54 Dudden Hill Lane, Willesden

EIA Screening Report

Client: R55

25 November 2016
Quality information

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Revision History

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1. Introduction

1.1 Request for a Screening Opinion

This Environmental Impact Assessment (EIA) Screening Report has been prepared on behalf of R55 ('the Applicant') and relates to a redevelopment proposal for 54 Dudden Hill Lane in Willesden ('the Site'). The Site is located within the London Borough of Brent (LBB).

This report accompanies a request to LBB for an EIA Screening Opinion in order to ascertain if an EIA is required, under the provisions of Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended by the 2015 Regulations) (hereafter referred to as the 'EIA Regulations'). A Screening Opinion from the LBB is sought and this is to be provided within 3 weeks as stipulated within the EIA Regulations.

1.2 Structure of This Report

This report presents the information identified in Regulation 5(2) in order for LBB to provide their formal EIA Screening Opinion, namely:

- A plan sufficient to identify the land (Figure 3); and
- A brief description of the nature and purpose of the development (Section 2) and of its possible effects on the environment (see Table 1 in Section 5.2).

A discussion of the screening criteria set out in the EIA Regulations is provided in Section 2; followed by a description of the existing Site and surrounding context in Section 3, and a brief description of the Proposed Development is provided in Section 4.

A screening checklist, as referenced on the Department for Communities and Local Government (DCLG) Planning Practice Guidance (PPG) website¹, has been completed to support this screening request and is presented in Table 1 (Section 5.2).

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2. Requirement for EIA

2.1 Determining the Need for EIA

Developments are termed ‘EIA developments’ if they trigger the requirement for an EIA under the EIA Regulations. Screening of developments to identify whether an EIA is necessary is based on the likelihood of significant environmental effects arising from the project. ‘EIA Developments’ (which can become ‘EIA Applications’) are divided into Schedule 1 and Schedule 2 applications under the EIA Regulations.

Schedule 1 developments, for which EIA is mandatory, constitute those that are likely to have significant environmental effects, such as major chemical or petrochemical projects and construction of ground or air transport infrastructure. For all other developments which fall under Schedule 2, the need for an EIA is determined on the basis of a set of sequential questions as follows:

- Is the development to be located within a sensitive area (as defined by the EIA Regulations)?
- Does it meet any of the relevant thresholds and/or criteria in Column two of Schedule 2?
- Taking account of the selection criteria in Schedule 3, is the proposal likely to have significant effects on the environment?

The flowchart in Figure 1 overleaf, outlines these sequential questions in the EIA Regulations to determine if an EIA is required.

2.2 Approach to Determining Likely Significant Effects

To aid local planning authorities to determine whether a project is likely to have significant environmental effects, a set of indicative thresholds and criteria have been produced within the PPG which is discussed further in Section 5 (Review against the EIA Regulations) of this report.

Should a development project exceed the thresholds for the corresponding class of development, it would need to be determined whether the project would be likely to give rise to significant environmental effects, taking account of the selection criteria presented in Schedule 3 of the EIA Regulations.

When deciding whether a Schedule 2 project is likely to have significant effects, the PPG advises: “When screening Schedule 2 projects, the local planning authority must take account of the selection criteria in Schedule 3 of the [EIA] Regulations. Not all of the criteria will be relevant in every case. Each case should be considered on its own merits in a balanced way and authorities should retain the evidence to justify their decision.”

To assist with considering the merits of the scheme and determining the likelihood of significant effects arising, the DCLG have also produced on the PPG website an example screening checklist to help ensure the relevant issues are considered and provide a clear audit trail. This screening checklist has been adopted and completed to support this screening request, and is provided in Table 1 (Section 5). Table 1 also cross references the selection criteria within Schedule 3 of the EIA Regulations.

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Figure 1. EIA Screening Flowchart
3. The Site and the Surrounding Context

3.1 The Site

The Site is located in Willesden, London, and covers approximately 0.93 hectares (ha). The Site is located on the west of Dudden Hill Lane (A4088), with Colin Road to the south east and High Road (A407) to the south west. The national grid reference for the centre of the Site is TQ 22010 84912.

The majority of the Site has been owned by McGovern Brothers (Haulage) Limited since 1974. The main activity during this period has been the collection and disposal of non-hazardous waste. The business originally operated from two sites in Willesden, the Site (Dudden Hill Lane) and opposite at 25-31 Colin Road. Whilst operations continue at 25-31 Colin Road, the Site became surplus to requirements many years ago. Currently, the Site is subdivided and let to tenants including a scaffolding company, which uses the Site for storing equipment, a marble sales company and a plant hire business. The largest and most prominent building on the Site is used by the site owner for the storage of his collection of vintage haulage vehicles.

The Site is located within the Church End Locally Significant Industrial Site, which is designated in the LBB Core Strategy for industrial employment uses characterised by use classes B1, B2 and B8, or Sui Generic uses6. Locally Significant Industrial Sites are areas protected for employment uses, except in exceptional circumstances where clear benefits can be demonstrated.

Figure 2 provides aerial photos of the Site, while Figure 3 overleaf provides a plan of the Site.

Figure 2. Aerial Photographs of the Site

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Figure 3. Site Location Plan (the Site Boundary is Shown in Red)
3.2 Surrounding Context

The surrounding context is characterised by industrial buildings (predominantly to the north-west) and Victorian terraced housing. Residential housing is located adjacent to the southern boundary of the Site, and these are considered to be the closest sensitive receptors. In addition, along Dudden Hill Lane are a range of retail units offering fast food outlets and convenience shops in addition to other services such as printers and carpet shops. A number of the amenities and facilities within the local area are shown in Figure 4; while other uses in proximity of the Site are provided in Figure 5.

The nearest station is Dollis Hill underground station, approximately 300 metres north-east of the Site (2 minutes' walk from the Site), providing access to Jubilee line services.

The Site is situated within Flood Zone 1 (as defined by the Environment Agency). This zone comprises land which is assessed as having less than a 1 in 1,000 annual probability of river or sea flooding in any year (< 0.1%).
Figure 5. Surrounding Land Uses
4. Description of the Proposed Development

This section provides an overview of the Proposed Development. The design process is ongoing at this stage and will continue up to submission of the planning application; however the main elements of the Proposed Development are described below for the purposes of the EIA Screening exercise.

The Proposed Development will include the demolition of the existing buildings and yard space, which currently accommodates a range of light industrial uses as following:

- Storage: 1,423 m²;
- Plant Hire: 968 m²;
- MOT Garage: 507 m²;
- Temporary Office: 467 m²;
- Café: 78 m²;
- Retail: 93 m²; and
- Substation: 246 m².

The current Site employs 18 persons (assumed to be full time equivalent).

The Proposed Development is a mixed use scheme totalling 24,982 m² floorspace and comprising:

- 16,553 m² Class C3 (proposed use: up to 230 residential units); 
- 1,760 m² Class A1 (proposed use: supermarket, florist); 
- 2,062 m² Class B1 (proposed use: office);  
- 570 m² Class D1 (proposed use: nursery); 
- 243 m² Class A3 (proposed use: café); and  
- 1,827 m² Class D2 (proposed use: gym).

The proposed buildings will vary in height and are anticipated to be between 4 and 9 storeys including the ground floor. It is anticipated that a basement area will be provided to accommodate building services plant and a gymnasium. Figure 6 provides visualisations of the emerging design of the Proposed Development, while the indicative layout is provided in Figure 7.

Up to 230 residential units will be provided as part of the Proposed Development, consisting of a mixture of one to three bed units.

Amenity space will be provided in the form of dedicated, private and shared amenity space. The nursery will be provided with an enclosed, secure external courtyard; similarly, the offices will be provided with a courtyard which will also assist with providing natural light into the units. Each residential unit will be provided with a dedicated balcony or external terrace space which will either comply with or exceed Greater London Authority standards. The aggregated residential amenity space consisting of the balconies, private roof terraces and shared roof terraces will achieve the 20 m² per unit amenity space requirement set out in the LBB’s Supplementary Planning Guidance17. Children’s playspace will be provided within the courtyard at ground floor level at the rear of the site (High Road).

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Figure 6. Visualisations of the Proposed Development
Figure 7. Anticipated Uses within the Proposed Development

Notes: ‘Workshop’ refers to B1 use (office); the split shown between market unit and affordable units is indicative only, and as such no conclusions should be inferred from this image.
5. Review against the EIA Regulations

5.1 Requirements of the EIA Regulations

It is considered that the Proposed Development does not fall under any of the categories of Schedule 1 of the EIA Regulations. Instead, it is considered that the Proposed Development falls within Schedule 2 (10b), ‘Urban development projects’. Assuming the Proposed Development is classified as Schedule 2 (10b), it must be determined whether or not the development will require an EIA.

In response to the sequential questions posed in the EIA Screening Flowchart in the PPG (Figure 1):

- The Proposed Development is NOT located within a sensitive area;
- The Proposed Development is UNDER the development threshold of 5 ha (0.93 ha) and will provide LESS than 1ha of commercial floor space; however the quantum of units within the Proposed Development (230 units) EXCEEDS the applicable criterion (150 dwellings).

Further to the above, paragraph 58 of PPG states in relation to ‘urban development projects’ that:

"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.

Sites which have not previously been intensively developed [are more likely to require EIA if]:

(i) area of the scheme is more than 5 hectares [not exceeded]; or

(ii) it would provide a total of more than 10,000 m² of new commercial floorspace [not exceeded]; 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)."

The Proposed Development does NOT exceed 5 ha, provide more than 10,000m² of new commercial floor space, nor more than 1,000 dwellings. The Proposed Development is also located on brownfield land with an existing light industrial use, and is surrounded by residential and retail development, so is not considered to have a significant urbanising effect on the area. Instead, the Proposed Development will create a new, vibrant, urban environment, transforming what is considered to be a neglected, but highly accessible area.

As required under paragraph 58 of the PPG, the key issues to consider for such development types are the physical scale, and potential increase in traffic, emissions and noise.

The following section of this report aims discusses the requirements of Schedule 3 of the EIA Regulations to determine if the Proposed Development would be likely to give rise to significant environmental effects.

5.2 Screening Checklist

Table 1 provides the EIA screening checklist to assist with considering the Proposed Development and to determine the likelihood of significant environmental effects arising. The nature of the questions being asked in the checklist seek to determine if the Proposed Development would give rise to changes on the surrounding environment (likely / unlikely), and in turn whether the change is likely to result in a significant effect on surrounding environmental and social receptors. In addition, reference is also provided to the criteria comprising Schedule 3 of the EIA Regulations (presented in red font).

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The conclusions presented in this EIA Screening Report have been informed by AECOM's knowledge of the Site and experience of similar mixed used developments elsewhere within London.
Table 1. PPG EIA Screening Checklist for the Proposed Development

<table>
<thead>
<tr>
<th>Questions to be considered</th>
<th>Likely/Unlikely – briefly describe</th>
<th>Is this likely to result in a significant effect Yes/No – why?</th>
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</thead>
</table>
| 1  Will construction, operation or decommissioning of the Project involve actions which will cause physical changes in the locality (topography, land use, changes in waterbodies, etc.)? | Likely.  
There will be changes to the existing ground levels to accommodate the construction of the Proposed Development, including for the basement, which will accommodate the gymnasium and plant. Grading of the Site will be required to establish the proposed levels for construction. All works will be contained within the Site boundary.  
The Proposed Development will replace the predominately industrial uses currently on Site with a 5-9 storey mixed use development that will continue to provide opportunities for industrial businesses combined with residential and retail, as well as other facilities and amenities including a café, nursery, gym, and amenity space and public realm improvements.  
This will result in a change in land uses, however the Proposed Development will enhance the Site and surrounding area with the provision of a well-balanced, mixed-use proposal, that is accessible to the public.  
The nearest watercourse is the Canal Feeder for the Grand Union Canal approximately 800m west of the Site; while the Grand Union Canal itself is approximately 2km south of the Site. The River Brent is situated west of the Canal Feeder, and is approximately 1.8km west of the Site. | No.  
While the Proposed Development will physically alter the Site the Proposed Development is expected to be a beneficial change to the surrounding local environment.  
Due to the distance from the Site, it not expected that the Proposed Development will result in direct effects to the identified watercourses. Indirect impacts to the watercourses and the surrounding drainage network during construction and operation will be managed by standard construction techniques, and during the operational phase by adherence to current legislation, sustainability policy and guidance. |
| 2  Will construction or operation of the Project use natural resources such as land, water, materials or energy, especially any resources which are non-renewable or in short supply? | Likely.  
Natural resources including land, water, materials and energy will be used during construction; some of which use non-renewable resources.  
During the operational phase, natural resources such as energy and water will be consumed. It is proposed that the use of natural resources would be consumed in a sustainable manner, in line with industry best practice and regulatory | No.  
Significant effects are unlikely as a result of the Proposed Development, due to the land uses proposed; none of which are considered to be high energy uses. The Proposed Development will be built and operated in line with current legislation, sustainability policy and guidance. Construction techniques will be employed that make use of local sustainable resources where possible. |
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<th>Questions to be considered</th>
<th>Likely/Unlikely – briefly describe</th>
<th>Is this likely to result in a significant effect Yes/No – why?</th>
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</thead>
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<td>3</td>
<td>Will the Project involve use, storage, transport, handling or production of substances or materials which could be harmful to human health or the environment or raise concerns about actual or perceived risks to human health?</td>
<td>Unlikely</td>
</tr>
<tr>
<td></td>
<td>Relevant to Schedule 3 – part 1 (d), (e), (f) and 3 (a), (c) and (d) of the EIA Regulations.</td>
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<td>4</td>
<td>Will the Project produce solid wastes during construction or operation or decommissioning?</td>
<td>Likely.</td>
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<td>Relevant to Schedule 3 – part 1 (d) and part 3 (a) and (d) of the EIA Regulations</td>
<td>Solid wastes will be produced during demolition, construction, and occupation and decommissioning of the building at all defined project stages.</td>
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<td>During demolition there will be some solid waste associated with demolition of the existing buildings, including some dust generating waste material comprising concrete and soil. During the construction phase some material will be generated from the excavation of a basement area to accommodate building services plant and a gymnasium. Once operational, the Site’s residential, industrial and commercial uses will generate a typical range of waste streams. The end users of the Site are not currently known, so further details cannot be provided; however all waste will be managed in accordance with relevant waste legislation.</td>
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<tr>
<td>Questions to be considered</td>
<td>Likely/Unlikely – briefly describe</td>
<td>Is this likely to result in a significant effect the LBB,</td>
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<td>5</td>
<td>Will the Project release pollutants or any hazardous, toxic or noxious substances to air? Relevant to Schedule 3 – part 1 (e), part 2 (c) of the EIA Regulations.</td>
<td>Unlikely. There are no elements of the Proposed Development that will result in the generation or release of noxious, hazardous or toxic substances to air. During the construction phase, there is potential for dust generation. Appropriate measures will be included in the CEMP to avoid or mitigate impacts to surrounding receptors.</td>
</tr>
<tr>
<td>6</td>
<td>Will the Project cause noise and vibration or release of light, heat energy or electromagnetic radiation? Relevant to Schedule 3 – part 1 (e) and part 2 (c) and 3 (a) and (d) of the EIA Regulations.</td>
<td>Likely. During construction the Proposed Development is likely to result in noise and vibration from construction works, as well as noise from construction traffic; there will also be a requirement for security and working lighting. Once operational, noise generated from traffic accessing the Proposed Development is anticipated, as well as from residents and users. There will also be an increase in lighting compared to the current uses on the Site.</td>
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Questions to be considered | Likely/Unlikely – briefly describe | Is this likely to result in a significant effect
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7 | Will the Project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, | Unlikely. Due to the current and historical land uses (including a dairy, bakery, petrol filling station and more recently haulage/scrap permitted on Sunday or bank holidays; any variation from this will need be agreed with LBB in advance). The CEMP will also include measures to ensure there are no significant effects from construction lighting.

Nevertheless, there is potential for short term significant noise effects during certain stages of the demolition and construction phase at the closest residential receptors (e.g. those adjacent to the Site on Colin Road). Any effects during construction would be temporary and typical of construction sites in urban environments.

Existing residents are accustomed to the industrial uses on the Site, and the Proposed Development is not likely to create significant new noise sources once completed.

The energy plant proposed for the Proposed Development (see the response to Question 2 above), noise attenuation such as acoustic barriers etc. will be incorporated into the design, where required, to achieve appropriate noise emission criterion. It is envisaged that noise from building services plant will be controlled through an appropriate planning condition, as is standard practice.

A noise and vibration impact assessment will be submitted with the planning application that will assess the impact of both demolition/construction and operational noise and vibration at the surrounding sensitive receptors.

A lighting design will also be produced and submitted prior to operation commencing. This will ensure there are no significant effects due to lighting during operation of the Proposed Development.

| Yes/No – why? | No. A Phase 1 Contaminated Land Assessment will be undertaken and submitted with the planning application, which
---|---|---
### Questions to be considered

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<tr>
<th>Groundwater, coastal waters or the sea?</th>
<th>Likely/Unlikely – briefly describe</th>
<th>Is this likely to result in a significant effect</th>
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<tr>
<td>Relevant to Schedule 3 – part 1 (e) of the EIA Regulations.</td>
<td>There is a possibility that contaminants remain on Site which may be a risk to human health. A Phase 1 Contaminated Land Assessment will be undertaken to identify any potential sources of contamination on Site.</td>
<td>Include preparation of a preliminary conceptual model for the Site; this will identify potential pollution sources, pathways and receptors. Furthermore, prior to the demolition and construction phase ground investigations will be undertaken; with remediation undertaken where required.</td>
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#### 8. Are there any areas on or around the location which are already subject to pollution or environmental damage e.g. where existing legal environmental standards are exceeded, which could be affected by the project?

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<th>Likely</th>
<th>No.</th>
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<td>The Site is located in an Air Quality Management Area as a result of exceedances of the annual mean for NO₂ and the 24-Hour mean for PM₁₀. The Phase 1 Contaminated Land Assessment will identify any sites with known environmental damage or where there have been pollution incidents.</td>
<td>During demolition and construction, the Contractor will be required to adhere to a CEMP which will ensure that best practice measures are adopted to minimise risk of pollution and disturbance, including measures for controlling emissions from the Site and construction traffic. This will be submitted to LBB for approval prior to commencement of construction. An air quality assessment will be undertaken for the Proposed Development, including an Air Quality Neutral Assessment for the operational phase of the Proposed Development.</td>
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#### 9. Will there be any risk of accidents during construction or operation of the Project which could affect human health or the environment?

<table>
<thead>
<tr>
<th>Unlikely.</th>
<th>No.</th>
</tr>
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<tbody>
<tr>
<td>With adherence to legislation and best practice, effects on human health or the environment are not likely as a result of</td>
<td>During the demolition and construction phase, appropriate and standard environmental best practice site controls will be implemented. These controls will be documented within the</td>
</tr>
<tr>
<td>Questions to be considered</td>
<td>Likely/Unlikely – briefly describe</td>
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<tr>
<td>Relevant to Schedule 3 – part 1 (f), 3 (d) and 3 (e) of the EIA Regulations.</td>
<td>the Proposed Development.</td>
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<tr>
<td>Will the Project result in social changes, for example, in demography, traditional lifestyles, employment?</td>
<td>Likely.</td>
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<td>Are there any areas on or around the location which are protected under international or national or local legislation for their ecological, landscape, cultural or other value, which could be affected by the project?</td>
<td>Unlikely.</td>
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</table>
## Questions to be considered

<table>
<thead>
<tr>
<th>Likely/Unlikely</th>
<th>Is this likely to result in a significant effect</th>
<th>Yes/No – why</th>
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<td><strong>the EIA Regulations.</strong></td>
<td>However there is a SSSI within 2km of the Site boundary, which is Brent Reservoir (Welsh Harp) SSSI which is located 1.9km north of the site. There are no non statutory designated sites within or adjacent to the Site (i.e. Local Nature Reserves (LNR), Sites of importance for nature conservation (SINC) or Wildlife Corridors), although there are 11 within 1km of the Site. The nearest non statutory site is Metropolitan line between Kilburn and Neasden, Site of Importance for Nature Conservation (SINC) Borough Grade I which is located 320m north of the Site, and is also designated as a Wildlife Corridor. There is one listed building within 500m of the Site; this is the Grade II* listed Church of St Mary, located to the west of the Site. Within 1km there are a further eight listed buildings, a Registered Park and Garden (Roundwood Park) 600m to the south, as well as a Conservation Area (Willesden Green) 550m to the south east of the Site. The Site is not located within an Archaeological Priority Area or a Site of Archaeological Importance.</td>
<td>Increase biodiversity potential on the Site. A Preliminary Ecological Assessment (PEA) (incorporating an Extended Phase 1 Habitat survey) has been undertaken, and will be submitted with the planning application. This assessed the impact of the Proposed Development on nearby ecological sites. The PEA concludes that as there is no ecological linkage between Brent Reservoir (Welsh Harp) SSSI and the Site it is considered highly unlikely to be affected by the Proposed Development. Furthermore, no non-statutory sites are likely to be affected by the Proposed Development due to the distance from the works, and the lack of ecological connectivity to the Site. An Archaeological Assessment and a Townscape, Heritage and Visual Impact Assessment (THVIA) will be undertaken and submitted with the planning application to ensure no significant adverse effects on built heritage, the Willesden Green conservation area or archaeological resources.</td>
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<td>Unlikely. The land on the Site around the buildings consists of hard standing and bare ground. There are also no statutory or non-statutory sites designated for their nature conservation value present within the Site boundary, or in proximity to the Site that could be affected by the project (see question 11 for further information).</td>
<td>No. It is considered unlikely that any of the other areas on or around the location of the Proposed Development that are important or sensitive for reasons of their ecology would be impacted by the project. This is either because of their distance from the Site and lack of ecological connectivity, or because they are not considered to be sensitive to the changes that would be brought about by the Proposed Development. Standard best construction methods will be implemented as part of the CEMP to avoid construction activities resulting in potential indirect impacts (e.g. dust deposition, pollution/spillage during construction, noise or construction</td>
</tr>
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</table>

12. Are there any other areas on or around the location which are important or sensitive for reasons of their ecology e.g. wetlands, watercourses or other waterbodies, the coastal zone, mountains, forests or woodlands, which could be affected by the project? Relevant to Schedule 3 – part 2 (a) and 2 (c) of the EIA Regulations.
Questions to be considered | Likely/Unlikely – briefly describe | Is this likely to result in a significant effect
--- | --- | ---
13. **Are there any areas on or around the location which are used by protected, important or sensitive species of fauna or flora e.g. for breeding, nesting, foraging, resting, overwintering, migration, which could be affected by the project?** | **Unlikely.**
A PEA has been undertaken to determine whether there is any potential on the Site for protected species to be present and if appropriate to recommend any further ecological surveys or mitigation that may be required. The Site is currently comprised of hardstanding and buildings, with a significant degree of disturbance due to the current land uses on the Site, and as such the PEA concludes that the Site is of low ecological value. | **No.**
Mitigation from the PEA will be included within the CEMP to avoid construction activities resulting in potential direct or indirect impacts on protected species as appropriate; this will include recommendations for nesting birds. | lighting) on adjacent sites and surrounding habitats during construction.

14. **Are there any inland, coastal, marine or underground waters on or around the location which could be affected by the project?** | **Unlikely.**
There are no coastal or marine waters within or near to the Site. The nearest watercourse is the Canal Feeder for the Grand Union Canal approximately 800m west of the Site; while the Grand Union Canal is approximately 2km south of the Site. The River Brent is situated west of the Canal Feeder, and is approximately 1.8km west of the Site. The Site is not situated in a groundwater protection area. | **No.**
During the demolition and construction phase, onsite activities would be effectively controlled by employing standard management practices and regulatory requirements. These would be implemented through adherence to the CEMP and would prevent contamination to groundwater, surface water or the wider environment. | lighting) on adjacent sites and surrounding habitats during construction.

15. **Are there any areas or features of high landscape or scenic value on or around the location which could be affected by the project?** | **Unlikely.**
There are no Areas of Outstanding Natural Beauty in proximity to the Site. Roundwood Park, located 600m south of the Site, is a Registered Park and Garden. | **No.**
The Proposed Development has been sensitively designed to be in keeping with the local context of the surrounding area. The Proposed Development will increase the Site’s visibility, but the buildings will be read in conjunction with the existing townscape.

A THVIA will be undertaken and submitted along with the planning application. This will assess the impact of the Proposed Development on Roundwood Park, along with views from the Conservation Area and affected listed buildings.
<table>
<thead>
<tr>
<th>Questions to be considered</th>
<th>Likely/Unlikely – briefly describe</th>
<th>Is this likely to result in a significant effect Yes/No – why?</th>
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<tbody>
<tr>
<td>16 Is the project in a location where it is likely to be highly visible to many people?</td>
<td>Likely. The Proposed Development will be visible from various perspectives throughout the surrounding local area. The most sensitive views are identified as being from neighbouring residential properties surrounding the Proposed Development, as well as from Roundwood Park and Willesden Green Conservation Area.</td>
<td>No. The Proposed Development is not expected to result in significant adverse effects on these views, given that the development will appear as a contextual addition within the existing urban townscape. The Proposed Development is considered likely to have a beneficial effect as a result of the design of the buildings with regard to height, scale and materials.</td>
</tr>
<tr>
<td>17 Are there any routes on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the project?</td>
<td>Unlikely. The London Cycle Network is located opposite the Site to the north east, on Chapter Road. There are no other known routes used for recreation around the Site.</td>
<td>No. It is not currently envisaged that there will be any impact on the London Cycle Network, however if this were to be the case, any impact would be temporary, and during this period. Temporary diversions and notices will be provided to the public to ensure access is still possible. Information on any footpath and road closures will be provided within a Construction Logistics Plan (CLP).</td>
</tr>
<tr>
<td>18 Are there any transport routes on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the project?</td>
<td>Likely. The Proposed Development is likely to generate additional vehicle traffic that may have an effect on the local highway and local road network.</td>
<td>No. A Transport Assessment will be prepared and submitted as part of the planning application documents. The impact of the Proposed Development on existing road networks, walking and cycling routes and bus and rail/tube services will be considered.</td>
</tr>
<tr>
<td>19 Are there any areas or features of historic or cultural importance on or around the location which could be affected by the project?</td>
<td>Unlikely. There is one listed building within 500m of the Site; this is the Grade II* listed Church of St Mary located to the west of the Site. Within 1km there are a further eight listed buildings, a Registered Park and Garden (Roundwood Park) 600m to the</td>
<td>No. The Proposed Development has specifically been designed to respond positively to the scale, form and character of the existing townscape, so any potential for adverse changes to the setting of these assets is limited and no significant</td>
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<td>and (c) of the EIA Regulations.</td>
<td>south, as well as a Conservation Area (Willesden Green) 550m to the south east of the Site. The Site is not located within an Archaeological Priority Area or a Site of Archaeological Importance.</td>
<td>adverse effects are anticipated.</td>
</tr>
<tr>
<td>20</td>
<td>Is the project located in a previously undeveloped area where there will be loss of greenfield land? Relevant to Schedule 3 – part 2 (a) of the EIA Regulations.</td>
<td>Unlikely. The Site has been developed, and consists of buildings and hardstanding.</td>
</tr>
<tr>
<td>21</td>
<td>Are there existing land uses on or around the location e.g. homes, gardens, other private property, industry, commerce, recreation, public open space, community facilities, agriculture, forestry, tourism, mining or quarrying which could be affected by the project? Relevant to Schedule 3 – part 2 (a) and 2 (c) of the EIA Regulations.</td>
<td>Likely. There are a range of land uses surrounding the Site, as shown in Figure 5 (see Section 3.2 of this report). Adjacent residential properties on Colin Road are considered to be the most sensitive to the redevelopment of the Site.</td>
</tr>
</tbody>
</table>
### Questions to be considered

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<tr>
<td>Are there any areas on or around the location which are densely populated or built-up, which could be affected by the project?</td>
<td>Unlikely. The Site is located within a built up area, consisting of a mixture of residential, retail and industrial land uses, typically of a few storeys high.</td>
<td>No. The Proposed Development is not considered to have a significant adverse effect on the local area as it has been sensitively designed in line with the context of the area and provides comparable land uses to what already surrounds the Site. The Proposed Development will provide socio economic benefits to the local area as well as regenerating the Site and local community.</td>
</tr>
</tbody>
</table>
| Are there any areas on or around the location which are occupied by sensitive land uses e.g. hospitals, schools, places of worship, community facilities, which could be affected by the project? | Unlikely. The following land uses are located within approximately 100m of the Site:  
• The Jewish Cemetery (south);  
• Willesden New Cemetery (south west);  
• College of North West London (north west);  
• Willesden Seventh-day Adventist Church (south); and  
• Dudden Hill Community Centre (south east). | No. Intervening developments between the Site and the noted land uses mean that it is not considered likely that significant effects will occur. |
<p>| Are there any areas on or around the location which contain important, high quality or scarce resources e.g. groundwater, surface waters, forestry, agriculture, fisheries, tourism, minerals, which could be affected by the project? | Unlikely. There are no areas of important, high quality or scarce resources in proximity to the Site that are likely to be affected by the Proposed Development. During construction and operation there is the potential for the release of chemical contaminants into the surface water network and discharge to controlled waters. | No. Mitigation measures will ensure that the risk of spills (and potential for contamination of groundwater) is managed during construction and emergency procedures are followed should a spill arise (e.g. compliance with regulatory waste disposal controls and hazardous material management). These measures would be set out in the CEMP. No significant adverse effects are anticipated once the Proposed Development is completed and occupied. |</p>
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<td>Regulations.</td>
<td></td>
<td>Sustainable Drainage System (SuDS) will assist in reducing flood risk. Runoff from the Proposed Development will be discharged to the Thames Water Utilities Limited (TWUL) public sewer network and will be reduced as far as practicable in accordance with the London Plan, LBB and in agreement with TWUL.</td>
</tr>
<tr>
<td>25 Is the project location susceptible to earthquakes, subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions e.g. temperature inversions, fogs, severe winds, which could cause the project to present environmental problems?</td>
<td>Likely (surface water flooding only). The Site is located in an urban suburb of London and not in a location which is susceptible to these types of events. The only possible exception to this would be surface water flooding.</td>
<td>No. A site-specific Flood Risk Assessment will be undertaken for the Proposed Development to confirm in further detail whether the Site may be at risk of flooding (e.g. from surface water), and recommend appropriate mitigation measures. It is considered that the Site is at low risk of flooding and that appropriate mitigation measures can be implemented to manage any residual risk. These mitigation measures will ensure that the Proposed Development has no adverse impact on the Site or its surrounding area with respect to flood risk and that the residents and users of the buildings will be safe from all sources of flooding. Therefore, the Site is considered appropriate for its intended use and there are no significant effects in terms of flood risk likely as a result of the Proposed Development.</td>
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<td>26 Are there any plans for future land uses on or around the location which could be affected by the project?</td>
<td>Unlikely. There are no known strategic proposals for developments in the area immediately surrounding the Site that need to be taken into account when assessing the impacts of the Proposed Development. Any relevant cumulative schemes would be a sufficient distance from to the Site that significant cumulative effects in combination with the Proposed Development are unlikely.</td>
<td>No. Besides temporary significant construction effects at neighbouring residential properties, which are local to the site, no significant effects are predicted during operation; therefore the potential for significant cumulative effects during operation is considered unlikely. Were there to be construction works occurring in proximity to the Site at the same time as the construction and demolition works for the Proposed Development (though none are currently known) any cumulative effects would be managed</td>
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### Questions to be considered

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<thead>
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<td>by a CEMP and CLP that will be approved by LBB.</td>
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<td>A CEMP will be prepared in order to control environmental</td>
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<td>effects such as dust emissions and construction noise. The</td>
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<td>introduction of best practice mitigation measures such as the</td>
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<td>use of site hoardings, ensuring all plant meets relevant</td>
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<td>statutory requirements and use of a wheel washing system to</td>
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<td>control dust emissions will reduce potential effects. The</td>
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<td>CEMP will be agreed with LBB prior to commencement of the</td>
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<td>works.</td>
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<td>The CLP will provide information on construction traffic, and</td>
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<td>will take account of other developments being constructed at</td>
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<td>the same time to ensure there are no cumulative effects.</td>
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<td>27</td>
<td>Are there any other factors which should be considered, such as consequential development which could lead to environmental effects, or the potential for cumulative impacts with other existing or planned activities in the locality?</td>
<td>Unlikely</td>
</tr>
</tbody>
</table>

Relevant to Schedule 3 – part 1 (b) and 3 (a), 3 (c), and 3 (e) of the EIA Regulations.
6. Planning Application / Environmental Associated Reports

On the basis that an EIA is not required it is intended that the following environmental reports and related documents will be submitted with the planning application:

- Preliminary Ecological Appraisal;
- Flood Risk Assessment;
- Phase 1 Contaminated Land Assessment;
- Noise and Vibration Assessment;
- Air Quality Impact Assessment;
- Wind Microclimate Assessment;
- Daylight, Sunlight and Overshadowing Study (including internal);
- Townscape, Visual and Heritage Impact Assessment;
- Archaeology Assessment;
- Sustainability Statement and Energy Assessment, including a BREEAM pre-assessment;
- Transport Assessment;
- Service and Delivery Plan;
- Travel Plans;
- Car Park Management Plan;
- Lighting Assessment;
- Ventilation and Extraction Statement; and
- Operational Waste Management Strategy.
7. Summary

The Proposed Development does not fall within any of the categories of Schedule 1 of the EIA Regulations. Instead, it is considered that the Proposed Development falls within Schedule 2 (10b), ‘Urban development projects’. As the Proposed Development is classified as Schedule 2 (10b), it must be determined whether or not the development will require an EIA.

The Proposed Development is NOT located within a sensitive area; it is UNDER the development threshold of 5 ha (0.93 ha), it will provide LESS than 1 ha of commercial floor space; however the quantum of units within the Proposed Development (up to 230 units) EXCEEDS the applicable criterion (150 dwellings). Therefore it is necessary to determine if the Proposed Development would be likely to give rise to significant environmental effects, as required by Schedule 3 of the EIA Regulations.

The information supplied in Section 5.2 of this report seeks to provide sufficient information to support LBB in determining whether the Proposed Development represents EIA Development in accordance with Schedule 3 of the EIA Regulations.

It is not considered that the Site, the Proposed Development and/or its potential environmental effects trigger the Schedule 3 criteria, particularly given the design, land use planning and environmental management controls that can be expected to be applied. It is acknowledged that there may be temporary significant construction effects at neighbouring residential properties; however these will be managed by a CEMP and CLP that will be approved by LBB; and are typical of construction effects at developments located within urban areas.

It is therefore respectively concluded that an EIA is not required. Figure 8 provides AECOM's informed opinion on the EIA Screening determination.

Accordingly we request a formal EIA Screening Opinion from the LBB in its capacity as the relevant planning authority under Regulation 5(1) of the EIA Regulations to confirm that an EIA is not required for the Proposed Development. We look forward to receiving the Screening Opinion within the statutory three week period.
Figure 8. Annotated EIA Screening Determination Route\(^9\)

(The red arrows denote AECOM’s opinion in the EIA Screening determination at each of the sequential stages of the flowchart)

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