

Dear Carney Sweeney,

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

Proposal: Screening Opinion as to whether an Environmental Impact Assessment is required for the proposed retention and expansion of the existing hotel to provide a mixed use development ranging between 15 and 26 storeys across 3 new elements and comprising a total of 422 hotel bedrooms (Class C1), 337 co-living units (Sui Generis), 167 build-to-rent units (Class C3), and 80 care units (Class C2).

Site: Holiday Inn, Empire Way, Wembley, HA9 8DS

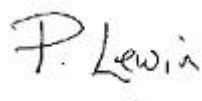
I write in connection to the application for a screening opinion submitted for the above site on 26/08/2025. Reference has been made to Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations') "Requests for screening opinions of the relevant planning authority".

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

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

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

Yours sincerely,



Paul Lewin
Spatial and Transportation Planning Manager

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

Description of proposed development – Screening Opinion as to whether an Environmental Impact Assessment is required for the proposed retention and expansion of the existing hotel to provide a mixed use development ranging between 15 and 26 storeys across 3 new elements and comprising a total of 422 hotel bedrooms (Class C1), 337 co-living units (Sui Generis), 167 build-to-rent units (Class C3), and 80 care units (Class C2).

Site – Holiday Inn, Empire Way, Wembley, HA9 8DS

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

Carney Sweeney, on behalf of Splendid Hospitality Group, requested a screening opinion from London Borough of Brent (the Council) on 26th August 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 0.718ha of land within the Wembley Opportunity, Growth Area, and Tall Building Zone. The area is subject to significant redevelopment including at least 15,000 new homes and new commercial floorspace.

The site is currently occupied by a Holiday Inn hotel. This comprises a 1-2 storey podium with a 12-storey block situated on an east-west axis. Level parking is provided to the building's west where it fronts Wembley Hill Road, off which it is accessed via Royal Route to the site's north. On the other side of Wembley Hill Road is the ~10 storey residential development Signia Court. To the site's east is a recently built Premier Inn of ~13 storeys, that fronts onto the pedestrian thoroughfare Wembley Park Boulevard. To the site's south is the recently developed 10-21 storey Williamson Heights mixed-use residential-led development, and an older ~16 storey Ibis hotel.

The site predominantly comprises hardstanding and built form, including limited soft landscaping, with some tree planting along its border with Wembley Hill Road and some grass verges within the level car park. The site is designated as an Air Quality Management Area and is within a Brent Air Quality Focus Area. The site does not include listed buildings and nor is it within a Conservation Area. The nearest listed building is the Grade II listed Wembley Arena. Part of the northern eastern portion of the site located along Royal Route is located within the Tokyngton Chapel Site of Archaeological Importance.

The National Stadium's arch is subject to several protected viewing corridors. Given its proximity to the stadium, the site is within a number of these corridors, including within the views 'focus' and 'setting', and the stadium's foreground and background. The primary corridors within which the site is located within the views' focused foreground are the views from Elmwood Park and Horsenden Hill.

The Size and Design of the Proposed Development

The proposal is for the retention and expansion of the existing hotel to provide a mixed use development ranging between 15 and 26 storeys across 3 new elements. In total the site will comprise 422 hotel bedrooms (Class C1), 337 co-living units (Sui Generis), 167 build-to-rent units (Class C3), and 80 care units (Class C2).

Two of the new blocks will stand on the existing podium and straddle the existing 12 storey block on a north-south axis. Some of the existing built form will be demolished to achieve this where the blocks intersect. These two blocks increase in scale from east (15 storeys) to west (18 storeys). The largest block (12-26 storeys) will be placed on the existing level car parking and will be contiguous with the existing built form. The 26 storey block will comprise 80 care units on levels 1-5 with 167 build-to-rent homes above. The middle block will deliver an additional 86 hotel bedrooms, combining with the existing 336 bedrooms to provide a total of 422 hotel bedrooms. The smallest block will provide 337 co-living units.

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

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

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

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

floorspace (Classes (E/F2). Basement accommodation is proposed for plant and cycle storage. **Granted 11/12/2024 subject to completion of S106 legal agreement.**

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

21/2517 – Land to the east of Rutherford Way (plot NE02) and phase 1B of the northern park, Wembley - Reserved matters application in relation to hybrid planning permission 15/5550 (as amended by planning permissions 17/0328, 18/2214 and 20/2844) for the access, appearance, landscaping, layout and scale for Plot NE02 comprising the construction of two buildings, ranging from 10 to 27 storeys in height, providing residential units with private communal residential landscaped gardens and terraces, and commercial floorspace as well as associated plant, cycle storage, refuse provision, other residential ancillary space and associated infrastructure and public realm including new pedestrianised estate roads, works to Rutherford Way including provision of parking and loading bays and Phase 1B of a new public park comprising the installation of hard and soft landscaping, informal play space, lighting and other associated works. – **Granted 22/10/2021 – Under construction but soon to complete.**

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

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

21/2989 – Euro House, Fulton Road - Demolition and redevelopment of the site to provide erection of five buildings ranging from ground plus 14 to 23 storeys; comprising residential units, retail floorspace and workspace / storage floorspace, private and communal amenity space, car parking, cycle parking, ancillary space, mechanical plant, landscaping and other associated works (phased development), subject to a deed of agreement dated 24/03/2022

under Section 106 of the Town and Country Planning Act 1990. APPLICATION SUBJECT TO AN ENVIRONMENTAL STATEMENT. **Granted – 25/03/2022 – One block completed, the remainder under-construction.**

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

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

Other Environmental Assessments

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

Development Plan

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

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

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

Legislation

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

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

- a) any part of that development is to be carried out in a sensitive area; or

b) any applicable threshold or criterion in the corresponding part of Column 2 of that table is respectively exceeded or met in relation to that development.

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

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

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

The proposal is for a mixed use development. Most notably as regards the above, this includes 167 new conventional dwellings, which exceeds the threshold set out under part ii. The scheme also includes 336 co-living units, 80 care units, and 86 new hotel rooms. It may therefore require EIA and as such the likely significant effects have been considered below.

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 decides whether Schedule 2 development is EIA development, they must consider the selection criteria set out in Schedule 3 as are relevant to the development.

The Council has considered 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, regarding the factors specified in regulation 4(2) and taking into account the types and characteristics of the potential impact listed in paragraph 3.

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

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

Appendix A – Consideration of Likely Significant Effects

Air Quality

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

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

Documentation Accompanying the Planning Application: *An Air Quality Assessment (including Air Quality Positive Statement) will be undertaken to support any 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 near the site, combined with the new emissions, means that there is the potential for adverse effects as a result of the construction proposed development.

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

As such, whilst there is the potential for adverse effects because 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

Air quality emissions during operation will be from new traffic generation and heating systems. As the development is required to achieve air quality positive, it is anticipated that heat and hot water are to be provided via an all-electric system, and therefore such

emissions will be absent on-site. In terms of car parking, the existing site has a basement car park with capacity for 225 cars, and a level car park for 25 spaces, totalling 250 spaces. The proposed scheme will redevelop the level parking, and use half of the basement for ancillary uses, resulting in a total of 101 parking spaces proposed, resulting in a significant reduction of 149 spaces. The more intensive use of the site has the potential to generate an increased number of trips using taxis, as well as increased servicing and coach trips. This has been set out in the accompanying Transport Scoping Note. Whilst this may be an increase beyond the existing situation, considering the reduced parking provision, the ability to mitigate impacts through various documents including a Travel Plan and requirement to achieve air quality positive, impacts to air quality are not anticipated to be significant.

Mitigation

Air Quality Positive development will need to be achieved. During the construction phase a Dust Management Plan will be implemented which implements suitable measures to reduce the impact of dust and emissions. This can be secured via planning conditions.

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

The supporting statement advises that the proposal is not anticipated to have any negative effect on Air Quality. Suitable conditions associated with the Transport Statement and measures to reduce reliance on the private car, for example through provision of sufficient cycle parking and through an effective travel plan will assist in reducing operational emissions and therefore significant effects are not considered likely.

Local Heritage

Documentation Accompanying the Planning Application: *A Heritage, Townscape and Visual Impact Assessment, and an appropriate archaeological assessment would be required.*

The site includes the Tokyngton Chapel Site of Archaeological Importance within its northeastern section. The supporting information notes that best practice working methods will be followed to ensure that, should any below ground non-designated heritage assets be discovered, appropriate mitigation fieldwork will ensure adverse impacts are avoided in accordance with GLAAS procedures. Whilst some below ground activity will be taking place, the proposal is for most of the existing structure to be retained, and therefore significant below ground disturbance is not considered to be likely. Therefore, significant effects are not considered to be likely. To ensure this is the case, an appropriate archaeological assessment would be required as part of any forthcoming planning application.

The site does not lie within or near a Conservation Area. The closest listed buildings are equidistant at around 300 metres away to the north (Wembley Arena Grade II) and south (St Joseph's Catholic Church) are Grade II listed. Both are separated from the site by dense development and tall buildings. The closest scheduled monument to the Site is a 'Medieval moated site, 454 m south-west of Sudbury Golf Club House', which is approximately 3km to the southwest of the site. Whilst the scale of the proposed development is a significant increase beyond existing, it is set within an existing context of similarly tall buildings, and it therefore would not have an increased zone of impact and therefore consideration of only immediate assets is required in terms of heritage. It is also close to the National Stadium Wembley which is subject to Local Plan policies seeking to protect longer distance views to it

and in particular its arch. This will be discussed further in the townscape and visual impact section below.

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

Climatic Factors

Documentation Accompanying the Planning Application: A sustainability statement, covering key themes including energy, transport, drainage, water, waste, air quality, ecology, noise and BREEAM, will be required. Energy will need to be addressed in detail via an Energy Statement. A Transport Statement, Travel Plan, and Delivery and Servicing Plan will also 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. The proposal also seeks to retain most of the existing building which will reduce the additional embodied carbon of the proposed development which is beneficial.

Operation

The proposal given its intensified use of the site will result in an increase in energy demands, however, it is anticipated that given air quality requirements and the need for major developments to be net zero carbon, that heating and hot water will be electricity based likely using heat pumps, and the building will achieve high energy efficiency in accordance with policy requirements. The rooftops will also likely include some elements of bio-solar enabling on-site energy generation to contribute towards the site's green energy use. Emissions from traffic also have the potential to increase, however, the proposal will result in a decrease in on-site parking of 149 spaces. A Travel Plan will help ensure most trips are undertaken via sustainable modes of transport, which given the site's sustainable location in terms of access to public transport is likely to occur. A delivery and servicing plan will also be required to reduce the number of trips generated from these sources. Taking this into account the level of net traffic generation resulting from this development is likely to be small and in terms of carbon generation/ greenhouse gases relatively small and therefore significant effects are not considered to be likely.

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 be required 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: *no discipline specific information has been provided.*

The proposal largely retains the existing building and therefore below ground activity will be limited, limiting the potential for revealing and creating newly contaminated land.

Construction

During construction it is considered there is 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 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.

Considering the above, the contamination issues are not so significant as to warrant an EIA.

Daylight, Sunlight and Overshadowing

Documentation Accompanying the Planning Application: *The applicant has stated that a Daylight and Sunlight Assessment will be submitted with the full application.*

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 proposal will introduce buildings of up to 26 storeys in height. This is greater than the existing building which is 12 storeys. It also includes a different orientation to the newly proposed elements. The impacts of the proposal will therefore be greater than existing and require detailed consideration via an appropriate Daylight and Sunlight assessment, as is proposed. The development is however sited within a context where tall buildings are common, and policy supports their provision. The proposed assessment will be sufficient to allow consideration of environmental impacts upon existing and proposed receptors. Whilst there may be adverse impacts on adjoining receptors, these impacts are not so significant to warrant EIA.

Mitigation

Taking account of the daylight and sunlight assessment will allow consideration of the merits of reducing building heights, changing mass, or increasing separation to reduce the prospect of unacceptable impacts on receptors.

Overall, 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 tree survey has been undertaken. A Biodiversity Net Gain report will also be required.*

The site predominately includes built form and hard standing in the form of a level car park. The substrate on most of the site is shallow given the presence of a basement car park. Much of the site therefore has limited potential for flora and associated biodiversity. The site's border with Wembley Hill Road includes some trees, the majority of which will be retained. A Biodiversity Net Gain of at least 10% will also be required, which is beneficial, but not significant in this instance. Given the lack of biodiversity on site, potential for loss is also limited. The proposal could incorporate measures which would improve biodiversity, including factors outside the consideration of BNG, including swift bricks, bat and bird boxes, although given the dense nature of the development proposed, these are unlikely to be significant.

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

Construction

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

Operation

As the existing land predominantly comprises buildings 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 although as noted above this is unlikely to be significant.

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 biodiversity 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 accompany any full application.*

The site is in Flood Zone 1 for fluvial. According to EA modelling a small part within its curtilage to the northeast and on the likely lowest point of the site appears to be surface water Flood Zone 3 of a depth of up to 60cm. This is possibly related to topological data and its interpretation by the modelling, assuming pooling of water during heavy rainfall from adjacent areas. This modelled flooding may not occur due to drainage features which remove the water and needs further investigation. Risk in relation to extent of area, water flow and depth is in any case likely to be low for people. Given the scale of development the applicant will submit a detailed Flood Risk Assessment.

Construction

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

Operation

Whilst the site has low risk of flooding, policy expectations are that wherever possible development is not placed within areas at risk of flood and that safe access and egress to and from the site can be assured at times of flood. In respect of surface water control a comprehensive approach will be required for the site, greenfield run-off rates are required to be achieved, incorporating SuDS, this may also remove the existing surface water flooding (if it does exist) and therefore the operation of the development will have a lower impact of flooding on and offsite than existing. 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

Further modelling will be required to ascertain the extent of surface water flooding, its depth and risk to people or property. A comprehensive approach will be required for the site, greenfield run-off rates are required to be achieved, incorporating SuDS, this may also

remove the existing surface water flooding (if it does exist) and therefore the operation of the development will have a lower impact of flooding on and offsite than existing.

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 new floorspace. 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 also be required to submit a Circular Economy Statement. 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 statement will be required in accordance with London Plan policy D12 on fire safety. This will address any potential accidents related to the risk of fire.

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

Noise and Vibration

Documentation Accompanying the Planning Application: *No discipline specific documentation has been provided.*

The site occupies an area which includes commercial activity, including the existing on-site hotel. It is also sited on the relatively busy Wembley Hill Road and close to Wembley Stadium. As such, the existing environment already includes activity which will generate noise.

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 because of construction activities.

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

Operation

Parking is significantly reduced below existing. There will also be deliveries as well as waste removal, but in an urban context the impacts will be limited. As such, there is not considered to be any significant effects from traffic noise. The building fabric and ventilation methods will be designed to be sufficiently robust to address the noise generated from adjacent land uses, including activities at the National Stadium.

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. The building fabric and ventilation methods will be designed to be sufficiently robust to address the noise generated from adjacent land uses, including activities at the National Stadium.

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: *No discipline specific documentation has been provided.*

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 proposal is for a mixed-use scheme include hotel, care, co-living, and conventional residential. The hotel and care uses will generate new employment. The new hotel bedspaces will also allow visitors to visit the area a contribute to the local economy. Whilst this is beneficial, it is unlikely to be significant.

Mitigation

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

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

Soil (organic matter, erosion, compaction, sealing)

Construction

There is the potential for some loss of organic matter, erosion, compaction and sealing during the demolition/construction phase; however, given the scale of the development and the length of the demolition/construction phase, effects are not considered to be significant. This is particularly so given the proposal is for the retention of the existing building and below ground activity/demolition works will be more limited.

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: No discipline specific documentation has been provided.

Whilst the development is of a significant scale up to 26 storeys, the massing of the towers is broken up allowing for transmissions to permeate the site. 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 similar scale. This found that interference to the reception of TV or radio services was unlikely. As such, based on information provided with other sites in the vicinity the impact is not to be significant.

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

Townscape and Visual Impact

Documentation Accompanying the Planning Application: *A Townscape and Visual Impact Assessment will be required. 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 for example using hoarding, to provide a physical/visual barrier to the works.

Operation

As noted above, the site is within some protected viewing corridors of Wembley Stadium. Notably, it is within the foreground focus views from Elmwood Park and Horsenden Hill. Some initial view assessments have been undertaken from nearby roads, including Wembley Hill Road, Linden Avenue and Dagmar Avenue. The views from Dagmar Avenue are similarly aligned with the protected view from Elmwood Park. The building is however off

to the south of the view, and therefore whilst it may to some extent obscure the stadium, this will be limited, and it won't obscure views of the arch. The impacts on the view from Horsenden Hill have not been assessed in detail and therefore it is unclear of the impact, albeit as the view of the arch is not of regional importance (as identified in the London Plan), impacts in any case are unlikely to be sufficient to be regarded as significant in the context of an assessment against the threshold required for EIA.

Mitigation

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

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

Traffic and Transport

Documentation Accompanying the Planning Application: *A Transport Statement, including Healthy Street Assessment, Travel Plan, and Delivery and Servicing Plan will need to be submitted with the planning application.* Currently all that has been provided is a Transport Scoping Note.

Construction

There will be an increase in the number of vehicles accessing the site during the construction phase, however, the anticipated numbers are not considered to be significant. 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

In terms of car parking, the existing site has a basement car park with capacity for 225 cars, and a level car park for 25 spaces, totalling 250 existing spaces. The proposed scheme will redevelop the level parking, and appropriate half of the basement for ancillary uses, resulting in a total of 101 parking spaces proposed, resulting in a significant reduction of 149 spaces. The more intensive use of the site has the potential to generate an increased number of trips using taxis, as well as increased deliveries, servicing and coach trips. This has been set out in the accompanying Transport Scoping Note. Whilst this may be an increase beyond the existing situation, considering the reduced parking provision and the ability to mitigate impacts through various documents including a Travel Plan, impacts to the local road network are not anticipated to be significant.

Mitigation

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

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

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

Waste

Documentation Accompanying the Planning Application: *No discipline specific material has been submitted.*

Construction

The site will generate waste, principally building materials during the demolition and construction stages. Waste from demolition will be limited given the existing building will be largely retained. 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. No significant effects are therefore anticipated.

Operation

The proposal includes several uses, including residential uses, a care home, and a hotel. These uses will result in the production of normal domestic waste, normal in quantity and type. The care home use may also produce a small quantity of medical waste, but this will not be significant. Significant impacts are therefore not considered to be likely.

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.*

Construction

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

Operation

There is the potential the operation of the proposed development to affect the foul and surface water capacity/ quantity due to an increased demand. Whilst there may be an

increase in demand, given the scale of the development, it is not considered to lead to significant effects. There is the potential for pollutants originating from motor vehicles to enter the surface water and ground water systems. Such risk can be mitigated through the inclusion of pollution control measures in surface water drainage systems, which can be secured by condition. It is not considered, given the scale of the development and the implementation of SuDS (refer to 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 through a planning condition.

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

Wind

Documentation Accompanying the Planning Application: *A wind Impact Assessment should be provided at full application stage given the scale of the proposed development.*

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 proposal will introduce buildings of up to 26 storeys. This will have an impact on the passage of wind, potentially leading to tunnelling and downdrafts. The two smaller proposed blocks will be on the existing podium, which will reduce downdrafts into the pedestrian realm. The 26 storey element will not benefit from this, and therefore mitigation measures to dissipate wind channelling effects will be required, as proposed. Wind speeds increase with altitude meaning this block has the greatest potential to influence wind conditions. Whilst the blocks are broken up allowing for wind to permeate the development, this potential remains. This will require the production of a wind impact assessment, which will ensure dangerous wind conditions are not created, and pedestrian thermal comfort is upheld. Whilst the development does have the potential to impact local wind conditions, this is unlikely to be significant, and any impacts can be dealt with at application stage through rigorous modelling and design mitigation. Therefore, significant impacts are not considered to be likely.

Cumulative Effects

The 2017 EIA Regulations requires the consideration of cumulative effects through interactions being the combined effects of individual effects arising because 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 several 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 these assessments related to the individual impacts and the associated cumulative impacts of the proposals. Most 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 the wider Wembley Masterplan area, will likely be subject to additional applications soon. The proposed scheme is within their immediate proximity. They therefore provide a basis for determining what kind of development can result in likely significant impacts 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 several 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 note 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 adverse impact in relation to climate change (greenhouse gas emissions because of 'in use' emissions associated with operational energy consumption and transport related emissions). However, the statement explains that all greenhouse gases are 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 set away from the more intensive development of the central Wembley Park area and the features identified in respect of Euro House. Whilst it is near residential uses to its south, these would not be overshadowed by the proposed development. Likewise, it is relatively close to uses to the north and west, however, as the massing is broken up, the overshadowing impacts are unlikely to be continuous.

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 most 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.