

Dear DP9,

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

Proposal: Screening Opinion as to whether an Environmental Impact Assessment is required for the proposed demolition of the existing buildings and structures on the two sites and construction of a new industrial complex comprising 5 units of various sizes totalling 14,998sq.m. of flexible light industrial (E(g)(iii)), general industrial (B2) and storage and distribution (B8) floorspace, including ancillary office space, and an affordable workspace building with a café (Class E) on the ground floor.

Site: Careys, land opposite Careys, Mcardle House, workshop office and car park, Great Central Way, Wembley

I write in connection to the application submitted for the above site on 04/11/2024 under planning reference 24/3106. The Council references Regulation 8 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations') "Applications which appear to require screening opinion". This states that where it appears an EIA screening opinion is required, paragraphs 5 and 6 of regulation 6 of the same act "Requests for screening opinions of the relevant planning authority", apply. Paragraph 5 regards the provision of sufficient material to determine a screening opinion, whilst paragraph 6 requires that a screening opinion must be adopted within the necessary timeframe (21 days).

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

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

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

Yours sincerely,



Paul Lewin
Spatial and Transportation Planning Manager

EIA SCREENING OPINION STATEMENT OF REASONS

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017

Description of proposed development – Screening Opinion as to whether an Environmental Impact Assessment is required for the proposed demolition of the existing buildings and structures on the two sites and construction of a new industrial complex comprising 5 units of various sizes totalling 14,998sq.m. of flexible light industrial (E(g)(iii)), general industrial (B2) and storage and distribution (B8) floorspace, including ancillary office space, and an affordable workspace building with a café (Class E) on the ground floor.

Site – Careys, land opposite Careys, Mcardle House, workshop office and car park, Great Central Way, Wembley

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

Introduction

The Council, under regulation 8 of the EIA regulations, has prepared a screening opinion on whether or not the proposed development at this site under planning application 24/3106 is considered to be EIA development. Given this was prepared under regulation 8, no environmental screening report has been provided to assist in this determination. As such, the Council has relied on the comprehensive material submitted to support application 24/3106. This includes the essential information required under regulation 6 paragraph 2, including a Plan of the land, a description of the development, and details around potential environmental impacts. As the submission has not been formally made under regulation 6, and therefore the applicant has not submitted an environmental screening report, an assessment of likely significant effects has not been undertaken. However, there remains sufficient material within the application for the Council to make a reasonable assessment to this effect, and therefore the material provided is considered to be sufficient.

The Existing Site and Surrounding Area

The site comprises 2.09ha of land within the Wembley Opportunity and Growth Area, and Strategic Industrial Location. The area is subject to significant redevelopment including at least 15,000 new homes and new commercial floorspace. The site is also located within close proximity to Neasden Stations Growth Area (~1km to the east) which is also the subject of significant redevelopment.

The site is located along Great Central Way, bisecting it into what will be referred to as the northern and southern sites. It is otherwise bounded by adjacent industrial land and the Brent River Park to the north and east, railway land to the south, and a multi storey car park, industrial land, and Fourth Way to the west.

The northern site comprises McArdle House which including a small office building and additional warehouse building with car parking to its east, and a service yard to its west. This site is predominantly hardstanding with limited built form. The southern site comprises Carey House similarly with associated parking and servicing yards. The southern site includes a greater quantum of built form including one smaller and one larger industrial units.

The site is accessed via Great Central Way, as well as Fourth Way. Great Central Way is the primary road off the North Circular Road which services the industrial area and the

Stadium which is ~400m to the west. In terms of public transport, the site achieves a Public Transport Accessibility Level (PTAL) of 2. To the south of the Chiltern Railway Line to the site's south are residential homes along Park View ~40m at their closest point. Otherwise, the site's surrounding built areas are of commercial use, primarily industrial. Two new self-storage developments have been consented along Fourth Way to the north and west of the northern site.

The site is adjacent to the River Brent which is a Grade I Site of Importance for Nature Conservation. The site predominantly comprises hardstanding and built form, including limited soft landscaping, with some incidental vegetation along its borders, and some intentional landscaping and screening vegetation on the southern site's boundary with Great Central Way. The river channel and its immediately adjacent banks are within Flood zones 2 and 3a for fluvial flooding. The site however is generally not located within these areas. The site is also designated as an Air Quality Management Area, with a portion of the site also residing within a Brent Air Quality Focus Area. The site does not include listed buildings and nor is it within a Conservation Area. The nearest listed building is the Grade II listed Wembley Arena.

The National Stadium's arch is subject to several protected viewing corridors. Given its proximity to the stadium, the site is within six of these corridors, including within the focused area of the following views: Great Central Way; South Way at the River Brent Bridge; Neasden Station. It is also sited within the 'setting' of the following views: The White Horse Bridge; Elmwood Park; and Horsenden Hill.

A sewer easement of 6m width also passes through the site from north to south, where built form cannot be placed.

The Size and Design of the Proposed Development

The application is for the proposed demolition of existing buildings and redevelopment to provide five flexible industrial buildings. This includes two blocks on the northern site, and three blocks on the southern site. The northern site includes the most substantial building (unit D) comprising 6,433sq.m. GIA floorspace, in addition to a standalone affordable workspace hub building at the junction of Great Central Way and Fourth Way, with a café on the ground floor, two floors above comprising 336sq.m. industrial floorspace. The southern site includes three buildings with the central building being split into two units. This site comprises 7,372 sq.m. GIA. Combined the sites will deliver 14,141 GIA of flexible industrial floorspace. This represents a significant uplift on existing 5,202sq.m. GIA.

All buildings are single storey with the inclusion of some mezzanine areas, with the exception of the affordable workspace hub, which is three storeys. Being industrial buildings, their scale is still significant being up to 18m in height, although they fall outside the definition of a tall building (30m+) in the borough. The site is considered to occupy a gateway location to the Stadium and Wembley Park from Great Central Way and therefore design in this prominent location is a key consideration. Scale and massing have primarily been informed by industrial occupier requirements, and site constraints including proximity to River Brent, location of the sewer easement, existing access arrangements, and protecting views to the Stadium.

Information Provided in Support of the Request for a Screening Opinion

As noted above, the applicant did not submit a screening request, and this opinion is being given under regulation 8 of the EIA regulations. Nevertheless, the supporting material associated with planning application 24/3106 is substantial, and sufficient to make a reasonable and detailed assessment of the site and its surroundings and the impact of the

proposed development to provide an EIA screening opinion, determining whether the site is EIA development.

Large Scale Development within the Vicinity

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

22/3965 1-4 and 9 Watkin Road, Wembley, HA9 0NL. Demolition of existing buildings and construction of two new buildings to provide commercial floorspace (Use Class: E) and student accommodation bedspaces (Use Class: Sui Generis), associated access and highways works, amenity space, cycle parking spaces, disabled car parking spaces and refuse/recycling stores. **Granted 23/02/2024. Under construction.**

23/0578 Olympic Way Office, 8 Fulton Road, Wembley, HA9 0NU. Demolition of existing building and erection of building for use as a purpose-built Further Education College Campus with associated plant at roof level, provision of hard and soft landscaping and cycle parking facilities, loading bay and accessible parking bays on Rutherford Road frontage and drop off bay on Fulton Road, subject to Deed of Agreement dated 14th March 2024 under Section 106 of Town and Country Planning Act, 1990 as amended **Granted 15/03/2024. Not started.**

17/3059 All Units, Stadium Retail Park, Wembley Park Drive & 128 Wembley Park Drive (Fountain Studios), HA9. Outline planning permission for demolition of existing buildings on site and provision of up to 85,000 sqm (Gross External Area, GEA) of new land use floorspace (across 1.679 ha) within a series of buildings, ranging from 8 to 25 storeys in height, with the maximum quantum as follows:

- A1 - A4 (Use class) Retail, B1 Office and/or D2 Leisure and Assembly: up to 4,000 sqm; and
 - C3 (Use Class) Residential: up to 57,000 sqm gross (approximately 680 units);
- And either:
- D1 (Use Class) Non-residential institutions: up to 25,000 sqm; or
 - A1 – A4 (Use Class) Retail, B1 Office and /or D2 Leisure and Assembly: up to 3,000 sqm; and C3 residential: up to 22,000 sqm; or
 - D1 (Use class) Non-residential institutions: up to 16,000 sqm; and Sui generis (Use class) student accommodation
 - up to 9,000 sqm; or C3 (Use class) Residential : up to 22,000 sqm (approximately 315 units)

Notwithstanding the above breakdown, the maximum quantum of floorspace by land use overall will always be 85,000 sqm GEA. No occupied residential or student living accommodation will be at ground level or below. **Granted 19/01/2021. Not started.**

15/5550 Olympic Way and land between Fulton Road and South Way including Green Car Park, Wembley Retail Park, 1-11 Rutherford Way, 20-28 Fulton Road, Land south of Fulton Road opposite Stadium Retail Park, land opposite Wembley Hilton, land opposite London Designer Outlet. Hybrid planning application, accompanied by an Environmental Impact Assessment, for the redevelopment of the site including:-

Full planning permission for erection of a 10-storey car park to the east of the Stadium comprising 1,816 car parking spaces of which 1,642 are for non-residential purposes, up to 82 coach parking spaces and associated infrastructure, landscaping and vehicular access. And Outline application for the demolition of existing buildings on site and the

provision of up to 420,000 sqm (gross external area) of new floorspace within a series of buildings comprising:

- Retail/financial and professional services/food and drink (Use Class A1 to A4) up to 21,000 sqm;
- Commercial (Use Class B1) up to 82,000 sqm;
- Hotel (Use Class C1): up to 25,000 sqm;
- Residential (Use Class C3): up to 350,000 sqm (up to 4,000 homes) plus up to 20,000 sqm of floorspace for internal plant, refuse, cycle stores, residential lobbies, circulation and other residential ancillary space;
- Education, healthcare and community facilities (Use Class D1): up to 15,000 sqm;
- Assembly and leisure (Use Class D2): 23,000 sqm;
- Student accommodation (Sui Generis): Up to 90,000 sqm.

And associated open space (including a new public park) and landscaping; car and coach parking (including up to 55,000 sqm of residential parking and 80,000 sqm non-residential parking) and cycle storage; pedestrian, cycle and vehicular accesses; associated highway works; and associated infrastructure including water attenuation tanks, an energy centre and the diversion of any utilities and services to accommodate the development.

Subject to a Deed of Agreement dated 23 December 2016 under Section 106 of the Town and Country Planning Act 1990, as amended. Planning Permission Granted 23rd December 2016. A number of elements of the outline application are complete and operational whilst others are yet to begin construction. The following Reserved Matters have been approved in relation to the Outline application above, and are either under construction or have not yet started:

24/1841 - Crescent House, 130-140 Wembley Park Drive - Demolition of the existing building and redevelopment of the site with a residential-led (Use Class C3) building with flexible commercial/community floorspace (Use Class E/F) at ground level; new basement excavation; cycle stores and blue badge parking; refuse stores and plant rooms/equipment; hard and soft landscaping including part-naturalisation of the Wealdstone Brook; new play space; and all associated engineering and ancillary works. Further explanation (not forming part of the formal description of development set out above): The proposed development includes the construction of two linked buildings of 18-storeys and 31-storeys to provide 307 residential dwellings (Use Class C3). The development proposes 179sqm (GIA) of commercial floorspace (Class E) and 216sqm (GIA) of flexible commercial/community floorspace (Classes (E/F2)). Basement accommodation is proposed for plant and cycle storage. **Granted 11/12/2024 subject to completion of S106 legal agreement.**

20/0967 – Wembley Park Station Carpark and Train Crew Centre - Comprehensive mixed-use redevelopment of the site comprising the phased demolition of the existing buildings and structures on site and the phased development comprising site preparation works, provision of five new buildings containing residential uses, replacement train crew accommodation and flexible retail floorspace, basement, private and communal amenity space, associated car parking (including the part re-provision of station car parking), cycle parking, access and servicing arrangements, refuse storage, plant and other associated works and subject to a Deed of Agreement dated 13 October 2021 under Section 106 of the Town and Country Planning Act 1990, as amended. **Granted – 22/02/2022 – three blocks completed, two not yet constructed.**

21/2517 – Land to the east of Rutherford Way (plot NE02) and phase 1B of the northern park, Wembley - Reserved matters application in relation to hybrid planning permission 15/5550 (as amended by planning permissions 17/0328, 18/2214 and 20/2844) for the access, appearance, landscaping, layout and scale for Plot NE02 comprising the construction of two buildings, ranging from 10 to 27 storeys in height, providing residential units with private communal residential landscaped gardens and terraces, and commercial

floorspace as well as associated plant, cycle storage, refuse provision, other residential ancillary space and associated infrastructure and public realm including new pedestrianised estate roads, works to Rutherford Way including provision of parking and loading bays and Phase 1B of a new public park comprising the installation of hard and soft landscaping, informal play space, lighting and other associated works. – **Granted 22/10/2021 – Under construction but soon to complete.**

21/2424 - Land to the east of Rutherford Way (plot NE03) and phase 1B of the northern park, Wembley. Reserved matters application in relation to hybrid planning permission 15/5550 (as amended by planning permissions 17/0328, 18/2214 and 20/2844) for the access, appearance, landscaping, layout and scale for Plot NE03 comprising the construction of two buildings, ranging from 10 to 21 storeys in height, providing residential units with private communal residential landscaped gardens and terraces, and commercial floorspace as well as associated plant, cycle storage, refuse provision, other residential ancillary space and associated infrastructure and public realm including new pedestrianised estate roads, works to Rutherford Way including provision of parking and loading bays and Phase 1A of a new public park comprising the installation of hard and soft landscaping, a bandstand, a water feature, informal play space, lighting and other associated works. **Granted 22/10/2021 – Under construction but soon to complete.**

23/3440 - 1-22 Brooke Avenue Wembley - Demolition of all buildings and structures and comprehensive redevelopment of the site to provide two linked blocks of between 6 and 15 storeys (including mezzanine storey) comprising large scale purpose built shared living (LGPBSL) units (sui generis) and two linked blocks of between 4 and 9 storeys comprising residential units (Use class C3), ground floor commercial/community use units (Use class E/F), ancillary facilities and shared internal and external amenity space, associated highway works, blue badge parking, cycle parking, refuse stores, landscaping and access arrangements. **Granted 16/10/2024 – Not started.**

21/2989 – Euro House, Fulton Road - Demolition and redevelopment of the site to provide erection of five buildings ranging from ground plus 14 to 23 storeys; comprising residential units, retail floorspace and workspace / storage floorspace, private and communal amenity space, car parking, cycle parking, ancillary space, mechanical plant, landscaping and other associated works (phased development), subject to a deed of agreement dated 24/03/2022 under Section 106 of the Town and Country Planning Act 1990. APPLICATION SUBJECT TO AN ENVIRONMENTAL STATEMENT. **Granted – 25/03/2022 – One block completed, the remainder under-construction.**

18/4767 – Access Storage, First Way - Demolition of the existing building and erection of 5 buildings ranging from 10 to 24 storeys comprising 7,307 sqm of self-storage space (Use Class B8), 1,335 sqm of office space (Use Class B1) and 280 sqm of retail space (Use Class A1/A3) at ground, first and second floor levels, 555 residential units (Use Class C3) on the upper levels, new landscaping and public realm, ancillary servicing and plant, car and cycle parking, and associated works. **Granted - 30/03/2023 – Not started.**

21/2130 – Olympic House, 3 and Novotel, 5 Olympic Way - Demolition of existing building at 3 Olympic Way and erection of 3 buildings of basement, ground and 9, 22 and 25 storeys (excluding rooftop plant) to provide 178 residential units (Use Class C3), new hotel accommodation comprising 260 rooms (Use Class C1) and a retail food store (Use Class E). 6-storey extension to existing hotel at 5 Olympic Way to provide 95 additional hotel rooms (Use Class C1) and amenities, extension of ground floor to create new colonnade and public realm improvements to Olympic Way. Other works associated with development include new access from North End Road, disabled car parking, cycle parking, private and communal

amenity spaces, public realm works and other associated works – **Granted 23/05/25 – Not started.**

Other Environmental Assessments

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

Development Plan

The Brent Local Plan (2019 – 2041) was adopted at Full Council on the 24th February 2022 and is the key strategic document to guide and manage development in the borough. The development plan also comprises the West London Waste Plan (2015) and the London Plan (2021). Together these documents provide spatial policies, development management policies and site allocations to guide and manage development in the borough.

An Integrated Impact Assessment (IIA) accompanies the Local Plan, which incorporates the SA and SEA – that consider the potential for significant economic, social and environmental effects. This document has been considered when generating the EIA Screening Opinion. The SAs satisfied the requirements of the EC Directive 2001/42/EC and Strategic Environmental Assessment (SEA) Regulations on the assessment of the effects of certain plans and programmes on the environment.

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

Legislation

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

'Schedule 2 development' means development (other than exempt development – which this is not) of a description mentioned in Column 1 of the table in Schedule 2 where:

- a) any part of that development is to be carried out in a sensitive area; or
- b) any applicable threshold or criterion in the corresponding part of Column 2 of that table is respectively exceeded or met in relation to that development.

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

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

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

The proposal is for the development of a site of over 1ha in size, comprising 2.06ha of land. The Council is therefore providing a screening opinion under regulation 8 of the EIA regulations. Therefore, consideration has been given to whether the proposed development may give rise to significant environmental effects, such that an EIA may be required.

Likely Significant Effects

The ultimate stage in the screening process is to consider whether it is '*likely to have significant effects on the environment by virtue of factors such as nature, size or location*'. As

required by regulation 5(4)(c), where a relevant planning authority has to decide whether Schedule 2 development is EIA development, they must take into account the selection criteria set out in Schedule 3 as are relevant to the development.

The Council has taken into account the selection criteria set out in Schedule 3, where relevant to the proposed development. This includes the characteristics of the development, the environmental sensitivity of geographical areas likely to be affected, and the likely significant effects in relation to these criteria, with regard to the factors specified in regulation 4(2) and taking into account the types and characteristics of the potential impact listed in paragraph 3.

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

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

Appendix A – Consideration of Likely Significant Effects

Air Quality

The site is located within the Brent Air Quality Management Area (AQMA), and partially within an Air Quality Focus Area (AQFA). The majority of Brent has been designated as an AQMA, and therefore even small increases in emissions can lead to adverse effects. The AQMA has been declared for exceedance of the annual mean national objective for nitrogen dioxide (NO₂) and the 24 hour mean national objective for particulate matter (PM₁₀). Brent has a total of 21 AQFA's, incorporating the 11 identified by the London Mayor in addition to 10 further sites identified by the Council. These are designated in locations that not only exceed the EU annual mean limit value for nitrogen dioxide (NO₂), but are also locations with high human exposure, such as within and around the residential areas of the Wembley Growth Area.

There are a number of sensitive receptors near the proposed development site, including residential properties and businesses.

Documentation Accompanying the Planning Application: *An Air Quality Assessment (including Air Quality Positive Statement)* has accompanied the application.

Construction

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

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

Whilst there is the potential for adverse effects, with the implementation of standard best practice measures, it is not anticipated that the effects would be significant. The accompanying Air Quality Assessment identifies that overall the effect during construction will be not significant. This will be achieved via the implementation of a Dust Management Plan. Taking account of these practices the effect of dust soiling and PM₁₀ is likely to be reduced to negligible with the implementation of appropriate mitigation measures. These may include: No idling vehicles; Erect solid screens or barriers around dusty activities or the Site's boundary; Loads entering and exiting the Site are covered; Where practicable use mains or battery powered generators over fuel burning; Other dust suppression measures e.g. damping down with water; and all constructions vehicles and equipment to comply with relevant EU stage ratings.

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

Operation

The accompanying Air Quality Assessment notes that the development will be at least Air Quality Neutral, and demonstrates measures which will be taken to improve this to Air Quality Positive.

Air quality emissions during operation will be from new traffic generation and heating systems. Heat and hot water are to be provided via an all-electric system, and therefore such emissions will be absent on-site. 21 car parking and 8 van bays are proposed which is a significant reduction below existing. Additionally EV charging spaces will also be provided, as well as a significant number of cycle parking spaces (78 long stay, and 26 short stay), further reducing potential emissions from vehicles from the new workforce. The proposal also includes a BREEAM Travel Plan which will further encourage the use of more sustainable transport modes. Parking controls are likely to be increased in the surrounding area to deal with potential displacement off-site. This, along with measures to support walking, cycling and public transport is likely to reduce private car use. A delivery and servicing plan has been submitted to ensure servicing is effective. The plan identifies that the existing site generates 109 trips, whereas the proposed site is projected to generate 171 trips. Taking this into account the level of net traffic generation resulting from this development is likely to be small and in the context of movements on the adjacent road network, unlikely to result in significant impacts. As such emissions from vehicle movements will be small, and therefore effects are not considered to be significant.

Mitigation

Air Quality Positive development, which achieves 'at least air quality neutral' is proposed. During the construction phase a Dust Management Plan will be implemented which implements suitable measures to reduce the impact of dust and emissions. This can be secured via planning conditions.

The applicant has considered the potential impact of air quality and dust on occupational exposure standards (to minimise worker exposure) and breaches of air quality objectives that may occur outside the site boundary, such as Non-Regulated Mobile Machinery (NRMM). Continuous visual assessment of the site should be undertaken and a complaints log maintained in order determine the origin of a particular dust nuisance.

The supporting statement advises that the proposal is not anticipated to have any negative effect on Air Quality. Suitable conditions associated with the Transport Statement and measures to reduce reliance on the private car, for example through provision of sufficient cycle parking and potential S106 contributions to implementing a wider controlled parking zone will ensure reductions in impact through vehicle movements.

Local Heritage

Documentation Accompanying the Planning Application: *A Heritage, Townscape and Visual Impact Assessment has been provided.*

The site does not lie within or near a Conservation Area or an Archaeological Priority Area. No listed buildings are within close proximity to the site. The closest scheduled monument to the Site is a 'Medieval moated site, 454 m south-west of Sudbury Golf Club House', which is approximately 3.2 km to the south west of the site. The scale of the proposed development is not such that it would have an increased zone of impact and therefore consideration of only immediate assets is required in terms of heritage. Brent River Park adjacent to the site is a locally listed park. The park has been conserved and not encroached into. The park will benefit slightly from the landscaping associated with the development but this is not considered to be significant. It is also close to the National Stadium Wembley which is subject to Local Plan policies seeking to protect longer distance views to it and in particular its arch. This will be discussed further in the townscape and visual impact section below.

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

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

Climatic Factors

Documentation Accompanying the Planning Application: A sustainability statement, covering key themes including energy, transport, drainage, water, waste, air quality, ecology, noise and BREEAM, has been submitted. Energy is addressed in detail via an Energy Statement.

Construction

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

Operation

The Energy Statement notes that the development achieves a 105% reduction in regulated emissions. These are achieved via being lean (21.84% reduction) and be green (83.16% reductions). This includes using a fabric first approach on a thermally effective building envelope, and via the provision of an all electric heating and cooling strategy with heat pumps and heat recovery, plus the use of a rooftop PV array. A BREEAM score of 'outstanding' is also targeted. The effects of which are beneficial, but are not considered to be significant. 21 car parking and 8 van bays are proposed which is a significant reduction below existing. Additionally, EV charging spaces will also be provided, as well as a significant number of cycle parking spaces (78 long stay, and 26 short stay), further reducing potential carbon emissions from vehicles from the new workforce. The proposal also includes a BREEAM Travel Plan which will further encourage the use of more sustainable transport modes. Parking controls are likely to be increased in the surrounding area to deal with potential displacement off-site. This, along with measures to support walking, cycling and public transport is likely to reduce private car use. A delivery and servicing plan has been submitted to ensure servicing is effective. The plan identifies that the existing site generates 109 trips, whereas the proposed site is projected to generate 171 trips. Taking this into account the level of net traffic generation resulting from this development is likely to be small and in terms of carbon generation/ greenhouse gases small and therefore effects are not considered to be significant.

Mitigation

A CEMP should be secured that includes measures to reduce emissions e.g. management of plant to prevent plant running when not in use. Suitable conditions associated with the Transport Statement and measures to reduce reliance on the private car, for example through provision of sufficient cycle parking and potential S106 contributions to implementing a wider controlled parking zone will ensure reductions in carbon emissions impacts through

vehicle movements. A delivery and servicing plan has been submitted to ensure servicing is effective.

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

Contaminated Land

Documentation Accompanying the Planning Application: *a contaminated land assessment, and Phase 2 Instructive Ground Investigation has been provided.*

The Contaminated Land Assessment revealed that there is potential for impact to groundwater and soil based on the historic railway and service yard uses. As a result a Phase 2 Instructive Ground Investigation has been undertaken. This concludes that further work is required regarding inspection of the northeast of the site which is anticipated to be secured via a pre-commencement condition. This is considered to be sufficient to ensure any potential impacts to groundwater and soil are mitigated and therefore effects are unlikely to be significant to warrant EIA.

Construction

During construction there is considered to be a low likelihood of fuel leakages / spills from construction vehicles. A CEMP would be implemented to manage potential effects. In addition, there is the risk of exposure to contaminated materials and opening up pathways to underlying substrata. Standard mitigation measures will be required during the construction of the proposed development, to ensure that the works are undertaken in an appropriate manner. These should be secured through conditions in agreement with the Council's Contaminated Land Officer. With the implementation of these mitigation measures, no significant effects are considered likely.

Operation

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

Mitigation

Standard construction mitigation measures should be secured through the CEMP and through conditions in agreement with the Council's Contaminated Land Officer. A comprehensive contamination assessment will be undertaken as part of the planning application to ensure any significant effects arising from contamination are mitigated.

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

Daylight, Sunlight and Overshadowing

Documentation Accompanying the Planning Application: *Given proximity of the proposed development to neighbouring sensitive receptors, such as residential homes south of the railway lines, the Council has agreed that a daylight and sunlight assessment was not required.*

Construction

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

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

The erection of the new buildings will generate some adverse effects as it is built out. The construction effects will however be no greater than the completed, operational development, which are not considered to be significant.

Operation

The operation of the proposed development will introduce buildings of up to 18m high. Given the limited scale of the proposed development, its proposed high design quality, and distance from sensitive receptors, its siting on an existing industrial site within a wider industrial location, the limited impacts of the proposed development are not considered to be significant.

Mitigation

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

Biodiversity (including flora and fauna)

Documentation Accompanying the Planning Application: *A preliminary Ecological Assessment and Biodiversity Net Gain assessment have been provided.*

The site is predominantly hardstanding, with limited areas of soft landscaping limited to incidental planting. The report concludes that the existing buildings are of negligible value for roosting bats. Where possible, existing habitats of any merit are being retained and enhanced. The BNG report identifies a 111% net gain given the limited existing provision. This is provided using a number of provisions including wildflower meadows, trees, green roofs, green walls and hedgerows. Bat and bird boxes are also proposed. The site is adjacent to Brent River Park Grade I SINC. This proposal will to some extent benefit the SINC, but this is not considered to be significant.

The site contains no areas of statutory nature conservation and there are no such sites within the immediate vicinity of the site. There are no SPA, SAC or Ramsar designations within 5km of the site. There is a single SSSI within 5km of the Site, namely Brent Reservoir SSSI, approximately 1.5 km north-east of the site. Masons Field (Fryent Country Park) Local Nature Reserve (LNR) is approximately 1 km to the north of the Site and Brent Reservoir / Welsh Harp LNR is approximately 1.5 km to the north-east of the Site. Fryent Country Park LNR consists of meadows, ponds, lakes, hedges and woodland. Brent Reservoir / Welsh Harp LNR consists of open water, marshes, trees and grassland and the reservoir includes associated waterfowl. Last assessed on 20th March 2019, Brent Reservoir was identified as being in favourable condition, having a good breeding bird assemblage on the open water and fen habitats across the site.

Construction

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

The application site is adjacent to a water course, the Grade I Brent River Park SINC. There is a potential risk of water contamination from run off during demolition and construction. The potential for contamination risk should be dealt with through the implementation of appropriate mitigation in the demolition and construction phase (to be secured by standard planning condition). It is not considered that the construction of the proposed development will have a significant effect on the integrity of statutory or non-statutory nature conservation designations or protected species and the potential for conservation requirements and objectives would not be diminished.

Operation

As the existing land comprises warehouses and hard surfacing, there is the potential for the proposed development to beneficially contribute to biodiversity of the local area through the implementation of ecological enhancement measures. Supporting information states that the proposals will include an uplift in ecological benefits through the soft landscaping proposals compared to the existing situation.

Mitigation

Suitable conditions should be in place to ensure potential adverse impacts on any existing protected species are minimised during prior to and during works on site, as well as incorporation of suitable features to encourage bio-diversity resources as part of the development. The potential for contamination risk should be dealt with through the implementation of appropriate mitigation in the demolition and construction phase (to be secured by standard planning condition). Mitigation measures and compliance with regulatory waste disposal controls and hazardous material management would be set out in a CEMP.

The Council's Ecology Officer has provided a representation on the application. This includes a range of mitigative measures which should be secured via condition/S106 in order to ensure the adjacent SINC is not compromised and the site helps to improve overall biodiversity. These are considered beneficial but not essential to ensure the site does not have significant impacts in regards to EIA.

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

Flood Risk

Documentation Accompanying the Planning Application: *A detailed Flood Risk Assessment and Drainage Strategy has been provided.*

The site is located directly to the west of the River Brent. By virtue of the sites level relative to the river channel, it is not within either Flood Zones 2 or 3 for fluvial flooding. The FRA attributes low flood risk to all flooding types with very low risk attributed to fluvial in particular. A low to medium is attributed to surface water flooding, although it is noted that a new drainage regime will be implemented which will reduce this potential and not increase the risk of flooding, although this is not considered significant.

Construction

Flood risk on site is low for all types and therefore the risk during construction will also be low.

Operation

The scheme has made use of Sustainable Urban Drainage Systems (SuDS) incorporating attenuation tanks and permeable paving where possible to achieve minimum 96% reduction in existing discharge rates with a peak flow rate of 2l/s. Flood risk is therefore low and will be reduced with limited risk during operation and therefore impacts are not considered to be significant to warrant EIA.

Mitigation

The development must be located and designed so as not to increase risk of flooding. Any potential significant effects can be mitigated through mitigations such as planning conditions or a S106 agreement. Implementation and management of surface water run-off should be secured through a planning condition, and a detailed drainage plan must account for 100% of surface water generated from the site in a 1 in 100 +40% climate change event and comply with London Plan policy and non-statutory technical standards for SuDs.

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

Human Health

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

Land (land take)

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

Material Assets

The construction and operation of the proposed development will utilise material assets, but given the scale of the development this is not considered to be substantial. As such, significant effects are not considered to be likely. The applicant has submitted a Circular Economy Statement noting that the applicant will follow the waste hierarchy to reduce waste and promote reuse and recycling. Other measures to reduce waste are also to be taken including during operation. No discipline specific mitigation has been relied upon for the EIA Screening Opinion.

Major accidents and/or disasters

Documentation Accompanying the Planning Application: *A Fire Statement has been submitted.*

A fire statement has been submitted demonstrating compliance with London Plan policy D12 on fire safety which has been considered throughout the design development.

It is considered that the risk from major accidents and/or disasters (both of existing and new receptors) has been appropriately considered within the relevant topic sections (e.g. climate change, flood risk) and as such reference should be made to these sections as required. Significant impacts are not considered to be likely to warrant EIA.

Noise and Vibration

Documentation Accompanying the Planning Application: *A Noise Assessment has been submitted.*

The existing roads bordering the site and nearby railway line (~140m to the north) currently are dominant sources of noise in the area. Moderate levels of noise from the adjacent light industrial uses (including a vehicle repair shop) is also possible, and elevated levels of noise and activity likely during major sporting / cultural events. During the evening / night time hours, noise might also be influenced by the evening leisure economy. The site occupies a Strategic Industrial Location where 24hr operation is not to be compromised, and therefore some day round noise is expected.

Construction

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

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

Operation

Parking is significantly reduced below existing. There will also be deliveries as well as waste removal, but in an urban context the impacts will be limited. As such, there is not considered to be any significant effects from traffic noise.

The accompanying Noise Assessment concludes that the proposed flexible uses can be accommodated without causing unacceptable impacts to neighbouring sensitive uses, subject to necessary mitigation measures to be secured via condition.

No significant effects are therefore anticipated.

Mitigation

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

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

Socio-Economic (including population)

Documentation Accompanying the Planning Application: *The Planning Statement makes reference to the number of jobs to be generated by the proposed development.*

Construction

The proposed development would create benefits to local employment though providing temporary employment during construction, with an associated increase in spending in the local and regional area. This is considered to be beneficial, but not significant.

Operation

The proposed development of nearly 15,000sq.m. of industrial floorspace would create benefits to local employment though providing permanent employment once operational. This is noted to be up to 373 new jobs if occupied as B2 floorspace, or 192 if B8.

Mitigation

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

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

Soil (organic matter, erosion, compaction, sealing)

Construction

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

Operation

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

Mitigation

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

Telecommunications

Documentation Accompanying Planning Application: Given the limited scale of the proposal no discipline specific documentation has been required.

The massing of the site is broken up with scale up to 18m high. For larger scale developments in the area effects have been found to be unlikely. A TV / Radio Reception Assessment was submitted for nearby development at 1-4 & 9 Watkin Road site under 20/0587 which is of a substantially greater scale. This found that interference to the reception of TV or radio services was unlikely. The proposal is smaller in scale and massing than the adjacent development. As such, on the basis of information provided with other sites in the vicinity the impact is not to be significant.

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

Townscape and Visual Impact

Documentation Accompanying the Planning Application: *A Townscape and Visual Impact Assessment as submitted with the application. The National Stadium is subject to local policy for protection of views to it from various locations across the borough.*

Construction

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

Operation

As noted above, the site is within a number of protected viewing corridors of Wembley Stadium. Notably, it is within immediate proximity of the viewpoint of the protected view sited along Great Central Way, where the viewpoint is situated on the bridge over the River Brent. The proposal notes that there will be an impact on this view. The TVIA identifies that the largest unit, Unit D in the northern portion of the site, will obscure the remaining view of the arch from this viewpoint. It is noted however that this is a kinetic viewpoint, which provides a sense of arrival for those travelling by vehicle and coming off of the North Circular Road and onto Great Central Way. The applicant has considered all possible massing and scaling options for this site, and this is the only viable option. Given the proposed impact is only experienced for a small period during the kinetic viewpoint, on a singular protected viewing corridor, impacts are not considered likely to be significant to warrant EIA.

Mitigation

During construction, ensure the erection and maintenance of hoarding. Design, height and massing to reduce potential for adverse impact, can be taken into full account at application stage.

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

Traffic and Transport

Documentation Accompanying the Planning Application: *A Transport Statement, including Healthy Street Assessment, BREEAM Travel Plan, and Delivery and Servicing Plan have been submitted with the planning application.*

Construction

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

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

Operation

The Healthy Street Assessment demonstrates that the proposal will provide significant improvement to the Great Central Way and Fourth Way frontages. This includes bus stop relocations, pavement widening and general landscaping improvements. The proposal also results in a substantial reduction in on-site parking, from 200 to 21 spaces, plus 8 van and 5 LGV bays. This is within the maximums allowed by the London Plan. Given the limited parking on site the Transport Assessment concludes that 60% of staff trips generated will be undertaken via sustainable modes. This will be furthered by the implementation of the supporting Travel Plan.

A delivery and servicing plan has been submitted to ensure servicing is effective. The plan identifies that the existing site generates 109 trips, whereas the proposed site is projected to generate 171 trips. This is identified as being negligible when compared with current traffic flows on Fourth Way and Great Central Way, where the proposal will increase flows by up to 1.7% and 1.5% respectively at peak times. Given the proposed industrial use, with a storage and distribution bent, the proportion of trips taken by HGVs is large, with 54 projected daily trips. Given the existing use and the proposed uplift in traffic flows on the host roads, this is not considered likely to be significant as to warrant EIA.

Mitigation

A CLP should be secured that includes standard mitigation measures to control transport movements (potentially as part of the CEMP).

A Travel Plan is being secured to ensure all is done to promote sustainable transport modes are used.

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

Waste

Documentation Accompanying the Planning Application: *An Operation Waste Management Plan has been submitted.*

Construction

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

Operation

Commercial waste is covered under the same legislation as construction waste, above. The submitted Operational Waste Management Plan follows the waste hierarchy. This aims to ensure 65% of municipal waste is recycled. The plan also seeks to ensure waste is stored and collected safely, and reduced the overall waste produced.

If the application is approved, the decision notice should include suitable conditions to ensure that waste facilities for businesses are provided prior to occupation. No significant effects are anticipated.

Mitigation

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

Water Quality (hydro morphological changes, quantity and quality)

Documentation Accompanying the Planning Application: *This matter will be addressed in a number of areas, Flood Risk Assessment / Drainage Statement, Land Contamination Assessment and the CEMP.*

The site is adjacent to a watercourse, the River Brent with potential for run-off direct from the site via non-formal pathways, or via the surface water drainage network. In addition, the site has historic industrial use with potential for various compounds that could adversely affect water quality such as hydrocarbons within the ground if disturbed.

Construction

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

Operation

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

Mitigation

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

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

Wind

Documentation Accompanying the Planning Application: *No discipline specific documentation has been provided by virtue of the developments low scale.*

Construction

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

Operation

The operation of the proposed development will introduce new buildings onto the site up to 18m in height. Therefore, there may be adverse effects on the existing wind conditions, although the proposed scale of development is insignificant when compared with other development in the area. The scale is such that it is not affected by wind streams which are present at higher altitudes, where wind speed typically increases with altitude. The development is also broken into a number of units, providing breaks in the massing to reduce impacts of channelling. As such it is not anticipated that the environmental effects will be of such significance to warrant EIA.

Cumulative Effects

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

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

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

The Council has considered a wide area consisting of the Wembley masterplan area and other development sites adjacent or within the vicinity, particularly those that might generate transport movements along Fourth Way and Great Central Way. Three of the applications identified (15/5550 – Wembley Masterplan; 14/4931 – Land Surrounding Wembley Stadium Station; and 21/2989 & 20/2033 – Euro House) as part of the cumulative assessment were subject to Environmental Impact Assessments. The Council has considered the information contained within this assessment related to the individual impacts and also the associated cumulative impacts of the proposals. The majority of these schemes are currently under construction, and are likely to have largely completed prior to the commencement of works at this site. Adjacent identified sites, such as the remainder of BCSA6 and the wider Wembley Masterplan area, will likely be subject to additional applications in the near future. The proposed scheme is to some extent separated from these schemes and is not within their immediate proximity. Therefore whilst they serve as the closest possible local comparable, their form and uses are typically residential, and are separated from the proposed site therefore making some of the conclusions for immediate impacts less pertinent. They do however provide a basis for determining what kind of development can

result in likely significant impacts so as to provide a baseline for determining the potential cumulative impacts for the proposed development which is useful.

Demolition/Construction

The Environmental Statement (ES) submitted with 21/2989 (Euro House) notes possible major adverse cumulative effects in relation to noise and vibration, due to construction noise. It is noted that since the ES was produced in July 2021, that whilst a number of new applications have been granted, many of the cumulative schemes considered, are soon to, or have completed since the baseline assessment for Euro House Environmental Statement was undertaken. The situation is therefore likely to have remained similar, or have improved in terms of cumulative noise and vibration impacts. Such impacts in any case can be mitigated through appropriate management such as through the CEMP, and would be temporary.

The Environmental Statements submitted with 15/5550 and 14/4931 both notes some potential adverse cumulative effects during construction (townscape, heritage and visual assessment, dust and dirt (in relation to transport and accessibility) and air quality), but these can be mitigated through site management, ensuring plans are coordinated, adequate pollution prevention measures. It is also noted that the development proposed under 14/4931 is in any case now completed and is located further away from this subject site than the other schemes.

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

It is also assumed that the enabling works, demolition and construction phases associated with the other development schemes would adhere to legislative requirements, industry guidance and best practice as will be the case within the application sites. However, there remains the potential for cumulative effects to arise, particularly with respect to dust and noise.

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

Operation

The Environmental Statement submitted with 21/2130 (Euro House) notes a potential moderate adverse impact in relation to overshadowing on the Wealdstone Brook, and a potential adverse impact in relation to climate change (greenhouse gas emissions as a result of 'in use' emissions associated with operational energy consumption and transport related emissions). However, the statement explains that all greenhouse gases are considered to be insignificant and with the incorporation of mitigation, it is anticipated that emissions will be minimised over time. In relation to potential cumulative effects, moderate to major adverse impacts are possible in relation to loss of daylight to Kelaty House, major adverse impacts in relation to plot NE04 of the Wembley Masterplan in terms of loss of daylight, and potential moderate adverse impacts in terms of overshadowing on the Wealdstone Brook.

The proposal is however of a lower scale and set away from the more intensive development of the central Wembley Park area. As such, it does not impact directly upon neighbouring residential receptors, and its scale provides more limited overshadowing of adjacent blue/green infrastructure. In cumulative terms, its impacts are more separate from those of the more densely developed masterplan area, with the site representing a gateway to the masterplan area, being located on its less dense, and larger grained industrial edge.

The Environmental Statement for Euro House states that although this section of the Wealdstone Brook would receive increased shading as a result of the development, it would still receive sunshine at different times of the day and through the year. In addition, the brook is proposed to benefit from ecological enhancements and a new habitat suitable for the resultant daylight conditions. This similarly applies to the subject site.

In terms of potential negative cumulative impacts in relation to the Environmental Statement for 15/5550, the statement notes that there will be an increase in water demand and capacity for foul drainage and that dialogue with Affinity Water and Thames Water will ensure no significant cumulative impacts. Without mitigation, the scheme would result in significant adverse effects on the capacity of existing infrastructure, but these would be mitigated through on-site provision and physical provision funded by CIL contributions. In terms of air quality, operational effects of the development proposed by 15/5550 were found to be insignificant. Meanwhile, the Environmental Statement associated with 14/4931 notes a potential minor adverse impact when assessing cumulative impact in relation to public transport networks. It is noted that the majority of schemes considered in the cumulative development schedule for this environmental statement have completed.

With regards to the matters considered in this opinion it is not considered that there will be significant adverse cumulative operational effects when the cumulative developments and the proposed development are operational.

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