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15th December 2022

Dear Stantec,

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

Proposal: Request for Screening Opinion as to whether an EIA is required in respect of an application for the proposed redevelopment including the demolition of existing buildings, and replacement with a residential-led development, comprising up to 1,550 new dwellings and 5,000sq.m. of flexible commercial/community floorspace, including buildings up to 28 storeys in height, spread across 4ha of land, in addition to landscaping works and ~50 parking spaces.

Site: College of North West London, Dollis Hill

I write in connection to your screening request submitted on 28th November 2022. Reference has been made to Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations') "Requests for screening opinions of the relevant planning authority".

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

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

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

Yours sincerely,

Paul Lewin
Team Leader Planning Policy

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

Description of proposed development – The proposed redevelopment including the demolition of existing buildings, and replacement with a residential-led development, comprising up to 1,550 new dwellings and 5,000sq.m. of flexible commercial/community floorspace, including buildings up to 28 storeys in height, spread across 4ha of land, in addition to landscaping works and ~50 parking spaces.

Site – College of North West London, Dollis Hill

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

Introduction

Stantec, on behalf of Dollis Hill Wembley LLP, requested a screening opinion from London Borough of Brent (the Council) on 28th November 2022. Associated with this request details of the site boundary, proposed development and an initial assessment of the potential impacts of the proposed development taking account of associated submitted technical studies were submitted to support the request.

The Existing Site and Surrounding Area

The site occupies part of Brent Local Plan site allocation and Growth Area BEGA1 (Neasden Stations Growth Area). It comprises the College of Northwest London (CNWL) site 3 from the associated Neasden Stations masterplan Supplementary Planning Document for the Growth Area. This is the largest site in the Growth Area, and currently comprises the existing college buildings, the capacity of which will be relocating to a site in Wembley Park prior to its demolition. The existing buildings on site are all college buildings, and range in height from 1 to 5 storeys. There is a significant amount of hardstanding for access and parking, as well as general scrub in the east of the site adjacent to Dudden Hill Lane.

The site is bounded to the north by the Jubilee/Metropolitan LUL, to the east by Dudden Hill Lane, the south by Denzil Road, and the west by Selbie Avenue. The site is accessible via Dudden Hill Lane in the east, Denzil Road in the south, and Selbie Avenue in the west. There are a mix of uses adjacent to the site, but predominantly uses including terraced housing to the east, south and west, as well as mixed use flatted development to the north beyond the railway line. The residential area to the west is also included within the Growth Area as site 3a. Beyond the residential terraces along Denzil Road lies the Church End Growth Area (CEGA), which currently comprises industrial uses either side of Brenthurst Road. Like Neasden Stations Growth Area, the CEGA will be subject to a forthcoming masterplan, currently being drafted, which will set out how the area is to be redeveloped to deliver a mix of uses, including industrial reprovision and the delivery of ~1,300 new homes.

The site is well connected by public transport, achieving a Public Transport Accessibility Level (PTAL) of 3-4. This reflects the site's close proximity to Dollis Hill and Neasden LUL stations, providing access to the Jubilee line which runs north-west to Wembley and Stanmore, and south-east to central London. The site is also within close proximity to a number of bus routes along Dudden Hill Lane and Neasden Lane.

The site is not within a Conservation Area or Site of Archaeological interest, and neither does it include any listed buildings. The closest listed buildings include the Locally Listed

Shortcroft Mead Court approximately 50m to the east, the grade II* listed Church of St. Mary 275m to the south, and the Grade II listed Willesden Jewish Cemetery 400m to the south.

The site is wholly within Flood Zone 1 for fluvial and tidal, although it does have small areas which are within Flood Zone 3a for surface water flooding. The site includes limited green infrastructure, including incidental green verges with shrubbery and trees, particularly adjacent to Denzil Road in the south, the LUL in the north, around the car park in the west, and adjacent to Dudden Hill Lane in the east. None of the trees are protected by a Tree Protection Order (TPO). The site itself includes no open space or nature conservation designations. The closest designations include the Railway tracks and sidings to the north which is a designated Wildlife Corridor, and two small open spaces including Denzil Road pocket park to the west along Selbie Avenue, and Willesden Community Garden to the east occupying the corner of Denzil Road and Dudden Hill Lane.

The site is also within an Air Quality Management Area, and a Brent Air Quality Action Area.

The Size and Design of the Proposed Development
The proposed redevelopment of the site is to include the demolition of the existing college buildings, and replacement with a residential-led development, comprising up to 1,550 new dwellings and 5,000sq.m. of flexible commercial/community floorspace. Proposed development will include buildings up to 28 storeys in height, spread across 4ha of land, in addition to landscaping works and ~50 parking spaces. As existing, the site will be accessible from Dudden Hill Lane, Denzil Road, and Selbie Avenue.

Information Provided in Support of the Request for a Screening Opinion
The request for screening opinion has been submitted with a supporting statement, site location plan, preliminary ecological appraisal and external bat scoping survey, and a noise and vibration impact assessment setting out an analysis of the likely environment effects of the proposal. This information has been utilised, as necessary, to inform this EIA Screening Opinion.

Previous History
It is important to consider both the existing and approved land use for the proposed development.

Large Scale Development within the Vicinity

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

Chancel House (19/2804) - Demolition of existing buildings and construction of a secondary school with sixth-form arranged in a 5 storey building incorporating a multi-use games area (MUGA) at roof level and incidental works to include landscaping, play-areas, means of enclosure, access and car and cycle parking and subject to a Deed of Agreement dated 21 May 2021 under Section 106 of the Town and Country Planning Act 1990, as amended (Granted 21/05/2021) – **started.**

19 Dudden Hill Lane (19/2688) - Demolition of the existing two-storey building and structures associated with the adjacent recreational sites and construction of a part 4-storey and part 5-storey building comprising D1 use on the ground floor and 29 residential units from part-ground to 4th floors. Works to include creation of communal roof terraces at 4th floor level,

mechanical plant room, 48 cycle parking spaces, waste storage and associated landscaping. (Granted 23/01/2020) – **started.**

39A-B, 41, 43-47 Dudden Hill Lane & car park Villiers Road, NW10 (19/1095) - Demolition of existing buildings and erection of a part 4 storey, part 5 storey building with Learie Constantine community centre (Use Class D1) on ground floor and 26 self-contained flats above (12 x 1 Bed, 7 x 2 Bed and 7 x 3 bed), provision for balcony amenity, and associated landscaping. (Granted 17/10/2019) – **started.**

205-211 ODDS Inc, 235 & Land in Church Road Car Park rear of 205- 235 Church Road, London, NW10 (13/2213) - Full planning permission sought for demolition of buildings within 205 and 235 Church Road, and redevelopment of section of Church End car park site to the rear of 207-233(odds inc.) Church Road to erect a part 2,3,4,5 and 6-storey building containing 65 residential units, 298m2 (GEA) retail floorspace, together with 7 car parking spaces and associated works as revised by plans and details and subject to a Deed of Agreement dated 5 May 2017 under Section 106 of the Town and Country Planning Act 1990, as amended. (Granted 16/05/2017) – **started.**

Church Road Car Park rear of 189-203, Church Road, London (13/1098) - Demolition of 205 Church Road and proposal of new market square to replace Eric Road. Demolition of 3 storey building to the rear of 203 Church Road and proposal of 34 residential dwellings and ground floor non-residential space (class A1/A3/B1/D1). Stopping up of Eric Road as revised by plans. (Granted 10/02/2017) – **started.**

Other Environmental Assessments

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

Development Plan

The Brent Local Plan (2019 – 2041) was adopted at Full Council on the 24th February 2022 and is the key strategic document to guide and manage development in the borough. The development plan also comprises the West London Waste Plan (2015) and the London Plan (2021). Together these documents provide spatial policies, development management policies and site allocations to guide and manage development in the borough.

An Integrated Impact Assessment (IIA) accompanies the Local Plan, which incorporates the SA and SEA – that consider the potential for significant economic, social and environmental effects. This document has been considered when generating the EIA Screening Opinion. The SAs satisfied the requirements of the EC Directive 2001/42/EC and Strategic Environmental Assessment (SEA) Regulations on the assessment of the effects of certain plans and programmes on the environment.

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

Masterplan / SPDs

The site lies within the Neasden Stations Masterplan Area for the Local Plan Neasden Stations Growth Area (BEGA1). This Supplementary Planning Document (SPD) was adopted in April 2022. The masterplan provides the framework for the redevelopment of the Growth Area to provide a new mixed-use community, including industrial intensification, and the delivery of at least 2,000 new homes, and the general regeneration and improvement of the area.

Legislation

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

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

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

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

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

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

The proposed development is for approximately 1,550 residential units. As such, it exceeds the threshold for 150 dwellings, and therefore the proposed development therefore constitutes 'Schedule 2 development'.

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

Likely Significant Effects

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

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

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

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

Appendix A – Consideration of Likely Significant Effects

Air Quality

The site is located within the Brent Air Quality Management Area (AQMA). The majority of Brent has been designated as an AQMA, and therefore even small increases in emissions can lead to adverse effects. The AQMA has been declared for exceedance of the annual mean national objective for nitrogen dioxide (NO2) and the 24 hour mean national objective for particulate matter (PM10). The site is also located within a Brent Air Quality Action Area due to the extent to which it exceeds these limits, and its potential to mitigate against this impact and improve local air quality significantly.

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

Documentation Accompanying the Planning Application: The applicant has noted that a Construction Environmental Management Plan (CEMP) will accompany the planning application. In addition to this, the applicant notes that an Air Quality Neutral Statement will be submitted. Due to the site's location within a Growth Area, the policy expectation is that the development will be air quality positive.

<u>Construction</u>

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

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

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

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

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

<u>Operation</u>

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

The EIA screening document notes that the application is to include 50 parking spaces, providing a low parking ratio, to meet disabled parking needs, of 3%. Given the proposed development will replace what includes large areas of level parking for the operational college, additional emissions upon existing vehicle movements will be minimal, if not reduced, and therefore effects are not considered to be significant.

The accompanying screening document does not make reference to the proposed heating system for the development, which can alter the operational impacts upon air quality. Given it is within an AQMA, and Growth Area, it is anticipated that this will utilise a decentralised system and as such should not incur significant impacts upon air quality.

With respect to the new internal receptors, consideration must be given to the site location within an AQMA. Based on the outcome of the air quality assessment, mitigation measures would be required in order to mitigate the impact of poor air quality on the future occupants of the proposed development at nearly all the modelled receptor locations.

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

Mitigation

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

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

Suitable operational mitigation to be secured through a planning condition to ensure that new internal receptors are adequately protected.

Archaeology

There is a Site of Archaeological Importance ~300m to the south west, and ~200m to the south however, the site itself is not located within an area of Archaeological Interest.

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

Construction

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

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

Operation

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

Mitigation

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

Built Heritage

Documentation Accompanying the Planning Application: A Heritage, Townscape and Visual Impact Assessment should accompany the planning application and should identify the extent to which the development impacts on skyline and protected views. The National Stadium is subject to local policy for protection of views to it from various locations across the borough, although the site itself is not within a protected viewing corridor.

Construction

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

There may be indirect adverse effects on surrounding heritage assets during the construction works. These effects are not considered to be significant given the relatively short term, temporary nature of the construction works. Supplementary mitigation can be implemented through the use of hoarding, to provide a physical/visual barrier to the works.

Operation

The height of the proposed development will be up to 28 storeys, and therefore a greater scale than that previously on site, which was up to 5 storeys, as well as much of the surrounding area.

The site is not within a Conservation Area or Site of Archaeological interest, and neither does it include any listed buildings. The closest listed buildings include the Locally Listed Shortcroft Mead Court approximately 50m to the east, the grade II* listed Church of St. Mary 275m to the south, and the Grade II listed Willesden Jewish Cemetery 400m to the south.

The Council considers that the proposed development is likely to lead to adverse effects on built heritage, however given the scale of the development and the urban nature of its location, significant effects are not considered likely.

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

Mitigation

During construction, ensure the erection and maintenance of hoarding.

Climatic Factors

Documentation Accompanying the Planning Application: it is noted by the applicant that the following will be provided alongside a planning application: Wind Microclimate Assessment, Sustainability Statement, Whole Life-Cycle Carbon Assessment, Energy Statement including Overheating Assessment, and a Circular Economy Statement.

Construction

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

Operation

It is noted within the accompanying EIA screening report that sustainable building methods will be utilised to minimise development energy consumption, and that this will be set out within the above listed documents. The applicant, to achieve planning permission, will be expected to comply with the Development Plan requirements on energy reduction and sustainability.

It is therefore considered that the proposed development will be able to achieve the necessary carbon reduction targets, through actual reductions, and combined with financial contributions secured through planning obligations as a last resort. The effects of which are beneficial, but are not considered to be significant. Supporting information notes that sustainable design and construction will be a key aspect of the proposals, ensuring compliance with regional and local planning policies.

Mitigation

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

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

Contaminated Land

Documentation Accompanying the Planning Application: The applicant has prepared a phase 1 Geoenvironmental assessment.

The sites use as existing and historical is for education. The phase 1 geoenvironmental assessment has identified that the site is unlikely to be significantly contaminated in line with its existing and historic use. Therefore significant adverse impacts as a result of historic and proposed land uses are not considered to be likely.

Construction

Additional standard mitigation measures will also be required during the construction of the proposed development, to ensure that the works are undertaken in an appropriate manner. These should be secured through conditions in agreement with the Council's Contaminated Land Officer.

With the implementation of these mitigation measures, no significant effects are considered likely.

Operation

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

Mitigation

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

Daylight, Sunlight and Overshadowing
There are a number of sensitive receptors in close proximity to the proposed development site, including residential properties on all sides. The most sensitive receptors are in the west adjacent to Selbie Avenue, the east along Dudden Hill Lane, and the south along Denzil Road.

Documentation Accompanying the Planning Application: A Daylight, Sunlight and Overshadowing Assessment is noted as being submitted as part of the planning application process.

No discipline specific documentation has been provided to accompany the EIA screening assessment report.

Construction

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

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

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

Operation

The operation of the proposed development will introduce buildings up to 28 storeys in height onto the site. Due to the proximity of nearby sensitive receptors and the height there is the potential for the proposed development to affect surrounding receptors. The associated daylight and sunlight assessment will provide evidence as to how the application has considered and been designed with this in mind. To receive planning permission this must show that impacts have been minimised, being within acceptable industry standard and policy compliance limits. Given the size of the site, its location within both a Growth Area and Tall Building Zone, and its potential for transformative change as guided by the NSGA SPD, it is considered that these limits can be achieved.

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

With respect to the proposed onsite receptors the building will sit within a context where tall buildings are prevalent in close proximity which could impact on sunlight and daylight available to the development. Whilst this might impact on some receptors, significant effects are not considered to be likely, and will be given further consideration as part of the required daylight, sunlight and overshadowing assessment.

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

Mitigation

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

Biodiversity (including flora and fauna)

Documentation Accompanying the Planning Application: A preliminary Ecological Appraisal and External Bat Scoping Survey has accompanied the EIA screening assessment. it is also noted that a Biodiversity assessment, including a net gain strategy, will accompany any forthcoming application.

The site includes limited green infrastructure, including incidental green verges with shrubbery and trees, particularly adjacent to Denzil Road in the south, the LUL in the north, around the car park in the west, and adjacent to Dudden Hill Lane in the east. None of the trees are protected by a Tree Protection Order (TPO). The site itself includes no open space or nature conservation designations. The closest designations include the Railway tracks and sidings to the north which is a designated Wildlife Corridor, and two small open spaces including Denzil Road pocket park to the west along Selbie Avenue, and Willesden Community Garden to the east occupying the corner of Denzil Road and Dudden Hill Lane.

The accompanying documentation notes the site's existing habitat has the potential to support badgers, roosting and foraging bats, nesting birds, reptiles and hedgehogs. It notes a number of mitigation and enhancement measures which if undertaken, will ensure the proposed development does not result in significant impacts. These include species specific measures, and general enhancements such as native planting, inclusion of bat/bird boxes, log piles, and the achievement of biodiversity net gain.

Construction

The Preliminary Ecological Appraisal undertaken in 2022 indicates that the site comprises: Buildings and hardstanding, Scattered trees, Amenity Grassland, Bare ground, Dense scrub, Introduced shrub, Scattered scrub, Earth bank, Ephemeral and Intact species-poor hedgerow. Green infrastructure adjacent to the site, particularly to the north, and on-site vegetation adjacent to these sites, is considered to be of the greatest importance to biodiversity, and should be the focus of mitigation measures, including reducing impacts of lighting. The primary area of the proposed development generally excludes these areas, although may have short term impacts upon them which should be mitigated. The main area of the site is therefore considered to have negligible intrinsic ecological value, being primarily occupied by hardstanding and buildings with little contiguous vegetation of high quality. As such, no significant effects are considered to be likely.

Operation

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

Mitigation

There are no designated sites (SSSI or LNR) within sufficient range of the site to be affected by the construction or operation of the site, although the railway sidings to the north are designated as a SINC.

Again, the report states that: ‘The recommendations within Section 7 of this report should be adhered, to reduce the impact on protected species. Provided the recommendations within Section 7 of this report are undertaken and mitigation measures adhered to, then potential negative impacts on protected species, if present, will be negligible.’ Based on the information assessed, there is not likely to be any significant effect or cumulative effect of a development at the Site on ecology. Therefore, this should not be a matter for an Environmental Impact Assessment (EIA) but instead a consideration within the normal planning application process.

Flood Risk

Documentation Accompanying the Planning Application: No Flood Risk Assessment (FRA) has been submitted with the planning application. The site is located within Fluvial Flood Zone 1, and is therefore considered to be at low risk to flooding from this source. The site does however include small areas within zone 3a for surface water floor risk. In accordance with the West London SFRA guidance a FRA will be required for the site to address this matter. A Sustainable Drainage Strategy will also accompany any forthcoming planning application.

Construction

Given the scale of the development and the nature of flood risk associated with surface water flooding, the construction of the proposed development is not considered to significantly affect flood risk.

Operation

The proposed development site is located in an area at low risk of flooding fluvial flooding, and a high risk of surface water flooding; however the proposed development does have the potential to affect the onsite infiltration rates through changes to the amount of hardstanding. Providing the application accords with Development Plan policy, and achieves greenfield run-off rates, the operation of the proposed development is not considered to significantly affect flood risk.

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

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

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

Mitigation

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

Human Health

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

Land (land take)

The construction and operation of the proposed development will utilise brownfield land to provide a student accommodation/office use. This is not considered to generate any significant effects. No discipline specific mitigation has been relied upon for the EIA Screening Opinion.

Material Assets

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

Major accidents and/or disasters

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

Noise and Vibration

Documentation Accompanying the Planning Application: A noise vibration impact assessment has been submitted with the applicants EIA screening assessment.

<u>Construction</u>

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

The previously submitted noise assessment did not identify any issues which could not be properly mitigated through conventional construction means.

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

Due to the size of the development, the number of construction vehicles required is considered to be relatively small. No significant effects are therefore anticipated.

<u>Operation</u>

The proposal does include up to 5,000sq.m. of flexible commercial uses. It is currently unclear what these uses will be specifically. The accompanying noise assessment notes a number of required mitigation measures which can be incorporated into the design of the development to ensure it is within general compliance limits, and does not impact upon the

existing or proposed residential receptors. These are included within the accompanying reports recommendations, and including high levels of acoustic insulation; imposing noise limits on tenants; and restricting their hours of operation.

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

There is the potential for new residents to be affected by adverse noise due to the site's location being adjacent to two main roads and the LUL to the north. This confirms that new residents can be protected through the appropriate design of the proposed development. The proposed development can therefore be designed with consideration to the location of the development and the potential noise implications – secured through planning conditions.

No significant effects are therefore anticipated.

Mitigation

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

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

Socio-Economic (including population)

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

Construction

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

Operation

The proposed development would create benefits to local employment though providing permanent employment once operational. This is considered beneficial but not significant.

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

Mitigation

Financial contributions will be sought to mitigate the effects of increased population/users.

Soil (organic matter, erosion, compaction, sealing)

Construction

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

Operation

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

Mitigation

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

Telecommunications

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

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

Townscape and Visual Impact

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

Documentation Accompanying the Opinion Request: A Heritage, Townscape and Visual Impact Assessment is identified as accompanying any forthcoming planning application and should identify the extent to which the development impacts on skyline and protected views. The National Stadium is subject to local policy for protection of views to it from various locations across the borough.

The site is within a Tall Building Zone as identified within the Local Plan, and comprises part of the Neasden Stations Growth Area. This is supported by the associated masterplan SPD which identifies buildings up to 22 storeys may be appropriate in the College Green character area. It is accepted that the proposed SPD considered townscape and visual impacts more generally as a site wide scheme, and that alternative approaches to scale and massing may be appropriate if sufficiently justified by supporting evidence.

Construction

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

Operation

The height of the proposed development will be up to 28 storeys and therefore a greater scale than that previously on site (up to 5 storeys), as well as much of the surrounding area. However, the site does sit within the Growth Area which is going to be subject to transformative change including buildings of a significantly greater scale.

The accompanying screening report states that 'The massing strategy for the proposed development responds to local vernacular at the site and rises to high points to the north of the site where the site borders the railway line, therefore reducing the likelihood of adverse townscape and visual effects, with lower massing forms along Selbie Avenue and Denzil Road so as not to be overbearing on neighbours and existing street scene. The approach aligns with the massing principals of the NSGA. The development will join other existing or granted developments, as well as those which are planned for by the Council in contributing to the emergent skyline and townscape of the local area. Therefore providing the application is in general conformity with the NSGA SPD, and that scale and massing is justified accordingly, it its considered unlikely that the proposed development will result in significant impacts.

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

Mitigation

During construction, ensure the erection and maintenance of hoarding.

Traffic and Transport

Documentation Accompanying the Planning Application: The application will be accompanied by a Transport Assessment, Framework Travel Plan, Construction and Logistics Plan and outline Delivery and Servicing Plan. Transport documents should be based around the London Plan Healthy Streets approach.

The site is well connected by public transport, achieving a Public Transport Accessibility Level (PTAL) of 3-4. This reflects the sites close proximity to Dollis Hill and Neasden LUL stations, providing access to the Jubilee line which runs north-west to Wembley and Stanmore, and south-east to central London. The site is also within close proximity to a number of bus routes along Dudden Hill Lane.

Construction

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

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

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

Operation

A Deliver and Servicing Plan and Refuse Management Plan will be submitted with the future planning application and set out how the site would be serviced when operational. This will

need to focus on how the commercial and residential uses do not conflict, and how operations have been consolidated as far as is practicable.

The report concludes that the operational traffic effects of the proposals will be negligible – especially when placed within the context of the site's previous use. The proposed parking of 50 spaces for 1,550 units, represents 3% parking provision, and will be dedicated for disabled blue badge holders. It is therefore effectively car-free. Given the small amount of car parking included in the design of the proposed development, this is considered a reasonable conclusion, and as such significant effects are not considered to be likely.

There will also be some vehicle movements associated with servicing, pick up and drop off, disability parking and other proposed employment uses on site. However, given the current use on the site, overall vehicle movements are unlikely to result in any significant effects. As such, operational traffic effects of the proposals are likely to be negligible when placed within the context of the site's existing use. Increased numbers of movements related to deliveries could generate additional traffic over current levels. However, given the scale of the development, these effects are not considered to be significant.

The lack of on-site car parking will mean that suitable controls on residents' potential to own/ park cars on site and in the vicinity will be expected, this is likely to include restrictions within property leases as well as financial payments towards a local parking permit scheme, which will help to mitigate any adverse effects. Advice will be required from TfL on the impact on bus and underground network capacity.

Mitigation

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

Financial payments should be sought to offset operational effects.

Waste

Documentation Accompanying the Screening Request: A Refuse disposal and recycling strategy will be submitted as part of the planning application. This should provide an analysis of how the development will adequately cater for the storage and collection of domestic and commercial waste during its operation will be sought. A DCEMP will be sought as part of the planning process to deal with demolition and construction waste matters.

No waste assessment has been submitted with the request, but the screening opinion supporting statement does provide information regarding construction and operational waste.

Construction

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

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

Operation

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

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

Mitigation

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

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

Water Quality (hydromorphological changes, quantity and quality)

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

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

Construction

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

Operation

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

Mitigation

A CEMP should be secured that includes measures to protect against and deal with accidental pollution events. The implementation and management of SuDS should be secured though a planning condition. This is normal practice for a major application.

Wind

Documentation Accompanying the Planning Application: A Wind Microclimate Assessment will be submitted at planning application stage (required for buildings 30m or more in height).

Construction

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

Operation

The operation of the proposed development will introduce new buildings onto the site that will be up to 28 storeys in height. Therefore there may be adverse effects on the existing wind conditions. This can be assessed throughout the normal planning process. Mitigation measures can be incorporated into the development to reduce the impacts on those within and adjacent to the development to acceptable levels.

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

Cumulative Effects

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

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

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

Documentation Accompanying the Planning Application: The cumulative impact assessments submitted with the screening opinion application identified a number of major and minor developments within the vicinity and placed weight on the consideration/ acceptability of impacts of the proposed development. There are no recent EIA screening opinions for developments within the considered vicinity, with which to compare the results with this EIA screening report. The Council can however consider the results of its Integrated Impact Assessment for the Local Plan 2019-2041, particularly those where the Neasden Stations Growth Area has been discussed and considered.

The Council has considered a similar area, given the proposed scale of this development proposal, and that proposed in the wider Neasden Stations and nearby Church End Growth Areas.

Demolition/Construction

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

It is also assumed that the enabling works, demolition and construction phases associated with the other development schemes would adhere to legislative requirements, industry guidance and best practice as will be the case within the application sites. However, there remains the potential for cumulative effects to arise, particularly with respect to dust and noise. It is noted that the scheme will take place in two phases, with the first phase being circa 1050 units coming forward under a hybrid outline/detailed application, and the latter detailed phase for circa. 500 units is being delivered once this phase is near completion. It is assumed that each phase, being for a significant number of dwellings, will be phased and not under construction all at once. This will go some way toward curbing the potential for significant cumulative impacts.

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

Operation

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

It is anticipated that CIL and S106 will address capacity issues that might exist in relation to on and off-site infrastructure. However, in in relation to healthcare provision, the Northfields EIA identifies moderate adverse cumulative effect is anticipated in relation to the demand on primary healthcare facilities. Taking into account the high numbers of residential units proposed arising from the Proposed Development and the committed developments, current provision will potentially be inadequate to meet additional demand. The committed developments may then, if not proposing on or off-site healthcare provision, have to mitigate any shortfall through S106 agreements and CIL contributions.