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29.04.2014

Dear Claire,

**Sarena House/ Grove Park/ Edgware Road (site reference B/C2 (part))  
EIA Screening Request**

I write on behalf of our client, Galliard Homes, to obtain your advice on the requirement for an Environmental Impact Assessment (EIA) for the redevelopment of Sarena House, off Grove Park, Colindale for 227 residential units, commercial units with associated car parking, amenity space, landscaping and access.

This request for a screening opinion is based on the requirements and methodology for seeking a formal screening opinion as detailed in the following documents:

- Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 ('the Regulations');
- The Planning Practice Guidance web portal; and
- EIA Guide to Procedure (November 2000).

The information contained within this letter is considered to be in accordance with Regulation 5 of the regulations, which states 'a request for a screening opinion shall be accompanied by:

- (a) a plan sufficient to identify the land;
- (b) a brief description of the nature and purpose of the development and of its possible effects on the environment; and
- (c) such other information or representations as the person making the request may wish to provide or make.'

The letter contains brief details of:

- the current site situation;
- the proposed development; and

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- EIA considerations including the development characteristics, location and potential impacts.

### **Current site situation**

The site is located in Colindale, in the London Borough of Brent, approximately 750m south west of Colindale tube station, approximately 2km north west of Hendon railway station and 60m from the A5 Edgware Road.

The site area as outlined equates to approximately to 1.1ha and has been in operation as a lawful industrial use until December 2013, when the former tenant, a kitchen manufacturer, vacated the site when their lease expired. Two to three storey warehouse buildings cover the majority of the site with offices fronting onto Grove Park. An area of hard standing along the west boundary was used as a parking area and informal storage.

There are no trees or hedges within the site. However, adjacent to its western boundary are vegetated private gardens which contain some large trees and shrubs. Although these are not within the ownership boundary, they do form part of the character of the area and as visual protection.

To the west of the site is a residential area characterised by two storey terraced houses on tree lined streets. On the northern side opposite the site is the Oriental City development site, which has planning permission (Ref: 12/2166) for a mixed use development. The proposal consists of 180 apartments, a school, a large supermarket and other communal elements. South of the site lies a moderately sized retail park and large car dealership.

### **Proposed development**

The proposal is a full planning application for the provision of 227 residential units, which include a mix of apartment units and family houses. Supporting commercial units (extending to approximately 300sqm) are also proposed along with associated car parking, amenity space, landscaping and access.

The proposal includes repositioning of existing vehicular access and new pedestrian accesses from Grove Park, including provision of a new undercroft car park.

The proposed scheme includes three storey buildings along the east and west boundaries which will link into the existing massing of the properties along Evelyn Road and Edgware Road and then rising incrementally to six storeys along its spine, which runs from north to south. Areas of informal green space and child's play space will be provided.

### **EIA requirements**

The Regulations set out the legislative framework for establishing the need for an EIA to be undertaken and submitted in the form of an Environmental Statement ('ES') with a

planning application. Regulation 5 sets out the process for identifying whether or not an EIA is required.

Under the EIA Regulations, it is considered that the proposed development falls within category 10 (b) of Schedule 2, 'urban development projects' and is above the size threshold of 0.5ha.

The screening criteria are set out in Schedule 3 of the Regulations. The criteria fall into three broad headings: characteristics of the development (e.g. size, use of natural resources, quantities of pollution and waste generated); location of the development, and characteristics of the potential impact (e.g. extent and magnitude of impact, probability of impact, duration, frequency and reversibility of the impact).

Circular 02/99 has now been archived with EIA guidance provided on the Planning Practice Guidance (PPG) web portal. "Annex: Indicative screening thresholds" now provides advice on considering the need for EIA and states that EIA 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. Physical scale, potential increase in traffic, emissions and noise are also relevant considerations.

The Annex also states that:

*"Development proposed for sites which have not previously been intensively developed are more likely to require EIA if:*

- i) The site area of the scheme is more than 5 hectares;*
- ii) It would provide a total of more than 10,000sqm 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)"*

#### **Characteristics of development and environmental sensitivity of development location**

The site area is approximately 1.1 ha which is above the 0.5 ha threshold referred to in Schedule 2, Section 10(b), and Column 2 of the EIA Regulations.

The proposed development is to increase the quantum of development of this sustainable brownfield site. The nature of the proposals i.e. primarily residential use, are considered appropriate due to the site location and surroundings and it is considered the development would not have significant 'urbanising' effects.

The site's location and proposal for residential accommodation is considered very sustainable due to its close proximity and excellent links to defined town centre areas, shopping facilities, local schools and other local facilities and amenities. In addition, the

site benefits from convenient access to good transport links and is in a good PTAL rated area (PTAL 4).

Further to previous discussions with the Council, the scale and massing has been carefully considered to respond positively to the site surroundings. Careful design consideration has been given to ensure visual and overlooking impacts are minimised.

The development of the site for a residential use is anticipated to result in an increase in municipal waste generation. However, it is considered that the site is located in a sustainable location and that it can be appropriately accessed by servicing vehicles. The proposal is considered to have no negative effect in terms of waste generation.

The site is not within an environmentally sensitive location, i.e. it is not within an area defined as a 'sensitive area' in regulation 2(1) of the EIA 1999 Regulations.

#### **Characteristics of the potential effects**

Whilst it is understood that there will be environmental impacts through the site preparation and construction phases, it is anticipated that these will be minor and of a temporary nature. Mitigation for likely impacts will be agreed in consultation with the local planning authority prior to the commencement of works.

It is recognised that there are potential environmental impacts associated with the proposed development; however, these are not considered to be complex or significantly hazardous. Potential impacts are identified as being associated with:

- Air quality and noise impacts through construction phase;
- Visual impact through construction phase;
- Contaminated land disturbance;
- Disturbance to habitat and ecological receptors off site;
- Pollution and an increase in surface water run-off;
- Creation of habitat and amenity space;
- Provision of new residential units to meet market and affordable housing needs;
- Creation of employment opportunities throughout construction activities;
- Increase in municipal waste generation;
- Increase in local population and impact on education and healthcare facilities; and
- Increased pressure on local highway network and public transport services.

The site is within a designated AQMA and as such specific consideration will be given to the use of heating and cooling systems to minimise release of pollutants. The system design will be carried out in consultation with the Council's Environmental Health officers to ensure appropriateness of the design. The development is not considered to have a significant impact trip generation from private cars due to the location within a high PTAL rated area and proximity to local facilities.

It is considered that the proposed development is compatible with existing surrounding land uses and is unlikely to give rise to potentially significant adverse environmental impacts.

#### **EIA screening advice**

This request for a Screening Opinion is being made in accordance with Regulation 5 of Part II of the EIA Regulations 2011. The applicant is of the opinion that due to the size, nature and location of the development proposals, the development is not EIA development, as the scheme is not anticipated to result in significant environmental effects.

It is also considered that the proposed development falls below the relevant thresholds for potential urbanising effects as set out in the PPG Annex relating to EIA.

If the proposal is deemed not to be EIA development, a number of environmental studies will nonetheless be carried out. These will ensure that social and environmental issues are included and assessed as part of the application process. It is anticipated that these studies will include:

- Plans to include location plan, site plan/block plan, existing and proposed elevations, existing and proposed floor plans and existing and proposed site sections and finished floor and site levels (at A1 and A3 scale) and CGIs of proposal;
- Design and Access Statement (including landscaping, fire and services strategy and external lighting);
- Planning Statement;
- Affordable Housing Statement;
- Flood Risk Assessment;
- Planning obligations – Draft Heads of Terms;
- Statement of Community Involvement;
- Sustainability document including an Energy Statement, BREEAM Assessment and completion of Brent’s Sustainability Checklist;
- Tree Survey/arboriculture implications;
- Details of basement construction in accordance with Brent’s Basement Practice Guide;
- Transport Assessment (including Delivery and Servicing Plan and Travel Plan);
- Desk Based Archaeological Assessment;
- Daylight and Sunlight Assessment.
- Biodiversity Report
- Contaminated Land Investigation (but this will need to be post demolition), you can submit the Phase 1 Desk Study as part of the application and a post demolition investigation can be conditioned
- Air Quality (that looks at the impact of construction on local air quality and makes recommendations; that also looks at the impact of AQ on future residents. If CHP

- proposed will need to be included – Council to set emission limits on these);
- Noise and Vibration;
  - Construction Management Plan (to minimise dust, noise, light pollution etc during construction).

I would be grateful if the Council could provide a Screening Opinion Within three weeks of receipt of this request in consistency with Regulation 5(5). If you would like any further information then please do not hesitate to contact me.

Yours sincerely



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