Request for a Screening Opinion

Hannah Close, Wembley

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SLR Project No.: 416.066410.00001

Client Reference No: 085770

25 September 2025

Revision: 3

Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
1	15 August 2025			
2	28 August 2025			
3	25 September 2025			

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Table of Contents

Tables in Text

Plates in Text

Appendices

Acronyms and Abbreviations

Abbreviation	Definition
AADT	Annual Average Daily Traffic
AAE	AA Environmental
AOD	Above Ordnance Datum
AONB	Area of Natural Beauty
APA	Archaeological Priority Area
AQFA	Air Quality Focus Area
AQMA	Air Quality Management Area
ASR	Air Quality Annual Status Reports
AURN	Automatic Urban Monitoring Network
BGS	British Geological Survey
BRES	Business Register and Employment Survey
BSI	British Standards Institution
CEMP	Construction Environmental Management Plan
CIEEM	Chartered Institute of Ecological and Environmental Management
CITB	Construction Industry Training Board
COMAH	Control of Major Accident Hazards
COSHH	'Control of Substances Hazardous to Health
CRTN	Calculation of Road Traffic Noise
CTMP	Construction Traffic Management Plan
Defra	Department for Environment, Food and Rural Affairs
EA	Environment Agency
ECoW	Ecological Clerk of Works
EIA	Environmental Impact Assessment
EPUK	Environmental Protection UK
ES	Environmental Statement
FRA	Flood Risk Assessment
FTE	Full Time Equivalent
GCN	Great Crested Newt
GEA	Gross External Area
GIA	Gross Internal Area
GIGL	Greenspace Information for Greater London
GLHER	Greater London Historic Environment Record
GLTA	Ground Level Tree Assessment
HDV	Heavy-Duty Vehicles
IAQM	Institute of Air Quality Management
INNS	Invasive Non-Native Species
IRZ	Impact Risk Zone
LAEI	London Atmospheric Emissions Inventory

Abbreviation	Definition
LGV	Light Goods Vehicles
LERC	Local Environmental Records Centre
LEZ	Low Emission Zone
LLAQM	London Local Air Quality Management
LNR	Local Nature Reserve
LPA	Local Planning Authority
MAGIC	Multi-Agency Geographic Information for the Countryside
NHLE	National Heritage List for England
NPPF	National Planning Policy Framework
NRMM	Non-Road Mobile Machinery
OPA	Outline Planning Application
PAH	Polycyclic Aromatic Hydrocarbons
PEA	Preliminary Ecological Appraisal
PMoW	Precautionary Methods of Work
PPG	Planning Practice Guidance
PRA	Potential Roost Assessment
PRF	Potential Roosting Features
PTAL	Public Transport Accessibility Level
RHS	Royal Horticulture Society
ROMP	Review of Minerals Permissions
RTD	River Terrace Deposits
SAC	Special Areas of Conservation
SGV	Soil Guidance Values
SIL	Strategic Industrial Location
SINC	Sites of Importance for Nature Conservation
SPA	Special Protection Area
SPZ	Source Protection Zones
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage System
TCA	Townscape Character Areas
TfL	Transport for London
TPH	Total Petroleum Hydrocarbons
ZTV	Zone of Theoretical Visibility

1.0 Introduction

SLR Consulting was commissioned by British Land Properties Ltd.(the 'Applicant') to assist Brent Council in determining whether proposals for a mix of Strategic Industrial Land (SIL) uses including industrial, logistics, data centre and waste facility development (the 'Proposed Development') at land at Units 2-4 Hannah Close, Wembley (the 'Application Site'), would require an Environmental Impact Assessment (EIA) as defined within the Town and Country Planning (Environmental Impact Assessment Regulations) 2017 (as amended) (the 'EIA Regulations').

Whilst screening is not a mandatory step in the EIA process, the EIA Regulations provide an opportunity for an Applicant to request the formal opinion of the Local Planning Authority (LPA) (a 'Screening Opinion') on whether the Proposed Development is likely to result in significant environmental effects, and as such would be considered to be 'EIA Development' and require the submission of an Environmental Statement (ES) as part of any future planning application.

This Request for a Screening Opinion makes appropriate reference to the criteria set out in Schedule 3 of the EIA Regulations, and the clarifications given in the EIA Planning Practice Guidance (May, 2020)[1].

In accordance with the procedure set out in the EIA Regulations, this Request for a Screening Opinion includes the following information:

- a plan sufficient to identify the land (**Figure 1, Appendix A**);
- a description of the location of the development, with particular regard to the sensitivity of the geographical areas likely to be affected (**Section 2.0** of this Request);
- a description of the development, including its physical characteristics (**Section 3.0** of this Request);
- a description of the aspects of the environment likely to be significantly affected by the development (**Sections 4.0 and 5.0** of this Request);
- a description of the likely significant effects of the development on the environment resulting from expected residues and emissions, and the use of natural resources (**Section 5.0** of this Request);
- 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 (**Sections 4.0, 5.0 and 6.0** of this Request).

[1] UK Government. (n.d.) Environmental impact assessment: guide. Available at: https://www.gov.uk/guidance/environmental-impact-assessment (Accessed: 14 August 2025).

2.0 Application Site and Surrounds

2.1 Description of the Application Site

The Application Site covers an area of approximately 5.22ha and is located to the east of the wider Wembley Masterplan area, which has undergone extensive development and regeneration over recent years. It lies within the designated Wembley SIL and is identified on the Brent Policies Map with part of the Application Site identified for safeguarded waste uses. A Site Location Plan is shown in **Figure 1, Appendix A**.

The Application Site currently comprises of three existing industrial units:

- Unit 2 (11,845.30m^2 ground floor Gross Internal Area (GIA));
- Unit 3 (7,614.00m^2 ground floor GIA); and
- Unit 4 (6,717.50m^2 ground floor GIA).

The existing ground floor GIA areas amounts to approx. 26,176.80m^2.

2.2 Land Surrounding the Application Site

The surrounding built environment is predominantly characterised by industrial, logistics, and retail uses to the south of the Application Site. Immediately to the north lies the Neasden London Underground Train Depot, while Wembley Stadium is situated further to the west.

Vehicular access to the Application Site is currently provided via Hannah Close, with Great Central Way (B4557) running along the southern boundary.

Additionally, railway infrastructure is located to the north of the Application Site, including the Jubilee Line, which connects Neasden and Wembley Park stations.

The wider industrial context of the building uses within the Wembley area consists of:

- Distribution centres;
- Waste;
- Light industrial businesses;
- Transport for London (TfL) underground train depot; and
- Railway Lines (TfL, Network Rail).

Other uses in the wider context consist of:

- Residential and retail development.

The nearest residential uses are approx. 200m to the north and south of the Application Site. These residential uses include:

- Residential properties surrounding Besant Way and Brentfield Road to the south; and
- Emerging residential development to the west, notably Wembley Park around Wembley Stadium.

3.0 The Proposed Development

3.1 Nature of the Proposed Development

The Applicant is seeking a flexible outline planning consent to cover a range of potential development options on the Application Site, including a mix of single level and multi-level logistics, waste facility and data centre buildings. This outline planning application (OPA) will be supported by a series of Parameter Plans and the Development Specification (which caps Gross External Area (GEA) based on land uses).

For the purposes of the OPA, the technical assessments (**sections 5.2.1 – 5.2.12**) have used a maximum GEA Floorspace for each potential use. These are detailed in **Table 3.1.**

Table 3.1: Maximum GEA Floorspace by Use

Use	Maximum Floorspace (GEA)
Industrial and Logistics	71,000m^2
Data Centre	32,000m^2
Waste Facility	10,000m^2

The maximum GEAs per use will be used to inform the 'worst case' trip generation for the Proposed Development, as well as inform other technical assessments that rely on this data (e.g. noise and air quality).

The Applicant has therefore worked up a maximum development parameter for the Application Site, which is the maximum extents and heights of the development that could come forward at Reserved Matters Application (RMA) stage. This maximum development parameter will be used to inform the 'worst case' for those technical disciplines where consideration of height, scale and massing is relevant (e.g. townscape and visual effects; built heritage; and sunlight, daylight and overshadowing). The maximum development parameter is shown in **Figure 2, Appendix A**.

Each of the technical sections contained within **Section 5.2 Consideration of Likely Environmental Effects** of this Request includes a sub-section entitled 'Maximum Development Scenario' which clearly sets out the 'worst case' assumptions that have informed the assessment of that particular technical topic.

3.2 Likely Construction Programme

Whilst the construction programme is still subject to change, it is currently envisaged that construction works would commence in Q1 2028, with the Proposed Development being fully operational in Q1 2030.

3.3 Embedded (Primary) Mitigation

The design has been developed with inputs from the technical consultant team and therefore includes embedded (primary) mitigation in order to avoid and/or reduce adverse environmental effects. Embedded mitigation measures for the Proposed Development includes:

- Biodiverse green roofs incorporated onto the proposed buildings where possible, based on a low-nutrient substrate and plug planted and seeded with species of known value to wildlife;
- Vertical greening consisting of trellises with climbing plants utilising native species can be incorporated on suitable elevations of the proposed buildings;

- Sustainable Drainage System (SuDS) features such as rain gardens and attenuation basins;
- Bird and bat boxes could be incorporated into the designs of the new buildings;
- Wildlife friendly planting, including native trees, shrubs and herbaceous species can be included within the proposed landscaped areas.

3.4 Known cumulative development

The EIA Planning Practice Guidance (PPG) makes clear that regard should be given to the possible cumulative effects arising from a Proposed Development and from any existing or approved development. These effects are known as inter-development cumulative effects. Consideration of cumulative schemes is typically limited to those within 500m of the Application Site that are themselves above the relevant screening thresholds and criteria for category 10(b) urban development projects, namely those that:

- the Application Site has an area above 5 ha; and
- the Proposed Development provides more than 1 ha of floorspace that is non-dwellinghouse floorspace.

Based on the criteria outlined, a search has been undertaken to identify any existing or approved developments that could be affected by cumulative impacts arising from the Proposed Development. The search has shown that there are no relevant developments within 500m that would be affected by cumulative impacts associated with the Proposed Development.

4.0 The EIA Screening process

4.1 Overview in the Context of the EIA Regulations

The EIA Regulations are applied to certain types of development that are likely to have significant effects on the environment. Various development types are categorised in the EIA Regulations as Schedule 1 or Schedule 2 developments.

The first stage of the EIA screening process is to determine whether the Proposed Development is of a type described under Schedule 1 or Schedule 2 of the EIA Regulations. Development described under Schedule 1 must be subject to EIA. Development described under Schedule 2 may be EIA development, depending on whether it is likely to have significant effects on the environment.

EIA is only intended to be required for a small number of development proposals where significant environmental effects are likely. Within Schedule 1 of the EIA Regulations, there are a range of major projects for which EIA is mandatory.

In the case of Schedule 2 projects, the location of the development must be examined to determine if it is in a sensitive area. This is defined in the EIA Regulations as including:

- Sites of Special Scientific Interest (SSSIs);
- Land under nature conservation orders and international conservation sites (e.g. Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites);
- National Parks (including the Broads);
- Areas of Outstanding Natural Beauty (AONBs) (now called National Landscapes);

- World Heritage Sites; and
- Scheduled Monuments.

If the Application Site is classed as being within a 'sensitive area' then the screening criteria and thresholds in Schedule 2 are not applicable and the Proposed Development is examined to determine whether it is likely to have significant effects on the environment. If so, the development is an 'EIA Development' and an ES is required.

If the development is not in a sensitive area, the next stage in the screening process is to assess whether the development proposals meet or exceed any of the applicable thresholds and criteria for that particular type / class of development. These thresholds and criteria are related to the attributes (e.g. size of the Application Site, production / output, capacity of a facility) of a type of development, and not exceeding or meeting them is a strong indication that an EIA is not required[2].

If the development exceeds or meets any of the applicable thresholds and criteria, then it is termed a Schedule 2 development, and the next stage is to assess if it is likely to have significant effects on the environment.

This Request for a Screening Opinion follows the above screening process as it applies to this Proposed Development, to assist the planning authority in determining whether it is an EIA development and so requires the preparation of an ES to accompany any planning application.

The flow chart from the EIA PPG (2014, as amended 2020) has been used as a guide to the various stages of the process.

4.2 EIA Schedule 1

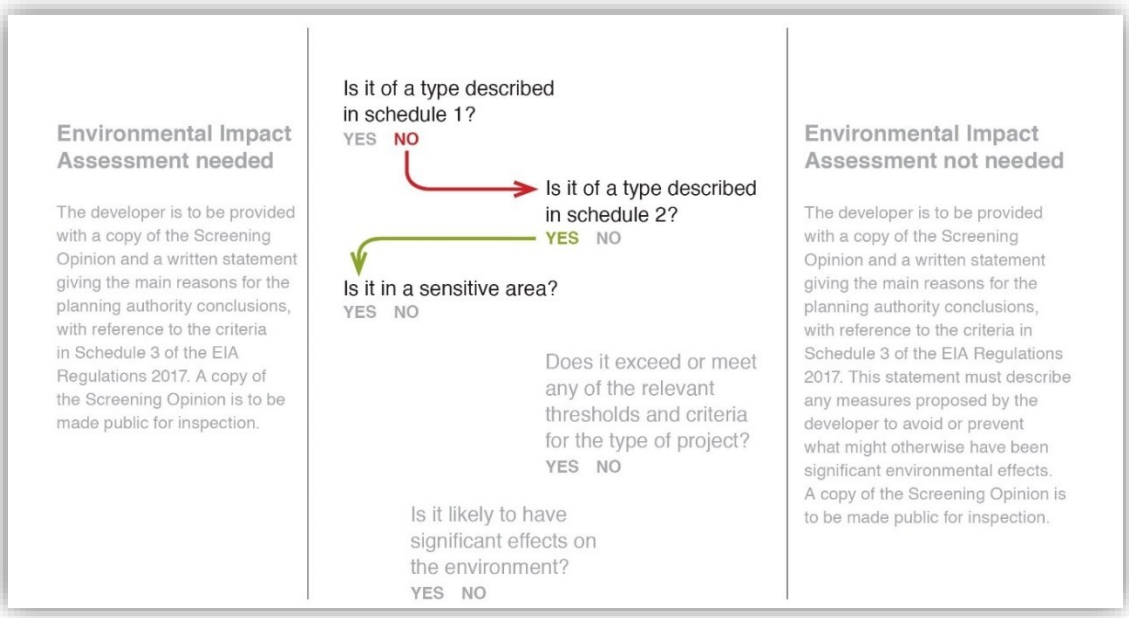
The Proposed Development is not listed under Schedule 1 of the EIA Regulations. Therefore, the requirement for EIA is not mandatory.

4.3 EIA Schedule 2

The Proposed Development is of a type listed under Schedule 2 of the EIA Regulations, falling under either category 10(a) industrial estate development projects or Category 10(b) urban development projects.

Where development is of a type described in Schedule 2, an EIA is more likely to be required if the Application Site is located in a sensitive area, or the scale of the development meets or exceeds the applicable thresholds and criteria.

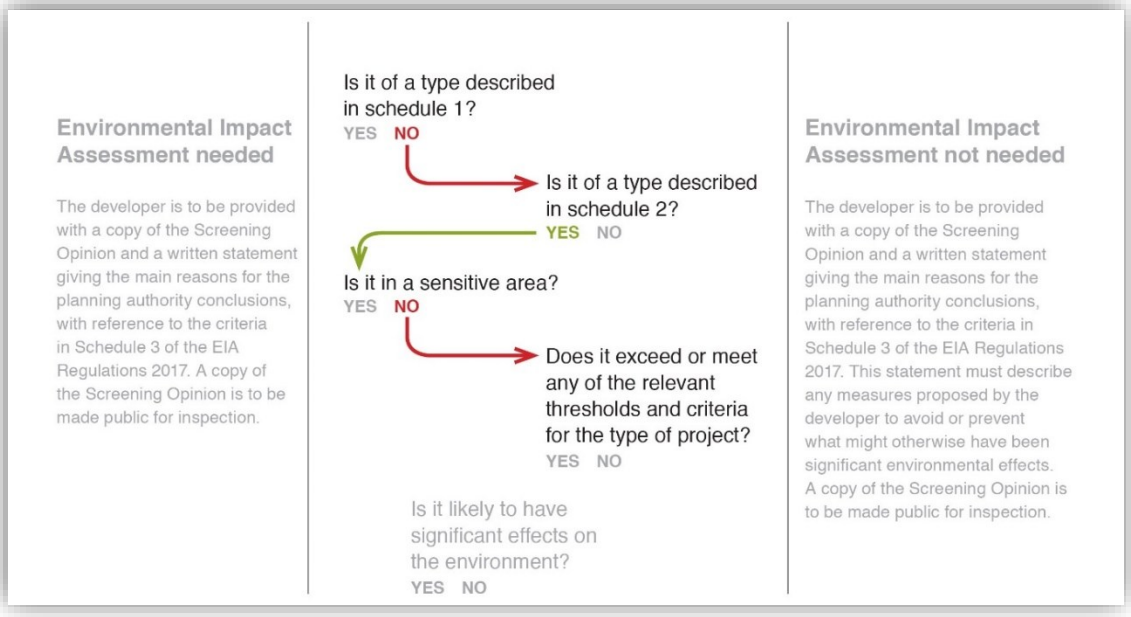
[2] Regulation 5(7) of the EIA Regulations enables the Secretary of State to direct that a development described in Schedule 2 is EIA development even if it falls below the exclusive thresholds.



4.4 Sensitive Areas

The Application Site is not located within a 'sensitive area', as defined in the EIA Regulations.

The requirement for EIA must now consider whether the Proposed Development exceeds applicable thresholds within Schedule 2 and is likely to have significant effects on the environment.

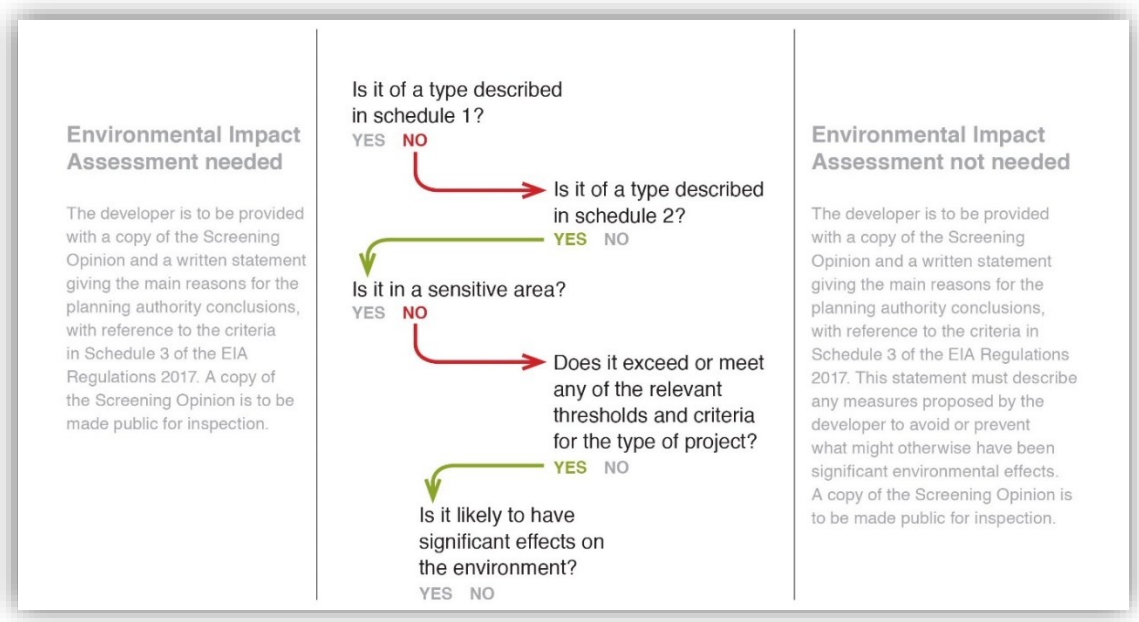


4.5 Applicable Thresholds

The Proposed Development falls within either Schedule 2, Category 10(a) *industrial estate development projects* or Schedule 2, Category 10(b) *urban development projects*.

Irrespective of whether the Proposed Development is considered to be category 10(a) or category 10(b), the relevant screening thresholds and criteria are met on the basis that:

- the Application Site has an area above 5ha; and
- the Proposed Development provides more than 1 hectare of floorspace that is non-dwellinghouse floorspace.



5.0 Assessment of Likely Environmental Effects

5.1 Comparison with the PPG

The EIA Planning Practice Guidance provides further indicative criteria and thresholds that can be helpful in determining whether significant environmental effects are likely for the Proposed Development.

For development classified under Category 10(a) in Schedule 2, the PPG suggests that EIA is more likely where:

i. *The area of the development exceeds 0.5 hectares;*
ii. *It is not located within an existing industrial estate; or*
iii. *It is located within an existing industrial estate but the development area exceeds 1 hectare.*

For development classified under Category 10(b) in Schedule 2, the PPG suggests that EIA is more likely where:

i. *The area of the scheme is more than 5 hectares; or*
ii. *It would provide a total of more than 10,000 m^2 of new commercial floorspace; or*
iii. *The development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).*

The Application Site is within an urbanised area and exceeds 5 hectares. The Proposed Development therefore does meet the indicative criteria and thresholds (i.e. criteria i).

5.2 Likely Environmental Effects

5.2.1 Air Quality and Odour

SLR Consulting has been commissioned by the Applicant to prepare an Air Quality Assessment, and a full copy of the assessment will be provided with the OPA. The following sections summarise the findings.

5.2.1.1 Maximum Development Scenario

For the purposes of this request for a screening opinion, the assessment of air quality has been undertaken using a maximum development scenario. This approach ensures that the parameters with the greatest potential to result in significant environmental effects are assessed. By adopting this worst-case scenario, it can be reasonably assumed that any alternative or lesser design options would result in impacts of no greater significance. The approach is based on guidance, policy and established best practice.

Certain proposed uses listed in Section 3.1 may involve specific operational activities that result in odour or combustion emissions. For example, a data centre may include standby diesel generators, or a waste facility may release odour emissions. To undertake a detailed assessment, detailed specifications of these activities are required. As this information is not available at this stage and will be confirmed once a preferred development option is carried forward at the RMA stage, it is proposed to assess each land use in principle, while including a commitment to conduct an assessment once further design details become available.

5.2.1.2 Baseline Conditions

A review of baseline air quality conditions within proximity of the Application Site has been undertaken with reference to the latest available air quality data in the public domain. This includes:

- London Local Air Quality Management (LLAQM) Air Quality Annual Status Reports (ASR);
- London Atmospheric Emissions Inventory (LAEI);
- Automatic Urban Monitoring Network (AURN); and
- Department for Environment Food and Rural Affairs (Defra) 1km background mapped concentration estimates (2021 base year).

The Application Site is located within an Air Quality Management Area (AQMA). The Brent AQMA was declared in 2006 due to exceedances of the NO_2 annual mean and PM_{10} 24-hour mean Air Quality Objectives at locations of relevant exposure. Furthermore, the Application Site is adjacent to an Air Quality Focus Area (AQFA), covering the A406 – a key arterial road. It is also located within Growth Area: Policy BCGA1 Wembley Growth Area.

The London Borough of Brent undertakes NO_2 monitoring in the local area, including at key roadside locations along the A406. The latest annual mean NO_2 concentrations at the nearest monitoring sites (BT4 and 52, within 1km of the Application Site) are below, but within 10% of, the Air Quality Objective. Historically, concentrations at these locations have exceeded the Air Quality Objectives, indicating a trend of local improvement. Monitoring data are presented in Table 5.1, with concentrations exceeding the Air Quality Objective shown in **bold**.

Table 5.1: Local NO_2 Monitoring

Monitor	NGR		Annual Mean NO_2 Concentration (µg/m³)				
	X	Y	2019	2020	2021	2022	2023
BT4	520866	185169	**63.0**	**49.0**	**46.4**	**43.2**	38.7
52	520874	185173	**70.6**	**46.6**	**46.2**	**44.4**	37.6

5.2.1.3 Likely Effects during Construction (including Mitigation)

Construction Dust

Dust generated during anticipated construction activities will be assessed in accordance with the Institute of Air Quality Management's (IAQM): Assessment of Dust from Demolition and Construction guidance[3]. The findings will inform recommendations for appropriate dust control measures which, when effectively implemented, will ensure that residual impacts are not significant. These measures will be supported by a proactive communications and monitoring framework.

In addition, emission controls for Non-Road Mobile Machinery (NRMM) will be specified in line with the Mayor of London's NRMM Low Emission Zone (LEZ) requirements, including:

- All NRMM will need to meet Stage IV.
- All Generators will need to meet Stage V.

[3] IAQM, Guidance on the Assessment of Dust from Demolition and Construction, v2.2, (2024).

5.2.1.4 Likely Effects during Operation (including Mitigation)

Road Traffic Movements

An assessment of road traffic movements will be undertaken in accordance with the Environmental Protection UK (EPUK)) and the IAQM: Land-Use Planning and Development Control: Planning for Air Quality[4]. This will comprise an initial screening exercise to compare maximum projected vehicle movements against the relevant screening thresholds to determine whether further assessment is required or if impacts can be considered insignificant. As the Application Site is located within an AQMA, the relevant screening thresholds are:

- 100 Annual Average Daily Traffic (AADT) for light goods vehicles (LGVs); and/or
- 25 AADT of Heavy-Duty Vehicles (HDV).

The Application Site has an existing use; therefore, to fully understand the change in environmental impacts, the screening will be based on net vehicle movements (i.e. the difference between existing and proposed flows). Each proposed development scenario will be considered, with the assessment focusing on the worst-case option to maintain design flexibility.

Where these thresholds are exceeded, a detailed dispersion modelling assessment (ADMS-Roads) will be undertaken to quantify the change in pollutant concentrations at nearby sensitive receptors, simulating future opening-year conditions.

While the Proposed Development is not located along the A406, operational traffic is expected to route via this key arterial corridor. Given its strategic function and high traffic volumes, conditions along the A406 provide a reasonable indication of worst-case pollutant levels within the study area. Recent monitoring indicates compliance with the Air Quality Objectives and a clear trend of improvement (Table 5.1), which is expected to continue through to and beyond the operational phase of the Proposed Development. In this context and given the relatively small net change in traffic anticipated, operational emissions are not expected to give rise to likely significant effects.

Nevertheless, a standalone Air Quality Assessment will be submitted with the OPA to quantify operational impacts and, if required, identify appropriate mitigation. The scope of any modelling will be agreed with the relevant statutory consultees and undertaken in line with current technical guidance.

Air Quality Neutral and Positive

An air quality neutral assessment will be undertaken to consider the emission performance of the development (road traffic and building) against the relevant benchmarks. Where these benchmarks are exceeded, mitigation measures would be recommended to offset any potential impacts.

An Air Quality Positive Statement will also be prepared in accordance with the Greater London Authority's (GLA) Air Quality Positive London Plan Guidance (2023)[5] to demonstrate that air quality has been a key consideration throughout the design process. This will outline how the design maximises benefits to local air quality and the measures adopted to minimise pollution exposure.

[4] EPUK & IAQM, Land-Use Planning and Development Control: Planning for Air Quality, v1.2, (2017).

[5] Greater London Authority (2023) Air Quality Positive London Plan Guidance. Available at: https://www.london.gov.uk/sites/default/files/2023-02/Air%20Quality%20Positive%20LPG.pdf [Accessed 3rd September 2025].

However, in line with the overarching approach to the assessment, building emissions will not be addressed and are scoped out at this stage, as sufficient detail is not yet available. The assessment will therefore focus on the land use in principle.

5.2.1.5 Conclusions

For the Air Quality Assessment, no significant environmental effects are anticipated during the construction, operation, or decommissioning phases of the Proposed Development.

The forthcoming OPA will be supported by a suite of technical documents, including an Air Quality Assessment, to ensure that all potential impacts are appropriately considered and by Brent Council when determining the OPA.

5.2.2 Archaeology

Museum of London Archaeology (MOLA) has been commissioned by the Applicant to prepare an archaeological desk-based assessment, and a full copy of the assessment will be provided with the application. The following sections summarise the findings.

5.2.2.1 Maximum Development Scenario

For the Archaeology assessment, the development parameters used will remain the same regardless of the development scenario carried forward. The assessment will therefore be based off:

- Consultation of a broad range of sources to ensure compliance with the National Planning Policy Framework (NPPF) and professional guidelines. Sources include:
  - Greater London Historic Environment Record (GLHER) data, which includes information from past investigations, local knowledge, find spots, and documentary and cartographic sources. A 1km radius study area around the Application Site was considered to adequately characterise the likely archaeological conditions within the Application Site. The study area was confirmed by the local planning authority archaeological advisor in an email dated 12th August 2025.
  - Statutory heritage designations, including Scheduled Monuments and Listed Buildings, as recorded on the National Heritage List for England (NHLE), within the 1km study area.
  - British Geological Survey (BGS) data[6], showing the superficial and bedrock geology underlying the Application Site.
  - Historic Ordnance Survey mapping from the 1870s onwards.
- Assessing the likely impacts on potential heritage assets, identified from the above sources; and
- Suggesting mitigation measures to offset any adverse effects.

5.2.2.2 Baseline Conditions

There are no nationally designated heritage assets, such as scheduled monuments, listed buildings and registered parks and gardens, within the Application Site. Within the 1km study

[6] British Geological Survey. (n.d.). BGS Maps Portal. Available at: https://webapps.bgs.ac.uk/data/MapsPortal/?_ga=2.153069305.1924973710.1755098420-1693185905.1755098420 [Accessed 14th August 2025].

area there is one Grade II Listed building, The Grange, 600m north-east of the Application Site.

The Application Site is not in an archaeological priority area (APA). The Neasden APA, covering the historic medieval core of Neasden is 200m to the north-east of the Application Site.

No archaeological investigation has been undertaken on the Application Site.

Within the 1km study area, investigations have been undertaken at three sites. These investigations have recorded remains of 19th or 20th century date only.

BGS data[6] shows that the underlying geology under the majority of the Application Site is London Clay. A very small area in the western part of the Application Site is on river terrace gravels. The heavy soils of the London Clay would have been less attractive for early settlement and farming.

Prehistoric remains in the study area are limited to the findspot of a Bronze Age palstave (axe) which is recorded 450m to the north-east of the Application Site. No Roman remains have been recorded in the study area.

During the Roman period, the Application Site was located some distance from known settlements. The main Roman road of Watling Street was 2.3km to the north-east of the Application Site.

The GLHER records the area of the medieval settlement of Tokyngton, with Saxon origins, 250m to the south-west of the Application Site. The medieval settlement of Neasden was 200m to the north-east of the Application Site. No early or later medieval remains have been recorded in the study area. The Application Site was likely in fields throughout these periods.

Historic Ordnance Survey maps show that the Application Site was in fields, apart from a small feeder for the canal, during the 19th century. In the early 20th century railway sidings were constructed across the Application Site. Then railway sidings were removed by the mid-1970s. The current buildings of the Hannah Close Industrial Estate were constructed in the 1980s.

The Application Site has a low potential for remains for archaeological remains from all periods, apart from the late post-medieval period. Remains associated with 20th century railway infrastructure may be present, which would be of low heritage significance.

5.2.2.3 Likely Effects during Construction (including Mitigation)

Potential effects would comprise physical impacts upon below-ground non-designated archaeological remains. Such effects would arise from the any proposed basements, piled foundations of new buildings, trenches for new utilities and services and other groundworks.

An appropriate mitigation strategy would aim to reduce or offset any adverse effect. Measures to mitigate effects would normally consist of design adjustments, to allow significant resources to be protected and retained (preservation in situ) or, where this is not feasible, investigation and recording before and during development, with dissemination at an appropriate level (preservation by record).

5.2.2.4 Likely Effects during Operation (including Mitigation)

There would be no effect during the operation phase. Once the Proposed Development has been completed, no further ground disturbance would occur and consequently there would be no additional impacts or resulting environmental effects upon buried heritage assets.

5.2.2.5 Conclusions

For the archaeology assessment, no significant environmental effects are anticipated during the construction, operation, or decommissioning phases of the Proposed Development. This is due to the Application Site not being located within an APA and only has the potential for archaeological remains of no more than low heritage significance.

The forthcoming OPA will be supported by a suite of technical documents, including an archaeological desk-based assessment, to ensure that all potential impacts are appropriately considered and by Brent Council when determining the OPA.

5.2.3 Built Heritage

Turley Heritage and Townscape has been commissioned by the Applicant to prepare a Built Heritage and Townscape Statement, and a full copy of the assessment will be provided with the OPA. The following sections summarise the findings.

5.2.3.1 Maximum Development Scenario

For the purposes of this request for a screening opinion, the built heritage assessment has been undertaken using a maximum development scenario (i.e. the maximum possible extents of built form for any of the Proposed Development). This approach ensures that the parameters with the greatest potential to result in significant environmental effects are assessed. By adopting this worst-case scenario, it can be reasonably assumed that any alternative or lesser design options would result in impacts of no greater significance.

5.2.3.2 Baseline Conditions

The Application Site does not have any current statutory, local or other heritage designations. However, there are several built heritage assets (receptors) within the wider vicinity of the Application Site that have the potential to be affected by the Proposed Development, through a change in a part of their settings, including:

- Neasden Conservation Area to the north
- Brent River Park (Locally Listed Park and Landscape) to the south-west
- Group of heritage assets at the Neasden Lane roundabout to the north-east including:
- The Grande (a Grade II Listed Building)
- The Grange (Locally Listed Park and Garden)
- St Catherine's Church (Local Heritage Asset)
- Wembley Arena (Formerly the Empire Pool) (Grade II Listed Building) to the west. This heritage asset is unlikely to be affected by the Proposed Development but has been included in the baseline conditions due to its association with Wembley Stadium and the associated designated views (see townscape section).

5.2.3.3 Likely Effects during Construction (including Mitigation)

Construction effects will likely include hoarding, portacabins, large equipment and construction traffic in and around the Application Site. The likely magnitude of impact of these effects would be negligible or none, due to their temporary nature, the distances between the Application Site and the identified built heritage receptors, intervening built form and mitigation methods which could be secured through a Construction Environmental Management Plan (CEMP).

5.2.3.4 Likely Effects during Operation (including Mitigation)

The Proposed Development would introduce new built form of scale into the Application Site and would result in a change to a part of the identified built heritage receptors' settings.

An initial Zone of Theoretical Visibility (ZTV) has been prepared, shown in **Plate 5.1**, which shows the potential visibility of the Proposed Development.

This indicates limited visibility of the Proposed Development from within the context of the identified built heritage receptors. As part of the assessment process, verified wirelines will be produced from a series of identified views, including within the vicinity of the built heritage receptors, to further test likely impacts (see section 5.2.10). At this stage, and considering the findings of the ZTV, we do not anticipate the Proposed Development having any adverse impacts on the identified built heritage receptors. If any adverse impacts are identified through the assessment process, these are unlikely to be significant in EIA terms.

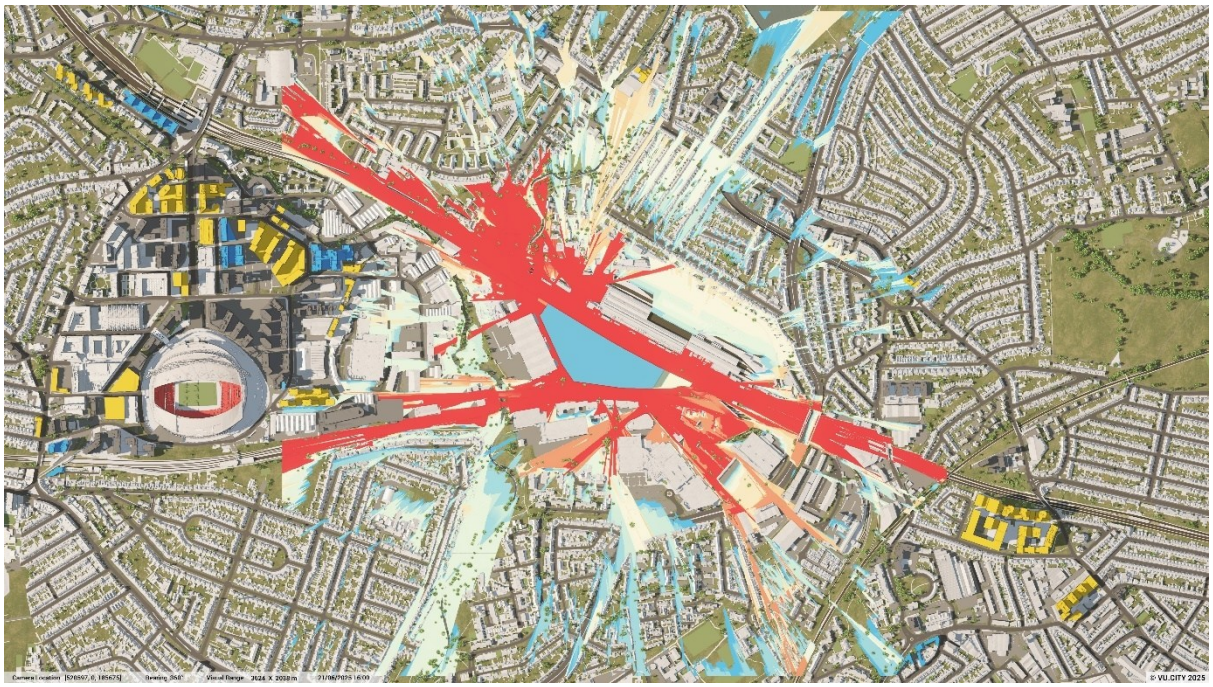


Plate 5.1: The Zone of Influence of the Proposed Development

5.2.3.5 Conclusions

For the built heritage assessment, no significant environmental effects are anticipated during the construction, operation, or decommissioning phases of the Proposed Development.

The forthcoming OPA will be supported by a suite of technical documents, including Built Heritage and Townscape Statement, to ensure that all potential impacts are appropriately considered and by Brent Council when determining the OPA.

5.2.4 Daylight, Sunlight and Overshadowing

GIA has been commissioned by the Applicant to review daylight, sunlight, overshadowing and solar glare considerations for the purposes of the application. The following sections summarise the findings.

5.2.4.1 Maximum Development Scenario

For the purposes of this request for a screening opinion, the potential for daylight, sunlight, overshadowing and solar glare has been reviewed using a maximum development scenario

(i.e. the maximum possible extents of built form for any of the Proposed Development). This approach ensures that the parameters with the greatest potential to result in significant environmental effects are assessed. By adopting this worst-case scenario, it can be reasonably assumed that any alternative or lesser design options would result in impacts of no greater significance.

Based on local, regional and national policy and guidance, the key considerations arising from the Development are:

- The potential for daylight and sunlight effects to sensitive residential receptors;
- The potential for overshadowing to surrounding outdoor sensitive areas; and
- The potential for solar glare arising from the Development to surrounding road and railway viewpoints.

5.2.4.2 Baseline Conditions

The Application Site is located to the east of the wider Wembley masterplan area. The Application Site currently comprises three low rise warehouse buildings and car parking and is bounded by Hannah Close along the southwestern perimeter, Grand Central Way along the southeastern perimeter and the railway line along the northeastern perimeter.

The context immediately surrounding the Application Site comprises low rise commercial buildings, such as warehouses and train depots. Approximately 300m northeast, there are residential terraced properties on Village Way. A green outdoor area surrounding the River Brent is located approximately 150m east. A use map, indicating buildings within the zone of influence from the Proposed Development is provided in **Plate 5.2**.

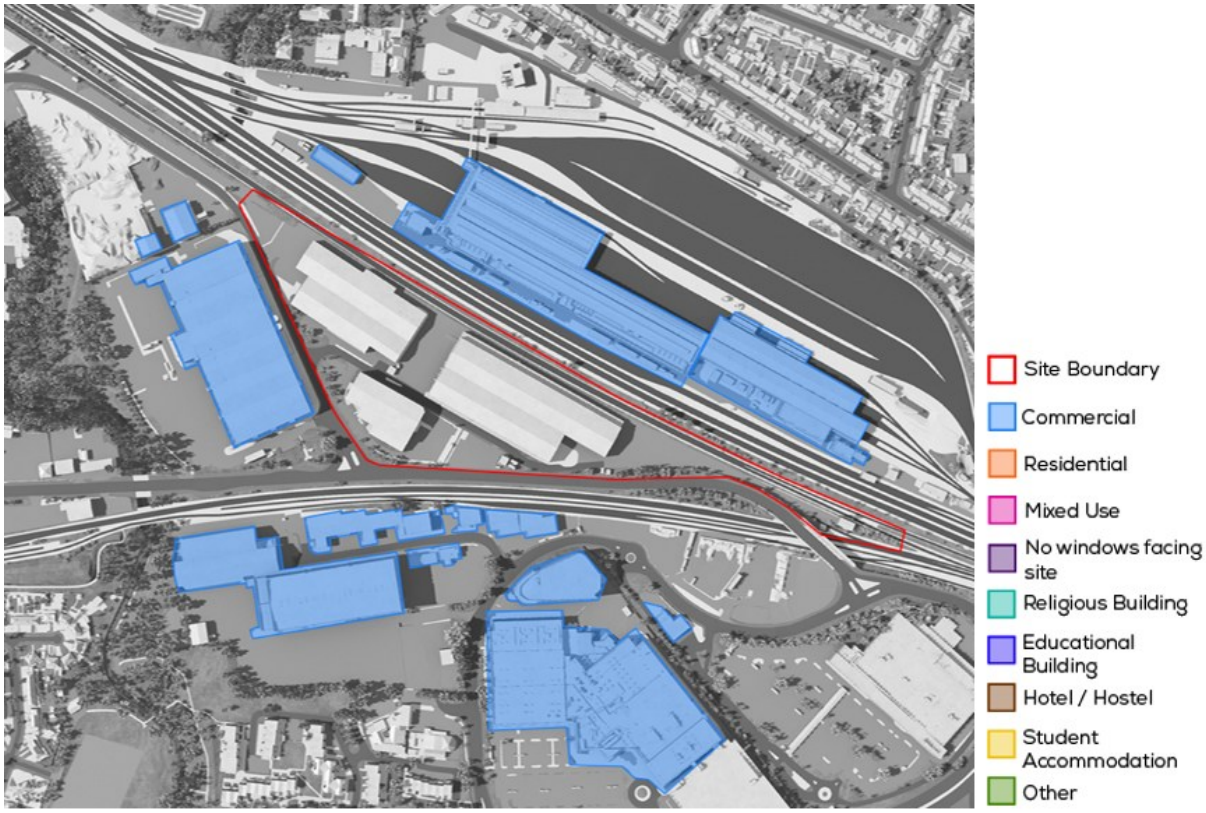


Plate 5.2: Buildings Located within the Zone of Influence of the Proposed Development

5.2.4.3 Likely Effects during Construction (including Mitigation)

During the demolition and construction phases, any effects would arise from evolving in building form, height, and massing as works progress. Structures erected during these phases, such as scaffolding, cranes, site hoardings, and partially completed building elements, are transient in nature and typically present only temporary or highly localised changes to daylight and sunlight availability, overshadowing patterns, and solar glare potential.

5.2.4.4 Likely Effects during Operation (including Mitigation)

The Development is not anticipated to result in any significant effects in relation to daylight, sunlight, overshadowing during the operational phase. A review of the surrounding context has been undertaken, which confirms that there are no sensitive receptors in close proximity to the Application Site. The nearest existing residential properties and outdoor spaces are located at a substantial distance, such that any potential changes in daylight, sunlight or overshadowing would be negligible. In line with industry standards, commercial buildings do not have a reasonable expectation of daylight or sunlight and therefore are not relevant for impact assessment.

As this application is in outline form, detailed façade design information is not yet available and therefore a quantitative assessment of potential solar glare cannot be undertaken for the Development. In fact, solar glare effects are dependent on the building massing as well as orientation and materiality of the facades. An initial view of receptor locations indicate that there is potential for adverse solar glare impacts, albeit these would be limited to viewpoints in relatively close proximity to the Application Site. In accordance with best practice and industry guidance, a detailed solar glare assessment will be undertaken and submitted with any Reserved Matters application, when façade design, glazing specifications and materials

are confirmed, to ensure any residual risk is fully addressed. At outline stage, recommendations will be provided to the design team and captured within the Design Guide so that potential solar glare effects can be minimised.

The position of sensitive views to be considered will be reviewed and determined at RMA stage depending on the proposal, however it is expected that the following tracks and direction of travel will require consideration, these are shown in **Plate 5.3**.

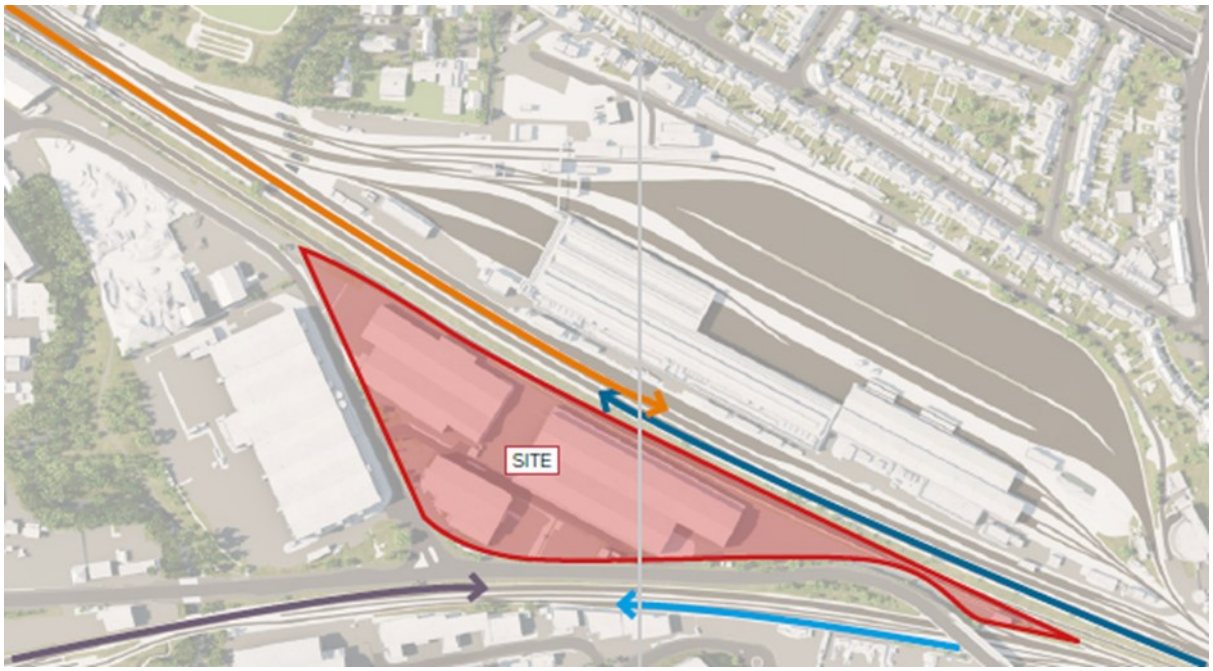


Plate 5.3: Railway Tracks and Direction of Travel Surrounding the Application Site

5.2.4.5 Conclusions

For the daylight, sunlight, overshadowing and solar glare, no significant environmental effects are anticipated during the construction, operation, or decommissioning phases of the Proposed Development.

Given that there are no receptors which would be affected in terms of daylight, sunlight and overshadowing by the Proposed Development, no technical documents considering these topics will be required for the forthcoming submission. Whilst solar glare will require further consideration, given the outline nature of the proposal, a technical solar glare assessment is not available at this time. A technical solar glare report will be prepared at Reserved Matters stage, to ensure that all potential impacts are appropriately address for Brent Council to determine the OPA.

5.2.5 Ecology and Biodiversity

Greengage Environmental Ltd (Greengage) has been commissioned by the Applicant to prepare a Preliminary Ecological Appraisal (PEA), to provide a comprehensive assessment of the existing ecological value of the Application Site, and a full copy of the PEA will be provided with the OPA. The following sections summarise the findings.

A site survey has been undertaken in accordance with UK Habitat Classification System (UK Hab) and the Chartered Institute of Ecological and Environmental Management (CIEEM) Guidelines for Ecological Impact Assessment, in accordance with BS242020:2013: Biodiversity. Fauna using the Application Site and areas of habitat suitable to support statutorily protected species were identified, with an active search carried out for evidence of use. The site survey also included a Potential Roost Assessment (PRA) and Ground Level

Tree Assessment (GLTA) of buildings and trees within the Application Site, to assess for the potential of the Application Site to support roosting bats.

An ecological desk-based assessment has been carried out to gather site specific biological information gained from statutory and non-statutory consultation. A review of ecological information and relevant environmental databases including the Defra Multi-Agency Geographic Information for the Countryside (MAGIC) website[7], was undertaken for the Application Site and its vicinity. A data consultation with the Local Environmental Records Centre (LERC), Greenspace Information for Greater London (GIGL), for a 2km search radius around the Application Site, was also undertaken and the data received was reviewed to identify the location and citations of any local non-statutory designated sites and the presence of any protected/priority species.

5.2.5.1 Maximum Development Scenario

For the purposes of this request for a screening opinion, the ecology assessment has been undertaken using a maximum development scenario. This approach ensures that the parameters with the greatest potential to result in significant environmental effects are assessed. By adopting this worst-case scenario, it can be reasonably assumed that any alternative or lesser design options would result in impacts of no greater significance.

For ecology, the key parameters for assessment are:

- To assess the impact of the Proposed Development on existing habitats present at the Application Site;
- To assess the impact of the Proposed Development on designated sites; and
- To assess the impact of the Proposed Development on protected species and those of conservation concern.

5.2.5.2 Baseline Conditions

The Application Site was dominated by hardstanding with large buildings utilised as storage centres. The surrounding area was also densely urbanised, being dominated by commercial buildings, hardstanding and roads. Railway lines ran along the northern and southern boundaries of the Application Site, with a large depot present to the north. There was limited connectivity between the Application Site and any surrounding areas of greenspace due to the heavily urbanised nature of the wider area.

Desk Study

Consultation with the MAGIC database[7] have confirmed there are two statutory designated sites within 2km of the Application Site boundary, as described below.

Fryent Country Park Local Nature Reserve (LNR) is located approximately 1.45km northwest and comprises grassland, woodland and pond habitats. It supports a variety of invertebrate and bird species.

Brent Reservoir LNR and SSSI is located approximately 1km north of the Application Site. The Application Site is primarily designated for breeding and wintering wetland birds, alongside its variety of plant species of local importance. The Application Site falls within the SSSI Impact Risk Zone (IRZ) for this Application Site, which identifies the following risk criteria:

[7] Defra (n.d) MAGIC: Multi-Agency Geographic Information for the Countryside. Available at: https://magic.defra.gov.uk/ [Accessed 14th August 2025].

- **Infrastructure:** Pipelines and underground cables, pylons and overhead cables (excluding upgrades and refurbishment of existing network). Any transport proposal including new or extended footways, cycleways, roads/car parks, railways and waterways (excluding routine maintenance). Airports, helipads and other aviation proposals.
- **Minerals, Oil and Gas:** Planning applications for quarries, including: new proposals, Review of Minerals Permissions (ROMP), extensions, variations to conditions etc. Oil & gas exploration/extraction.
- **Air Pollution:** Any industrial/agricultural development that could cause air pollution (including: industrial processes, livestock & poultry units with a floorspace > 500m², slurry lagoons > 200m² & manure stores > 250 tonnes).
- **Combustion:** General combustion processes >20MW energy input. Incl: energy from waste incineration, other incineration, landfill gas generation plant, pyrolysis/gasification, anaerobic digestion, sewage treatment works, other incineration/combustion.
- **Waste:** Landfill. Including: inert landfill, non-hazardous landfill, hazardous landfill.
- **Compost:** Any composting proposal with more than 75,000 tonnes maximum annual operational throughput. Incl: open windrow composting, in-vessel composting, anaerobic digestion, other waste management.
- **Water Supply:** Large infrastructure such as warehousing/industry where the total net additional gross internal floorspace following development is 1,000m² or more.

The Proposed Development does not fall within the above-mentioned identified risk criteria and therefore consultation with Natural England will not be required.

Both statutory designated sites are separated from the Application Site by main roads and a railway line, as well as dense commercial and residential development, which limits local wildlife dispersal.

A review of the granted European Protected Species Licenses on MAGIC[7] identified two licences for Great Crested Newts (GCN) within 2km of the Application Site. No licences for bats or dormouse were identified. Both GCN licence records were from the same location, approximately 1.7km east of the Application Site, the most recent of which dated from 2020.

A review of data received from GIGL identified 28 Sites of Importance for Nature Conservation (SINC) within 2km of the Application Site boundary. The closest of these sites comprised The Canal Feeder, Quainton Street Open Space and Brent River Park Wembley, located approximately 90m, 160m and 175m from the Application Site respectively. Given the proximity of these sites to the development, indirect impacts may be incurred during the construction phase, such as pollution and dust deposition.

Site Walkover

The Application Site mostly comprises of developed land; sealed surface, with three large buildings of corrugated metal construction. Vegetation within the Application Site was limited to individual trees which were present along the southern site boundary, with small areas of introduced shrub, mixed scrub and modified grassland also present along the perimeter of the Application Site. The Invasive Non-Native Species (INNS) Japanese Knotweed was also recorded within the Application Site, to the southeastern corner. The Application Site is subject to 24-hour artificial security lighting and regular human disturbance.

The Application Site is therefore considered to provide negligible suitability for the following species, and therefore the effects of the Proposed Development are considered to have no impact:

- **Badger:** the Application Site does not provide any suitable habitat for sett excavation, foraging or ranging. The Application Site is isolated from more suitable habitat and is subject to high human disturbance.
- **Bats (foraging / commuting):** the Application Site is subject to bright 24-hour security lighting in the centre of a dense urban environment with little vegetation or opportunities for foraging or commuting. The closest suitable habitat for foraging bats is the River Brent and the associated woodland and scrub habitats, located 220m west at the closest point. Some connectivity to the Application Site was present via the railway lines, however the presence of busy main roads and dense urban infrastructure limit the suitability.
- **GCN:** no waterbodies were present within the Application Site or surrounding 500m of the Application Site boundary. One watercourse was present (the River Brent), approximately 220m west at the closest point, however this is likely to provide negligible suitability for breeding and commuting GCN due to the presence of fast flowing water. Terrestrial habitat on site was unsuitable to support foraging, and the urban landscape isolated the Application Site and forms barriers to wildlife dispersal which would limit GCN access to the Application Site.
- **Reptiles:** much of the Application Site comprises of hardstanding ground with limited vegetation present, which is considered unsuitable to support reptiles. Due to the isolated nature of the Application Site and the habitats present, it is considered highly unlikely that reptiles will be present within or adjacent to the Application Site.
- **Invertebrates:** the mixed scrub and introduced shrub planting may attract a small number of common invertebrate species, however, vegetated areas on the Application Site are limited and isolated and therefore unlikely to attract any notable invertebrate species.

The individual trees, mixed scrub and introduced shrub planting within the Application Site have moderate suitability to support nesting for common, urban bird species. However, as the Application Site is highly disturbed, it is unlikely to support large population assemblages.

All of the buildings within the Application Site were assessed to provide Negligible suitability to support roosting bats due to the unsuitable construction materials and the lack of suitable Potential Roosting Features (PRFs). A total of 60 trees were recorded within the Application Site, the majority of which were considered to be of negligible suitability to support roosting bats. However, several trees to the west of the Application Site were assessed as offering suitability to support individual roosting bats (PRF-I). Additionally, two trees to the east of the Application Site, along the Application Site boundary, had bat boxes installed.

5.2.5.3 Likely Effects during Construction (including Mitigation)

Statutory Designated Sites

Although the Application Site lies within the IRZ for Brent Reservoir SSSI, it is located 1km north of the Application Site and the type of development does not fall within the identified risk criteria. Therefore, consultation with Natural England will not be required. Due to the distance between the sites as well as the barrier of urban development and major roads, it is highly unlikely that the Proposed Development will directly impact the SSSI and therefore effects of the Proposed Development are considered to be non-significant.

No direct impacts to the designated sites are anticipated due to the Proposed Development and indirect impacts such as construction related dust, noise and lighting pollution can be outlined and mitigated within a CEMP, which is to be secured by planning condition.

If these mitigation measures are implemented, then no significant effects from the Proposed Development are considered to impact statutory designated sites.

Non-Statutory Protected Sites

Although several non-statutory designated sites were present within 2km of the Application Site, due to the highly urbanised nature of the surrounding area, it is considered unlikely that direct impacts will occur to these sites from the Proposed Development. However, indirect impacts may be incurred during the construction phase, such as pollution and dust deposition.

As described above for statutory designed sites, a CEMP should be produced and incorporate measures to limit indirect impacts to the nearby sites. Measures would likely include wetting down bare ground to prevent dust generation, storage of fuel/potentially hazardous chemicals in line with 'Control of Substances Hazardous to Health' (COSHH) regulations and limiting construction to daylight hours.

If these mitigation measures are implemented, then no significant effects from the Proposed Development are considered to impact non-statutory designated sites.

Bats

No further targeted surveys are considered to be required. Should the trees with PRF-I suitability require felling, Precautionary Methods of Work (PMoW) would be recommended, including a soft-fell of the trees, to be overseen by an Ecological Clerk of Works (ECoW). Additionally, if the trees with bat boxes on-site require removal, or if construction is taking place within close proximity, then an inspection of the boxes should be undertaken by a licenced ecologist prior to removal, in order to check whether the boxes are in use.

If these mitigation measures are undertaken, then no significant effects from the Proposed Development are considered to impact roosting bats.

Birds

If any clearance of vegetation is to be undertaken within the nesting bird season of March to August inclusive, this may cause damage to active nests. In order to avoid any adverse impact on nesting birds, any vegetation clearance should be undertaken outside of the nesting bird season. If this is not possible, a nesting bird check will be required to be undertaken by a suitably experienced ecologist immediately prior to clearance works, no more than 48hours in advance.

If these mitigation measures are undertaken, then no significant effects from the Proposed Development are considered to impact birds.

Invasive Non-Native Species

Japanese knotweed within the Application Site should be subject to a INNS management plan, detailing measures for its safe removal from the Application Site, and measures to prevent its spread. Measures should be detailed with a CEMP for the development, which is to be secured by planning condition.

5.2.5.4 Likely Effects during Operation (including Mitigation)

No likely effects are considered to apply to ecological receptors during operation of the Proposed Development.

5.2.5.5 Biodiversity Enhancement

The following provisions can be implemented within the proposals to ensure that the Application Site provides benefits to local ecology and increase on-site opportunities for wildlife post- development:

- A sensitive lighting strategy could be implemented for the operational phase of the development, following guidance provided within Guidance Note 8 by the Institute of Lighting Professionals and Bat Conservation Trust as far as reasonably practicable;
- Biodiverse green roofs could be incorporated onto the proposed buildings where possible, based on a low-nutrient substrate and plug planted and seeded with species of known value to wildlife. Green roofs can be further enhanced through the inclusion of features such as log piles, rock piles, sandy piles, and ephemeral wetlands. This will benefit wildlife, including invertebrates, birds and foraging bats;
- Vertical greening consisting of trellises with climbing plants utilising native species can be incorporated on suitable elevations of the proposed buildings where feasible.
- Wildlife friendly planting, including native trees, shrubs and herbaceous species can be included within the proposed landscaped areas. Provision of targeted landscaped areas and native planting will provide more value for wildlife than the current isolated and non-native / ornamental planting on-site. Planting should include shrubs or perennials of known value to wildlife such as those listed on the Royal Horticulture Society (RHS) Plants for pollinators;
- SuDS features such as rain gardens and attenuation basins can be incorporated to provide ephemeral wetland habitats at ground level;
- Bird boxes could be installed within the Application Site, avoiding southern facing aspects and overlooking areas of wildlife friendly landscaping where possible;
- Bat boxes could be incorporated into the designs of the new buildings near foraging/commuting habitat or adjacent to newly created habitats. These should be positioned at a minimum of 3m from ground level facing south, away from artificial lighting; and
- Provisions for invertebrates can be made within proposed soft landscaping areas to provide enhancement to retained and created planting areas. Bug hotels could be installed alongside pollinator friendly native planting. If tree removals occur, small log piles could also be placed in landscaped areas to further enhance invertebrate opportunities.

Conclusions

The forthcoming OPA will be supported by a suite of technical documents, including a PEA, to ensure that all potential impacts are appropriately considered and mitigated where necessary.

Subject to on-site ECoW supervision (where applicable) and implementation of a CEMP by the Contractor responsible for the construction of the Proposed Development, to detail measures for controlling construction-related pollution including dust, lighting, noise and the spread of INNS, and which will be secured by planning condition, no significant adverse effects to ecology of the Application Site or surrounding ecological receptors are considered likely during construction or operation of the Proposed Development.

Therefore, for the ecology assessment, no significant environmental effects are anticipated during the construction, operation, or decommissioning phases of the Proposed Development.

5.2.6 Ground Conditions

Evolve has been commissioned by the Applicant to review the ground condition considerations for the purposes of the application. The following sections summarise the findings.

The following assessments and reports have been undertaken at the Application Site and reviewed to establish the existing ground conditions at the Application Site and to determine whether the Proposed Development could give rise to significant effects. Further details can be found within the referenced documents.

- Site Investigation Report by Wembley Laboratories Limited dated June 1978;
- Site Condition Report by AA Environmental (AAE) LLP/ Careys Environmental Services Limited dated October 2009 ref. 093029;
- Land Quality Report by AAE Limited dated December 2021 ref. 213434; and
- Ground Conditions Assessment – Pre Acquisition Advice – Ground Conditions – Technical Note by Stantec dated January 2022 ref. TN001 (GEO) Rev 01.

5.2.6.1 Baseline Conditions

The ground conditions on the Application Site can generally be summarised as:

- Made Ground /Fill – variable composition up to a maximum of an average thickness of approximately 3.2m;
- Alluvium – less than 1m thick;
- River Terrace Deposits (RTD) – Taplow Gravels – typically 1-2m thick with a ‘belt through the middle of the Application Site’ 2-4m thick; and
- London Clay – encountered at between 4 and 6m bgl.

Groundwater

Groundwater levels are subjected to variations caused by changes in the local drainage conditions and also by seasonal effects. Due to the hydraulic properties of the underlying London Clay, perched water levels could be present within the gravels and made ground. However, perched water levels can vary seasonally and are prone to rapid changes through heavy rain events on permeable surfaces, accidental events (such as burst water mains) and the introduction of new underground construction causing blockages to natural perched water flow.

No shallow groundwater was encountered in the exploratory holes undertaken by AAE investigations. Perched water was present in the Made Ground overlying the clay at depths of 1.6mbgl and 3.54mbgl, however, this is not considered to be a sensitive controlled water receptor.

Hydrogeology and Hydrology

Environmental Agency Aquifer Classification

The Environment Agency’s (EA) new aquifer designation maps indicate that parts of the Application Site are underlain by a Secondary A Superficial aquifer. The Bedrock Aquifer is described as an Unproductive Strata – typical to the London Clay formation.

A Secondary A aquifer is defined by the EA as permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers. These are generally aquifers formerly classified as minor aquifers.

London Clay effectively divides London hydrology into two units: upper aquifer, primarily formed by Pleistocene terrace deposits and lower aquifer, primarily formed by Upper Chalk often in combination with the overlying Thanet Beds. London Clay should be classified as a non-aquifer, considered to have negligible permeability and should provide a natural barrier to prevent contaminants migrating to the deep Thanet Sands and Chalk aquifers.

The groundwater vulnerability map defines the Application Site as having unproductive-low vulnerability.

The EA has defined Groundwater Source Protection Zones (SPZs) for sources used in the supply of public drinking water. The Application Site is not located within a SPZ.

Hydrology

The Application Site lies in close proximity to the River Brent, located approximately 100m at the shortest point. The river is culverted beneath the adjacent site to the north (used as a recycling depot) running from east to west. Similarly, the canal feeder flowing generally parallel with the River Brent is also culverted within the Application Site boundary.

Other than the northwest section of the Application Site, there is limited hydro connectivity between the Application Site stratum and controlled waters.

Contamination

A site walkover was completed in November 2021 by AAE to assess the current site uses and land condition. Access was restricted to the external areas of the Application Site only. Most of the Application Site is capped by buildings and permanent hardstanding in good condition. No evidence of significant contamination or land uses of concern were noted.

Unit 2 comprises a Materials Recovery Facility, with external yard area, sub-station and weighbridge. All waste management activities take place within the main building, which has a sealed drainage system and controls the management of fugitive emissions (dust and odour). There is the small scale bunded storage of engine oils and lubricants on the northern site area, with spill kits present in the event of accidental leaks. No evidence of staining or spillage was observed.

Unit 3 comprises a parcel distribution warehouse, including external parking and yard loading area. The unit is a well-maintained facility and at the time of the visit an ancillary temporary building/office was being constructed. The warehouse has a high through-put of delivery and collection vehicles and staff involved in parcel distribution. No evidence of contamination or large-scale fuel/chemical storage was observed.

Unit 4 comprises a car part sales and distribution warehouse, including external car parking. A backup generator and bunded fuel tank are present on the east of the Application Site, along with a waste compactor and external (un-bunded) storage area for oil drums. The main building is surrounded by well-maintained hardstanding with no evidence of contamination or oil spills/leaks.

The ground investigations by ECUS and AAE/Careys recorded elevations of contaminants (metals, Total Petroleum Hydrocarbons (TPH) and Polycyclic Aromatic Hydrocarbons (PAH)) in the Made Ground which exceeded the adopted commercial/industrial Soil Guidance Values (SGVs). The recorded contaminants are consistent with the historical land uses at the Application Site, notably the former railway sidings and poorly maintained interceptors.

The existing development includes a cap consisting of concrete, stone and Macadam. Other than the capping of the Application Site it is considered unlikely that any historic remediation of the Made Ground was undertaken during construction in the early 1990’s. The levels identified in previous surveys are expected to reflect the current quality of the ground conditions.

5.2.6.2 Likely Effects during Construction and Operation

Based on the assessment results, the following risks have been identified and their significance evaluated:

- **Human health risk (dermal contact/ingestion/inhalation of particulates):** Due to the nature of the contamination, the presence of capping and structures at the Application Site results in there being no dermal or ingestion contamination linkages. In the event of re-development, it is anticipated that the capping would be required over operational areas and soft-landscaping would require the import of suitable soils;
- **Human health risk (inhalation of hazardous ground gas / volatile gas):** It is anticipated that no detailed ground gas risk assessment has been completed for the existing structures at the Application Site. The shallow nature of the Made Ground and the well-ventilated nature of the buildings renders the existing ground gas and vapour risk as low. In the event of development, a ground gas assessment is required and suitable mitigation incorporated into the design. Other than the adoption of gas membranes within the floor slab no further mitigation is considered likely; and
- **Risk to controlled waters:** The Application Site is predominantly capped with impermeable hardstanding and positively drains to a public sewer located in Great Central Way. Due to the presence of the impermeable concrete and macadam surfacing there is limited opportunity for leaching of contamination. In addition, the Application Site is predominantly underlain by unproductive strata and there is no significant groundwater resource. In the northwest of the Application Site there is a pathway to the River Brent, however given the capping and drainage the pathways are considered limited and the risk is considered to be low.

In its current condition, the Application Site does not pose a significant risk to present users or surrounding sensitive receptors, including controlled waters. However, a Phase 1 Contaminated Land Assessment will be undertaken to evaluate and understand the potential for land contamination. This will involve both desk-based research and a site walkover to identify potential sources of contamination, receptors, and pathways.

5.2.6.3 Conclusions

For the ground conditions assessment, no significant environmental effects are anticipated during the construction, operation, or decommissioning phases of the Proposed Development.

The forthcoming OPA will be supported by a suite of technical documents, including a Phase 1 Contaminated Land Assessment, to ensure that all potential impacts are appropriately considered and by Brent Council when determining the OPA.

5.2.7 Major Accidents and Disasters

SLR Consulting has been commissioned by the Applicant to prepare this section on Major Accidents and Disasters

5.2.7.1 Baseline Conditions

There are no known Control of Major Accident Hazards (COMAH) sites within 500m of the Application Site.

5.2.7.2 Likely Effects during Construction and Operation (including Mitigation)

The Proposed Development is not one that has an inherently high risk from major accidents and disasters (natural disasters or COMAH sites). Furthermore, the Proposed Development does not include any land uses considered likely to result in major accidents or disasters, i.e. it is not a nuclear site or heavy industrial site that stores large quantities of fuels or explosive materials.

During construction, the risk of accidents will be appropriately mitigated by undertaking works in accordance with the measures set out in a CEMP and through the use of best practice health and safety measures on-site.

5.2.7.3 Likely Effects during Operation (including Mitigation)

During operation, the risk of vehicle accidents will be appropriately mitigated through the design of the Application Site accesses, which will meet the required design standards and will be subject to a Road Safety Audit.

5.2.7.4 Conclusions

For the Major Accidents and Disasters assessment, no significant environmental effects are anticipated during the construction, operation, or decommissioning phases of the Proposed Development.

The forthcoming OPA will be supported by a suite of technical documents, including a CEMP, to ensure that all potential impacts are appropriately considered and by Brent Council when determining the OPA.

5.2.8 Noise and Vibration

Sharps Redmore Partnership Ltd has been commissioned by the Applicant to prepare a Noise Impact Assessment and a full copy of the assessment will be provided with the application. The following sections summarise the findings.

5.2.8.1 Maximum Development Scenario

For the purposes of this request for a screening opinion, the Noise and Vibration assessment has been undertaken using a maximum development scenario. This approach ensures that the parameters with the greatest potential to result in significant environmental effects are assessed. By adopting this worst-case scenario, it can be reasonably assumed that any alternative or lesser design options would result in impacts of no greater significance.

For noise and vibration, the key parameters for assessment are:

- Noise and Vibration from construction phase (including construction traffic); and
- Noise from operational phase (including operational traffic).

5.2.8.2 Baseline Conditions

The Application Site sits to the east of the wider Wembley masterplan area in a predominantly industrial area. The existing use of the Application Site includes waste recycling plant, logistics hub and commercial car parts. The Application Site is bordered by rail lines to the north, south and east.

Noise and vibration impacts attenuate over distance; hence the study area has identified the closest noise sensitive receptors to the Application Site. These are shown in **Plate 5.4** and detailed in **Table 5.2**.

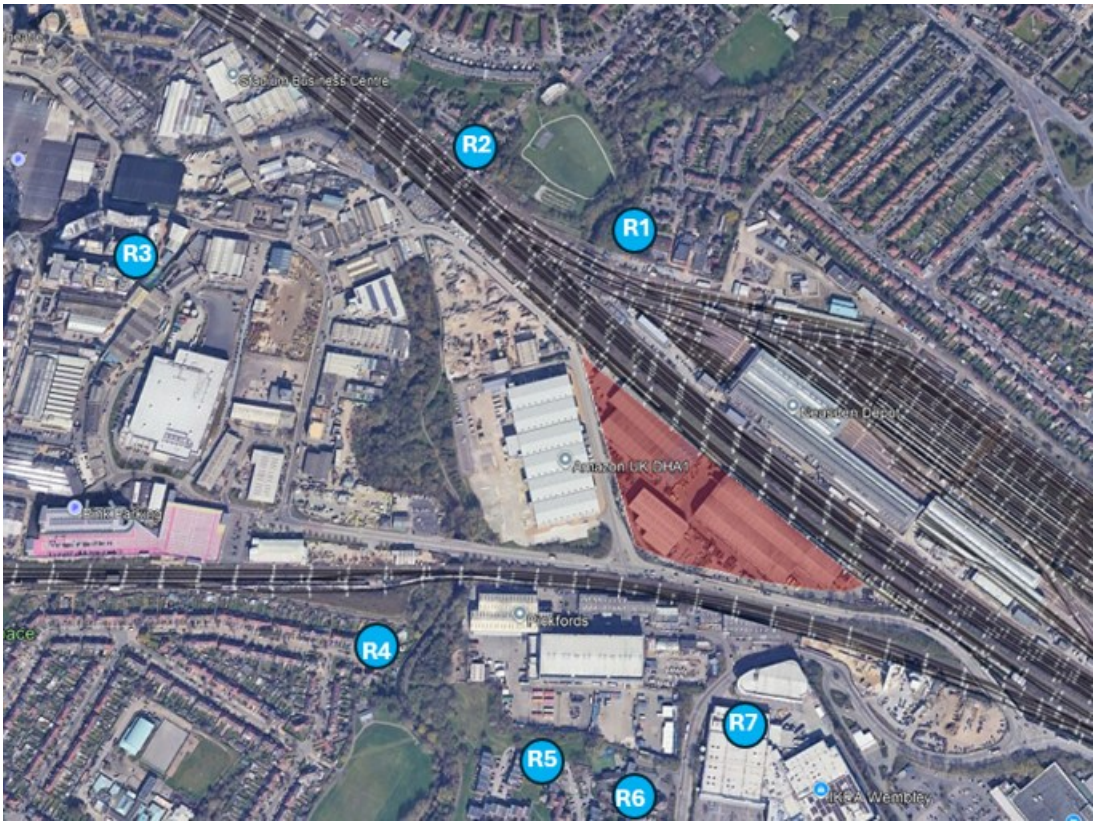


Plate 5.4: Noise Sensitive Receptors within the Noise and Vibration Study Area

Table 5.2: Noise Sensitive Receptors

Receptor Reference	Location	Classification
R1	Cambridge Court	Residential
R2	St Davids Close	Residential
R3	Unite Student Buildings	Residential
R4	Park View	Residential
R5	Lovett Way	Residential
R6a	Phoenix Arch School	Educational
R6b	St Patricks RC Church	Church
R7	IKEA	Commercial

To establish existing baseline noise levels, a noise survey was carried out between 15th and 18th July 2025. The measurement locations are shown in **Plate 5.5.** This included a 24-hour monitoring period at the Application Site (Location A), as well as short-term measurements at Locations B to F. These surveys' location were chosen to be representative of the noise sensitive receptors identified. The survey results are summarised in **Plate 5.6,** and **Table 5.3**.

Plate 5.5: Baseline Noise Survey Locations

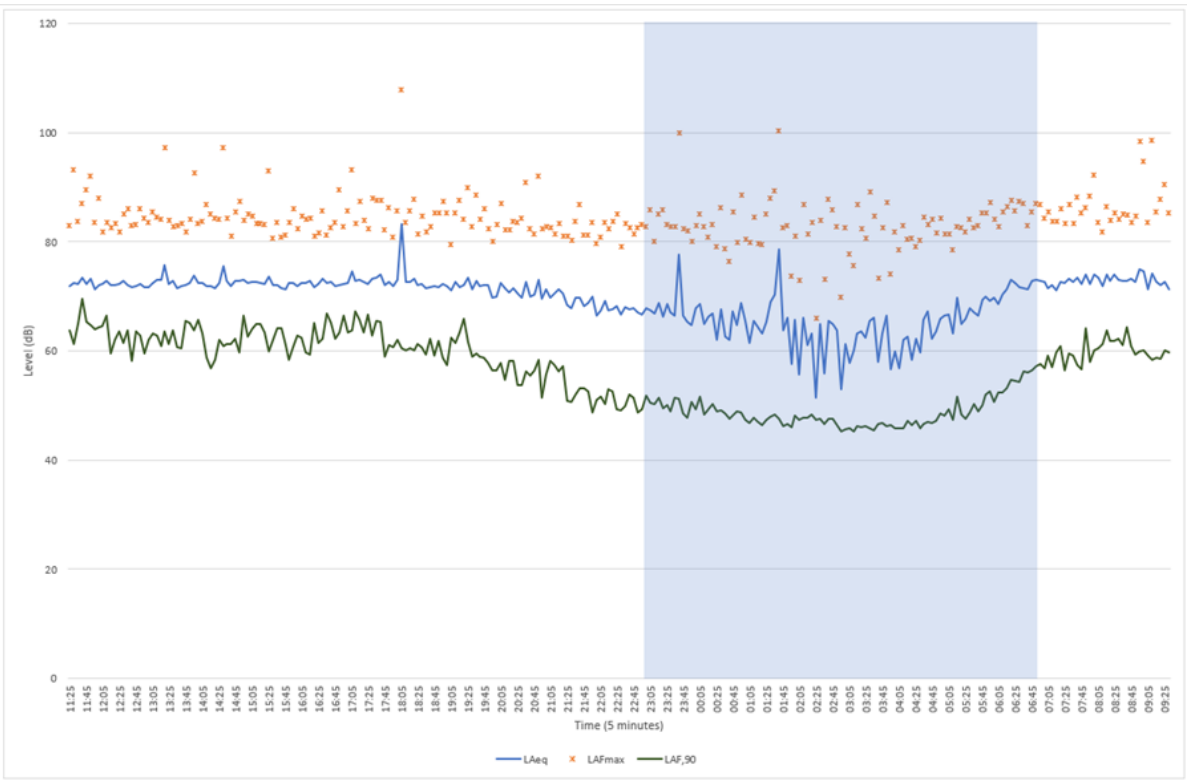


Plate 5.6: Survey Results at Location A

Table 5.3: Survey Results at Locations B to F

	Daytime (0700 – 2300hrs)		Nighttime (2300 – 0700 hrs)		
	$L_{Aeq,T}$ dB	$L_{A90,T}$ dB	$L_{Aeq,T}$ dB	$L_{A90,T}$ dB	L_{Afmax} dB
B	45 - 54	41 - 49	36 - 40	35 - 36	51 - 65
C	49 - 58	39 - 54	36 - 40	34 - 35	55 - 64
D	49 - 61	45 - 54	41 - 42	39 - 40	50 – 52
E	47 - 54	43 - 49	40 - 42	39 - 40	58 - 66
F	50 - 55	48 - 49	41 - 45	38 - 40	67 - 63

The results show that during the daytime, existing noise levels are characterised by road traffic, rail noise and noise from existing industrial activity. During the nighttime period, noise levels industrial activity were lower and therefore, background noise levels were dictated by road and rail noise.

5.2.8.3 Likely Effects during Construction (including Mitigation)

On-site construction activity

The most notable sources of noise and vibration during the demolition and construction phase would be expected to be during site clearance, earthworks, construction of Application Site infrastructure and construction of sub-structures. The level of noise will be dependent on the location activities on a daily basis and the equipment used, with noise levels being attenuated as the distance between source and receptor increases.

Adverse noise and potentially vibration effects could occur when construction works are being undertaken close to the Application Site boundary. However, it is anticipated that noise

and, if required, vibration would be controlled through the implementation of a CEMP. The CEMP would include industry standard control measures such as undertaking works during hours agreed with Brent Council as the LPA, community liaison and adhering to Best Practicable Means to minimise noise and vibration effects with reference given to the guidance provided within BS 5228-1:2009+A1:2014[8] . These mitigation measures would be considered an integral part of the Proposed Development and considered as part of the CEMP. These measures include but are not limited to the following:

- Site hoardings to provide acoustic barrier to construction works;
- Positioning of fixed plant items to maximise distance and natural screening between plant areas and nearest noise sensitive receptors;
- Machines in intermittent use will be switched off when not in use;
- Where possible equipment powered by battery or mains power will be used in preference to equipment powered by internal combustion engine;
- Plant will be maintained in good working order so that noise from vibration is minimised;
- Noise monitoring will be carried out during the entirety of the construction phase to measure noise levels;
- Restriction of hours of work in accordance with Local Authority requirements; and
- Hydraulic construction methods will be used in preference over percussion techniques where practical.

Taking into account the distance to noise-sensitive receptors, existing daytime noise levels, and the mitigation measures that can be implemented through a CEMP, it is considered unlikely that noise or vibration during the construction phase will result in significant adverse effects on the identified sensitive receptors.

Construction Traffic

With regard to impact of construction traffic, this will be determined by a comparison of traffic data with and without the Proposed Development using the formula in the Calculation of Road Traffic Noise (CRTN) below.

Change in Noise Level (dB) = 10 log (Predicted traffic flow/existing traffic flow)

The magnitude of impact from change in noise level is shown in Table Table 5.4: Magnitude of Impact from Change in Noise Levels

Table 5.4: Magnitude of Impact from Change in Noise Levels

Magnitude	Criteria
Major	Greater than 10 dB change in sound level or sound produced in excess of 10 dB above baseline levels or recommended guidelines
Moderate	Greater than 5 and less than 10 dB change in sound level or sound produced between 5-10 dB above baseline levels or recommended noise guideline values
Minor	Greater than 3 and less that 5 dB change in sound level or sound produced between 3-5 dB above baseline noise levels or recommended noise guideline values

[8] British Standards Institution (BSI), 2014. BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise. London: BSI. Available at: https://doi.org/10.3403/30141421

Magnitude	Criteria
Negligible	Less than 3 dB change in sound level or sound level less than 3dB above baseline levels or recommended noise guideline values

To have any noticeable impact (3dB), construction traffic will need to double existing traffic flows. The level of construction traffic compared to existing traffic is likely to low and not considered likely to cause any adverse impact.

A construction traffic management plan will be part of the CEMP and as above, noise from construction traffic will not be considered further in the ES.

5.2.8.4 Likely Effects during Operation (including Mitigation)

The significance of noise impacts arising from activities at the Application Site will depend on its final operational use. The most prominent sources of noise during the operational phase are expected to include servicing activities, vehicle movements, noise breakout from buildings, and mechanical services plant, including waste management equipment. These sources have the potential to adversely affect the identified noise sensitive receptors.

Based on the types of proposed uses of the Proposed Development, it is not considered that adverse effects would occur with respect to vibration in the operational phase. Therefore, operational vibration is not considered to be significant and will not be considered further in the EIA.

The current national guidance on the assessment of industrial and commercial noise is BS 4142:2014+A1:2019[9] Methods for rating and assessing industrial and commercial sound. In accordance with the advice in BS 4142 the magnitude of the noise will be determined by comparing predicted rating noise level (predicted specific level LAeqT corrected to take into account any features such as impulsivity, tonality or intermittency) from industrial activity to existing background noise levels. The greater the exceedance of the rating level over the background noise level the greater the impact. Where the rating level does not exceed the background noise level the impact can be considered low.

It is clear from BS 4142 that any assessment of industrial/commercial noise must be considered in context in which the sound occurs, for example noise from back-up generators only used in emergencies when there are power outage or short periods when tested. In these cases, the magnitude of the impact would be reduced.

To mitigate the impact of noise from operational activity the design of the Proposed Development will take into account good acoustic design principles, and where possible using the built form to screen noise sources such as external service yards, which will be supplemented by localised screening where necessary. Noise from plant will be controlled by selection of plant, acoustic screening and where necessary through the use of in-line noise attenuators to meet the LPA's requirements.

Where physical mitigation measures are not sufficient operational mitigation measures such as restriction on type of use, hours of operation will be considered. These can be secured through the use of planning conditions.

Operational Traffic

As advised above in relation to construction traffic to have any noticeable impact (3dB) traffic flows on surrounding links would need to double. It is understood from the Traffic and

[9] British Standards Institution (BSI), 2019. BS 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound. London: BSI. Available at: https://doi.org/10.3403/30268408

Transport Assessment (Section 5.2.11) carried out, even under a 'worst case' scenario where the Site is used for multi-level logistics, the projected increase in traffic would remain well below the threshold required to cause a perceptible impact. Further detail regarding operational traffic is discussed in section 5.2.11.4.

5.2.8.5 Conclusions

For the noise and vibration assessment, taking into account mitigation measures available no significant environmental effects are anticipated during the construction, operation, or decommissioning phases of the Proposed Development.

The forthcoming OPA will be supported by a suite of technical documents, including a Noise Impact Assessment, to ensure that all potential impacts are appropriately considered and by Brent Council when determining the OPA.

5.2.9 Socio-economics

Quod has been commissioned by the Applicant to review socio-economic considerations for the purposes of the application. The following sections summarise the findings.

5.2.9.1 Likely Worst-case Scenario

For the purposes of this request for a screening opinion, the socio-economic assessment has been undertaken using a worst-case scenario. This approach ensures that the parameters with the greatest potential to result in significant environmental effects are assessed.

In the context of socio-economics, this means assessing the scenario expected to result in the least number of jobs. This will establish whether the proposals are likely to reduce the number of jobs accommodated by the Application Site and, if so, whether any reduction represents a significant effect. By adopting this worst-case scenario, it can be reasonably assumed that any of the other design scenarios would result in impacts of no greater significance.

5.2.9.2 Baseline Conditions

Baseline analysis has been undertaken to establish the sensitivity of socio-economic receptors in the context of the potential effects arising from the Proposed Development. The following receptors are considered to be potentially sensitive to socio-economic effects arising from the proposals:

- The construction industry and its employees;
- Existing employees and businesses; and
- The local and regional economy and labour market.

The Application Site is in the Stonebridge ward of the London Borough of Brent. The Application Site is currently in logistics, recycling and industrial use and is surrounded by similar uses immediately to the west, south and east and bounded by a railway line to the north/north-east. The Application Site as a whole is designated as SIL and is within the Wembley Growth Area/Opportunity Area – as defined by the Brent Local Plan and London Plan, respectively. Part of the Application Site is also subject to a 'safeguarded waste site'

designation. Policy BE2 of Brent's Local Plan[10] identifies this SIL as being appropriate for intensification.

Based on standard job densities and information known about the Application Site, it currently has up to 210 jobs on-site (full-time equivalent (FTE)). Total existing floorspace on-site is approx. 26,176.80m^2 (GIA).

Data from the Business Register and Employment Survey (BRES) (2023)[11] shows that the total number of jobs based in the Stonebridge ward is approximately 23,560. This figure represents nearly a fifth of all jobs based in Brent as a whole which highlights the role of this area in the Borough's economy. The sectors which make up the most significant proportion of jobs include: 'Manufacturing'; 'Transport & Storage'; and 'Wholesale' – collectively, these account for nearly half (47%) of all jobs in the ward area. The claimant count rate in Stonebridge is 15.9%, significantly higher than the London average of 6%. Given the number of jobs based in the Local area, it is considered that small changes to employment figures would not have a significant impact on the economic role of the area, however high rates of unemployment mean a local economy potentially more sensitive to fluctuations in the job market – therefore, the local economy is considered to be a medium sensitivity receptor.

Construction employment, due to its mobile nature, tends to be considered at a regional level. Data from the Construction Industry Training Board (CITB)[12] indicates that there are approximately 387,000 construction jobs based in London who are highly mobile and agile in response to demand. On this basis, the construction industry is considered to be a low sensitivity receptor.

5.2.9.3 Likely Effects during Construction, including Mitigation

The Proposed Development is likely to generate temporary employment opportunities during the construction phase. However, due to the mobile nature of the construction industry, any effects would need to be considered at a regional level and in the context of the existing estimate of 387,000 construction jobs based in London, the effect of the Proposed Development will be beneficial but is not likely to be significant.

5.2.9.4 Likely Effects during Operation, including any Mitigation

The main socio-economic effects likely to arise from the Proposed Development will be direct employment effects associated with the end-uses on-site and indirect local economic effects associated with employee spending. However, these effects will need to be considered in the context of the existing baseline to ascertain the net change in direct employment and associated spending likely to result from the Proposed Development.

As part of this Screening Report, the development scenarios set out in Section 3 have been assessed to understand the likely employment effects of each. Employment densities set out within the Homes and Communities Agency guidance[13] have been applied to the max floorspaces provided for each land use type (including for data centre floorspace).

The employment effects of a data centre are difficult to estimate at this stage of the development process, as the type of operator can have a significant impact on the employment density and this is not yet known. Depending on the data centre employment density, there could be a reduction in the number of jobs on-site, which in the context of the

[10] London Borough of Brent, (2022). Brent Local Plan 2019-2041

[11] Office for National Statistics (2023). Business Register and Employment Survey.

[12] Construction Industry Training Board, (2024). Construction Workforce Outlook – Labour Market Intelligence Report 2025-2029.

[13] Homes and Communities Agency (2015). Employment Density Guide – 3rd Edition.

existing baseline, this represents 0.9% of total employment in the local area. Therefore, this change is not considered to be a significant effect.

Given the expected potential change to employment levels on-site, the associated net change in employee spending effects are not expected to be significant.

Datacentres play a strategic economic role in the economy and have been identified as Critical National Infrastructure by the UK Government. As such, scenarios including a data centre would have positive and potentially significant effects on the economy at a local and regional level. In the absence of a datacentre, this potentially significant effect would not be assessed.

5.2.9.5 Conclusions

Given the range of options proposed for the socio-economic assessment, no significant environmental effects are anticipated during the construction, operation, or decommissioning phases of the Proposed Development.

5.2.10 Townscape and Visual Impact

Turley Heritage and Townscape has been commissioned by the Applicant to prepare a Built Heritage and Townscape Statement, and a full copy of the assessment will be provided with the application. The following sections summarise the findings.

5.2.10.1 Maximum Development Scenario

For the purposes of this request for a screening opinion, the townscape assessment has been undertaken using a maximum development scenario (i.e. the maximum possible extents of built form for any of the Proposed Development). This approach ensures that the parameters with the greatest potential to result in significant environmental effects are assessed. By adopting this worst-case scenario, it can be reasonably assumed that any alternative or lesser design options would result in impacts of no greater significance.

5.2.10.2 Baseline Conditions

Townscape

The Application Site is located within an area characterised by large-scale light industrial and commercial buildings, large areas of car parking/hard landscaping and arterial routes, bounded by the railway sidings to the north (up to Village Way), the North Circular Road (A406) to the east and south and the River Brent to the west. It is identified in the Wembley Area Action Plan as a SIL/Wembley Industrial Est.

To the north and south of this area are finer-grain, 20th century residential neighbourhoods. There is an area of special townscape character to the north, designated as the Neasden Conservation Area (see section 5.2.3).

To the west is Wembley Stadium. The stadium and immediate surrounding have been identified as a Strategic Cultural Area within the Wembley Area Action Plan. This area has undergone substantial redevelopment over recent years including new residential tower blocks and cultural venues.

As part of the Built Heritage and Townscape Statement, townscape character areas (TCAs) will be identified, aligned with the above analysis. The likely impacts of the Proposed Development on these TCAs will then be assessed as part of the final report.

Visual Context

An initial ZTV has been produced by the project architects to aid in understanding the potential visual impacts of the Proposed Development, see **Plate 5.1**. The ZTV has been produced in Vu.City, which does not account for the screening effect of existing and established tree canopies, which can give the impression of greater areas of visibility in some areas than there is in reality. A final version of the ZTV will be prepared by appointed visualisation consultants in due course and will be included within the Built Heritage and Townscape Statement.

The initial ZTV shows potential visibility along the existing underground lines running north-west to south-east. There is also potential visibility shown to the north-west within St David's Close Playing Fields and along the River Brent. To the south, potential visibility is contained within Great Central Way/South Way and some of the existing large areas of car-parking.

The initial ZTV has been used to identify visual receptors that will likely be impacted by the Proposed Development, namely:

- Users of Brent River Park;
- Users of St David's Close Playing Field;
- Passengers on the Metropolitan and Jubilee Underground lines; and
- Motorists and pedestrians travelling along Hannah Close and Great Central Way.

Likely Views

Brent Local Plan, under Policy BHC2 National Stadium Wembley, identifies 17 views of Wembley Stadium where development must preserve and enhance its architectural integrity.

Two of these views are located within the vicinity of the Application Site and will be scoped into the townscape assessment:

- View 11 Great Central Way.
- View 14 Neasden Station, Neasden Lane

Of the other 15 identified views, most are not orientated towards or include Application Site and, in this context, will not be affected by the Proposed Development. There are three viewpoints located to the west of Wembley Stadium that look eastwards. Although the line of sight of these views includes Application Site, given the distances involved as well as the intervening-built form, the Proposed Development is unlikely to impact in these views. This is supported by the initial ZTV produced, which does diminishing potential visibility to the west of Application Site.

In addition to the two locally designated views identified above, we have identified six additional likely views located within both the built heritage receptors (identified in the built heritage section) as well as from townscape character areas and visual receptors. These have also been informed by the ZTV above. Additional likely views include:

- View from Verney Street (located within the Neasden Conservation Area);
- View from Brent River Park;
- View from The Grange;
- View from St David's Close Playing Field;
- View from Hannah Close; and
- View from Great Central Way.

The initial findings of the townscape and visual baseline, as set out above, will be tested on the Application Site through a site walkover and informed by the final iteration of the ZTV produced by the appointed visualisers.

5.2.10.3 Likely Effects during Construction (including Mitigation)

Construction effects will likely include hoarding, portacabins, large equipment and construction traffic in and around the Application Site. These magnitude of impact of these effects will be greatest within the immediate vicinity of the Application Site, decreasing with distance and intervening built form. Due to their temporary nature and mitigation methods which could be secured through a CEMP, the overall scale of the construction effects is unlikely to be significant.

5.2.10.4 Likely Effects during Operation (including Mitigation)

The Proposed Development would introduce new built form of scale into Application Site and would have a direct impact on the TCA including the Application Site. It would have an indirect impact on the other TCAs identified – i.e., residential areas to the north and south and Wembley to the west. The use options proposed for the Application Site are aligned with the wider townscape character of the area and will retain its existing character. Landscaping and greening opportunities could also improve the general townscape quality of the Application Site and soften the dominance of hard landscaping within the wider area.

The Proposed Development will entail transformational change within the Application Site, but it will be in-keeping with both the existing use character and scale of the surrounding development. In this context, any potential townscape and visual impacts are unlikely to be significant. This is supported by the initial ZTV which shows constrained areas of potential visibility. Where The Proposed Development may be visible to receptors and in the identified views, the Application Site is already experienced within the context of other light industrial/large-scale commercial buildings. In this context, the Proposed Development would be in-keeping with the established character of these areas.

5.2.10.5 Conclusions

For the townscape assessment, no significant environmental effects are anticipated during the construction, operation, or decommissioning phases of the Proposed Development.

The forthcoming OPA will be supported by a suite of technical documents, including Built Heritage and Townscape Statement, to ensure that all potential impacts are appropriately considered and by Brent Council when determining the OPA.

5.2.11 Traffic and Transport

WSP UK has been commissioned by the Applicant to prepare a Transport Assessment, and a full copy of the assessment will be provided with the application. The following sections summarise the initial findings.

5.2.11.1 Maximum Development Scenario

For the purposes of this request for a screening opinion, the initial Transport Assessment has been undertaken using a maximum development scenario. This approach ensures that the parameters with the greatest potential to result in significant environmental effects are assessed. By adopting this worst-case scenario, it can be reasonably assumed that any alternative or lesser design options would result in impacts of no greater significance.

For traffic and transport the key parameters for assessment are:

- Quantum of proposed floor area;

- Quantum of proposed parking and loading provision;
- Operational hours, staff shift times and patterns; and
- Maximum staff number.

5.2.11.2 Baseline Conditions

Access Arrangements

The Application Site is currently accessed via two priority junctions on Hannah Close.

The main Application Site access is located on Hannah Close approximately 125m north of the signalised junction with the B4557 Great Central Way. This access provides entry to the wider Application Site via the existing internal road network. Footways and street lighting is provided on both sides of Hannah Close and along the Application Site's internal access road.

A secondary access which is around 100m north of the main Application Site access is located at the northwestern corner of the Application Site and currently only allows servicing vehicles to access the service yard of the existing westernmost warehouse.

An access count survey of the Application Site was undertaken in 2023 and augmented in 2025, which has shown that the Application Site currently generates in the region of 2,500 daily two-way vehicle trips.

Table 5.5: Existing Site Trip Generation

Trip Rates	Daily (24hr)		
	In	Out	Total
Car	644	643	1,287
LGV	404	407	811
HGV	195	202	397
Total Vehicles	1,243	1,252	2,495

Pedestrian and Cycle Access

There is a comprehensive pedestrian network around the Application Site. Footways are provided on both sides of the carriageway on all roads surrounding the Application Site. Street lighting is provided at regular intervals.

An off-street shared pedestrian cycle route is accessible at the northern end of Hannah Close. This route follows the River Brent passing Stonebridge Park station in the south.

Quietway 3, a cycle route that runs between Regent's Park and Gladstone Park, lies approximately 2.7km cycle distance to the east of the Application Site. It can be reached via a ramped over path across the A406 North Circular Road. Brent Council is proposing upgrades to the existing Quietway 3 route, including junction improvements and wayfinding road markings and signs.

Public Transport Access

The Application Site has a Public Transport Accessibility Level (PTAL) rating of 1b (6 being the highest and 1b being the lowest), which indicates a poor level of public transport accessibility at present.

Even though the PTAL level is low, the Application Site is reasonably well served by buses with a bus stop a 3-minute walk away from the Application Site on Great Central Way

(Hannah Close bus stops). This bus stop is served by route 92 and 206 services, which provide services every 10-12 minutes and 11-13 minutes, respectively.

The closest London Underground station to the Application Site is Wembley Park station, which lies approximately 1.6 km to the west of the Application Site and thus can be accessed via an approximate 22-minute walk from the centre of the Application Site. Wembley Park station provides access to Jubilee and Metropolitan lines services.

The closest rail station to the Application Site is Wembley Stadium station, which lies approximately 1.9 km to the west of the Application Site, provides access to Chiltern Railways services between London Marylebone and numerous destinations north of London. The station can be accessed via an approximate 27-minute walk or via bus route 440, which provides one service every 15 minutes, and 92 / 206 bus services which run a frequency of one service every 10-13 minutes.

Vehicular Access

With regards to the highway network, the Application Site is well connected. It is circa 1.3km drive from the A406, a ring road around Central London, which connects to trunk roads and major motorways including the M4, M1 and M11. The M25 can be accessed within a 30-minute drive either via the A40/M40 or the M1.

The location of the Application Site therefore makes it ideal for an urban logistics use with access to the strategic highway networks.

Traffic surveys for the Application Site have been undertaken by the applicant as part of the assessment process. These were undertaken in April 2023 and augmented in June 2025 in order to provide a robust set of data for the assessment of the potential impacts of the Proposed Development. In total, seven junctions in the vicinity of the Application Site have been surveyed, in addition to the current site access points.

Parking Arrangements

Car parking, in the form of designated car parks as well as on-street parking along the Application Site's internal access road network, is currently provided in various locations on the Application Site. Currently there are approximately 150 car parking spaces and around 40 van parking spaces in addition to 18 HGV loading docks excluding the Amazon site, which has not yet been surveyed on the Application Site as a whole.

5.2.11.3 Likely Effects during Construction (including Mitigation)

While currently no information is available regarding the volume of traffic to be generated during the construction phase of the Proposed Development, it is considered unlikely that the volume of construction traffic will exceed the current quantum of vehicle trips generated by the Application Site. As such, it is considered unlikely that the construction of the Proposed Development will generate any significant adverse effects relating to traffic and transport.

It should be noted that the construction traffic routes, movements and associated effects such as driver disruption, dust and dirt nuisances would be dealt with through good practice measures and managed through adherence to the CTMP.

5.2.11.4 Likely Effects during Operation (including any Mitigation)

An initial assessment of the likely worst-case trip generation of the Proposed Development indicated that the proposed logistics land use (considered to be a reasonable worst-case land use from a trip generation perspective) of a maximum floor area of 71,000m^2 would result in approximately 2,500 two-way vehicle trips per day, which represents an overall increase in the trip generation at the Application Site by circa 10 two-way vehicle trips in

comparison to existing land uses. This is consistent with the parking reduction for staff cars on the Application Site, however there is an increase in LGV and HGV traffic, as a result in the intensification of logistics use on the Application Site.

Table 5.6: Site Initial Trip Generation

	Daily (24hr)		
	In	**Out**	**Total**
Car	321	321	642
LGV	636	479	1115
HGV	402	347	749
Total Vehicles	1359	1147	2506

Table 5.7: Initial Net Trips

	Daily (24hr)		
	In	**Out**	**Total**
Car	-323	-322	-645
LGV	232	72	304
HGV	207	145	352
Total Vehicles	116	-105	11

To determine the environmental effects of the change in traffic flows, a study area must be defined. In accordance with IEA guidelines there are two broad rules of thumb that should be used as a screening process to limit the scale and extent of the assessment. These are as follows:

- *"Rule One include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%)*
- *Rule Two include any other specifically sensitive areas where traffic flows have increased by more than 10% or more"*

The following Table shows the anticipated percentage impact on links surrounding the Site.

Table 5.8: Initial Percentage Increase Assessment

Link	2023 Baseline			Net Development Trips			Base + Net Development Trips			% increase	
	AADT	HDV	HDV%	AADT	HDV	LGV	AADT	HDV	HDV %	AADT	HDV
Hannah Close (south of main site access)	5,046	889	17.6%	114	300	255	5,160	1,189	23.0%	2.2%	5.4%
Great Central Way (east of Hannah Close)	18,288	1,690	9.2%	113	274	249	18,401	1,964	10.7%	0.6%	1.4%
A406 (north of Great Central Way)	109,281	6,299	5.8%	175	101	83	109,456	6,400	5.8%	0.2%	0.1%
A406 (south of Drury Way)	103,246	6,571	6.4%	51	85	25	103,297	6,656	6.4%	0.0%	0.1%

As shown, no link will be subject to a traffic or HGV flow increase of more than 30%. The site is also situated in an industrial area with no sensitive receptors in proximity of the site.

Therefore, the Proposed Development is not considered to result in significant Traffic and Transport effects once operational.

5.2.11.5 Conclusions

For the traffic and transport assessment, no significant environmental effects are anticipated during the construction, operation, or decommissioning phases of the Proposed Development.

The forthcoming OPA will be supported by a suite of technical documents, including Transport Assessment, Framework Travel Plan, Delivery and Servicing Plan, Outline Car Parking Design and Management Plan and Outline Construction Logistics Plan, to ensure that all potential impacts are appropriately considered by Brent Council when determining the OPA.

5.2.12 Water Environment

Evolve has been commissioned by the Applicant to prepare a Flood Risk Assessment (FRA) and a full copy of the assessment will be provided with the application. The following sections summarise the findings.

5.2.12.1 Baseline Conditions

Topography and Hydrology

A topographical survey of the Application Site was conducted by Site Engineering Surveys Ltd in April 2023 and shows the Application Site to be triangular in plan and relatively flat across the Application Site with levels varying between 34m Above Ordnance Datum (AOD) and 32m AOD. The Application Site is bounded by the Bedford-Brighton railway line to the north, Hannah Close to the West and Great Central way to the south. The nearest

waterbodies are the River Brent, located 250m to the west of the Application Site, and the head of a feeder arm to the Grand Union Canal 450m to the southeast of the Application Site.

Geology

Based on the information available from BGS online mapping[6] the geology of the Application Site is identified as:

- **Bedrock geology:** London Clay Formation - Clay, silt and sand. Sedimentary bedrock formed between 56 and 47.8 million years ago during the Palaeogene period; and
- **Superficial deposits**: Alluvium - Clay, silt, sand and gravel. Sedimentary superficial deposit formed between 11.8 thousand years ago and the present during the Quaternary period.

Additionally, soilscape information available from MAGIC[7] indicates this area as slowly permeable, seasonally wet, slightly acid but base-rich loamy and clayey soil.

Flood Risk

According to the EA Flood Map for Planning[14], the development boundary for the Application Site is located within Flood Zone 1, with a small portion in the north-west corner falling within Flood Zone 2, showing areas at risk of flooding from rivers or sea. Land within flood zone 1 has a low probability of flooding from rivers and the sea. This means, in any year, land has a less than 0.1% (1 in 1,000) chance of flooding from rivers or the sea

The yearly chance of surface water flooding at the Application Site is Very Low and remains Very Low between 2040 and 2060. Very Low risk means Less than 0.1% chance of a flood each year. There are small areas of surface water flooding shown on the Application Site, but these areas shown are likely to be the result of rainfall filling localised depressions in the hydraulic model used to develop the extents rather than distinct flow paths.

The EA reports that flooding from groundwater is unlikely in this area. Therefore, the risk can be considered low.

There is a risk of flooding from reservoirs in this area according to the EA. The Application Site is shown to be affected by reservoir flooding transmitted along the flow path of the River Brent. It should also be emphasised that the risk of flooding from reservoir breach is very small since the EA is the enforcement authority for the Reservoirs Act (1975) and all large, raised reservoirs are inspected and supervised by reservoir panel engineers. On this basis, the risk from reservoir flooding to the Application Site is considered to be low

5.2.12.2 Likely Effects during Construction (including Mitigation)

The risk of flooding from rivers and seas is considered low and, as the works will not occupy any critical flood plain storage, construction operations are therefore expected to have Negligible effects on flood risk from this source. Furthermore, there are anticipated to be Negligible effects on flood risk from groundwater, reservoirs, canals and existing sewers due to the absence or lack of interaction with these features, or their low sensitivity.

Stockpiling of materials, accidental blockage of existing drainage features or removal of these features during the construction stage may, in the short-term, have minor adverse effects on surface water flood risk prior to the implementation of the permanent drainage strategy. Construction activities may also have Minor Adverse effects on the quality of

[14] Environment Agency (2025). Flood Map for Planning. GOV.UK. Available at: https://flood-map-for-planning.service.gov.uk/triage [Accessed 14th August 2025].

surface water runoff as a result of spilled hydrocarbons/petrochemicals from construction plant and mobilisation of silts and contaminants during soil stripping and earthworks operations. This may lead to increased silt loading and pollution of nearby waterbodies.

To mitigate such risks, the Contractor responsible for the works will be required to prepare a CEMP compliant with relevant industry guidance for site management and surface water control. The CEMP will be secured by planning condition and set out methods by which construction will be managed to avoid, minimise and mitigate the adverse effects on the water environment identified above.

The surface water drainage strategy for the Proposed Development will utilise SuDS which will aim to restrict runoff volumes and rates from the Proposed Development to the equivalent greenfield values, protect or enhance water quality through filtration, adsorption and biodegradation of pollutants as well as providing increased biodiversity and amenity value.

5.2.12.3 Likely Effects during Operation (including Mitigation)

Reducing runoff rates and/or volumes into wider drainage networks will have beneficial effects risk of flooding in the wider area, particularly when considering the effects of cumulative developments which will employ a similar approach. As the proposed surface water drainage network will also be designed to accommodate flows for all storm events up to the 1 in 100-year event (including the necessary allowance for climate change), the risk of surface water flooding in the Proposed Development is also anticipated be reduced in comparison to the current scenario.

5.2.12.4 Conclusions

For the water environment assessment, no significant environmental effects are anticipated during the construction, operation, or decommissioning phases of the Proposed Development.

The forthcoming OPA will be supported by a suite of technical documents, including a CEMP, FRA and Drainage Strategy, to ensure that all potential impacts are appropriately considered and by Brent Council when determining the OPA.

5.2.13 Wind Microclimate

WSP UK has been commissioned by the Applicant to prepare a Wind Assessment, and the OPA will be supported by a technical report to provide confidence that the wind microclimate is suitable.

5.2.13.1 Baseline Conditions

The existing Site currently consists of several light industrial buildings, with heights ranging from 10m to 16m AOD, and is largely shielded from prevailing south-west and west wind directions by other light industrial buildings of similar or slightly greater height. Sensitive receptors in the area would be largely limited to pedestrian footways along both Hannah Close and the B4557 to the south of the Site.

5.2.13.2 Likely Effects during Construction and Operation (including Mitigation)

During construction, wind conditions are expected to gradually transition from the ones of the ‘Baseline’ to the ones experienced by the Proposed Development when in operation (see Section 5.2.13.3.

5.2.13.3 Likely Effects during Operation (including Mitigation)

Considering the Maximum Development Parameters, the proposed building heights would range from 20m to 39m AOD (see Appendix A), compared to immediately surrounding building heights of up to 25m AOD. It is expected that the changes brought to the local wind microclimate (both in terms of wind comfort and safety) would be minor.

5.2.13.4 Conclusions

For the wind microclimate assessment, no significant changes to the local wind microclimate are anticipated during the construction, operation, or decommissioning phases of the Proposed Development.

The forthcoming OPA will be supported by a suite of technical documents, including a wind assessment. This will be carried out to provide an overview of wind comfort and safety for the Maximum Development Parameters massing, which is the worst-case in terms of potential effect on the wind microclimate.

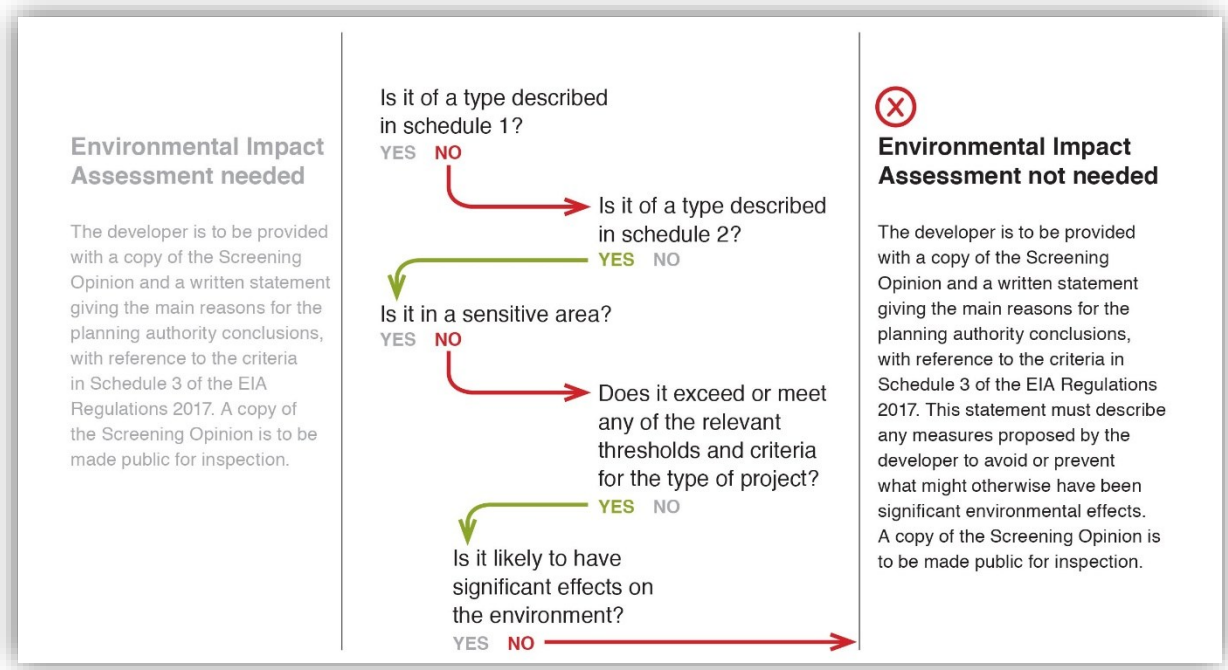
6.0 Conclusion

The Applicant is formally requesting a Screening Opinion from Brent Council to determine whether the Proposed Development constitutes an 'EIA development'.

This Request for a Screening Opinion has been prepared to provide relevant information to assist Brent Council in its determination and includes all of the information required under Regulation 6(2) of the EIA Regulations.

The Proposed Development has been assessed in accordance with the screening process set out in the EIA Regulations and this has concluded that:

- the Proposed Development is of a type described in Schedule 2;
- the Application Site is not located within a sensitive area;
- the Proposed Development is above relevant thresholds in the EIA Regulations;
- the Proposed Development is not considered to have significant environmental effects, either in isolation or cumulatively;
- the Proposed Development does not require an EIA.



Whilst the decision remains with Brent Council (as local planning authority), this report concludes that the Proposed Development including associated primary and secondary mitigation (in isolation and considered cumulatively) will not require an EIA, as it is considered unlikely to result in significant environmental effects.

In accordance with Regulation 6(6)(a), Brent Council must adopt a screening opinion within 3 weeks of receiving this Request.

As per Regulation 5(5), should Brent Council consider that it has not been provided with sufficient information to adopt a Screening Opinion, it may notify the Applicant of the points on which the additional information is required.

In the event that Brent Council agrees with the conclusion of this Request, it is envisaged that the following technical assessments would be submitted as part of a non-EIA OPA for the Proposed Development:

- Air Quality Assessment (incl AQ Neutral and AQ Positive);
- Arboricultural Impact Assessment;
- Archaeological Assessment;
- Built Heritage and Townscape Statement;
- Car Parking Design & Management Plan;
- Circular Economy Statement;
- Contaminated Land Assessment;
- Delivery & Servicing Plan;
- Design & Access Statement;
- Design Guideline;
- Development Specification;
- Ecology – BNG Assessment;
- Energy & Sustainability Strategy;
- Existing Plans;
- External Lighting Strategy;
- Fire Strategy;
- Flood Risk Assessment & Drainage Strategy (incl foul sewage capacity);
- Framework Construction Logistics Plan;
- Framework Operational Waste Management Plan;
- Framework Travel Plan;
- Landscape Strategy;
- Noise and Vibration Assessment;
- Parameter Plans;
- Planning Statement;
- Rail Infrastructure Assessment;
- Statement of Community Involvement;
- Transport Assessment;
- TV / Radio Reception Assessment;
- Utilities & Infrastructure Strategy (including digital connectivity);
- Waste Planning Statement / Assessment;
- Whole Lifecycle Carbon Assessment; and
- Wind Assessment.

Brent Council is invited to comment on this list of supporting technical assessments and any other pre-application guidance or validation requirements that the Applicant should take into account.

Appendix A Plans

Request for a Screening Opinion

Hannah Close, Wembley

British Land Properties Ltd.

SLR Project No.: 416.066410.00001

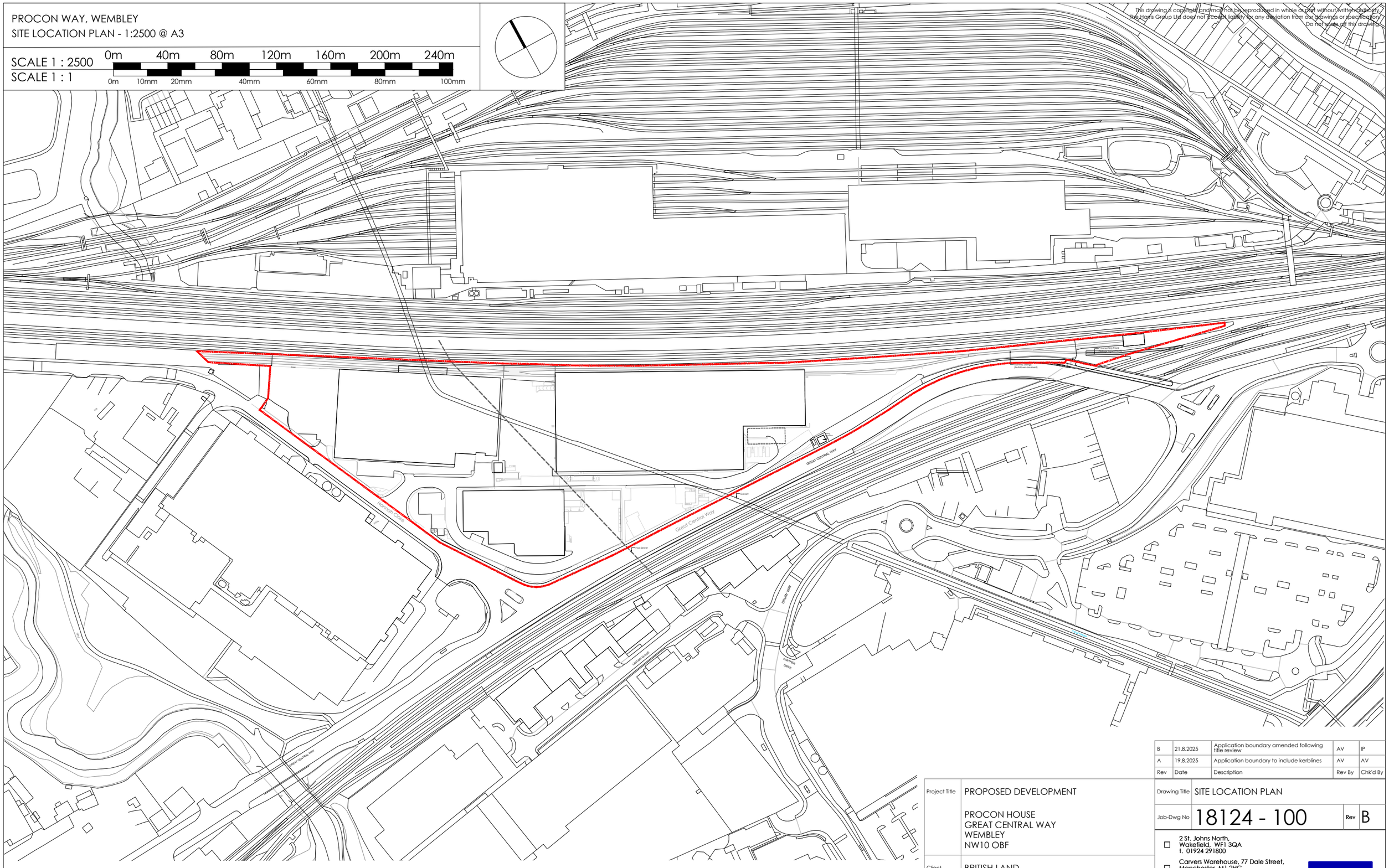
25 September 2025

PROCON WAY, WEMBLEY
SITE LOCATION PLAN - 1:2500 @ A3

SCALE 1 : 2500
SCALE 1 : 1

0m 40m 80m 120m 160m 200m 240m

0m 10mm 20mm 40mm 60mm 80mm 100mm



KEY:

- Application boundary
- Culvert Location
- Foul Sewer Location

CAD file reference CAD FILE REFERENCE

Rev	Date	Description	Rev By	Chk'd By
B	21.8.2025	Application boundary amended following title review	AV	IP
A	19.8.2025	Application boundary to include kerblines	AV	AV

Project Title	PROPOSED DEVELOPMENT PROCON HOUSE GREAT CENTRAL WAY WEMBLEY NW10 OBF
Client	BRITISH LAND
Status	PLANNING
Scale	1:2500
Drawing Size	A3
Date	1.5.2025
Drawn By	AV
Checked	AV

Drawing Title	SITE LOCATION PLAN
Job-Dwg No	18124 - 100
Rev	B

2 St. Johns North,
Wakefield, WF1 3QA
t. 01924 291800

Carvers Warehouse, 77 Dale Street,
Manchester, M1 2HG
t. 0161 2388555

The Old Rectory, 79 High Street,
Newport Pagnell, MK16 8AB
t. 01908 211577

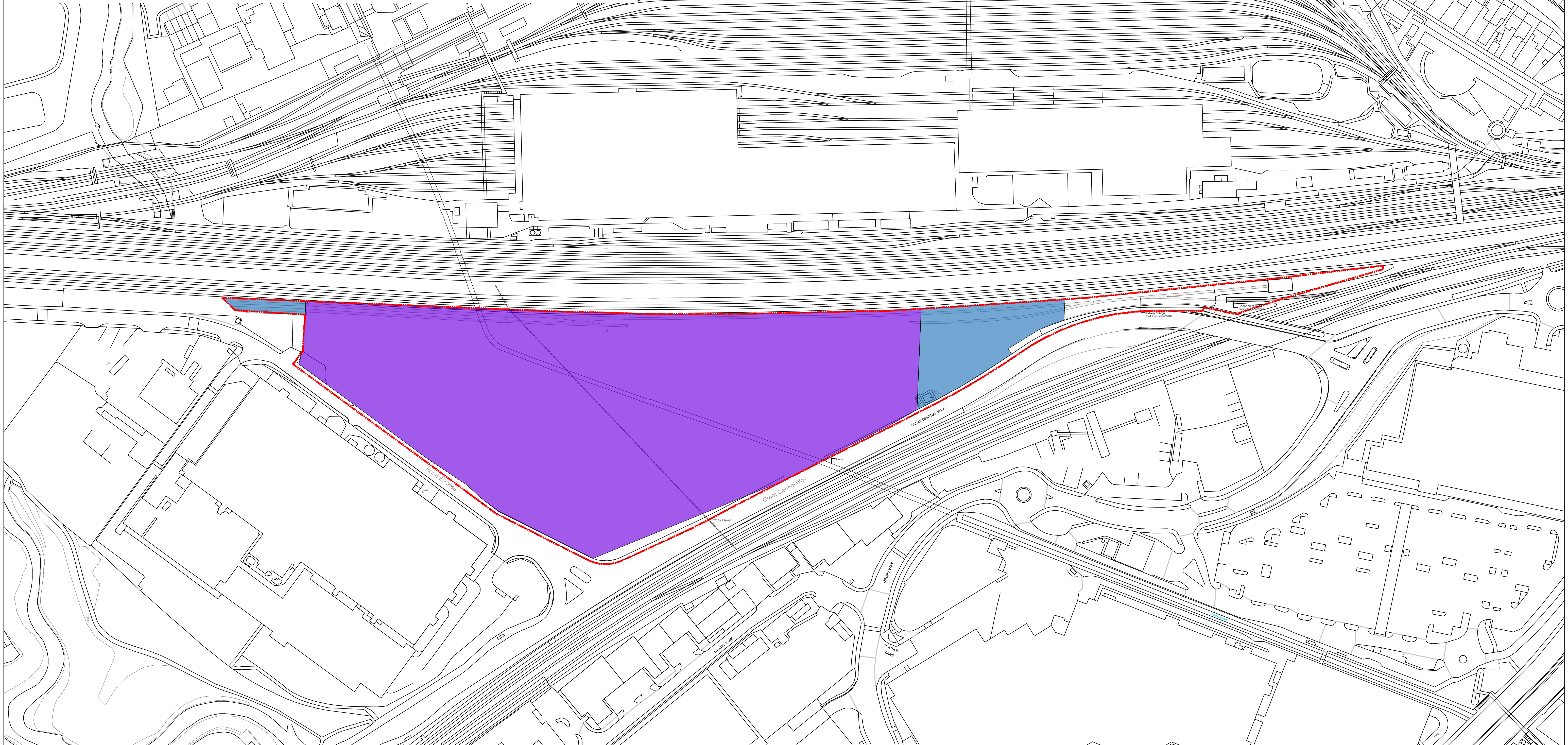
101 London Road,
Reading, RG1 5BY
t. 0118 9507700

10 Gees Court, St Christophers Place,
London, W1U 1JJ
t. 0207 4091215

THE HARRIS PARTNERSHIP
ARCHITECTS
www.harrispartnership.com

PROCON WAY, WEMBLEY
ILLUSTRATIVE MAXIMUM ENVELOPE JELLY MOULD - 1:2500 @ A3

SCALE 1 : 2500 — 0m, 40m, 80m, 120m, 160m, 200m, 240m
SCALE 1 : 1 — 0m, 10mm, 20mm, 40mm, 60mm, 80mm, 100mm



KEY:

- Application boundary
- Culvert Location
- Foul Sewer Location

KEY:

- Max 39m building height
- Max 20m building height

CAD file reference CAD FILE REFERENCE

Rev	Date	Description	Rev By	Chk'd By
A	5.9.2025	Amendments	AV	AV

Project Title	PROPOSED DEVELOPMENT PROCON HOUSE GREAT CENTRAL WAY WEMBLEY NW10 OBF
Client	BRITISH LAND
Status	FEASIBILITY
Scale	1:2500 — Drawing Size A3
Date	14.8.2025 — Drawn By AV — Checked IP

Drawing Title: ILLUSTRATIVE MAXIMUM ENVELOPE JELLY MOULD

Job-Dwg No: 18124 - 102 — Rev A

2 St. Johns North, Wakefield, WF1 3QA t. 01924 291800

Carvers Warehouse, 77 Dale Street, Manchester, M1 2HG t. 0161 2388555

The Old Rectory, 79 High Street, Newport Pagnell, MK16 8AB t. 01908 211577

101 London Road, Reading, RG1 5BY t. 0118 9507700

10 Gees Court, St Christophers Place, London, W1U 1JJ t. 0207 4091215

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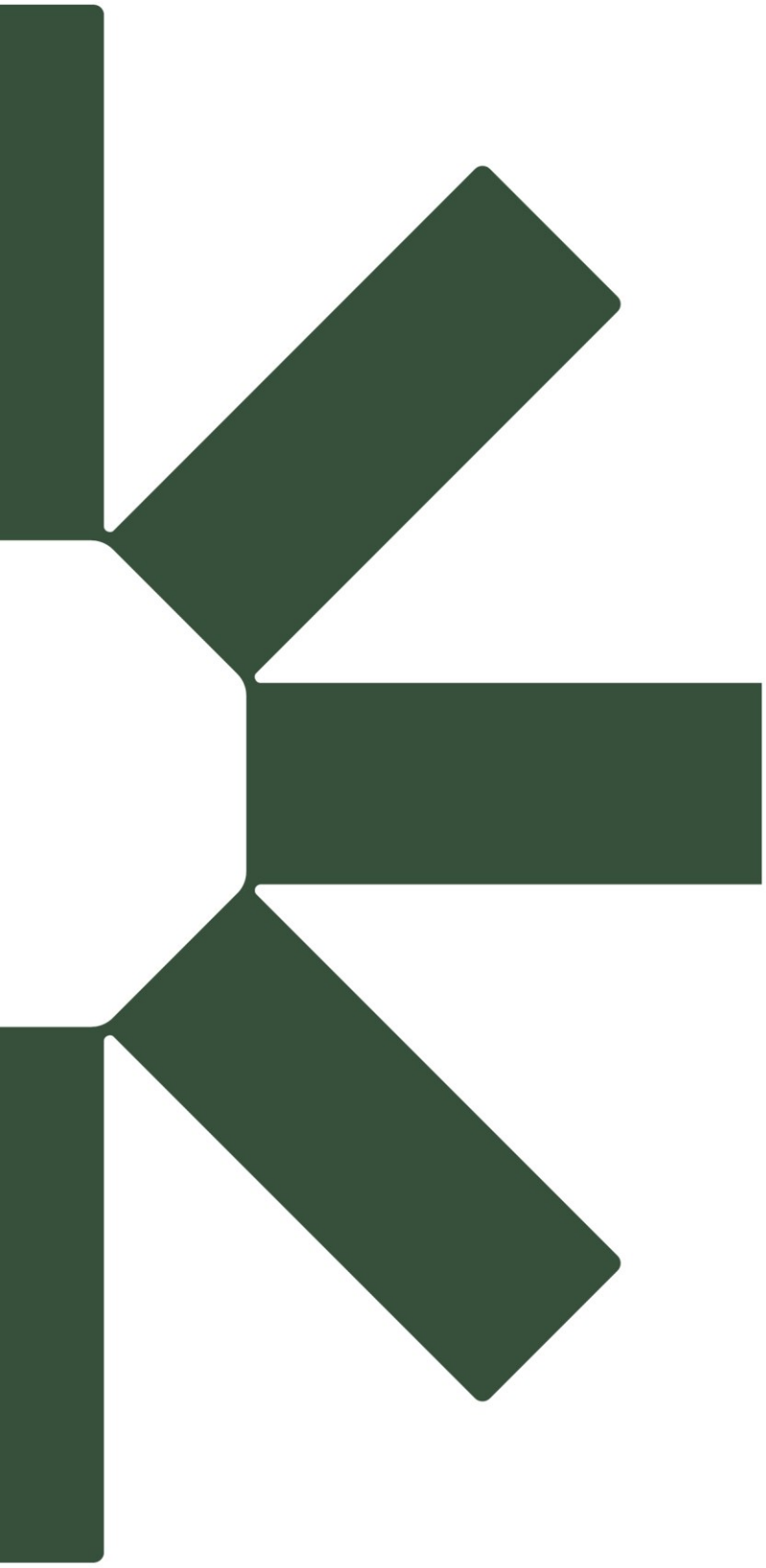

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