10th June 2016
Delivered by email and post

Gary Murphy
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Dear Mr Murphy

REQUEST FOR SCREENING OPINION PURSUANT TO REGULATION 5 OF THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2011 (AS AMENDED)

PEEL SITE, LONDON BOROUGH OF BRENT

Introduction

We are writing on behalf of our client, the London Borough of Brent (‘the applicant’) to request an Environmental Impact Assessment (EIA) Screening Opinion pursuant to Regulation 5 of the Town and Country Planning (EIA) Regulations 2011, as amended in 2015 (‘the Regulations’) for the proposed redevelopment of the Peel Site in the London Borough of Brent (‘the Proposed Development’), as detailed below.

Please find enclosed a site and location plan (Map 1 and Map 2) for the Proposed Development as required under regulation 5(2), which also requires a brief description of the nature and purpose of the development and of its potential significant effects on the environment, which is set out below.

The Proposed Development will be submitted as a hybrid planning application, and as such a plan illustrating the Full and Outline parts of the Proposed Development is attached (Map 3), along with a phasing diagram for the delivery of the Proposed Development (Map 4) which is attached for information, while an overview plan of the London Borough of Brent’s South Kilburn Masterplan and Regeneration Programme (“The Masterplan”) is also attached (map 5) as further contextual information.

The Proposed Development is allocated as part of phase 3a of the London Borough of Brent’s South Kilburn Masterplan and Regeneration Programme (“The Masterplan”), which is driven by an adopted Supplementary Planning Document. There is no outline planning application for the Masterplan as a
whole, and as such the individual phases are coming forward in the context of the SPD and as standalone planning applications, and not reserved matters applications. There is as a result no existing Environmental Statement covering the Masterplan proposals as a whole. Further information about the Masterplan is set out below.

The Site and Surroundings
The Peel Site (“the site”) covers an area of approximately 1.44 hectares in the south east of the London Borough of Brent, close to the borough boundary with Westminster which is located to the south. The site is located between Carlton Vale to the south (the B413) and railway tracks to the north, in the heart of the Masterplan area which extends to the east and west beyond the site as illustrated in the appended plans. The site has a PTAL rating of 5 and is located between the Queens Park London Underground Station (Bakerloo Line) to the West, and Kilburn Park London Underground Station (Bakerloo Line) to the east.

The site more specifically is bounded by the recently refurbished Carlton House to the north which backs onto Denmark Road, by Neville Road and Neville Close to the west, and by the junction of Canterbury Road and Princess Road to the east, in addition to the junction with Granville Road as shown on the appended maps.

The site takes in five distinct buildings (of between 1 and 4 storeys) and the space between them, housing a number of residential and commercial buildings, comprising 56 residential units housing a mix of local authority tenants and owner occupiers/leaseholders, 16 ground floor commercial units (including one vacant unit), a Royal British Legion building, and the South Kilburn Studios. Part of the site, incorporating the existing commercial units is pedestrianised. The buildings are predominantly Ground plus 2/3 upper storeys, while the South Kilburn Studios is a single storey pavilion type building.

The buildings comprise post-war development, with the Peel Site being comprehensively redeveloped in the mid to late 20th Century. The South Kilburn Conservation Area is located to the east of the site, between which sits a number of recently redeveloped buildings of greater scale. The site does not include any heritage assets.

The wider Masterplan area includes a number of slab block type residential buildings, which rise up to between 10 and 18 storeys at various points across the site. Between these slab blocks are areas of formal and informal open space, and residential buildings of smaller scale of around 4-5 storeys, alongside some community uses and civic buildings.

The South Kilburn Masterplan
The site is allocated as a phase of The Masterplan, which is driven by a Supplementary Planning Document setting out development principles, seeking to ensure the long term physical, social and environmental regeneration of South Kilburn. The aim of the Masterplan is to regenerate the existing South Kilburn housing estate, which suffers from numerous inherent design problems, including poor quality homes, poorly designed spaces between buildings, and disparate and poorly defined open and public spaces.

The inherent design problems have combined with ageing facilities and the increased costs of management and maintenance to result in poor quality living accommodation. The poor design has contributed to anti-social behaviour, gang culture and severance from adjoining neighbourhoods.

The Masterplan aims to change South Kilburn into a sustainable and mixed community, through a series of phased and sequential developments, which are set out in the accompanying Map 5. The Masterplan aims to deliver 2400 new high quality homes, around half of which will be made available to existing South
Kilburn secure tenants, while the balance will be high quality homes for private sale, to maintain the viability of the regeneration programme in the long term.

The Masterplan also aims to deliver a new larger high quality urban park, a new local primary school, new health facilities (provided through this Proposed Development), improved public realm, a site wide energy solution, and improved environmental standards.

To date, as illustrated in the accompanying Map 5, phase 1 of the Masterplan has been delivered, providing a total 570 new homes to South Kilburn, 71% of which were either social rented or shared ownership housing. Phase 2 delivers 746 high quality new homes in South Kilburn, many of which are currently under construction, with the remainder of proposed residential buildings in this phase having planning permission.

Phases 1 and 2 deliver a number of buildings that vary in scale depending on their position in the Masterplan area, with a number of taller buildings adjacent to the railway tracks up to 10 storeys in height, while being generally lower in height on plots set further within the site. The proportion of private homes in phase 2 is significantly higher than in phase 1 to enable the delivery of future phases of the Masterplan.

Phase 3a of the Masterplan incorporates the Peel Site (the site) in addition to further development sites on other parts of the Masterplan area, which are yet to come forward for planning, while a further Phase 4 (which is split into two sub phases) forms the final phase of the Masterplan, envisaged to come forward for planning between 2019 and 2023.

**Description of development**

The Proposed Development is for the phased demolition and redevelopment of all existing buildings on site (as set out on Map 4), to provide new affordable and private residential accommodation alongside a new health centre (class D1), A-class retail uses, D2 class leisure, and a new public linear square.

The Proposed Development is being submitted in the form of a hybrid planning application as follows:

- Full planning application for 38 Affordable Housing units, 64 Private housing units, D1 class floorspace, D2 class floor space, 3 A-class units, associated landscaping, highways and public realm improvements, private open space, car parking, cycle parking and servicing provision.
- Outline planning application for 4 Affordable Housing units, and up to 120 private units, with associated landscaping, private open space, and cycle parking.

The outline element of the hybrid application will be submitted with a reasonable level of detail in which to assess the likely environmental effects, including block plans setting out height and massing envelopes, while demonstrating how the required number and mix of residential units will be achieved, alongside an indicative material and landscaping strategy. This has allowed the technical studies below to progress including the modelling of the outline element of the application.

The phasing of the Proposed Development is illustrated in Map 4 as attached, which has been developed to rehouse existing secure tenants within the site as a priority, to be followed by the development of the new health centre, retail units, and private residential accommodation.

The Proposed Development seeks to meet the aims and objectives of the Masterplan as set out in the previous section, while also seeking to re-instate a version of the urban street pattern that once was, to re-connect roads that were disconnected through redevelopment in the mid to late 20th Century, focussing primarily on Canterbury Road. At the same time, traffic calming and landscaping measures will maintain the pedestrian right of way as a priority, focused on the pedestrianised linear square connecting...
Canterbury Road to Carlton Vale, which will be landscaped and future proofed for the potential provision of a street market.

In terms of scale, the Proposed Development includes buildings that are in fitting with the surrounding built environment and which have been developed in line with daylight and sunlight advice, comprising 7 buildings in total (buildings A to G), predominantly 4-7 storeys in height, rising to a Ground plus 15 storey taller residential building fronting Carlton Vale. The surrounding built environment in the immediate vicinity comprises new buildings of between 7 and 8 storeys, while the neighbouring 1960s Craik Court development stands at 12 storeys, fronting Carlton Vale, and nearby Hereford House stands at Ground+17 storeys, also fronting Carlton Vale.

The creation of a new public space sits at the heart of the Proposed Development with the main entrance to the proposed health centre placed at the centre of the public space, with proposed pharmacy, café and retail facilities on either side, creating an active community space. The public space is linear in form, connecting Canterbury Road to Carlton Vale, and provides a significant space for community activities.

**Potential significant effects on the environment**

Given the nature of the Proposed Development and existing site characteristics as set out above, potential effects on the environmental could relate to a number of matters which are explored in depth later in this letter; however none of these potential effects are considered to be significant given the baseline conditions and nature of the Proposed Development.

The hybrid planning application for the Proposed Development will be informed by a number of supporting documents and studies that consider the nature of the Proposed Development and its likely effects on the environment, along with any necessary measures to mitigate these effects.

The submission requirements have been agreed with London Borough of Brent officers for both the full and outline components of the hybrid planning application, and will include the following technical assessments and reports, which are based on the detailed specifications within the full element of the application, and the agreed principles and parameters of the outline element of the application:

- Existing plans and layouts
- Demolition plans
- Proposed drawings, plans, layouts and elevations (level of detail as agreed with London Borough of Brent for the full and outline elements of the application in Penoyre & Prasad File Note dated 13 April 2016)
- Design and Access Statement, including views, townscape/heritage impact analysis.
- Daylight & Sunlight Assessment (for the proposed residential units and neighbouring properties)
- Wind & Microclimate Assessment
- Sustainability Assessment
- Energy Assessment
- BREEAM Pre-Assessment
- Ventilation & Extraction Strategy
- Flood Risk Assessment
- Foul Sewage and Utilities Assessment
- Noise Assessment
- Air Quality Assessment
- Waste Strategy
- Parking and Transport Assessment
- Landscaping Strategy
The Regulations define “EIA development” as meaning “development which is either—
(a) Schedule 1 development; or
(b) Schedule 2 development likely to have significant effects on the environment by virtue of factors such as its nature, size or location;”

The Proposed Development is not Schedule 1 development. “Schedule 2 development” is defined in the Regulations as meaning “development, other than exempt development, 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.”

The site is not within a sensitive area as defined in the Regulations. Schedule 2, item 10 does, however, list types of infrastructure projects including “(b) urban development projects”. The Proposed Development applies to this part of the regulations by virtue of including more than 150 dwellings, which meets the threshold criteria for part (b) II of this regulation.

Regulation 4(6) of the Regulations requires the selection criteria set out in Schedule 3 be taken into account when determining whether Schedule 2 development is EIA development. The criteria in Schedule 3 are concerned with:

1. The characteristics of the development (having regard in particular to size, cumulative effects with other development, use of natural resources, production of waste, pollution and nuisances, and risk of accident);
2. The environmental sensitivity of the geographical areas likely to be affected by the development (with regard to existing land use, natural resources in the area, absorption capacity of the natural environment, with regard to particular types of area); and
3. The characteristics of the potential impact in the context of the above two points (having regard in particular to the extent, transfrontier nature, magnitude and complexity, probability and duration, frequency and reversibility of the impact).

Planning Practice Guidance indicates the types of case in which, an EIA is more likely to be required. It states:

‘Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination.’

EIA is more likely to be required where:

‘(i) the area of the scheme is more than 5 ha; or
(ii) it would provide a total of more than 10,000m² of new commercial floorspace; or
(iii) the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).’
‘Account is also to be taken of the physical scale of such developments, potential increase in traffic, emissions and noise.’ (Reference: National Planning Practice Guidance, Environmental Impact Assessments, Annex: Indicative Screening Threshold Paragraph 58).

Consideration of significant environmental effects
The description above of the Proposed Development and existing site lead to consideration of significant environmental effects on the following points from Schedule 3:

1 Characteristics of development

Size, townscape and visual
The baseline conditions of the site, and much of the surrounding area comprises a densely developed Central London urban environment, that has been a long standing, densely built residential area dating back several hundred years. The site and the wider Masterplan were significantly re-developed between 1960 and 1975 following bomb damage in World War II. As set out above, the site and surrounding area currently contain buildings of 3-4 storeys, while neighbouring buildings include the new build ground plus 7 storey Merle Court to the east on Carlton Vale, the ground plus 11 late 20th Century Craik Court to the west, and Ground plus 17 storey Hereford House also to the east on Carlton Vale. As set out above, the earlier phases (1 and 2) of the Masterplan include a number of taller buildings up to 10 storeys in height.

The Proposed Development will result in visual change through the demolition and redevelopment of all existing buildings and public realm on site, including the introduction of a taller building, which responds to the surrounding built environment. This follows other recent redevelopments on neighbouring sites where height and mass has been added, including Merle Court, the buildings on the junction of Princess Road and Canterbury Road, and the earlier phases of the Masterplan as set out above.

The massing of the proposed buildings responds to the neighbouring built environment while optimising the brownfield site, placing the tallest parts of the Proposed Development near Carlton Vale adjacent to neighbouring taller buildings including Merle Court and Craik court, at the furthest point on the site from the nearby Conservation Area, and gradually stepping down towards the North-East and the 4-storey Carlton House, where low rise terrace-like residential buildings will be located. The buildings will be of high quality, sustainable design, accompanied by public realm improvements, the provision of private and public open space, landscaping and planting, in addition to cycle and car parking.

The full planning application component includes the residential tower Building A (Ground plus 15 storeys) which also incorporates ground floor retail and first floor flexible retail/leisure/health care floor space, the health centre Building B (Ground plus 4 storeys), the residential Building C (Ground plus 6 storeys) which incorporates retail at ground floor and flexible retail/leisure/health care at first floor level with residential above, and residential building E (Ground plus part 3/4/5 storeys). The outline planning application component includes residential building D (Ground plus part 5/7 storeys), residential building F (Ground plus part 4/5 storeys) and residential building G (Ground plus part 3/4 storeys).

The Design and Access Statement that will form part of the planning application will set out the design principles and include an analysis of height and massing throughout the South Kilburn area. It will also include an analysis of identified local views as agreed with the local planning authority, including from within the neighbouring South Kilburn Conservation Area, illustrating the effect of the Proposed Development on townscape and these local views.

The taller element will be primarily visible from the south, namely from Carlton Vale and the open space to the south, where it will sit alongside the taller buildings mentioned above. The top of the taller building is
visible from one of the two identified views within the Conservation Area (from Princess Road), the setting of which has been more directly affected by the recent developments that abut the Conservation Area on the junctions of Canterbury Road, Princess Road, and Granville Road. The South Kilburn Conservation Area appraisal states that the area is surrounded by modern developments, and that the views out of the Conservation Area are mostly onto higher rise modern developments. Townscape improvements will result from the redevelopment of existing poor quality buildings, with high quality replacements. The significance of the heritage assets, primarily the setting of the neighbouring Conservation Area and listed buildings within it will not be significantly affected by the Proposed Development, thereby maintaining their character and special interest in line with the NPPF.

The impact on the visual environment will be positive in terms of the redevelopment and improvement of the building stock, landscaping and public realm improvements. Townscape and visual impact will relate to the change in the scale of development, including the taller building on Carlton Vale. The effect is deemed to be less than significant given the context of the neighbouring built environment which includes taller buildings, no heritage assets within the site, and no significant effect on neighbouring heritage assets.

**Sunlight and daylight, overshadowing**

A full daylight and sunlight assessment will accompany the planning application, setting out the baseline daylight and sunlight conditions for neighbouring relevant occupiers, which is influenced by the existing nature of the built environment as set out above. Pre-application daylight and sunlight analysis has also been undertaken to inform design development of the Full and Outline elements of the Proposed Development.

The layout, design and massing of the proposed buildings responds to the neighbouring built environment while optimising the site, placing the tallest parts of the development near Carlton Vale adjacent to neighbouring taller buildings including Merle Court and Craik Court, and gradually stepping down towards the North-East and the 4-storey Carlton House, where low rise terrace-like residential buildings will be located. In addition, the layout and spacing between buildings has been developed in consideration of daylight and sunlight, overshadowing and overlooking analysis, with a 19m road width maintained along Canterbury Road and the linear public square. This will be set out in the design and access statement.

The pre-application daylight and sunlight assessment concludes that 79% of the identified surrounding receptors tested meet the BRE guidelines, which is considered to be positive given the site’s dense urban location. Of those properties where there are effects beyond the BRE guidelines, the effect is negligible or minor in magnitude. The report also shows that 94% of receptors fully meet the BRE guidelines’ criteria in terms of sunlight analysis.

Taking account of the characteristics of the site and Proposed Development, including the layout, scale and massing of buildings across the site in relation to neighbouring properties, which will be discussed in the Design and access statement that will form part of the planning application, it is considered that the Proposed Development will not cause significant environmental effects in relation to daylight and sunlight, overlooking and overshadowing.

**Transportation**

The baseline conditions for the site are high transport accessibility (PTAL level 5) through the neighbouring Queen’s Park and Kilburn Park London Underground Stations which are located around 500m from the site, in addition to several bus routes directly serving the site along Carlton Vale. The site also includes the pedestrianised main commercial street, which will remain partly pedestrianised in the Proposed Development, connecting Carlton Vale to the re-connected Canterbury Road. The existing site
also includes a number of car parking spaces, with a residents’ parking permit system in place. A Parking Assessment and full Transport Assessment will be submitted with the planning application.

The construction period will lead to an increase in construction traffic, which is to be mitigated and managed through a site construction traffic plan to be agreed with the London Borough of Brent in addition to the Construction and Environmental Management Plan which will be secured as part of the planning process, and the use of the considerate constructor’s scheme. Construction vehicle movement will be limited to safe, secure construction routes as agreed with the borough. The effect of this will therefore be minor, temporary and short term in nature.

The main effects of the operational phase involves the promotion of sustainable transport through the provision of cycle parking for the residential development, health centre and retail uses in line with London Plan standards. At the same time, the increase in residential population may lead to increased use of the public transport network, which will be assessed in the Transport Assessment accompanying the application.

The private residential units are ‘car free’ with the exception of the provision of 10% wheelchair spaces in line with LBB and London Plan standards. Secure tenants will be able to apply for CPZ or private parking permits, while a number of spaces will also be made available to Brent Housing Partnership for them to allocate to their residents, taking into account that 65-96 Carlton House is adjacent to the Peel Site.

Pre-application analysis indicates that the Proposed Development will lead to an increase in demand for car parking spaces, which is mitigated through an increased provision within the site alongside the use of current car parking capacity in the vicinity of the site, which will be discussed in detail in the Parking Assessment and Transport Assessment to be submitted with the planning application. Pre-application on street parking capacity analysis illustrates residual capacity in over 20% of ‘wings’ spaces (a car parking permit scheme that provides off street parking permits to residents of Brent Housing Partnership housing estates at a reduced price compared to parking permits within LBB controlled parking zones), and nearly 60% of on street resident’s parking spaces in the vicinity are available. It is predicted in the pre-application traffic assessment that the Proposed Development will increase daily traffic flows on the local road network by what is deemed to be a negligible amount.

Taking account of the site’s setting in terms of public transport accessibility, and nature of the Proposed Development where cycling and walking is promoted, in addition to an on site increase in car parking spaces reflecting UDP parking policy, it is considered that no significant environmental effects in terms of transport will result from the Proposed Development.

**Air Quality**

The site falls within the London Borough of Brent’s Air Quality Management Area (AQMA) which is a borough-wide designation due to measured and modelled exceedances of the air quality objectives for nitrogen dioxide (NO2) and particulate matter (as PM10). The primary source of emissions of these pollutants in the Borough is road traffic. A full Air Quality Assessment will accompany the planning application. Pre-application analysis has been undertaken which has surveyed the existing baseline air quality around the site, and assesses the effect of construction and operation of the full and outline elements of the Proposed Development on air quality.

The Proposed Development has potential to introduce suspended and re-suspended fugitive dust emissions from demolition / construction activities; and emissions from construction traffic, including re-suspended dust from HGV movements. An assessment of the potential risk of dust impacts will form part of the Air Quality Assessment and will include recommendations for mitigation where appropriate, including measures such as continuous monitoring of dust levels during demolition and construction
periods, the erection of barriers, the adoption of dust suppression techniques including water suppression, management of construction vehicles to minimise emissions (switching off engines when stationary and other measures), which can be secured by a Construction and Environmental Management Plan.

The operational traffic associated with the site is unlikely to affect local air quality. However, dispersion modelling has been undertaken to assess the suitability of the site for residential developments with regards to the potential exposure of future occupants to elevated pollution concentrations. It is likely that mechanical ventilation will be required at sensitive locations where there is the potential for adverse effects, primarily at lower levels facing Carlton Vale and this will be incorporated into the design of the Proposed Development.

An energy centre is proposed for the site which would comprise a natural-gas fired combined heat and power (CHP) plant and supplementary gas-fired boilers, venting to air at roof level. The proposed boiler and CHP units will be compliant with the Mayor of London's Emissions Standards. An assessment has been undertaken to determine whether the building-related emissions will be air quality neutral, in accordance with the London Plan.

The site impacts are limited to the demolition and construction phases and will therefore be short term and temporary in nature, and energy centre emissions only. Construction management measures will ensure that the impact of dust and particulate releases will be effectively mitigated, with resulting impacts being negligible.

The CHP and boiler units proposed for the site will comply with the emissions limits specified by the GLA, and the anticipated energy centre emissions have been assessed as air quality neutral. It is therefore considered that there will be no significant environmental effects in terms of air quality taking into account the proposed use of the site, the energy strategy and ventilation and extraction strategy that will form part of the application, and construction management proposals including mitigation measures.

**Noise**

An environmental noise assessment will accompany the planning application, and pre-application analysis has been undertaken which demonstrates that the dominant sources of noise for the site as existing are road traffic on Carlton Vale to the south, and noise from the railway lines to the north.

The assessment will focus on noise from plant, as the main potential source of noise from the Proposed Development, and analysis to date demonstrates that the plant will operate at noise levels in line with London Borough of Brent UDP policy (2004) and British Standards 4142 and 8233, and that the site is suitable for the proposed uses given the baseline noise conditions.

The Proposed Development will lead to temporary and short term noise impacts resulting from the demolition and construction phases, which will be mitigated through measures to be set out and secured in the Construction and Environmental Management Plan.

The Proposed Development is therefore considered to not cause any significant environmental effects in terms of noise, given the proposed use of the site and design, including mitigation measures where appropriate.

**Energy & Sustainability**

The use of natural resources for the Proposed Development has been assessed as part of the evolution of an energy strategy and sustainability strategy, full versions of which will accompany the planning application. The Proposed Development seeks to redevelop the site, providing a series of high quality sustainable buildings.
The proposed development will result in increased energy demands through an increase in residential units across the site, provision of the health centre and other uses. The energy and sustainability strategy will set out how the environmental performance of the Proposed Development will meet policy requirements, creating a sustainable development that mitigates the proposed increase in population through measures such as those detailed below. This is based on the detailed developed design of the full element of the planning application, and the information to be submitted as part of the outline application which includes block plans demonstrating massing, residential unit numbers and mix, a material and landscaping strategy and other details.

The applicant’s energy strategy will seek to reduce energy demand, through the use of enhanced building fabric, air tightness and insulation, high efficiency lighting and fittings, heat recovery ventilation and comfort cooling. The strategy will cover ‘clean’ energy generation through the use of a CHP system to provide heating and power across the site, until connection with the future district heat network is established. The Proposed Development will also generate renewable energy through the use of PV cells and air source heat pumps. In total the Proposed Development reduces regulated CO2 emissions by more than 35%, in line with London Plan and Building Regulations targets.

In terms of sustainability, the Proposed Development will seek to achieve BREEAM ‘Excellent’ levels through a range of measures and credits as set out in a Sustainability Assessment that will accompany the application, including sustainable approaches to water usage, materials and waste, ecology, energy and transport.

As such while the Proposed Development will increase energy demand through an increase in the residential population on the site, the environmental effects of this will not be significant, and will be mitigated by the energy and sustainability strategy adopted. These strategies will seek to minimise demand, generate energy efficiently including through on site renewable generation, and minimise CO2 emissions throughout the Proposed Development.

Wind and Microclimate
As part of the design evolution process a pre-application wind assessment has been undertaken, assessing existing wind and microclimate conditions, and the effect of the Proposed Development. A full wind and microclimate assessment will be submitted with the planning application, which will be based on the detailed design to be submitted for the full element of the application, and block plans and other details submitted for the outline element of the application.

The pre-application assessment methodology adopted Conceptual Fluid Dynamics (CFD) modelling and compares the predicted results of carefully selected receptors on site (selection based on professional judgement) to the intended use of those areas. Analysis of the results relates the predicted wind speeds to the Lawson pedestrian comfort criteria which is currently the most widely accepted method in industry. Baseline conditions were measured for all 12 wind directions around the site which will be set out in the wind and microclimate assessment accompanying the application.

The analysis indicates that the Proposed Development is not likely to have an adverse impact on the wind conditions on site. The results show that the wind conditions on site, with the Proposed Development in place, correspond to the intended use of the majority of the external spaces tested. 30 out of 66 receptors tested correspond to improved wind conditions when compared to existing conditions and the intended use of the spaces, while 21 receptors experienced a negligible impact and the remaining 15 experienced minor or moderate adverse conditions. Consequently, the wind conditions on site with the Proposed Development in place were found to be well within acceptable limits.
Measures to mitigate identified localised wind or microclimate effects include the design of balconies and amenity spaces to include shielding or dispersal measures, and planting adjacent to neighbouring buildings to mitigate any adverse effects. It is therefore considered that the Proposed Development will not lead to significant environmental effects in terms of wind and microclimate.

**Cumulative effects**

The Masterplan involves a phased series of developments as set out at the beginning of this letter, and as illustrated in map 5 as attached to this letter. Development sites have largely been coming forward in turn, as the Masterplan as a whole involves the rehousing of a significant number of secure tenants, and as such a site has to be developed to allow secure tenants to be relocated within the Masterplan area, before their building can be redeveloped in turn. Development is therefore largely sequential within the Masterplan area, lessening the cumulative impact of the Masterplan regeneration. For the Proposed Development, this rehousing of secure tenants is covered through the full element of the planning application.

As set out earlier in this document there are a number of sites that have been completed as part of the earlier phases of the Masterplan, and a number of sites within Phase 2 have planning consent, while a small number of proposals are under construction at present. Cumulative effects are therefore likely to be temporary and intermittent, relating to disturbance caused by the phasing of construction periods. Mitigation measures relate to Construction Management processes that are in place relating to each planning permission, covering matters such as construction traffic management, the control of pollution and disturbance and other potential effects, secured by Construction and Environmental Management Plans.

The long term cumulative effect of the Masterplan is considered to be positive in terms of changes in townscape, views, increased and improved housing, environmental improvements and the provision of local facilities, including the provision of the new health centre and new school. In accordance with the Regulations each planning application systematically assesses potential environmental effects as they come forward individually.

**2 Environmental sensitivity of the area**

**Ecology**

The planning application will be accompanied by an Arboricultural Assessment which was carried out at the pre-application stage, which concludes that the site contains a small number of trees which are of low or moderate value. There is little in the way of green or open space in the existing site, which is limited to space around existing residential buildings on the eastern extent of the site.

The demolition and construction period will lead to the removal of the existing trees as agreed with London Borough of Brent officers, which are categorised as being of either moderate or low value, many of which have a short remaining life span as assessed.

The planning application will include a comprehensive landscaping strategy as part of both the full and outline elements of the application, aiming to increase biodiversity and connectivity with existing urban habitats. The strategy will include increased tree planting, landscaping including the planting of shrubs and lawns, the provision of open and private amenity space, and measures to manage water runoff and retention including Sustainable Urban Drainage Systems (SUDS).

The Proposed Development is therefore not considered to have any significant environmental effects in terms of ecology during the construction period and longer term operational phase, with the loss of existing trees mitigated through the proposed landscaping strategy.
**Archaeology and Ground Contamination**

The site is not located within a designated area of Archaeological Priority. The entire site was comprehensively redeveloped in the mid to late 20th Century when all buildings were demolished and redeveloped following World War II bomb damage.

A preliminary environmental assessment has identified diffuse contamination in made ground, and therefore suggests remediation or alleviation activities, likely to comprise the incorporation of a clean cover system. The Proposed Development includes minimal basement excavation, limited to a small part of the health centre building and no others.

The Proposed Development will not have any significant environmental effects in terms of archaeology or ground contamination, given the proposed uses, nature of the Proposed Development as a whole, and existing site conditions in conjunction with the proposed remediation measures.

**Flood risk**

The site and wider area lie within a zone at low risk of tidal and fluvial flooding (Zone 1) as illustrated on the Environment Agency’s Flood Map for Planning. In addition the risk of flooding of the site from all relevant sources (including groundwater and surface water flooding) is considered low, and will be discussed in the Flood Risk Assessment that will form part of the planning application.

The Proposed Development will incorporate SUDS, and the buildings’ fabric and structure will be designed to minimise risk of infiltration and damage via flooding. SUDS will include permeable paving into the hard landscaping, green roofs and trenches and swales.

The Proposed Development will therefore not have any significant environmental effects in terms of flood risk, taking into account the existing site conditions, proposed use of the site and mitigations measures built into the design.

**Summary**

The Proposed Development represents the redevelopment of an already long-urbanised part of Brent, which was most recently redeveloped in the mid-20th Century. The Proposed Development is coming forward as an identified phase of the South Kilburn Masterplan and Regeneration Programme.

In summary, the baseline conditions and any potential significant environmental effects have been assessed in a number of pre-application assessments, the final versions of which will be submitted with the planning application. Mitigation measures are both inherent in the design and supplemented through measures where appropriate as set out above and in the documentation that will support the planning application, and as a result no significant environmental effects result are likely to result from the Proposed Development.

We therefore request that the London Borough of Brent confirms that the Proposed Development does not represent an EIA development for the purposes of the Regulations, and that an ES is not required to accompany the forthcoming hybrid planning application for the Proposed Development.
Yours Sincerely

Laurence Brooker
Associate Director

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Enclosed:

Map 1: Site Location Plan
Map 2: Existing Site Layout Plan
Map 3: Hybrid planning application diagram
Map 4: Phasing diagram for hybrid planning application.
Map 5: South Kilburn Masterplan phasing diagram.
Map 1: Site Location Plan
Map 2: Existing Site Layout Plan
Map 3: Hybrid planning application diagram
Map 4: Phasing diagram for hybrid planning application
Map 5: South Kilburn Masterplan phasing diagram