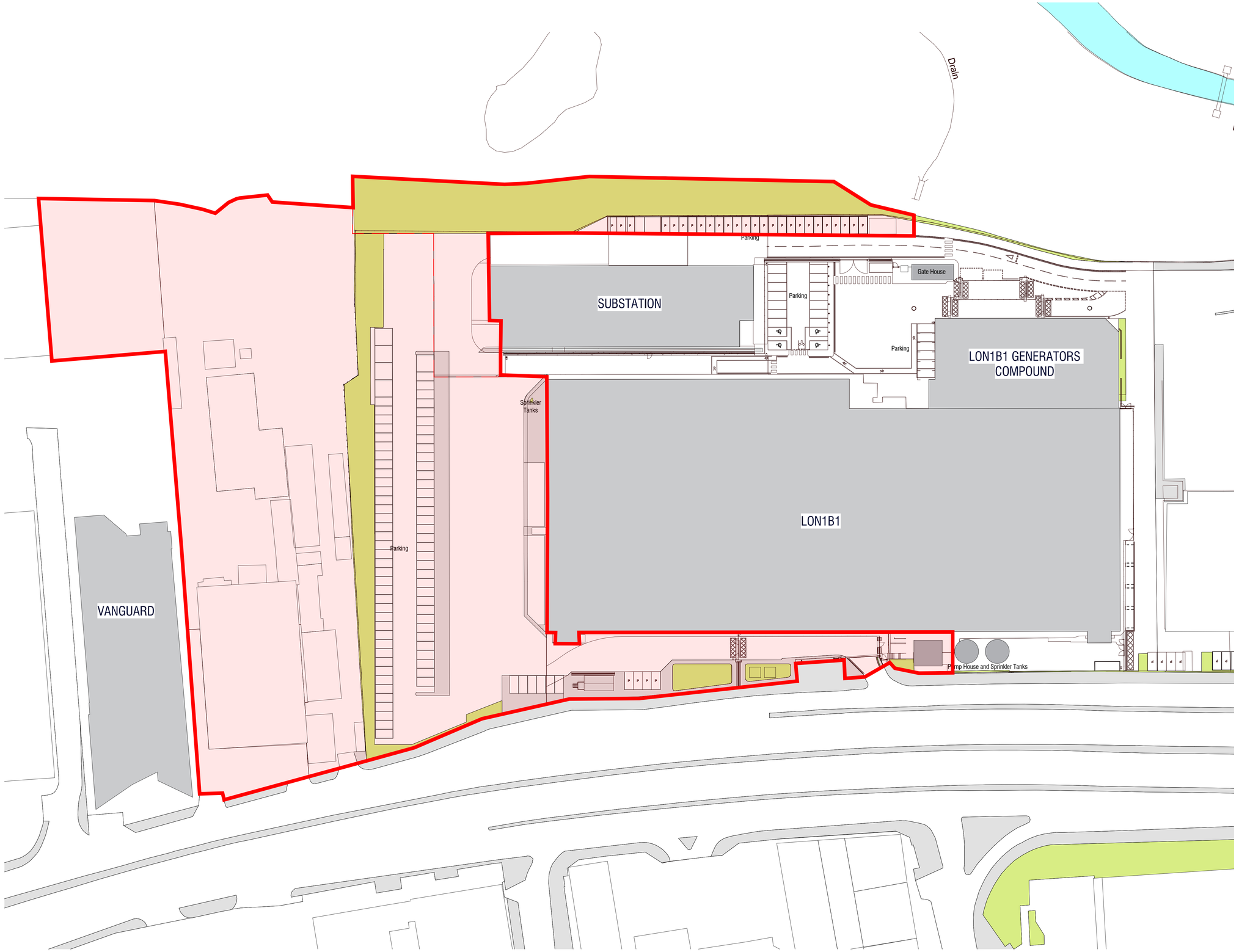
LM/Oct-22

Environmental Impact Assessment Screening Report

Appendix TPD 1: Location Plan (Scott Brownrigg)

metres 10 20 30 40 50

SCALE BAR: 1:500



WIP

26.09.2022

Revision	Description	Date	Drawn	Checked
P1	V3 Feasibility Issue	02/09/2022	KYL	JW

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Client's Name
PDCG

Job Title
LON1B2V3

Drawing Title
GA EXISTING SITE PLAN

Scale
1 : 500 @A1

Practice Project No.	Originator	Volume	Level	Type	Role	Number
LON1B2V3-	SBR-DC2-	XX-	DR-	A-	00100	

Suitability Code	Status	Rev
S2 -	FOR INFORMATION	P1

Environmental Impact Assessment Screening Report

Appendix TPD 2: Air Quality Technical Note (Hoare Lea)

Air Quality Technical Note for EIA Screening. LON1B2V3, Brent Cross.

Introduction

Hoare Lea have been appointed by PURE Data Centres Group to provide air quality advice in relation to the proposed LON1B2V3 datacentre development located within Brent Cross, London (the "Site").

This report identifies the considerations with regards air quality during the construction and operational phases in the context of EIA screening.

This note is intended to provide the following:

- A summary of baseline air quality in the local area from a review of published data from London Borough of Brent (LBB), Defra and the GLA;
- A description of the sensitivity of surrounding area in respect of air quality;
- Identification of receptors potentially impacted by the proposals;
- A description of the proposals and potential impact on local air quality (e.g. from increased traffic movements, combustion plant etc.);
- Consideration of cumulative impacts; and,
- An overview of mitigation measures anticipated to be required during the construction and operational phases including those embedded within the design.

Site Description and Proposed Development

The Site is located within an industrial area to the North of the North Circular Road (A406) and West of Edware Road (A5) in Brent Cross surrounded by other industrial buildings and commercial developments. North of the Site is Brent Reservoir which is designated as a Site of Special Scientific Interest (SSSI). To the South West and further North of the Site there are residential areas.

The Proposed Development consists of 50 hydrotreated vegetable oil (HVO) biodiesel generators that will be used for standby power to the datacentre in the case of 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. Generator testing will not be undertaken concurrently to minimise the short term air quality impacts.

Air Quality Standards

The potential air pollutants of concern associated with the Proposed Development are nitrogen dioxide (NO_2) associated with traffic generated by users of the Proposed Development and the HVO generators and fine particulates (PM_{10} and $PM_{2.5}$) associated with traffic, HVO generators and construction dust.

The Environment Act 1995 (Part IV)[1] requires the Secretary of State to publish an air quality strategy and local authorities to review and assess the quality of air within their boundaries with the aim of meeting specified Air Quality Objectives (AQO), as defined in the Air Quality (England) Regulations 2000 and Air Quality (England) (Amendment) Regulations 2002 and set out in the UK National Air Quality Strategy 2007. These standards and AQOs are designed to protect human health and the environment. and where they are unlikely to be achieved by the target year the LA is required to designate an Air Quality Management Area (AQMA).

The relevant AQO for NO_2 are an annual mean concentration of 40 $\mu g/m^3$ and an hourly mean concentration of 200 $\mu g/m^3$ not to be exceeded more than 18 times per year. For PM_{10} the AQO are an annual mean

[1] The Environment Act 1995 (Part IV) - [online]. (Last accessed: 15/09/2022), Available: http://www.legislation.gov.uk/ukpga/1995/25/part/IV

concentration of 40 µg/m^{3}and a 24-hour mean of 50 µg/m^3 not to be exceeded more than 35 times per year. For $PM_{2.5}$ the AQO is an annual mean objective of 25 µg/m^3.

The London Plan 2021[2]: is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years (covering the period 2019-2041) and the Mayor's vision for Good Growth. The Plan is part of the statutory development plan for London, meaning that the policies in the Plan should inform decisions on planning applications across the capital. There is a specific policy relating to air quality Policy SI 1 'Improving air quality' and part of this policy targets the world health organisation (WHO) air quality guidelines which are more stringent for PM_{10} and $PM_{2.5}$ targeting 20 µg/m^3 and 10 µg/m^3 respectively.

Baseline Air Quality

Site Setting

The Site is located within the LBB area of administration at approximate NGR: X 522246, Y 187226. The Site is bounded by:

- Brent Reservoir SSSI to the north;
- Residential dwelling further to the north;
- Industrial and commercial properties to the east;
- A406 (Northern Circular Road) to the south; and
- Industrial and commercial properties to the west.

A visual representation of the location of the Site and nearby monitoring locations is shown in Figure 1.

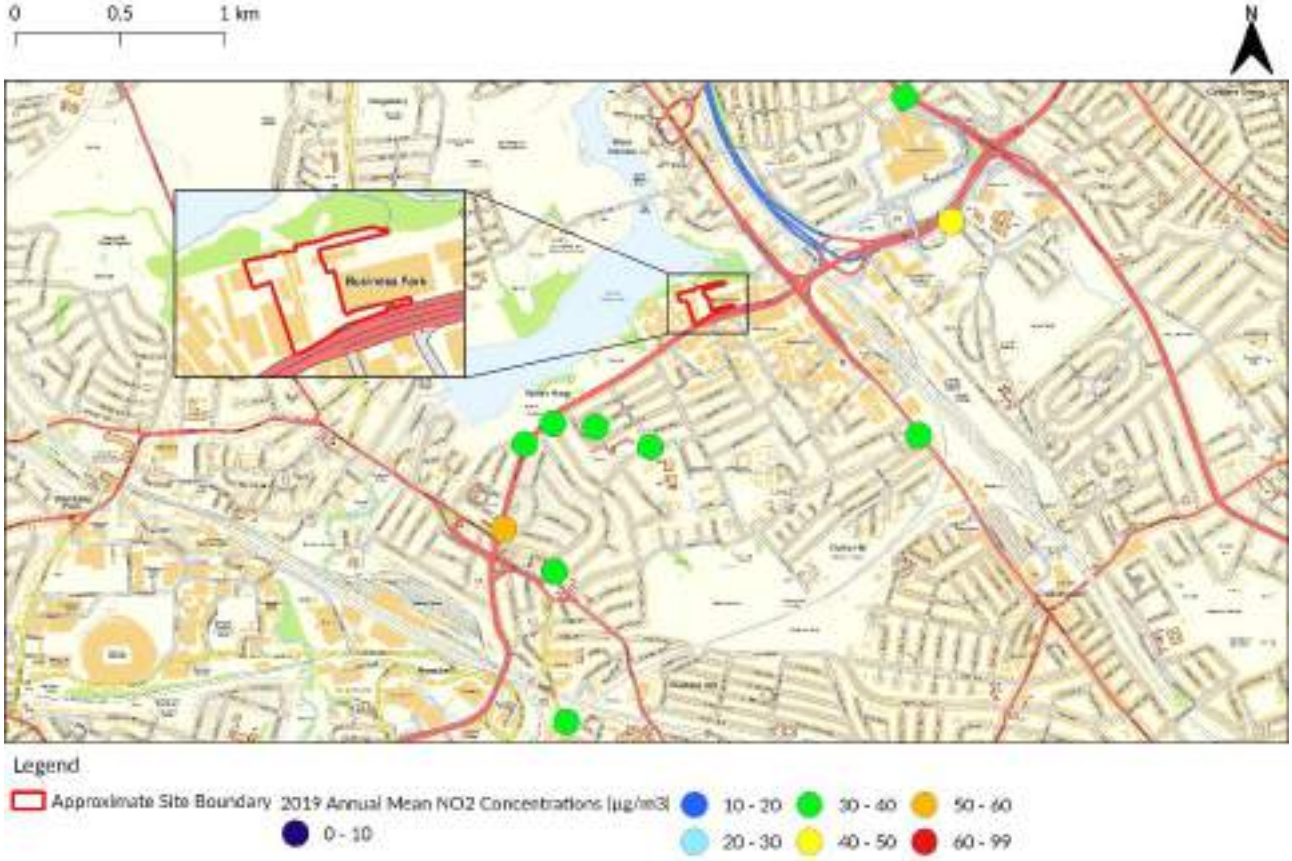


Figure 1: Location of NO_2 monitoring sites in the vicinity of the Site. Contains OS Data © Crown Copyright and Database rights 2022.

[2] London Plan (2021) – [online], Last accessed: 15/09/2022) Available: https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

Local Air Quality Monitoring

The Application Site is located within Brent Air Quality Management Area, declared by LBB for exceedances of the annual mean NO_2 and 24-hour mean PM_{10} AQOs.

The monitoring locations closest to the Site do not exceed the annual mean NO_2 AQO however there are exceedances at other locations within the vicinity of the Site.

In 2019, the most recent year with representative monitoring data, there were exceedances at two of the nine nearby (within 1.5km of Site) passive diffusion tube monitoring locations.

Defra Predicted Concentrations

National maps produced by Defra provide background concentrations of key pollutants for the whole of the UK. These estimated concentrations are produced on a 1 km by 1 km grid basis. The Application Site falls into grid square X 522500 Y 187500 and the predicted concentrations for this grid square for NO_2, PM_{10} and $PM_{2.5}$ in 2022, the current year, indicate that the background concentrations are below the relevant AQOs for all pollutants. NO_2 concentrations are below the WHO guidelines, but PM_{10} and $PM_{2.5}$ concentrations are in exceedance of the WHO guideline in 2022.

Greater London Authority

Air Quality Focus Areas

Air Quality Focus Areas (AQFAs) are locations that not only exceed the annual mean limit value for NO_2 but are also locations with high human exposure. The nearest AQFA to the Application Site is located approximately 90 m of the east of an AQFA (Neasden Junction inc Neasden Lane/Dudden Hill)). Additionally, the Application Site is located approximately 530 m to the south of another AQFA (Hendon M1 and A5).

Pollution Maps

The GLA produce LAEI annual mean concentration maps for the whole of London on a 20 m by 20 m grid for a historic year (2019) and future years (2025 and 2030) which are based on a baseline year of 2019.

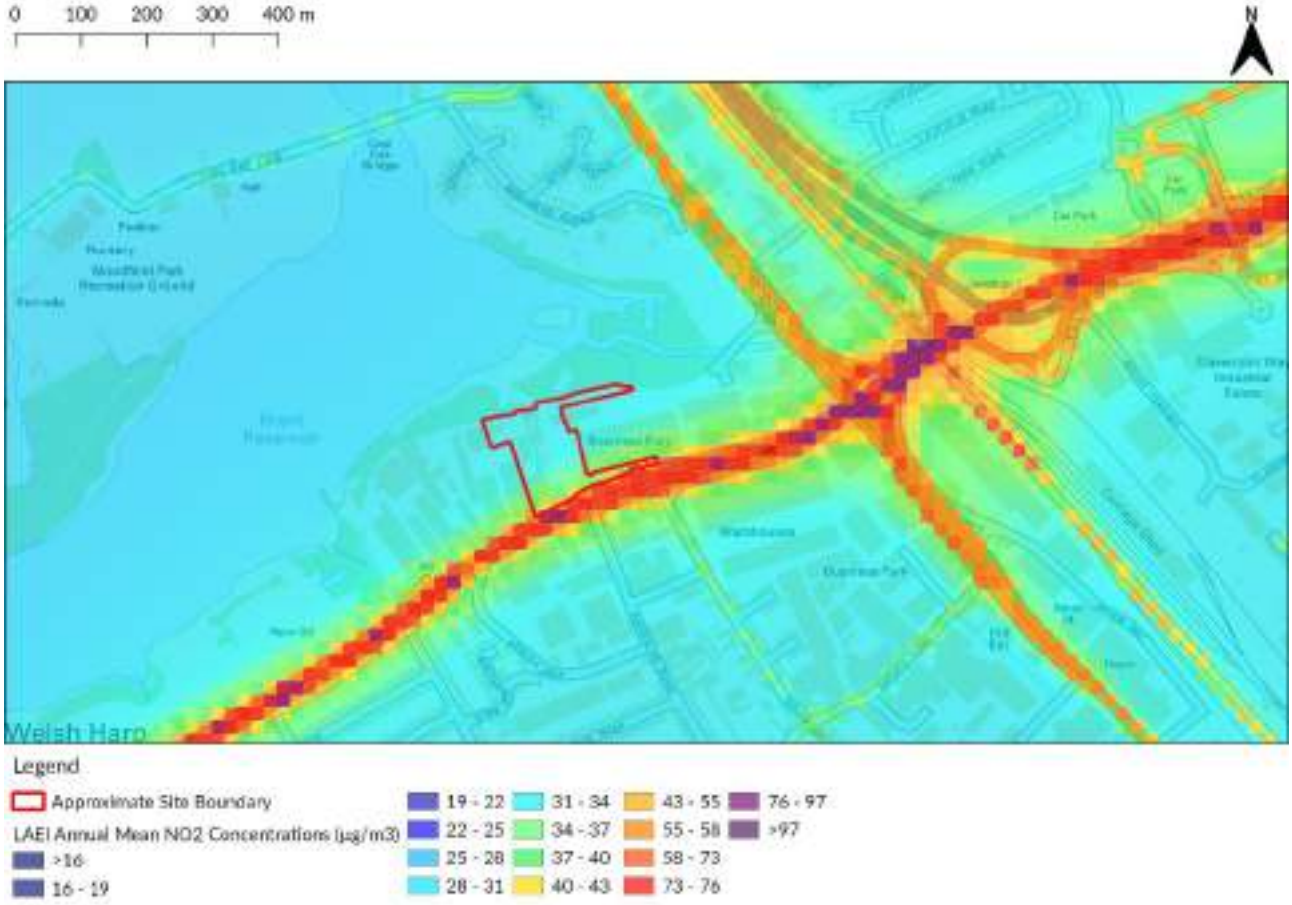


Figure 2: LAEI 2019 NO_2 concentration map. Contains OS Data © Crown Copyright and Database rights 2022.

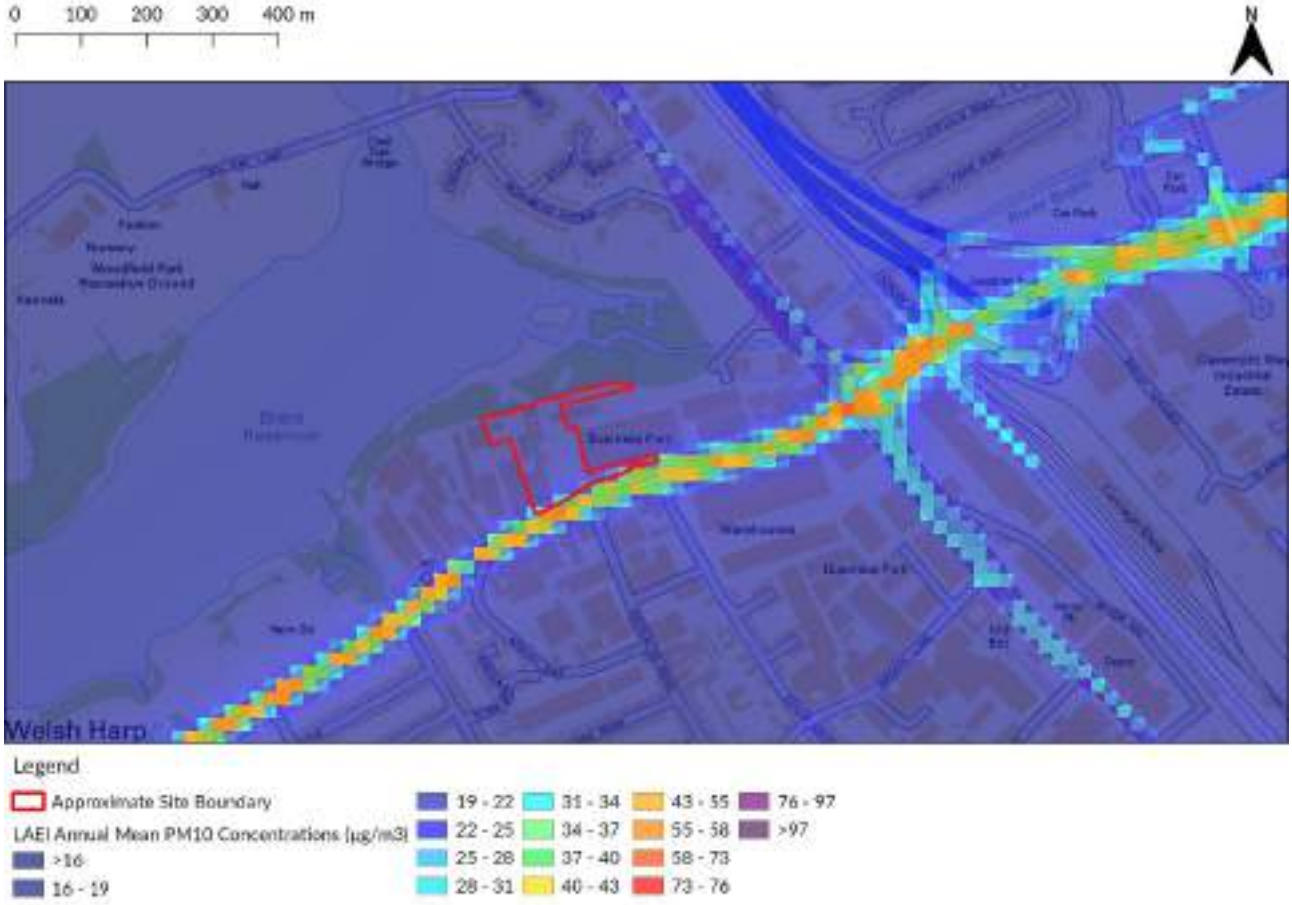


Figure 3: LAEI 2019 PM_{10} concentration map. Contains OS Data © Crown Copyright and Database rights 2022.

The worst-case concentrations of key pollutants, taken from the southern façade of the building close to the A406 (North Circular Road) in 2019, show that there are expected to be exceedances of the annual mean AQOs and WHO guidelines for NO_2 and PM_{10}.

Construction Phase

The construction of the Proposed Development is likely to generate dust and a dust risk assessment following the GLA 'Construction and Demolition Dust Guidance'. The majority of receptors in the immediate vicinity of the Site are commercial/industrial use and are considered medium sensitivity to dust soiling. Further away there are residential areas which are considered high sensitivity to dust soiling. There are also ecologically sensitive receptors to the North of the Site within the Brent Reservoir SSSI and these will be considered within the dust risk assessment.

The level of risk will be assessed following the GLA methodology based on the expected magnitude of works and sensitivity of the area. Mitigation measures commensurate with the determined level of risk will be recommended within the Air Quality Assessment which will accompany the planning application. The implementation of the recommended measures throughout the demolition and construction phases will be included within an air quality dust management plan (AQDMP) which should be included within the development construction environmental management plan (CEMP) and should be secured via planning condition such that the overall effect of the development on local air quality is not significant.

Operational Phase

The Proposed Development is located within an air quality management area (AQMA) which means the lower screening criteria apply when considering road traffic generated by the scheme. A screening assessment will be

undertaken and if the criteria is exceeded a detailed assessment using ADMS-Roads will be undertaken taking in to account the offsite air quality impacts from road traffic generated by the scheme. 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 key consideration for the operational phase of the Proposed Development will be impacts from the HVO generators testing on NO_2 and PM_{10} concentrations and where relevant volatile organic compounds, sulphur dioxide and carbon monoxide emissions will also be considered. The meteorological site at Heathrow Airport is considered representative of the Site and the prevailing wind direction is dominated by West-South Westerly directions as shown in Figure 4. This is likely to disperse emissions from the proposed plant to the north and east of Site. The nearest sensitive receptors in these directions are the ecologically sensitive Brent Reservoir SSSI and further away the residential receptors at Woolmead Avenue and surrounding roads.

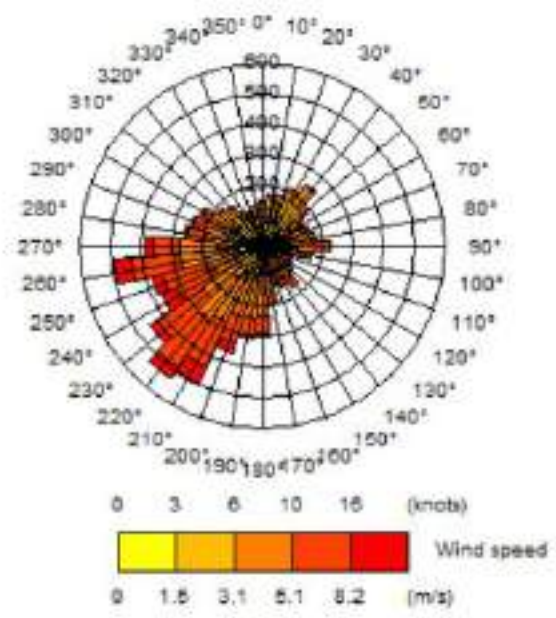


Figure 4: Wind Rose for Heathrow Airport in 2019.

The air quality impacts from the proposed plant will be assessed using ADMS-5 dispersion model and this detailed assessment will identify any potentially significant air quality impacts in consultation with the project ecologists, Greengage. Key impacts that will be assessed will include: NOx concentrations, N-deposition and acid-deposition. The proposed plant will be permitted under the industrial emissions directive (IED) which will contribute to limiting emissions and reducing impacts.

The assessment will also take account of emissions from the adjacent data centre development that will be considered within the cumulative assessment of impacts.

Appropriate mitigation will be applied where necessary in order to reduce any air quality impacts and ensure that any potential effects are not significant.

Summary

The Proposed Development is for a datacentre that will include 50 HVO generators for standby power. The potential air quality impacts from the construction and operation of the Proposed Development have been considered in the Note and are summarised as follows:

- Construction phase impacts at both human and ecological receptors will be assessed in the air quality assessment and suitable mitigation measures will be proposed and included within an AQDMP which will form part of the CEMP.

- 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.
- Air Quality impacts from the testing of the standby HVO generators will be undertaken as part of the air quality assessment using ADMS-5 dispersion model and impacts will be assessed at human and ecologically sensitive receptors. Where appropriate mitigation measures will be proposed to reduce the impacts from the proposed plant.

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.

Environmental Impact Assessment Screening Report

Appendix TPD 3: Noise Technical Note (Hoare Lea)

Noise Technical Note for EIA Screening. LON1B2V3, Brent Cross

Introduction

Hoare Lea have been appointed by PURE Data Centres Group to provide acoustic advice in relation to the proposed LON1B2V3 datacentre development located within Brent Cross, London.

This report identifies the considerations with regards to noise during the construction and operational phases in the context of EIA screening.

This note is intended to provide the following:

- Site description
- Noise standards and guidance
- A summary of the baseline noise environment
- Potential sensitive receptors
- Construction phase impacts
- Operational phase impacts
- Summary

Site Description and Location

The site is located within the London Borough of Brent (LBB) at approximately NGR: X 522246, Y 187226. The site is bounded by:

- Brent Reservoir to the north
- Residential dwellings further to the north
- Industrial and commercial properties to the east and west
- A406 (Northern Circular Road) to the south

Figure 1: Approximate site location and surrounding area

Approximate Application Site Boundary

Figure 2: Existing site plan and proposed Application site boundary

Noise Standards and Guidance

The legislation, policy and guidance relevant to the noise assessment is listed below.

- National and Local Planning Policy
- National Planning Policy Framework
- Planning Practice Guidance
- London Plan 2021
- LBB Design Guide SPD1 Nov 2018

Guidance

- BS 4142: 2014 + A1: 2019 'Methods for rating and assessing industrial and commercial sound', BSI 2019
- BS 7445 Description and measurement of environmental noise, Part 2: Guide to the acquisition of data pertinent to land use, 1991;

  BS 5228 Code of practice for noise and vibration control on construction and open sites, Part 1: Noise, 2009 + A1:2014;
- BS 5228 Code of practice for noise and vibration control on construction and open sites, Part 2: Vibration, 2009 + A1:2014;

- BS 6472 'Guide to evaluation of human exposure to vibration in buildings', Part 1 'Vibration sources other than blasting', BSI 2008;
- ISO 9613 Acoustics – Attenuation of sound during propagation outdoors, Part 2: General method of calculation, 1996;
- BS 8233: 2014 – 'Guidance on sound insulation and noise reduction for buildings', BSI 2014.
-

Baseline Noise levels

Environmental noise levels have been obtained using the available data from Defra. National maps produced by Defra provide environmental noise levels from road and railway and are shown for daytime and night-time in Figures 3 and 4.

The ambient noise levels on the Proposed Development site during the daytime range between 60-70 dB $L_{Aeq,T}$ and during the night between 50-60 dB $L_{Aeq,T.}$

The ambient noise levels at the nearest noise sensitive residential dwellings to the north during the daytime range between 55-60 dB $L_{Aeq,T}$ and during the night between 50-55 dB $L_{Aeq,T.}$

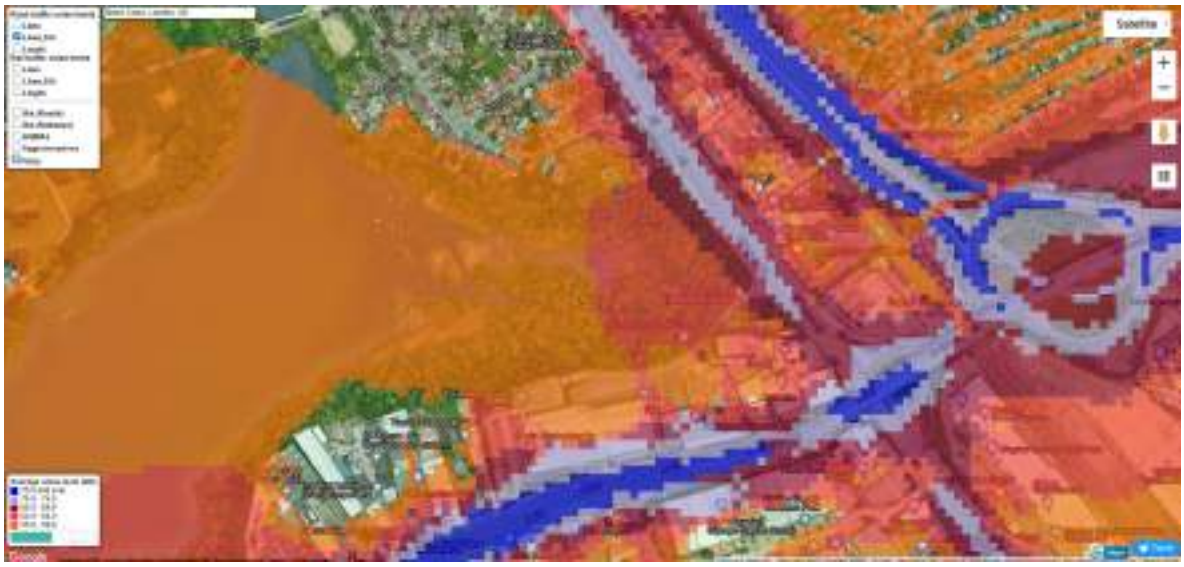


Figure 3: Daytime ambient noise levels $L_{Aeq.\ 16\ hour}$

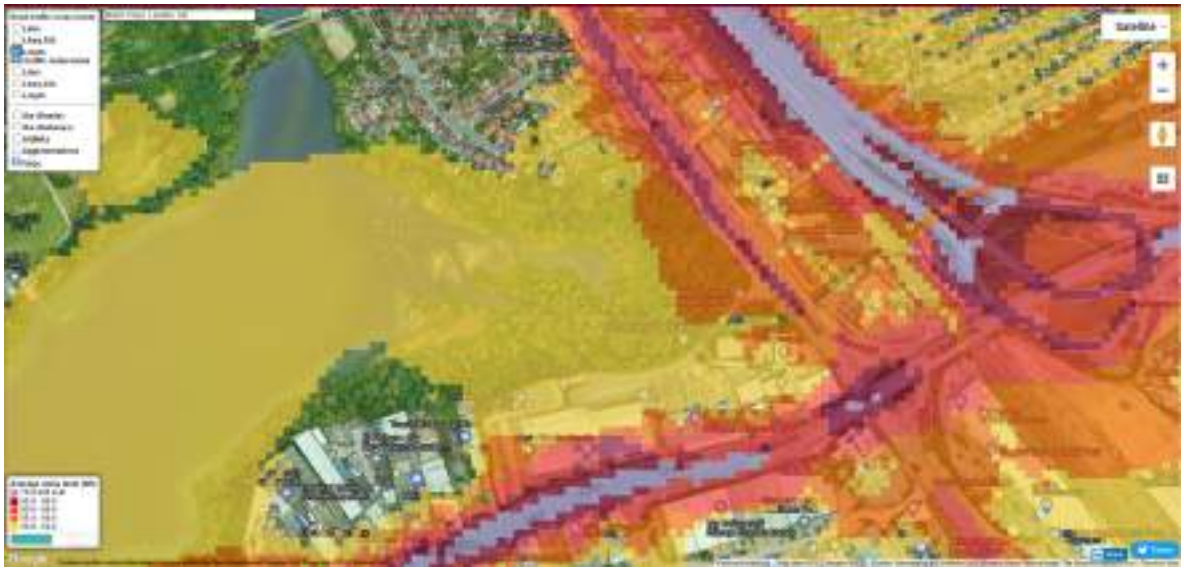


Figure 4: Night-time ambient noise levels $L_{Aeq.\ 8\ hour}$

Noise sensitive receptors

The development site is confined by the North Circular (A406) road to the south. There are existing commercial and industrial premises to the east and west. Beyond the site to the north, is the Brent Reservoir and nature reserve, and further to the north residential receptors off Woolmead Avenue. It is considered those dwellings located off Woolmead Avenue as being the nearest noise sensitive residential receptors.

Construction Phase

It is anticipated that noise and vibration produced during construction phase activities would be inherently controlled through the implementation of a Construction Environmental Management Plan (CEMP). Therefore, the effects of noise and vibration during the construction phase of the Proposed Development from on-site activities are unlikely to be considered significant.

Road traffic generated by the Proposed Development during its construction phase is currently unknown. If the change in traffic flow as a result of the construction of the Proposed Development is less than 25% compared with the existing traffic flows, this would equate to an increase in noise level of less than 1 dB(A). Construction traffic is unlikely to be considered significant.

Operation Phase

Road traffic generated by the Proposed Development during its operational phase is currently unknown. However, there is no significant vehicles movements associated with the Proposed Development and as such, we do not foresee operational road traffic impacting on existing noise sensitive receptors. The impact can be assessed once this information becomes available.

Building services noise associated with the Proposed Development will be assessed in line with BS 4142: 2014 and limits recommended such that noise does not exceed typical L_{A90} background noise levels. Establishment of design criteria in compliance with BS 4142: 2014 will be included in the design and can be conditioned under any planning consent granted. Therefore, effects of operational noise from building services plant at noise sensitive receptors are unlikely to be considered significant.

Summary

The potential noise impacts from the construction and operation of the Proposed Development have been considered in this Note and are summarised as follows:

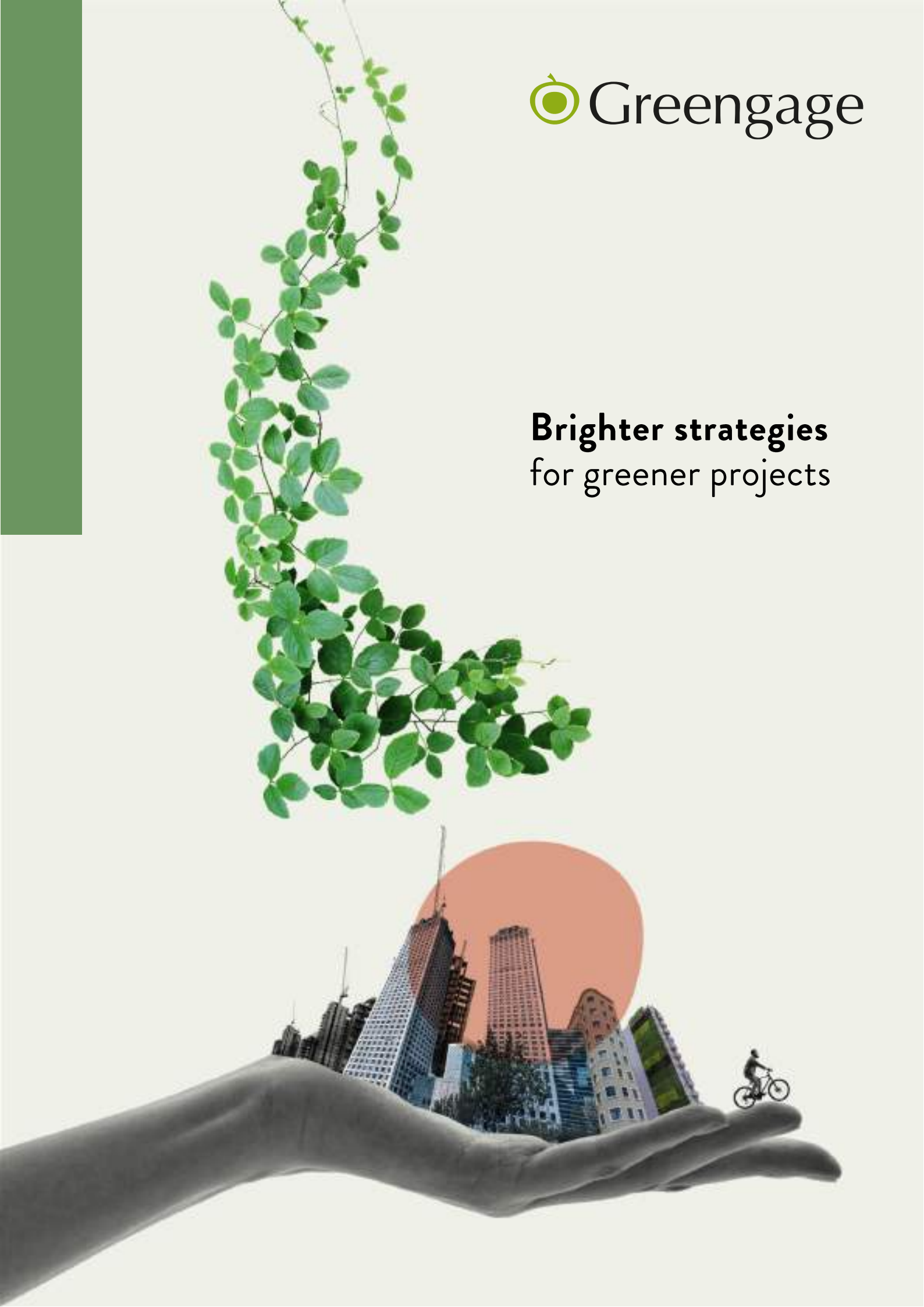
- Construction phase impacts are not expected to generate sufficient noise levels at noise sensitive locations and will be controlled through the implementation of a Construction Environmental Management Plan (CEMP)
- Operational phase road traffic will be assessed although not expected to be sufficient to generate noise levels that would be considered significant.
- Operational building services plant shall be selected and designed to meet the appropriate external noise limits outside noise sensitive dwellings in accordance with BS 4142: 2014.

Environmental Impact Assessment Screening Report

Appendix TPD 4: Preliminary Ecological Appraisal and Letter Dated 21 September 2022 (Greengage)

Greengage

Brighter strategies
for greener projects



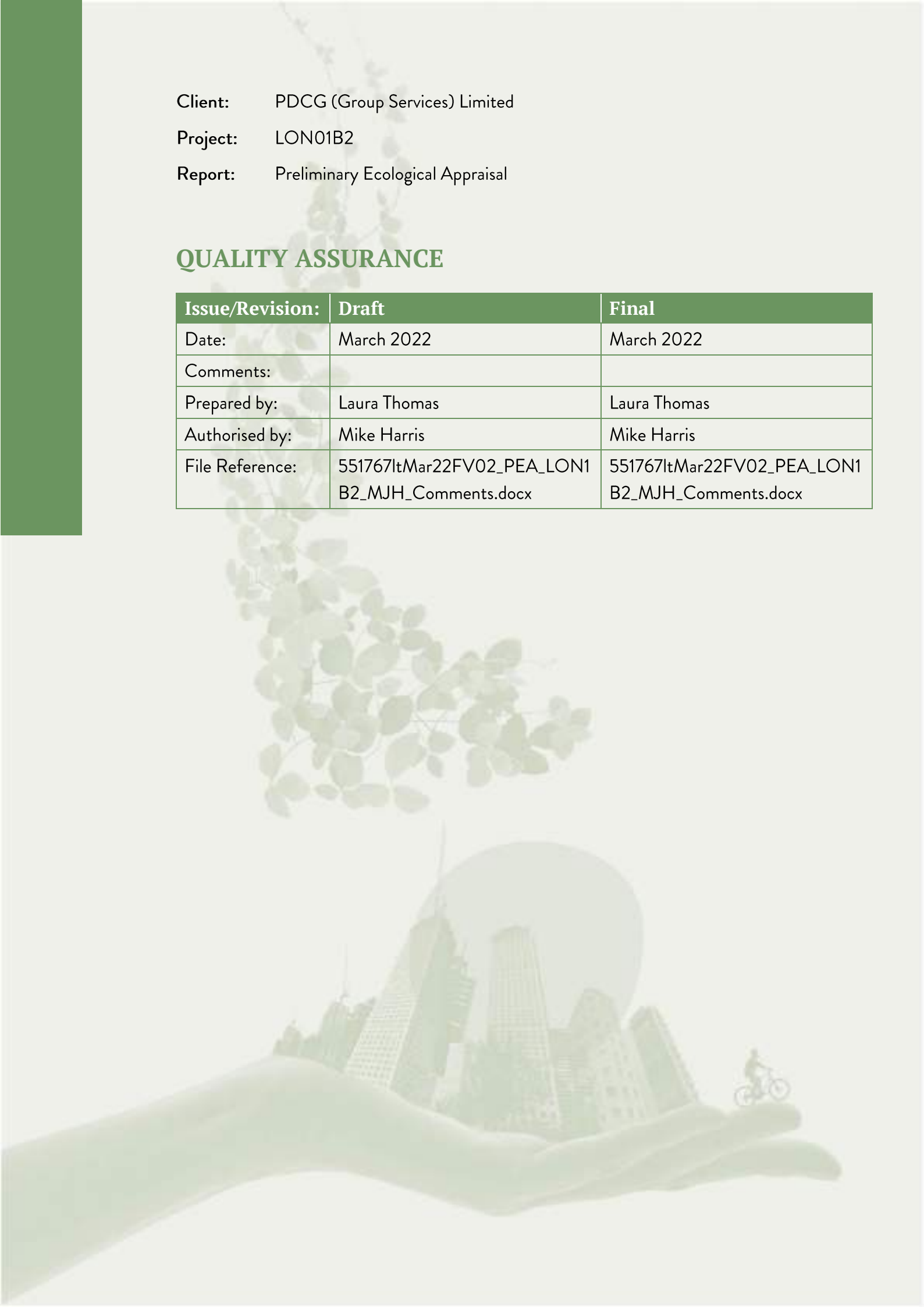
Client: PDCG (Group Services) Limited

Project: LON01B2

Report: Preliminary Ecological Appraisal

QUALITY ASSURANCE

Issue/Revision:	Draft	Final
Date:	March 2022	March 2022
Comments:		
Prepared by:	Laura Thomas	Laura Thomas
Authorised by:	Mike Harris	Mike Harris
File Reference:	551767ltMar22FV02_PEA_LON1B2_MJH_Comments.docx	551767ltMar22FV02_PEA_LON1B2_MJH_Comments.docx



CONTENTS

1.0 EXECUTIVE SUMMARY

Greengage was commissioned to undertake a Preliminary Ecological Appraisal by PDCG (Group Services) Limited of a site known as LON1B2 in the London Borough of Brent.

This document is a report of this survey and has been produced to support a planning submission for the site which seeks to develop a new data centre and associated generators.

This survey aimed to establish the ecological value of this site and the presence/likely-absence of notable and/or legally protected species in order to inform appropriate mitigation, compensation and enhancement actions in light of proposed development works.

The survey area extends to 1.7 hectares and comprises hardstanding, buildings including several dilapidated built structures, tall ruderal habitat, ephemeral/short perennial vegetation, scrub, introduced shrub, amenity grassland and scattered trees.

The details received in a desk top study and observations from the survey identified the site as having:

- The Brent Reservoir Site of Special Scientific Interest (SSSI) and Local Nature Reserve (LNR), a statutory and non-statutory designated site, immediately north of the site;
- UK BAP habitat Lowland Mixed Deciduous Woodland lies immediately north of the site;
- Moderate potential for roosting bats in the large, dilapidated building on site;
- High value bat foraging habitat associated with the tall ruderal habitat, woodland and woodland edge immediately north of the site;
- Nesting bird potential in the scrub, dilapidated building, introduced shrub and scattered trees;
- Confirmed presence of s41 priority invertebrate species cinnabar moth caterpillars (*Tyria jacobaeae*) on the common ragwort (*Jacobaea vulgaris*); and
- Confirmed presence of invasive species Japanese knotweed (*Fallopia japonica*).

This report should be read in conjunction with the EIA screening assessment which assesses the operational impact of the development and whether potential changes to air quality will have an impact on the adjacent SSSI. This assessment will inform whether a formal Ecological Impact Assessment is required. Any impacts upon the adjacent designated site, the Brent Reservoir associated with construction should be fully avoided/mitigated through the implementation of a Construction Environment Management Plan (CEMP), including information on pollution control measures and an ecologically sensitive lighting strategy following best practice guidance. The CEMP should be secured through planning condition.

A bat emergence/re-entry survey should be undertaken on the buildings with moderate bat potential to assess presence/likely absence and inform any mitigation required.

Compensatory foraging habitat should be provided for areas of suitable habitat lost and a bat sensitive lighting scheme should be in place to ensure light spill onto the adjacent woodland does not exceed

existing light levels, and where possible reduces it, to maintain its potential value for foraging and commuting bats.

The trees, scrub, introduced shrub, and dilapidated buildings, have potential for nesting birds., Clearance and demolition should be undertaken outside of nesting bird season (March-August, inclusive) unless confirmed absent by a suitably qualified ecologist within 48 hours of site clearance

Compensatory habitat should be provided for any loss of cinnabar moth habitat.

Japanese Knotweed will need to be removed from site and disposed of following best practice guidance (DEFRA, 2016).

This report should be read in conjunction with the Biodiversity Impact Assessment (BIA) report which demonstrates how the proposals meet national policy in relation to deliverance of Biodiversity Net Gain.

Mitigation, compensation and enhancement concepts are discussed which should be factored into the design and approach at site.

Ecological enhancement recommendations for the scheme have been made in line with local conservation objectives and include habitat creation, wildlife friendly planting and the installation of bird boxes.

Should recommendations made within this report and recommendations within the CEMP be adhered to, the development is likely to be compliant with legislation and planning policy as well as stand to result in a positive increase in value for biodiversity.

2.0 INTRODUCTION

Greengage was commissioned to undertake a Preliminary Ecological Appraisal by PDCG (Group Services) Limited of a site known as LON1B2 in the London Borough of Brent.

This document is a report of this survey and has been produced to support a planning submission for the site which seeks to develop a new data centre and associated generators.

This survey aimed to establish the ecological value of this site and the presence/likely-absence of notable and/or legally protected species in order to inform appropriate mitigation, compensation and enhancement actions in light of proposed development works.

SITE DESCRIPTION

The survey area extends to approximately 1.7 hectares and is centred on National Grid Reference TQ 22141 87186, OS Co-ordinates 522141 , 187186.

The site predominantly comprises hardstanding, buildings including several dilapidated built structures, tall ruderal, ephemeral/short perennial, scrub, introduced shrub, amenity grassland and scattered trees.

The site is located within Brent, a borough comprising largely residential, industrial, and commercial development. The site lies on the outskirts of a business park with the A406 immediately abutting the southern boundary and the A5 running 0.2km east. Immediately to the north of the site lies the woodland edge that surrounds Brent Reservoir, a statutory designated Site of Special Scientific Interest (SSSI) and Local Nature Reserve (LNR). Other notable greenspace in the area is limited to playing fields and parks.

3.0 METHODOLOGY

The PEA (which included an Extended Ecological Phase 1 Survey) was undertaken in accordance with guidance in the Joint Nature Conservation Committee (JNCC) (2010) Handbook for Phase 1 Habitat Survey[1] and the Chartered Institute of Ecological and Environmental Management (CIEEM) (2017) Guidelines for Preliminary Ecological Appraisal[2], in accordance with BS42020:2013: Biodiversity[3]. The overall assessment consisted of:

- Site specific biological information gained from statutory and non-statutory consultation; and
- A site walkover, protected species scoping assessment and phase 1 habitat survey.

The site-specific consultation provided the ecological context for the site survey carried out on the 15th July 2021.

The survey boundary and existing site is shown at Figure A.1.

Greengage undertook the site walkover during dry and sunny weather conditions. Features within the site boundary and accessible features immediately bordering it were evaluated and the extent and distribution of habitats and plant communities were recorded, and supplemented with target notes on areas or species requiring further commentary. Fauna using the area were recorded and areas of habitat suitable for statutorily protected species were identified where present, with an active search carried out for evidence of such use.

3.1 DESK TOP REVIEW

A review of readily available ecological information and other relevant environmental databases (included Defra's Multi-Agency Geographic Information for the Countryside (MAGIC) website) was undertaken for the site and its vicinity. In addition, a biological records search from Greenspace Information for Greater London (GiGL) was reviewed to identify the location and citations of local non-statutory designated sites and presence of records for notable and protected species. This provided the overall ecological context for the site, to better inform the Phase 1 Survey.

3.2 ON SITE SURVEYS

Flora

The extent and distribution of different habitats on site were identified and mapped according to the standard Phase 1 Survey methodologies, supplemented with target notes describing the dominant botanical species and any features of interest. Any present protected plant species and invasive/non-natives were also noted. A habitat map has been produced to illustrate the results, as shown at **Error! Reference source not found.**

Fauna

The Phase 1 Survey specifically included assessments to identify the potential value for notable, rare and protected species at site. This involved identifying potential habitats in terms of refugia, breeding sites and foraging areas in the context of species known to be present locally and regionally.

The likelihood of occurrence is ranked as follows:

- Negligible - While presence cannot be absolutely discounted, the site includes very limited or poor-quality habitat for a particular species. The site may also be outside the known national range for a species;
- Low - On-site habitat is poor to moderate quality for a given species, with few or no information about their presence from desk top study. However, presence cannot be discounted due to the national distribution of the species or the nature of on-site and surrounding habitats;
- Moderate - The on-site habitats are of moderate quality, providing most or all of the key requirements for a species. Several factors may limit the likelihood of occurrence, habitat severance, habitat disturbance and small habitat area;
- High - On-site habitat of high quality for given species. Site is within a regional or national stronghold for that particular species with good quality surroundings and good connectivity; and
- Present - Presence confirmed for the survey itself or recent, confirmed records from information gathered through desk top study.

The species surveyed for included:

Badger (*Meles meles*)

The potential for badger to inhabit or forage within the study area was assessed. Evidence of badger activity includes the identification of setts (a system of underground tunnels and nesting chambers), grubbed up grassland (caused by the animals digging for earthworms, slugs, beetles etc.), badger hairs, paths, latrines and paw prints.

Bat Species (*Chiroptera*)

The site visit was undertaken in daylight and the evaluation of bat potential comprised an assessment of natural features on site that aimed to identify characteristics suitable for bat roosts, foraging and commuting. In accordance with Bat Conservation Trust's Good Practice Guidelines[4] and methods given in English Nature's (now Natural England) Bat Mitigation Guidelines[5] consideration was given to:

- The availability of access to roosts for bats;
- The presence and suitability of crevices and other places as roosts; and
- Signs of bat activity or presence.

Definite signs of bat activity were taken to be:

- The bats themselves;

- Droppings;
- Grease marks;
- Scratch marks; and
- Urine spatter.

Signs of possible bat presence were taken to be:

- Stains; and
- Moth and butterfly wings.

Features with potential as roost sites include mature trees with holes, crevices or splits (the most utilised trees being oak, ash, beech, willow and Scots pine), caves, bridges, tunnels and buildings with cracks or gaps serving as possible access points to voids or crevices.

Additionally, linear natural features such as tree lines, hedgerows and river corridors are often considered valuable for commuting and semi-natural habitats such as woodland, meadows and waterbodies can provide important foraging resources. Consideration was given to the presence of these features both immediately within and adjacent to the assessment area.

Great Crested Newt (*Triturus cristatus*)

An assessment was carried out to identify any potential habitats that may support great crested newt (GCN) and other native amphibians. The aquatic and terrestrial habitats required generally include small, still ponds or water bodies suitable for breeding; and woodland or grassland areas where there is optimal invertebrate prey potential.

Reptiles

The potential for reptile species on site was assessed during the walkover survey. Possible species include grass snake (*Natrix natrix*), smooth snake (*Coronella austriaca*), adder (*Vipera berus*), common and sand lizard (*Lacerta vivipara* and *L. agilis*) and slow worm (*Anguis fragilis*). These native reptile species generally require open areas with low, mixed-height vegetation, such as heathland, rough grassland, and open scrub or, in the case of grass snake, waterbody margins. Suitable well drained and frost-free areas are needed so they can survive the winter.

Dormouse (*Muscardinus avellanarius*)

During the walkover survey the potential for dormouse to be present on site was assessed. This included observations for suitable habitat such as well-layered woodland, scrub and linking hedgerows, particularly those comprised of species offering suitable food sources such as honeysuckle and hazel, in addition to direct evidence such as characteristically gnawed hazelnuts, chewed ash keys and honeysuckle flowers, or nests.

Water Vole (*Arvicola terrestris*)

Water vole potential was assessed during the walkover survey. The potential is identified by the presence of ditches, rivers, dykes and lakes with holes and runs along the banks. Latrines, footprints or piles of food can also be noted.

Otter (*Lutra lutra*)

Where desktop review or consultation indicates the presence of otter in a river catchment, the presence of water bodies with good cover and potential holt (den) sites would be noted. Spraint, footprints or food remains can also be noted.

Birds

During the walkover survey, the potential for breeding, wintering and migratory birds was assessed. In particular, this includes areas of trees, scrub, heathland and wetlands that could support nests for common or notable species.

Invertebrates

As part of the walkover survey the quality of invertebrate habitat and the potential for notable terrestrial and aquatic invertebrate species was considered. There is a wide variety of habitats suitable for invertebrates including wetland areas, heathland, areas of bare sandy soil, ephemeral brownfield vegetation and meadows.

Biodiversity Action Plan priority species/ Species of Principal Importance

Where consultation and desk-study indicates the presence of BAP priority species (Species of Principal Importance) not protected by statute, effort was made to establish the potential for the site to support these species.

3.3 SURVEYORS

Laura Thomas, who undertook the survey and wrote this report, has an undergraduate degree in Biology (BSc Hons) and a Master's degree in Evolutionary and Behavioural Ecology and is a Graduate member of CIEEM. Laura has over 4 years' experience in the commercial sector.

Mike Harris, who verified this report, has a Bachelor's degree in Environmental Biology (BSc Hons), a Natural England Great Crested Newt Licence (2015-17819-CLS-CLS) and Dormouse Licence (2016-21291-CLS-CLS), is a Chartered Environmentalist (CEnv) and is a Full member of CIEEM. Mike has over 17 years' experience in ecological surveying and has undertaken and managed numerous ecological surveys and assessments.

This report was written by Laura Thomas and reviewed and verified by Mike Harris who confirms in writing (see the QA sheet at the front of this report) that the report is in line with the following:

- Represents sound industry practice;
- Reports and recommends correctly, truthfully and objectively;

- Is appropriate given the local site conditions and scope of works proposed; and
- Avoids invalid, biased and exaggerated statements.

3.4 CONSTRAINTS

The PEA was undertaken during an optimal time of year during ideal conditions by a suitably qualified ecologist. Not all areas of site were accessible at the time of the survey, however, these areas were visible and it was possible to characterise broad habitats from adjacent areas

No significant constraints that stand to impact conclusions drawn in this report therefore presented themselves.

4.0 RESULTS

4.1 DESK TOP REVIEW

Designations

Consultations with the local biological record centres (GiGL) and the MAGIC dataset have confirmed that there are no statutory designations of national or international importance within the boundary of the site.

There is however one statutory designated Site of Special Scientific Interest (SSSI) and Local Nature Reserve (LNR) within the search area and one LNR within a 2km radius located immediately north of the site.

Records from GiGL also identified 15 non-statutory Sites of Importance for Nature Conservation (SINC) within 2km of the site boundary. SINCs are recognised by LPAs as important wildlife sites.

Table 4.1 below gives the locations and descriptions of a selection of the nearest/most relevant local designations.

Table 4.1 Statutory and Non-Statutory Designated Sites within Search Radius

Site Name	Approximate Location	Description
Statutory Designations		
Brent Reservoir (Welsh Harp) (SSSI and LNR)	Immediately north of the site	The Brent Reservoir is of interest primarily for breeding wetland birds and in particular for significant numbers of nesting great crested grebe. The diversity of wintering waterfowl and the variety of plant species growing along the water margin are also of special note for Greater London, the more notable include common spotted orchid (*Dactylorhiza fuchsia*) and greater spearwort (*Ranunculus lingua*). Toward the head of the northern and eastern areas there are varied gradations from open water, through swamp and mixed species fen to willow carr, with damp willow woodland occupying the higher ground. Breeding birds of the swamp, fen and willow carr include reed and sedge warblers, reed bunting, redpoll and willow tit. The more secluded areas adjoining open water are the favoured nesting sites for Coot, great crested grebe, little grebe, moorhen, mute swan, pochard, shoveler and tufted duck regularly breed and gadwall are normally resident during summer. The numbers of nesting great crested grebe are of special significance with recent marked increases making the colony the largest in

Site Name	Approximate Location	Description
		Greater London and among the largest in Britain. Artificial raft islands anchored across the eastern reservoir arm attract another breeding species, common tern, and are used by waterfowl as loafing places. Further breeding species are recorded in the willow woodland, these include: bullfinch, greenfinch, jay, willow warbler and wren. The wetlands are also of interest for their plant communities. The swamps are characteristically dominated by a single species, mainly bulrush (Typha latifolia) and common reed (Phragmites australis). The fen communities comprise a complex mixture of many wetland plants including: lesser pond-sedge (*Carex acutiformis*), great willowherb (*Epilobium hirsutum*), meadow-sweet (*Filipendula ulmaria*), soft rush (*Juncus effuses*), gypsywort (*Lycopus europaeus*), water forget-me-not (*Myosotis scorpioide*s), reed canary-grass (*Phalaris arundinacea*), branched bur-reed (*Sparganium erectum*) and marsh woundwort (*Stachys palustris*). It is in this community type that most of the locally uncommon species are to be found, for example: water- plantain (*Alisma plantago-aquatica*), flowering rush (*Butomus umbellatus*), water dock (*Rumex hydrolapathum*) and lesser bulrush (*Typha angustifolia*). In winter the combination of secluded wetland, shallows and extensive open water serves to attract a wide range of waterfowl. Maximum counts of pochard and gadwall occasionally reach levels of national significance while wintering waders include snipe and jack snipe. The reservoir has also long been noted as one of the major wintering sites in Greater London for smew, the scarcest of the regularly wintering species of duck in Britain.
Non-Statutory		
Brent Reservoir (Welsh Harp) (SINC)	Immediately north of the site	As detailed above
Harp Island (SINC)	1.3 km West	This is a linear site following the courses of the River Brent and The Canal Feeder as they feed out of the Harp Reservoir. Due to the highly channelized nature of this section of the river Brent it does not qualify as NERC Section 41 habitat of principal importance status for rivers.

Site Name	Approximate Location	Description
		As the river leaves the reservoir it runs in a natural channel through willow woodland and scrub, with Crack Willow, other Willow species, Wild Privet, Elder, and Bramble dominating. A tall ruderal understorey of Common Nettle and Japanese Knotweed dominate the field layer. The riverbed along this section is wide and shallow, with raised shingle banks, riffles and pools, resulting in variable water flow rates and water depths which provide a diverse habitat for aquatic organisms. There is little aquatic vegetation and the channel is moderately shaded from overhanging trees. Heron and Grey Wagtail were seen here. Giant Hogweed is also present. Clearing the north-west Corner, the river enters a deep open concrete culvert with earth banks above. A small patch of emergent vegetation with Pendulous Sedge and Branched Bur Reed occurs on a small shingle bank. A line of Lombardy Poplar runs along the top of the western bank as the culvert starts, followed by a short row of Cypress trees. Ash and Sycamore with Hawthorn beneath dominate the rest of the watercourse, creating heavy shade over the river with only Stinging Nettle below.
Clitterhouse Playing Fields (SINC)	1.4 km East	This large recreation ground, near Brent Cross, is named after a farm which formerly occupied the land. Although most of the site is currently managed as a sports field, the hedgerows around the perimeter are relics of the farmland era. Tall, and largely unmanaged, they contain an interesting mixture of typical ancient hedgerow species such as crab apple (*Malus sylvestris*) and Midland and common hawthorns (*Crataegus laevigata*) and (*Crataegus monogyna*). There are also some fine old oak (*Quercus robur*) and ash trees (*Fraxinus excelsior*), together with suburban garden plants such as snowberry (*Symphoricarpus albus*) and lilac (*Syringa* sps) which have either been planted here or infiltrated from the surrounding gardens. The hedgerows attract birds such as blackcap and chaffinch, and mistle thrushes forage on the grass. A small stream flows in a concrete channel along the eastern edge of the park.
Old St Andrew's Churchyard, Kingsbury	1.6km west	Old St Andrew's Church dates from the 13th century, and is a Grade 1 Listed building. Old St Andrew's Churchyard is dominated by dense woodland of native species Wild Cherry,

Site Name	Approximate Location	Description
(SINC)		English Elm, Ash and Yew are the main tree species with the Yew occurring as clumps in several locations. The field layer is predominantly, and variously, Common Nettle, Cow Parsley, Bramble, Hogweed and Cleavers. On the edges of the paths small relic areas of a species-rich woodland flora survive with species of Violet, Prickly Sedge, Spiked Sedge , Forget-Me-Not, Wood Dock, Bluebell, Cuckoo Pint, Herb Robert and Meadow Vetchling. The eastern boundary of the churchyard is marked with a defunct hedgerow of Wild Privet and Hawthorn, with Sycamore, Lombardy Poplar, Ash and Ivy. Lack of management has resulted in the dominance of tall ruderal species in the field layer, with small relic patches of species-rich woodland flora around gravestones that have been cleared of the dominant vegetation. The stream runs in a steep sided gorge with no emergent vegetation on the banks. Himalayan Balsam grows here in patches.
Hendon Park and Northern Line Railway Cutting (SINC)	1.6km North East	A large, airy, hillside park offering fine views south across London, Hendon Park also offers a range of recreational facilities. The northern end of the park is more formal, with ornamental flowerbeds and rose gardens, and an attractive Holocaust Memorial Garden that provides a peaceful spot for quiet reflection. Small birds, such as long-tailed tit, chaffinch and greenfinch forage along the tall hedgerows between the various plots. The rest of the park is made up mainly of informal parkland, with mown grass and mature trees, especially London plane (*Platanus x hispanica*), lime (*Tilea x europaea*) and horse-chestnut (*Aesculus hippocastanum*). As part of the Millennium celebrations, school children planted a new block of native woodland near its western side. This will provide good habitat for birds when it matures. The park is a good spot for watching pipistrelle bats on a summer evening. The western edge of the park borders the Northern line railway, where the rail side vegetation of rough grassland with tall herbs and patches of woodland attracts birds like the great spotted woodpecker, goldcrest and summer-visiting chiffchaff.
Clarefield Park (SINC)	1.7km East	This small park has been developed on a former wasteland which grew up on a rubble-filled plot adjoining the North

Site Name	Approximate Location	Description
		Circular Road near Brent Cross. A children's playground, all-weather games pitch and informal recreation areas with mown grassland were constructed to provide much-needed facilities for the neighbouring community. The development also included beds of nectar-rich scented shrubs and a small wildlife pond. A band of coarse grassland from the former roughland was retained around the edges of the site. This contains typical urban wild flowers associated with sites that have had some buildings in the past, for example mugwort (*Artemisia vulgaris*), white melilot (*Meliliotus alba*), common mallow (*Malva sylvestris*), lesser burdock (*Arctium minus*), and broad-leaved everlasting pea (*Lathyrus latifolius*). Bees, butterflies, ladybirds and other insects are attracted to the wild flowers. Foxes are seen occasionally. Robin, wren and blackbird frequent the bushes and goldfinches are attracted to the seeding herbs. It is likely that frogs and newts breed in the pond.
Dudding Hill Loop between Cricklewood and Harlesden (SINC)	1.8km West	The railway line sides in the Borough of Brent have an important function as wildlife corridors linking numerous small sites to each other and allowing the movement of species around the sub-urban environment. The line sides are extremely similar in their habitat, with semi-natural broadleaved or mixed woodland forming the main habitat, with areas of tall ruderal vegetation. Generally a strip about a meter wide of semi-improved neutral grassland forms the interface between the tracks and the ruderal/woodland vegetation behind. Dudding Hill Loop southern section is predominantly the typical Ash, Oak, Maple woodland. The mid-section of the site is largely wooded but also has several large areas dominated by Japanese Knotweed. Passing through Fryent Country Park the lineside habitat is restricted in width and is mainly tall ruderal with scattered trees, merging into woodland again at the northern end of the site.
Dollis Hill Reservoir (SINC)	1.9km South West	At the top of a hill with views to the north across the Welsh Harp, this site has been recently developed as a covered reservoir. The grassland over the reservoir is kept fairly short, but the edges are rougher with seeded and established wild

Site Name	Approximate Location	Description
		flowers, along with young planted trees and shrubs. The flora includes salad burnet (*Sanguisorba minor*), lucerne (*Medicago sativa*), common knapweed (*Centaurea nigra*), hemlock (*Conium maculatum*), oxeye daisy (*Leucanthemum vulgare*) and selfheal (*Prunella vulgaris*). Red fescue (*Festuca rubra*) can be found amongst the more common grasses. The planted trees and shrubs include pedunculate oak (*Quercus robur*), hawthorn (*Crataegus monogyna*), blackthorn (*Prunus spinosa*), rowan (*Sorbus aucuparia*) and hazel (*Corylus avellana*). A fenced-off spinney lies to the south of the reservoir, within the private Neville Court flats. Dominated by sycamore (*Acer pseudoplatanus*), ivy (*Hedera helix*), bramble (*Rubus fruticosus* agg.) and common nettle (*Urtica dioica*), this provides a range of habitats for birds and insects, and complements the adjacent covered reservoir. On the opposite side of the reservoir from Brook Road lies an area of rough grassland and scattered trees, forming pleasant natural greenery around the housing estate in Pippin Close. Most of the trees are horse-chestnuts (*Aesculus hippocastanum*), with some elm (*Ulmus* sp.) and evergreen oak (*Quercus ilex*). This also makes a pleasant informal play area for children from the nearby houses, as well as providing a refuge for birds, insects and other wildlife.

Biodiversity Action Plans

UK Biodiversity Action Plans (BAPs) have been developed which set priorities for nationally important habitats and species. To support the BAPs, Species/Habitat Statements (otherwise known as Species/Habitat Action Plans) were produced that provide an overview of the status of the species and set out the broad policies that can be developed to conserve them. A list of priority species of conservation importance was also developed.

The UK BAP was succeeded in 2012 by the UK-Post 2012 Biodiversity Framework which informed the creation of the Biodiversity 2020 strategy; England's contribution towards the UK's commitments under the United Nations Convention of Biological Diversity.

Despite this, the UK BAP priority species lists and conservation objectives still remain valid through integration with local BAPs (which remain valid), and in the form of the Habitats and Species of Principle Importance list (as required under section 41 of the Natural Environment and Rural Communities (NERC) Act).

The UK BAP priority habitat, Lowland Mixed Deciduous Woodland was present immediately offsite.

Whilst habitats on site include a range of successional communities the combined total areas for these habitats does not qualify as s41 priority habitat 'Habitat on Previously Developed Land' which requires at least 0.25 hectares.

Local Biodiversity Action Plans (LBAPs) ensure that national action plans (the UK BAP/Biodiversity 2020) are translated into effective action at the local level and establish targets and actions for locally characteristic species and habitats.

London BAP

London BAP contains Species Action Plans (SAPs) and Habitat Action Plans (HAPs) with targets for conservation of specific species and habitats in Greater London. Aspects of the BAP of relevance to this report include:

- Bat SAP;
- House Sparrow (*Passer domesticus*) SAP;
- Stag beetle (*Lucanus cervus*) SAP; and
- Black Redstart (*Phoenicurus ochruros*) listed as an important species;
- Built Structures listed as a important habitat; and
- Woodland HAP immediately off site to the north.

Brent BAP

Brent BAP highlights the following HAPs of relevance to this report:

- The Built Environment HAP; and
- Woodland HAP immediately off site to the north.

Species Record

The information provided in the biological data search from GiGL identified records of a number of protected and BAP priority species within 2km search radius of the site. Among others, these include the following species of relevance to the site:

- West European Hedgehog (*Erinaceus europaeus*);
- European Water Vole (*Arvicola amphibius*);
- Swift (Apus apus); Starling (*Sturnus vulgaris*); Song thrush (*Turdus philomelos*); House sparrow and Black redstart;
- Bat species include common pipistrelle (*Pipistrellus pipistrellus*), soprano pipistrelle (*P. pygmaeus*), Nathusius' pipistrelle (*P.nathusii*), noctule (*Nyctalus noctula*), Daubenton's (*Myotis daubentonii*) and Natterer's (*Myotis nattereri*) and Brown Long-eared (*Plecotus auritus*).

The species listed above are primarily those known to be in the area that may be impacted by any proposals at the site, or that stand to benefit as a consequence of potential ecological enhancements at the site and inform site-specific mitigation and enhancement recommendations described in the following chapter.

4.2 DETAILED DESCRIPTION OF SITE: HABITATS

The habitats presented across the assessment site consist of the following Joint Nature Conservation Committee (JNCC) Phase 1 Habitat categories, as mapped at Figure A.1:

- Scattered Scrub (A2.2);
- Scattered trees (A3.1);
- Tall Ruderal (C3.1);
- Amenity grassland (J1.2);
- Ephemeral short perennial (J1.3);
- Introduced shrub (J1.4);
- Bare Ground (J4); and
- Building/Hardstanding (J3.6).

Scattered trees

There are scattered trees along the eastern perimeter of site comprising species, see Figure 4.1, such as ash (Fraxinus excelsior), cherry (*Prunus avium*), sycamore (*Acer pseudoplatanus*), English oak (*Quercus robur*) and beech (*Fagus sylvatica*).

Figure 4.1 Scattered Trees on western edge of the car park

Scattered scrub

There are pockets of bramble scrub and Rosa sp. within the tall ruderal habitat, see Figure 4.2.

Figure 4.2 Bramble scrub on site

Tall Ruderal

The tall ruderal habitat includes a range of common species which form a diverse habitat structure and include large stands of buddleja (*Buddleja davidii*), spear thistle (*Cirsium vulgare*), common ragwort (*Jacobaea vulgaris*), nettles (*Urtica dioica*), broom (*Cytisus scoparius*), hedge bindweed (*Calystegia sepium*), rosebay willow herb (*Chamaenerion angustifolium*), evening primrose (*Oenothera biennis*), goats rue (*Galega officinalis*), ribwort plantain (*Plantago lanceolata*), chickweed (*Stellaria media*), red dead nettle (*Lamium purpureum*), herb robert (*Geranium robertianum*), fat hen (*Chenopodium album*), Canadian fleabane (*Erigeron canadensis*) and green alkanet (*Pentaglottis sempervirens*). Amongst the tall ruderal vegetation were *Acer* sp. saplings.

Figure 4.3 Tall ruderal vegetation on site

Amenity Grassland

There are two small strips of amenity grassland on site which comprise species such as perennial rye grass (*Lolium perenne*), chickweed, daisy (*Bellis perennis*), white clover (*Trifolium repens*), black medick (*Medicago lupulina*) and ribwort plantain. See Figure 4.4 for an example of this habitat.

Figure 4.4 Amenity grassland strip along the western edge of the car park

Ephemeral/Short perennial vegetation

Ephemeral/short perennial vegetation was identified within areas of tall ruderal vegetation. There were also small pockets of ephemeral vegetation beginning to colonise areas of exposed concrete, species in these areas were observed from the boundary but appeared to be similar to Canadian fleabane and fat hen, see Figure 4.5.

Figure 4.5 Ephemeral/Short perennial vegetation (note Japanese knotweed in the background on site

Introduced shrub

There are large stands of Japanese knotweed (*Fallopia japonica*) (see Figure 4.5) and buddleja on site.

Bare Ground

There is a strip of bare ground on the eastern edge of the carpark where an area previously amenity grassland vegetation had been cleared, see Figure 4.6.

Figure 4.6 Bare ground along base of trees

Building/Hardstanding

There are five buildings (B1-B5) on site, four of which are in dilapidated states.

B1, see Figure 4.7, is comprised of a mixture of concrete slab walls and brick with an exposed steel frame and no roof. It appeared to be once a warehouse with an M shaped roof. It is attached to the lighting shop off site to the south. There is a large wooden exit door at the rear. Within the building was a stand of buddleja and ruderal vegetation.

Figure 4.7 Building B1

B2 is a derelict brick building with no roof and exposed steel frame, see Figure 4.8. It also appeared to be once a warehouse with an M shaped roof. There was a small area of building to the north which was more intact and had a flat roof. The exposed bricks had many cracks and crevices in and the internal areas were being colonised with large stands of buddleja, ferns and tall ruderal vegetation.

Figure 4.8 Building B2

B3 is a single-story building with a flat felt roof currently used for storage and appeared to previously be used as an office space, see Figure 4.9

Figure 4.9 Building B3

B4 was surveyed from the boundary and is a concrete building with bordered up windows and a garage door towards the rear and had no roof leaving an exposed pitched roof frame, see Figure 4.10.

Figure 4.10 Building B4

B5 was surveyed from the boundary and comprises a new built concrete block building with a corrugated roof. The building had new windows and a garage but no front door, see Figure 4.11.

Figure 4.11 Building B5

Hardstanding includes areas where previously development had been cleared and has yet to be colonised by plant species and a car park, see Figure 4.12.

Figure 4.12 Hardstanding on site

4.3 DETAILED DESCRIPTION OF SITE: SPECIES

Badger

The small sections of grass verges provide very limited value as foraging habitat for badgers however no signs of foraging were observed.

Off site, the adjacent woodland boundary had some value for badgers but no evidence of badger activity including active and inactive setts, latrines or footprints was identified from the site boundary and there were no records of badger setts within 2km of the site.

Therefore, the potential for the site to support badgers is **negligible**.

Bats

Foraging

The tall ruderal, scrub and scattered trees are likely to attract some invertebrate species of value for foraging bats. However, more valuable habitat for commuting and foraging bats exists immediately offsite over the Brent reservoir and surrounding woodland.

Overall, the site has **moderate** potential to support foraging bats.

Roosting

The buildings were internally and externally inspected for evidence of roosting bats where possible. Dilapidated buildings, B1, B2 and B4 possessed several opportunities of value for individual or small numbers of crevice dwelling bats within cracks in brickwork, gaps between bricks, areas of rotten or lifted wood, and gaps where the beams meet brickwork.

None of the trees on site have potential for roosting bats, being mostly too young or in good condition to have the required features such as holes and crevices.

Overall, three of the buildings on site had **moderate** potential to support roosting bats.

Great Crested Newts

The site is predominantly buildings and hardstanding and there is no suitable aquatic or terrestrial habitat on site. Furthermore, there are no records for Great Crested Newt GCN within 2km of the site.

Therefore, the site is considered to have **negligible** potential to support GCN.

Reptiles

The site is dominated by unsuitable habitat for reptiles such as building/hardstanding. There has limited value in the small areas of scrub habitat and tall ruderal habitat which had log piles that would be suitable refugia. However, the nearest records of reptiles are over 1km from the site and the site is isolated from other areas of suitable habitat and therefore dispersal onto site is unlikely.

The site is considered to have **negligible** potential to support reptiles.

Dormouse

There is no species rich hedgerow or woodland habitat on site suitable for dormouse. More suitable habitat exists off site in the woodland north of the site, however there are no records for dormice within 2km of the site.

As such, the site is considered **negligible** to support dormice.

Water Vole and Otter

There were no waterbodies or suitable habitat for water vole and otter on site, therefore the site is deemed **negligible** to support water vole and otter.

Birds

The holes and gaps in brickwork provide some nesting opportunities for birds such as house sparrow, however, no evidence of previous nesting or active nesting was observed during the survey. Suitable habitat for nesting also exists within the trees and shrub on site, particularly for small passerine species.

Therefore, the site has **moderate** potential for nesting birds.

Invertebrates

The site is likely to support a range of common invertebrate species within the tall ruderal habitat. During the survey a s41 cinnabar moth caterpillar was observed feeding on common ragwort, the key food source for the larval stage of this moth.

Therefore, the site has **confirmed presence** of notable invertebrate species, cinnabar moth.

Immediately, off-site the woodland has **high** potential to support stag beetle.

Invasive/Non-native species

A large area of Japanese knotweed, a Schedule 9 invasive plant species listed in the Wildlife and Countryside Act, 1981 (as amended) was located from a central area towards the woodland (target note 1 on Figure A.1).

Therefore, the site has **confirmed presence** of invasive species.

Other BAP Species

UK and London BAP species, bats, house sparrow and cinnabar moth have been addressed under their respective headings above.

The introduced shrub and scrub habitat provide some areas that would be suitable shelter for hedgehog however the site is isolated from other areas of suitable habitat and therefore dispersal onto site is unlikely.

Overall, asides from the BAP species previously mentioned, the site has **negligible** to support other UK or London BAP species.

5.0 EVALUATION AND DISCUSSION

5.1 BASELINE SUMMARY

The assessment site and its surroundings have potential to support the following ecological receptors of note, which could therefore be impacted upon by any future prospective development proposals, as indicated in Table 5.1 below. Comment on further recommendations for each receptor is provided; further detail and discussion can be found in Section 5.2 onward:

Table 5.1 Baseline Summary

Receptor	Presence/Potential Presence	Comments
Designated Sites: Statutory	Immediately to the north of the site	Immediately offsite along the northern boundary lies the woodland surrounding Brent Reservoir, a SSSI and LNR. Given its close proximity to the development, proposals should accordingly embed measures which address potential impacts of pollution events during construction. These measures could be described within a Construction Environmental Management Plan (CEMP), further details are provided in the section below. An Environmental Impact Assessment screening assessment is being undertaken by Triptych PD on operational impacts associated with the with the running of emergency generators and potential ecological impacts on the SSSI and will assess whether cumulative impact in addition to the previous phases of the development will have any potential ecological impacts on the SSSI.
Designated Sites: Non-Statutory	Immediately to the north of the site	Direct impacts are limited given the scale and scope of the proposals. The Brent Reservoir to the north of the site is also a SINC. Increased levels of pollution such as dust deposition and sediment run off would be minimal and insignificant given the existing use of surrounding land to the east, west and south. However, A CEMP would detail

Receptor	Presence/Potential Presence	Comments
		control measures required to avoid and mitigate the potential impacts in regard to pollution and drainage during site construction and operation. Further details are provided in the section below. No other non-statutory designated sites within 2km to the site that stand to be impacted.
Notable/Rare Habitats	Present immediately off site	The Woodland off site along the northern boundary meets the definition of BAP priority woodland habitat. This woodland is outside the redline boundary and will be protected therefore no mitigation or compensation recommendations are required for habitat loss. Due to the proximity of the development to this habitat recommendations have been made below to protect the woodland during construction.
Foraging bats	Moderate	Proposals will result in habitat loss and an increase in lighting on site. Measures to minimise the impacts and compensate for the loss are provided in the section below.
Roosting bats	Moderate	Three of the dilapidated buildings on site have moderate potential to support roosting bats. As such, further bat emergence/re-entry surveys are recommended to confirm the presence/likely absence of roosting bats. Data from this survey will be used to identify a detailed approach to mitigation.
Birds	Moderate	Habitats suitable to support nesting birds are present on site in the form of scattered trees and introduced shrub and some of the dilapidated features of the buildings. Further discussion is provided below.
Invertebrates	Confirmed presence	Presence of cinnabar moth caterpillar was recorded on site. Removal of suitable habitat will likely be needed to facilitate the

Receptor	Presence/Potential Presence	Comments
		development. Measures to compensate for the loss are provided in the section below.
Invasive/Non-native species	Confirmed presence	Further survey in relation to the invasive species found on site is not necessary. However, mitigation measures for removal and ensure the spread of this species in the wild is provided in the section below.

5.2 DISCUSSION AND RECOMMENDATIONS

Discussion is provided below on the key ecological receptors that stand to be impacted/benefit from proposed works; high level commentary on appropriate mitigation, compensation and enhancement actions is also provided.

An Ecological Management Plan (EMP) and Construction Environmental Management Plan (CEMP) should be produced and implemented for the site providing greater detail on the below, which should be secured through planning condition in accordance with BS 42020: 2013 Biodiversity.

Designated sites

Statutory

Immediately offsite along the northern boundary lies the woodland surrounding Brent Reservoir, a SSSI and LNR. Given its close proximity, to avoid indirect impacts of increased levels of pollution such as dust deposition and sediment run off a CEMP document should be secured through planning condition that will detail the control measures required to avoid and mitigate potential impacts in regard to pollution and drainage during site construction.

This report should be read in conjunction with the EIA screening assessment which considers the potential impacts of potential air quality impacts associated with the running of additional generators upon the adjacent Brent Reservoir SSSI and considers whether there is a cumulative impact considering the previous phases of the development. The assessment should be undertaken considering the critical levels and critical loads suggested in this report and associated predicted nitrogen deposition and airborne concentrations.

Non-Statutory

The woodland to the north is also a SINC. Proposals accordingly should embed measures which address the potential impact upon this site. These measures could be described within a CEMP. Specifically, how impacts through pollutant spillage and increased dust deposition should be managed during construction.

Notable/Rare habitats

Due to the close proximity of the woodland to the area proposed for development, measures to protect it from the proposed development should be included within the above-mentioned CEMP document.

Bats

Roosting

In accordance with The Bat Conservation Trust (BCT) guidelines two emergence/re-entry surveys are recommended for moderate value features to determine the presence/likely absence of roosting bats in the building.

Details on appropriate mitigation for roosting bats would be dependent upon findings of this survey.

Foraging

Impacts on foraging bats will be in the form of habitat loss on site and potential increased lighting levels on the woodland off site from external lighting associated with the development.

Compensatory wildlife friendly landscaping should be provided post development and designed to provide foraging resources, in line with best practice guidance[6]. This could include the use of landscaping containing herbaceous and night-scented species such as lavender (*Lavandula* sp.), jasmine (*Jasminum officinale*) and honeysuckle (*Lonicera periclymenum*).

A bat sensitive lighting strategy in accordance with best practice guidance should be implemented. Light levels over the woodland and woodland edge should be reduced or as a minimum remain the same as current light levels, where possible.

The BCT and Institute of Lighting Professionals (2019)[7] and Stone (2013)[8] provide guidance on lighting designs to avoid impacts to bats, and this guidance should be used throughout the design process, where possible. Specifically:

- Consider avoidance of metal halide and fluorescent light sources;
- Warmth' of luminaires - any external areas should incorporate light at a <2700K where possible, with peak wavelengths higher than 550nm;
- Use of screens/hoods to make any external lighting as directional as possible, to avoid light spill on any natural features;
- Height of lighting column - where possible, external lights should be as low to the ground as possible; and
- Lighting controls - appropriate controls to minimise the duration lights are illuminated should be installed.

By minimising the impacts of external lighting, impacts upon foraging and commuting bats should be sufficiently minimised.

Birds

Impacts upon nesting birds can be fully avoided through timing of works. Demolition and vegetation clearance should be undertaken outside of the nesting bird season (taken to run from March to August inclusive). If clearance within this window is not possible, a nesting bird check by a qualified ecologist would be required within 48 hours prior to clearance.

Compensatory nesting habitat should be provided in the form of shrub and trees within landscaping and hanging bird boxes on trees on site on north and east elevations at least 5m high.

Invertebrates

Cinnabar moth caterpillars feed exclusively on common ragwort and therefore this plant will be included in areas of wildflower meadow.

Invasive/Non-native species

Invasive plant species, Japanese knotweed, is listed on Schedule 9 of the Wildlife and Countryside Act (1981) and is confirmed on site. A specialist Japanese knotweed contractor should be commissioned who must ensure this plant is removed from site and disposed of following best practice guidance (DEFRA, 2016)[9].

5.3 ENHANCEMENTS

There are opportunities to enhance the ecological value of the site. Habitat should be created to provide value for priority species in line with local conservation objectives, such as the London BAP.

Specifically, the following enhancement features are recommended:

- Increase native species diversity and habitat provision should be included. A diverse mix of native species including those listed on the Royal Horticultural Society's Perfect for Pollinator lists[10,11] including hornbeam (*Carpinus betulus*), lavender (*Lavandula angustifolia*) and dogwood (*Cornus* sp.). This would stand to benefit a range of invertebrates, and would add value as bat foraging habitat;
- Wildlife-friendly landscaping – should also include species rich ground cover. This should incorporate species of known value to local BAP priority pollinators and include species on the RHS Perfect for Pollinator lists. Wildflower meadows could also be incorporated along the borders instead of amenity grassland and surrounding areas with trees providing nectar for pollinators. An example of a suitable seed mix would be Emorsgate EG2 mix or similar[12].
- Garden bird boxes should be incorporated on trees. These are best in sheltered locations and at a height between 2-4m with a clear flight path to the box. We would recommend bird boxes with entrance holes varying in size to attract a number of different species including an open fronted bird box to benefit black redstarts listed as an important species within the London BAP. Furthermore, boxes aimed at house sparrow and swift, a London and UK BAP species, can be grouped together as they tend to nest in loose colonies; and

- Invertebrate habitat features should be incorporated within landscaped areas to provide features of interest as well as ecological function. Solitary beehives and habitat panels should be placed in suitable locations in sunny areas. To further enhance the site for London BAP species stag beetles and other invertebrates, a stag beetle loggery should be created using wood from the site. The loggery should be positioned on the outskirts of the woodland off site.

A Biodiversity Impact Assessment (BIA) is being undertaken to ascertain how the development proposals perform with regards to national policy in relation to the delivery of Biodiversity Net Gain.

The development presents the opportunity to benefit a range of taxa through incorporation of ecological features and provision of new habitats that would encourage species to the site. Key actions should be included within EMP documents for the site which could be secured through planning condition.

6.0 SUMMARY & CONCLUSION

Greengage was commissioned by PDCG (Group Services) limited to undertake a PEA a site known as LON1B2 in the London Borough of Brent in order to establish the ecological value of this site and its potential to support notable and/or legally protected species.

The PEA identified value for a number of notable and protected species and habitats including:

- The Brent Reservoir Site of Special Scientific Interest (SSSI) and Local Nature Reserve (LNR), a statutory and non-statutory designated site, lies immediately north of the site;
- UK BAP habitat Lowland Mixed Deciduous Woodland lies immediately north of the site;
- Moderate potential for roosting bats in the large, dilapidated building on site;
- High value bat foraging habitat associated with the tall ruderal habitat, woodland and woodland edge immediately north of the site;
- Nesting bird potential in the scrub, dilapidated building, introduced shrub and scattered trees;
- Confirmed presence of s41 priority invertebrate species cinnabar moth caterpillars were identified on the common ragwort; and
- Confirmed presence of invasive species Japanese knotweed.

Key mitigation, compensation and enhancement actions are described to enable legislative and policy compliance (see context at Appendix B), aiming to achieve net gains in biodiversity for the site.

Key actions should be included within EMP and CEMP documents for the site which could be secured through planning condition.

APPENDIX A SITE PLAN AND HABITAT MAP

Figure A.1 Phase 1 Habitat Plan

LON1B2

- Approximate Site Boundary
- Broadleaved woodland
- Scrub - scattered
- Tall ruderal
- Amenity grassland
- Ephemeral/short perennial
- Introduced shrub
- Buildings
- Bare ground
- Hardstanding
- scattered trees
- Japanese Knotweed
- Target Notes

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Figure 1.0 Site Plan and Habitat Map

Project Number 551767
February 2022
1 to 1,100 at A3
[Map data: Google Satellite]

APPENDIX B SITE PHOTOGRAPHS

Figure B.1 Internal areas of B1

Figure B.2 Internal areas of B1

Figure B.3 the north elevation of B1 with scrub outside

Figure B.4 The north elevation of B1

Figure B.5 Gap between soffit and fascia on B1

Figure B.6 Tall ruderal with pockets of bramble scrub

Figure B.7 B2 with tall ruderal vegetation

Figure B.8 tall ruderal habitat surrounding B2

Figure B.9 The interiors of B2

Figure B.10 The interior of B2

Figure B.11 The interiors of B2 with gaps surrounding the beam

Figure B.12 B2 interior showing gaps under bordering and surrounding beams

Figure B.13 Gaps within the bricks on eastern elevation of B2

Figure B.14 B3 and scrub vegetation

Figure B.15 Interior of B2

Figure B.16 Small loft space in B2

Figure B.17 B3 exterior

Figure B.18 B3 exterior

Figure B.19 B4 exterior

Figure B.20 B4 exterior

Figure B.21 Tall ruderal habitat

Figure B.22 Scrub and tall ruderal habitat

Figure B.23 Tall ruderal with Japanese knotweed in the background

Figure B.24 Tall ruderal and three pockets of Japanese knotweed

Figure B.25 Amenity grassland strip with scrub

Figure B.26 Scattered trees

Figure B.27 Japanese knotweed and exposed/concrete hardstanding

APPENDIX C RELEVANT LEGISLATION AND POLICY

C.1 LEGISLATION

Current key legislation relating to ecology includes the Wildlife and Countryside Act 1981 (as amended)[13]; The Conservation of Habitats and Species Regulations 2019 ('Habitats & Species Regulations')[14], The Countryside and Rights of Way Act 2000 (CRoW Act)[15], and The Natural Environment and Rural Communities Act, 2006[16].

The Environment Act, 2021

The Environment Act, 2021 mandates the requirement for new development in England to deliver a minimum 10% biodiversity net gain (BNG), as measured by the agreed metric (the current relevant version being the Defra metric 3.0), secured through planning condition as standard (as per schedule 14 of the Act). Approach to the delivery of BNG must follow the mitigation hierarchy, with avoidance of impact and on-site compensation/gains prioritised, ahead of the use of offsite biodiversity unit offsets, or the purchase of biodiversity credits.

The Act introduces the condition that no development may begin unless a biodiversity net gain plan has been submitted and approved by the local planning authority (LPA).

The Act also amends requirements of the NERC Act, 2006, adding the need to not just conserve, but enhance biodiversity through planning projects. Furthermore, it introduces the need for the LPA to have regard to relevant local nature recovery strategies and relevant species/protected site conservation strategies, when making their decision.

The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019

The Conservation of Habitats & Species Regulations replace The Conservation (Natural Habitats, etc.) Regulations 1994 (as amended)[17], and transpose Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora ('EU Habitats Directive')[18], and Council Directive 79/409/EEC on the Conservation of Wild Birds ('Birds Directive')[19] into UK law (in conjunction with the Wildlife and Countryside Act).

Regulation 43 and 47 respectively of the Conservation of Habitats & Species Regulations makes it an offence (subject to exceptions) to deliberately capture, kill, disturb, or trade in the animals listed in Schedule 2 (European protected species of animals), or pick, collect, cut, uproot, destroy, or trade in the plants listed in Schedule 5 (European protected species of plant). Development that would contravene the protection afforded to European protected species requires a derogation (in the form of a licence) from the provisions of the Habitats Directive.

Regulation 63 (1) states: 'A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which —

(a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects); and

(b) is not directly connected with or necessary to the management of that site;

must make an appropriate assessment of the implications for that site in view of that site's conservation objectives.'

Wildlife and Countryside Act 1981 (as amended)

The Wildlife and Countryside Act 1981 (as amended) is the principal mechanism for the legislative protection of wildlife in Great Britain. This legislation is the means by which the Convention on the Conservation of European Wildlife and Natural Habitats[20] (the 'Bern Convention') and the Birds Directive and EU Habitats Directive are implemented in Great Britain.

The Countryside and Rights of Way Act 2000

The Wildlife and Countryside Act has been updated by the CRoW Act. The CRoW Act amends the law relating to nature conservation and protection of wildlife. In relation to threatened species it strengthens the legal protection and adds the word 'reckless' to the offences of damaging, disturbing, or obstructing access to any structure or place a protected species uses for shelter or protection, and disturbing any protected species whilst it is occupying a structure or place it uses for shelter or protection.

The Natural Environment and Rural Communities Act 2006

The Natural Environment and Rural Communities Act 2006 states that every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity. Biodiversity Action Plans provide a framework for prioritising conservation actions for biodiversity.

Section 41 of the Natural Environment and Rural Communities Act requires the Secretary of State to publish a list of species of flora and fauna and habitats considered to be of principal importance for the purpose of conserving biodiversity. The list, a result of the most comprehensive analysis ever undertaken in the UK, currently contains 1,149 species, including for example, hedgehog (Erinaceus europaeus), and 65 habitats that were listed as priorities for conservation action under the now defunct UK Biodiversity Action Plan[21] (UK BAP). Despite the devolution of the UK BAP and succession of the UK Post-2010 Biodiversity Framework[22] (and Biodiversity 2020 strategy[23] in England), as a response to the Convention on Biological Diversity's (CBD's) Strategic Plan for Biodiversity 2011-2020[24] and EU Biodiversity Strategy (EUBS)[25], this list (now referred to as the list of Species and Habitats of Principal Importance in England) will be used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under section 41 of the Natural Environment and Rural Communities Act 2006 'to have regard' to the conservation of biodiversity in England, when carrying out their normal functions.

Biodiversity Action Plans

Non-statutory Biodiversity Action Plans (BAPs) have been prepared on a local and regional scale throughout the UK over the past 15 years. Such plans provide a mechanism for implementing the government's broad strategy for conserving and enhancing the most endangered ('priority') habitats and species in the UK for the next 20 years. As described above the UK BAP was succeeded in England by Biodiversity 2020 although the list of priority habitats and species remains valid as the list of Species of Principal Importance for Nature Conservation.

Regional and local BAPs are still valid however and continue to be updated and produced.

Detail on the relevant BAPs for this site are provided in the main text of this report.

Legislation Relating to Nesting Birds

Nesting birds, with certain exceptions, are protected from intentional killing, destruction of nests and destruction/taking of eggs under the Wildlife and Countryside Act 1981 (as amended) and the CRoW Act. Any clearance of dense vegetation should therefore be undertaken outside of the nesting bird season, taken to run conservatively from March to August (inclusive), unless an ecologist confirms the absence of active nests prior to clearance.

Legislation Relating to Bats

All UK bats and their roosts are protected by law. Since the first legislation was introduced in 1981, which gave strong legal protection to all bat species and their roosts in England, Scotland and Wales, additional legislation and amendments have been implemented throughout the UK.

Six of the 18 British species of bat have Biodiversity Action Plans (BAPs) assigned to them, which highlights the importance of specific habitats to species, details of the threats they face and proposes measures to aid in the reduction of population declines.

Although habitats that are important for bats are not legally protected, care should be taken when dealing with the modification or development of an area if aspects of it are deemed important to bats such as flight corridors and foraging areas.

The Wildlife & Countryside Act 1981 (WCA) was the first legislation to provide protection for all bats and their roosts in England, Scotland and Wales (earlier legislation gave protection to horseshoe bats only.)

All eighteen British bat species are listed in Schedule 5 of the Wildlife and Countryside Act, 1981 and under Annexe IV of the Habitats Directive, 1992 as a European protected species. They are therefore fully protected under Section 9 of the 1981 Act and under Regulation 43 of the Conservation of Habitats and Species Regulations 2017, which transposes the Habitats Directive into UK law. Consequently, it is an offence to:

- Deliberately capture, injure or kill a bat;
- Intentionally or recklessly disturb a bat in its roost or deliberately disturb a group of bats;

- Damage or destroy a bat roosting place (even if bats are not occupying the roost at the time);
- Possess or advertise/sell/exchange a bat (dead or alive) or any part of a bat; and
- Intentionally or recklessly obstruct access to a bat roost.

This legislation applies to all bat life stages.

The implications of the above in relation to the proposals are that where it is necessary during construction to remove trees, buildings or structures in which bats roost, it must first be determined that work is compulsory and if so, appropriate licenses must be obtained from Natural England.

C.2 PLANNING POLICY

National

National Planning Policy Framework

The National Planning Policy Framework (NPPF) 2021[26] sets out the Government's planning policies for England, including how plans and decisions are expected to apply a presumption in favour of sustainable development. Chapter 15 of the NPPF focuses on conservation and enhancement of the natural environment, stating plans should 'identify and pursue opportunities for securing measurable net gains for biodiversity'.

It goes on to state: 'if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused'. Alongside this, it acknowledges that planning should be refused where irreplaceable habitats such as ancient woodland are lost.

Regional

The London Plan[27]

Policy G1 Green infrastructure

1. London's network of green and open spaces, and green features in the built environment such as green roofs and street trees, should be protected, planned, designed and managed as integrated features of green infrastructure.
2. Boroughs should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation.
3. Development Plans and Opportunity Area Planning Frameworks should:
    1. identify key green infrastructure assets, their function and their potential function
    2. identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.

4. Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.

Policy G5 Urban greening

5. Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
6. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development. (excluding B2 and B8 uses).
7. Existing green cover retained on site should count towards developments meeting the interim target scores set out in (B) based on the factors set out in Table 8.2.

Policy G6 Biodiversity and access to nature

8. Sites of Importance for Nature Conservation (SINCs) should be protected.
9. Boroughs, in developing Development Plans, should:
    a. use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks
    b. identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them
    c. support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans
    d. seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context
    e. ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.
10. Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:
    a. avoid damaging the significant ecological features of the site
    b. minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site

c. deliver off-site compensation of better biodiversity value.

11. Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
12. Proposals which reduce deficiencies in access to nature should be considered positively.

Policy G7 Trees and woodlands

13. London's urban forest and woodlands should be protected and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees.
14. In their Development Plans, boroughs should:
    a. Protect 'veteran' trees and ancient woodland where these are not already part of a protected site
    b. Identify opportunities for tree planting in strategic locations
15. Development proposals should ensure that, wherever possible, existing trees of quality are retained [Category A and B]. If planning permission is granted that necessitates the removal of trees, there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

London Environment Strategy 2018[28]

The Mayor's Environment Strategy was published in May 2018. This document sets out the strategic vision for the environment throughout London. Although not primarily a planning guidance document, it does set strategic objectives, policies and proposals that are of relevance to the delivery of new development in a planning context, including:

Objective 5.1 Make more than half of London green by 2050

Policy 5.1.1 Protect, enhance and increase green areas in the city, to provide green infrastructure services and benefits that London needs now.

This policy states:

"New development proposals should avoid reducing the overall amount of green cover and, where possible, seek to enhance the wider green infrastructure network to increase the benefits this provides. [...] New developments should aim to avoid fragmentation of existing green space, reduce storm water run-off rates by using sustainable drainage, and include new tree planting, wildlife-friendly landscaping, or features such as green roofs to mitigate any unavoidable loss".

This supports the 'environmental net gain' approach promoted by government in the 25 Year Environment Plan.

Proposal 5.1.1.d The London Plan includes policies to green streets and buildings, including increasing the extent of green roofs, green walls and sustainable drainage.

Objective 5.2 conserving and enhancement wildlife and natural habitats

Policy 5.2.1 Protect a core network of nature conservation sites and ensure a net gain in biodiversity

This policy requires new development to include new wildlife habitat, nesting and roosting sites, and ecologically appropriate landscaping will provide more resources for wildlife and help to strengthen ecological corridors. It states:

"Opportunities should be sought to create or restore priority habitats (previously known as UK Biodiversity Action Plan habitats) that have been identified as conservation priorities in London [and] all land managers and landowners should take BAP priority species into account".

Local

Brent Core Strategy

Open Space & the Environment Objective 9

To protect and enhance Brent's environment - by

- Preserving the borough's open spaces for recreation and biodiversity. Creating new and enhanced open spaces to address deficiencies where possible, but particularly to meet the needs of additional population commensurate with current levels of provision
- Increasing the amount of public open space in the borough (and at least 2.4ha within Wembley) and the amount of land with enhanced ecological value

Enhancing the borough's green and blue infrastructure by tree planting, returning rivers to their more natural courses and mitigating the pollution effects of development.

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Our ref: 551767ltSep22FV02_Letter

Dear Laura

LON1B3 ECOLOGY INPUT FOR EIA SCREENING

Greengage were commissioned by Pure Data to undertake an updated Preliminary Ecological Appraisal and Phase II Bat surveys for the LON1B3 Development, in the London Borough of Brent.

The development seeks construction of a data centre extension of five storeys plus a plant level with a ground coverage of circa 11165sqm including re-configuration of parking on a site area of 3.6ha. This document is to inform the EIA Screening report. The development area includes land parcels known as Inngrays North, Vanguard and Selco.

Greengage have previously undertaken a Preliminary Ecological Appraisal on the Inngrays North Site on 15th July 2021 which comprises derelict buildings, pockets of scrub, tall ruderal and large stands of invasive/non-native species such as Japanese Knotweed (*Fallopia japonica*) and Buddleja sp. (report ref: 551767ltMar22FV03_PEA_LON1B2).

From the author's familiarity of the site and a review of satellite imagery it is known that Vanguard and Selco are predominantly building/hardstanding.

This letter report details the ecological constraints and recommendations given following the 2021 PEA. As site conditions are likely to be similar, Greengage do not anticipate additional ecological constraints will arise. Therefore, the previous findings and recommendations are considered sufficient to be used to inform the EIA Screening. However, this will be confirmed following the updated PEA scheduled for 29th September 2022.

Preliminary Ecological Appraisal 2021

Results

Greengage undertook an initial Preliminary Ecological Appraisal in July 2021 which covered the Inngrays North Site and identified the following:

- The derelict buildings on site have moderate potential for bats and requires emergence/-re-entry surveys in accordance with best practice guidance. Interim bat survey results are provided in the section below;
- The presence of the SSSI north of the site will need to be considered as per previous applications;
- There is confirmed presence of Japanese Knotweed on site, this will need to be removed from site and disposed of following best practice guidance (DEFRA, 2014);
- The trees and scrub have potential for nesting birds, clearance should be undertaken outside of nesting bird season (March-August, inclusive) unless confirmed absent by a suitably qualified ecologist within 48 hours of site clearance;
- Confirmed presence of notable invertebrates within the tall ruderal habitat, the cinnabar moth (*Tyria jacobaeae*) caterpillars were identified on the common ragwort (*Jacobaea vulgaris*) on site. Cinnabar moths are a s41 priority species and habitat for them should be provided for this species post development.

Recommendations

This report should be read in conjunction with the EIA screening assessment which assesses the operational impact of the development and whether potential changes to air quality will have an impact on the adjacent SSSI. This assessment will inform whether a formal Ecological Impact Assessment is required.

Any impacts upon the adjacent designated site, the Brent Reservoir, associated with construction should be fully avoided/mitigated through the implementation of a Construction Environment Management Plan (CEMP), including information on pollution control measures and an ecologically sensitive lighting strategy following best practice guidance. The CEMP should be secured through planning condition.

A bat emergence/re-entry survey should be undertaken on the buildings with moderate bat potential to assess presence/likely absence and inform any mitigation required.

Compensatory foraging habitat should be provided for areas of suitable habitat lost and a bat sensitive lighting scheme should be in place to ensure light spill onto the adjacent woodland does not exceed existing light levels, and where possible reduces it, to maintain its potential value for foraging and commuting bats.

The trees, scrub, introduced shrub, and dilapidated buildings, have potential for nesting birds., Clearance and demolition should be undertaken outside of nesting bird season (March-August, inclusive) unless confirmed absent by a suitably qualified ecologist within 48 hours of site clearance.

Compensatory habitat should be provided for any loss of cinnabar moth habitat.

Japanese Knotweed will need to be removed from site and disposed of following best practice guidance (DEFRA, 2016).

The development should aspire to a minimum of 10% net gain in biodiversity. Given the natural habitats present and the nature of the proposals, this may be difficult to achieve on site without the consideration of biodiverse roofs, tree planting and landscaping.

A stand-alone PEA will be produced following the updated site visit which will detail necessary mitigation, compensation and enhancement which should be factored into design and approach at site.

Bat Emergence Surveys

Methodology

The details received in a desk top study and observations from the PEA identified the dilapidated buildings on site possessed several opportunities of value for crevice dwelling bats within cracks in brickwork, gaps between bricks, areas of rotten or lifted wood, and gaps where the beams meet brickwork.

Given the legal protection afforded to bats, In accordance with the Bat Conservation Trust (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines[1] the requirement for a two emergence/re-entry surveys on roosting features was confirmed. This survey is required in order to determine presence/ likely absence of roosting bats on site.

The emergence survey commenced 15 minutes before sunset and continued for 1.5 hours after sunset.

Each surveyor was equipped with BatBox Duet Heterodyne detectors and an Echo Meter Touch bat detector to detect, visualise and record the calls of any bats present in the area. Additionally, an infrared Canon xa11 camera, alongside 2 night fox torches and a recording Echo Meter Touch detector was used and the footage was reviewed by a surveyor.

There were issues with site acquisition which meant that the Inngrays site was inaccessible and the only locations that could be surveyed in May and June were those along the site boundary. The site was acquired later in the summer and the remaining surveys could be undertaken in September which is outside of the optimal survey season but undertaken during suitable weather conditions and therefore not considered to be a major constraint.

Survey results

The emergence surveys were undertaken during suitable weather conditions in May, June and September. The first September survey was cancelled mid-survey due to unforeseen rain and rescheduled for the 29th September.

Date	Surveyors	Sunset	Timings	Temperature	Weather Conditions
16/05/2022	Laura Thomas Laura Suckley Hazel Cucenca	Sunset: 20:47	Start: 20:32 End: 22:17	Start temp: 17°C End temp: 16°C	60% Cloud Dry 13km/hr wind
22/06/2022	Laura Suckley Hazel Cucenca Infrared Camera reviewed by Tom Haley	Sunset: 21:23	Start: 21:08 Finish: 22:53	Start: 20°C End: 16°C	Clear, No clouds Dry 3km/hr wind
08/09/2022	Laura Thomas Sarah White Jordan McNulty Nathasha OConnor Jesse Aberach Adam Daniels Sinead Moss Samuel Hillier 4x Infrared cameras	Sunset: 7:31pm	Start time: 19:16 Finish: 21:01	Start temp: 17°C	Cloudy 17km/wind **Cancelled** due to forecasted rain at (20:20)
15/09/2022	Sarah White George Fuller Victoria Mercier Jess Malim Justin Isip Natasha OConnor Sinead Moss Adam Daniels Jesse Aberach 4x Infrared cameras	Sunset: 19:15	Start time: 19:00 Finish: 20:45	Start temp: 17°C End temp: 16°C	Dry, Overcast 9km/hr wind
Results					
Date	Surveyor	Time	Species	Behaviour	Comments
16/05/2022	No bat activity recorded				

22/06/2022	Laura Suckley	22:21	Common pipistrelle	Pass	Heard Not Seen
22/06/2022	Laura Suckley	22:21	Common pipistrelle	Pass	Heard Not Seen
08/09/2022	Laura Thomas, Natasha OConnor, Jesse Aberach, Adam Daniels	20:09	Noctule	Pass	Heard Not Seen
15/09/2022	George Fuller, Laura Suckley, Natasha OConner, Matt Granger, Jesse Aberach	19:44	Noctule	Pass	Heard Not Seen
15/09/2022	Laura Suckley	20:07	Lesiler's	Pass	Heard Not Sean

The following key findings were observed:

- No emergences from the buildings on site; and
- Low commuting behaviour of common pipistrelle (*Pipistrellus pipistrellus*), noctule (*Nyctalus noctula*) and Lesiler's bats (*Nyctalus leisleri*).

A standalone bat survey report will be produced following the final survey which will detail any necessary mitigation, compensation and enhancement concepts which should be factored into design and approach at site.

Yours sincerely

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For and on behalf of Greengage Environmental Lt

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