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Our Ref: WIE11994-100-R-1-2-3_PG
Date: 8 May 2017

Andrew Neidhardt
Planning and Regeneration
Brent Civic Centre
Engineers Way
Wembley
HA9 0FJ

Dear Andrew

RE: Town and Country Planning (Environmental Impact Assessment) Regulations, 2011: Part 2 Regulation 5 – Request for an Environmental Impact Assessment (EIA) Screening Opinion for the Redevelopment of First Way, Wembley

Waterman Infrastructure & Environment Ltd ('Waterman IE') write on behalf of our client Access Self Storage (hereafter referred to as 'the Applicant'), to formally request a Screening Opinion pursuant to Part 2 Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended 2015¹), in relation to the redevelopment of First Way, Wembley (hereafter referred to as the 'Site').

The Applicant intends to submit a full planning application for the redevelopment of the Site (hereafter referred to as the 'Development'). Whilst the design of the Development is not yet fixed for the purposes of the full planning application, the information provided to Waterman IE and contained herein is considered to be adequate to establish the likely environmental effects of the proposed Development and to advise on the requirements for environmental planning deliverables.

This request for a Screening Opinion should be read in conjunction with the following figures contained within **Annex 1**.

- **Figure 1: Site Location Plan**
- **Figure 2: Site Boundary**

The Site and its Setting

The Site is wholly located within the administrative boundary of the London Borough of Brent (LBB) and falls within the Wembley Area Action Plan (Wembley AAP)². It is approximately 0.94 hectares (ha) and is currently occupied by an 'Access Self-Storage' commercial unit. The Site is bound by First Way to the west, with Wembley Stadium directly beyond First Way; South Way (the B4557) to the south; light industrial units along Second Way to the east and commercial units housing food wholesalers to the north.

With reference to the EIA Regulations, the Site is not within a 'sensitive area' as defined as:

- Sites of Special Scientific Interest (SSSI) or any consultation area around an SSSI;
- Land to which Nature Conservation Orders apply;

¹ HMSO (2015); Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended 2015).

² London Borough Brent (2015) *Wembley Area Action Plan (WAAP)* adopted January 2015.

- International Conservation Sites;
- National Parks;
- Areas of Outstanding Natural Beauty (ANOBs);
- World Heritage Sites (WHS), or;
- Scheduled Monuments.

Proposals

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, an approach that has been found elsewhere in the emerging masterplan 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. 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.

Amenity space would be provided for the residents of the development at podium level. By locating the amenity space at podium level (second floor). This space would be accessed from each of the residential buildings and would provide an opportunity to reinstate much needed green space to the area. The scheme would have one basement level that would provide approximately 174 parking spaces for the residents and commercial premises.

Determining whether an Environmental Impact Assessment is required

To determine whether the Development is an EIA development, reference has to be made to the EIA Regulations. The Development does not meet any of the categories of development in Schedule 1 of the Regulations for which EIA is mandatory. The Development will constitute Schedule 2 development for the purposes of the EIA Regulations if it either (a) meets or exceeds specified thresholds or (b) is within a sensitive area. It is not within a sensitive area, although it falls within one of the categories set out in Schedule 2 of the EIA Regulations, namely Category 10b 'Urban Development Project' where the Development would exceed part '(ii)' from the following relevant criteria:

- “10. (b) *Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centre and multiplex cinemas [where];*
- I. The development includes more than 1 hectare of urban development which is not dwelling/house development; or*
 - II. the development includes more than 150 dwellings; or*
 - III. the overall area of the development exceeds 5 hectares.”*

Schedule 3 of the EIA Regulations sets out that consideration needs to be given to the characteristics of the development, its location and potential effects (including potential increases in traffic, emissions and noise) to determine whether the proposed Development should be subject to formal EIA. A review of the potential environmental effects has been undertaken and this is attached as Annex 2.

Planning Practice Guidance provides advice on 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.’

The existing buildings on Site are the now vacant three storey Access Self Storage facility and associated small car park that covers the whole Site. The Development would include higher buildings than existing and would replace one continuous building with separate blocks and associated open space. The Site has been designated in the Wembley Masterplan Supplementary Planning Document (SPD)³ as suitable for residential buildings up to 21 storeys and suitable for tall buildings in the Wembley AAP. It also states that it is appropriate for mixed use development including leisure, hotels, offices, amenity / open space, residential development and student accommodation. The Wembley AAP was subject to a Sustainability Appraisal. This concluded that overall there are no significant negative social, environmental and economic impacts for any of the site proposals in the Wembley AAP. The Development would replace one urban development with another and high levels of contamination are not known or expected on Site. More detail of changes in scale and land use changes is in Annex 2.

Planning Practice Guidance also states that 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).'

The Site area is substantially less than 5 ha and it would provide less commercial space than existing (i.e. from 15,900m² to 7,000m²). Replacing the current building with a smaller commercial space and 434 residential units would not have a significant urbanising effect on this already developed plot of land.

Following consideration of previous assessments, Schedule 3 of the EIA Regulations and Planning Practice Guidance, it is concluded that the Development would **not** require an EIA. Nevertheless, it is proposed that some assessments and reports covering technical environmental issues would accompany the planning application.

I trust the information provided within this letter and the enclosed Annexes is sufficient for LBB to adopt a Screening Opinion in relation to the Applicant's proposals for the Site.

We look forward to receiving a copy of your Screening Opinion within three weeks of receipt of this letter. Should you require any further information to assist in formulating your Screening Opinion, please do not hesitate to contact me.

Yours sincerely



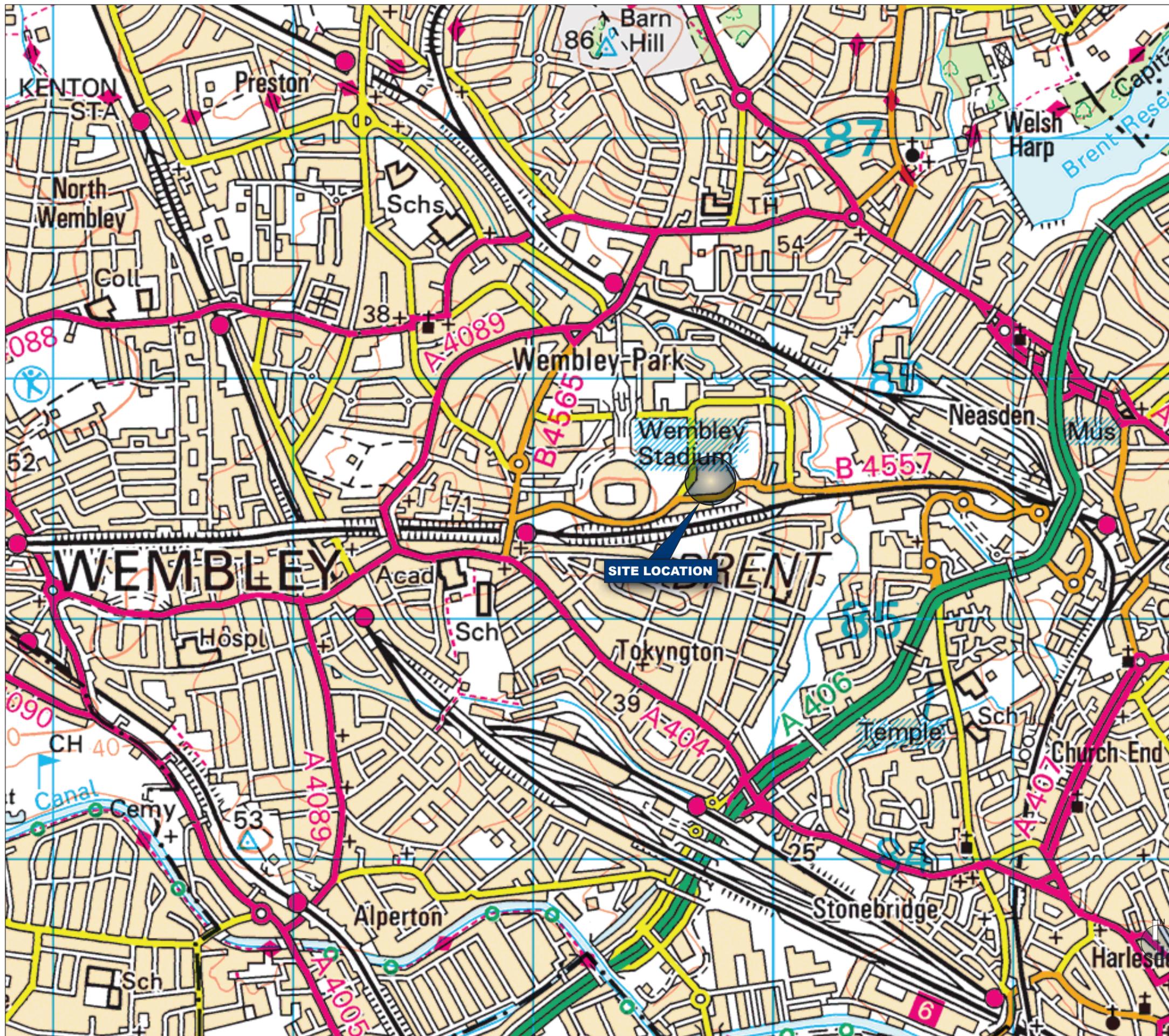
Peter Gardner
Principal Consultant
For and On Behalf of Waterman Infrastructure & Environment Ltd

Enc: Annex 1: Figures
Annex 2: Consideration of Schedule 3 EIA Screening Criteria

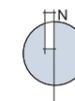
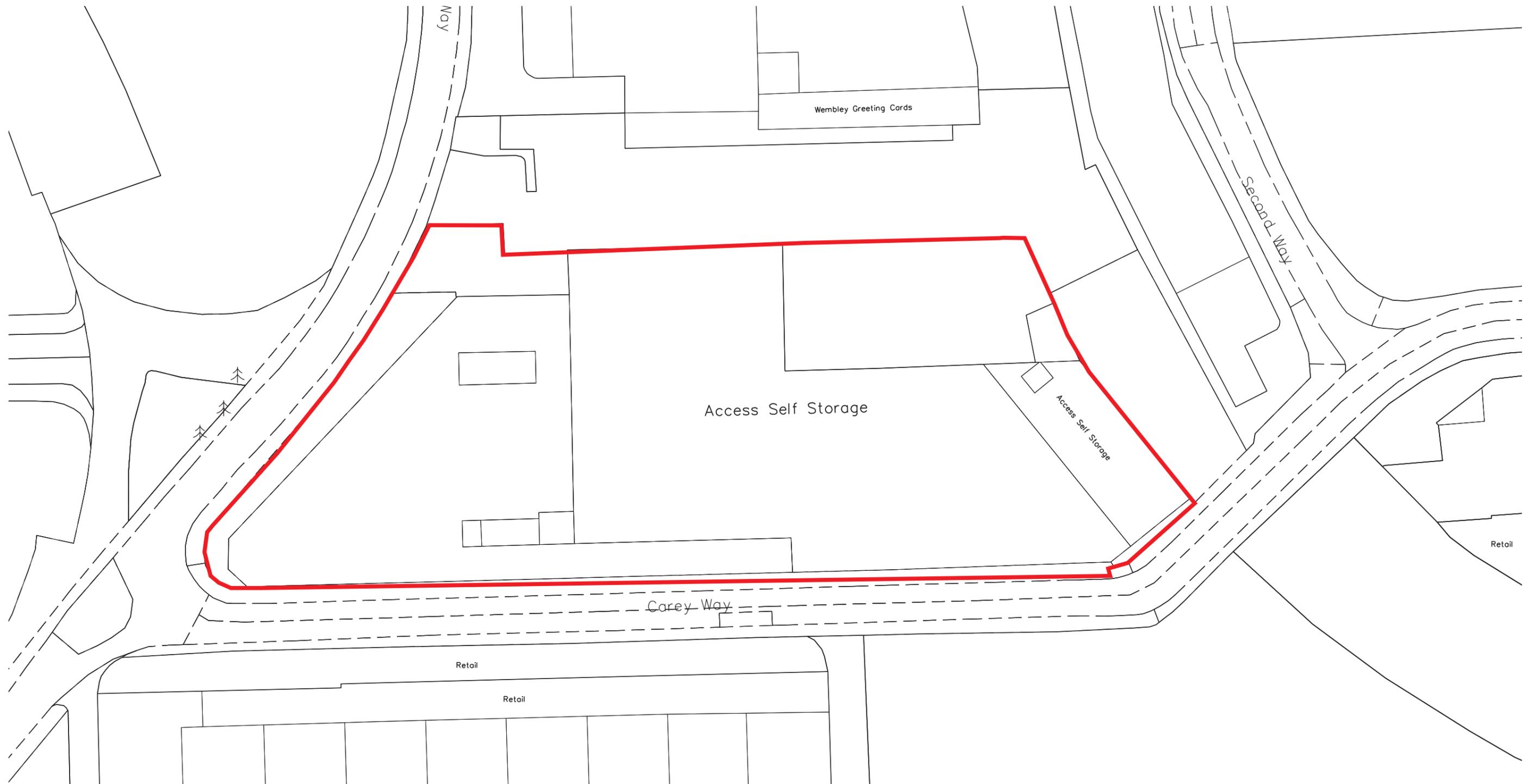
³ Brent Council (2009) *Wembley Masterplan Supplementary Planning Document* (Adopted June 2009)



Annex 1: Figures



Project Details	WIE11994-100: Wembley
Figure Title	Figure 1: Site Location Plan
Figure Ref	WIE11994-100_GR_SL_1A
Date	October 2016
File Location	\\s-inc\wiel\projects\wie11994\100\graphics\sl\issued figures



Project Details	WIE11994-100: Wembley
Figure Title	Figure 2: Site Plan
Figure Ref	WIE11994-100_GR_SL_2A
Date	October 2016
File Location	\\s-incs\wie\projects\wie11994\100\graphics\sl\issued figures

Annex 2: Consideration of Schedule 3 EIA Screening Criteria

1. Characteristics of the Proposed Development

With reference to the selection criteria listed in Schedule 3 of the EIA Regulations, the characteristics of the Development are set out below:

- a) The area of the proposed Development is approximately 0.94 ha. The current proposals include for the demolition of the existing commercial building and construction of up to 434 apartments with approximately 170 parking spaces in a single storey basement and up to 7000m² of commercial space (inclusive of 6,000m² re-provision of storage space).
- b) The potential for cumulative effects is described in **Section 3(m)**.
- c) The Development would not result in the significant loss of resources considered to be scarce, e.g. there is not expected to be a loss of: rare or scarce biodiversity; access to scarce minerals; high quality agricultural land and soils; or high biological and chemical quality waterbodies.

The energy and water efficiency of the Development would be in line with local and national policy and Building Regulations. The use of natural resources would be typical for an urban development project such as that proposed, as will the production and management of waste.

- d) Best practice construction waste management would be employed to minimise the construction waste arisings. The construction works would also be subject to a Construction Environmental Management Plan ('CEMP') which would employ legislative and best practice management to minimise the adverse effects of construction as far as practicably possible. Once operational, sufficient storage facilities would be provided within the Development in line with local planning authority requirements to ensure high levels of recycling are achieved. Refer to **Section 3** of **Annex 2** for further consideration of waste.
- e) Possible noise and air pollution / nuisances arising from building plant and light pollution during both construction and the completed Development would be subject to regulatory controls, to ensure that any adverse pollution / nuisance effects are avoided or reduced to an acceptably low level. The noise and air quality levels resulting from this Development are unlikely to significantly change from the existing situation.
- f) Following completion of the Development, the risk of accidents in relation to hazardous or dangerous substances would be low. During the construction works, the implementation of the aforementioned CEMP would ensure that any hazardous materials on Site, including asbestos, be removed in an appropriate manner and by licenced contractors.

2. Location of Development and Site Context

With reference to the criteria in Schedule 3 of the EIA Regulations, the sensitivity of the geographical area likely to be affected by the Development must be considered. This is discussed below:

- a) The Site is located within the administrative boundary of LBB and is currently occupied by a commercial building used by Access Self-Storage. The Site is designated in the Wembley Masterplan SPD as an area suitable for residential development including buildings of 8-21 storeys in height. The Site is part of the area designated as suitable for tall buildings in the Wembley AAP and appropriate for mixed-use development including leisure, hotels, offices, amenity / open space, residential development and student accommodation.

The Site is bound by a food wholesaler to the north, First Way road and industrial units to the south, industrial units to the east and the B4557 and Wembley Stadium to the west.

The Site is surrounded by retail, commercial, residential and industrial uses to the north, east and west (composing the amenity hub surrounding Wembley Stadium). Residential uses are located to the south beyond the railway line that runs east to west, approximately 100m south of the Site.

Wembley Stadium Train Station, approximately 670m south west (as the crow flies) of the Site boundary, is serviced by Chiltern Railways with trains running from Marylebone towards High Wycombe and Birmingham Snow Hill. Wembley Park Tube Station is 875m (as the crow flies) to the north of the Site and is serviced the London Underground Jubilee and Metropolitan Lines.

The nearest accessible greenspace to the Site is Sherran's Farm Open Space 150m south. The River Brent passes 355m to the east of the Site.

Other than the local amenities provided in the vicinity of the Site and surrounding Wembley Stadium, other urban hubs of Harrow and Brent Cross are easily accessible via public transport.

Wembley is identified as a potential growth area in Brent's Core Strategy⁴ and the Wembley AAP identifies the Site as having potential for redevelopment. The Site, being in such close proximity to Wembley Stadium could potentially be suitable for tall buildings. The Wembley AAP also emphasises importance of strong east-west connections to be aided by massing of proposed buildings. Urban greening is also discussed in the WAAP, required to connect spaces and provide sustainable drainage and amenity / recreational space.

Proposals at the Site have been developed in conjunction with the above allocations as well as in context of the existing and proposed uses of the surrounding land.

- b) The quality and regenerative capacity of natural resources in the area would not be affected significantly given the existing land uses and the scale of the proposed Development.

A desk based review of the Site and its environs reveals that the Site is located in Brent Air Quality Management Area (AQMA) for both PM10 and NO₂.

The Site is not located within, nor does it contain, any scheduled monuments, Archaeological Priority Zones, Conservation Areas or Listed Buildings. The nearest Listed Building is Wembley Arena (Grade II) and is located approximately 600m northwest of the Site. There are also three K6 Telephone Kiosks (Grade II) located approximately 700m northwest to the site.

The Site is not located in a nature reserve nor is it located in a nationally designated area such as a Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC), Special Protection Area (SPA), National Park, Area of Outstanding Natural Beauty (AONB), National Nature Reserve (NNR) or Ramsar Site. There are no statutory ecological designations either at or in close proximity to the Site, the closest statutory ecological designation is Brent Reservoir Site of Special Scientific Interest (SSSI) approximately 1.7km north east of the Site.

⁴ London Borough of Brent (2010) *Local Development Framework: Core Strategy*

3. Characteristics of the Potential Effects

The range of potential environmental effects associated with the Development is considered as follows:

a. Townscape, Heritage and Visual

The Site is not located close to any areas of sensitive townscape character or heritage. There are no World Heritage Sites (WHS) within 1km of the Site and there are no registered parks or gardens in the vicinity of the Site. The Site is not located in or close to a Conservation Area, the nearest Conservation Area to the Site is Wembley High Street Conservation Area approximately 850m to the east of the Site boundary. The Site is not in any Protected Views or Protected Vistas.

The Site is previously developed land and is urban in character. Currently the Site consists of a three storey commercial building in used for storage. The surrounding townscape is currently mixed with predominantly low rise industrial, commercial and residential uses in the immediate surrounding area. There is substantial redevelopment occurring to the north and west surrounding Wembley Stadium, resulting in medium to high rise modern residential led properties surrounding the stadium. Although Wembley Stadium dominates the skyline of the area.

As the buildings on Site have no historic or architectural merit, they would be replaced with new buildings used for storage and residential uses. The proposed new buildings would be of high architectural quality and range in height from 8 storeys to a maximum of 21 storeys to match developments on the other side of Wembley stadium. The new building would provide private amenity space and would improve public access from the east of the Site to Wembley Stadium.

The Development would result in both temporary townscape and visual changes during the construction works and permanent change to the character of the Site on completion of the Development. There would be changes in views from the west and east towards the Site along the B4557 and from the south along First Way. The orientation of the Development with buildings running east to west, parallel to the existing road network would open up a number of views of Wembley Stadium. These changes would be in line with the policies in the Wembley AAP.

The design and nature of the proposals would complement the urban character of the area. Development of the scale and type proposed would be consistent with other developments in the emerging Wembley Masterplan.

In terms of the magnitude of change, this is likely to be assessed as 'high' for local visual and townscape receptors (i.e. close to the Site), but diminishing rapidly with distance. This is due to the presence of intervening buildings and structures, and the fact that the any new tall buildings would be an incremental addition to the view of Wembley Stadium and other developments within the area.

The Development fulfils the criteria suggested in the Wembley AAP; that proposals may include an appropriate tall building (8-21 storeys) located closest to Wembley Stadium then reducing in height towards the east. Tall buildings are proposed for the Site and would not detract from the dominance of Wembley Stadium. The townscape and visual effects of the proposal would therefore be limited, and not significant.

Details of the design, visual and townscape effects of the Development proposals will be assessed fully in the Townscape Assessment and the Design and Access Statement submitted as part of the Planning Application.

b. Transport and Access

Wembley Stadium Train Station is approximately a 655m walk southwest of the Site and Wembley Park Tube Station is 1.1km walk northwest of the Site.

Transport links surrounding the Site are currently poor, with a PTAL rating of 1a (very poor) to 2 (poor).

The Wembley AAP proposes that the B4557 (South Way), which forms the southern boundary of the Site, would have two-way operation reinstated. As a part of these works, junction improvements would be required and the First Way / South Way junction improved. The potential for further improvements would be identified through the Transport Assessment.

The size of the self-storage element of the Development is not considered to substantially change from the existing and is predicted to generate a similar number of trips. Therefore, demand on the road network is unlikely to change significantly from the redevelopment of the self-storage element of the Development (users of the self-storage element are unlikely to utilise public transport because of the nature of the service provided).

The residential element of the Development is proposed to have approximately 170 residential and commercial parking spaces located in within the basement. This is 0.39 spaces per residential unit.

Public access to public transport is currently poor at the Site and the new residential population would also place some additional demand on public transport services in the vicinity. The extent of the changes would be outlined in the Transport Assessment but significant changes are not expected.

c. Noise and Vibration

The surrounding road network would most likely be the principal cause of existing noise at the Development Site, particularly from the B4557 and First Way and the junction where these meet at the south west boundary of the Site. Defra's 'Noise Mapping England' online tool⁵, shows that the noise levels from the surrounding road networks range from 00.0- 64.9 dB(A) during the day, with the majority of the centre of the Site enjoying low noise levels (00.0-54.9 dB(A)) and the areas nearest the road have higher levels (54.9-64.9 dB(A)). There is also railway noise mapped approximately 100m south of the Site. The closest existing residential receptors to the Site are the residents along Victoria Avenue / Park View approximately 200m south of the Site boundary.

During construction, there would likely be a short-term, temporary increase in noise levels as a result of construction plant, equipment and delivery vehicles. These temporary, short term effects would be typical of any construction project and may lead to some localised disturbance to the neighbouring residential and commercial properties. The noise and vibration effects could be effectively managed through the compliance with legislative requirements via the implementation of environmental management control measures detailed within the CEMP.

The size of the self-storage element of the Development is not considered substantially change from the existing and is predicted to generate a similar number of trips. Therefore, vehicle movements are likely to be similar and there is not anticipated to be a significant effect from vehicle noise from the self-storage element of the Development.

⁵ Department for Environment, Food and Rural Affairs (DEFRA) *Noise Mapping England* [Online]. Available from: <http://services.defra.gov.uk/wps/portal/noise> [Accessed 15/09/16]

There would be increased road trips due to the proposed movements from the new residential occupants of the Development, but as the nearest sensitive receptor is 200m from the scheme the noise effect is considered minor.

Although there would be some noise resulting from the operation of mechanical plant and building services, it is anticipated that most of the plant and servicing would be contained within the space allocated for plant (e.g. at roof level). The majority of the plant would therefore be situated away from receptors such that noise would cause a significant disturbance. In addition, standard, tried and tested conditions can be applied to a planning permission that can be relied upon to reduce noise from fixed plant to prescribed levels, in accordance with standard planning policy so that no adverse effects would result.

From review of the Site and the area surrounding the Site, there appears to be no significant vibration generating sources (e.g. LUL and Mainline Rail Lines) proximate to the Site (<25m). Vibration is therefore highly unlikely to give rise to any issues.

The design of the residential elements of the Development would include sufficient levels of sound insulation to ensure appropriate residential amenity. The design and selection of plant (during demolition and construction), associated with the operation of the Development, will take into consideration effects on existing or future residents.

In view of the above, it is considered unlikely that the Development would give rise to significant adverse noise and vibration effects to local receptors. However, a Noise and Vibration Technical Assessment would be submitted with the full planning application to provide an evaluation of prevailing noise levels in demonstrating suitability of the Development's proposed uses against relevant and credited guidance (NPPG⁶; BS 8233:2014⁷ and BCO, 2014⁸) and the requirements of LBB.

d. Air Quality

The whole of the Wembley AAP, including the Site, is an AQMA for PM₁₀ and nitrogen dioxide NO₂. Any proposals for new development would have to comply with London Plan policy 7.14: Improving Air Quality which seeks to minimise increased exposure to existing poor air quality and make provision to address local problems of air quality.

During the demolition and construction works, construction traffic, plant and activities would give rise to some emissions to air, including the potential to generate nuisance dust to neighbouring commercial occupiers and residents. However, these temporary effects would be expected at any construction site and would be minimised through compliance with legislative requirements and the implementation of environmental management control measures detailed within the CEMP. These effects are unlikely to be significant.

The impact of plant emissions from the Development is expected to have an effect of negligible significance.

The introduction of additional car trips associated with the new residents (0.3 – 0.5 car parking spaces/ residential unit) is expected to have an effect and the Applicant would undertake an air quality assessment to support the planning application but as it is in line with the Wembley AAP levels of parking it is not expected to have an effect of more than minor significance.

⁶ Department for Communities and Local Government, 2014. *Noise*. Available from: <http://planningguidance.planningportal.gov.uk/blog/guidance/noise/>

⁷ British Standard Institute (BSI) (2014); BS 8233 'Guidance sound insulation and noise reduction for buildings. BSI

⁸ British Council for Offices (2014); Guide to Specification 2014.

The Applicant and designer would work on maximising the benefits of a localised, decentralised energy system as required by policy 5.5 of the London Plan, to mitigate climate change, including on the opportunities for a wider Wembley network. The scale of the proposed Development is such that the effect it would have on global warming would be immeasurable and therefore unlikely to be significant.

e. Ground Conditions and Contamination

The British Geological Survey (1:50,000 scale)⁹ indicates that the bedrock geology for most of the Site comprises clay, silt and sand belonging to the London Clay Formation. The bedrock geology for the eastern part of the Site is overlain by superficial deposits of Lynch Hill Gravel Member (Sand and Gravel).

Wembley Park evolved as a golf course and housing estate until the Site was chosen for the 1924-25 British Empire Exhibition. The exhibition closed in 1925 and subsequently the Site was developed into a small industrial estate. The 'never stop' railway line did run to the east of the Site on what is now open waste ground. The train was pulled along by a large rotating screw mechanism within a concrete channel and therefore did not require an engine. Therefore, there is not expected to be the typical hydrocarbon contamination associated with railway sidings.

There is potential for effects from contaminated soils on construction workers and surrounding workers / residents. However, construction works and associated procedures would follow current best practice and legislative requirements, and as such, the potential effects of the proposed Development on human health (in the short-term) would not be expected to be significant. A CEMP would be implemented for the duration of the works, and would include damping down to limit dust emissions and the use of PPE by construction workers to reduce the risk of direct contact and dust inhalation with the existing soils. Furthermore, additional care will be taken with works undertaken in close proximity to the canal, in order to reduce the risk of any potential impact on surface waters.

Any piling associated with the proposed Development is likely to terminate in the London Clay, although additional, deeper boreholes would be required to confirm this. As a result, the redevelopment of the Site is considered unlikely to give rise to significant effects on groundwater flow or quality.

Further geotechnical and contamination investigations would be required at the design stage in order to clarify piling depth and method; determine the presence of asbestos; and classify the soils to be excavated / disposed of as hazardous or non-hazardous waste.

Despite the above, in line with the National Planning Policy Framework (NPPF), a Phase 1 Preliminary Environmental Risk Assessment (PERA) will be carried out and will be submitted with the planning application to set out the potential contamination risks posed to various receptors.

f. Archaeology and Heritage

The Site is not in an Archaeological Priority Area. Additionally, there are no Scheduled Monuments within or surrounding the Site. The nearest Conservation Area to the Site is Wembley High Street Conservation Area approximately 850m to the east of the Site boundary. The nearest Listed Building is Wembley Arena (Grade II) and is located approximately 600m northwest of the site. There are also three K6 Telephone Kiosks (Grade II) located approximately 700m northwest of the Site.

⁹ British Geological Survey (2015). *Geology of Britain Viewer*. [Online] Available from: <http://mapapps.bgs.ac.uk/geologyofbritain/home.html> [Accessed: 16.09.16]

The potential archaeological survival from different time periods across the Site may be varied due to past developments. Although some intrusive work would be carried out as part of the scheme of demolition and construction, due to the distance of the Site from any designated areas of archaeological interest it is not considered that the Development would have a significant environmental effect on the heritage of the Site or the surrounding area.

An Archaeological Desk-Based Assessment will be carried out and submitted alongside the planning application to examine any archaeological potential of the Site in line with the policy requirements of the National Planning Policy Framework (NPPF), the London Plan and the Local Plan.

g. Water Resources and Flood Risk

The nearest water course, the River Brent, is located approximately 355m east of the Site. Significant effects from flooding of rivers and the sea is highly unlikely as the Site is wholly located in Flood Zone 1. A Flood Risk Assessment (FRA) would not be required as the Site is less than 1 hectare in size and located in Flood Zone 1.

Given the fact that the scheme would not increase the amount of impermeable areas on the Site, it is considered likely that the Development would have no tangible effect on surrounding infrastructure. The proposal includes a raised open space that would provide attenuation and opportunities for vegetation.

A Drainage Strategy would be required to provide information on surface water runoff rates and the proposed Sustainable Drainage System, to ensure compliance with LBB and National Planning Policy.

h. Microclimate - Daylight, Sunlight and Overshadowing

The closest existing residential receptors to the Site would be those residents along Victoria Avenue / Park View approximately 200m south of the Site boundary. Similarly, the nearest open space is 250 south of the Site. It is therefore unlikely that the Development would have a significant overshadowing effect on these.

Effects in relation to daylight and sunlight would vary throughout the demolition and construction phase. However, these would be less than the effects of the completed Development and would only be temporary.

The scheme has been designed with regard to its relationships with the surrounding properties in both the interim and future conditions as set out within the Wembley AAP. The Development is designed to avoid breaching BRE guidance wherever possible. This being the case, it is unlikely that the Development would give rise to any significant daylight, sunlight or internal overshadowing impacts. The orientation and layout of the proposed residential units of the Development considers the requirements to achieve acceptable levels of internal daylight and sunlight levels, as far as practically possible.

An Internal Daylight and Sunlight Assessment would be submitted alongside the planning application.

i. Microclimate - Wind

The current proposed layout includes for seven buildings arranged along the southern and northern edges of the Site. Building heights would vary from 8 to 21 storeys. The Development has been designed with regard to microclimate in term of massing, articulation and landscape. The suitability of the local wind environment has considered the comfort levels required for pedestrian activities that would occur in and around the Site. In particular, consideration has been given to areas of public realm, pedestrian routes, and the design / provision of balconies to the proposed residential units.

As a result, it is not anticipated that strong downdraughts or other adverse wind microclimate effects would result. The scale and massing of the proposed Development is therefore unlikely to generate any significant wind microclimate effects within or around the Site. A Wind Report will be submitted as part of the Planning Application.

j. Waste

The construction and operation of the proposed Development would inevitably generate waste. However, a CEMP including site waste management would be prepared to be implemented by the contractor during the construction works. This would ensure that waste is managed in line with relevant legislation and best practise to minimise waste generation and maximise reuse and recycling.

In terms of operational waste, as part of the design process and in line with local and national requirements, the proposed Development would provide sufficient space for the storage of segregated general and recyclable waste. In addition, the servicing of the proposed Development would ensure that adequate waste collection and disposal can occur as necessary.

In light of the above, construction and operational waste generation is not considered to give rise to significant environmental effects. Furthermore, the Development is not likely to give rise to particularly hazardous waste materials (see **e. Ground Conditions and Contamination**).

k. Socio-Economics

Construction and operation of the Development would provide some temporary and permanent local employment opportunities, as would be expected for a project of this type. This is likely to be temporary and short term and would not significantly affect the local economy.

The residential units proposed as part of the Development would result in a new residential population in the area. This new residential population would result in additional household spending in the local area, supporting employment in local shops, services and other amenities. Again, it is anticipated that these effects would be relatively small and would be unlikely to be noticeable in the context of existing levels of commercial, industrial and residential activity in the surrounding area.

The new residential population would also place some additional demand on community services such as primary health care and primary and secondary school places. It is anticipated however, that the population, some of which are likely to already be resident in the Borough, could be accommodated by existing services or would be dealt with by way of financial contributions and a legal agreement for the planning permission. As such, the above socio-economic effects would not be expected to be significant.

l. Ecology

The Site is not part of an area covered by European or National Statutory designation, such as a Special Area of Conservation (SAC) or a Site of Special Scientific Interest (SSSI). Brent Reservoir approximately 1.7km north east of the Site, is a Site of Metropolitan Importance (SMI), Local Nature Reserve (LNR) and Site of Special Scientific Interest (SSSI). Fryent Country Park approximately 1.6km north of the Site is an SMI and LNR. The Grand Union Canal approx. 1.9km to the south of the Site is a Site of Metropolitan Importance. There are no locally designated sites (Sites of Borough Importance / Sites of Local Importance) within the immediate vicinity of the Site or with any connections to the Site, being separated by major infrastructure and urban development.

Currently, the Site is dominated with hardstanding and the existing building and servicing yard, is considered to be of low ecological value. Due to these factors, it is likely that the Development would result in no effects of significance upon surrounding habitats, protected species and wildlife in general.

Nevertheless, an 'Extended' Phase 1 Habitat Survey will be undertaken and presented as a Preliminary Ecological Appraisal to provide a confirmation of the above. Furthermore, recommendations of the Phase 1 Habitat Survey would likely include enhancements to biodiversity. Therefore, the Development is likely to increase its ecological value and provide net gains to biodiversity. For example, bat boxes, nesting boxes for birds and green and brown roofs could be part of the development plans. While soft landscaping could include native and wildlife friendly plant species.

m. Cumulative Effects

For the reasons set out in the main body of this letter and in this Annex, it is considered that the Development would **not** be captured by the EIA Regulations. Accordingly, the Development would unlikely lead to significant environmental effects. In addition, effect interactions in relation to the Development itself and with any other reasonably foreseeable schemes in the vicinity of the Site would be unlikely.

Annex 3: Schedule of Technical Documents to be submitted

The following documents would feed into the design of the Development and would be submitted alongside the planning application.

- Townscape Assessment;
- Transport Assessment;
- Noise and Vibration Technical Assessment;
- Air Quality Assessment;
- Preliminary Environmental Risk Assessment;
- Archaeological Desk Based Assessment;
- Drainage Strategy;
- Internal Daylight and Sunlight Assessment;
- Wind Report; and
- Phase 1 Habitat Survey.