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Our ref: 62232/01/BK/NSt/19464647v2

Dear Sir / Madam

The Town and County Planning (Environmental Impact Assessment) Regulations 2017 (as updated)**Formal EIA Screening Request: Residential-led Redevelopment Proposal at Crone Court, Craik Court and Zangwill House, together known as the 'CCZ' site, Phase 6, South Kilburn NW6**

On behalf of our client, the London Borough of Brent (Regeneration and Environment Department), we request that the Council provides a formal screening opinion to confirm whether there is a requirement for an Environmental Impact Assessment ('EIA') in respect of the proposed residential-led redevelopment on the above site. This request is made in pursuance of Regulation 6 of the Town and County Planning (Environmental Impact Assessment) Regulations 2017 (as updated) ('the Regulations').

To enable your consideration of this issue, we set out below the following information:-

- 1 Description of the site and its surroundings
- 2 Description of the proposed development
- 3 Review of the requirement for an EIA

Item 3 is dealt with by reference to a preliminary review of the site and its surroundings and a consideration of the issues set out in the EIA Regulations which take into account recent case law.

In summary we consider that the proposed development will not give rise to a need for EIA. We outline below the analysis undertaken to reach this conclusion.

1. Description of the site and its surroundings

The CCZ site is located within the South Kilburn Estate which is in the south-east of the London Borough of Brent (LBB) and comprises an area of 0.97ha. It forms part of the South Kilburn Masterplan area and comprises part of Phase 6 of the South Kilburn Regeneration Programme. The site is bound by Denmark Road and Woodhouse Urban Park to the north; Carlton Vale to the south; Rupert Road to the west; and Neville Close and the Oxford-Kilburn ("OK") Club to the east. More widely, the site sits between Kilburn to the east; Queen's Park to the north-west and Maida Vale to the south.

The site is currently occupied by three existing buildings including:

- 1 Crone Court – a 12 storey block containing 85 dwellings;

- 2 Zangwill House – a four storey block containing 10 dwellings; and
- 3 Craik Court – a 12 storey block containing 72 dwellings.

The existing buildings are not listed or locally listed, and the site is not within a Conservation Area. There are no listed buildings in the vicinity of the site, and it does not fall within any local views or protected vistas.

The site is highly accessible via a range of public transport options and has a PTAL rating of 5 (Very Good). Queen's Park Underground and National Rail Station is 300m to the northwest of the site and Kilburn Park Underground Station is 500m to the east of the site. There are a number of bus stops in close vicinity to the site (bus route numbers 16, 31, 32, 98, 189, 206, 316, 328, 332) with services to the West End, Camden Town, Kensington, Golders Green, Edgware and Harlesden respectively.

The site currently has approximately 51 off-street carparking spaces (including two disabled spaces) alongside a further 23 car spaces on adjoining roads (including one disabled space).

The site is within an Air Quality Management Area (AQMA) and lies within Flood Zone 1 (low risk).

The site does not include any statutory designations for nature conservations. The site is to the south of Woodhouse Urban Park which is a designated as Open Space within Brent's Local Plan.

The site is designated within the Brent's Core Strategy (2010) as part of the South Kilburn Regeneration Area. Within the South Kilburn Supplementary Planning Document (2017), the site is covered by two site allocations: (1) Crone and Zangwill which sets an indicative development capacity for 145 dwellings; and (2) Craik which sets an indicative development capacity for 120 dwellings with potential for commercial space fronting Carlton Vale.

A site location plan is provided at Appendix 1.

2. Description of the proposed development

The development of the CCZ site comprises the redevelopment of the existing buildings to provide 252 homes (Use Class C3) in three new buildings, with approximately 334sqm GIA non-residential floorspace (Use Class E) and enhanced public realm. The proposed buildings are detailed below:

- 1 Block A – a perimeter block type building ranging from six to ten storeys in height will provide approximately 104 homes for affordable rent.
- 2 Block B – 16 storeys in height and will provide 85 homes for private sale with an element of Class E floorspace at ground level.
- 3 Block C – 12 storeys in height and will provide 63 homes for private sale with an element of Class E floorspace at ground level.

The proposed scheme will result in an uplift of approximately 79 homes compared to the existing situation.

It is proposed that the development will be generally car-free. Residents moving into the affordable homes as part of the decant strategy may not be able to keep their parking permits if they currently have one, and may be able to utilise on-street parking spaces. The development will provide 10% disabled car parking spaces, with 3% provided from the outset and the remaining 7% provision will be safeguarded and converted to accessible parking if demand arises. Cycle parking facilities will be provided in accordance with the London Plan (2021) standards.

The landscaping proposals include an internal shared courtyard garden provided within Block A, with seating and vegetation. Landscaping to Blocks B and C will wrap around the buildings providing communal

garden space. Each block is proposed to include a roof terrace with high parapets to reduce wind exposure to seating areas.

Energy reduction is proposed through passive and active energy efficiency measures, for example MVHR ventilation, LED lighting and improved fabric specification beyond Building Regulations. The scheme will prioritise connection to the planned South Kilburn District Heating System.

Construction will be undertaken using best practice measures and within standard working hours, and a Construction Environmental Management Plan ('CEMP') will be prepared (pursuant to planning condition) to ensure the implementation of measures to reduce any significant adverse effects during the construction process.

A detailed planning application will be submitted in respect of the above development. This will be accompanied by a series of technical reports as detailed at the end of this letter.

3. Requirement for EIA

The development is one to which the EIA Regulations may apply because it falls within Part 10(b) of Schedule 2 as an urban development project where the development includes more than 150 dwellings. For Schedule 2 developments, the Regulations require that an EIA be undertaken where "*the development is likely to have significant effects on the environment by virtue of factors such as its nature, size or location*".

In determining whether the development is likely to give rise to significant environmental effects, reference should be made to Schedule 3 of the Regulations. This identifies three categories of criteria:-

- 1 Characteristics of the development (such as size, cumulative effects, use of natural resources, production of waste, pollution and nuisances, risk of accidents and risk to human health)
- 2 Location of the development (by reference to the environmental sensitivity of the area)
- 3 Characteristics of the potential impact (having regard in particular to the extent of the impact, its transfrontier nature, magnitude and complexity, probability and duration, frequency and reversibility)

We consider below each of the relevant criteria specified in Schedule 3 of the EIA Regulations in turn below.

In this case, it should be noted that there are no EU environmental assessments which are relevant to the proposed development.

Development Characteristics:

The development will comprise the erection of three new residential buildings, ranging from 6 to 16 storeys within the previously developed CCZ site, South Kilburn. Massing has been designed within the context of the wider South Kilburn masterplan and other phases of the regeneration project.

The development will result in an uplift of 79 homes on the site, but will not change the overall use and character of the site or immediate vicinity. The percentage of family homes will be increasing from 6% to 34% (calculated by habitable rooms), and the density will increase from 178 dwellings per hectare to 260 dwellings per hectare.

The site falls within the South Kilburn Growth Area which is intended for 'regeneration development' that will substantially transform the area into a sustainable mixed used neighbourhood. The area forms part of the South Kilburn Masterplan which has now been incorporated into the South Kilburn Supplementary Planning Document (July 2017). This document sets a target of 3,492 new homes to be provided within South Kilburn in the period 2007-2029, including 1,200 affordable replacement homes.

The proposed development will generate waste during the operation and construction periods, however this is not expected to be at a level that will give rise to significant adverse impacts on the environment. Recycling will be a priority and all homes will be provided with refuse, recycling and food waste bins.

The development is also not considered to give rise to any unusual or significant effects either in themselves or in cumulative with other schemes nearby that would give rise to a need for EIA. The phasing of the development has been considered carefully within the masterplan for the wider South Kilburn redevelopment site, which was subject to extensive review and consultation.

The development is not considered likely to give rise to the potential for risks from accidents, pollution and nuisances or the significant use of natural resources giving rise to a need for an EIA. During the construction of the site good practice measures will be observed.

Whilst the proposed scheme will have an important regeneration benefit for the wider area, it is considered that the scheme (in its scale, design and uses) is of local importance and would not give rise to significant effects requiring an EIA.

In summary, it is considered that the development characteristics of the site are unlikely to give rise to the need for an EIA.

Environmentally Sensitive Location

The development site is not in, or partly in, a 'sensitive area' as defined by Regulation 2 (1) of the EIA Regulations. Whilst there are listed buildings within the vicinity, the relationship of these to the site do not mean that the area is particularly sensitive to the extent that significant effects are more likely. The development will not therefore give rise to significant environmental effects requiring assessment in relation to any environmentally sensitive locations or other statutory or non-statutory designated areas.

Environmental Effects

Transport

As outlined earlier, the site is highly accessible via a range of public transport options and has a PTAL rating of 5 (Very Good) and the development is proposed to be virtually car free (except 8 blue badge and 9 regular car parking spaces). The development will provide cycle parking capacity in line with London Plan (2021) requirements, within large ground floor communal stores, in secure circulation spaces close to the home, or within in-home bicycle stores.

The uplift in residential units is likely to result in an increase in transport activity to and from the site and it is possible that the travel patterns will change due to the changes in unit sizes and notably the increase in proportion of family homes. However, the site is close to good public transport facilities (approximately a 7 minute walk to Kilburn Park Underground Station and a 6 minute walk to Queens Park Overground Station), and there is a large number of local services accessible within walking distance of the site (where a suitable walking distance is considered to be 20 minutes), including shops, community facilities, parks, doctors surgeries. Bus stops are located within walking distance along Carlton Road to the south and Salusbury Road to the west, providing access to regular public transport services across London.

The surrounding road network provides continuous pedestrian footways, and the site is in proximity to established cycle network routes – Quietway 16 and Quietway 6.

Given the lack of change to the primary use of the site, the accessibility of the site, the existing transport infrastructure and the information given above, it is considered that the proposals will not have significant environmental impacts on transport which will give rise to the need for EIA.

Air Quality

The site lies within an AQMA declared by the Council due to annual targets for Nitrogen Dioxide (NO₂) not being met across the borough. The AQMA covers the majority of the borough except for a few areas to the north.

The site is located within close proximity to a number of main roads and a railway line. However, given the proposed nominal amount of car parking (8 blue badge and 9 regular car parking spaces), it is considered that the existing air quality conditions are unlikely to be affected as a result of transportation from the proposed development. In terms of energy production, it is planned to connect to the South Kilburn District Heating System and maximise solar PV on roof spaces for further carbon reductions.

Given the above, in relation to air quality, the proposed development is not likely to give rise to the need for EIA.

Noise

The site is currently occupied by residential buildings and is within a densely built up area of inner London in the south of Brent, where noise is generated by the main roads and railway lines surrounding the site. As such the site is not considered to have a low or sensitive baseline noise level. During construction, there will be some noise impacts, however these would all be short term, intermittent effects.

Given the above, it is considered that there are unlikely to be any significant effects arising in relation to noise and vibration which will give rise to the need for EIA.

Townscape and Visual Impact

The proposals include the erection of three residential buildings, the tallest of which will be the 16 storey element within the south of the application site, adjacent to Carlton Vale (the B413).

The emerging character of the area around the site is as a high density residential area. The surrounding area is not a sensitive or unified area of townscape, and the existing site currently has a negative impact on the area's character. Redevelopment with the proposed high quality buildings presents an opportunity to consolidate and enhance the area's townscape character.

The site is not located within a sensitive area in relation to townscape impacts, and as such, it is considered that the proposals will not have significant environmental effects on townscape and visual amenity which will give rise to the need for EIA.

Daylight, Sunlight and Overshadowing

The proposed development will increase the massing on the site from the existing which will accordingly create some overshadowing to the immediate surroundings. However, the site is an 'island' site, bound on all sides by roads, therefore the distance between this development and any nearby sensitive receptors is such that it is not considered to be at risk of generating any significant adverse impacts in relation to daylight, sunlight or overshadowing.

Given the above, it is considered that there are unlikely to be any significant effects arising on daylight, sunlight and overshadowing which will give rise to the need for EIA.

Wind and Microclimate

A preliminary wind and microclimate assessment has been undertaken to inform pre-application discussions. This assessed the ground floor plan and roof plan of the scheme to ascertain comfort levels for

future users of the site. The review concluded that there will be no uncomfortable areas within the site, and the majority of areas will be suitable for frequent sitting, occasional sitting or standing.

As described above, landscaping has been designed into the proposals which will further increase the level of comfort within dedicated sitting areas for future users.

Given the above, it is not considered that the proposed development will generate significant environmental impacts in relation to wind and microclimate that would give rise to the need for EIA.

Socio-Economic

The proposals include the re-provision of the existing housing units for existing residents on the estate as well as providing additional residential units. The increase in residential units is likely to result in a small increased demand for services. The provision of Class E floorspace will generate opportunities for local employment within the site, and temporary employment opportunities throughout the construction period. As such, there is likely to be some small scale effects in relation to socio-economics, however these are considered to be local level and are not of significance giving rise to a need for EIA.

Water Environment

As identified earlier in this letter the site is located within Flood Zone 1 with a low risk of flooding. The scheme will include a sustainable drainage scheme to ensure that flood risk on site does not increase following the construction of the proposed development. It is not considered that a significant effect on the water environment will arise in respect of the scheme, and therefore the proposed development is not likely to give rise to the need for EIA.

Above and Below Ground Heritage

The site does not contain any listed or locally listed buildings and is not within a Conservation Area. There are no listed buildings within the vicinity of the site and there are no conservation areas adjoining the site. The listed buildings located to the west of the site are separated by existing residential buildings and roads. The proposals also include landscaping proposals, tree planting and mature tree retention.

The site is not located within an Archaeological Priority Area and there are no known remains of potential interest within the development site boundary.

Based on information available to the team at this time, and the existing urban context within the wider regeneration site, it is not considered that there is potential for significant effects in relation to above or below ground heritage which would give rise to a need for EIA.

Ecology

The site is not located within a designated or non-designated ecological area. Although there are a number of ecological designations located in the wider surrounding area, these are separated from the site by an established urban setting.

In this context, and given the size of the proposed development, it is not considered that the proposed development will give rise to ecological impacts that would require assessment as part of an EIA.

Planning Submission

Notwithstanding your consideration of the requirement for EIA in connection with the proposed development, additional material will accompany the application to assist in your consideration of the proposals. The material is expected to comprise:-

- 1 Site location plan and application drawings (including existing and proposed elevations, floor plans, roof plans and sections, demolition plans);
- 2 Application forms and Certificates;
- 3 CIL Additional Information Form;
- 4 Planning Statement (including existing/proposed accommodation schedule and draft Heads of Terms);
- 5 Landscaping Strategy and Plans;
- 6 Design and Access Statement;
- 7 Affordable Housing Statement;
- 8 Energy/Sustainability Statement;
- 9 Daylight/Sunlight/Overshadowing Assessment;
- 10 Transport Statement and Travel Plan;
- 11 Drainage Strategy;
- 12 Fire Strategy
- 13 Statement of Community Involvement; and
- 14 Wind Microclimate Assessment.

Conclusion

We trust that you have sufficient information to determine whether this is an EIA development under the Town and County Planning (Environmental Impact Assessment) Regulations 2017 (as updated). From these Regulations, we note that the local authority has three weeks (beginning from the date of receipt) to form a screening opinion and to provide the main reasons for this opinion having regard to the relevant criteria listed in Schedule 3. If adopting a negative screening opinion, we note that the LPA must also state any features of the proposed development and measures envisaged to avoid and prevent what might have otherwise been, significant adverse effects on the environment.

Please contact me or my colleague Alan Hughes if you have any questions.

Yours faithfully



James Burman
Planner

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Marie Frederick, LB Brent Regeneration and Environment