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26.08.25

Planning and Building Control
London Borough of Brent
Brent Civic Centre
Engineers Way
Wembley
HA9 0FJ

Sent electronically only.

Dear ,

Holiday Inn, Empire Way, Wembley, HA9 8DS

Request for a Screening Opinion in accordance with Regulation 6 of the Town and Country Planning (Environmental Assessment) Regulations 2017 (as amended 2018)

We write on behalf of our client, Splendid Hospitality Group (the Applicant), to request a formal Environmental Impact Assessment (EIA) Screening Opinion in accordance with Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulation 2017 (as amended 2018) (the EIA Regulations).

This request seeks confirmation from the London Borough of Brent ('LBB' or 'the Council') that an EIA will not be required as part of development proposals for the site to provide a hotel-led mixed-use scheme.

In accordance with the Regulations, this letter contains the following information:

- A description of the development, including the physical characteristics and location of the development;
- A description of the aspects of the environment likely to be significantly affected by the development;
- Where information is available, a description of any likely significant effects of the proposed development on the environment;
- A plan sufficient to identify the land.

Description of the Site and Proposed Development

The Site and Surroundings

The site measures 0.718 hectares and is currently occupied by the Holiday Inn, Wembley which is sited on the east side of Wembley Hill Road, within the boundary of the Wembley Growth Area. The existing Holiday Inn

building is set back from the street scene with a surface car park area to the front of the site. The Holiday Inn comprises a 12-storey hotel building with 1-2 storey wings to the north and south.

To the north, the site is bounded by Royal Route which runs east to west, providing access to the Holiday Inn itself and Wembley Stadium from Wembley Hill Road. To the north of Royal Route is York House and associated surface car parking area, which sits to the front of the site following a similar arrangement to the Holiday Inn Site. Leafy Lane lies to the south of the site and to the south of this is Williamson Heights with South Way and Wembley Stadium Station beyond this. The site is bounded by the Premier Inn to the east with the 'W10' Plot beyond this that is anticipated to be built on in the short term as part of the consented Wembley Masterplan by Quintain.

To the west of the site on the opposite side of Wembley Hill Road is Signia Court, an apartment building which occupies 55-63 Wembley Hill Road. To the rear of Signia Court, development decreases in density which demarcates the boundary of the Wembley Growth Area.

The area surrounding the site has undergone significant change of the last 25 years, as part of the wider Wembley Park regeneration, which has delivered new high-quality public realm and buildings. The Holiday Inn site formed part of the original 'Stage One Masterplan' outline planning permission (ref: 03/3200) for Wembley Park, which proposed the provision of various housing, leisure, retail and hotel facilities and associated works.

The site lies within the Wembley Growth Area and Opportunity Area. The site is also located within a tall buildings zone. There are a number of protected views set out within planning policy which will need to be considered. There is an area of Archaeological Importance which falls across the northern part of the site and the site is located within an Air Quality Management Area. There are no heritage assets located on the site. Wembley Arena is the closest listed building.

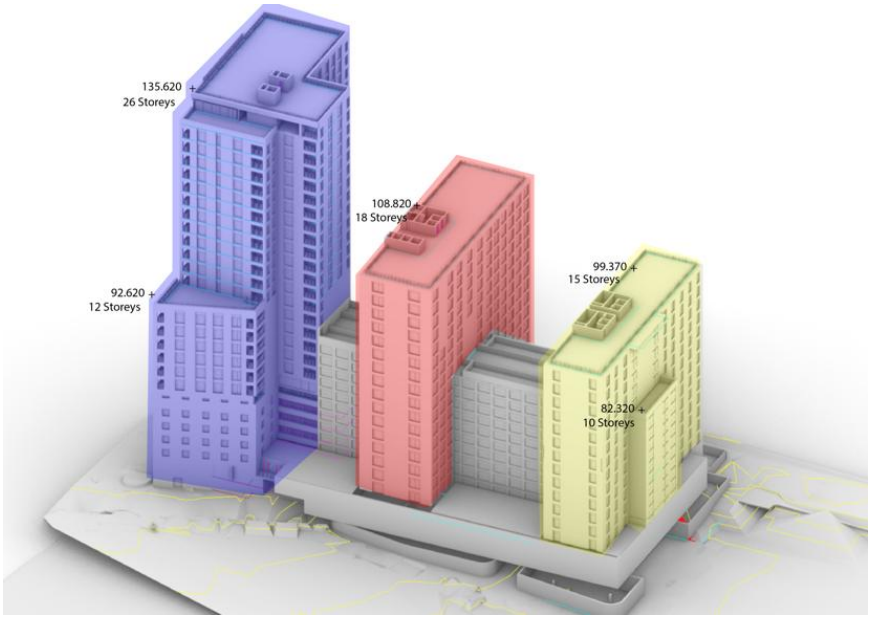
An indicative site location is shown at Figure 1 below, with the site edged in red.

Figure 1: Indicative Site Location

The site is located within a sustainable location and has a PTAL Rating ranging from 3 – 4 across the site. The site within walking distance of a number of public transport links, including Wembley Central Station, 300m to the south of the site, approximately a 4-minute walk. Wembley Park Station is 1km to the northeast, approximately a 14-minute walk. There are also several bus routes which run along Wembley Hill Road, with bus stops located within short walking distance of the site.

Proposed Development

The proposed development involves the retention and expansion of the existing hotel, delivering a total of 422 rooms (Use Class C1). In addition, the scheme is proposed to provide approximately 337 co-living units (Sui Generis), 167 build-to-rent apartments (Use Class C3), and 80 care units (Use Class C2). The proposed scheme is brought forward to optimise the site's potential through the introduction of three new buildings, ranging from 15 to 26 storeys in height. The axonometric diagram below illustrates the proposed massing and allocation of uses across the development.



The proposed massing strategy responds to the site's context and optimises its potential through a composition of three distinct buildings. The tallest element, shown in blue, rises to 26 storeys and is situated to the east of the site adjacent to Wembley Hill Road. This building will accommodate 80 care units across levels 1 to 5 (Use Class C2), with 167 build-to-rent apartments (Use Class C3) occupying the upper floors. Centrally located above the retained hotel is a new extension, rising to 18 storeys highlighted in red, which will deliver 86 additional rooms (422 total) (Use Class C1). Parts of the existing hotel will be demolished to enable this. To the west, the third element, in yellow, comprises a 15-storey building designed to accommodate 337 co-living units (Sui Generis), contributing to the residential diversity of the scheme.

In addition, the scheme incorporates new public realm and landscaping including a new footway on the southern side of Royal Route, vehicle drop offs, delivery and servicing bays, together with car parking and cycle parking.

EIA Screening Process

As set out within the EIA Regulations, development that falls within Schedule 1 of the Regulations always requires an EIA and is referred to as 'Schedule 1 development'. Development listed in Schedule 2 that is located within a 'sensitive area' (as set out in Regulation 2(1)) or exceeds one of the relevant criteria or thresholds set out at Schedule 2 is referred to as 'Schedule 2 development'. Not all 'Schedule 2 development' will require an EIA; only 'development likely to have significant environmental effects due to its size, location or nature'. Development that requires EIA is referred to as 'EIA development'.

As set out in Table 1 below, the proposed scheme is not Schedule 1 development, but falls within the description in Schedule 2 Part 10(b) 'Urban Development Projects'. The proposed development (as described above) is not

located within a sensitive area but would exceed a relevant threshold in Schedule 2 as it will include greater than 150 dwellings, and therefore comprises Schedule 2 development. As such, the proposed development would constitute EIA development if it is likely to result in significant environmental effects

As set out below, it is considered that the proposed development is not likely to result in significant environmental effects. Therefore, it would not constitute EIA development. In addition to the evidence and information presented below, the Planning Practice Guidance (PPG) provides indicative thresholds to assist in the determination of whether a project is likely to have significant environmental effects. For developments such as this, the PPG's indicative criteria and thresholds states that Environmental Impact Assessment is unlikely to be required *"unless the new development is of a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination."*

This is also in line with relevant EIA guidance provided in the PPG which states that *"only a very small proportion of Schedule 2 development will require an Environmental Impact Assessment"* (Paragraph: 018 Reference ID: 4-018-20170728).

Table 1: *Applicable EIA Thresholds*

Applications Thresholds		
i.	Does the proposed Development fall within Schedule 1 (Y/N)?	No
ii.	If yes, what is the applicable description?	N/A
If yes, the proposed development automatically requires EIA		
iii.	Does the proposed development fall within Schedule 2 (Y/N)?	Yes
iv.	If yes, what is the applicable description?	10(b) Urban Development Project
v.	Is any part of the proposed development to be carried out in a defined Sensitive Area (see Regulation 2(1))	No
vi.	What is the applicable threshold/criteria in Schedule 2?	(i) The development includes more than 150 dwellings
vii.	Does the proposed development meet / exceed the applicable threshold.	The scheme comprises a total of 422 rooms [adding 86 rooms to existing provision] (Use Class C1). In addition, the scheme will provide approximately 337 co-living units (Sui Generis), 167 build-to-rent apartments (Use Class C3), and 80 care units (Use Class C2).
If yes to (iii) and then (v) or (vii) the proposed development will require EIA if it likely to have significant effects on the environment.		

Screening Assessment

Possible effects on the environment

The following information has been prepared with reference to the selection criteria for screening Schedule 2 development, provided in Schedule 3 of the EIA Regulations:

- Characteristics of development (a) – (g) (of the Regulations)
- Location of development (a) – (c) (of the Regulations)
- Characteristics of the potential impact (a) – (h) (of the Regulations)

Features of the proposed development and any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment have been identified as per the PPG guidance at Paragraph 023 Reference ID: 4-023-20170728.

The applicant and project team has a good understanding of the possible environmental effects of the proposed development having had significant experience in delivering projects of similar scale and nature on a national level. The design of the site and buildings will reflect this experience and, as such, environmental mitigation is inherent in the proposals.

In the absence of inherent and additional mitigation and in advance of any judgments of the significance of individual effects, the possible environmental effects of the proposals are as follows:

- Townscape and visual effects – from identified and protected views. This has provisionally tested and given the extent of densification and the existing prevalence of tall buildings within the Wembley Growth and Opportunity Area, the visual change is not considered to be significant.
- Air Quality – from emissions and dust generated from the demolition and construction phases and emissions resulting from the occupancy of the buildings, including vehicular emissions.
- Noise and vibration – from the demolition and construction operations and from the use and functioning of the buildings.
- Hydrology, ground conditions and flood risk – the risk of flooding caused by the development and the management of flood risk both within the site and beyond its boundaries.
- Social and environmental effects – including the creation of additional employment opportunities at the site ,the creation of new employment during construction and the creation of additional hotel rooms and new homes .
- Transport – the traffic movements associated with the proposed development on the local road network and as a result of the construction phase of the development.
- Biodiversity and ecology – the effects on existing biodiversity and ecology from the proposals for the site and introduction of new landscaping, trees and open space and public realm within the development.
- Risks to human health – the risk of accidents or disasters resulting from the construction and operational phases of the proposed development.
- Cultural heritage – the effects of the proposals on the setting of nearby heritage assets and non-designated heritage assets.
- Climate change – the effects on climate through GHG emissions during the construction and operation phase.
- Ground conditions – the effects on ground conditions through the mobilisation of potential contaminants during the construction phase.
- Micro-climate – the effect of ground surface friction means that wind speeds generally increases with height. Consequently, impacts arising from wind are usually associated with taller buildings which can cause windward vortexes where the wind blows perpendicular to the building. The tallest building is currently 26 storeys. Therefore, it has been agreed with officers at LBB that a Wind Study is to be prepared and submitted with the application.

1. Characteristics of Development

a. The size and design of the whole development

The proposed development involves the retention and expansion of the existing hotel, delivering a total of 422 rooms (Use Class C1). In addition, the scheme will provide approximately 337 co-living units (Sui Generis), 167 build-to-rent apartments (Use Class C3), and 80 care units (Use Class C2). The proposals will optimise the site's potential through the introduction of three new buildings, ranging from 15 to 26 storeys in height. The retention of the existing hotel has been a principal consideration and will assist in reducing the overall embedded carbon of the development.

The current proposals include a range of buildings, with the tallest element situated to the east of the site adjacent to Wembley Hill Road. The scale of buildings vary across the site and drop down towards the east with 18 and 15 storey buildings. The existing Holiday Inn measures 12 storeys with two storey projections which will be demolished as part of the proposals. As such, the proposals would represent an increase to the general height of development on site. However, the site is located within Wembley Growth and Opportunity Area and it is also designated as a tall building zone where taller buildings are expected. The properties surrounding the site are all a considerable scale. Therefore, the proposals are in-keeping with the immediate surroundings.

The proposed scheme provides new public realm between the buildings and adjacent to Royal Route in addition to indoor and outdoor amenity space for occupants of the development. The footprint of the proposed new buildings are similar to the built form of the existing building and the buildings within the immediate and wider surroundings. Given this context and the existing use of the site, the magnitude of potential environment impacts is not considered likely to result in significant effects. The quantum of development proposed at the site makes efficient use of land and allows for additional usable areas of public realm.

Taking the above into account, the size and design of the proposed development is considered to be appropriate for the location and unlikely to result in any significant environmental effects.

b. The cumulation with other existing development and / or approved development

In respect of potential cumulative effects with other development, PPG advises that *"each application (or request for a screening opinion) should be considered on its own merits. There are occasions, however, when other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development. The local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development"* (ID 4-024-201740728).

Consideration has been given as to whether there is potential for likely significant effects to occur through the combination of the proposed development with other existing or approved developments. Given the site's location within the Wembley Growth Area, there are a number of consented developments situated within the surrounding area, particularly those within the Wembley Park Masterplan. Outline planning permission (Ref: 15/5550) was granted in 2016 for the redevelopment of 15.87ha of land surrounding the Wembley Stadium as part of the Wembley Park Masterplan. The Wembley Park development will deliver the majority of the residential-led mixed-use development within the Wembley Growth Area. Whilst much of this has been built out already (and therefore forms part of the baseline consideration), other consented developments have been considered as part of the cumulative assessment for this screening. This includes (not exhaustive):

- 21/2130 – Olympic House, Novotel, 5 Olympic Way. Buildings of 9, 22 and 25 storeys including 172 residential units (Class C3) a new hotel comprising 260 rooms (Class C1) and retail store plus extension to the existing hotel at 5 Olympic Way to provide additional 95 rooms. This is approximately 700m from the site. Approved 23 May 2025.
- 22/3965 – 1-4 and 9 Watkin Road. Buildings of 6, 18, 21 and 27 storeys to provide 1.490 sqm of commercial floorspace (Class E) and 200 bed student accommodation. This is approximately 750 m from the site. Approved 23/02/2024
- 23/0578 Olympic Way, 8 Fulton Road. 8 storey building to provide a purpose-built further education college campus. This is 600 m from the site. Approved 15.03.24.

- 24/1841 – Crescent House, 130-140 Wembley Park. Buildings of 18 storeys and 31 storeys to provide 307 residential dwellings (Use Class C3) and 179 sqm of commercial floorspace (Class E) and 216 sqm of flexible commercial/community floorspace (Class E/F2). This is 670 m from the site. Resolution to grant December 2024.
- 23/1426 – Glynns Skip Hire, Fifth Way. Buildings ranging between 5 and 15 storeys to provide 1,232 sqm light industrial floorspace (Class Eg), 100 sqm café (Class E) and 759 student beds (Sui Generis). This is approximately 650 m from the site. Resolution to grant November 2024.

Given the scale of the proposed development alongside surrounding schemes and considering the urban and built-up nature of the location, significant cumulative effects are not anticipated. The proposed development will complement the existing use on site and within the vicinity and will be appropriate for the Wembley Growth and Opportunity Area.

Most of the proposals within Wembley are designed to be 'car-free', offering minimal parking and promoting sustainable transport options, thereby resulting in low trip generation during operational phases and mitigating any strain on the existing road network. A review of application documents for adjacent developments indicates that, through the incorporation of appropriate mitigation measures, no significant environmental effects have been identified either in isolation or cumulatively. For example, the Council concluded for a similarly scaled scheme at 5 Olympic Way (Ref. 21/2130) that an Environmental Statement was not required as it was concluded that the development would not result in any substantial environmental impacts.

In relation to drainage, each development will independently manage its impact through tailored design solutions that prevent adverse effects on the broader water network. Consequently, the cumulative impact of these schemes, including the proposed development, is not expected to be significant.

Additionally, the potential for cumulative effects arising from multiple impacts acting on a single receptor, during both construction and operational phases, has been thoroughly considered. Based on the findings presented and the application of standard mitigation measures, it is concluded that such combined impacts are unlikely to result in significant cumulative effects.

c. The use of natural resources, in particular land, soil, water and biodiversity

The use of natural resources will be typical for an urban development project such as that proposed. Overall, given the scale and nature of the proposed development, it is not considered that it will result in any significant environmental effects related to the use of natural resources, as no unusual or excessive use would occur on any resources that are considered to be in short supply. It is not expected that any changes to the site levels will be significant. As such, significant amounts of natural resources are not expected to be required in order to create a suitable development platform.

Water

During the construction phase, certain activities will necessitate water usage, including the implementation of standard mitigation measures such as dust suppression. In the operational phase, water consumption will arise from the residential units and the existing and extended hotel and care use. The development will comply with the requirements of the London Plan, ensuring water efficiency with mains consumption not exceeding 105 litres per person per day. Given the scale and nature of the scheme, significant effects associated with water consumption are considered unlikely. Furthermore, any potential impacts during construction will be appropriately managed through the adoption of best practice techniques, as outlined in a Construction Environmental Management Plan (CEMP), to be secured via planning condition.

Biodiversity

The site currently accommodates the existing Holiday Inn Hotel and features a variety of trees and shrubs of mixed condition. A detailed tree survey undertaken by SJA has identified that all of the on-site trees are classified

as Category C or U, indicating low-quality specimens with limited arboricultural value. In addition, two off-site trees have been assessed as Category B, signifying moderate quality and value. The majority of trees situated along the Wembley Hill Road frontage are proposed to be retained, although their overall habitat and ecological contribution is considered limited. The proposals seek to retain the main part of the existing hotel, along with the majority of on-site vegetation, thereby minimising disturbance to the current landscape setting. The only partial demolition of the hotel and additional development on the site are not anticipated to result in the loss of any significant or sensitive habitats, nor adversely affect local biodiversity. The scheme is to be designed to target the delivery of an overall net gain in biodiversity through targeted landscape enhancements and ecological design measures.

Once operational, vehicle movements on-site, as well as associated noise and light emissions could potentially affect ecological receptors across the wider area, if unmitigated. However, the existing hotel use already accommodates a considerable level of parking and servicing. Additionally, the site falls within the Wembley Growth and Opportunity Area, characterised by a dense, high-rise urban context where ecological receptors are inherently limited. The proposed design will integrate embedded mitigation measures, including the retention of existing trees and the introduction of new landscaping. These interventions will help minimise ecological disturbance and ensure significant adverse effects are avoided. Furthermore, the proposals present an opportunity to deliver biodiversity net gains compared to the current baseline, through enhancements in habitat quality and coverage.

Soil

The site is within a built-up urban environment and as such is not currently in, nor is it suitable for agricultural use. The site has not been identified or allocated for mineral extraction and is not situated within a mineral safeguarding area.

Use of Materials

As with any modern development project, through the careful selection of materials and best practice construction methods, the consumption during construction and operation will be minimised. Overall, given the scale and nature of the proposed development, significant environmental effects related to the use of natural resources is considered unlikely.

d. The production of waste

The nature of the proposed development is such that excessive or abnormal waste generation is unlikely to occur during either the construction or occupation phases. During the construction phase, best practice construction methods will be adopted, controlled via a Construction Environmental Management Plan (CEMP), to ensure that construction waste is appropriately managed. It is anticipated that the implementation of the CEMP will be a condition on any planning permission granted.

The proposed development will generate household waste and operational waste associated with the hotel and care use, predominantly comprising general domestic refuse and recyclable materials. Some minor scale medical waste can be expected associated with the care. However, given the nature and scale of the proposed uses, waste generation is not anticipated to be excessive or abnormal. As such, the potential effects of waste arisings during the operational phase are considered unlikely to be significant. Dedicated and separate waste management strategies will be incorporated for each use within the development, ensuring appropriate collection, storage, and disposal solutions are in place to support efficient and sustainable waste handling.

e. Pollution and nuisances

Traffic

This screening letter is submitted alongside a Transport Scoping Note prepared by i-Transport.

During the demolition and construction phases, an increased number of Heavy Goods Vehicles (HGVs) will be required to access the site to facilitate the removal of demolition waste and the delivery of construction materials. Although this may exceed the current baseline level of traffic, the site already experiences regular vehicle movements associated with hotel operations and servicing activities. The surrounding area , due to its high-density development and proximity to popular visitor attractions, is already characterised by servicing and delivery traffic. Consequently, any increase in traffic during construction is expected to be minor, temporary, and manageable.

To mitigate potential disruption, vehicle movements will be regulated through a routing agreement and timing restrictions as necessary. While short-term impacts on local traffic may occur, affecting residents and workers in the vicinity, the site is served by a robust and well-established transport network. Accordingly, with the adoption of standard control measures—including the preparation and implementation of a Construction Logistics Plan (CLP), significant environmental effects during the demolition and construction phases are considered unlikely.

The proposals will incorporate provision for cars, coaches, cycles and servicing. The submitted Transport Assessment (TA) will include a comprehensive review of existing off-site walking, cycling, and public transport infrastructure. This will also encompass an assessment of travel distances to key amenities and services via sustainable modes.

Additional vehicular movements related to servicing, pick-up and drop-off activity, and access are anticipated. However, considering the site's current use and its accessible urban location, any increase in vehicle activity is expected to be modest and unlikely to give rise to significant environmental or traffic-related effects. A suite of mitigation measures will be implemented to manage these movements, as detailed in the accompanying Scoping Note. This includes the submission of a Travel Plan, Construction Logistics Plan, Delivery and Servicing Plan and Parking Management Plan.

Noise

The existing roads surrounding the site are currently the predominant sources of ambient noise, with elevated noise levels particularly evident during major sporting or cultural events. Evening and night-time activity is also influenced by the leisure economy, contributing to a fluctuating acoustic environment.

During demolition and construction phases, the use of machinery and associated construction traffic may introduce additional noise sources. Given the proximity of noise-sensitive receptors, there is potential for adverse effects. However, these impacts are expected to be temporary and will be managed through appropriate mitigation measures.

Deliveries related to the care home, hotel, and residential elements, as well as routine waste collection, will occur regularly. Nevertheless, considering the site's existing urban context and operational background, the associated traffic noise is anticipated to remain within acceptable limits. As such, no significant noise effects are expected from traffic movement.

The hotel, residential and care uses are not considered to be inherently noise-generating. While some operational noise may be emitted from mechanical plant and building services, all plant will be designed to comply with relevant local planning policies and British Standards. These controls will safeguard nearby receptors and ensure that the proposed development does not result in significant adverse noise effects.

Air Quality

An Air Quality Assessment will be undertaken to support the planning application, with key considerations focusing on potential impacts to existing receptors arising from emissions during the demolition, construction, and operation phases of the proposed development. Another important consideration is the suitability of the

site for its intended use, particularly given its location within the Brent Air Quality Management Area (AQMA). This borough-wide designation reflects exceedances of the annual mean Air Quality Strategy (AQS) objectives for nitrogen dioxide (NO_2) and particulate matter (PM_{10}), primarily attributed to road traffic emissions.

While some dust generation is anticipated during demolition and construction activities, these emissions will be effectively managed through planning conditions and industry-standard control measures. It is noted that existing site operations through servicing of the hotel, the proposed development is not expected to introduce significant changes relative to the current baseline. In line with IAQM guidance, the adoption of best practice mitigation techniques will ensure that residual impacts on air quality are not significant. Measures may include the implementation of a dust management plan, physical screening of dust-generating activities, and the use of water-based suppression methods.

Emissions from construction vehicles can be further mitigated through good practice protocols, such as prohibiting vehicle idling and adhering to clean fuel standards. In addition, emissions from construction plant and non-road mobile machinery (NRMM) are expected to be limited given the scale of the development. These controls will be set out and managed through a comprehensive Construction Environmental Management Plan (CEMP), ensuring air quality impacts remain within acceptable levels throughout the construction lifecycle.

Daylight and Sunlight

A detailed Daylight and Sunlight Assessment will be undertaken in support of the new proposals in accordance with the BRE Guidance, to ensure that there are no significant adverse impacts on surrounding properties.

Wind

The introduction of tall buildings has the potential to alter the microclimatic conditions of their surrounding environment. At street level, newly established built form may act as a physical barrier, reducing prevailing wind flows. Conversely, urban massing can result in localised wind intensification due to channelling effects—commonly referred to as the 'wind tunnel' phenomenon, where wind is accelerated through constrained spaces between buildings, potentially affecting pedestrian comfort and safety in adjacent public realm areas.

In the early stages of construction, where the scale of the proposed development is broadly consistent with the existing built form, alterations to the wind environment are anticipated to be negligible.

As construction progresses and the development nears completion, the emerging massing will begin to exert a more discernible influence on the local wind microclimate. The extent of any impacts will be largely governed by building height and orientation, with taller elements contributing to greater aerodynamic displacement and more noticeable microclimatic effects.

To proactively manage any potential wind effects, the scheme will incorporate design mitigation measures. These may include architectural interventions, landscaping strategies, and public realm enhancements, all aimed at ensuring compliance with recognised comfort criteria both within the site and in surrounding pedestrian zones during the operational phase.

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

The site's location within the UK is such that natural disasters, including those caused by climate change, do not present a likely risk to the proposed development.

Whilst it is recognised there is always a potential risk that an accident, fire or natural disaster could result in a significant environmental impact, this risk can be appropriately mitigated through embedded design measures and through compliance with statutory design guidelines. Therefore, significant effects are considered to be unlikely.

Workers involved in the construction of the proposed development would be exposed to the normal risks associated with construction. The risk of accidents and harm to human health and the environment is considered to be insignificant given the nature of the proposed development.

Climate Change

Aspects of the proposed development such as the infrastructure and functionality of the building and users will be subject to current and future changing climates. Summers are likely to become warmer and drier, whilst winters are likely to be warmer and wetter. Opportunities to increase the resilience of the proposed development to climate change will primarily be incorporated into the design.

It is therefore considered that the proposed development will be resilient to future climate scenarios and would not be vulnerable to any significant impacts as a result of climate change.

2. Location of Development

a. The existing and approved land use

The site is currently occupied by an hotel. The proposed development seeks to extend the existing hotel use while introducing a range of complementary uses which respond to the site's designation within The Wembley Growth and Opportunity Area. The scheme represents development on a brownfield site and is consistent with the prevailing land uses within the surrounding area. Importantly, the proposals will not introduce any new categories of sensitive receptors beyond those already present on-site. The site is located in the urban area where there is a presumption in favour of sustainable development. The proposal would seek to utilise brownfield land, making the most efficient use of the site.

In relation to criteria 2 (b) and (c), the site is not subject to any statutory environmental, landscape or heritage designations. Consideration is given below to potential environmental impacts by virtue of the site's location. Consideration has also been given to any high quality and scarce resources on and around the site which could be impacted by the development.

Townscape

The site currently accommodates a 12-storey hotel and is characterised by its urban setting. The proposed development will result in a noticeable change to the townscape appearance due to the introduction of new built form; however, this change will occur within a context that is already defined by significant urban density and development.

The scale and massing of the proposed scheme will increase compared to the existing built form, which will in turn alter views of the site during both the construction and operational phases. Notwithstanding, the design is considered to be in keeping with the established urban grain and massing of the surrounding environment, and visual changes at identified receptors are not expected to be significant in Environmental Impact Assessment (EIA) terms.

The site falls within the designated Wembley Growth Area and Opportunity Area, where the intensification and optimisation of land uses is actively encouraged. In line with the strategic objectives of the London Plan, Opportunity Areas are expected to deliver substantial levels of housing and employment growth. This ambition is reflected in Brent Local Plan Policy BCGA1, which emphasises Wembley's role in driving borough-wide economic regeneration and acknowledges its importance within the wider London context. In this regard, development of the scale proposed is considered appropriate. In addition, the site is located within a Tall Building Zone, and the height and form of the proposals are consistent with policy expectations for this area.

The Wembley area includes a series of protected strategic views aimed at conserving the visual prominence of Wembley Stadium. A review of these views in relation to the proposed development confirms that the new massing will be consistent with the evolving context of the locality and would not result in significant adverse effects on views of the stadium arch, particularly when considered alongside other recent and consented developments in the vicinity.

Archaeology and Heritage

An area of Archaeological Importance sits within the northern part of the site. There are no heritage assets located on or within the immediate vicinity of the site (Wembley Arena is the nearest listed building).

During construction, standard 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.

Potential environmental effects associated with the development will be proportionately balanced by its public benefits. These impacts will be avoided or minimised through the implementation of a comprehensive programme of archaeological mitigation, developed in consultation with the Greater London Archaeology Advisory Service (GLAAS). GLAAS serves as the archaeological advisor to the local planning authority and will provide guidance throughout the process to ensure compliance with heritage and planning obligations.

Noise

The primary sources of existing noise in the vicinity of the site include the surrounding local highway network, the operational activity associated with the existing hotel (including guest movements and servicing), and nearby commercial and leisure uses, notably Wembley Stadium. While the introduction of additional uses will result in an uplift in site activity and associated movements, this is not expected to give rise to significant environmental and noise impacts. Potential effects and relevant mitigation measures are addressed in the accompanying Transport Scoping Note.

During the demolition and construction phases, standard environmental management procedures will be implemented through a Construction Environmental Management Plan (CEMP). These will include the use of modern, low-noise plant and machinery, adherence to defined working hours, and traffic controls outlined in the Construction Traffic Management Plan (CTMP). Collectively, these measures are expected to effectively minimise noise and vibration during construction, ensuring that any impacts remain within acceptable thresholds and are not significant in EIA terms.

In the operational phase, the development will be designed to ensure compliance with applicable planning policies and industry standards relating to noise emissions from external plant. Where necessary, plant will be enclosed within purpose-built acoustic screening to mitigate environmental effects. Internally, the proposed scheme will incorporate appropriate acoustic insulation measures—including double glazing and soundproofing elements—to ensure a comfortable noise environment for future occupants. Accordingly, the operational development is not expected to result in significant noise or vibration effects.

Flood Risk and Drainage

According to the Environment Agency's Flood Map, the site is located within Flood Zone 1, indicating a low risk of flooding from fluvial or tidal sources. As such, the proposed uses are considered appropriate in flood risk terms.

Given the scale of the proposed development, a detailed Flood Risk Assessment (FRA) will be undertaken to evaluate both the potential flood risk to the site and any resulting impacts from the development itself during operation.

The drainage strategy will be designed to accommodate a 1 in 100-year rainfall event, plus an allowance for climate change, in line with best practice standards. Surface water discharge rates will be restricted to greenfield runoff rates to ensure compliance with local authority requirements and to mitigate any increase in flood risk downstream.

As the site is already developed, the proposed scheme will not result in a material change to the extent of impermeable surfaces. The redevelopment offers an opportunity to enhance existing drainage infrastructure, notably through the introduction of Sustainable Drainage Systems (SuDS). These will manage peak flows, improve infiltration, and enhance water quality, thereby reducing both on-site and off-site flood risk.

Accordingly, the proposed development is not expected to give rise to any significant flood-related environmental effects.

Socio-Economics

The proposed development is expected to generate significant employment opportunities during both the construction and operational phases for all uses but particularly for the hotel and care element. In addition to job creation, the introduction of a new hotel will attract visitors who will contribute to the local economy through increased spending. The development will also bring new residents to the area, further stimulating economic activity and supporting local businesses. The proposed scheme will foster social interaction by creating welcoming spaces that encourage people to meet, connect, and engage.

3. Types and characteristics of the potential impact

The likely significant effects of the development on the environment must be considered in relation to the [the above] criteria with regard to the impact of the development on the factors specified in regulation 4(2) taking into account -	
a) The magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected)	Due to the urban nature of the site and the surroundings and the limited sensitivity of the local environment to such a proposal, the magnitude and spatial extent of the impact will be local in nature both geographically and in terms of the population that could potentially be affected. The site is considered to have the capacity to accommodate the level of development proposed.
b) b) The nature of the impact	The proposed development is of a scale that the local highway network can sustain, and mitigation and safeguarding measures mean that no significant impacts are likely to occur. The site is currently developed with a busy and active use, therefore the nature of impacts is not considered to change to a significant degree from the existing baseline.
c) The transboundary nature of the impact;	Impacts are unlikely to be transboundary, given the scale and nature of the proposed development.
d) The intensity and complexity of the impact;	The overall impact of the proposed development is anticipated to be of a standard intensity and complexity, commensurate with a scheme of this scale and character. As outlined, any potential environmental effects arising from the development can be effectively mitigated through the application of established and widely accepted measures.

e) The probability of the impact;	All of the potential impacts and their probability are understood and predictable. With the relevant mitigation measures discussed above, none of the potential impacts are considered likely to result in significant effects.
f) The expected onset, duration, frequency and reversibility of the impact;	The potential for temporary impacts to arise during the construction phase have been outlined above. However, these will be minimised through adherence to best working practices. The duration and reversibility of some proposed impacts would be considered permanent (but not significant) as the proposed development is intended to be a high quality, sustainable, long-term construction and there is no expectation with regards to decommissioning. Once the development is operational, the impacts of the development will not be significant in the context of other land uses in the immediate area.
g) The cumulation of the impact with the impact of other existing and/or approved development;	The possibility of cumulative impacts has been considered in association with selection criteria 1(b). There are no known consented schemes within the vicinity of the site which would give rise to cumulative impacts.

Summary

The proposed development does not qualify as a Schedule 1 development and is not located wholly, or partly, within a 'sensitive area' as defined in Regulation 2(1). It does, however, fall within the description of 'Infrastructure Project (b) Urban Development Projects' in Schedule 2 of the Regulations and exceeds the relevant threshold as the site area exceeds 1 hectare and the proposal includes more than 150 dwellings.

To determine whether the proposed development comprises EIA development, it is necessary for the local planning authority to consider whether it is likely to have significant effects on the environment, taking account of the selection criteria in Schedule 3 Regulations.

Our assessment concludes that the characteristics and location of the development are unlikely to give rise to significant environmental effects. Furthermore, as set out in this letter, with the implementation of suitable design alongside mitigation and avoidance measures, and best practice construction methods, it is considered that significant environmental effects are unlikely to arise and therefore the proposal would not constitute EIA Development under the EIA Regulations.

Any effects, whether local or otherwise, can be satisfactorily addressed through supporting information accompanying the planning application, which can be controlled by condition, such that significant effects are unlikely and any environmental considerations and constraints can be suitably addressed. It is envisaged that the planning application will be supported by a series of technical reports.

I would be grateful for confirmation of receipt of this letter and prompt receipt of the Council's Screening Opinion in accordance with statutory timescales. Please feel free to contact me or my colleague, (), if you have any queries or would like to discuss in more detail.

Yours faithfully

Associate Director