

Jim Pool
DP9

By E-Mail

15th May 2017

Dear Mr Pool

Re: Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 5 (1) 2011 and Amendment Regulations 2015: Request for EIA Screening Opinion for Access Self Storage, First Way

Thank you for the e-mail in which you attached a letter dated 8th May 2017 from Peter Gardner of Waterman Infrastructure and Environment, which requested that the planning authority adopt a screening opinion of The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011, as amended, in respect of a forthcoming planning application for the proposed redevelopment of the aforementioned site.

The proposal is for the redevelopment of the site currently occupied by Access Self Storage on First Way, covering an area of approximately 0.94 ha. The proposals include demolition of the existing structures on Site and the development of seven buildings arranged along the southern and northern edges of the Site. The buildings would be aligned along an east-west axis to emphasise the importance of Wembley Stadium to the area. The buildings would be staggered in plan to avoid overlooking and to maximise daylight admittance, to the amenity space and residential units neighbouring the Site. Building heights would vary from 8 to 21 storeys and provide up to 434 residential units and up to 7000m² of commercial space (inclusive of 6,000m² re-provision of storage space). The podium consists of the first three floors of the development, this is dedicated to storage facilities for the self-storage business on Site, above this would be residential. The scheme would have one basement level that would provide approximately 174 parking spaces for the residents and commercial premises.

Having considered the proposals as detailed in your letter, Brent Council is of the opinion that the application does not fall within Schedule 1 Development of the Environmental Impact Assessment Regulations 2011 but within Schedule 2 Development, Part 10, Infrastructure Projects (b) – Urban development projects (ii) the development includes more than 150 dwellings. Brent Council has also given consideration to the characteristics of the development, its location and potential impact as set out in Schedule 3 of the Environmental Impact Assessment Regulations 2011 and Planning Practice Guidance. Planning Practice Guidance indicates the types of case in which, an EIA is more likely to be required. It states:

'Environmental Impact Assessment 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.'

EIA is more likely to be required where:

*'(i) the area of the scheme is more than 5 ha; or
(ii) it would provide a total of more than 10,000m² of new commercial floorspace; or
(iii) the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).'*

'Account is also to be taken of the physical scale of such developments, potential increase in traffic, emissions and noise.'

(Reference: National Planning Practice Guidance, Environmental Impact Assessments, Annex: Indicative Screening Threshold Paragraph 57)

Ecology and Nature Conservation

Planning Practice Guidance states, in general, the more environmentally sensitive the location, the lower the threshold will be at which significant effects are likely. Environmentally sensitive locations are considered to comprise:-

- a) Sites of Special Scientific Interest, any consultation areas around them (where these have been notified to the local planning authority under article 10 (u)(ii) of the GPDO), land to which Nature Conservation Orders apply and international conservation sites; and
- b) National Parks, the Broads, Areas of Outstanding Natural Beauty, World Heritage Sites and scheduled monuments.

There are no areas which have an ecological designation (as listed above) on or immediately around the site. The Chiltern Line, located approximately 100m to the south of the site, is a Grade I Site of Importance for Nature Conservation (SINC) and wildlife corridor. This is separated from the site by a business centre and First Way. It will not be directly impacted by the proposal. I am of the view that the proposed development would not cause any significant adverse impacts in this regard to warrant an EIA.

Traffic related impacts-Movement and Safety

The council does not consider that the development will result in significant impacts on highway capacity to warrant an EIA related to this issue. The council accepts that the development will lead to some traffic and air pollution within the vicinity of the development. This impact however, is not significant when taking into account the existing situation and the mitigation proposed in relation to this site, the wider Wembley masterplan area and the management of movement to and from the area generally and the stadium/its environs on event days. A transport assessment submitted with the application will identify impacts and proposed solutions to limit these.

Contamination

It is considered that there is a risk of contamination at the site, due to its historic industrial use. A Preliminary Environment Risk Assessment undertaken by a suitably qualified person will be required alongside the planning application. This is to include information on past and current uses and a Conceptual Site Model of potential pollutants, pathways and receptors. An intrusive site investigation may be required should a plausible pollutant linkage exist. However, on the basis of experience with other application sites this is not considered to be large enough, complex or unusual enough to require an EIA related to this issue.

Archaeology and Architectural Context

The site is not located within an Archaeological Priority Area or Site of Archaeological Importance (as defined on the policies map). It is not located within a conservation area, the nearest is Wembley High Street Conservation Area to the west. There are no listed buildings in close proximity, the Grade II listed Wembley Arena is located approximately 500m to the north-west. Views from the site to the arena are obscured by Wembley Stadium. The site is adjacent to Wembley National Stadium which is subject to policies that seek to protect the views to it and in particular its arch. The development should be in accordance with these policies to protect the views of the stadium.

Overall, the building is unlikely to have significant impacts on the setting of features of historic or cultural importance to warrant an EIA in respect of this issue. An Archaeological desk based assessment, plus the design and access statement and Townscape Assessment will greater analyse existing assets and how the development is consistent with the desire to protect the setting and views of the stadium.

Air Quality and Noise

The site does fall within Brent's Air Quality Management Area. The development is not likely to release significant pollutants or hazardous, toxic or noxious substances into the air and the proposed use is not predicted to have a significant effect upon air quality or traffic generation in the area which would require an EIA related to this issue.

It is anticipated the proposal will result in an increase in noise levels during construction. There will be some noise associated with the occupation of the development related to transport movement and plant. There are some potential noise generators in the surrounding road network and rail lines. Noise generated from stadium events might impact on residents, which will need to be addressed through suitable solutions to the building's fabric. The noise levels however, are not considered to be significant enough to warrant an EIA in respect of this issue. A noise and vibration technical assessment and air quality assessment will identify development impacts and how these can be best addressed to minimise impacts.

Other impacts

The council has assessed other possible impacts (as set out in the attached screening checklist) and effects of the development, and considers that there are none that are significant enough to warrant an EIA.

In conclusion, having assessed the proposals in light of the criteria set out in Annex 'Indicative Screening Threshold' of National Planning Practice Guidance described above and the likely impacts of the proposals, the Local Planning Authority does not consider that the proposal or the mixed use development requires an Environmental Impact Assessment (EIA).

Date of Decision: 15th May 2017

On behalf of the Council of the London Borough of Brent



Paul Lewin
Planning Policy & Projects Manager
Planning and Regeneration
Brent Council

SCREENING CHECKLIST

(taken from Guidance on EIA: Screening, European Commission, June 2001)

Summary of features of project and of its location indicating the need for EIA

| Questions to be Considered For further guidance on factors to be considered see the more detailed questions listed in the Scoping Guidance | Yes / No / ? Briefly describe | Is this likely to result in a significant effect? Yes/No/? – Why? |
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| 1. Will construction, operation or decommissioning of the Project involve actions which will cause physical changes in the locality (topography, land use, changes in waterbodies, etc)? | Yes – the site is in an urban area currently characterised by lower density industrial uses. The proposed development ranges 8 to 21 storeys in height. | No - The form of development is a variant from that which currently exists on the site, however, it is reflective of the scale of emerging development to the north and west of the site. It is not of a scale that physical changes are likely to have significant effects to warrant an EIA. Impacts on micro-climate, townscape and views will be assessed through the planning application. |
| 2. Will construction or operation of the Project use natural resources such as land, water, materials or energy, especially any resources which are non-renewable or in short supply? | Yes – only those typical of construction activities within an urban area, but limited amounts of non-renewables such as oil based fuels. During the operational phase natural resources such as energy and water will be consumed. | No – the construction of this proposed development in this location is not predicted to have a complex or unusual effect and therefore would not have a significant effect on natural resources. |
| 3. Will the Project involve use, storage, transport, handling or production of substances or materials which could be harmful to human health or the environment or raise concerns about actual or perceived risks to human health? | No - the proposed development will not involve the use, storage, transport or production of substances or materials which could be harmful to people or the environment. | No – the development is likely to use construction materials typical of residential and commercial developments. |
| 4. Will the Project produce solid wastes during construction or operation or decommissioning? | Yes –There will be waste produced from construction. | No – mitigation to be agreed prior to works. |
| 5. Will the Project release pollutants or any hazardous, toxic or noxious substances to air? | No –There are no elements of the proposed development that will result in the generation or release of noxious, hazardous or toxic substances to air. | No – It is likely the developers will use the Considerate Constructors scheme consequently there will not be any environmental nuisance in respect to significant release of pollutants or contaminants. |
| 6. Will the Project cause noise and vibration or release of light, heat energy or electromagnetic radiation? | Yes, noise and some vibration may be generated by construction and demolition, but this can be managed by conditions. Occupants of the building may be subject to noise/vibration associated with stadium events. There | No – The effects are not predicted to be significant or unusual. Noise, and light will be generated but these effects are not predicted to be significant in this context and can be reduced by appropriate conditions/mitigation |

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| | will be some noise associated with the occupation of the development related to transport movement and plant. There are some potential noise generators in the surrounding road network and rail lines. Post completion there may be light spill associated with the residential development. | measures. A noise and vibration technical assessment will support the application. |
| 7. Will the Project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea? | Yes – the site is within an industrial, site and therefore there is a risk the development will activate and spread contamination. | No – mitigation to be agreed prior to works. A Preliminary Risk Assessment undertaken by a suitably qualified person will be required. An intrusive site investigation may be required should a pollutant linkage exist. A drainage strategy will deal with mitigating impacts of water run-off from the site. |
| 8. Will there be any risk of accidents during construction or operation of the Project which could affect human health or the environment? | No – the construction and operation of the site do not involve the use of high risk substances or the use of high risk technologies. | No – It is considered that there would be no significant risk of accidents as a result of the end use of the development. |
| 9. Will the Project result in social changes, for example, in demography, traditional lifestyles, employment? | Yes – The proposal will increase introduce residential development into an area which is currently industrial in nature, this will give rise to the need for social infrastructure. | No – The proposed increase in residential population is in the context of wider plans to provide a further 11,500 homes in Wembley Growth Area, with associated infrastructure. This is set out in the Wembley Area Action Plan which has been subject to SEA. The rise in local population from this development is not predicted to be large in relation to the context, and therefore not significant. |
| 10. Are there any other factors which should be considered such as consequential development which could lead to environmental effects or the potential for cumulative impacts with other existing or planned activities in the locality? | Yes – the site is part of the Wembley Growth Area and Opportunity Area. There have been two significant outline planning permissions that deal with Quintain's landownership, plus others related to smaller sites within the area. | No – the approach for Wembley Growth Area is set out in the Core Strategy and Wembley Area Action Plan, both of which have been subject to SEA. Therefore cumulative impacts have been considered at a strategic level. The recent outline permissions considered cumulative impacts and found no significant environmental impacts would result from the developments. |
| 11. Are there any areas on or around the location | Yes – a wildlife corridor and | No – the corridor is |

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| which are protected under international or national or local legislation for their ecological, landscape, cultural or other value, which could be affected by the project? | grade I Site of Importance for Nature Conservation (SINC) is located along the Chiltern railway line, 100m south of the site. | separated from the site by a road and business centre and will not be directly impacted by the proposal. |
| 12. Are there any other areas on or around the location which are important or sensitive for reasons of their ecology e.g. wetlands, watercourses or other waterbodies, the coastal zone, mountains, forests or woodlands, which could be affected by the project? | Yes – Wealdstone Brook is located approximately 500m to the east of the site. | No – the Brook will not be directly impacted by the proposal. A drainage strategy will deal with water run-off from the development to limit volume and not undermine water quality. |
| 13. Are there any areas on or around the location which are used by protected, important or sensitive species of fauna or flora e.g. for breeding, nesting, foraging, resting, overwintering, migration, which could be affected by the project? | No | No |
| 14. Are there any inland, coastal, marine or underground waters on or around the location which could be affected by the project? | No | No |
| 15. Are there any areas or features of high landscape or scenic value on or around the location which could be affected by the project? | Yes – there are protected views to Wembley Stadium. | A key views assessment will be required as part of the planning application. Impact on views is not significant enough to warrant an EIA in relation to this issue. |
| 16. Are there any routes or facilities on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the project? | Yes – First Way is an important route to the National Stadium on event days, both for vehicles and pedestrians. | No – the proposal will not directly impact on First Way in terms of reducing its capacity for movement. |
| 17. Are there any transport routes on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the project? | Yes – First Way experiences congestion, particularly on events days as does the North Circular. | No - In the short term construction traffic and its movement/management may have an impact on the local highway network. The transport assessment and construction management plan will need to consider how this will be addressed, particularly around events days. The wider Wembley masterplan proposes significant changes to car and coach parking in association with the National Stadium and traffic management on event days which the development should seek to complement. |
| 18. Is the project in a location where it is likely to be highly visible to many people? | Yes – the site is visible from the busy First Way road and will be adjacent to the National Stadium pedestrian concourse, used by tens of thousands on event days. | No – New development will not be out of scale in light of other planned developments in the locality and should be more positive aesthetically than the existing utilitarian industrial building. However, |

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| | | as set out above a townscape/views study will be required to allow a full assessment of impacts. |
| 19. Are there any areas or features of historic or cultural importance on or around the location which could be affected by the project? | Yes – the site is not located within a conservation area, the nearest is Wembley High Street Conservation Area to the west. It is also not within an Archaeological Priority Area or Site of Archaeological Importance. There are no listed buildings in close proximity, the Grade II listed Wembley Arena is located approximately 500m to the north-west. Views from the site to the arena are obscured by Wembley Stadium. The site is adjacent to the Stadium, an iconic venue which has policies to protect its setting and visibility of its arch in particular. | No - impacts on the conservation area or listed buildings are not considered significant enough to warrant an EIA due to the distance. Any development should be in accordance with policies that seek to protect the setting of the stadium and longer distance views of its arch. A townscape/views study will be required to allow a full assessment of impacts |
| 20. Is the project located in a previously undeveloped area where there will be loss of greenfield land? | No | No |
| 21. Are there existing land uses on or around the location e.g. homes, gardens, other private property, industry, commerce, recreation, public open space, community facilities, agriculture, forestry, tourism, mining or quarrying which could be affected by the project? | Yes – there are homes and community uses to the north-east. The site is located within an area which is currently industrial in character. | No - the proposal will complement these uses, and the wider regeneration of Wembley. It will need to be demonstrated the development provides a suitable boundary to industrial uses to the east, and will not impact on their continued operation. |
| 22. Are there any plans for future land uses on or around the location which could be affected by the project? | Yes - The site forms part of Wembley Growth Area and is part of the wider regeneration plans for Wembley. | No – the proposal will complement regeneration in the area. |
| 23. Are there any areas on or around the location which are densely populated or built-up, which could be affected by the project? | Yes, Wembley Growth Area will be populated with predominantly higher density housing and some commercial uses. | No – the proposed development is likely to be consistent with policies development plan policies for the area, related to uses, forma and scale. Further potential pressure on physical and social infrastructure will be limited through mechanisms that seek to limit its use, vehicle trip generation or CIL and S106 obligation contributions to overcome impact. These will be assessed through the planning application. |

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| 24. Are there any areas on or around the location which are occupied by sensitive land uses e.g. hospitals, schools, places of worship, community facilities, which could be affected by the project? | No – the immediate context is currently dominated by industrial uses and Wembley Stadium to the west. | No |
| 25. Are there any areas on or around the location which contain important, high quality or scarce resources e.g. groundwater, surface waters, forestry, agriculture, fisheries, tourism, minerals, which could be affected by the project? | No | No |
| 26. Are there any areas on or around the location which are already subject to pollution or environmental damage e.g. where existing legal environmental standards are exceeded, which could be affected by the project? | Yes – the site is within an Air Quality Management Area. | No - The impacts are unlikely to be significant. The impact of the construction phase will be temporary and dealt with via a construction management plan or conditions related to a transport assessment so as not to increase congestion. Impacts on residents of air quality will also be assessed. |
| 27. Is the project location susceptible to earthquakes, subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions e.g. temperature inversions, fogs, severe winds, which could cause the project to present environmental problems? | No | No |

The **Screening Checklist** provides a list of questions to help identify where there is the potential for interactions between a project and its environment.

These questions have been considered for each “Yes” answer in the **Screening Checklist** and the conclusion and the reasons for it noted in the checklist. The questions are designed so that a “Yes” answer will generally point towards the need for EIA and a “No” answer to EIA not being required.

Questions to be Considered

1. Will there be a large change in environmental conditions?
2. Will new features be out-of-scale with the existing environment?
3. Will the effect be unusual in the area or particularly complex?
4. Will the effect extend over a large area?
5. Will there be any potential for transfrontier impact?
6. Will many people be affected?
7. Will many receptors of other types (fauna and flora, businesses, facilities) be affected?
8. Will valuable or scarce features or resources be affected?
9. Is there a risk that environmental standards will be breached?
10. Is there a risk that protected sites, areas, features will be affected?
11. Is there a high probability of the effect occurring?
12. Will the effect continue for a long time?
13. Will the effect be permanent rather than temporary?
14. Will the impact be continuous rather than intermittent?
15. If it is intermittent will it be frequent rather than rare?
16. Will the impact be irreversible?
17. Will it be difficult to avoid, or reduce or repair or compensate for the effect?