

Redevelopment of Hereford House, Exeter Court and Granville Park, South Kilburn, NW6 5QH

Request for Screening Opinion Addendum Document

Town and Country Planning (Environmental Impact Assessment) Regulations 2017

6th December 2018

Further to correspondence from the London Borough of Brent, received on the 30th May 2018, establishing that the proposed development of Hereford House and Exeter Court did not require an EIA to be undertaken, we submit an addendum to the original screening request which covers the site at Granville Park that is now included within the proposed red line boundary.

The redevelopment of Granville Park will therefore be included within the overall planning application for Hereford House and Exeter Court. It will include a separate 4/5 storey building comprising some 20 residential units, which should be considered cumulatively with the proposals for Hereford and Exeter, which comprise buildings ranging from 5 storeys to 13 storeys and some 228 residential units.

The revised description of development is therefore proposed to read:

"The demolition of the existing Hereford House and Exeter Court and the construction of 248 new residential buildings, including 20 maisonettes on the current Granville Road Park, with (300 sqm) ground floor retail floorspace in Building C, a new public, urban park and new access road along the Western side of the Site (Granville Lane)."

Reference should be made to the original screening request dated 14th May 2018.

This request is made in pursuance of Regulation 5 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2011 (the regulations).

To enable your consideration of this amendment, we set out the following below:

- A brief description of the Granville Park Site;
- A brief description of the proposal for Granville Park;
- A review of the requirement for an EIA for the site.

1 Description of the Granville Park Site

- 1.1 The red line boundary site plan submitted in support of this screening request identifies the location and extent of the land subject to this request. The site is currently occupied by the Granville Road Play Area and can only be accessed via Granville Road (located to the South of the site).

2 Description of the Proposed Development

- 2.1 The proposal comprises 20 new three bed, family homes in a stacked maisonette arrangement. The buildings will be 4 storeys tall with a set back roof terrace at 5th floor level. They will sit aligned with the existing neighbouring building frontages along Granville Road. The ground floor units will have traditional back to back gardens and the units above will have a generous roof-top amenity terrace.

2.2 All 20 units will be social rent.

3 Requirement for EIA

3.1 Scale of development

The proposal represents the redevelopment of Granville Road Play Area, alongside the redevelopment of the Hereford House and Exeter Court sites. The proposal for Granville Park is not of a significant scale or height relative to existing surrounding buildings in the area. Thus, the impact of the proposed development does not constitute an impact which is of a markedly different nature.

3.2 Trees and Ecology

The Site does not form part of any statutory nature conservation site. A Preliminary Ecological Appraisal will be undertaken on the site in support of the overall planning application.

There are a number of trees on the site. An Arboricultural Survey will be carried out, which will identify mitigation measures to address any unavoidable impacts on existing trees, including strategies for replacement and new planting. This survey will be submitted in support of the overall planning application.

3.3 Noise and Dust during construction

Sensitive receptors to noise and dust include the residential properties and educational institutions in the vicinity of the site. The proposed development may impact the noise and air quality climate of these receptors during construction due to:

- increased construction traffic activity (e.g. delivery of materials); and
- general construction works (e.g. hammering and piling).

These construction activities will be for a limited period of time and can be suitably managed through dust and noise control measures in a Construction and Logistics Plan (CLP) incorporating a Site Waste Management Plan to ensure major effects arising from noise and dust disturbances are minimised and appropriately mitigated.

3.4 Potential increase in traffic, emissions and noise

A Transport Assessment will be submitted in support of the overall planning application. This assessment will assess the potential impact of the proposed development in terms of traffic volumes, circulation on and around the site, and impacts on public transport infrastructure and propose an necessary mitigation measures.

3.5 Heritage and Visual Impact

While there are no statutorily designated heritage assets within the redline of the site, the South Kilburn Conservation Area is located to directly adjacent to the site. As such the setting of the Conservation Area will be a material consideration for this application. The impact of the proposal on the South Kilburn CA will be addressed within the Design and Access Statement and Heritage Statement that will accompany the application.

In terms of visual impact, the most sensitive issue with regard to the redevelopment of this site is the setting of the South Kilburn Conservation Area to the north of the site.

The visual impact of the proposed development on the townscape of the surrounding area will be addressed within the Design and Access Statement that will accompany the application.

3.6 Contamination

A contamination assessment will be submitted in support of the overall planning application.

3.7 Flood Risk and Drainage

A Desktop Flood Risk Screening indicates that the site is located within Flood Zone 1 and is not considered to be at significant risk of flooding. The proposed uses are classified as 'More Vulnerable' in the National Planning Policy Framework (NPPF) Technical Guidance. In accordance with the Technical Guidance, and using the Sequential Approach, the proposed development is deemed to be compatible with this Flood Zone.

4 Summary

4.1 The table below evaluates the proposed development against the criteria set out in the Planning Practice Guidance's (section 10 (b)) Annex to EIA setting out indicative screening thresholds:

Criterion	Comment
Is the development of a significantly greater scale than the previous use?	Yes, however, the scale of the proposed development is comparable to existing surrounding uses.
Are the types of impact of a markedly different nature?	No. The impacts are similar in nature to existing surrounding uses.
Is there a high level of contamination?	It is assumed that there is not a high level of contamination. A desktop land contamination assessment will be undertaken to confirm this.

4.2 Having taken account of the selection criteria in Schedule 3 to the EIA Regulations we consider that the proposed development is unlikely to give rise to significant effects on the environment.

4.3 We therefore conclude that the impacts of the development proposals are unlikely to be significant enough to justify an Environmental Statement. We would therefore request that Brent Council issue a screening opinion confirming the proposed development is not an EIA development within the meaning of the EIA Regulations.

4.4 The various studies undertaken to date and currently underway will be submitted as supporting information with the planning applications. Whilst these do not constitute an Environmental Statement, they will enable the potential effects of the proposed development to be identified and assessed. The applicants are willing to accept planning conditions to ensure the implementation of reasonable mitigation to avoid or minimise adverse effects.

