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1st July 2021

Dear Sir / Madam,

**Environmental Impact Assessment Screening Opinion Town and Country Planning
(Environmental Impact Assessment) Regulations 2017**

Proposal: Request for Screening Opinion as to whether an Environmental Impact Assessment is required for a proposed 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.

Site: Crone Court, Craik Court and Zangwill House, together known as the 'CCZ' site, Phase 6, South Kilburn NW6.

I write in connection to your screening request submitted on 8th June 2021 by Lichfields on behalf of the London Borough of Brent (Regeneration and Environment Department). Reference has been made to Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ("the EIA Regulations") "Requests for screening opinions of the relevant planning authority".

Upon review of the material supplied in association with the screening request from the applicant, plus other material that is mentioned in association with this screening opinion, the London Borough of Brent considers that the proposed development is not EIA development. As such it will not require an EIA to be undertaken to accompany any planning application for development described that incorporates the proposed mitigation measures to address potential adverse effects of the development as set out in this screening opinion.

As required by Regulation 6(6) of the EIA Regulations please find attached the Council's Statement of Reasons which provides full reasons for this conclusion.

If you require any further assistance, please do not hesitate to contact Paul Lewin, on telephone 020 7937 6710 or email paul.lewin@brent.gov.uk.

Yours sincerely,

Paul Lewin
Team Leader Planning Policy

EIA SCREENING OPINION STATEMENT OF REASONS
The Town and Country Planning (Environmental Impact Assessment) Regulations
2017

Description of proposed development – Request for Screening Opinion as to whether an Environmental Impact Assessment is required for the proposed 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.

Site – Crone Court, Craik Court and Zangwill House, together known as the ‘CCZ’ site, Phase 6, South Kilburn NW6.

Notes - The assessment of the proposed development’s likely significant effects is in relation to the EIA Regulations only. The assessment does not imply any consideration of the planning merits of the proposals or indicate the likely success or otherwise of an application for planning permission.

Introduction

Lichfields, on behalf of the London Borough of Brent (Regeneration and Environment Department), have requested a screening opinion from the London Borough of Brent (the Council) on 8th June 2021. Associated with this request details of the site boundary, proposed development and an initial assessment of the potential impacts of the proposed development were submitted to support the request.

The Existing Site and Surrounding Area

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 car parking 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 fluvial Flood Zone 1 (low risk), with a small part in surface water Flood Zone 3. The site does not include any statutory designations for nature conservations. The site is to the south of Woodhouse Urban Park which is 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 guidance for two development sites: (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.

The Size and Design 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. Disabled parking and cycle parking facilities will be provided in accordance with the London Plan(2021) standards.

Energy reduction is proposed through passive and active energy efficiency measures and 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.

Information Provided in Support of the Request for a Screening Opinion

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.

Previous History

The site has a long history of residential use, being first developed in the late 19th century, with maps from the 1890s outlining the terrace properties. By the 1970s redevelopment saw the street network removed and developed into the current buildings, Crone Court, Craik Court and Zangwill House.

The history of the site and proposed redevelopment of the area is documented on the website 'New Homes for South Kilburn' at www.southkilburnccz.co.uk.

Large Scale Development within the Vicinity

Within the vicinity there are currently the following applications for significant developments which have not yet commenced/ been completed to take account of when assessing the impact of the cumulative impact of the proposed development subject of this screening opinion in association with other developments:

19/3259 Full planning application for a phased development for the demolition of 2 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 private sale residential units (Use Class C3), shared ownership residential units (Use Class C3), social rented residential units (Use Class C3); new health centre (Use Class D1), new gym (Use Class D2), flexible use class within retail and commercial units (Use Class A1/A3/B1) 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 and subject to a Deed of Agreement dated 15/02/2021 under Section 106 of the Town and Country Planning Act 1990, as amended. Granted 15th February 2021. Associated ref. 16/4174. Under construction.

High Speed Rail (London – West Midlands) Act 2017 – Approved 23rd February 2017. Construction of Phase One of High Speed 2, a high-speed railway between London and Birmingham. Construction of a Vent Shaft and Auto-Transformer Station, Canterbury Works Site, Canterbury Road NW6 5ST. 21/0686 Under construction:
<https://hs2inkilburnandnortholt.commonplace.is/proposals/works-in-your-area>

16/1191 - Demolition of existing buildings at 5-9 Chippenham Gardens, Kilburn Park Post Office and 4-26 Stuart Road (even numbers) and construction of part-four, -five and -six storey building comprising 52 self contained flats (24 x 1 bed, 19 x 2 bed and 9 x 3 bed) with associated highway works, hard and soft landscaping, cycle and refuse provision and alterations to Chippenham Gardens. Granted 5th August 2016. Under construction.

14/1896 - Gloucester and Durham - Demolition of 209 existing dwellings and garages at Gloucester House and Durham Court and erection of 4-8 storey blocks comprising of 236 flats (134 private and 102 affordable (social rent)), an energy centre for the South Kilburn Neighbourhood Decentralised Heating System, basement car-park, associated landscaping

and general amenity space. Works in progress. Phase 3b - Hereford House and Exeter Court - a scheme including 247 new homes, a new high quality local park, and retail space has been developed. Due to be submitted to planning later in 2021.

<https://www.brent.gov.uk/your-community/regeneration/south-kilburn-regeneration/the-development-process/hereford-house-and-exeter-court/>

12/0788 - Demolition of Keniston Press, Premier House, Cullen House and the Falcon public house and redevelopment of 137 flats (39 affordable), along with new public space, 1270 square metres of commercial space (Use classes A1/A3/A4) and 959 square metres of office space (Use class B1a for dedicated use by TfL) within a part 4, part 5, part 6, part 8 and part 9 storey building. Works in progress.

Other Environmental Assessments

Regulation 5(5)(b) of the EIA Regulations requires the relevant planning authority to take into account the results of any relevant EU environmental assessments.

Current Local Plan

The current Brent Local Plan consists of the Core Strategy (2010), Site Specific Allocations (2011), Wembley Area Action Plan (2015) and Development Management Policies (2016) Local Plans and the West London Waste Plan (2015). Together these documents provide spatial policies, development management policies and site allocations to guide and manage development in the borough.

Sustainability Appraisals (SA) for all these Local Plan documents were undertaken. The SAs satisfied the requirements of the EC Directive 2001/42/EC and Strategic Environmental Assessment (SEA) Regulations on the assessment of the effects of certain plans and programmes on the environment.

These documents have been referred to when generating the EIA Screening Opinion.

Local Plan to 2041

The Council submitted its draft Brent Local Plan for examination to the Secretary of State on the 17th March 2020, following Full Council approval on the 19th February 2020. Examination hearings took place between the 29th September 2020 and 16th October 2020. Once adopted, this document will be the key strategic document to guide and manage development in the borough until 2041. An Integrated Impact Assessment (IIA) accompanies the new Local Plan, which incorporates the SA and SEA – that consider the potential for significant economic, social and environmental effects. This document has been considered when generating the EIA Screening Opinion.

Legislation

The proposed development does not fall within any of the descriptions of development listed in Schedule 1 of the EIA Regulations, and is therefore not a 'Schedule 1 development'. The development does, however, fall within the description of a Schedule 2 development, classified under item 10 (b) as 'urban development projects'.

'Schedule 2 development' means development (other than exempt development – which this is not) 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.

No part of the proposed development is to be carried out in a 'sensitive area' as defined by the EIA Regulations.

The threshold for item 10(b) is as follows:

- (i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or
- (ii) the development includes more than 150 dwellings; or
- (iii) the overall area of the development exceeds 5 hectares.

The proposed development is for 252 homes (Use Class C3) in three new buildings, with approximately 334sqm GIA non-residential floorspace (Use Class E) and enhanced public realm. This proposal therefore falls below the indicative criteria and screening threshold at less than 5ha in area, but exceeds the threshold at more than 150 dwellings.

Consideration must therefore be given to whether the proposed development may give rise to significant environmental effects, such that an EIA may be required.

Likely Significant Effects

The ultimate stage in the screening process is to consider whether it is '*likely to have significant effects on the environment by virtue of factors such as nature, size or location*'. As required by regulation 5(4)(c), where a relevant planning authority has to decide whether Schedule 2 development is EIA development, they must take into account the selection criteria set out in Schedule 3 as are relevant to the development.

The Council has taken into account the selection criteria set out in Schedule 3, where relevant to the proposed development. This includes the characteristics of the development, the environmental sensitivity of geographic Regulation 5(5)(b) of the EIA Regulations requires the relevant planning authority to take into account the results of any relevant EU environmental assessments.

In addition, as required by regulation 5(5)(a), where the relevant planning authority adopts an EIA Screening Opinion they must state the main reasons for their conclusion with reference to the relevant criteria listed in Schedule 3. Within this Statement of Reasons, the Council has stated the main reasons for their conclusion, referencing the relevant criteria listed in Schedule 3 as appropriate.

The Council has concluded that the proposed development does not require an EIA to be undertaken to accompany a planning application for the proposed development as the proposed development is not likely to generate significant environmental effects – Appendix A (below) sets out the reasoning for this decision.

Appendix A – Consideration of Likely Significant Effects

Air Quality

The site is located within the Brent Air Quality Management Area (AQMA). The majority of Brent has been designated as an AQMA, and therefore even small increases in emissions can lead to adverse effects. The AQMA has been declared for exceedance of the annual mean national objective for nitrogen dioxide (NO₂) and the 24 hour mean national objective for particulate matter (PM₁₀).

There are a number of sensitive receptors in close proximity to the proposed development site, including the residential properties, schools and businesses.

Documentation Accompanying the Planning Application: *A Transport Statement and Travel Plan will accompany a planning application submission.* : It is anticipated that an Air Quality Assessment will be submitted with the application.

Construction

Machinery used during construction can generate new sources of emissions, as well as traffic movements to/from the site and the works themselves. When assessing the effect of dust emissions generated during construction works, receptors are defined as the nearest potentially sensitive receptor to the boundary of the site in each direction. These receptors have the potential to experience effects of greater magnitude due to emissions of particulate matter generated by the works, when compared with more distant receptors.

The receptors in close proximity to the site, combined with the new emissions, means that there is the potential for adverse effects as a result of the construction proposed development.

Whilst there is the potential for adverse effects, with the implementation of standard best practice measures, it is not anticipated that the effects would be significant. Taking account of these practices the effect of dust soiling and PM₁₀ is likely to be reduced to negligible with the implementation of appropriate mitigation measures. These may include: No idling vehicles; Erect solid screens or barriers around dusty activities or the Site's boundary; Loads entering and exiting the Site are covered; Where practicable use mains or battery powered generators over fuel burning; Other dust suppression measures e.g. damping down with water; and all constructions vehicles and equipment to comply with relevant EU stage ratings. These standard mitigation measures can be implemented through a construction environmental management plan (CEMP), which can be secured through a standard planning condition.

As such, whilst there is the potential for adverse effects as a result of the proposed construction, with the implementation of standard mitigation measures, it is not anticipated that the effects would be significant and impacts are considered to be temporary.

Operation

Part of the site comprises hard-surfaced car-parking. Air quality emissions during operation will be from new traffic generation and heating systems. Supporting information states that the proposal is not anticipated to have any negative effect on Air Quality, taking into account the proposed low level of car parking and the proposed heating system. Due to the fact that the site is located within a Growth Area in the draft Brent Local Plan, the Council is likely to seek technical reports that show how an air quality positive development can be achieved.

The supporting statement advises that the level of car parking on the redeveloped site will be low and that 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. A transport statement and travel plan will also be provided to manage and mitigate travel associated with the 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. As such significant effects are not considered to be likely. Any building services plant / energy centre should be designed to minimise NOx emissions rates as recommended by the Mayor's Sustainable Design and Construction SPG. As such significant effects are not considered to be likely.

Mitigation

The Council is likely to seek at air quality positive development. During the construction phase a CEMP should be implemented which implements suitable measures to reduce the impact of dust and emissions. This can be secured via planning conditions.

The developer should consider the potential impact of air quality and dust on occupational exposure standards (to minimise worker exposure) and breaches of air quality objectives that may occur outside the site boundary. Continuous visual assessment of the site should be undertaken and a complaints log maintained in order determine the origin of a particular dust nuisance.

For the operational phase, suitable mitigation to be secured through a planning condition to ensure that new internal receptors are adequately protected.

Suitable conditions associated with the Transport Statement and Travel Plan and measures to reduce reliance on the private car, for example through provision of sufficient cycle parking and potential S106 contributions to implement a wider controlled parking zone will ensure reductions in impact through vehicle movements.

Local Heritage

Documentation Accompanying the Planning Application: The design and access statement will need to identify the extent of local heritage and cultural assets and how the design of the development has responded to these.

The Site does not lie within a Conservation Area or an Archaeological Priority Area. However the boundary of the South Kilburn conservation area is 150 metres from the site. This conservation area contains a significant number of listed buildings, essentially comprising all original terraces within Princess Road, Chichester Road, Cambridge Avenue and Oxford Road which are Grade 2. The same is true of properties within Cambridge Gardens, as well as Kilburn Park underground station. The Church of St Augustine Kilburn Park Road is Grade 1.

The site can be considered to have a generally low archaeological potential for all past periods of human activity. Past post depositional impacts are considered severe as a result of previous development. On the basis of the available information no further archaeological mitigation measures are recommended in this particular instance.

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. Many of the local buildings were constructed in the nineteenth century and offer a wealth of examples of Victorian architectural design, features which the South Kilburn Regeneration Masterplan aims to celebrate and treat sensitively in the redevelopment of the area.

The impact of the scale, height and form of the proposed buildings through the design and access statement/ heritage assessment which will allow sufficient clarity of impact on the setting of features of historic or cultural importance.

The Council considers that given the scale of the development and the urban nature of its location the proposed development would not lead to significant adverse environmental effects on heritage assets, as such EIA is not required in respect of heritage and cultural impacts.

Climatic Factors

Documentation Accompanying the Planning Application: An Energy/Sustainability Statement, Construction Environmental Management Plan should be submitted with the planning application.

Construction

Emissions from construction traffic and plant can contribute towards the region's greenhouse gas emissions. Due to the size of the proposed development the emissions are not considered to be substantial, and therefore no significant effects are anticipated. It is advised that sustainable methods of working should be implemented to reduce any emissions, and should be implemented as part of the CEMP.

Operation

It is considered that the proposed development will be able to achieve the necessary carbon reduction targets, through actual reductions combined with financial contributions. The effects of which are beneficial, but are not considered to be significant.

Mitigation

A CEMP should be secured that includes measures to reduce emissions e.g. management of plant to prevent plant running when not in use.

The s106 will need to be worded to ensure that any required carbon reduction off-set payments are secured.

Taking account of the above the Council does not consider that the environmental impacts related to climate change are significant enough to warrant EIA.

Contaminated Land

Documentation Accompanying the Planning Application

A Phase 1 ground conditions survey should be submitted with the application. This will assess the potential effects of the proposed development and if necessary the need for further ground investigations to support a remediation strategy report with mitigation measures to deal with any residual effects.

Parts of the site are within a historically industrial area and has been used for industrial purposes for some time. As such there is the potential for sources of contamination related to its and the surrounding land uses.

Construction

During construction there is considered to be a low likelihood of fuel leakages / spills from construction vehicles. A CEMP would be implemented to manage potential effects. In addition there is the risk of exposure to contaminated materials and opening up pathways to underlying substrata. Standard mitigation measures will be required during the construction of the proposed development, to ensure that the works are undertaken in an appropriate manner. These should be secured through conditions in agreement with the Council's Contaminated Land Officer.

With the implementation of these mitigation measures, no significant effects are considered likely.

Operation

With the implementation of any required impact avoidance measures as part of the construction phase, no significant effects are anticipated at operation.

Mitigation

Standard construction mitigation measures should be secured through the CEMP and if necessary through conditions in agreement with the Council's Contaminated Land Officer.

Taking into account the above the contamination issues are not so significant as to warrant an EIA.

Daylight, Sunlight and Overshadowing

Documentation Accompanying the Planning Application: *A Daylight and Sunlight Report will be submitted as part of the planning application process.*

There are a number of sensitive receptors in close proximity to the proposed development site, including residential properties, students and businesses.

Construction

During construction, there will be a change in the provision of daylight/sunlight due to the construction equipment (i.e. cranes) and the erection of the new buildings.

The construction equipment will be temporary and short-term, and therefore not considered to be significant.

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. The construction effects will however be no greater than the completed, operational development, which are not considered to be significant.

Operation

The operation of the proposed development will introduce buildings up to 16 storeys onto the site. Due to the proximity of nearby sensitive receptors and the height there is the potential for the proposed development to affect surrounding receptors. Some properties may be adversely affected by the proposed development, however given the number of receptors and the site's urban location, and the fact the development is replacing existing tall buildings, the effects are not considered to be significant.

Mitigation

No discipline specific mitigation has been relied upon for the EIA Screening Opinion.

Taking account of the above it is considered that the environmental impacts in relation to daylight, sunlight and overshadowing would not be so significant to warrant EIA.

Biodiversity (including flora and fauna)

Documentation Accompanying the Planning Application: A tree survey should be submitted in association with the application.

The site contains no areas of statutory nature conservation and there are no such site within the immediate vicinity of the Site. There are no SPA, SAC or Ramsar designations within 5km of the Site. There are two SSSI within 5km of the Site, namely Brent Reservoir SSSI and Hampstead Heath Woods. There are no LNRs within 1km of the site.

There are no environmental pathways such as water courses through which the Proposal could adversely affect these protected areas. It is not considered that the proposed development will have a significant effect on the integrity of statutory or non-statutory nature conservation designations or protected species and the potential for conservation requirements and objectives would not be diminished.

The development site appears to have limited on site ecological assets, essentially in terms of green infrastructure predominantly consisting some mature broadleaf and evergreen trees on its boundaries, and adjacent mature broadleaf street trees. These may provide nesting areas for common birds, it is considered that bat activity in the area is unlikely due to its urban nature and lack of proximity of mature woodland/ watercourses. As such it is recommended an Ecology Scoping Survey should be undertaken to identify on site ecology and whether further ecological assessments are required.

Construction

A range of standard mitigation measures may be required to reduce potential adverse impacts on biodiversity, such as timing of demolition/ construction activities, relocation of bats and controls on lighting.

Trees to be retained will need suitable root protection areas within which construction activities must not encroach. Given the very limited ecology on site, it is not considered that impacts will be significant.

Operation

There is the potential for the proposed development to beneficially contribute to biodiversity of the local area through the implementation of ecological enhancement measures e.g. inclusion of habitats for fauna, green roofs/ walls and a wider range of green infrastructure

on site that encourages bio-diversity. Whilst this is considered to be beneficial, this is not considered to be significant.

Mitigation

If ecology is on-site, suitable conditions should be in place to ensure potential adverse impacts on retained features are minimised during prior to and during works on site, as well as incorporation of suitable features to encourage bio-diversity resources as part of the development.

Taking account of the above no significant environmental effects should arise which would require the need for an EIA.

Flood Risk

Documentation Accompanying the Planning Application: *The site is located within fluvial Flood Zone 1, and is therefore considered to be at low risk to flooding from this source.* However a small part of the site is identified as Zone 3 for Surface Water flooding which will need to be addressed through a Flood Risk Assessment which will be sought.

Construction

As the site is not subject to fluvial flooding during the construction process there is considered to be limited risk to property and people. The development will be expected to take a sequential approach in locating buildings wherever possible away from flood zone 3, thus reducing the risk of flooding to property on site and reducing flood storage/ impacting on hydrology resulting in increased flooding elsewhere. Easy access to land outside flood zone 3 on site should allow construction personnel to move to areas away from flood risk.

Operation

The FRA will seek to ensure that the proposed development will not increase flood risk to occupants and off-site. This will include ensuring as little of the building footprint is located in Floodzone 3 as possible, and if it is putting less vulnerable uses in areas at higher risk and ensuring that the impacts on flood storage/ floodplain capacity are not adversely affected. In addition it is likely that the site will reduce surface water run-off to greenfield rates through a series of appropriate measures.

Mitigation

The development will be located and designed so not to increase risk of fluvial and surface water flooding. Implementation and management of surface water run-off should be secured through a planning condition in accordance with the requirements of the London Plan utilising sustainable drainage systems (SuDS).

Taking account of these matters it is considered that the development will not have significant effects that warrant the need for EIA.

Mitigation

Implementation and management of surface water run-off should be secured through a planning condition.

Taking account of these matters it is considered that the development will not have significant effects that warrant the need for EIA.

Human Health

It is considered that human health (both of existing and new receptors) has been appropriately considered within the relevant topic sections (e.g. water contamination or air pollution) and as such, reference should be made to these sections as required.

Land (land take)

The construction and operation of the proposed development will utilise brownfield land to provide commercial space and residential dwellings. This is not considered to generate any significant effects. No discipline specific mitigation has been relied upon for the EIA Screening Opinion.

Material Assets

The construction and operation of the proposed development will utilise material assets, but given the scale of the development this is not considered to be substantial. As such, significant effects are not considered to be likely. No discipline specific mitigation has been relied upon for the EIA Screening Opinion.

Major accidents and/or disasters

It is considered that the risk from major accidents and/or disasters (both of existing and new receptors) has been appropriately considered within the relevant topic sections (e.g. climate change, flood risk) and as such reference should be made to these sections as required.

Noise and Vibration

Documentation Accompanying the Planning Application: A Noise & Vibration Assessment and CEMP should be submitted with the planning application.

Construction

Machinery used during demolition/construction on site can generate new sources of noise, as well as construction traffic movements in the vicinity. The nearby receptors combined with the new noise emissions, means that there is the potential for adverse effects as a result of construction activities.

Given the scale of the development, standard impact avoidance measures can be implemented to reduce emissions from construction activities, which will be secured through the CEMP. In the context of traffic movements around the site, the level of construction vehicle movements will not be exceptional. No significant effects are therefore anticipated.

Operation

With the exception of disabled parking, limited general car parking will be provided as part of the development scheme. There are likely to be deliveries to residents and commercial properties as well as waste removal, but in an urban context the impacts will be limited. As such, there is not considered to be any significant effects from traffic noise.

The proposed commercial and residential use is not considered to be inherently noisy. Some noise may be generated from the operation of mechanical plant and building services, but plant noise emissions will be required to meet local policy requirements and British Standards. Adherence to these values will ensure that new and existing receptors are not adversely affected, and will ensure that there will be no significant effects.

There is the potential for new residents to be affected by adverse noise due to the site's location. The Noise Assessment will consider how new residents can be protected through the appropriate design of the proposed development. The proposed development can therefore be designed with consideration to the location of the development and the potential noise implications – secured through planning conditions.

No significant effects are therefore anticipated.

Mitigation

Adherence to the CEMP should be secured through a planning condition, the CEMP will include standard mitigation measures to reduce noise emissions. Plant noise should be controlled to local and national guidelines using a planning condition.

Suitable mitigation will be required to be included within the design of the proposed development to ensure that new internal receptors are adequately protected. This might be through specifications on glazing, acoustic trickle vents, air bricks or mechanical ventilators, in order to reduce noise ingress but provide adequate ventilation to the standards.

Taking account of these matters it is considered that the development will not have significant effects that warrant the need for EIA.

Socio-Economic (including population)

Construction

The proposed development would create benefits to local employment though providing temporary employment during construction. This is considered to be beneficial, but not significant.

Operation

The proposed development would create benefits to local employment though providing permanent employment once operational. 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. In addition approximately 1 in 12 people work from home, so the development will provide space for occupants to do this. The development will provide housing to meet the borough's identified needs, including affordable housing. This is considered beneficial but not significant.

The development will increase demand for local social infrastructure. Community Infrastructure Levy (CIL) payments will be sought to offset the effects of the development. These financial contributions will mitigate adverse effects, so that significant effects are unlikely.

Mitigation

Financial contributions through CIL will be sought to mitigate the effects of increased population/ users.

Taking account of these matters it is considered that the development will not have significant effects that warrant the need for EIA.

Soil (organic matter, erosion, compaction, sealing)

Construction

There is the potential for some loss of organic matter, erosion, compaction and sealing during the demolition/construction phase; however, given the scale of the development and the length of the demolition/construction phase, effects are not considered to be significant.

Operation

The operation of the completed development is not anticipated to affect organic matter, erosion, compaction and sealing. As such, significant effects are not considered to be likely.

Mitigation

The implementation of a CEMP during the construction phase will ensure that standard mitigation measures are implemented.

Telecommunications

The height of the taller buildings may impact on the quality of television reception in the near locality, but on the basis of information provided with other sites in the vicinity the impact is not to be significant.

It is considered that there is no known significant likelihood at this stage, of detrimental effects from or on telecommunications that would warrant the submission of an EIA.

Townscape and Visual Impact

Documentation Accompanying the Planning Application: A Townscape and Visual Impact Assessment should be submitted with the planning application.

Construction

The construction works are likely to require large cranes/ equipment, and therefore there is the potential for adverse effects on views and townscape. That said, given the relatively short term, temporary nature of the construction works and the scale of the development, effects are not considered likely to be significant. Supplementary mitigation can be implemented through the use of hoarding, to provide a physical/visual barrier to the works.

Operation

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.

Mitigation

During construction, ensure the erection and maintenance of hoarding. Design, height and massing to reduce potential for adverse impact.

Taking account of these matters it is considered that the development will not have significant environmental effects that warrant the need for EIA.

Traffic and Transport

Documentation Accompanying the Planning Application: *A Transport Statement and Travel Plan will be submitted with the planning application.*

The site has a PTAL rating of 5 (very good) and is close to good public transport facilities, including Kilburn Park Underground Station and Queens Park Overground Station. The proposed development will have limited parking.

Construction

There will be an increase in the number of vehicles accessing the site during the construction phase, however, given the scale of the development the anticipated numbers are not considered to be substantial. It is considered that any adverse effects can be mitigated through a construction logistics plan (CLP) (potentially included as part of the CEMP) to control transport movements.

With the implementation of standard mitigation measures, no significant effects are anticipated.

Operation

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. 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 Transport Assessment and Travel Plan will set out how travel would be managed to and from the site when operational, which is consistent with an approach agreed with the local highway authority. As limited on site car parking will be provided, operational traffic effects of the proposals are likely to be limited when placed within the context of the site's existing use. Increased numbers of movements related to deliveries could generate additional traffic over current levels. However, given the scale of the development, these effects are not considered to be significant. The limited on-site car parking and lack of residents' controlled parking zone in the area will mean that suitable controls on residents potential to own/ park

cars on site and in the vicinity will be expected, this is likely to include restrictions within property leases as well as financial payments towards a local parking permit scheme, which will help to mitigate any adverse effects. The transport statement and travel plan should identify the capacity on the local public transport network to accommodate any increase in journeys associated with the redevelopment.

Mitigation

A CLP should be secured that includes standard mitigation measures to control transport movements.

Suitable conditions associated with the Travel Plan will ensure reductions in impacts through vehicle movements, and ensure that alternative to car use are promoted. Controls on occupants and financial payments should be sought to offset operational effects.

As such no significant environment effects are anticipated to require EIA.

Waste

Documentation Accompanying the Planning Application: A CEMP will be sought as part of the planning process to deal with demolition and construction waste matters. A Waste Management Strategy or similar type of analysis of within the planning statement of how the development will adequately cater for the storage and collection of domestic and commercial waste during its operation will be sought.

Construction

The site will generate waste, principally building materials during the demolition and construction stages. The management of construction waste is covered by the Waste Duty of Care Legislation (2016), issued under section 34 of the Environmental Protection Act 1990. The implementation of standard impact avoidance measures will reduce waste from construction activities, which can be secured through the CEMP. No significant effects are therefore anticipated.

Operation

Separate solutions will be provided for both the commercial and residential elements of the development. The inclusion of suitable waste facilities for residents is covered under part H6 of the Building Regulations, and to ensure this, inclusion of separate facilities for general waste, recycling and organic materials is normally assessed for capacity and suitability as part of the normal planning process with reference to the 2015 Brent Council guidance. Commercial waste is covered under the same legislation as construction waste, above.

The decision notice should include suitable conditions to ensure that waste facilities for residents and businesses are provided prior to occupation. No significant effects are anticipated.

Mitigation

Adherence to the CEMP which will include standard mitigation measures should be secured through a planning condition for construction phase, as well as one that seeks to ensure sufficient space and practises to ensure adequate measures for waste management are in place prior to and during occupation.

Water Quality (hydromorphological changes, quantity and quality)

This matter will be addressed in a number of areas, Flood Risk Assessment/ drainage strategy, ground conditions survey and the CEMP that will be required as part of the application/ permission process.

The site is not adjacent to or near a watercourse that would allow informal pathways from flows off-site, water would access these through the surface water drainage network. In addition the site has historic industrial use with a small potential for various compounds that could adversely affect water quality such as hydrocarbons within the ground if disturbed.

Construction

During the construction process there is the potential to affect water quality through accidental pollution events, such as fuel spills and increased sediment within surface water passing through to adjacent watercourses. The implementation of standard impact avoidance measures should be secured through the CEMP. In addition the potential of contamination on site could result in pathways either above or below ground being created that lead to watercourses, for example through piled foundations. This will require measures to avoid such potential. With the implementation of standard impact avoidance measures to ensure that the site is adequately protected, no significant effects are anticipated. It is not considered, given the scale of the development and works proposed that there will be any significant effects on either water quantity or hydromorphology during construction.

Operation

There is the potential the operation of the proposed development to affect the foul and surface water capacity/ quantity due to an increased demand. Whilst there may be an increase in demand, given the scale of the development, it is not considered to lead to significant effects. There is the potential for pollutants originating from motor vehicles to enter the surface water and ground water systems. Such risk can be mitigated through the inclusion of pollution control measures in surface water drainage systems, which can be secured by condition. It is not considered, given the scale of the development and the implementation of SuDS (refer to Flood Risk section above) that there will be any significant effects on either water quality or hydromorphology once operational.

Mitigation

A CEMP should be secured that includes measures to protect against and deal with accidental pollution events. The Contaminated Land Report will identify if and where contamination is present and measures required to ensure that any construction activity does not increase risk to water quality will be secured through planning condition. The implementation and management of SuDS and associated pollution control mechanisms for surface drainage should be secured through a planning condition.

As such it is not anticipated that the environmental effects will be of such significance to warrant EIA

Wind

Documentation Accompanying the Planning Application: *A Wind/ Microclimate Assessment will accompany the planning application.*

Construction

It is recognised that throughout the demolition and construction phase of the project, the cranes and the erection of the new structure may affect the local wind microclimate, however these effects are considered to be temporary and not anticipated to be significant.

Operation

The operation of the proposed development will introduce new buildings onto the site that will be up to 16 storeys in height. On its own, or in combination with existing or proposed adjacent tall buildings therefore there may be adverse effects on the existing wind conditions. This can be assessed throughout the normal planning process taking account of the Wind Impact Assessment. Mitigation measures should be incorporated into the development to reduce the impacts on those within and adjacent to the development to acceptable levels.

As such it is not anticipated that the environmental effects will be of such significance to warrant EIA.

Cumulative Effects

The 2017 EIA Regulations requires the consideration of cumulative effects through interactions being the combined effects of individual effects arising as a result of the development and also with other existing development and/or approved development.

In relation to the cumulative effects of the interactions related to the proposed development, taking account of the analysis and commentary above it is not considered that the impacts are such as to be so significant to warrant EIA.

There are a number of major developments in the surrounding area that are likely to be built, as detailed in 'Large Scale Development within the Vicinity'. The proposal in association with these wider developments may have the potential for cumulative impacts. The impacts of this needs to be considered when determining if the effects would be so significant as to warrant EIA.

The Council has considered a wide area consisting of the South Kilburn masterplan area and other development sites adjacent or within the vicinity, particularly those that might generate transport movements. HS2 as a national infrastructure project was subject to an EIA. It identified in relation to the South Kilburn area, impacts would be greatest during construction compared to operation. Air quality and noise related to construction and operation were likely to be the impacted upon greatest. For air quality in construction the EIA identified the magnitude of impact in the locality around the vent shaft as slight adverse, with the effect of dust generating activities being not significant and no additional mitigation proposed. In relation to construction phase road traffic no significant impacts were identified in relation to NO₂ and PM₁₀ in the vicinity of South Kilburn.

Demolition/Construction

It is considered that no likely significant adverse cumulative construction effects will occur assuming the implementation of standard mitigation measures such as appropriate traffic management measures and construction routing; and maintenance of site hoardings and compliance with the mitigation measures detailed within the CEMP.

It is also assumed that the enabling works, demolition and construction phases associated with the other development schemes would adhere to legislative requirements, industry guidance and best practice as will be the case within the application sites. However, there

remains the potential for cumulative effects to arise, particularly with respect to dust and noise.

The construction workers at the construction site of each individual cumulative scheme will have to adopt controls to prevent the significant transfer of airborne pollutants beyond their site boundaries and the use of monitoring to confirm the effectiveness of these measures. Therefore, cumulative effects at existing and future receptor locations would be appropriately managed by the contractors to avoid the occurrence of significant adverse cumulative effects. Cumulative effects during the enabling works, demolition and construction phase are therefore generally considered to be temporary, local and overall not significant.

Operation

With regards to the matters considered in this opinion it is not considered that there will be significant adverse cumulative operational effects when the cumulative developments and the proposed development are operational. The limited on site provision of parking, will ensure the majority of sites will not generate greater numbers of vehicle trips than currently. Where it is anticipated that there will be additional trips than is the case currently, for example on the Northfields site, a range of local physical interventions are proposed to deal with capacity issues.

It is anticipated that CIL and S106 and other funding streams from Government and service providers will address capacity issues that might exist in relation to on and off-site infrastructure.