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Dear DP9 Ltd.,

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

**Proposal:** Screening Opinion as to whether an Environmental Impact Assessment is required for outline permission for the proposed demolition of the existing buildings and structures site and redevelopment to provide a range of industrial uses including single and multi-level logistics (up to 71,000sq.m. GEA), waste facility (up to 10,000sq.m. GEA), and data centre (32,000sq.m. GEA) with buildings rising up to 39m.

**Site:** Land at Units 2-4 Hannah Close, Wembley

I write in connection to the application for a screening opinion submitted for the above site on 07/10/2025. Reference has been made to Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations') "Requests for screening opinions of the relevant planning authority".

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

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

If you require any further assistance, please do not hesitate to contact Jordan Henderson (jordan.henderson@brent.gov.uk).

Yours sincerely,

P. Lewin

Paul Lewin

**Spatial and Transportation Planning Manager** 

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

**Description of proposed development** – Screening Opinion as to whether an Environmental Impact Assessment is required for outline permission for the proposed demolition of the existing buildings and structures site and redevelopment to provide a range of industrial uses including single and multi-level logistics (up to 71,000sq.m. GEA), waste facility (up to 10,000sq.m. GEA), and data centre (32,000sq.m. GEA) with buildings rising up to 39m.

Site - Land at Units 2-4 Hannah Close, Wembley

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

#### Introduction

SLR Consulting Ltd., on behalf of British Land Properties Ltd., have produced an initial EIA screening assessment report with the associated EIA screening opinion having been requested by the applicants agent DP9 Ltd. from London Borough of Brent (the Council) on 7<sup>th</sup> October 2025. Associated with this request, details of the site boundary, proposed development and an initial assessment of the potential impacts of the proposed development were submitted.

# The Existing Site and Surrounding Area

The site comprises 5.22ha of land within the Wembley Opportunity and Growth Area, and Strategic Industrial Location. The area is subject to significant redevelopment including at least 15,000 new homes and new commercial floorspace. The site is also located a few hundred metres west of the Neasden Stations Growth Area which is also the subject of significant redevelopment.

The site is bounded by Hannah Close in the west, from which the site is accessed, the Jubilee/Metropolitan railway line to the north (beyond which is Neasden railway sidings), and Great Central Way to the south (beyond which is the Chiltern Main Line). Beyond these boundaries the site is surrounded by industrial land, with the closest residential receptors being ~200m to the north and south along Hardie Close and Lovett Way to the south, and Cambridge Close to the north.

The site comprises three large industrial sheds, including (from largest to smallest) the LondonEnergy Waste Transfer Station (11,845.3sq.m. GIA) occupying the eastern half of the site, an Amazon warehouse (7,614sq.m. GIA) occupying the north western portion, and a Euro Car Parts warehouse and shop (6,717.5sq.m. GIA) on the south western portion. The LondonEnergy Waste Transfer Station is a safeguarded waste site under the West London Waste Plan which comprises part of the Local Development Plan. Approximately half of the site is taken up by these buildings (~2.618ha), with the remainder predominantly comprising hardstanding for roads and yard space. At the eastern most tip of the site lies a small rail depot, with railway sidings providing the site with access to the wider network. There is some incidental landscaping around the edges of the site.

Hannah Close provides access for industrial vehicles. Great Central Way is the primary road off the North Circular Road which services the industrial area and the Stadium which is

~400m to the west. In terms of public transport, the site achieves a Public Transport Accessibility Level (PTAL) of 1b-2.

The site is within relatively close proximity (~200m) to the River Brent which is a Grade I Site of Importance for Nature Conservation. The site however is not located within areas associated with fluvial flooding, having only a few areas subject to surface water flooding (Flood zone 3a). The site does not include listed buildings and nor is it within a Conservation Area. The nearest listed building is the Grade II listed The Grange, Neasden.

The National Stadium's arch is subject to several protected viewing corridors. Given its proximity to the stadium, the site is within the Great Central Way viewing corridor.

The Brent Canal Feeder is culverted beneath the site, crossing approximately mid way through the site travelling from its open point beyond Drury Way to its exit of the site to the south west of the Neasden Depot building where it rounds a corner beneath the existing Amazon warehouse. There is also a similarly positioned foul sewer which connects the sidings with Laxcon Close.

# The Size and Design of the Proposed Development

The proposal is for outline permission for the proposed demolition of the existing buildings and structures on site and redevelopment to provide a range of industrial uses including single and multi-level logistics (up to 71,000sq.m. GEA), waste facility (up to 10,000sq.m. GEA), and data centre (32,000sq.m. GEA) with buildings rising up to 39m.

As the scheme is for outline permission, details are limited. However, it is noted that all studies have been drawn up using a worst case scenario whereby the development maximises development within the scale parameters of Appendix A (up to 39 metres for most of the site, and 20 metres for a small section in the east). Some details, regarding the aspiration to provide green roofs and walls, SuDS, bird and bat boxes, and biodiverse planting, have also been noted.

# Information Provided in Support of the Request for a Screening Opinion

The request for screening opinion has been submitted with a supporting statement setting out an analysis of the likely environment effects of the proposal. The Council also has access to materials submitted in connection with a pre-application for the proposed scheme.

# **Large Scale Development within the Vicinity**

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

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

**23/0578 Olympic Way Office, 8 Fulton Road, Wembley, HA9 0NU**. Demolition of existing building and erection of building for use as a purpose-built Further Education College Campus with associated plant at roof level, provision of hard and soft landscaping and cycle parking facilities, loading bay and accessible parking bays on Rutherford Road frontage and

drop off bay on Fulton Road, subject to Deed of Agreement dated 14th March 2024 under Section 106 of Town and Country Planning Act, 1990 as amended **Granted 15/03/2024**. **Not started.** 

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

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

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

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

Full planning permission for erection of a 10-storey car park to the east of the Stadium comprising 1,816 car parking spaces of which 1,642 are for non-residential purposes, up to 82 coach parking spaces and associated infrastructure, landscaping and vehicular access. And Outline application for the demolition of existing buildings on site and the provision of up to 420,000 sqm (gross external area) of new floorspace within a series of buildings comprising:

- Retail/financial and professional services/food and drink (Use Class A1 to A4) up to 21,000 sgm;
- Commercial (Use Class B1) up to 82,000 sqm;
- Hotel (Use Class C1): up to 25,000 sqm;
- Residential (Use Class C3): up to 350,000 sqm (up to 4,000 homes) plus up to 20,000 sqm of floorspace for internal plant, refuse, cycle stores, residential lobbies, circulation and other residential ancillary space:
- Education, healthcare and community facilities (Use Class D1): up to15,000 sqm;
- Assembly and leisure (Use Class D2): 23,000 sqm;
- Student accommodation (Sui Generis): Up to 90,000 sqm.

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

Subject to a Deed of Agreement dated 23 December 2016 under Section 106 of the Town and Country Planning Act 1990, as amended. Planning Permission Granted 23<sup>rd</sup>

December 2016. A number of elements of the outline application are complete and operational whilst others are yet to begin construction. The following Reserved Matters have been approved in relation to the Outline application above, and are either under construction or have not yet started:

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

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

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

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

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

21/2130 – Olympic House, 3 and Novotel, 5 Olympic Way - Demolition of existing building at 3 Olympic Way and erection of 3 buildings of basement, ground and 9, 22 and 25 storeys (excluding rooftop plant) to provide 178 residential units (Use Class C3), new hotel accommodation comprising 260 rooms (Use Class C1) and a retail food store (Use Class E). 6-storey extension to existing hotel at 5 Olympic Way to provide 95 additional hotel rooms (Use Class C1) and amenities, extension of ground floor to create new colonnade and public realm improvements to Olympic Way. Other works associated with development include new access from North End Road, disabled car parking, cycle parking, private and communal amenity spaces, public realm works and other associated works – Granted 23/05/25 – Not started.

**24/1804 – College of Northwest London, Willesden, Dudden Hill Lane, HW10 2XD** - Hybrid planning application comprising: Full planning permission for the demolition of existing buildings and structures within 'Phase 1' and all site preparation works, and redevelopment with mixed-use buildings providing residential homes (Use Class C3), flexible commercial, retail and leisure space (Class E), workspace (Use Class E(g)), associated cycle and vehicle parking, new and altered vehicular accesses and other associated highways works, hard and soft landscaping including creation of new and upgrades to existing public open space, and all associated ancillary and engineering works; and

Outline planning permission for the demolition of all existing buildings and structures within the rest of the Site, and redevelopment with a series of new mixed-use buildings accommodating residential homes (Use Class C3), flexible commercial, retail, workspace and leisure space (Class E), community space (Use Class F), and flexible nursery/community/medical floorspace (Use Classes F/E(e)/E(f)), associated cycle and vehicle parking, new and altered vehicular accesses and other associated highways works, hard and soft landscaping including creation of new and upgrades to existing public open space, and all associated ancillary and engineering works, with all matters reserved except for means of access. – awaiting \$106.

**24/3106 – Careys, Land Opposite Careys, McArdle House, Great Central Way, Wembley** - Demolition of all buildings and structures; redevelopment of the two land parcels either side of Great Central Way to provide an industrial complex comprising five new buildings, split across five industrial units, for flexible Class E(g)(iii)/B2/B8 use, with ancillary office space, an affordable workspace building with flexible ground floor cafe use (Use Class E), parking and servicing areas, means of enclosure, cycle parking, landscaping and access for vehicles and pedestrians. Subject to a Legal Agreement made under Section 106 of the Town and Country Planning Act 1990 (as amended) **– awaiting S106.** 

# **Other Environmental Assessments**

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

# Development Plan

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

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

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

# Legislation

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

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

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

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

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

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

The proposal is for the development of a site of over 5ha in size, comprising 5.22ha of land. This exceeds the threshold under part ii. The development will also exceed part i in providing more than 1ha of non dwellinghouse (i.e. industrial) development. Therefore, consideration has been given to whether the proposed development may give rise to significant environmental effects, such that an EIA may be required.

# Likely Significant Effects

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

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

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

Council has stated the main reasons for their conclusion, referencing the relevant criteria listed in Schedule 3 as appropriate.

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

# Appendix A – Consideration of Likely Significant Effects

# **Air Quality**

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

Documentation Accompanying the Planning Application: An Air Quality Assessment (including Air Quality Positive Statement) will accompany the forthcoming application.

#### Construction

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

The receptors in close proximity to the site, combined with the new emissions, means that there is the potential for adverse effects as a result of the proposed development. Whilst there is the potential for adverse effects, with the implementation of standard best practice measures, it is not anticipated that the effects would be significant. The air quality assessment once undertaken will identify suitable measures to mitigate associated impacts. This will be achieved via the implementation of a Dust Management Plan. Taking account of these practices the effect of dust soiling and PM10 is likely to be reduced to negligible with the implementation of appropriate mitigation measures. These may include: No idling vehicles; Erect solid screens or barriers around dusty activities or the Site's boundary; Loads entering and exiting the Site are covered; Where practicable use mains or battery powered generators over fuel burning; Other dust suppression measures e.g. damping down with water; and all constructions vehicles and equipment to comply with relevant EU stage ratings.

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

# Operation

In terms of traffic generation, the existing site is fully occupied, and therefore the net change in traffic volume is to be considered. The applicant notes that a detailed model will be developed to understand this change, which will feed into the air quality assessment. The applicant notes that in recent years there has been a positive change in local air quality in the area, and that this is anticipated to continue beyond the operational phase of the development, and therefore operational emissions from transport are not anticipated to be significant.

Given the limited available information at this stage for the as yet submitted outline application, building emissions have not been considered. The proposal is for a mix of uses including industrial logistics, waste, and data centre uses. Logistics uses are most likely to result in transport emissions which has been discussed above. Waste uses are likely to result in dust and odour emissions which can be addressed via various mitigation measures

as discussed above. The data centre use may include back-up diesel generators which are for emergency use and therefore emit temporary emissions. It is anticipated that given the need to achieve air quality neutral and positive, and BREEAM 'Excellent', emissions associated with the building are not likely to be significant.

# Mitigation

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

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

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

# **Local Heritage**

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

The site does not lie within a Conservation Area or an Archaeological Priority Area. Neasden Conservation Area is ~300m at its closest to the north of the site beyond Neasden sidings. No listed buildings are within close proximity to the site. The closest scheduled monument to the Site is a 'Medieval moated site, 454 m south-west of Sudbury Golf Club House', which is approximately 3.4 km to the south west of the site. The scale of the proposed development is not such that it would have an increased zone of impact and therefore consideration of only immediate assets is required in terms of heritage. The site is close to the National Stadium Wembley which is subject to Local Plan policies seeking to protect longer distance views to it and in particular its arch. This will be discussed further in the townscape and visual impact section below.

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

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

#### **Climatic Factors**

Documentation Accompanying the Planning Application: An Energy Statement and Sustainability Statement, covering key themes including energy, transport, drainage, water, waste, air quality, ecology, noise and BREEAM, will be required.

#### Construction

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

In terms of embodied emissions, the applicant would need to comply with London Plan policy SI2 part F, and reduce whole life carbon emissions. The proposal is for outline permission for demolition of existing buildings. A retrofit first approach would need to be considered in accordance with the guidance to reduce lifetime embodied carbon emissions which otherwise may be significant. As part of this process, policy SI2 will require embodied emissions to comply with associated benchmarks, and therefore significant effects are not anticipated.

# Operation

The proposal includes up to 32,000sq.m. of datacentre floorspace. This could have a continuous electricity demand of up to ~48MWs. A West London Local Area Energy Plan (LEAP) has been produced in response to the significant energy demands required in west London. Currently, 18% of this demand is attributed to data centres, which is predicted to rise. This new consumer of energy has meant that other developments, including for housing, have stalled. Brent, however, is not located within the primary area affected by capacity constraints, which is Hillingdon, Ealing and Hounslow. Nevertheless, the borough being a location which is covered by the same Distribution Network Operator (DNO) (UKPN), where significant growth has occurred and is predicted to continue growing, is an area where this remains a concern and energy infrastructure requires upgrading to meet demand. The GLA is seeking to rectify this issue through a joint strategic approach with the associated DNOs, as set out within the West London Electricity Capacity Constraints (update 2) document. The applicant will therefore need to liaise with the GLA, UKPN, and associated energy infrastructure providers to ensure there is sufficient capacity in the local network to allow for the datacentre whilst not reducing the potential for other development to come forward within the local area. Whilst this may be significant, Brent does not fall directly within the primary affected area, and therefore impacts are not considered to be significant so as to warrant EIA.

In terms of transport energy, the initial transport assessment identifies an minor increase in trips generated of 11 two way trips per day, increasing from 2,495 to 2506. This is due to the site's current occupancy. With implementation of electric car charging ports and the electrification of transport generally, and the inclusion of sustainable travel plans and associated improvements to the local sustainable transport network, development is likely to result in a decrease in transport energy demands. Therefore no significant impacts are anticipated regarding transport on the climate.

In terms of the built form, as noted above, given the high level outline stage of the proposal, an assessment of this has not been provided. In terms of operational energy, the application would need to be net-zero carbon in accordance with London Plan policy SI2, following the be lean, clean, green and seen approach. Additionally, as a non-residential development, it

will be expected to achieve a BREEAM score of excellent. As part of the be clean assessment, and given the data-centres potential for residual heat generation, the proposal has the potential to connect and contribute towards the local district heating network which would be beneficial. As part of the be green assessment, given the potential output of solar arrays on warehouse buildings, they have the potential to be net positive (assuming energy consumption is not significant as with a datacentre), and therefore no significant operational emissions are anticipated as to warrant EIA.

# Mitigation

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

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

# **Contaminated Land**

Documentation Accompanying the Planning Application: A number of historic ground condition surveys have been relied upon, including investigations undertaken in 1978, 2009, 2021, and 2022 (Ground Conditions Assessment).

The most recent assessment included a full site inspection. This noted that the existing site is capped, with no signs of spills taking place. The site includes a material recovery site, however, processing is undertaken inside with sealed floors and drainage. Therefore no recent incidents of contamination are likely. However, the site was previously occupied as a railway siding which was poorly maintained, with past investigations noting elevated levels of contaminants (metals, Total Petroleum Hydrocarbons (TPH) and Polycyclic Aromatic Hydrocarbons (PAH)). There is no record of remediation, and therefore the soil beneath the capping is still likely contaminated. The assessment notes that in its current state the site does not present a risk to users or surrounding receptors, however, a Phase 1 Contaminated Land Assessment will be undertaken. Currently the assumption is that minimal mitigation measures will be required as part of the proposed development. Therefore no significant environmental effects are considered likely.

# Construction

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

#### Operation

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

# Mitigation

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

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

# Daylight, Sunlight and Overshadowing

Documentation Accompanying the Planning Application: A high level assessment has been commissioned for the purposes of the screening request. Given the site is not within close proximity to any sensitive receptors, a full assessment will not be required at planning application stage.

#### Construction

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

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

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

# Operation

The operation of the proposed development will introduce buildings of up to 39m high. The site however benefits from there being no sensitive receptors within close proximity, with the the north in particular being a swathe of railway sidings. All buildings nearby which could be impacted are industrial in use, and therefore do not require the same level of daylight as the more sensitive residential receptors. Therefore the limited impacts of the proposed development are not considered to be significant.

#### Mitigation

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

# Biodiversity (including flora and fauna)

Documentation Accompanying the Planning Application: A preliminary Ecological Assessment has been provided including a site assessment, Potential Roost Assessment, and Ground Level tree Assessment.

The site contains no areas of statutory nature conservation and there are no such sites within the immediate vicinity. There are no SPA, SAC or Ramsar designations within 5km of the site. There is a single SSSI within 5km of the Site, namely Brent Reservoir SSSI, approximately 1.5 km north-east of the site. Masons Field (Fryent Country Park) Local Nature Reserve (LNR) is approximately 1 km to the north of the Site and Brent Reservoir /

Welsh Harp LNR is approximately 1.5 km to the north-east of the Site. Fryent Country Park LNR consists of meadows, ponds, lakes, hedges and woodland. Brent Reservoir / Welsh Harp LNR consists of open water, marshes, trees and grassland and the reservoir includes associated waterfowl. Last assessed on 20<sup>th</sup> March 2019, Brent Reservoir was identified as being in favourable condition, having a good breeding bird assemblage on the open water and fen habitats across the site. The site falls within the Impact Risk Zone for this SSI for a number of uses, however the proposal does not fall within these and therefore significant impacts are not considered to be likely.

The site is predominantly hardstanding, with limited areas of soft landscaping limited to incidental planting comprising individual trees, shrubs, mixed scrub and modified grassland. The site is within relatively close proximity to Brent River Park Grade I SINC. This proposal will to some extent benefit the SINC, but this is not considered to be significant. The railway corridors to the north and south are identified as wildlife corridors due to their potential to allow for the movement of flora and fauna, although this is likely limited given the frequency of trains. The Brent canal feeder, which for much of its length is an identified Site of Importance for Nature Conservation, runs beneath the site in a culvert, Japanese knotweed has been identified in the southeastern corner of the site, the removal of which will need to be managed and subjected to an Invasive Non-Native Species Management Plan. Given the site's 24hr operation and lighting, it is considered to have negligible suitability for badgers, bats (foraging and commuting), great crested newts, reptiles, and invertebrates. The trees provide moderate suitability for the nesting of common urban bird species, although these are unlikely to be significant. All buildings also have negligible suitability for bats, as do the identified 60 trees within the site. Some trees outside the sides boundary to the east and west have some suitability for bats. Suitable mitigation measures and supportive features for bats and other suitable fauna will be provided within any forthcoming planning application. The proposal is therefore unlikely to result in any significant environmental effects in respect of biodiversity.

The proposal will be required to achieve a biodiversity net gain of 10% in accordance with national legislation. The existing habitats given their location on the fringes of the site are likely to be retained and enhanced with additional habitat. Whilst this will be beneficial, it is unlikely to be significant.

# Construction

A range of standard mitigation measures may be required to reduce potential adverse impacts on biodiversity, such as timing of demolition/ construction activities, relocation of bats and controls on lighting. It is not considered that the construction of the proposed development will have a significant effect on the integrity of statutory or non-statutory nature conservation designations or protected species and the potential for conservation requirements and objectives would not be diminished.

# Operation

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

# Mitigation

Suitable conditions should be in place to ensure potential adverse impacts on any existing protected species are minimised prior to and during works on site, as well as incorporation of

suitable features to encourage bio-diversity resources as part of the development. The potential for contamination risk should be dealt with through the implementation of appropriate mitigation in the demolition and construction phase (to be secured by standard planning condition). Mitigation measures and compliance with regulatory waste disposal controls and hazardous material management would be set out in a CEMP.

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

# Flood Risk

Documentation Accompanying the Planning Application: A detailed Flood Risk Assessment and Drainage Strategy will be provided as part of a detailed planning application.

The site is located within close proximity to the River Brent, however, is completely within Flood Zone 1 for fluvial flooding given the level of the site relative to the river channel and the surrounding railway land. Flood risk from ground water is also low. The site has some patches of Flood Zone 3a for surface water given the level of hardstanding, however, this is limited and with suitable drainage measures such as the use of SuDS, these are likely to be suitably mitigated, with the statement noting that run-off rates will be equivalent to greenfield rates.

#### Construction

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

# Operation

The only flood risk on site is for surface water. Run-off rates are to be equivalent to greenfield rates. Flood risk is therefore low and will be reduced with limited risk during operation and therefore impacts are not considered to be significant to warrant EIA.

#### Mitigation

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

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

#### **Human Health**

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

# Land (land take)

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

#### **Material Assets**

The construction and operation of the proposed development will utilise material assets, but given the scale of the development this is not considered to be substantial. As such, significant effects are not considered to be likely. The applicant will need use circular economy principles and follow the waste hierarchy. Other measures to reduce waste are also to be taken including during operation. No discipline specific mitigation has been relied upon for the EIA Screening Opinion.

# Major accidents and/or disasters

Documentation Accompanying the Planning Application: A Fire Statement will be required.

A fire demonstrating compliance with London Plan policy D12 on fire safety will need to be provided.

It is considered that the risk from major accidents and/or disasters (both of existing and new receptors) has been appropriately considered within the relevant topic sections (e.g. climate change, flood risk) and as such reference should be made to these sections as required. The existing and proposed uses are not considered to present a high risk in terms of major accidents or disasters, and neither are there any such uses within close proximity to the site. Significant impacts are therefore not considered to be likely to warrant EIA.

#### **Noise and Vibration**

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

The existing roads and railways bordering the site currently are the dominant sources of noise in the area. Moderate levels of noise from the existing and adjacent uses are also likely, and elevated levels of noise and activity likely during major sporting / cultural events. The site occupies a Strategic Industrial Location where 24hr operation is not to be compromised, and therefore some day round noise is expected.

# Construction

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

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

# Operation

In terms of noise from traffic, in order for construction traffic to have any noticeable impact upon noise, traffic flows on surrounding roads would need to double. The Transport Assessment identifies during operation that transport flows and trips will remain broadly the same, with a slight increase in the worst case scenario. As such, there is not considered to be any significant effects from traffic noise.

The screening assessment identifies a range of potential operational sources of noise associated with the proposed uses, and associated mitigation measures. Given the existing use of the site and surrounding context, the proposal is not anticipated to result in likely significant effects related to noise.

No significant effects are therefore anticipated.

# Mitigation

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

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

# **Socio-Economic (including population)**

Documentation Accompanying the Planning Application: An initial assessment of socio-economics has been undertaken.

#### Construction

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

#### Operation

The existing site comprises ~26,000sq.m. of industrial floorspace. The proposal is for up to 113,000sq.m. split across industrial and logistics, a data centre, and a waste facility. This is likely to result in an increase in jobs on site when considering typical employment densities. The applicant's initial assessment identifies in the worst case scenario, were all uses, especially the data centre (up to 32,000sq.m.), to provide lower levels of employment, the proposal could result in a loss of jobs on site. In the context of the local area, this would result in a reduction in local jobs by up to 0.9% which is not significant and would not result in likely significant effects to warrant EIA.

# Mitigation

Financial contributions through CIL will be sought to mitigate the effects of increased users. The Council will also seek to secure a number of jobs, including apprenticeships, for both the construction and operation phases, for Brent residents as part of the Brent Works scheme and in accordance with the Councils Planning Obligations SPD.

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

# Soil (organic matter, erosion, compaction, sealing)

# Construction

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

# Operation

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

#### Mitigation

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

#### **Telecommunications**

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

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

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

# **Townscape and Visual Impact**

Documentation Accompanying the Planning Application: A Heritage and Townscape assessment has been commissioned. The National Stadium is subject to local policy for protection of views to it from various locations across the borough.

# Construction

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

#### Operation

A small part of the site along Great Central Way where it junctions with Hannah Close lies within the Great Central Way protected viewing corridor. The majority of this is within the view setting, with only a very small part of the site within the view focus. Given the limited extent of the site within the corridor, it is considered unlikely that associated impacts on the

protected view will be significant, with any potential impacts likely being easily mitigated through the sympathetic placement of build form massing. The proposal is also within the background setting of a number of views of the stadium from its west, although given the existing and extant proposed built forms between the proposed site and the stadium, the proposal is unlikely to have any potential impacts upon the setting of the arch.

The applicant has done an initial Zone of Theoretical Visibility (ZTV) assessment on Vu.City. This notes that under a maximum built form scenario, there would be potential visibility from St. David's Playing Fields, the River Brent, passengers along the adjacent railway lines, and motorists along Great Central Way and Hannah Close. The site is located within an existing industrial area where big box warehouses are typical and in-keeping with the existing character. This character exists to the north, south, east, and west. The site is relatively open to the north, east and south. Whilst the proposed scale (up to 39m) and massing of the proposed development is likely to have impact on the surrounding area, given the surrounding built form (including reference to the Wembley Growth Area) and the distances between the site and other non-industrial uses, the proposed impacts are not likely to be considered significant so as to warrant EIA.

# Mitigation

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

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

# **Traffic and Transport**

Documentation Accompanying the Planning Application: A Transport Assessment has been commissioned, the initial findings of which inform the screening report. A Travel Plan will also be required.

# Construction

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

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

# Operation

The majority of vehicles accessing the site will arrive via the North Circular Road, onto Great Central Way, and finally Hannah Close. These roads have therefore been assessed. The initial assessment identifies a minor increase to and from the site by 11 trips, which is a marginal increase in the worse case scenario assessment. The composition of vehicle types however is skewed reflective of the more intensive use of the site, with more vehicles comprising LGVs and HGVs, with a 27% and 47% increase respectively. An assessment of trip generation as percentage traffic flows on the key roads is undertaken, identifying marginal trip increases on all but Hannah Close, which incurs a 5.4% increase, which is not significant, and is expected given it is the key access road for the site. The North Circular

(north and south) and Great Central Way incur a 0.1% and 1.4% increase respectively, which is insignificant. Therefore, no significant effects are considered likely in light of this initial worse case scenario assessment.

# Mitigation

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

A Travel Plan will be required to ensure all is done to promote sustainable transport modes are used.

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

#### Waste

Documentation Accompanying the Planning Application: A Waste Planning Statement/Assessment will be submitted.

#### Construction

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

#### Operation

Commercial waste is covered under the same legislation as construction waste, above. The submitted Operational Waste Management Plan will need to follow the waste hierarchy. The proposal includes up to 10,000sq.m. for a waste facility. This is to replace the existing waste facility. The proposal will therefore not introduce a new waste facility. The existing waste facility is ~11,845sq.m. GIA, and therefore the proposal will result in a reduction of waste handling floorspace. The applicant would need to demonstrate that the existing waste capacity is retained or is accommodated elsewhere. The proposal will therefore not result in a loss in waste handling capacity. The new waste facility will meet modern standards, and therefore is likely to better contain the associated impacts of the use. Any forthcoming planning permission will ensure suitable reprovision of a facility to replace an agreed amount of waste processing capacity on site consistent with policies addressing the safeguarding of waste facilities will be delivered.

# Mitigation

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

# Water Quality (hydro morphological changes, quantity and quality)

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

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

# Construction

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

# Operation

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

# Mitigation

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

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

#### Wind

Documentation Accompanying the Planning Application: A Wind Assessment has been commissioned and will accompany the forthcoming application.

#### Construction

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

# Operation

The operation of the proposed development will introduce new buildings onto the site of between 20 and 39m, which is greater than the existing 10-16m high buildings. Therefore, there may be adverse effects on the existing wind conditions, although the proposed scale of development is insignificant when compared with other development in the area. The scale is such that it is not affected by wind streams which are present at higher altitudes, where wind speed typically increases with altitude. The development is also broken into a number of units, providing breaks in the massing to reduce impacts of channelling. As such it is not anticipated that the environmental effects will be of such significance to warrant EIA.

#### **Cumulative Effects**

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

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

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

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

# **Demolition/Construction**

The Environmental Statement (ES) submitted with 21/2989 (Euro House) notes possible major adverse cumulative effects in relation to noise and vibration, due to construction noise.

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

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

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

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

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

# Operation

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

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

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

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

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

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