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30th June 2022

Dear Sir / Madam,

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

Proposal: Request for Screening Opinion as to whether an Environmental Impact Assessment is required for the proposed redevelopment of the site, to provide a development of up to 670 student accommodation units in blocks of up to 14 storeys in height and up to 4200 sqm of employment floorspace (Class E (g)(ii) and (iii)) at ground and first floor level. On the northern parcel of land, a block of 14 storeys (+88.5 AOD) is proposed, along with internal student amenity space. On the southern parcel, up to a maximum of +79.0 AOD is proposed. The student housing is expected to be car free and cycle stores will be provided.

Site: Wembley Edge, Glynn's Skip Hire, Fifth Way, Wembley HA9 0JD

I write in connection to your screening request submitted on 13th June 2022. 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 screening request from the applicant, plus other material that is mentioned in association with this screening opinion, 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 faithfully,

A handwritten signature in black ink that reads "P. Lewin".

Paul Lewin
Team Leader Planning Policy

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

Description of proposed development – Request for Screening Opinion as to whether an Environmental Impact Assessment is required for the proposed redevelopment of the site, to provide a development of up to 670 student accommodation units in blocks of up to 14 storeys in height and up to 4200 sqm of employment floorspace (Class E (g)(ii) and (iii)) at ground and first floor level. On the northern parcel of land, a block of 14 storeys (+88.5 AOD) is proposed, along with internal student amenity space. On the southern parcel, up to a maximum of +79.0 AOD is proposed. The student housing is expected to be car free and cycle stores will be provided.

Site – Wembley Edge, Glynn's Skip Hire, Fifth Way, Wembley HA9 0JD

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

Savills requested a screening opinion from London Borough of Brent (the Council) on 13th June 2022. 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 an elongated parcel of land approximately 0.6ha in size. The site is divided by Fifth Way, with the larger parcel to the south of the road and a smaller parcel to the north of the road. Access to the site is from Fifth Way.

The site currently comprises a number of industrial buildings of varying sizes associated with the waste transfer and processing operations of Glynn's Skips. The northern part of the site (to the north of Fifth Way) accommodates a number of shipping containers and container style buildings, as well as areas of storage and hard standing. The site is enclosed by fences and neighbouring buildings which abut the site on the east and west sides at the southern end of the site.

The surrounding land uses are varied and have been subject to significant re-development and transformation in recent times. Neighbouring the site to the west is the recently developed Pavilion Court (part of the Kelaty House development) which offers private student accommodation and serviced apartments. Arch View House (former Cannon Trading Estate) is also located to the west which provides further student accommodation. Within the existing and emerging context of the site, further residential uses are present and proposed. The two surrounding land uses to the east and north of the site are predominately commercial and industrial and the site is adjacent to Wembley Strategic Industrial Location (SIL) which is identified as an employment site of strategic importance for London. Wembley Stadium is located approximately 250m to the south west of the site at the nearest point.

The site has a PTAL of 3, indicating moderate accessibility to public transport options. The Metropolitan, Jubilee and Bakerloo underground lines run from Wembley Central and Wembley Stadium station runs an over ground line (approximately 1.5km and 0.9km south

west, respectively), reaching Central London in circa 10-15 minutes. Wembley Park Station is located approximately 0.6km north west.

The Site does not lie within or near a Conservation Area or an Archaeological Priority Area. There are limited heritage assets within close proximity of the site, the closest being:

- Grade II listed – Wembley Arena (formerly the empire pool), approx 0.6km west
- Grade II listed – 3 K6 Telephone Kiosks, approx 0.6km west
- Grade II listed – Brent Town Hall, approx 0.8km north

The closest scheduled monument to the Site is a 'Medieval moated site, 454 m south-west of Sudbury Golf Club House', which is approximately 3.2 km to the south west of the Site. 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.

The site is located within Flood Zone 1 in relation to fluvial flooding, but part of the southern parcel of the site is located within Flood Zone 3a for surface water flooding. The site does not have ecological designations. Wealdstone Brook is located approximately 70m from the northern tip of the site (at its closest point), and is designated as a Grade II Site of Interest for Nature Conservation (SINC) of Borough Importance. The site is within an Air Quality Management Area (AQMA), and given current and historic industrial use, there is a risk of contamination. The site is also a protected site within the West London Waste Plan.

The subject site is located within site allocation BCSA9 (First Way), in the Brent Local Plan and is allocated for residential-led, mixed use development, including educational and industrial. The site is also located within Wembley Growth Area and is within a Tall Building Zone. The allocation requires development to seek the maximum re-provision of industrial uses and, in the event that waste cannot be accommodated in the development, suitable capacity for the waste function is to be provided elsewhere. According to supporting information, the practical capacity of the site has been determined to be 29,500 tonnes per annum, and a review of potential offset capacity has been undertaken which concluded that approximately 103,000 tonnes could be accommodated on two sites in Brent which would compensate for the loss.

The Size and Design of the Proposed Development

The proposal is for redevelopment of the site, to provide a development of up to 670 student accommodation units in blocks of up to 14 storeys in height and up to 4200 sqm of employment floorspace (Class E (g)(ii) and (iii)) at ground and first floor level. On the northern parcel of land, a block of 14 storeys (+88.5 AOD) is proposed, along with internal student amenity space. On the southern parcel, up to a maximum of +79.0 AOD is proposed. The student housing is expected to be car free and cycle stores will be provided.

Information Provided in Support of the Request for a Screening Opinion

The request for screening opinion has been submitted with a supporting statement and site location plan setting out an analysis of the likely environment effects of the proposal. This information has been utilised, as necessary, to inform this EIA Screening Opinion.

Previous History

As there is an extensive planning history to the site, only permissions from the past 25 years are summarised below.

10/2680 - Construction of an extension to front yard of existing waste transfer station to enclose existing operations, removal of existing trommel and installation of new trommel within the front enclosure, with associated soft landscaping improvements along Fifth Way frontage – granted 05/09/12

07/0330 - Demolition of existing maintenance/office buildings and erection of 4 portocabins for use as offices/WC/store – granted 02/04/2007

06/0313 - Certificate of lawful existing use for the acceptance, handling and transport from the site of putrescible waste every day at all times in breach of condition 6 of full planning permission 94/0329 dated 22/9/1994 for extension of waste transfer station, including new location of portal frame building and planning permission 95/0566 dated 11/07/1995 which varied condition 6 – granted 02/05/2006

01/1628 - Renewal of planning permission 00/0769 dated 21/06/2000 for installation of containers for use by the local community to deposit waste in connection with use as civic amenity site – granted 06/12/2001

00/0769 - Renewal of planning permission 97/2660 dated 09/02/98 for installation of containers for use by the local community to deposit waste in connection with use as civic amenity site – granted 21/06/2000

99/0152 - Renewal of planning permission 97/2660 dated 09/02/98 for installation of containers for use by the local community to deposit waste in connection with use as civic amenity site – granted 29/03/1999

97/2660 - Renewal of full planning permission reference 95/1335 dated 12/12/95 for installation of containers for use by the local community to deposit waste in connection with use as civic amenity site - granted 09/02/1998

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:

18/3381 – 10 & 11 Watkin Road, Wembley, HA9 0NL - Demolition of existing buildings and redevelopment of the site to provide 217 residential units and 789sqm of affordable workspace (Use Class B1(c)) across ground floor and first floor, in a new building ranging between 2 and 23 storeys together with associated infrastructure works including private and communal space, car parking, cycle storage and public realm improvements (revised description) subject to a Deed of Agreement dated 15th March 2019 under Section 106 of the Town and Country Planning Act 1990, as amended. **Granted 15th March 2019.**

Subsequently amended by reference **19/2750** - Non-material amendment to the approved scheme to include an additional storey of accommodation and 12 additional units within the approved building envelope with associated works and fenestration improvements of full planning permission reference 18/3381 dated 15/03/2019. **Granted 09/09/2019 and under construction (nearing completion)**

17/1392 – York House, Empire Way – Prior approval for change of use at part ground floor, floors 1 to 8 and part 9th to 15 floors from office (Use class B1a) into residential (Use class C3) involving the creation of 360 studio flats with provision of communal facilities and gym

on 15th floor and cycle storage on 1st floor. **Approved 23rd May 2017, and under construction. A number of further prior approval applications have been approved (18/2197; 18/1969; 17/3856) however none of these exceed the 360 dwellings approved in 17/1392. Application 19/0073 at the same site proposes the following:** Change of use of part of ninth floor (Use Class D1) to provide 9 residential units and partial demolition of existing fifteenth floor with new fifteenth and sixteenth floors to provide mixed use multi-functional leisure, co-working, provision of amenity space and external terrace to serve additional residential units in association with approved prior approval for change of use of the building to residential use (Use Class C3) – **Granted 7th June 2019 –Under Construction (nearing completion)**

17/5097 Olympic Way Office, 8 Fulton Road, Wembley, HA9 0NU. Redevelopment of the Olympic Office Site and erection of a part-21 and part-15 storey building comprising 253 residential units (12 x studios, 91 x 1-bed, 107 x 2-bed and 43 x 3-bed), 1,051m² of flexible retail uses (A1, A2, A3, D1, D2), car parking at basement level, with associated landscaping, plant room and amenity space. **Granted 15/04/2021. 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:

NW09/10 – 18/4422 - Reserved Matters – Granted 19/02/2019 - Started
NE02 – 21/2517 - Reserved Matters – Granted 22/10/2021 – Not Started
NE03 – 21/2424 – Reserved Matters – Granted 22/10/2021 – Started

14/4931 – Land Surrounding Wembley Stadium Station, South Way, Wembley -

A hybrid planning application, for the redevelopment of the site to provide seven mixed use buildings up to 19 storeys in height accommodating:

- outline planning permission for up to a total of 75,000sqm to 85,000sqm mixed floor space including
- up to 67,000sqm of C3 residential accommodation (approximately 725 units);
- 8,000sqm to 14,000sqm for additional C3 residential accommodation,
- C1 hotel and/or sui generis student accommodation (an additional approximate 125 residential units;
- or 200-250 bed hotel; or approximate 500 student units; or approximate 35 residential units and 200 bed hotel);
- 1,500sqm to 3,000sqm for Classes B1/A1/A2/A3/A4/D1/D2;
- together with associated open space and landscaping; car parking, cycle storage, pedestrian, cycle and vehicle access; associated highway works; improvements to rear access to Neeld Parade; and associated infrastructure
- full planning permission for a basement beneath Plots SW03 - SW05 to accommodate 158 car parking spaces and 9 motor cycle spaces; Building 3A within Plot SW03 to accommodate 188 residential units and 150 cycle spaces; and associated infrastructure, landscaping, open space, vehicular access and servicing

and subject to a Deed of Agreement dated 23 December 2016 under Section 106 of the Town and Country Planning Act 1990, as amended. **Granted – 23/12/2016.**

Some of the buildings are complete and operational, others are still under construction. The following Reserved Matters has been approved in relation to the Outline application above and is Under Construction:

SW01, SW02, SW07 – 18/0742 - Reserved Matters – Granted 06/07/2018 – Started

15/3599 - Red House building, South Way, Land and Pedestrian walkway between South Way and Royal Route, Wembley Park Boulevard, Wembley - A hybrid planning application for the redevelopment of the site including:-

- Full planning permission for the demolition of existing building and erection of a 13-storey building comprising a 312-bed hotel (Use Class C1) with ancillary and/or ground uses including a restaurant, bar, offices and gym (Use Classes A1-A4/B1 and/or D2) (referred to as Plot W11), on-site cycle parking and
- Outline planning permission for the demolition of existing building (The Red House, South Way) and erection of a 4-storey building comprising 1610sqm of and/or A1-A4/B1/D1 and D2 uses, with all matters reserved (referred to as Plot W12) and new pedestrian boulevard (outline).

with associated service yard, landscaping and infrastructure works (as amended). **Granted – 27/07/2016 – Started**

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 – 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 – Not Started**

Note: 20/2033 has also been granted at the Euro House site, proposing up to 21 storeys. However, the impacts of 21/2989 have been considered within this screening opinion it constitutes a greater scale of development.

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. **Awaiting S106.**

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 – **Awaiting S106**.

Other Environmental Assessments

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

Development Plan

The Brent Local Plan (2019 – 2041) was adopted at Full Council on the 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 up to 670 student accommodation units and therefore would constitute Schedule 2 development as it exceeds the threshold for 150 dwellings.

Consideration must therefore be given to whether the proposed development may give rise to significant environmental effects, such that an EIA may be required.

Likely Significant Effects

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

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

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

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

Appendix A – Consideration of Likely Significant Effects

Air Quality

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

There are a number of sensitive receptors in close proximity to the proposed development site, including student accommodation and businesses.

Documentation Accompanying the Planning Application: *An Air Quality Assessment will be undertaken to support the planning application.*

Construction

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

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

Whilst there is the potential for adverse effects, with the implementation of standard best practice measures, it is not anticipated that the effects would be significant. 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. These standard mitigation measures can be implemented through a Demolition and Construction Environmental Management Plan (DCEMP), which can be secured through a standard planning condition.

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

Operation

Air quality emissions during operation will be from traffic generation and heating systems. Consideration also needs to be given to the potential effects on the new internal receptors given the location for the proposed development adjacent to a relatively heavy trafficked road. The Council is likely to seek technical reports that show how at least an air quality neutral development can be achieved, and as it is a growth area can ideally achieve an air quality positive development consistent with Local Plan policy.

Supporting information states that during operation, it is anticipated the proposal will not result in a material change in local traffic movements and may lead to reductions in overall vehicle movements. It appears that limited vehicle parking will be provided on site, with the screening request stating that the student housing is expected to be car free, with cycle stores being provided. This reflects the site's relatively accessible location in terms of travel by foot, cycle and public transport. It is likely that any impact to the local population arising from vehicle and pedestrian movements would be related to the proposed employment uses and the student accommodation units, however sustainable methods will be encouraged through cycle parking provision and facilitated by relatively close proximity to Wembley Park Underground Station plus bus routes.

Parking controls are likely to be increased in the surrounding area to deal with potential displacement off-site. This, along with measures to support walking, cycling and public transport is likely to reduce private car use. Taking this into account the level of net traffic generation resulting from this development is likely to be negligible. As such emissions from vehicle movements will be minimal, and therefore effects are not considered to be significant.

It is not clear how the development will be heated. If heated by gas powered boilers, such a system is likely to adequately disperse fumes through a suitably designed flue system and therefore the impact on local air quality will be negligible. As such significant effects are not considered to be likely. Any building services plant / energy centre will be designed to minimise NOx emissions rates in line with London Plan Guidance. As such significant effects are not considered to be likely. Given the proximity of commercial to residential (student accommodation units) it is assumed that occupiers are unlikely to undertake activities that will generate potentially significant impacts on air quality. Such uses would be subject to environmental health legislation.

Consideration also needs to be given to the potential effects on the new internal receptors given the location for the proposed development adjacent to in part to a relatively heavily trafficked road and within an AQMA.

There is the potential for the proposed development to contribute to improving air quality in the local area compared to the current use and also the requirement for Air Quality Positive.

Mitigation

The Council is likely to seek an air quality positive development. During the construction phase a DCEMP should be implemented which implements suitable measures to reduce the impact of dust and emissions. This can be secured via planning conditions.

The developer should consider the potential impact of air quality and dust on occupational exposure standards (to minimise worker exposure) and breaches of air quality objectives that may occur outside the site boundary. Continuous visual assessment of the site should be undertaken and a complaints log maintained in order to determine the origin of a particular dust nuisance.

For the operational phase, suitable mitigation to be secured through a planning condition to ensure that new internal receptors are adequately protected.

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 (including Healthy Street Assessment and Draft Travel Plan) and measures to reduce reliance on the private car, for example through provision of sufficient cycle parking and potential S106

contributions to implementing a wider controlled parking zone will ensure reductions in impact through vehicle movements.

Local Heritage

Documentation Accompanying the Planning Application: *It is not clear whether a Heritage Assessment will be submitted with a future planning application. A Townscape and Visual Impact Assessment will be submitted, which may address the issues below.*

The Site does not lie within or near a Conservation Area or an Archaeological Priority Area. There are limited heritage assets within close proximity of the site, the closest being:

- Grade II listed – Wembley Arena (formerly the empire pool), approx 0.6km west
- Grade II listed – 3 K6 Telephone Kiosks, approx 0.6km west
- Grade II listed – Brent Town Hall, approx 0.8km north

The closest scheduled monument to the Site is a 'Medieval moated site, 454 m south-west of Sudbury Golf Club House', which is approximately 3.2 km to the south west of the Site. 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.

The impact of the scale and height of the proposed buildings through the Design and Access Statement and Townscape and Visual Impact Assessment should allow sufficient clarity of impact on the setting of features of historic or cultural importance and Conservation Areas.

It is likely for the most part to be visually separated from listed buildings by development already constructed as well as that likely to be constructed as a result of planning permission 15/5550, plus potentially the proposed development at Euro House (21/2989 & 20/2033). Supporting information states that the emerging designs represent an improvement of the site in its current use as a waste site. The justification of the heights and form of the development together with its impacts on the setting of the stadium/longer distance views can be set out in Design and Access Statement and the Townscape and Visual Impact Assessment.

The site has already been subject to significant urban development and can be considered to have a generally low archaeological potential for all past periods of human activity. Past post depositional impacts are considered severe as a result of previous development. Supporting information notes that a programme of archaeological mitigation will be drawn up in consultation with the Greater London Archaeology Advisory Service and that any potential environmental effects can be balanced by the public benefits of the scheme and avoided or minimised by the implementation of the agreed programme of archaeological mitigation fieldwork.

On the basis of the available information no further archaeological mitigation measures are recommended in this particular instance.

The Council considers that given the scale of the development and the urban nature of its location the proposed development would not lead to significant adverse environmental effects on heritage assets, as such an EIA is not required in respect of heritage and cultural impacts. It is important to note that whilst the effects are not considered to be significant in relation to the EIA Regulations, this does not preclude the Council from taking into account the adverse effects (and their acceptability) when determining the planning application.

Climatic Factors

Documentation Accompanying the Planning Application: *The following will be required alongside a planning application: Wind Microclimate Assessment, Overheating Assessment, Sustainability Statement, Whole Life-Cycle Carbon Assessment, Energy Statement including BREEAM Pre-Assessment, Circular Economy Statement.*

Construction

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

Operation

Supporting information notes that opportunities to increase the resilience of the proposed development in relation to climate change will be primarily incorporated into the design. Opportunities to minimise carbon emissions will be incorporated via a 'fabric first' approach low carbon heat generation, and zero carbon. Energy efficient systems will be incorporated such as MVHR, LED lighting and smart controls.

It is considered that the proposed development will be able to achieve the necessary carbon reduction targets, through actual reductions combined with financial contributions secured through a planning obligation. The effects of which are beneficial, but are not considered to be significant. Supporting information notes that sustainable design and construction will be a key aspect of the proposals, ensuring compliance with regional and local planning policies.

Mitigation

A DCEMP should be secured that includes measures to reduce emissions e.g. management of plant to prevent plant running when not in use.

The s106 will need to be worded to ensure that any required carbon reduction off-set payments are secured.

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

Contaminated Land

Documentation Accompanying the Planning Application: *A Land Contamination Assessment should be submitted as part of the planning application process.*

The site is within an historically industrial area and has been used for industrial purposes and is currently a designated waste site. Based on the site's historical and current use, there is the potential for sources of contamination related to its and the surrounding land uses. To ascertain the likely level of contamination, a Phase 1 ground conditions survey / Land Contamination Assessment should be submitted as the part of a planning application process as described above.

Construction

During construction there is considered to be a low likelihood of fuel leakages / spills from construction vehicles. A CEMP would be implemented to manage potential effects.

In addition there is the risk of exposure to contaminated materials and opening up pathways to underlying substrata. Construction activity could mobilise any contaminants present, exposing them to potential pathways from which human health and controlled waters could be affected by contaminated soils and groundwater. Construction workers may have direct contact with subsoils during construction. According to supporting information, desktop and walkover study has been undertaken on the site, followed by an intrusive site ingestion which highlighted the key geotechnical and geoenvironmental issues. It was found that ground and groundwater contamination was not noted to be an issue on the site.

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. In addition, the supporting information notes that as the proposal involves hard landscaping on the site, this would encapsulate the underlying soils and any potential contamination present

Mitigation

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

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

Daylight, Sunlight and Overshadowing

Documentation Accompanying the Planning Application: *A Daylight, Sunlight and Overshadowing Report should be submitted as part of the planning application process.*

There are a number of sensitive receptors in close proximity to the proposed development site, including student units and businesses.

Construction

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

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

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

Operation

The operation of the proposed development will introduce buildings of up to 14 storeys (on the northern parcel) and up to 12 storeys (on the southern parcel). Due to the proximity of nearby sensitive receptors and the height there is the potential for the proposed development to affect surrounding receptors. Supporting information notes that there may be changes to the duration and quality of daylight and sunlight as well as the incidence and duration of overshadowing experienced by surrounding sensitive receptors on completion of the development, and a potential increased level of light pollution from internal and external lighting schemes of the proposed development.

The supporting information states that the key sensitive receptors that may be impacted by the above are the surrounding student accommodation units to the west, however, the development will be designed to ensure that sufficient daylight and sunlight within new and existing buildings is achieved. The supporting information also notes that considering the emerging urban context of the site, the potential impacts to neighbouring buildings are considered to be within the intention and practical application of the BRE guidelines and can be considered alongside the regeneration aspirations of the area.

With respect to onsite receptors the building will sit within a context where tall buildings are prevalent in close proximity which could impact on sunlight and daylight available to the development. Whilst this might impact on some receptors significant effects are not considered to be likely.

Mitigation

No discipline specific mitigation has been relied upon for the EIA Screening Opinion. Any future planning applications will be subject to an assessment of daylight, sunlight and overshadowing impacts. Taking account of the above it is considered that the environmental impacts in relation to daylight, sunlight and overshadowing would not be so significant to warrant EIA.

Taking account of the above it is considered that the environmental impacts in relation to daylight, sunlight and overshadowing would not be so significant to warrant EIA. It is important to note, that whilst the effects are not considered to be significant in relation to the EIA Regulations, this does not preclude the Council from taking into account the adverse effects (and their acceptability) when determining the planning application.

Biodiversity (including flora and fauna)

Documentation Accompanying the Planning Application: *A Preliminary Ecological Assessment should be submitted as part of the planning application process.*

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

Harp LNR consists of open water, marshes, trees and grassland and the reservoir includes associated waterfowl. Last assessed on 20th March 2019, Brent Reservoir was identified as being in favourable condition, having a good breeding bird assemblage on the open water and fen habitats across the site.

Wealdstone Brook is located approximately 70m from the northern tip of the site (at its closest point), and is designated as a Grade II Site of Importance for Nature Conservation (SINC) of Borough Importance. Last reviewed in 2014, the review of the SINC notes that the habitat could potentially support birds, invertebrates and foraging bats. It notes that it has limited biodiversity interest, but may form a foraging or commuting route for bats and therefore has a moderate level of importance. The review also notes that the brook's associated belt of woodland serves an important wildlife corridor, with dominant tree species of Ash and Sycamore with Hawthorn and Holly.

The supporting information states that some existing structures on the site may provide opportunities for nesting birds and roosting bats but that given the current use these are not considered to be valuable or suitable in that regard. The site does not contain any trees or notable vegetation and so is considered to be of low ecological value.

Construction

Depending on the findings of the Preliminary Ecological Assessment, a range of standard mitigation measures may be required to reduce potential adverse impacts on biodiversity, such as timing of demolition/ construction activities, relocation of bats and controls on lighting.

It is not considered that the construction of the proposed development will have a significant effect on the integrity of statutory or non-statutory nature conservation designations or protected species and the potential for conservation requirements and objectives would not be diminished.

Operation

The supporting information states that once operational, vehicle movements on site and noise and light impacts associated with the proposed development could potentially affect ecological receptors across the wider area in the absence of mitigation, although such receptors are considered to be limited. There is the potential for the proposed development to beneficially contribute to biodiversity of the local area through the implementation of ecological enhancement measures – landscaping, new planting (mainly in the form of landscaped roof gardens), and scope for biodiversity net gains to be delivered compared to the existing situation.

Mitigation

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

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 Flood Risk Assessment will be undertaken as part of the planning application process. A Drainage Strategy will also be undertaken.*

In terms of fluvial flooding, the site is located with Flood Zone 1. It is therefore considered to have a low probability of fluvial flooding. Part of the site (on the southern parcel) is located within Flood Zone 3a (surface water / pluvial flooding).

Construction

Given that the majority of the site is outside Flood Zone 1 (fluvial), and only a small element of the site is within Flood Zone 3a (surface water flooding), in the construction process there is considered to be limited risk to property and people. The development will be expected to take a sequential approach in locating buildings wherever possible away from Flood Zone 3a (surface water), thus reducing the risk of flooding to property on site and reducing flood storage/ impacting on hydrology resulting in increased flooding elsewhere.

Operation

The existing site is hard surfaced, and the supporting statement notes that the proposal will not result in any material change in non-permeable surfaces on site, with proposed development would offer the opportunity to improve the on-site drainage from the current baseline through the implementation of SuDs. The FRA and Drainage Strategy must seek to ensure that the proposed development will not increase flood risk to occupants and off-site.

Mitigation

The development must be located and designed so not to increase risk of flooding. The supporting statement notes that with the implementation of appropriate and established mitigation measures (to be set out in the drainage strategy), this will ensure that no property flooding or increased off site flooding will occur.

Any potential significant effects can be mitigated through mitigations such as planning conditions or a S106 agreement. Implementation and management of surface water run-off should be secured through a planning condition, and a detailed drainage plan must account for 100% of surface water generated from the site and comply with London Plan policy and non-statutory technical standards for SuDs.

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

Human Health

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

Taking into account the above it is considered that the development will not have significant effects that warrant the need for EIA in relation to human health.

Land (land take)

The construction and operation of the proposed development will utilise brownfield land to provide commercial space and student accommodation units. 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. No discipline specific mitigation has been relied upon for the EIA Screening Opinion.

Major accidents and/or disasters

Documentation Accompanying the Planning Application: *None specified within the supporting information*

The supporting information states that the proposed development will be designed in accordance with recognised and accepted best practice in terms of highway design, specification of drainage and current building regulations, to further reduce the susceptibility of the site to major accidents and/or disasters. It also states that whilst 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.

The risk from major accidents and/or disasters (both of existing and new receptors) has also 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.

Noise and Vibration

Documentation Accompanying the Planning Application: *A Noise Impact Assessment should be submitted with the planning application for the proposal.*

The existing roads bordering the site and nearby railway line currently are dominant sources of noise in the area. The noise environment for the existing site consists of HGVs and a commercial plant. Moderate levels of noise from the adjacent light industrial uses is possible, and elevated levels of noise and activity likely during major sporting / cultural events. During the evening / night time hours, noise might also be influenced by the evening leisure economy.

Construction

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

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

Operation

The applicant states that vehicle movements are not expected to materially change. There are likely to be deliveries to residents and commercial properties 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.

Supporting information states that background noise levels within the vicinity of the site are likely to decrease from the existing baseline, as the proposed uses are not associated with significant noise generation and the existing waste uses will cease operation. Some noise may be generated from the operation of any potential mechanical plant and building services, but plant noise emissions will be required to meet local policy requirements and British Standards. Adherence to these values will ensure that new and existing receptors are not adversely affected, and will ensure that there will be no significant effects.

There is the potential for new residents to be affected by adverse noise due to the site's location, with possible moderate levels of noise from adjacent light industrial uses and elevated levels of noise and activity during major sporting / cultural events, in addition to the evening leisure economy. The Noise Assessment should consider how new residents can be protected through the appropriate design of the proposed development. The proposed development can therefore be designed with consideration to the location of the development and the potential noise implications – secured through planning conditions.

No significant effects are therefore anticipated.

Mitigation

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

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

Socio-Economic (including population)

Documentation Accompanying the Planning Application: *The Planning Statement and Statement of Community Involvement might give an indication of current land use and number of jobs within the site and compare this with what is proposed.*

Construction

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

Operation

The proposed development may result in direct and indirect jobs being created from the employment and student accommodation uses, which are likely to be beneficial in the local context. However, these impacts are not likely to be significant.

The development will increase demand for local social infrastructure. Community Infrastructure Levy (CIL) payments will be sought to offset the effects of the development. These financial contributions will mitigate adverse effects, so that significant effects are unlikely.

Mitigation

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

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

Soil (organic matter, erosion, compaction, sealing)

Construction

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

Operation

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

Mitigation

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

Telecommunications

Documentation Accompanying Planning Application: *A TV / Radio Reception Assessment will be required to be submitted as part of the planning application process.*

The height of the taller buildings may impact on the quality of television reception in the near locality. A TV / Radio Reception Assessment was submitted under 20/0587 (located approximately 200m from the site), finding that interference to the reception of TV or radio services was unlikely. As such on the basis of information provided with other sites in the vicinity the impact is not to be significant.

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

Townscape and Visual Impact

Documentation Accompanying the Planning Application: *A Heritage, Townscape and Visual Impact Assessment should accompany the planning application and should identify the extent to which the development impacts on skyline and protected views. The National Stadium is subject to local policy for protection of views to it from various locations across the borough.*

Construction

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

Operation

The height of the proposed development will reach up to 14 storeys. The proposal is therefore of a greater scale than that previously on site. The context within which it sits however currently includes tall buildings in the near vicinity, with the prospect of more, and the site is located within a tall building zone. This is particularly to the south of Fulton Road as set out in the approved masterplan accompanying planning permission 15/5550. NE05 and 18/3381 (subsequently amended by 19/2750) reach heights of 23 storeys, and Euro House (21/2989) which is immediately adjacent to the northern part of this site also reaches a height of 23 storeys. Assessments submitted with these applications have found no significant adverse impacts related to those proposals. As such, the Council considers that although the proposed development could lead to some adverse effects on townscape and views, given the scale of the development and the urban nature of its location, significant effects are not considered likely.

As such it is important to note, that whilst the effects are not considered to be significant in relation to the EIA Regulations, this does not preclude the Council from taking into account the adverse effects (and their acceptability) when determining the planning application.

Mitigation

During construction, ensure the erection and maintenance of hoarding. Design, height and massing to reduce potential for adverse impact.

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 Healthy Streets Transport Assessment / Travel Plan, Construction and Logistics Plan and Delivery and Servicing Plan will accompany the future planning application.*

The site is located within an area with a current public transport accessibility level (PTAL) of 3. As such it has good public transport accessibility and is in an area where the Council will seek to limit on site car parking provision.

Construction

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

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

Operation

A Deliver and Servicing Plan and Refuse Management Plan should be submitted with the future planning application and set out how the site would be serviced when operational, which is consistent with an approach agreed with the local highway authority.

Supporting information notes that the development will be predominately car free. There will be some vehicle movements associated with servicing, pick up and drop off, disability parking and the ground floor employment uses on site. However, given the current use on the site, overall vehicle movements are unlikely to result in any significant effects. As such, operational traffic effects of the proposals are likely to be negligible when placed within the context of the site's existing use. Increased numbers of movements related to deliveries could generate additional traffic over current levels. However, given the scale of the development, these effects are not considered to be significant.

The lack of on-site car parking will mean that suitable controls on residents potential to own/park cars on site and in the vicinity will be expected, this is likely to include restrictions within property leases as well as financial payments towards a local parking permit scheme, which will help to mitigate any adverse effects. Advice will be required from TfL on the impact on bus and underground network capacity.

Mitigation

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

Controls on occupants and financial payments should be sought to offset operational effects.

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

Waste

Documentation Accompanying the Planning Application: A Servicing and Refuse Management Plan should be submitted as part of the planning application. This should provide an analysis of how the development will adequately cater for the storage and collection of domestic and commercial waste during its operation will be sought. A DCEMP will be sought as part of the planning process to deal with demolition and construction waste matters.

Construction

The site will generate waste, principally building materials during the demolition and construction stages. The management of construction waste is covered by the Waste Duty of Care Legislation (2016), issued under section 34 of the Environmental Protection Act 1990. The implementation of standard impact avoidance measures will reduce waste from construction activities, which can be secured through the DCEMP.

Operation

Supporting information notes that waste will be collected and managed in accordance with all relevant legislation and guidance, and it is anticipated that operational waste will mainly

comprise household and recyclable materials. The proposed commercial uses are not considered to give rise to unusual volumes of waste.

Separate solutions should be provided for both the employment and residential elements of the development. The inclusion of suitable waste facilities for residents is covered under part H6 of the Building Regulations, and to ensure this, inclusion of separate facilities for general waste, recycling and organic materials is normally assessed for capacity and suitability as part of the normal planning process with reference to the 2015 Brent Council guidance. Commercial waste is covered under the same legislation as construction waste, above.

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

Mitigation

Adherence to the DCEMP 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. A Servicing and Refuse Management Plan will ensure appropriate disposal of waste during construction phase.

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 DCEMP that will be required as part of the application/ permission process.*

The site has historic industrial use with potential for various compounds that could adversely affect water quality such as hydrocarbons within the ground if disturbed.

Construction

During the construction process there is the potential to affect water quality through accidental pollution events, such as fuel spills and increased sediment within surface water passing through to adjacent watercourses. The implementation of standard impact avoidance measures should be secured through the DCEMP. In addition the potential of contamination on site could result in pathways either above or below ground being created that lead to watercourses, for example through piled foundations. 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 quantity 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 DCEMP should be secured that includes measures to protect against and deal with accidental pollution events. The Contaminated Land Survey 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 Microclimate Assessment will be required to be submitted at planning application stage (required for buildings 30m or more in height)*

Construction

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

Operation

The operation of the proposed development will introduce new buildings onto the site that will be up to 14 storeys in height. Therefore there may be adverse effects on the existing wind conditions. Supporting information notes that through the use of embedded mitigation measures, the tall elements of the proposed development will be designed to ensure that significant effects relating to wind microclimate do not occur, and that comfort criteria are met on and off site in relation to proposed uses.

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

Cumulative Effects

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

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

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

The Council has considered a wide area consisting of the Wembley masterplan area and other development sites adjacent or within the vicinity, particularly those that might generate transport movements along Fulton Road. Three of the applications identified (15/5550 – Wembley Masterplan; 14/4931 – Land Surrounding Wembley Stadium Station; and 21/2989 & 20/2033 – Euro House) as part of the cumulative assessment were subject to Environmental Impact Assessments. The Council has considered the information contained within this assessment related to the individual impacts and also the associated cumulative impacts of the proposals.

It is also noted that the approved schemes at Euro House (20/2033 and 21/2989) cannot be built concurrently, and as such in considering the potential cumulative effects below, the Environmental Statement submitted with 21/2989 has been considered due to this representing the greatest scale of development.

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, no further schemes have been approved within the area. The Access Storage application remains awaiting a decision notice having been subject to a minded to approve decision subject to a S106 and was considered within the cumulative assessment. An application at 3 Olympic Way, which was not considered within the baseline assessment, has been submitted (21/2130) and is awaiting a decision notice having been subject to a minded to approve decision subject to a S106. However, a number of the cumulative schemes have since completed since the baseline assessment for Euro House Environmental Statement was undertaken.

The Environmental Statements submitted with 15/5550 and 14/4931 both notes some potential adverse cumulative effects during construction (townscape, heritage and visual assessment, dust and dirt (in relation to transport and accessibility) and air quality), but these can be mitigated through site management, ensuring plans are coordinated, adequate pollution prevention measures. It is also noted that the development proposed under 14/4931 is nearing completion (due to complete in 22/23) 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 DCEMP.

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

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

Operation

The Environmental Statement submitted with 21/2130 (Euro House) notes a potential moderate adverse impact in relation to overshadowing on the Wealdstone Brook, and a potential adverse impact in relation to climate change (greenhouse gas emissions as a result of 'in use' emissions associated with operational energy consumption and transport related emissions). However, the statement explains that all greenhouse gases are considered to be significant and with the incorporation of mitigation, it is anticipated that emissions will be minimised over time.

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

In relation to plot NE04, this part of the Wembley masterplan is separated from the proposed development by Kelaty House and the proposed development at Euro House and as such significant cumulative impacts in relation to loss of daylight are not anticipated.

In relation to Kelaty House, this comprises student accommodation and the ES notes that with students being transient, these are considered to be of lower sensitivity than occupants within buildings of permanent residency. Minor adverse impacts in terms of daylight are identified in relation to Kelaty House Block B and C but these were not considered to be significant.

In terms of potential negative cumulative impacts in relation to the ES 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 ES associated with 14/4931 notes a potential minor adverse impact when assessing cumulative impact in relation to public transport networks. It is noted that the majority of schemes considered in the cumulative development schedule for this ES 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.