



Our Ref: PC/DJB/HG3320

paula.carney@wyg.com  
5 April 2017

Planning Services  
The London Borough of Brent  
Brent Civic Centre  
Engineers Way  
Wembley HA9 0FJ

F.A.O. David Glover

Dear Sirs

**PLOT E05, WEMBLEY PARK, WEMBLEY, LONDON, HA9**

**TOWN & COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2011 (AS AMENDED 2015)**

**REQUEST FOR A SCREENING OPINION UNDER REGULATION 5 (1)**

**Introduction**

On behalf of our client, Quintain Ltd, we request a Screening Opinion from the London Borough of Brent (LBB) to determine whether proposed development at Plot E05 at Wembley Park HA9 (the Site) should be subject to Environmental Impact Assessment (EIA).

This request for a Screening Opinion is made in accordance with the procedures set out in Part 2, Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended 2015) (the EIA Regulations) and includes the following:

- A plan sufficient to identify the land (enclosed);
- A brief description of the nature and purpose of the development and of its possible effects on the environment;
- Such other information or representations as the person making the request may wish to provide or make.

This letter explains how we have assessed the development proposal and site in accordance with the EIA Regulations and the Planning Practice Guidance<sup>1</sup> (PPG) and explains how we consider that the proposed development would not give rise to significant environmental effects and therefore would not require an EIA.

**Background**

The Site lies within the London Plan Wembley Opportunity Area. Wembley is designated as a Growth Area and is expected to deliver around 11,500 new homes, 10,000 new jobs and 30,000 sqm of new retail floorspace.

---

<sup>1</sup> Department of Communities and Local Government (DCLG) (2014);





On 23 December 2016, planning permission was issued for the 'Wembley Masterplan' (ref: 15/5550) on 15.87 ha of land adjoining Wembley Stadium. This planning permission gave consent for the demolition of existing buildings on site and the provision of up to 420,000 sqm gross of new land use floorspace within a series of buildings, with the maximum quantum as follows:

- A1-A4 Retail : 21,000 sqm gross;
- B1 Commercial : 82,000 sqm gross;
- C1 Hotel : 25,000 sqm gross;
- C3 Residential : 350,000 sqm gross (approximately 4,000 units);
- D1 Education, healthcare and community facilities : 15,000 sqm gross;
- D2 Assembly and leisure : 23,000 sqm gross;
- Sui Generis student accommodation: 90,000 sqm gross.

The development consented also included associated open space (including a new public park) and landscaping; car and coach parking spaces (for residential – up to 55,000 sqm gross - and non-residential – up to 80,000 sqm gross) and cycle storage; pedestrian, cycle and vehicle access (including a new pedestrian access to York House from Royal Route); associated highway works; and associated infrastructure.

The proposals were in outline with the exception of the following element which was provided in full:

- *A multi-storey car park on Plot E05 of 62,558 sqm GEA providing:*
  - *1,816 car parking spaces including blue badge spaces;*
  - *Up to 82 coach parking spaces.*
- Associated infrastructure, landscaping and vehicular access.

Of the 1816 car parking spaces, 1642 were for non-residential purposes and 174 were for residential use.

At the same time, planning permission was granted for the development of the 'VDC Careys' Site, on First Way (ref: 15/5615). This gave consent for the erection of a building, associated hard and soft landscaping and other associated works and access to provide a dual level coach and car parking facility with a capacity of up to 290 coaches for Stadium events.

## **The Site**

The Site that is the subject of this request for a Screening Opinion is Plot E05 within the 'Wembley Masterplan', as defined on the enclosed Site Location Plan. The Site currently comprises part of a larger surface carpark that provides interim car parking for Wembley Stadium in advance of the delivery of permanent facilities.

The Site is bound by other Wembley Masterplan development plots, surface car parking, the Stadium itself and First Way.

## **The Proposed Development**

Quintain has a contractual obligation to Wembley Stadium to provide 2,900 car parking spaces for Stadium Events. These are to be used flexibly to accommodate cars, coaches and minibuses so that the 2,900 spaces may be used for up to 458 coaches, 43 minibuses and 1,200 cars or a combination thereof.

The Wembley Masterplan Planning Permission (ref: 15/5550) included consent for a multi-storey car park on Plot E05 providing:

- 1,816 car parking spaces including blue badge spaces; and
- Up to 82 coach parking spaces.



The VDC/Careys planning permission (ref: 15/5615) is for a coach parking facility for 290 coaches.

Since the granting of the above planning permissions, there have been ongoing positive discussions with Wembley National Stadium Limited, leading to alternative proposals for these sites.

The current amended proposals are for Plot E05 to provide:

- Circa 80 coach parking spaces at ground level;
- Circa 212 DDA spaces across two levels;
- Residential accommodation above (circa 45,000 sqm/500 units including affordable and private accommodation);
- A1-A4 commercial use (B1, A1-A4, D1 and/or D2) circa 175 sqm GEA;
- Open space, landscaping and car parking for residents.

The new VDC Careys proposal is for a multi-storey car and coach park with provision for 290 coaches and 728 vehicles. Further Stadium parking is provided within Plot E03 (adjoining Plot E05) and the Red multi-storey car park to the west of the Stadium. Together these plots meet Quintain's contractual obligations to WNSL.

### **EIA Screening Appraisal**

The proposed development does not fall within the developments identified as Schedule 1 developments in the EIA Regulations that automatically requires an EIA.

However, the proposed development does fall within category 10 (b) of Schedule 2 Urban Development Projects, which include the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas. On the 6th April 2015 new thresholds for Schedule 2 (10 a and b) were issued under the English Town & Country Planning EIA Regulations. For Schedule 10 (b) development that exceed the below thresholds, an EIA could potentially be required.

- The development includes more than 1 hectare of urban development which is not dwelling house development; or
- The development includes more than 150 dwellings; or
- The overall area of the development exceeds 5 hectares.

Furthermore, the National Planning Practice Guidance (PPG) Annex on 'Indicative Thresholds' provides further guidance on identifying if Schedule 2 developments requires an EIA. Such as the, EIA is "*unlikely to be required for the redevelopment of land unless the new development is:*

- *on 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."*

Key issues to consider for development proposals that fall under category 10 (b) of Schedule 2 include the physical scale of such developments, potential increase in traffic, emissions and noise.

The PPG provides further guidance on this issue and advises that EIA is more likely to be required for any development that is located wholly or partly in a sensitive area. The EIA Regulations define sensitive areas as:

- a) land notified under section 28(1) (sites of special scientific interest) of the Wildlife and Countryside Act 1981;*
- b) a National Park within the meaning of the National Parks and Access to the Countryside Act 1949;*
- c) the Broads;*
- d) a property appearing on the World Heritage List kept under article 11(2) of the 1972 UNESCO Convention for the Protection of the World Cultural and Natural Heritage;*



- e) a scheduled monument within the meaning of the Ancient Monuments and Archaeological Areas Act 1979;
- f) an area of outstanding natural beauty designated as such by an order made by Natural England under section 82(1) (areas of outstanding natural beauty) of the Countryside and Rights of Way Act 2000; and
- g) a European site within the meaning of regulation 8 of the Conservation of Habitats and Species Regulations 2010.

This letter provides information to enable LBB to provide a Screening Opinion to determine whether the development should be subject to EIA. Such Screening Opinions are to be made in the context of the guidance of the PPG, which states:

*"Projects which are described in the first column of Schedule 2 but which do not exceed the relevant thresholds, or meet the criteria in the second column of the Schedule, or are not at least partly in a sensitive area may not be Schedule 2 development. Such projects do not usually require further screening or Environmental Impact Assessment".<sup>2</sup>*

Further, the PPG indicates that the proportion of Schedule 2 developments which will require EIA will be very low. It states that *"While it is not possible to formulate criteria or thresholds which will provide a universal test of whether or not an assessment is required, it is possible to offer a broad indication of the type or scale of development which is likely to require an assessment."* and that *"The local planning authority must take account of the selection criteria in Schedule 3 of the Regulations. Not all of the criteria will be relevant in every case. Each case should be considered on its own merits in a balanced way and authorities should retain the evidence to justify their decision."<sup>3</sup>*

### **The Environmental Conditions and Potential Effects (Consideration against Schedule 3 of the EIA Regulations)**

Schedule 3 of the EIA Regulations sets out the 'selection criteria' which must be taken into account in determining if a Schedule 2 development is likely to have significant impacts on the environment and therefore would require EIA.

Potential significant environmental effects must be evaluated in terms of the perceived sensitivity of the receiving environment and must be assessed with regard to the criteria set out in Schedule 3 of the EIA Regulations namely:

- a) **Characteristics of the development** – the size of the development, the accumulation with other developments, use of natural resources, production of waste, pollution and nuisances and the risk of accidents.
- b) **Environmental Sensitivity of the Location** – existing land use, relative abundance, quality and regenerative capacity of natural resources in the area, and the absorption capacity of the natural environment.
- c) **Characteristics of potential impact** – the extent of the impact, the trans-frontier nature of the impact, the magnitude and complexity of the impact, the probability of the impact, the duration, frequency and reversibility of the impact.

We have characterised the baseline environment following the guidance on EIA in the PPG, which has been used as a basis for predicting likely environmental effects. This can be seen in the Table 1 below:

*Table 1: Evaluation of Likely Environmental Effects excluding transport*

<sup>2</sup> PPG, Paragraph 17: <http://planningguidance.planningportal.gov.uk/blog/guidance/environmental-impact-assessment/screening-schedule-2-projects/>

<sup>3</sup> PPG, Paragraph 18: <http://planningguidance.planningportal.gov.uk/blog/guidance/environmental-impact-assessment/screening-schedule-2-projects/>



Topic	Potential Effect	Proposed Approach
Ecology	<p>The site is covered by hardstanding and includes no trees.</p> <p>The opportunities for protected and notable species on site are likely to be limited due to the highly urbanised setting of the site and limited areas of semi-natural habitat it supports.</p> <p>The site does not lie within or is within close proximity to a 'Sensitive Area' as defined under the EIA Regulations.</p>	<p>Ecology surveys were undertaken for the 2015 Masterplan and found nothing of significance. No further survey work is proposed having regard to the above and the characteristics of the site.</p>
Townscape/ Landscape	<p>The massing proposed for E05 has a similar footprint at ground level to the consented massing, with three taller corner points which step up in height to 21 storeys. Views tested through the design development phase show the distant and local views of the Stadium arch would be maintained, that the AAP Strategy of Tall Buildings allows for tall buildings in this location, and that there is a sound townscape rationale for locating a local marker building at the junction of First Way and South Way and in relation to public space also located at this junction. Blocks K and H step up to the greater height of Block I and help to root the marker building to its immediate context. The stepped skyline form of the proposal would contribute positively to the varied profile of development emerging on the horizon and in relation to the Stadium in longer views.</p>	<p>A <b>Townscape Assessment with photomontage visualisations</b> will be undertaken and submitted with the planning application.</p> <p>The assessment will identify and assess any negative and positive effects and significance of change arising from the proposed development.</p>
Noise and Vibration	<p>The site is next to Wembley Stadium and the residential units will be designed so as to achieve an appropriate internal noise environment (especially during Events) as is the case with the rest of the units in the consented Wembley Masterplan.</p> <p>During the construction stage there may be an increase in traffic flows and mechanical plant which could temporarily increase the level of noise and disturbance arising from the site.</p>	<p>Effective site management and best practice procedures during the construction phase of the proposed development can adequately control noise arising during the construction process.</p> <p>All aspects of how measures will be adopted to minimise noise and vibration during the construction stage will be set out within a <b>Construction Method Statement</b> and a <b>Construction Logistics Plan</b>.</p> <p>Additionally, a <b>Noise Impact Assessment</b> will be submitted assessing the internal noise environment of the proposed residential units.</p>



Topic	Potential Effect	Proposed Approach
Air Quality	<p>Emissions of dust and fumes as a result of traffic movements during construction may occur. However, these can be managed with best practice procedures.</p> <p>The level of traffic generated will not significantly increase – as set out below under transport considerations, and no significant impact on air quality is expected.</p>	<p>All aspects of how measures will be adopted to minimise dust during the construction stage will be set out within an <b>Air Quality Assessment</b>, which will also determine any potential impact the proposed development has on the adjacent area. The measures taken to control dust will further be set out within a <b>Construction Method Statement</b> and <b>Construction Logistics Plan</b>.</p> <p>An Air Quality Assessment including an Air Quality Neutral Assessment will be undertaken to assess the environment for future users and occupiers. This will be submitted with the planning application.</p>
Waste	Waste will arise as a result of the construction works as well as during operation of the completed development.	<p>Waste generation will be controlled during construction through best practice measures, (e.g. a <b>Site Waste Management Plan</b> to be secured by a planning condition.)</p> <p>Construction Materials and Resources will be sourced and used following principles set out by BREEAM and in accordance with the Building Regulations and Local Policy. The developer will ensure that sufficient and conveniently accessible storage space has been considered in order to meet LBB waste storage design requirements for commercial developments.</p>
Archaeology and Heritage Assets	<p>There are no Scheduled Ancient Monuments or listed buildings within or adjoining the site.</p> <p>The site has been developed in the past and archaeological watching briefs on development in the surrounding areas have not identified any archaeology of interest.</p> <p>Furthermore, the Site is not within an Archaeological Priority Area nor is the Site within or adjacent to a Conservation Area.</p>	No further archaeological work is proposed.
Contamination and Geology	Historically, the site was previously developed however it is unlikely that there will be elevated levels of contamination present on site.	Given the historical context and use of the Site, the risk of contamination being present in the ground or groundwater below the Site is considered to be low, however a <b>Phase 1 Ground Condition Assessment</b> will be submitted.



Topic	Potential Effect	Proposed Approach
Demolition and Construction	Temporary impacts from the demolition of existing buildings and construction of the new buildings include noise and vibration, dust and light pollution.	Potential impacts can be controlled through effective site management and best practice procedure used on site during the construction process. All aspects of how measures will be adopted to minimise dust, traffic congestion, noise and vibration and light pollution, and other environmental impacts during the construction stage will be set out within a <b>Construction Method Statement</b> and a <b>Construction Logistics Plan</b> .
Flood Risk	The Site lies within Flood Zone 1 on the Environment Agency's Flood Zone map which indicates a 'Low Probability' of flooding from rivers or the sea. Therefore it can be regarded as being outside of flood risk zone.	The planning application will be accompanied by a <b>Flood Risk Assessment (FRA)</b> , which will include details of measures to mitigate flood risk.
Drainage and Water Quality	The site is previously developed. It will be necessary to ensure the site is adequately drained and contributes to an improvement in water quality over current baseline conditions. The drainage design will also need to demonstrate that there is no increase in the risk of flooding elsewhere.	A <b>Drainage Strategy</b> will detail how surface water run-off will be regulated and controlled within the site. The drainage strategy will demonstrate that there will be no adverse impact in terms of water quality or flooding.

## Transport

The proposals for E05 form part of the proposed car and coach parking solution that meets Quintain's obligations to Wembley National Stadium Limited (WNSL) to provide up to 2,900 car parking spaces or up to 458 coaches; 1,200 cars and 43 mini-bus spaces; or a combination thereof on stadium event days.

The consented proposals were addressed in the following planning applications which were submitted and considered in parallel by London Borough of Brent (LBB) and Transport for London (TfL):

- Wembley Park Masterplan (Planning Application Ref: 15/5550); and
- VDC Careys (Planning Application Ref: 15/5615).

Quintain has worked with WNSL and LBB officers to devise an alternative strategy for locating car parking for event day traffic to the east of the stadium that improves the rate of egress for official stadium car parking. The consented and proposed car and coach parking is summarised in Table 2.



Table 2: Consented and Proposed Event Day Coach/Car Parking

	CONSENTED POSITION		CURRENT PROPOSALS	
	E03/E05	VDC Careys	E03/E05	VDC Careys
<b>Event Day Coach Parking</b>	168	290	168	290
<b>Event Day/Commercial Car Parking (Blue MSCP)</b>	1,642	-	212	728
-Standard Bays	1,538		0	728
-Disabled Bays	104		212	0
<b>Cars In Coach Park for Car Max</b>	588	1015	588	1015

The revised strategy would:

- Significantly reduce the capacity of the Blue multi-storey car park capacity to circa 212 DDA cars located above the retained Green Coach Park.
- Create a new multi-storey car park on the VDC Carey site retaining two levels of Coach Parking (to be known as the Pink Car Park).
- This new Pink Car Park would be located east of any South Way event day road closure and therefore be able to egress eastwards towards Great Central Way.
- Coaches would egress eastwards from the VDC Careys site (as in the permitted scheme), however it is proposed that both existing South Way lanes would be eastbound only on event days, feeding directly into Great Central Way.
- The 212 DDA parking spaces would be over two levels and the upper level connected via a footbridge to the Wembley Stadium Concourse providing step free access at this level.
- The DDA spaces would be served by three lifts connecting the Concourse level (level 3 of E05) to the lower DDA level and ground level.
- With reduced number of vehicles in Blue Car Park (now DDA only) and Green Coach Park only one lane of First Way and Fifth Way is required to allow vehicles to travel eastwards. As a result it is proposed to allow First Way, Fifth Way to operate as two way routes on events days.
- Existing residents and business wanting access into the area during the egress period after an event would be able to use Hannah Close, Atlas Road and connect with Fifth Way and First Way, replacing the route that currently exists along South Way.
- By enabling a route back into the estate, access can be provided to the Eastern Lands for residents car parking.
- As a result of the reduction in the amount of car parking on Plot E05 it is possible to propose more residential development on Eastern Lands above the Coach and Car Parking, using a similar development form as the adjoining E03 Canada Court development.

The Plot E05 and VDC Careys applications will have stand-alone Transport Assessment (TA) reports. These reports will refer to a Transport Technical Note (TTN) that considers the combined Event Day and Non-Event day implications of the applications. Each TA will describe the respective developments and site specific issues for event day and non-event day operations.



The TA for Plot E05 will assess the development proposals relative to the Masterplan consent (Ref: 15/5550), while the VDC Careys application will be assessed against the consented scheme (Ref: 15/5615).

The key transport matters are considered to be as follows:

- Car parking: Residential car parking across the Masterplan will be provided within the maximum ratio of 0.4 for the residential units across the estate, with additional operational car parking provided for the commercial development. This will be located within the E05 basement which will also provide access through to the basement of E01 and E02. Access to these basements will be from First Way. The strategy proposed allows for event day access to parking via First Way. Electric vehicle charging points will be provided at a proportion of 20% for residential spaces and 10% for non-residential spaces, plus 20% passive for charging points in the future, and/or for car clubs. Also, one car parking space will be provided for each wheelchair adapted residential unit. An active management regime will be in place to allow a response to the changing needs of occupiers and their requirement for accessible parking. This will involve leasing and re-purchase of previously sold spaces to enable up to 10% of residential car parking serving a plot to be available to blue badge holders over time.
- Car Parking: DDA parking for the Stadium event day use will be provided at 2<sup>nd</sup> and 3<sup>rd</sup> storey levels.
- Car club: Quintain and its consultants are in discussion with a car club operator (ZipCar) in relation to the provision of car club vehicles in publicly accessible locations across Quintain's estate.
- Net traffic effects: Quintain's transport consultant has submitted a Transport Assessment Scoping Report to LBB and TfL and have entered into formal pre-application discussions with them.
- Taxis: Quintain's estate already supports two TfL appointed taxi ranks.
- Walking: the Masterplan provides for a network of connected routes, some with pedestrian priority.
- Cycling: the development will incorporate the adopted minimum cycle parking standards set out in the London Plan (March 2015).
- A site wide Travel Plan, and Framework Delivery and Servicing and Construction Logistics plans will be provided with the forthcoming planning application.

Due to the substantial reduction in parking provided within Plot E05, the impacts on the Masterplan and the surrounding environment will be significantly reduced when compared to the consented position. The transport movements and impacts associated with E05 will be fully assessed within the TA submitted in support of the application which will demonstrate that there will be no adverse impact in terms of traffic movements to and from the site.

## **Conclusion**

Sufficient information has been provided to allow the Council to formally screen the proposed development in accordance with the EIA Regulations and the guidance set out in the PPG.

Based on the assessment of the proposed development, we conclude that the scheme is only of local importance, is not located in, or partly in an environmentally sensitive or vulnerable location and will not have unusually complex and potentially hazardous environmental effects that would trigger the requirement for an EIA, and therefore we conclude that the proposed scheme is not subject to an EIA.

The planning application will be supported by a number of proposed technical studies to fully assess, and provide a basis for mitigating potential environmental effects, if necessary, outside the scope of an EIA, including:



- Air Quality Assessment
- Noise and Vibration Assessment
- Transport Assessment
- Flood Risk Assessment and Drainage Strategy
- Townscape/Views Assessment
- Site Waste Management Plan
- Daylight/sunlight assessment
- Wind assessment
- Utilities Strategy
- Sustainability Assessment
- Energy Strategy
- Ground Condition Assessment
- Construction Logistics Plan

The assessments will consider the proposals against the existing surroundings but also in the context of other committed proposals in the vicinity. The potential effects resulting from the proposed development are therefore proposed to be addressed but outside the scope of an EIA.

In conclusion, the development is not in an environmentally sensitive area and is in a developed area of Wembley. Furthermore, having regard to the character of the site and the surrounding area as well as the nature and scale of the proposed development, it is considered that this proposal would not have a significant effect on the environment.

Drawing on the information provided in this letter and in accordance with the procedures of Part 2, Regulation 5 we kindly request a Screening Opinion within three weeks of receipt of this letter.

In accordance with Regulation 23 we ask that this opinion is placed on the public register, including full justification for LBB's decision.

Where the Council determines that an EIA is required we request to be informed of your reasons for finding that this is an EIA development. Further to this, if an EIA is necessary we would also request that an EIA Scoping Opinion is provided in accordance with Regulation 13 of the EIA Regulations.

We look forward to receiving the Council's formal Screening Opinion shortly. In the interim, if you require any additional information to assist you in adopting your Screening Opinion please do not hesitate to contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read 'P Carney', with a large, sweeping flourish extending from the end of the signature.

**PAULA CARNEY**  
Director  
WYG

Enc: