

20th December 2018

Delivered by email and post

Principal Planning Officer
Regeneration & Environment
London Borough of Brent
Civic Centre
Engineers Way
Wembley
HA9 0JF

Dear Sir,

REQUEST FOR SCREENING OPINION PURSUANT TO REGULATION 5 OF THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (AS AMENDED).

PEEL PRECINCT, 97-112 CARLTON HOUSE AND 8-14 NEVILLE CLOSE, 2 CANTEBURY CLOSE AND ASSOCIATED PEEL SITE GARAGES.

Introduction

We are writing on behalf of our client, Countryside Properties ('the applicant') to request an Environmental Impact Assessment (EIA) Screening Opinion pursuant to Regulation 5 of the Town and Country Planning (EIA) Regulations 2017 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 6(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 full planning application, and a DRAFT plan illustrating the Proposed Development is attached (Map 3). We have also included a consented plan for the 2017 hybrid planning permission 16/4174 (Map 4) which is attached for information. 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. As a result

8th Floor Lacon House
84 Theobalds Road
London WC1X 8NL

T 020 7851 4010 turley.co.uk

there is no existing Environmental Statement covering the Masterplan proposals as a whole. Further information about the Masterplan is set out below.

The site is subject to an extant planning permission (Ref. 16/4174) granted in early 2017, which is to be part implemented by Countryside Properties to deliver Block E of the consented development at the earliest opportunity (a block of social rented affordable housing), to re-house existing tenants and to enable the redevelopment of the wider site. This consented scheme is to be revised through the new full planning application proposed for the site by Countryside, however the design principles and approach are consistent with the consented scheme, including the location of buildings and open space, the proposed uses and the predominant approach to height, bulk and massing across the site. The consented scheme is for the following development:

Hybrid Application for the proposed redevelopment of the Peel site comprising Peel Precinct, 97-112 Carlton House, 8-14 Neville Close, 2 Canterbury Road & Peel site garages:

Full planning application for the demolition of 2A Canterbury Road, 1-7 and 15-33 Peel Precinct and 8-14 Neville Close, and erection of four buildings (A, B, C and E) ranging between four to 16 storeys, plus part basement comprising of 38 replacement affordable homes for existing South Kilburn secure tenants, 64 private sale units (38 x 1-bed, 47 x 2-bed, 13 x 3-bed and 4 x 4-bed units) new health centre (Use Class D1) with flexible first floor space (Classes A1/D1/D2), 3no A-class retail units at ground floor, associated landscaping, highways and public realm improvements (including new public space), private open space, associated car parking, cycle parking and servicing provision.

Outline planning application with reserved matters (around Appearance, Landscaping, and Scale) for the demolition of 97-112 Carlton House, 34-57 Peel Precinct and Peel site garages, and erection of three buildings (D, F and G) ranging in height between up to 4 and up to 8 storeys provide up to 124 residential units comprising of 4 Affordable Housing units, and up to 120 private units, with associated landscaping, private open space, and cycle parking.

A Screening Opinion letter was submitted pursuant to application 16/4174 and LB Brent's Screening Opinion, dated 24th June 2016 confirms that an Environmental Impact Assessment was not required in relation to that proposal. It should be noted that the present proposal maintains many of the design principles as per the consented scheme, and it is not anticipated that Brent would have cause to require an EIA given the relatively limited changes to the approved scheme that are now proposed in comparison to the consented scheme.

The Site and Surroundings

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 bound by the relatively 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, 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 majority of buildings on the site have been vacated in anticipation of the consented redevelopment, given extant planning permission 16/4174, and the wider South Kilburn masterplan and associated managed relocation of occupiers.

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.

It is understood that a planning application will be shortly submitted for the site to the north of Peel, known as the NWCC site. The NWCC planning application and the Proposed Development subject of this screening opinion have been developed in consideration of each other in terms of building proximity, heights and massing and other considerations. The NWCC application of course has to have regard to the consented hybrid application for Peel,

where consented block D (as part of the outline consent) is the most relevant block, being adjacent to the southernmost boundary of the NWCC site.

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 demolition and redevelopment of all existing buildings on site (as set out on Map 3), to provide new affordable and private residential accommodation (Class C3) alongside a new health centre (class D1), A-class retail uses and other flexible commercial space (flexible A and B class use), D2 class leisure in the form of a gym, and a new flexible public square with associated landscaping, car and cycle parking. The Proposed Development is a refined version of the permitted scheme, ref. 16/4174, as described to officers during the extensive pre-application process over 2018, and as set out at the public consultation events undertaken throughout Autumn 2018.

The Proposed Development is being submitted in the form of a full planning application for the following description of development:

Redevelopment of the Peel site comprising Peel Precinct, 97-112 Carlton House, 8-14 Neville Close, 2 Canterbury Road & Peel site garages: Full planning application for the demolition of 2A Canterbury Road, 1-7 and 15-33 Peel Precinct and 8-14 Neville Close, and erection of seven buildings (A to G) ranging between 5 and 16 storeys, plus part basement, comprising 187 private sale units (Use Class C3), 79 shared ownership units (Use Class C3), 42 social rented units (Use Class C3), a new health centre (Use Class D1), new gym (Use Class D2), Flexible A-class retail units and B-class commercial units at ground floor, associated landscaping, highways and public realm improvements (including new public space and market square), private open space, associated car parking, cycle parking and servicing provision.

The Proposed Development seeks to meet the aims and objectives of the Masterplan as set out in the previous section to deliver Peel as the Civic Hub of South Kilburn, 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 square connecting Canterbury Road to Carlton Vale, which will be landscaped and future proofed for the potential provision of a street market.

The masterplan has been refined in this subsequent application, the permitted linear square is now redesigned and extended to incorporate a 'market square' at the northern end, achieved through an amended orientation of buildings F and G, to provide an enhanced pedestrian route between Carlton Vale and Canterbury Road, and enhanced flexible public open space with significantly enhanced greening and landscaping.

Housing delivery is enhanced through this application, with 308 units now proposed within the site, including 40% affordable housing, achieved through the provision of an additional 79 intermediate shared ownership units, while the 42 social housing units are retained as consented. It is considered that this represents an enhancement in meeting Brent's strategic policy objectives around housing delivery and affordable housing provision. Additional commercial space is provided in the ground floor of block F and G, fronting on to the new market square, providing enhanced employment and economic opportunities for South Kilburn. A new gym is introduced to the development within block B and C as a complementary function to the health centre, and as a further amenity for residents.

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), with a range of heights from predominantly 4-10 storeys in height, rising to a Ground plus 15 storey taller residential building fronting Carlton Vale (Block A), which remains unaltered within the new application. 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.

For avoidance of doubt, the height of Block A and Block E are unaltered from the consented planning permission, while modest increases are proposed to the remainder of the blocks to optimise housing delivery and support the provision of increased affordable housing at Peel. The increase in housing provision is mainly achieved through the optimisation and reorganisation of internal layouts and efficiencies across the site, which allows additional units to be provided without affecting residential quality or amenity. In addition, the modest increase in height to some of the blocks achieves further increases in residential provision and density in line with the strategic objectives of Brent and the Mayor of London.

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 and public street layout provides for a connection between Canterbury Road to Carlton Vale, as well as significant space for community activities, which is achieved through the provision of a new market square at the northern end of the existing public space, delivered through the re-orientation of blocks F and G, and re-imagining of the landscaping strategy to provide communal residential amenity space on the roofs of those blocks.

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 environment 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, while also bearing in mind the Council's consideration of the screening opinion for the consented scheme, which is not EIA development.

The 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. These considerations have also been assessed in relation to the extant permission.

The submission requirements have been agreed with London Borough of Brent officers and will include the following technical assessments and reports:

- Existing plans and layouts
- Demolition plans
- Proposed drawings, plans, layouts and elevations
- Planning Statement
- Design and Access Statement
- Heritage, Townscape and Visual Impact Assessment
- Daylight & Sunlight Assessment
- Wind & Microclimate Assessment
- Sustainability Assessment
- Energy Assessment
- BREEAM Pre-Assessment

- Ventilation & Extraction Strategy
- Flood Risk Assessment and Drainage Report
- Foul Sewage and Utilities Assessment
- Noise Assessment
- Air Quality Assessment
- Waste Strategy
- Parking and Transport Assessment
- Draft Travel Plan
- Landscaping Strategy
- Tree Survey
- Affordable Housing and Viability Assessment
- Planning Statement
- Economic Statement
- Land contamination assessment
- Statement of Community Involvement

Determining whether EIA is required

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 5(4)(c) 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, risk of accident and/or disasters and risks to human health);
2. The environmental sensitivity of the geographical areas likely to be affected by the development (with regard to existing and approved land use, natural resources in the area, absorption capacity of the natural environment, with regard to particular types of area); and
3. The type and characteristics of the potential impact in the context of the above two points (having regard in particular to those matters covered in Regulation 4(2) (the effects on population, human health, land, soil, water and climate, material assets, cultural heritage and landscape and the interaction of these factors, and the magnitude and spatial extent, nature of, transboundary nature, intensity and complexity, probability, onset, duration, frequency and reversibility of the impact, plus the cumulation of the impact and the possibility of effectively reducing the impact).

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

Only a very small proportion of Schedule 2 development will require an Environmental Impact Assessment. While it is not possible to formulate criteria or thresholds which will provide a universal test of whether or not an assessment is required, it is possible to offer a broad indication of the type or scale of development which is likely to require an assessment. It is also possible to provide an indication of the sort of development for which an assessment is unlikely to be necessary. 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. See the indicative thresholds and criteria. The table also gives an indication of the types of impact that are most likely to be significant for particular types of development.

The PPG refers to indicative thresholds and criteria, within an Annex to the PPG titled *Indicative screening thresholds*, which states:

The criteria and thresholds in column 2 represent the 'exclusion thresholds' in Schedule 2 of the Regulations, below which Environmental Impact Assessment does not need to be considered (subject to the proposal not being in a sensitive area). The figures in column 3 are indicative only and are intended to help determine whether significant effects are likely. However, when considering the thresholds, it is important to also consider the location of the proposed development.

In general, the more environmentally sensitive the location, the lower the threshold will be at which significant effects are likely. It follows, therefore, that the thresholds below should only be used in conjunction with the general guidance on determining whether Environmental Impact Assessment is required and, in particular, the guidance on environmentally sensitive areas. Column 4 illustrates the issues that are most likely to need to be considered for different development types. However, there will be other issues which will be specific to the nature of the environmental receptor. For example, ecological impacts are likely to be an issue for all development which is proposed to be located in a Site of Special Scientific Interest designated for its wildlife value.

Within the indicative screening thresholds table, for 10(b) schemes (urban development projects) it is noted in the third column 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.

Indicative criteria and thresholds for land which has not previously been developed is also set out in the third column, as follows:

Sites which have not previously been intensively developed:

- (i) area of the scheme is more than 5 hectares; or
- (ii) it would provide a total of more than 10,000 m² 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).

Key issues to consider, as set out in the fourth column are: *physical scale of such developments, potential increase in traffic, emissions and noise.*

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 building within 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 South Kilburn 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 application buildings comprise the following:

- Building A (Ground plus 15 storeys) is a residential building with ground floor commercial use (massing unchanged by the revised scheme),
- Building B (Ground plus 6 storeys – a 1 storey increase from the consented scheme), comprising health centre and gym entrance at ground floor, health centre at first floor, gym at second floor and residential above.
- Building C (Ground plus 9 storeys – a 2 storey increase from the consented scheme) which incorporates retail at ground floor, the health centre at first floor, and gym at second floor with residential above.
- Building D (Ground plus part 7-9 storeys – a 2 storey increase from the consented scheme).
- Building E (Ground plus part 3/4/5 storeys - unchanged by the revised scheme).
- Building F (Ground plus 5 storeys – as per the consented scheme), including flexible commercial uses at ground floor.
- Building G (Ground plus 6 storeys – a 2 storey increase from the consented scheme), including flexible commercial uses at ground floor.

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, setting out a clear comparison of

the proposals against the consented scheme, which is also considered and set out in the appropriate supporting reports including the HTVIA and the Daylight and Sunlight Report.

There will be a separate Townscape, Heritage and Visual Impact Appraisal, including 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 submitted documents in support of the permitted application also set this out and overall the revised proposal is not fundamentally different in scale to that already permitted, with two of the buildings remaining unaltered in terms of their height. The buildings that are subject to change are set within the site and away from the South Kilburn Conservation Area, and have been developed in consideration of neighbouring existing buildings and future proposals for neighbouring sites (as set out in the South Kilburn SPG).

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 (where this has changed from the baseline work already undertaken), 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.

The layout, design and massing of the proposed buildings respond 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 a wider distance across the proposed 'Market Square' of approximately 37m. This will be set out in the design and access statement.

The pre-application daylight and sunlight assessment concludes that while there are changes to individual windows and buildings as a result of the revised design, that the overall level of impact remains comparable to the consented scheme. 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 and was submitted in relation to the extant scheme.

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, and which will be developed in consideration of other emerging developments in South Kilburn. 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. The on street parking capacity analysis submitted with the extant scheme indicates that there is 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. This will be re-assessed in the Transport Assessment for the Proposed Development, but is recent (studied in 2016) and is therefore considered to remain robust. It is predicted 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. In support of the extant permission,

analysis has been undertaken which has surveyed the existing baseline air quality around the site, and assessed 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 and 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 which will also be set out in the Construction Management Plan, 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). The Air Quality Assessment submitted with the extant permission also addressed this issue to the satisfaction of the LPA and relevant statutory consultees.

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, as it has been for the extant permission.

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 analysis has been undertaken and submitted with the extant permission, 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 focused on noise from plant, as the main potential source of noise from the Proposed Development, and analysis 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 with accompanying active and passive design measures to deliver policy requirements.

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 commercial 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.

The energy strategy will build on that already consented, and 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 will reduce regulated CO2 emissions 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 for the consented scheme, a wind assessment has been undertaken, which remains partially relevant for the Proposed Development, albeit it will be updated for the planning submission to reflect revisions to the scheme and the design approach as discussed at the pre-application stage.

The assessment methodology adopts 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 and are set out in the wind and microclimate assessment for the consented hybrid scheme.

It is not anticipated that the analysis associated to the consented scheme will vary significantly for the Proposed Development given general consistency in the design approach. The analysis for the consented scheme indicates that the consented 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 consented 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 consented 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, given the outcomes of the report accompanying the consented scheme, and the nature of the design changes associated to the Proposed Development, which itself will be accompanied by an appropriate report.

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.

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. It is understood that an application for the NWCC site to the north of Peel will be coming forward shortly. 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 also submitted in relation to the extant permission, and 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 revised landscaping strategy, 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 proposal includes roof gardens and terraces with additional planting and greening, enhanced tree planting from the consented scheme, and increased provision of public open space and public realm including the new market square. The landscaping strategy will also include planters and seating along the public space to create a connection to the park, and has been presented to officers at pre-application stage.

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, which will deliver environmental benefits in terms of planting, greening and biodiversity.

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, and builds on a consented hybrid planning permission which the Council has previously agreed was not EIA development. The approach in the revised Proposed Development is similar in terms of principles and the design approach as set out above, with amendments not considered to lead to any significant environmental effects.

In summary, the baseline conditions and any potential significant environmental effects have been assessed in a number of pre-application assessments, and indeed in the final assessments submitted with the consented hybrid scheme. Final versions of all relevant assessments will be submitted with the planning application for the new Proposed Development. At the same time, the findings of some of the reports associated to the consented hybrid application remain relevant and provide some further context, particularly around baseline conditions and the effect of some of the principles of development.

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 planning application for the Proposed Development.

Enclosed:

Map 1: Site Location Plan

Map 2: Existing Site Layout Plan

Map 3: Proposed Development Site Layout Plan – DRAFT at time of EIA screening submission

Map 4: Consented Site Layout Plan (Ref. 16/4174)

Map 5: South Kilburn Masterplan phasing diagram.

Map 1: Site Location Plan

Map 2: Existing Site Layout Plan

Map 3: Proposed Site Plan

Map 4: Consented Hybrid Application Site Plan (16/4174)

Map 5: South Kilburn Masterplan phasing diagram