AVISON YOUNG

EIA Screening Report

Dudden Hill Lane, London Borough of Brent

July 2022

Contents

Appendices

Report title: EIA Screening Report
Prepared by:
Reviewed by:
Status: Final
Draft date: 7 July 2022

For and on behalf of Avison Young (UK) Limited

1. Introduction

1.1 Avison Young have been appointed by London Square Developments Ltd (the 'Applicant') to request an Environmental Impact Assessment (EIA) Screening Opinion in relation to a forthcoming planning application (the 'Application') submitted to the London Borough of Brent Council (LBB) for a development at 370 High Road and 54-68 Dudden Hill Lane (the 'Site').

1.2 This EIA Screening Report summarises the findings of the research and analysis undertaken by Avison Young and the assessment team in relation to the baseline conditions and the potential environmental effects of the Development. This report aims to determine whether there is a likelihood of significant environmental effects to enable an informed decision on the need for EIA to be made by LBB.

1.3 Provision for the request of an EIA Screening Opinion from LBB is made within Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)[1] subsequently referred to as the 'EIA Regulations', which states:

(1) "A person who is minded to carry out development may request the relevant planning authority to adopt a Screening Opinion.

(2) A person making a request for a screening opinion in relation to a development where an application for planning permission has been or is proposed to be submitted must provide the following:

(a) A plan sufficient to identify the land;

(b) A description of the development, including in particular:

(i) A description of the physical characteristics of the development and, where relevant, of demolition works;

(ii) A description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;

(c) A description of the aspects of the environment likely to be significantly affected by the development;

(d) To the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from:

[1] The Town and Country Planning (Environmental Impact Assessment) Regulations (England) (SI571/ 2017), DCLG, London

(i) The expected residues and emissions and the production of waste, where relevant;

(ii) The use of natural resources, in particular soil, land, water and biodiversity; and

(e) Such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment."

1.4 As required by the EIA Regulations, the request for a Screening Opinion is accompanied by a plan sufficient to identify the land, a description of the Proposed Development, a description of the aspects of the environment likely to be significantly affected by the development and a description of any likely significant effects of the Proposed Development on the environment. Additional information is provided in accordance with guidance presented in the Planning Practice Guidance[2] (PPG).

1.5 In relation to the obligations on LPAs, the EIA Regulations state within Regulation 6 that a Screening Opinion should be adopted within 3 weeks of receiving a request.

1.6 Regulation 5 (5) of the EIA Regulations states:

"Where a relevant planning authority adopts a screening opinion under regulation 6(6), or the Secretary of State makes a screening direction under regulation 7(5), the authority or the Secretary of State, as the case may be, must-

(a) State the main reasons for their conclusion with reference to the relevant criteria listed in Schedule 3;

(b) If it is determined that proposed development is not EIA development, state any features of the proposed development and measure envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment; and

(c) Send a copy of the opinion or direction to the person who proposes to carry out, or who has carried out, the development in question."

1.7 Accordingly, we request that LBB provides a Screening Opinion with details of the reason for its decision within three weeks of receipt of this report.

[2] Department for Communities and Local Government (2014) Planning Practice Guidance. Available at: http://planningguidance.planningportal.gov.uk

2. Background to the Site

The Site Context

2.1 The Site is located within the London Borough of Brent (LBB). The Site Location Plan is provided in Appendix 1.

2.2 The Site comprises 0.93 ha of existing industrial land, including a heavy plant hire business, storage facilities for haulage equipment and scaffolding and a MOT station/used car sales garage. The Site is bound by the A407 High Road and industrial units to the south, the rear of industrial units on the west side, Dudden Hill Lane to the north and the rear of properties fronting onto Colin Road to the east, though the site does have two areas of frontage on to Colin Road towards its southern end.

2.3 There are no Statutorily Listed or locally Listed buildings on the Site and the Site is not located within a conservation area.

2.4 The Site is located within a mixed residential and industrial context, forming part of a wider industrial estate surrounded by residential properties, although there are existing terraced residential properties located along Colin Road. The Site has a Public Transport Access Level (PTAL) score of 5 indicating very good access to public transport services. The Site is located entirely within Flood Zone 1.

2.5 The Site is accessed primarily from Dudden Hill Lane to the north-east and the High Road to the south-west. The area surrounding the site is primarily low rise with areas of medium rise residential development to the north with commercial and light industrial uses.

Surrounding Area

2.6 The Site is located within an area of mixed residential and commercial use:

To the north: Commercial properties including a tyre workshop, vehicle repair, tile shops and other smaller businesses with some vacant buildings.

To the east: Dudden Hill Lane, beyond which are predominantly terraced and apartment style residential properties of a variety of ages.

To the south: terraced residential properties and a Tyre Garage, beyond which is Colin Lane and further residential properties.

To the west: a range of industrial and commercial occupiers.

Accessibility

2.7 The Site is surrounded immediately by a pedestrian environment. The wider environment contains numerous pedestrian crossings with dropped kerbs and tactile paving, enabling sufficient access within the area.

2.8 There is a network of footways / cycleways within the area. The location of these footways / cycleways include:

- Colin Road;
- Along the A407 High Road, including an unnamed footpath to the north of the Site; and
- From the Dudden Hill Lane (A4088).

2.9 The above list of footway / cycleways is supplemented with a combination of informal crossings and Toucan crossings. The pedestrian infrastructure provides suitable connections between the Site and local residential areas.

2.10 As the Site is located in an Inner London Borough, there are no defined Public Rights of Way (PRoWs).

Public Transport Accessibility

2.11 The nearest bus stop to the Site is located on the A4088, directly adjacent to the east of the Site, the services of which are regular and easily accessible for locals.

2.12 The closest rail station to the Site is Dollis Hill Rail Station, which is approximately 220m northeast from the Site. The station is accessible by walking, cycling, or via the numerous services throughout the area. These services have a high daily frequency.

Planning History

2.13 Prior to the submission of planning application ref. 18/3498, the planning history for the Site is limited. Application ref. 18/3498, which was withdrawn from Committee in January 2021 pending refusal, was submitted in September 2018, and can be summarised as follows:

- Mixed-use development in buildings ranging in height from 6 to 10 storeys (plus basement);
- 245 residential units, including: 87 1-beds, 114 2-beds, 42 3-beds, and 2 4-beds;
- 65.3% affordable housing, including 29.4% London Affordable Rented (LAR) and 70.6% shared ownership (intermediate) tenure split;
- 1,037 sqm (GIA) of employment floorspace for light industrial (Class Egiii) use;

- 804 sqm (GIA) of employment floorspace for flexible dual use as light industrial (Class Egiii) and/or offices (Class Egi) use;
- 1,919 sqm (GIA) of floorspace of retail (Class Ea) use;
- 503 sqm (GIA) of floorspace for a nursery (Class Ef) use;
- 1,617 sqm (GIA) of floorspace for a gym (Class E(d)) use;
- 501 sqm (GIA) of commercial floorspace divided into 5 units for flexible retail (Class E), financial and professional services (Class Eci), restaurant/cafe (Class Eb), bar (Class Sui Generis), hot food takeaway (Sui Generis) and/or light industrial (Class Egiii) use; and
- 66 car parking spaces, 456 cycle spaces (plus 65 short stay spaces), plant equipment and landscaping.

Cumulative Schemes

2.14 The EIA Regulations and Planning Practice Guidance states that in judging whether the effects of a development are likely to be significant, local planning authorities should have regard to the possible cumulative effects with any approved development. Approved development within 1km of the Site was considered appropriate given the surrounding urban context and included those projects with:

- A resolution to grant planning permission;
- A valid planning permission and yet to start on-site; and
- A valid planning permission and under construction.

2.15 The following planning applications have been identified as being of sufficient scale and proximity to warrant consideration with the Development for the potential to result in significant cumulative effects. The identified planning applications (hereafter referred to as 'Cumulative Schemes') are presented in **Table 2.1**.

Table 2.1: Cumulative Schemes

No.	Planning Ref.	Description of Proposal	Known Status	Distance / Direction
1	19/2804	Chancel House Demolition of existing buildings and construction of a secondary school with sixth-form arranged in a 5 storey building incorporating a multi-use games area (MUGA) at roof level and incidental works to include landscaping, play-areas, means of enclosure, access and car and cycle parking and subject to a Deed of Agreement dated 21 May 2021 under Section 106 of the Town and Country Planning Act 1990, as amended	Granted 21st May 2021	430m northwest
2	20/0027/TELN	Chancel House Emergency notice: notification under the electronic communications code regulations 2003 to utilise permitted development rights to temporarily install a 27m high lattice tower supporting 6no. antennas and 2no. 0.3mm microwave dishes, to install 1no. cabinet within a heras fence	Granted 3rd July 2020	430m northwest
3	20/2350	20A Sapcote Trading Centre Roof extension to create third floor office space	Granted 6th October 2020	40m northwest
4	19/3740	25 Sapcote Trading Centre Partial demolition of existing building and construction of an upward extension to include creation of a partial mezzanine floor and addition of window to existing ground floor side elevation	Granted 27th August 2020	40m northwest
5	19/1923	38 Sapcote Trading Centre Erection of first floor extension	Granted 15th August 2019	40m northwest
6	19/0885	Land at 63 & 65 Dudden Hill Lane The demolition of existing building and redevelopment of the site to provide 9 residential units (3 x 3 bed , 5 x 2 bed, 1 x 1 bed) (Use Class C3) and 163 sqm of employment floorspace/affordable workspace (Use Class B1), together with associated landscaping and infrastructure works	Granted 30th May 2019	30m east

No.	Planning Ref.	Description of Proposal	Known Status	Distance / Direction
7	19/1095	39A-B, 41, 43-47 Dudden Hill Lane Demolition of existing buildings and erection of a part 4 storey, part 5 storey building with Learie Constantine community centre (Use Class D1) on ground floor and 26 self-contained flats above (12 x 1 Bed, 7 x 2 Bed and 7 x 3 bed), provision for balcony amenity, and associated landscaping	Granted 17th October 2019	160m northeast
8	19/0439	33-35 Dudden Hill Lane Construction of first floor extensions to the offices rear of the commercial premises at Nos. 33-35	Granted 25th September 2019	170m northeast
9	19/2688	19 Dudden Hill Lane Demolition of the existing two-storey building and structures associated with the adjacent recreational sites and construction of a part 4-storey and part 5-storey building comprising D1 use on the ground floor and 29 residential units from part-ground to 4th floors. Works to include creation of communal roof terraces at 4th floor level, mechanical plant room, 48 cycle parking spaces, waste storage and associated landscaping	Granted 23rd January 2020	120m southeast
10	21/2156	Bubbly Day Nursery, 247 High Road Demolition of existing building and erection of a 4-storey building comprising 7 residential flats (Use Class C3) and flexible community floorspace (Use Class E(e), E(f), F1, F2), including basement development, rooftop amenity space, cycle parking and waste/recycling storage	Granted 15th October 2021	290m southeast
11	18/3019	Land Rear of 37- 53 Strode Road Demolition of existing buildings and erection of 15 residential units (arranged in a three storey building and a terrace of 5 mews houses) with a commercial unit at ground floor, private and communal amenity space and associated refuse and cycle storage	Granted 10th December 2020	450m southeast

3. The Proposed Development

Description of Development

3.1 The full description of development to be stated on the Application, is anticipated to be as follows:

> *'Demolition of existing buildings and redevelopment to provide 5 mixed use blocks, comprising residential dwellings (Class C3); light industrial floorspace (Class E(g)(iii); retail floorspace (Class E(a)), and flexible commercial floorspace (Class E); associated vehicular access; car and cycle parking spaces; refuse storage; amenity space; substation and landscaping.'*

Use and Amount

3.2 In summary, the Development will comprise:

- 300 residential units, 1,932 sqm of industrial floorspace and 2,003 sqm of retail floorspace comprising a supermarket and café;
- A development ranging from three to eleven storeys in height, across seven blocks, with a newly created pedestrian street through the centre of the Scheme;
- The provision of 36% affordable housing by habitable room, at a 71/29 split in favour of Social Rented accommodation; and
- 9 accessible parking spaces for residential use (comprising 3% of the units proposed) and 32 general parking spaces for commercial use.

Scale

- Designed as seven separate blocks the Scheme provides building heights ranging from three stories at the lowest point to eleven stories at the highest point. The proposal incorporates a stepped design where the massing of the scheme reduces as the building height increases.

Layout

3.3 The Development will be a residentially led, mixed-use scheme with various ground floor uses, including light industrial floor space, commercial frontage in the form of a new food store and new areas of public realm. The layout, scale and appearance of the buildings are summarised below:

- A ground floor public realm;

- Commercial space to the north, including a supermarket and smaller units for café and gym that work. The commercial space will have active frontage on Dudden Hill, commercial parking spaces, a supermarket entrance along Dudden Hill Lane;
- Light industrial yard to the south-west of the site, with a shared industrial yard and active frontages on the High Road to the south of the site;
- Access to parking and servicing for a food store to the north; and
- A pedestrian route through the site.

3.4 Designed as seven separate blocks, the Scheme provides building heights ranging from three stories at the lowest point to eleven stories at the highest point. The proposal incorporates a stepped design where the massing of the Scheme reduces as the building height increases.

3.5 The proposals have been designed to set back height and massing from the existing residential properties on Colin Road, with Blocks at the southern and western boundaries limited in height to appropriately complete the existing building line. Height has been focused towards the south of the site, in response to the more urban context along High Road and is then stepped down to the north and Dudden Hill Lane. Further setbacks are then utilised to reduce the visual appearance of the proposals when seen in short and medium range views.

Phasing

3.6 All of the development is proposed to be built out at the same time so the development would not be phased in its delivery.

Appearance

3.7 The proposed structures will utilise materials which provide an appropriate design solution in terms of quality, colour and environmental requirements. The selection of external materials and cladding will enhance the building as a whole and be high quality, durable, economical and easily maintained over its lifetime.

Access and Car Parking

3.8 The site is accessed primarily from Dudden Hill Lane to the north-east and the High Road to the south-west. The area surrounding the site is primarily low to medium-rise residential development with commercial uses and light industrial uses.

Landscaping

3.9 The opportunity for ground level landscaping will be constrained by highway boundaries although it is anticipated that tree planting will be incorporated into the pedestrian footways around the site. All landscape areas and features will be managed and maintained in the long term.

Historic Land Uses

3.10 The Ground Conditions assessment associated with the withdrawn planning application (ref 2018/3498) gives a brief description of the historical land use which indicates that the Site has been in commercial use from 1864 to present day:

- The 1864-1880 historical maps shows parts of the site to be developed with a number of small structures associated to a large house (Mead House) and Duddenhill Farm. The land use appears to be a field with orchards and a number of unknown tanks are marked in the fields.
- By 1896, Mead House and Duddenhill Farm were still present; however a number of other small buildings were marked across the site along with four round structures. The tanks were no longer marked.
- By 1936, the site had been redeveloped with one large structure in the north similar to the current building and one large square building to the east along with Mead House and what appear to be small structures to the east (possible garages or storage units).
- On the 1946 aerial photograph, these appear to be commercial warehouse type units, and by 1955 these two large buildings are identified as a Baker and Depot. Colin Road Garage (the current MOT use) is now marked and Mead House has been demolished.
- The site remains in this configuration until 1978 when the land to the west is marked as a depot and the main central building has been extended to the south to adjoin the boundary with the adjacent residential houses. A sub-station is shown in the south-east of the site.
- By 1991 the buildings to the east and west had been cleared and the site comprise the central building and extension only along with a new building in the north east corner which is labelled 57-68 Dudden Hill Lane.
- The 1999 aerial photograph shows a main building in the centre of the site. Most of the smaller buildings are not shown anymore and the area appears to be used for general storage and haulage vehicles.
- The most recent aerial photograph available, dated 2016, shows two buildings attached to the south-east of the main building with a yard in the middle and another building in the south-western corner. The rest of the site appears to be used for storage and parking.

Summary

3.11 In summary, the proposals will be designed with due regard given to the technical assessments undertaken by the Applicant's project team and the Site's technical and operational constraints. The proposed development represents a high-quality scheme undertaken in line with best practice guidance.

4. EIA Screening Analysis

4.1 In assessing whether an EIA is required, we have followed the guidance published in Planning Practice Guidance, taking into account the requirements of Schedules 1, to 4 of the EIA Regulations. The analysis is presented below.

Is the Proposal Schedule 1 Development?

4.2 According to the EIA Regulations and guidance, the application is not of a type that would constitute Schedule 1 development.

Is the Proposal Schedule 2 Development?

4.3 The Development is categorised under Schedule 2, Class 10 'Infrastructure Project' Subsection (b) 'Urban development projects'. For such development, an EIA may be required if:

- The development includes more than 1 hectare of urban development which is not dwelling house development; or
- The development includes more than 150 dwellings; or
- The overall area of the development exceeds 5 hectares; or
- The development is located within a sensitive area as defined by the EIA Regulations.

4.4 The EIA Regulations define a sensitive area as a national or European designated natural conservation site, a National Park, a World Heritage site, a Scheduled Monument and an Area of Outstanding Natural Beauty. It is evident from the description of the Site and its setting that it is not located within a sensitive area as defined by the EIA Regulations.

4.5 Although not within a sensitive area, the Development exceeds the dwellings threshold and as such, it is categorised as 'Schedule 2' development. It is, therefore, necessary to consider the criteria as set out

in Schedule 3 of the EIA Regulations to determine whether there would be significant environmental effects as a result of the Development taking into account the criteria in Schedule 3 and the aspects of the environment identified in Schedule 4. A request for an EIA Screening Opinion is made on this basis.

Step 3 – Analysis of environmental considerations identified in the EIA Regulations

Transportation

Baseline Information

4.6 There is a network of footways / cycleways within the area providing a good level of pedestrian accessibility to the Site. The pedestrian infrastructure provides suitable connections between the Site and local residential areas.

4.7 The nearest bus stop to the Site is located on the A4088, directly adjacent to the east of the Site and provides access to the 226, 302 and N98 routes which have a 5 and 7.5 minute frequency. These provide services to Mill Hill and Golders Green. An additional three bus stops are located within 500m of the Site, with services to Brent Cross, Golders Green and Willesden, Bus Garage with a frequency of approximately every 10 minutes or less.

4.8 The closest rail station to the Site is Dollis Hill Rail Station, which is approximately 220m northeast from the Site. The station is accessible by walking, cycling, or via the numerous services throughout the area. These services are located on the Jubilee line, providing access to Northbound access to Stanmore/Wembley Park and Southbound access to Stratford. These services have a high daily frequency, with a frequency of approximately every 5-10 minutes. The Site is close to the A4088 and allows efficient access to the other major areas of London.

4.9 The site lies within Controlled parking Zone which controls parking between 8:30am and 6:30pm from Monday – Friday.

Demolition and Construction

4.10 Given the well-placed nature of the Site within the existing public transport and highway network, and the capacity present within these networks, the impact from the proposed development on public transport capacity will not be significant during the construction phase.

4.11 The A4088 and A407 are provide suitable access for construction vehicles and provide ready access to the A406 North Circular Road and the A5. As a result significant effects associated with construction traffic are not likely.

The Completed Development

4.12 As above, the Site is well-placed within the existing public transport and highway network, and the capacity present within these networks, the impact from the proposed development on public transport capacity will not be significant during the operational phase of development.

4.13 It is therefore anticipated that the good access to public transport and limited car parking provision would mean that despite an increase in people at the Site (residents and employees), private car trips associated with the Development would be limited. The number and frequency in services of bus services and existing rail services in the vicinity of the Site mean that it is unlikely that there would be significant effects on public transport capacity.

4.14 The Development is not anticipated to generate any significant transport and access effects.

Cumulative Scenario

4.15 Should the demolition and construction works overlap with the construction programmes of the Cumulative Schemes there may be a potential for cumulative construction traffic effects to occur. However, as for the Development, it is assumed the construction activities of the Cumulative Schemes will be effectively managed through their own Construction Logistics Plans (CLPs) and Construction Environment Management Plans (CEMPs). This will ensure minimal disruption to the surrounding road network. Once completed, the Cumulative Schemes would be located such that occupiers and visitors can be expected to walk, cycle and use public transport.

4.16 In the Cumulative Scenario, it is not anticipated that the Development would result in any significant adverse effects on the local highway network.

4.17 An EIA is not required on the basis of transport and access.

Air Quality

Baseline Information

4.18 Sensitive receptors to air quality impacts associated with construction dust and road traffic are listed below:

- College of North West London, c.110m north west;
- Willesden Cemetery, c.200m south;
- St. Andrew & St. Francis C of E Primary School, c.450m south east;
- Gladstone Park Primary School, c.530m north east;

- Happywood Dog Daycare Center, c.600m north;
- Roundwood Park, c.600m south;
- St. Francis of Assisi Church, c.600m north east;
- Gladstone Park, c.620m north;
- Liberal Jewish Cemetery Prayer Hall, c.750m south east;

4.19 The numerous residential properties in the surrounding area of the Site, as well as the sensitive receptors mentioned above, can be considered as receptors for air quality impacts in the longer term.

Demolition and Construction

4.20 A fully integrated CEMP will be utilised to outline measures to control and minimise the risk of adverse effects from construction activities to sensitive receptors. This will minimise traffic to sensitive roads and routes at appropriate times. The CEMP can be controlled by a standard condition attached to the planning permission in due course.

4.21 Overall, the air quality effects of the proposed development are not considered to be significant during construction.

The Completed Development

4.22 The Site is within the Brent Air Quality Management Area (AQMA), which includes the whole of the borough south of the North Circular was declared in 2006 as a result of exceedances in Nitrogen dioxide NO_2 and Particulate Matter PM_{10}. DEFRA Background Pollutant Concentrations for the grid square where the proposed development site is located indicate that baseline NO_2 values on average almost half of the 40µg/m^3 objective, at 24.46µg/m^3. Baseline PM_{10} values are on average less than half of the 40µg/m^3 objective, at 18.4µg/m^3.

4.23 Since the proposed development is likely to have only a small effect on traffic flows and the Air Quality Standards are not close to be exceeding at the Site it will be unlikely to give rise to a breach of the EU Limit Values and unlikely to lead to them being approached. It is therefore not likely that there will be a significant effect on air quality at and around the Site. As such, the air quality effects of the proposed development are not considered to be significant during operation.

Cumulative Scenario

4.24 Should demolition and construction works overlap with the construction programmes of the Cumulative Schemes there may be a potential for cumulative construction dust nuisance effects to occur. However, as for the Development, it is assumed the construction activities of the Cumulative

Schemes will be effectively managed by a CEMP. This will reduce disruption to the surrounding sensitive receptors so significant effects are less likely.

Noise

Baseline Information

4.25 Sensitive receptors to noise impacts are listed below:

- College of North West London, c.110m north west;
- Willesden Cemetery, c.200m south;
- St. Andrew & St. Francis C of E Primary School, c.450m south east;
- Gladstone Park Primary School, c.530m north east;
- Happywood Dog Daycare Center, c.600m north;
- Roundwood Park, c.600m south;
- St. Francis of Assisi Church, c.600m north east;
- Gladstone Park, c.620m north;
- Liberal Jewish Cemetery Prayer Hall, c.750m south east;

4.26 The numerous residential properties in the surrounding area of the Site, as well as the sensitive receptors mentioned above, can be considered as receptors for noise impacts in the longer term.

Demolition and Construction

4.27 During construction, there would likely be a short-term, temporary increase in noise levels as a result of construction plant, equipment and delivery vehicles. These temporary, short-term effects would be typical of any construction project and may lead to some localised disturbance to the neighbouring residential and commercial properties. The noise and vibration effects could be effectively managed through the compliance with legislative requirements via the implementation of environmental management control measures detailed within the CEMP.

4.28 The numerous residential properties in the surrounding area of the Site, as well as the sensitive receptors mentioned above, can be considered as receptors for noise impacts in the longer term.

4.29 It is assumed that there will be no driven piling and any piling will be by continuous flight auger (CFA) piling. Construction noise will be controlled through the CEMP which can be controlled through a standard condition. If necessary, acoustic fencing can be erected to provide additional mitigation for any particularly noisy activities to ensure noise levels are maintained at an appropriate level.

Completed Development

4.30 Acoustic mitigation would be designed into the Scheme such that operational noise is restricted though the nature of the uses proposed are not of a type that would be likely to generate significant levels of noise.

4.31 The noise climate reported in the noise assessment submitted with the application for the now withdrawn scheme (ref 2018/3498) showed that that, through careful consideration of the building envelope construction, the proposed development should avoid future residents being exposed to harmful levels of noise. It can therefore be concluded that significant adverse impacts on the health or quality of life of those future residents would be avoided.

4.32 In view of the above, it is considered unlikely that the Development would give rise to significant adverse noise and vibration effects to local receptors.

4.33 The proposed development is not considered to cause significant impacts in respect to noise. Therefore, an EIA is not required in respect of this topic.

Cumulative Scenario

4.34 It is assumed the construction activities of the Cumulative Schemes will be effectively managed by a CEMP. This will reduce disruption to the surrounding sensitive receptors so significant effects are less likely but with such a substantial amount of redevelopment in very close proximity, effects may still be significant albeit temporary in nature.

Ecology and Nature Conservation

Baseline Information

4.35 There are no international, national, or local ecological designations within the Site.

4.36 The following Sites of Special Scientific Interest (SSSIs) can be found within 10km of the Site boundary:

- Brent Reservoir SSSI is of interest primarily for breeding wetland birds and in particular for significant numbers of nesting great crested grebe and is located 2 km north. The Site is located within the SSSI Impact Risk Zone for this SSSI.
- Hampstead Heath Woods SSSI, long-established high forest woodlands comprising an abundance of old and over-mature trees providing dead wood habitat for a range of invertebrate species, is located 5.1k m northeast.

- Barn Elms Wetland Centre SSSI, containing various wetland habitats supporting nationally important wintering populations of shoveler and an assemblage of breeding birds associated with lowland waters and their margins is located 7.4 km south.
- Syon Park SSSI, an area of tall grass washland along the Thames in Greater London, contains several invertebrate species with a restricted distribution. It is located 8.8 km southwest.
- Bentley Priory SSSI comprises an intricate mosaic of unimproved neutral grassland, ancient and long-established woodland, scrub, wetland and open water, and is located 9.1 km northwest.

4.37 Six statutory sites of county significance, all Local Nature Reserves (LNRs) can be found within 5 km of the site:

- Brent Reservoir / Welsh Harp LNR, located 1.8 km north;
- Westbere Copse LNR, located 2.2 km east;
- Wormwood Scrubs LNR, located 2.6 km south;
- Fryent Country Park LNR, located 3.4 km northwest;
- Masons Field LNR, located 3.9 km northwest; and
- Fox Wood LNR, located 4.4 km southwest.

4.38 There are 8 non-statutory designated sites lie within 1km of the Site boundary, all of which are Sites of Local Importance for Nature Conservation (SINCs):

- Metropolitan Line between Kilburn and Neasden Grade I SINC BI06B, located c.250 m north.
- Dudding Hill Loop between Cricklewood and Harlesden Grade I SINC BI06C, located c.670m northwest;
- St Mary's Churchyard Grade I SINC BII12, located c.700m west;
- Gladstone Park Grade II SINC BII03, located c.650m north;
- Roundwood Park and Willesden New Cemetery Grade II SINC BII04, located c.320 m southwest;
- Willesden Reservoir Grade II SINC BII15, located c.800m southeast;
- Griffin Close Scrub Grade II SINC L20, located c.500m northeast; and
- The Canal Feeder Grade II SINC BII01, located c.960m west.

4.39 There are limited habitats on the Site, with the majority of the Site being buildings and hardstanding.

4.40 A Preliminary Ecological Appraisal (PEA) undertaken in 2022 indicated that the Site is mostly hardstanding, with small areas of bramble scrub and ruderal vegetation. Two of the buildings on site were judged to be of negligible value to roosting bats with one of low value. The site is considered to be of low value for nesting birds and negligible value for other protected species constraints.

Demolition and Construction

4.41 Each of the ecological designations listed are a significant distance from the Site and are geographically separated by extensive pre-existing urban development. As such, it is not anticipated that the construction and demolition works of the Development would lead to any significant effects, direct or indirect, on protected species, habitats or ecological features of value.

4.42 The CEMP will include best practice environmental management controls during the demolition and construction. This will include measures to reduce noise, dust emissions and night-time light emissions.

4.43 In-line with best practice and to avoid a contravention of the Wildlife and Countryside Act, 1981 (as amended), standard mitigatory precautions would be implemented. This would include timing the building demolition and vegetation clearance works outside of the nesting bird season, or where this is not possible, a pre-clearance nesting bird check would be completed by a suitably experienced ecologist. Similarly, in respect of potential bat roosts, appropriate timing of sensitive demolition works would be employed outside of the active bat roosting season to avoid any impact on roosting bats within the on-Site structures. As a result and given the existing low ecological value of the site it is considered that significant effects on features of ecological or biodiversity value would be unlikely due to the construction works.

Completed Development

4.44 The operational Development is not anticipated to have any significant adverse ecological effect. The continued management of the soft landscaping within the Site is anticipated to provide a beneficial effect for local biodiversity. An Ecological Assessment is submitted with the planning application. Initial Biodiversity Net Gain (BNG) calculations indicate a net gain of 10.6% can be achieved and while this is clearly a benefit the starting point for the calculation and the small area of the site mean that this increase would not be significant on a local or borough basis.

Cumulative Scenario

4.45 In the Cumulative Scenario, the Cumulative Schemes would also proceed in accordance with relevant wildlife legislation to ensure adequate protection of protected and notable species. As such, no cumulative effect on flora or fauna is likely to arise during demolition and construction.

4.46 Once completed, the Cumulative Schemes will also provide biodiversity enhancements through the provision of new habitat creation and improved soft landscaping from the baseline. No significant adverse cumulative effects are therefore anticipated from the Development and Cumulative Schemes together once complete.

Townscape, Visual Amenity and Built Heritage Assets

Baseline Information

4.47 A desk-based review of the Site and its environs using DEFRA's Magic Map reveals that the Site is not located within, or in immediate proximity to, a World Heritage Site or Conservation Area. The nearest Conservation Area is the Willesden Green Conservation Area, located 700m southeast. There are no Scheduled Monuments or Listed Buildings within the Site.

4.48 Two Registered Parks & Gardens are located within local proximity to the site:

- Willesden Jewish Cemetery (United Synagogue Cemetery), located 170m south and
- Roundwood Park located 630m south.

4.49 Eight Listed Buildings exist within a 500m study area of the Site. Five are associated with the Willesden Jewish Cemetery (United Synagogue Cemetery) Registered Park, these are:

- *'War Memorial, Willesden Jewish Cemetery*' (Grade II), located 220m south of the Site;
- '*Willesden Jewish Cemetery (United Synagogue Cemetery)*' (Grade II), located 320m south of the Site;
- '*Complex of Funerary Buildings at Willesden Jewish Cemetery (United Synagogue Cemetery)*' (Grade II), located 330m south of the Site;
- '*Tomb of Max Eberstadt, Willesden Jewish Cemetery (United Synagogue Cemetery)*' (Grade II), located 390m south of the Site; and
- '*Burial enclosures of Mayer, Juliana and Hannah Rothschild in Willesden Jewish Cemetery (United Synagogue Cemetery)*' (Grade II), located 480m south of the Site.

4.50 Other Listed Buildings within 500m of the Site comprise:

- *'Church of St Mary'* (Grade II*), located 490m west of the Site;
- '*1 Shortcroft Mead Court'*, locally listed, located 150m northwest; and
- *'Willesden 7th Day Adventist Church'*, locally listed, located 210m south.

4.51 The Site is not situated within any areas designated in recognition of its landscape quality or value at either a statutory national level Areas of Outstanding Natural Beauty (AONB), National Parks, or at a non-statutory local level (Special Landscape Areas or Local Green Space designations).

4.52 The Site is not located within a Protected Vista, as defined within the London View Management Framework (LVMF)[3]. While much of the area around the site is two to three storeys in height with some more isolated locations extending above this it is evident that taller development is arising to the north of the site on Dudden Hill Lane to the north of the railway line with the nine storey Warranty House development and the six storey JP Moran building and six storey Chancel House to the west. The site's immediate surrounds are dominated by the existing large form commercial units to the north and west which provide separation from and intercept views from public areas beyond such that only upper storeys of the proposed development would be visible from the north and west.

Demolition and Construction

4.53 As noted above, the Site is not within a Conservation Area and there are no Listed Buildings, Scheduled Monuments within, or in proximity to, the Site. Due to the significant distances from any features of built heritage importance and the Site's location within an urban context, the Development is not anticipated to have a significant direct or indirect effect on any such features during its construction.

4.54 The physical presence of a construction site would give rise to the presence of visible hoardings, plant and machinery and other activities associated with the works. However, any townscape and visual effects associated with the works would be limited, localised and temporary due to the enclosed nature of much of the site.

4.55 Furthermore, the implementation of standard best practice management of the demolition and construction works and a range of good construction site housekeeping initiatives would be implemented with the aim of reducing effects on townscape, visual amenity and the setting of heritage assets. These will include, but not limited to:

- The maintenance of adequate construction site hoarding; and
- The orderly segregation of particular construction site activities, for example, the clear delineation of construction site offices and staff facilities, material storage areas, plant and machinery storage areas.

4.56 As the works proceed and the built form of the Development emerges, the townscape and visual characteristics of the Site will adjust to those that will be generated by the presence of the completed

[3] Greater London Authority (2012) London View Management Framework

and operational Development. Overall, the most noticeable landscape and visual effects of the proposed development during construction will be largely confined to the Site and more immediate surrounds. The identified mitigation can be controlled through a CEMP controlled through a standard condition on a planning permission. As a result significant effects on townscape and heritage features are not anticipated during construction.

Completed Development

4.57 The Proposed Development will introduce a high level of improvement across the site, resulting in a high magnitude of change but is considered to be beneficial through the delivery of a higher quality of architecture and greater optimisation of the Site.

4.58 The potential effects of the Proposed Development are the enhancement of the identified heritage assets indirectly through effects on setting once the Proposed development is complete and occupied. The effects on heritage receptors will depend principally on the level of visibility of the Proposed Development within the setting of heritage receptors, which is low in number, or in conjunction with the receptor, also low in number. In any case, no significant adverse effects are likely to arise as a result of the Proposed Development, given its quality design and responsive approach.

4.59 The effects of the Proposed Development on the immediate and wider townscape are expected to range between Major and minor. The nature of the effects are mostly expected to be either neutral, if far away from the Site or in conjunction with sensitive receptors, or beneficial when close to the Site, as the Proposed Development's architectural composition, which is responsive to the townscape sensitivities, would improve the quality of the streetscape character. No significant adverse effects are likely to arise as a result of the Proposed Development on the townscape character of the area.

4.60 Views from the residential areas to the south, south-east and east are addressed through the proposed layout. The proposed building heights and massing are designed to be commensurate to the surrounding context and to respond to the immediate surrounds the height is located towards the centre of the site, the least sensitive area, to minimise impact on the surrounding area and local townscape. The height, roofline and appearance of the development would be varied in order to provide visual interest and would break up the mass of development in local and wider townscape views to mitigate visual impacts.

4.61 As a result while the development would be visible in local views its effect on the townscape would contribute to the variety on the urban form and interest of the area but would be local effects that would be unlikely to have adverse significant effects on views from any important local or longer distance viewpoints.

4.62 Considering all of the above, it is not anticipated that the Completed Proposed Development would have significant adverse effects upon built heritage, townscape character or views. A Townscape, Built Heritage and Visual Impact Assessment is being prepared by The Townscape Consultancy and will be submitted as a standalone report alongside the planning application.

Cumulative Scenario

4.63 It is assumed the visual intrusiveness associated with the construction of the Cumulative Schemes nearby will be effectively managed by CEMP during the works helping to minimise cumulative effects should the construction of the Cumulative Schemes and the Development coincide.

4.64 The scale and type proposed for the Development would be consistent with that which is proposed for the Cumulative Schemes, and upon completion, the Development and the identified Cumulative Schemes will contribute to an improvement in the quality of built environment (including public realm, and residential and commercial premises).

4.65 As such significant cumulative effects from the works associated with the Development and Cumulative Schemes together is not considered likely.

4.66 To conclude, in view of the above, significant adverse effects on the townscape and heritage assets identified are considered unlikely and it is deemed that the Townscape, Heritage, and Visual Impact Assessment would not require an EIA; however, the effects of the Proposed Development will be assessed in a THVIA, to be submitted alongside the planning application.

Archaeology

Baseline Information

4.67 As previously mentioned, the Site does not contain, or is within proximity to, any Scheduled Monuments.

4.68 There are two Sites of Archaeological Importance, located 330m west and 960m northwest. Site investigations undertaken in relation to planning permission 2018/3498 stated that, given the known past impacts within the Site boundary, the potential for the survival of significant or complex archaeological deposits from the Prehistoric – Medieval periods, including those potentially within the Sites of Archaeological Importance, is thought to be Low.

4.69 Should these survive, they are thought to be of Local importance, at most. The potential for the survival of deposits relating to the Post-Medieval and Modern occupation of the Site, including those potentially within the Sites of Archaeological Importance, is thought to be Medium-Low. However, should such

deposits survive, they are considered to be of Negligible importance, at most. This is due to their limited historical and archaeological interest.

Demolition and Construction

4.70 In light of the above information, it is unlikely that demolition would result in adverse impacts to archaeology.

The Completed Development

4.71 The completed and operational Development would not give rise to any activities that necessitate intrusive ground works. Consequently, there would be no potential for any archaeological effects once the Development is completed and operational.

Cumulative Scenario

4.72 No discrete and localised buried heritage assets shared with the Cumulative Schemes are anticipated and no significant cumulative effects are, therefore, predicted to arise.

Geology, Ground Conditions and Contamination

Baseline Information

4.73 The underlying bedrock of the site is the London Clay Formation, comprising clay, silt and sand. There is no superficial geology recorded for this location.

4.74 The Site is not located within a Groundwater Source Protection Zone (SPZ).

4.75 No historic or active landfills have been identified within 1km of the Site.

4.76 The Ground Conditions assessments of the withdrawn application (ref 2018/3498) indicates that the Site has undergone multiple redevelopments over time, and as such made ground is likely to exist beneath the hardstanding at the site. It is recommended that further investigation is undertaken to confirm the ground conditions at the Site. In the event that gas is identified, the risk could be managed via design by use of gas proof membranes in the development.

Demolition and Construction

4.77 With the exception of made ground potentially being present within the Site, no sources of environmental concern have been identified. The potential for significant contamination to have arisen at the Site as a result of the current and former usage on-site is likely to be low. However, the possibility of contamination albeit likely to be localised cannot be discounted. This is true for the surrounding area

also. With implementation of standard mitigation measures that are controlled though the Environmental Protection Act and Contaminated Land Statutory Guidance which establish the need for and methods of determining and remediating contamination and validating the remediation and these measures can also be controlled through a standard planning condition to ensure a significant effect on the environment does not arise. Therefore a significant effect on the environment as a result of ground contamination is not likely and as such an EIA would be required.

Completed Development

4.78 The Development does not propose any land uses or activities that would inherently be of a contaminative nature. Consequently, the Development would be unlikely give rise to any significant contamination risks or effects once completed.

Cumulative Scenario

4.79 In the event the Cumulative Schemes encounter contamination issues, it is considered reasonable to assume the implementation of best practice environmental management controls and additional legislative requirements (separate to the EIA Regulations) would mean all matters would be (or have been) adequately dealt with so as to prevent significant effects on human health and/or the environment. Therefore, it is unlikely significant ground conditions or contamination cumulative effects would result either during construction or on completion and operation of the Development and the Cumulative Schemes together.

Flood Risk and Drainage

Baseline Information

4.80 A desk-based review of the EA's Flood Map for Planning service[4] indicates that the Site is located within Flood Zone 1, indicating a low probability of flooding. Flood Zone 1 is land defined as having an annual probability of fluvial flooding of less than 1 in 1000 (<0.1%) and is categorised as an area with little or no risk of fluvial or coastal/tidal flooding.

4.81 The nearest watercourse to the site is the Mitchell Brook located 800m to the west of the site, this watercourse connects to the River Brent located over 1.8km to the west of the site.

[4] DEFRA (2022) Flood Map for Planning. Available at: https://flood-map-for-planning.service.gov.uk/

4.82 The now withdrawn scheme (ref 2018/3498) indicates that Environment Agency flood maps do not identify significant risk from watercourses in this area. There is no risk of fluvial flooding to the Development.

Demolition and Construction

4.83 There is no indication that the Site is at risk from groundwater, sewer, fluvial (river) or reservoir flooding.

4.84 The rate of surface water runoff would be restricted, in-line with the requirements of the London Plan. As a result, the risk of surface water flooding would decrease over the existing baseline and it can be concluded that significant flood related effects off-Site, as a result of an increase in the rate of surface water runoff of from the Development, are unlikely.

4.85 Considering all of the above, the demolition and construction works are not anticipated to generate significant effects or risks in relation to flooding and drainage.

The Completed Development

4.86 Climate change considerations require that the completed and operational Development must be designed with the resilience to cope with increases in precipitation frequency and intensity which may give rise to increased incidences of surface water flooding events.

4.87 The design of the Development is therefore informed by an appropriately qualified and experienced surface water drainage engineer. This will ensure the inherent design measures of the Development will safeguard against surface water flooding risks and effects at the Site and elsewhere, even accounting for climate change. Similarly, the drainage strategy for the Development will be designed so that any additional demand for foul water drainage associated with a new resident population at the Site will be adequately accommodated, thereby avoiding incidences of foul water flooding.

Cumulative Scenario

4.88 It is assumed that with the implementation of best practice environmental management controls to minimise effects during the works for both the Development and the Cumulative Schemes, it is unlikely cumulative effects would result in the event they overlapped.

4.89 It is assumed that, as for the Development, suitable mitigation will be implemented to minimise surface water flood risk effects as part of the design and planning permission for each of the surrounding Cumulative Schemes. Therefore, it is unlikely significant cumulative effects will result with the completed Development and the Cumulative Schemes together.

Socioeconomics

Baseline Information

4.90 The site is located in an area of mixed uses with large areas of residential development to the northeast and southwest and with large areas of commercial development to the north and west. The 2019 Indices of Deprivation[5] indicate that the most highly deprived areas in the borough are concentrated in Stonebridge and Harlesden to the west and south of the site. Dudden Hill itself is the eighth most deprived ward of the 21 wards in the LBB. The ward is 8th worst in terms of income and employment, 12th worst in regard to barriers to housing but 6th worst in terms of the living environment.

4.91 There are five primary schools within 0.5 miles of the site, the capacity of these schools, their pupil numbers and spare capacity is shown in Table 4.1 below.

Table 4.1 Primary School capacity within 0.5 miles of the Site[6]

Primary Schools Within 0.5 miles	School Capacity	Roll	Spare Capacity
Northview Junior and Infant	250	220	30
St Mary's CofE Primary School	355	221	134
Leopold Primary School	870	693	177
St Andrew and St Francis CofE Primary School	407	433	-26
Gladstone Park Primary School	682	651	31
Total	**2564**	**2218**	**346**

4.92 Table 4.1 indicates a capacity of nearly 350 places within a short distance of the site.

4.93 There are also seven secondary schools within three miles of the site, the capacity of these schools, their pupil numbers and spare capacity is shown in Table 4.2 below.

Table 4.2 Secondary School capacity within 3 miles of the Site[7]

Secondary Schools Within 3 miles	School Capacity	Roll	Spare Capacity
Menorah High School for Girls	378	358	20
Newman Catholic College	1000	721	279
Hampstead School	1320	1326	-6
All Saints Catholic College	780	588	192
St Augustine's Federated Schools: CE High School	1000	1024	-24

[5] Brent JSNA (2019) 2019 Indices of Deprivation
[6] https://www.get-information-schools.service.gov.uk/
[7] https://www.get-information-schools.service.gov.uk/

Secondary Schools Within 3 miles	School Capacity	Roll	Spare Capacity
JFS	2165	2057	108
St Mary's and St John's CofE School	1780	1506	274
Total	**8423**	**7580**	**843**

4.94 Table 4.2 indicates a capacity of nearly 843 places within three miles of the site.

4.95 Table 4.3 below identifies that there are eight GP practices within 1 mile of the site that are accepting patients from the area in which the site is located.

Table 4.3 GPs within 1 mile of the Site[8]

GP Practices Within 1 mile
The Willesden Medical Centre
Church End Medical Centre
Roundwood Park Medical Centre
Burnley Medical Practice
Neasden Medical Centre
Brentfield Medical Centre
St Andrews Medical Centre
Greenhill Park Medical Centre

4.96 The number and location of GP facilities indicates that there would be reasonable access to GP services from the site.

Demolition and Construction

4.97 There is anticipated to be an increase in direct, indirect and induced employment associated with the construction activities on-Site. However, in the context of existing employment within the wider area the effects are unlikely to be significant.

4.98 The demolition of the existing development on the Site is not anticipated to result in any direct loss in employment as most units are already vacant and vacant possession will have been achieved with existing businesses having relocated to alternative premises.

4.99 There is anticipated to be an increase in direct, indirect and induced employment associated with the construction activities on-Site. However, in the context of existing employment within the wider area the effects are unlikely to be significant.

[8] https://www.nhs.uk/

The Completed Development

4.100 There are a number of extensive areas of public open space in the area around the Site, including open areas around Willesden Cemetery, Roundwood Park to the south and Gladstone Park to the north. The Development would provide a range of amenity areas both private and communal. The Development would provide the required amount of private amenity space through the provision of balconies and green roofs with dedicated and informal play space.

4.101 The completed and operational Development would also provide permanent local employment opportunities at the new commercial floorspace. The proposed development would provide approximately 1,932 sqm of industrial floorspace and 2,003 sqm of retail floorspace comprising a supermarket and café. This amount of floorspace in these uses would generate approximately 150 FTE jobs which is not a significant number in the borough context.

4.102 Once the Development is completed and operational, the resident population of the area will increase. As such, there will be an increased demand for social and community infrastructure and services in the form of education provision for school aged children; health care provision such as new patient spaces at GP surgeries and dentists; open space and play space and shops and local facilities. The baseline data indicates that there is existing capacity at local schools, however, financial contributions can be made through Section 106 and Community Infrastructure Levy to offset the demand for local education and health services which would avoid significant effects.

4.103 Taking into account the above baseline information, the completed Development is not anticipated to generate significant socioeconomic effects.

Cumulative Scenario

4.104 The Cumulative Schemes will also generate direct, indirect and induced employment opportunities during the demolition and construction works and once the Development is completed and operational. However, the cumulative effect on employment from the Development and Cumulative Schemes together would unlikely be significant and the contribution of the Proposed Development would be small.

4.105 The Development and Cumulative Schemes together will likely lead to an increased demand for health and education facilities. However, as for the Development, it is expected that financial contributions will have been made for the Cumulative Schemes through Section 106 and Community Infrastructure Levy to offset the demand for local health and education services.

Daylight, Sunlight and Overshadowing

Baseline Information

4.106 Residential receptors/properties are usually the most sensitive to daylight and sunlight availability. In the baseline, those of relevance to the Site are located to the east of the Site on Dudden Hill Road, to the south on Colin Road and to the west on High Road.

4.107 The existing structures on the Site do not materially obstruct the daylight and sunlight permeability through the Site. As a result, neighbouring receptors will receive largely unobstructed access to daylight and sunlight in the baseline.

4.108 In these instances, it is not uncommon for the recommendations set out in the BRE guidelines to be exceeded, particularly where receptors neighbour sites designated for development such is the case with the proposed site. In these instances, the use of alternative targets is not uncommon and detailed discussions on this approach have been held with Brent Officers at pre-application stage.

4.109 The uses of the properties surrounding the Site have been established using desktop external observations and data from the Valuation Office Agency (VOA) website. As mentioned above, residential receptors/properties are usually the most sensitive to daylight and sunlight availability. The daylight and sunlight assessments will therefore consider the effects upon the residential properties surrounding the Site. Overshadowing to the rear gardens along Colin Road is not expected that any significant due to them being located to the south of the Site.

4.110 Commercial and light industrial properties are generally deemed to have a greater reliance upon supplementary electric lighting and therefore will not be considered sensitive receptors. Therefore, the commercial units to the north (Sapcote Trading Estate), along Dudden Hill Lane and along Colin Road will not need to be considered.

Demolition and Construction

4.111 Owing to the evolving and changing nature of demolition and construction and any phasing activities, the assessment of potential effects during the demolition and construction of the Proposed Scheme on daylight and sunlight will not been modelled and analysed.

4.112 Effects in relation to daylight and sunlight would vary throughout the demolition and construction stage. They would, however, be less than the effects of the completed Proposed Development. Those effects, which may be perceptible during demolition and construction, would be similar or less when compared to those of the completed Proposed Development set out below.

The Completed Development

4.113 A daylight and sunlight assessment of the Proposed Development will be undertaken with respect to the microclimatic issues. The sensitive receptors have been identified as the existing residential dwellings located around the Site. Detailed technical assessments will be based on a survey-based scale three-dimensional contextual computer model of the existing and Proposed Scheme situations.

4.114 The assessment of daylight and sunlight would be based upon the methodologies set out in the Building Research Establishment (BRE) Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice, 3rd Edition (2022). Daylight tests of Vertical Sky Component (VSC) and no-sky-line (NSL) will be carried out, alongside the sunlight tests of Annual Probable Sunlight Hours (APSH).

4.115 Sun hours on the ground and transient overshadowing assessments will be also undertaken, using the above analysis model in order to establish the extent to which surrounding areas of amenity space and those within the Proposed Scheme are affected by the construction of the Proposed Scheme.

4.116 Residential accommodation within the Proposed Development will require acceptable levels of daylight and sunlight amenity and any areas of open amenity space within the Proposed Development would require acceptable levels of Sun on Ground.

4.117 Daylight would be reduced to properties to the north, west and east. Properties to the north and west are currently in commercial use and not sensitive to changes in daylight and sunlight. There are no receptors to changes in daylight located sufficiently close to the east of the Site to be significantly affected. The scale of the development in the southern part of the site is similar to that of the existing and as such that changes in daylight to these properties would not be significant.

Cumulative Scenario

4.118 There are a number of consented schemes within the local vicinity of the Site. However, having reviewed each of these schemes it is not considered that any of the current consents could have a material bearing on the baseline analysis and therefore additional cumulative/future baseline analysis is not required as significant cumulative effects are unlikely.

Wind Environment

Demolition and Construction

4.119 The site is surrounded by low-rise buildings of two to three storeys on average with no tall structures or buildings and no particular exposure to the strongest and prevailing south-westerly winds.

Therefore the existing wind environment within the Site and its surroundings is suitable for the current usages and expected to be within the recommended criteria both for pedestrian safety and comfort.

4.120 The potential effects on wind microclimate at the Site during the construction works will be continuously varying as construction progresses. However, qualitatively it can be stated that as demolition and construction of the development proceeds, the wind conditions at the Site would progressively approach those of the completed development. It can also be anticipated that the effects on the wind microclimate on the Site during construction will be of lesser magnitude than those that will be experienced once the development has been completed.

4.121 In addition during construction sensitive receptors to the wind environment (such as residents and pedestrians) would not be present on the site.

The Completed Development

4.122 The proposed buildings are not of a scale that would mean that wind conditions would not remain within the safety criteria at pedestrian level both within and in the adjacent areas of the site. At balcony level wind effects are likely to be stronger, especially at the upper levels, however safety criteria can be expected to be satisfied at all balconies. Where wind effects are expected to be strongest at south east facing balconies 1.5m solid balustrades would be used as these are typically a suitable mitigation measure in such circumstances. Similarly, local mitigation can be provided if required at terrace levels.

4.123 The built-up nature of the surrounding area indicate that ground level comfort levels will be suitable for their intended purpose with entrances located away from windier areas for suitably mitigated with measures including additional landscape, screening and/or recessed entrances. Suitable conditions for outdoor amenity spaces can also be achieved through localised mitigation measures such as planting or landscaping structures.

4.124 It is therefore considered that the site and the proposed development would give rise to a wind microclimate at and around the site that would be suitable for the intended purpose and that any areas of exceedance of this could be mitigated using standard techniques should and landscaping. As a result significant environmental effect are considered unlikely.

Cumulative Scenario

4.125 As the adjacent consented schemes are only extensions and small buildings, the Cumulative effects are likely to be similar to those of the proposed conditions with no further impacts expected.

Climate Change

Demolition and Construction

4.126 Climate change is global in cause and effect. It therefore follows that by virtue of the scale of the construction site and the Development, the Works are unlikely to significantly contribute to global climate.

4.127 In relation to the emission of greenhouse gases construction vehicular traffic volumes and flows (and therefore emissions which will include greenhouse gasses) are unlikely to be significant when considering the quanta of existing background traffic and associated emissions. It is also anticipated that modern, efficient and low carbon emitting construction plant and machinery will be used throughout the Works.

4.128 As previously noted, climate change is global in cause and effect. It therefore follows that by virtue of the scale and nature of the Development, its operation will not significantly contribute to global climate change. However, the Development will be designed to minimise greenhouse gas emissions and to ensure resilience to climate change.

The Completed Development

4.129 The overall vehicular trip generation from the Development is likely to be materially less than that of the existing situation. As such, the Development is unlikely to give rise to significant vehicular traffic effects. It therefore follows that the Development is unlikely to give rise to significant changes to vehicular traffic emissions which will include for greenhouse gases.

4.130 Sustainability is at the forefront of the environmental considerations and has been a key driver for the proposals. The design of the Development is being informed by the Applicant's Sustainability and Building Services Engineer. This will ensure that in line with relevant policy requirements and industry standard guidelines, the Development will incorporate many inherent sustainability design features which will minimise the overall carbon footprint and greenhouse emissions arising from the Development. Such measures will include, but not be exclusive to:

- The selection and use of building materials from sustainable sources and with low embodied carbon.
- The incorporation of appropriately designed façades to balance solar gain against daylight availability.
- The use of good levels of insulation for wall, floor and roof elements, thereby reducing heat demand.

- The use of thermally efficient windows to reduce head demand.
- The achievement of good levels of air tightness.
- The use of energy efficient lighting.
- Green Building certification: Ensuring the highest credentials can be achieved, targeting the highest levels of Building Research Establishment's Environmental Assessment Method (BREEAM) – an 'Outstanding' rating, an Energy Performance Certificate (EPC) rating of 'A'.
- Careful material selection and the use of high efficiency building services to minimise the operational and embodied carbon emissions.

4.131 The design of the Development is being informed by an appropriately qualified and experienced surface water drainage engineer. This will ensure inherent design measures of the Development will safeguard against surface water flooding risks and effects at the Site and elsewhere, even accounting for climate change.

4.132 Therefore a significant effect on carbon emissions and climate change is unlikely and effects on the development as a result of climate change have been addressed and therefore significant effects are unlikely.

Cumulative Scenario

4.133 As for the Development, it would be anticipated that the demolition and construction works associated with the Cumulative Schemes would be completed in line with best practice environmental measures as to ensure minimal carbon emissions where possible.

4.134 It is expected that the Cumulative Schemes will also be designed to minimise greenhouse gas emissions and to ensure resilience to climate change in line with the London Plan. Therefore, it is unlikely the cumulative effect of the Cumulative Schemes with the Development together would have a significant effect on greenhouse gas emissions and climate change.

Health and Wellbeing

Demolition and Construction

4.135 Previous sub-sections (Geology, Ground Conditions and Contamination, Noise, Air Quality, Wind Environment, Flood Risk and Drainage and Socioeconomics) have demonstrated that the demolition and construction works are not anticipated to give rise to any significant contamination, air quality, noise, wind microclimate, flood risk and / or socioeconomic effects, all of which have the potential to affect human health and wellbeing.

4.136 The likelihood of insignificant effects for all relevant topics is by virtue of the nature and location of the Development, together with the implementation of a broad range of standard, tried and tested construction related best practice environmental management controls. Consequently, the health and wellbeing of construction site workers, local residents, local workers and visitors to the locality is unlikely to be significantly affected by the demolition and construction works.

The Completed Development

4.137 Similar to the above, previous sub-sections (Geology, Ground Conditions and Contamination, Noise, Air Quality, Wind Environment, Flood Risk and Drainage and Socioeconomics) demonstrate that the completed and operational Development are unlikely to give rise to significant contamination, air quality, noise, pedestrian comfort and safety, flood risk and / or socio-economic effects. As such, with the Development in place, these environmental factors are unlikely to significantly affect the health and wellbeing of local residents, local workers, users and visitors of the Development and the surrounding locality.

Cumulative Scenario

4.138 The above statements regarding the Development in isolation are also valid for the Cumulative Schemes. Consequently, there is no potential for significant cumulative health and wellbeing effects during any concurrent demolition and construction works or following completion and operation of the Development and the Cumulative Schemes.

Waste

Demolition and Construction

4.139 The demolition and construction works would inevitably generate waste, as is the case for any redevelopment project. However, the Site Waste Management Plan (SWMP) and CEMP will ensure that waste is managed in-line with relevant legislation and best practice to minimise waste generation and maximise reuse and recycling during the demolition and construction works.

4.140 The demolition and construction works will not include any activities that will give rise to particularly hazardous waste materials.

The Completed Development

4.141 The Development would generate waste through its operation. However, in-line with local and national requirements, the Development will be designed to ensure that sufficient space and facilities are

provided for the storage of segregated general and recyclable waste. In addition, the servicing of the Development will allow for adequate waste collection and disposal, as necessary.

4.142 The operational Development will not include any land uses or activities that will give rise to particularly hazardous waste materials.

Cumulative Scenario

4.143 As for the Development, the Cumulative Schemes are also expected to employ good waste management practices during the Works so that significant cumulative effects are unlikely to occur from the Development and Cumulative Schemes together.

4.144 Similarly, the Cumulative Schemes will not include for any land-uses or activities that will give rise to particularly hazardous waste materials and it is assumed that they will be designed to ensure that sufficient space and facilities are provided for the storage of segregated general and recyclable waste in line with policy requirements. Significant cumulative effects are therefore unlikely to occur from the Development and Cumulative Schemes together, once completed and operational.

Risk of Major Accidents and Disasters

Demolition and Construction

4.145 All demolition and construction works would be managed in accordance with best practice environmental management controls and relevant regulations. Furthermore, with standard, tried and tested construction related best practice environmental management controls in place, previous subsections (Geology, Ground Conditions and Contamination and Flood Risk and Drainage) demonstrate that the demolition and construction is unlikely to give rise to significant risks associated with contamination and surface water flooding. As such, significant risks of major accidents and disasters during the demolition and construction would not be considered likely.

The Completed Development

4.146 The completed and operational Development does not propose any land uses that would increase the risk of major accidents and disasters by virtue of being hazardous or operating complex processes. Furthermore, previous sub-sections (Geology, Ground Conditions and Contamination and Flood Risk and Drainage) demonstrate that the completed and operational Development would unlikely give rise to any significant contamination or flood risk and would not be susceptible to increased future flood risk.

4.147 A desk-based review of the Health and Safety Executive (HSE) COMAH register indicates that the Site is not located within 3 miles of any COMAH-registered sites. Therefore, it can be assumed that the existing activities around the Site do not pose a risk to the Proposed Development or it's users.

4.148 In view of all of the above, significant effects associated with the risk of major accidents and disasters as a result of the completed Development would be unlikely.

Cumulative Scenario

4.149 The above statements regarding the Development in isolation are valid for the Cumulative Schemes, given that the nature of the proposals for the Cumulative Schemes are similar being urban residential mix use developments. Consequently, there is no potential for significant cumulative risks of major accidents and disasters during any concurrent demolition and construction works or following completion and operation of the Development and the Cumulative Schemes together.

Sensitivity of the Site

4.150 With reference to all of the information provide above, it can be demonstrated that the Site is not located within a 'sensitive area' as defined by the EIA Regulations; that is, a site comprising one or more of the following:

- Site of Special Scientific Interest.
- Land to which Nature Conservation Orders apply.
- International conservation sites.
- National Parks.
- Areas of Outstanding Natural Beauty.
- World Heritage Sites.
- Scheduled Monuments.

Step 4 – Is the proposal likely to have 'Significant Effects' on the Environment?

4.151 Schedule 3 of the EIA Regulations states that when determining whether EIA is required, the characteristics of the development, the sensitivity of the area to be affected and the characteristics of the potential environmental effects must be considered. There are three key tests which are to be undertaken:

- Consideration of the characteristics of the development;
- Consideration of the location of the development; and,

- Consideration of the characteristics of the potential impact.

4.152 Accordingly, we have considered these tests and applied the sub-criteria for each in turn:

Characteristics of the Development

(i) Size of the Development

4.153 As set out previously, the proposed development is screened under Schedule 2, Class 10 'Infrastructure Project' Subsection (b) 'Urban development projects' of the EIA Regulations. The screening criteria for this type of development is the development includes more than 1 hectare of urban development which is not dwelling house development or the development includes more than 150 dwellings, or the overall area of the development exceeds 5 hectares.

4.154 The proposed development does exceed the 150 dwelling threshold and as such has been screened under this criterium.

4.155 As presented earlier in the technical analysis within this report, it is not anticipated the proposed development would lead to significant environmental effects such that they require assessment in an EIA. In addition, future Site users would not be subject to significant environmental effects associated with the existing environment.

(ii) Cumulation with Other Development

4.156 Planning Practice Guidance states that in judging whether the effects of a development are likely to be significant, Local Planning Authorities should have regard to the possible cumulative effects with any existing or approved development. The potential for cumulative effects has been addressed under each of the headings above as appropriate and no significant effects have been identified.

(iii) Use of Natural Resources, in particular Land, Soil, Water and Biodiversity

4.157 The proposed works will be in full accordance with the waste hierarchy to minimise natural resource consumption, and maximise the opportunity to re-use, recycle or recovery. Construction activities will be undertaken in accordance with a SWMP which is a standard mitigation measure that can be controlled through a standard condition. Operational waste streams will be separated to facilitate re-use and recycling. There would be no significant impact on the use of natural resources such that an EIA would be required.

4.158 The Site has been previously developed and so the proposed development would not result in the loss of productive land and soil. The drainage proposals incorporate the use of SUDs techniques and biodiversity enhancements would be included within the proposals to achieve at least a 10% net gain.

(iv) Production of Waste

4.159 The CEMP will include measures to minimise the amount of waste being produced and ensure this is dealt with in accordance with the waste hierarchy and reused and recycled where possible in accordance with the SWMP.

4.160 All material will be dealt with in accordance with the waste hierarchy. The contractors will apply best working practices appropriate on the Site with the intention of avoiding significant or unnecessary environmental effects, managing the production of waste and maximising recycling and reuse of materials. Waste will be segregated into a number of waste streams including general; recycled timber; and plasterboard. Waste transfer notes will be issued for all waste materials removed from the site.

4.161 The proposed development will be designed so that operational waste will be segregated into a number of waste streams to facilitate reuse and recycling. As a result significant waste generation is not anticipated as a result of the proposed development.

4.162 It is not considered an EIA would be required on the basis of waste arisings.

(v) Pollution and Nuisances

4.163 The consideration of air quality, dust and noise has been set out above. This review of the potential construction and operational effects issues has not identified the potential for significant effects on the environment.

(vi) The risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge.

4.164 It is not considered that the proposed end-use is associated with a risk of accident significant for the purposes of requiring an EIA. Risks of accidents during the construction process will be controlled by health and safety measures in full compliance with national standards and legislation. It is not anticipated that future occupiers of the proposed development would handle quantities of hazardous materials that any local authority of HSE licensing would be required. Drainage of the Site will be designed making allowance for the predicted effects of climate change. A significant risk of accidents and disasters including those potentially posed by climate changes are not considered to be significant.

(vii) The risks to human health

4.165 The proposed use of the Site is not one with a significant risk to employees and all relevant health and safety and other employment legislation will be enforced so that risks to health are minimised. A significant risk to human health is not considered likely.

Location of the Development

(i) The Existing Land Use

4.166 Discussion on the sensitivity of the existing Site features have been presented earlier in this report.

(ii) The relative abundance, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground

4.167 Discussion on the sensitivity of natural resources has been presented earlier in this report.

(iii) Absorption Capacity of the Natural Environment

4.168 The EIA Regulations state that particular attention should be paid to wetlands; coastal zones; mountain and forest areas; nature reserves or parks; areas designated under European Union (EU) Directives on the conservation of wild birds, natural habitats, flora and fauna; areas in which environmental standards have been exceeded; densely populated areas; or landscapes of historical, cultural or archaeological significance. The Site possesses only one of these characteristics (densely populated area) and is therefore considered to possess sufficient absorption capacity to allow development to proceed. The proposed development is at sufficient distance from these features and is of a nature that would have very limited potential to affect these features such that significant effects on these features is unlikely.

Characteristics of Potential Impact

(i) Magnitude and Spatial Extent of the Impact (for example geographical area and size of the population likely to be affected)

4.169 Construction phase effects such as noise and vehicle movements will be limited to the Site and the immediate surrounding area. The impacts associated with construction can also be easily controlled by enforceable good practice.

4.170 Physical impacts will be limited to the Site itself and are short term. Potential off-site operational impacts relate to the change in the townscape character. Overall, potential impacts are not assessed as significant, such that an EIA is required.

(ii) The Nature of the Impact

4.171 The nature of potential impacts has been discussed earlier in this report.

(iii) Transboundary Nature of the Impact

4.172 Transboundary impacts are not applicable for a development of this nature and scale in this location.

(iv) Intensity and Complexity of the Impact

4.173 The impacts during the construction phase would be of a relatively small scale and would relate to standard construction impacts such as noise and vehicular movements that they could be addressed through standard best practice operating procedures.

4.174 Overall, it is not considered that the magnitude and complexity of potential impacts is sufficient so as to require an EIA to evaluate and offset them.

(v) Probability of the Impact

4.175 Impacts such as noise are considered likely to occur on a localised level only and are easily addressed through appropriate site best practice measures. Any adverse ground conditions will be robustly mitigated through commonplace measures set out within a remediation strategy and environmental management plans.

4.176 Other potential impacts are considered highly unlikely due to the low sensitivity / risks on the site, the proposed works and the ease of applying enforceable and commonplace mitigation measures.

(vi) Expected onset, duration, frequency and reversibility of impact

4.177 Any impacts linked to enabling works would be short term or temporary in nature. In the longer term, the limited number of sensitive receptors in proximity to the Site strongly suggests that there will be no long term significant adverse effects associated with the proposed development. Measures will be implemented through condition to limit the operational effects of the proposed development such that significant effects do not occur.

(vii) Cumulation of the impact with the impact of other existing and/or approved development.

4.178 The cumulation of the proposed development's impact with existing and/or approved development has been discussed previously in the report.

(viii) Possibility of effectively reducing the impact

4.179 Measures to effectively reduce any potential impacts have been discussed throughout the report in each relevant section.

5. Summary and Conclusions

5.1 The Development has been screened under Schedule 2, Class 10 'Infrastructure Project' Subsection (b) 'Urban development projects'. The screening criteria for this type of development is if:

- The development includes more than 1 hectare of urban development which is not dwelling house development; or
- The development includes more than 150 dwellings; or
- The overall area of the development exceeds 5 hectares.

5.2 As such, an EIA Screening Report has been prepared on this basis. The report has identified the following key points:

- The Site is not located in a 'sensitive area' as defined by the EIA Regulations. Accordingly, the absorption capacity of the natural environment in and surrounding the Site is judged to be high; the Site and its immediate surrounds are resilient to change.

- The Development is considered to be consistent in scale and type with the existing and emerging urban context surrounding the Site.

- The effects associated with this type of development are not of a level of magnitude, complexity or significance such that an EIA would be required to evaluate them.

- The potential for significant effects is low and can be adequately dealt with via the standard legislative requirements and the implementation of best practice environmental management controls out-with the EIA regime.

5.3 As such, the Development is not considered to constitute EIA development.

5.4 In order to confirm this, we kindly request a formal EIA Screening Opinion on the requirement for EIA and would be grateful if RBB would respond by way of a formal EIA Screening Opinion within three weeks.

Appendix 1

Site Location Plan

Site Red Line Boundary

Contact Details

Enquiries

Visit us online
avisonyoung.com

Avison Young

65 Gresham Street, London, EC2V 7NQ