Date: 26 July 2017  
Our ref: 15189/MH/SF/14354082v7

Dear Sir/Madam

The Town and County Planning (Environmental Impact Assessment) Regulations 2017 – Request for an EIA Screening Opinion

Cannon Industrial Estate, First Way, Wembley – London Borough of Brent

On behalf of our client, Red Vale Property Developments No2 Ltd, we request that the Council provides a formal screening opinion to confirm the requirement for an Environmental Impact Assessment ("EIA") in respect of the proposed development of a new University Degrees in Football, Sport and Events Industries ("UCFB") higher educational campus including lecture space, staff offices, office start up space and student accommodation at Cannon Industrial Estate, First Way, Wembley. This request is made in pursuance of Regulation 6 ("the Regulations") of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

To enable your consideration of this issue, we set out below the following information:-

1. Description of the site and its surroundings and an identification of the environmental sensitivity of the areas likely to be affected.

2. Description of the proposed development including its physical characteristics.

3. Review of the requirement for an EIA with reference to a description of any likely significant effects and any measures envisaged to avoid or prevent adverse effects (where relevant).

Item 3 is dealt with by reference to a preliminary review of the site and its surroundings, initial investigations and assessment and a consideration of the issues set out in the EIA Regulations which take into account recent case law.

In summary we consider that the proposed development will not require an EIA. We outline below the analysis undertaken to reach this conclusion.

1. Description of the site and its surroundings

Site Surroundings

The proposed development is located in Wembley, North West London and is approximately 0.69ha in size. The development plot is known as the Cannon Industrial Estate and is bounded by the access road First Way.
to the west, disused and dilapidated industrial warehousing to the north (including Kelaty House – see ‘forthcoming development section’ below), a waste transfer facility to the east and industrial and retail warehousing to the south. Running along the other side of First Way road to the west there is land which was previously used as surface car parking for Wembley Stadium, which has now seen enabling works start on new development (see below).

Further beyond to the south of the site includes additional warehouse units and car parking associated with Wembley Stadium (which is 250m to the south west) and approximately 500m to the east of the site is the River Brent.

The site can be accessed via First Way which leads onto the North Circular Road (A406). The A406 provides links to the M1, M25 and M40. The development site also has links to the A40 Western Avenue providing a route into Central London. The nearest London Underground station, Wembley Park, is approximately 650m to the North West of the development site and provides services from Chesham and Stanmore to Kings Cross London. Wembley Stadium Station which runs a national rail service is also located approximately 1km to the south of the site, with services via Chiltern Railways to High Wycombe. The development site is located approximately 55m from the nearest bus stop, with services to Kingsbury and Hanwell (bus numbers 92 and 206).

The surrounding area is of a largely industrial character, comprising warehouses to the east and south of the development site. To the north of the site includes further warehousing units along Fulton Road, four storey residential flats along North End Road (approximately 350m), a railway line and Wealdstone Brook (both approximately 400m).

**The Site**

The site comprises two industrial warehouses (broken up into five broad units) that are currently part occupied and there are three trees and some grass banking to the west of the boundary. The units consist of a range of double height independent brick buildings with metal cladding. From 1925 to 2016 the site has been predominantly used for the storage and distribution of products, most recently the units were occupied by commercial companies as retail warehousing for natural wood furniture and other wood products.

The five warehouse/industrial units have an approximate total floor area of around 3,960sqm and parking for 35 vehicles, although there is a significant amount of informal parking available (c. 30 additional spaces).

A site location plan is located at Appendix 1.

**Sensitive Receptors**

All ecological designations within a 5km radius have been reviewed. The site is located approximately 1.65km from the Brent Reservoir Welsh Harp Site of Special Scientific Interest (‘SSSI’) and a Local Nature Reserve (‘LNR’) located to the north east of the development site. The SSSI was designated in 2005 due to its important role as a breeding site for wildfowl. The development site is also located approximately 1.9km to the south of the Fryent Country Park Site of Importance for Nature Conservation (‘SINC’) and 2km from the Masons Field LNR. The Fryent Country Park covers 103 hectares of the Middlesex countryside and includes 800 species of wildlife with 80 recorded birds, 21 butterflies and 500 wild flowers. Masons Field is a 2.78 hectare field in the north west of Fryent Country Park that was designated a LNR in 2013 for the same reasons.

The site is located within Flood Zone 1. There are no scheduled monuments, conservation areas or listed buildings within the site. Wembley Arena located approximately 465m to the west of the development site.
and three telephone kiosks, located approximately 660m to the west of the site are both Grade II listed. The development site is located within the Brent Air Quality Management Area (‘AQMA’).

**Site Surroundings - Forthcoming Development**

The surrounding area to the west of the site, forms part of the Wembley Development Area. This includes the scheme on land to the north for the ‘Kelaty House’ development, and redevelopment of the surrounding area to the west by Quintain with a hybrid planning permission (application ref. 15/5550) delivering in excess of 4,000 residential units in addition to retail, office, hotel & student accommodation.

Immediately adjacent to the site to the north comprises a disused warehouse known as Kelaty House, where planning permission was granted in August 2012 for a comprehensive redevelopment of up 5 buildings from 4 to 13 storeys (application ref. 12/1293, as amended by 16/1435) for a mix of uses including hotel/serviced apartments (Use Class C1), student accommodation and flexible business/retail/community/leisure uses. Based on information available to us, it is understood that commencement of construction is likely to be later in 2017.

Immediately to the west and south west of the proposed development, across the road of First Way are residential-led Plots E03, NEO4 and NEO5 of the Quintain development. In accordance with the approved maximum heights parameter plan, plots E03 and NEO4, located to the immediate west of the site, have an approved maximum height of 73m AOD whilst Plot NEO5, located to the south west of the site, has an approved height of 79m AOD.

A reserved matters application was approved in May 2017 (application ref. 17/0016) for the construction of a building ranging from 12 to 26 storeys in height, providing 743 residential units at plot E03 (also known as Canada Court) which is the plot immediately to the west of the site. The application also includes 569 sqm (GEA) of commercial space for either B1 (Business) and/or D1 (Community) use, an energy centre and 91 coach parking spaces. Enabling works have started, thus taking the previous surface car parking out of use.

2. Description of the proposed development

The development will be brought forward for the University College of Football Business (UCFB); a Higher Education institution offering undergraduate and postgraduate courses in football, business, sports and leisure. The proposed development comprises a higher educational campus within four linked blocks for the following:

- Teaching/academic space including an auditorium/lecture theatre, seminar rooms, learning resource centre;
- Office space to house finance, marketing, student services, welfare etc.;
- Office space for start-up units/incubator space associated with the emerging knowledge base from UCFB Wembley;
- Student accommodation for up to 678 units in a mixture of studios to three bedroom;
- Ancillary spaces which are likely to include a student learning centre, gym, laundries, outdoor amenity space, and a coffee bar.

It is currently proposed that the commercial and college floorspace combined (Use Classes B1/C2) will total up to 4,800sqm (GIA).

Three external public courtyards will also be provided as part of the proposed development, in the centre and to the south of the site.
The design of the scheme is currently proposed to be no more than 11 storeys (36m AOD). The western block is proposed to be the tallest element, with the further four (linked) blocks running east stepping down in height down to 6 storeys. The main entrance to the site is proposed on the west elevation and will have a distinct glazed office and educational entrance. The entrance for the student accommodation will be on the north elevation. The external cladding for the rest of the blocks is still being finalised.

The primary vehicular and pedestrian access to the site will remain from First Way located to the west of the site. The development is proposed to be promoted as a car free scheme with the exception of five car parking bays to the north elevation, towards the eastern end of the site, for visitor/disabled parking associated with all proposed land uses.

A site plan is provided at Appendix 1.

3. Requirement for EIA

The development falls below the EIA Regulations thresholds within Schedule 2 (Section 10(b)), as an "urban development project" with a site area of less than 1 hectare of development which is not dwelling house development. However, it is noted that the thresholds for Section 10(b) of the Regulations determine that an "urban development project" also apply to residential development of over 150 dwellings. Whilst student accommodation is not considered to be residential development by definition, it is considered that this kind of accommodation shares many similar elements and potential for significant impacts on the environment. For Schedule 2 developments and any considered to be potentially sensitive, the Regulations require that an EIA be undertaken where "the development is likely to have significant effects on the environment by virtue of factors such as its nature, size or location". Given the above, the below does provide a review of potential significant effects.

In determining whether the development is likely to give rise to significant environmental effects, reference should be made to Schedule 3 of the Regulations. This identifies three categories of criteria:

1. Characteristics of the development (such as size, cumulative effects, use of natural resources, production of waste, pollution and nuisances, risk of accidents and risk to human health).
2. Location of the development (by reference to the environmental sensitivity of the area).
3. Characteristics of the potential impact (having regard in particular to the extent of the impact, its transfrontier nature, magnitude and complexity, probability and duration, frequency and reversibility and the possibility of effectively reducing the impact).

In addition, further guidance is provided by the Planning Practice Guidance which confirms that the focus should be on those effects which are significant. It provides as an Annex a series of Indicative Screening Thresholds which includes indicative criteria to assist in determining whether significant effects are likely, recognising that the location and sensitivity of an asset are important considerations.

The Practice Guidance states that only a very small proportion of Schedule 2 development will require an assessment (ID: 4-018-20140306).

The indicative criteria and threshold for projects within category 10(b) states that an 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". Specifically, the guidance notes that EIA is more likely for sites which have not previously been intensively developed, for sites greater than 5 hectares, where more than 10,000sqm of commercial floorspace will be provided or where there will be significant urbanising effects (e.g. over 1,000 dwellings). The Practice Guidance identifies the physical scale of such developments,
potential increase in traffic, emissions and noise as key issues to consider in relation to such projects (ID: 4-057-20140306).

We consider below each of the relevant criteria specified in Schedule 3 of the EIA Regulations in turn.

Development Characteristics:

The proposals will lead to the development of a site that has been occupied by warehousing and distribution/storage uses, for a scheme comprising an education-led mixed-use development. Although the historic use of the surrounding site has been similar industrial warehousing and distribution units, the approved Quintain masterplan and associated development currently under construction are considered to be changing the surrounding character of the area to that of a residential-led, mixed use area. This development would be in keeping with these uses and with planning policy designation contained within the Wembley Area Action Plan (2015).

The built form is proposed to be greater than the buildings currently on site; covering a bigger footprint and greater in scale. This will lead to the site being more intensively used than currently, as students and those living within the student housing access the site throughout the day. In light of the emerging development on adjacent plots (which are taller than the 11 storeys), the heights of the proposed development are not considered to be so materially different to give rise to significant effects.

It falls under the thresholds where EIA is considered more likely as specified in the EIA Regulations and Planning Practice Guidance, and cannot be considered likely to have a significant urbanising effect on a site which was not previously intensively developed. On balance, the development is likely to give rise to similar or lessened effects on the environment, which are unlikely to give rise to a need for EIA.

The current level of car parking at c. 35 spaces (plus approximately 30 informal spaces) will drop considerably, given the car-free nature of the proposed development (which the exception of no visitor/disabled parking spaces). As a result, the proposed impact in respect of highways impact is likely to reduce significantly, and noise and air pollution impacts are likely to decrease from current levels in the context of reduced car use.

With regard to ground conditions and contamination, the proposed development is unlikely to give rise to an unusual risk of accidents, use of natural resources or unusual or significant pollution or nuisance.

In summary, the characteristics of the proposed development are not considered to give rise to any unusual or significant effects either by themselves or in cumulative with other schemes nearby that would give rise to a need for EIA.

Any effects during the construction period will be minimised through best practice measures and agreed with the local authority.

Environmentally Sensitive Location

The site is not in a ‘sensitive area’ as defined by Regulation 2 of the EIA Regulations. The entire site is within Flood Zone 1 and there are no other statutory designations of local, national or international importance.

The site is within the Brent AQMA, which is designated for road transport reasons for nitrogen dioxide pollution and particulate matter. It is not considered that this site specifically generates air quality concerns beyond those identified across the wider AQMA. There are no ecological designations within 1km of the site; The Brent Reservoir Welsh Harp SSSI and LNR are located approximately 1.65km to the north east of the site, the Fryent Country Park SINC and LNR, and the Masons Field LNR are located approximately 2km to the north.
There are no Scheduled Monuments or Listed Buildings located within the site boundary and the site does not lie within a Conservation Area. When built, with the surrounding development under construction, the scheme is not likely to be visible to nearby listed buildings, and the scheme is not excessive in scale, therefore having minimal visual impact on the surrounding areas.

The development will not give rise to significant environmental effects requiring assessment in relation to any environmentally sensitive locations or other statutory or non-statutory designated areas.

Environmental Effects

This section considers the characteristics of the potential impacts from the proposed development, drawing from and informed by initial assessment work and analysis. Where mitigation measures are relevant to the Council’s consideration of these issues, then these are specified.

Townscape and Visual Impact

We have undertaken a desk-top analysis of townscape and visual policy, considered the potential visibility of the development proposal and reviewed the potential townscape and visual receptors in the site and surrounding area. This review has found that the townscape of the site and its immediate surroundings comprises a robust industrial townscape of low or very low value. Parts of the surrounding area are vacant, have been cleared or are under redevelopment. There are no listed buildings or conservation areas in the vicinity.

The site and surroundings are not sensitive to change associated with the proposed development, indeed regeneration is being actively promoted through the Wembley Area Action Plan (WAAP). There are no sensitive townscape receptors on the site or within the surrounding area. Wembley Stadium is an iconic element within the townscape and consideration has been given to the potential for an effect on views of the landmark role of the arch and stadium roof. This has been tested through the preparation of visualisations from a number of locations including locations identified in the WAAP (Jubilee Line and Welsh Harp reservoir). These visualisations demonstrate that the proposal would be well below the level of the arch/stadium roof in views and will not screen the stadium or challenge its presence within the wider townscape, particularly when considered in the context of surrounding permitted development of heights in excess of what is proposed here.

In view of the above there is not considered to be the potential for any significant townscape or visual effects to arise from the proposed development.

Transport

Pedestrian, cycle and vehicular access to Cannon Industrial Estate is currently from First Way in the south western corner of the site. This access will be retained to serve the proposed development, with car and cycle parking and servicing space provided within the site. The entrance to the academic facilities and office space will be located on the First Way frontage with the entrance to the student accommodation located to the north of the site, which will be reached via a new pedestrian/cycle route along the northern boundary of the site with the Kelaty House development.

The proposed development will be largely car free, aside from approximately 4 disabled, visitor and operational parking spaces. Consequently, the initial trip generation forecasts indicate that there will be a net reduction in vehicle trips (the site currently has 35 parking spaces plus informal spaces) as a result of the proposed development. Thus, the development is not expected to have a material impact on the surrounding road network.
The majority of trips generated by the development are expected to be short distance walking trips to and from UCFB's existing facilities in Wembley Stadium, other local halls of residence and other local amenities. The existing pedestrian network in the local area is expected to have adequate capacity to accommodate this level of activity, although consideration will need to be given to the need for and location of crossing facilities on First Way to provide a safe pedestrian route. Some longer distance trips will be made by public transport, however, the development is well served with several local bus services stopping on First Way and Wembley Park London Underground Station less than 10 minutes' walk away. For these reasons it is not considered that any effects requiring EIA are likely.

It is noted that a managed strategy will be required for drop-offs at the start and end of the academic year for students living in the accommodation.

Initial consultation has been carried out with LB Brent Highways officers through the formal pre-app process and a transport scoping note has subsequently been submitted, which sets out the proposed scope of assessment and content of the transport-related document(s) that will be submitted as part of the planning application.

**Socio-Economic and Community Effects**

A review of the potential for significant effects associated with the new educational facility, provision of student accommodation, and employment as a result of the development has been undertaken.

The development of a higher education institution managed by the UCFB would provide opportunities to young people in LBB to study for undergraduate and postgraduate level qualifications in football, business, sports and leisure. The facility would therefore increase the number of higher education places in LBB and would contribute to increasing the levels of educational attainment for young people in vocational courses linked to sports and leisure. The provision of start-up/incubator office space close to the UCFB and Wembley Stadium would encourage business start-ups and provide opportunities for students and graduates of the UCFB.

The development of up to 678 units for student accommodation would represent a significant increase in the supply of student accommodation in LBB. The units would be of a mix of sizes (from studio to three bedroom) and would reduce barriers to accessing housing for students in LBB. Providing purpose built accommodation at the site will allow students to live close to the educational facility and within LBB, increasing expenditure at local shops and services.

The proposed development would generate a range of direct and indirect employment opportunities, both during the construction phase and operation phase (at the educational facility, office space and ancillary spaces). Careful planning over the phasing and construction of the development will ensure that the effects of the construction will not be significant. The site currently comprises two industrial warehouses which are part occupied. The operational phase of the proposed development will continue to support local employment through the range of direct and indirect jobs supported by the higher education facility, office space and other ancillary services at the site.

Overall, these effects are not likely to give rise to significant environmental effects that would require consideration as part of an EIA.

**Noise and Vibration**

Noise arising from road traffic on the surrounding road network of the site and the existing industrial uses are understood to be the primary sources of existing ambient noise at the site. The development's anticipated reduction in car use is unlikely to give rise to any material noise effects. Cars are likely to be the most regular
vehicle accessing the site, rather than HGVs and the area is already well trafficked, so traffic associated with the scheme will not have any perceptible noise impact.

Normal controls would be expected to be applied in relation to site operating hours for construction noise and vibration and, if required, via a Control of Pollution act section 60/61 notice. Noise control measures are likely to include considerate selection and location of plant equipment, and engineering measures including acoustic attenuation and enclosure.

Therefore, in conclusion no significant noise effects are expected as a result of the development.

**Air Quality**

*Construction Phase*

Other than negligible emissions from construction vehicles and equipment, the main emissions during construction are likely to be dust and particulate matter generated during earth moving (particularly during dry months) or from construction materials. The main potential effects of dust and particulate matter are:

- Visual - dust plume, reduced visibility, coating and soiling of surfaces leading to annoyance, loss of amenity, the need to clean surfaces;
- Physical and/or chemical contamination and corrosion of artefacts;
- Coating of vegetation and soil contamination; and,
- Health effects due to inhalation e.g. asthma or irritation of the eyes.

A number of other factors such as the amount of precipitation and other meteorological conditions will also greatly influence the amount of particulate matter generated.

Construction activities can give rise to short-term elevated dust/PM$_{10}$ concentrations in neighbouring areas. This may arise from vehicle movements, soiling of the public highway or windblown stockpiles.

Through appropriate best practice mitigation measures within the Construction Environmental Management Plan, it is not expected that there will be a significant effect on air quality during the construction phase.

*Operational Phase*

As required under section 82 of the Environment Act 1995, London Borough of Brent (LBB) has conducted an ongoing exercise to review and assess air quality within its area of jurisdiction. The assessments have indicated that concentrations of NO$_x$ are above the relevant AQOs at a number of locations of relevant public exposure within the Borough. LBB has therefore designated one Air Quality Management Area (AQMA), which are described as:

- London Borough of Brent AQMA: The entire area south of the North Circular Road and all housing, schools and hospitals along the North Circular Road, Harrow Road, Bridgewater Road, Ealing Road, Watford Road, Kenton Road, Kingsbury Road, Edgware Road, Blackbird Hill, Forty Lane, Forty Avenue and East Lane.

The proposed development is within London Borough of Brent AQMA.

*Continuous Monitoring*

LBB operates three automatic monitoring stations within its jurisdiction. This offers continuous records of NO$_x$ and PM$_{10}$ concentrations within the direct area. The most recently available monitored NO$_x$
concentration data are from 2016 at the locations shown in Table 1 below. The nearest automatic station is 1.3 km from the proposed development.

<table>
<thead>
<tr>
<th>Site ID</th>
<th>X</th>
<th>Y</th>
<th>Location</th>
<th>Site Type</th>
<th>NO₂ Annual Mean Concentration 2016 (μg/m³)</th>
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<tr>
<td>Brent - Ikea</td>
<td>520866</td>
<td>185169</td>
<td>Drury Way</td>
<td>Roadside</td>
<td>76</td>
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<tr>
<td>Brent – John Keble</td>
<td>521619</td>
<td>183554</td>
<td>Crownhill Road</td>
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<td>45</td>
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<td>Primary School</td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Brent – Neasden Lane</td>
<td>521511</td>
<td>185204</td>
<td>Neasden</td>
<td>Industrial</td>
<td>44</td>
</tr>
</tbody>
</table>

As indicated in Table 1, the automatic monitoring station exceeds the AQO (40 μg/m³ annual mean).

Background concentrations as used within the prediction calculations were referenced from the UK National Air Quality Information Archive database based on the National Grid Co-ordinates of 1 x 1 km grid squares nearest to the development site. In June 2014, DEFRA issued revised 2013 based background maps for nitrogen oxide (NOₓ), NO₂, PM₁₀ and PM₂.₅ which incorporate updates to the input data used for modelling. 2017 background maps have been utilised throughout the assessment to provide a conservative assessment. The updated mapped background concentrations used in the assessment are summarised in Table 2.

<table>
<thead>
<tr>
<th>UK NGR(m)</th>
<th>2017 Annual Mean Concentration (μg/m³)</th>
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<tr>
<td></td>
<td>NO₂</td>
</tr>
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Londonair.org.uk published a map of concentrations across London in 2011 which highlighted areas which exceeded the Air Quality objective. A map of the study area from this map is shown below.
The map shows that, while the site area is generally below the objective, roads around the site do experience some exceedances.

Based on the review of the background concentrations, it is expected that there is the potential for additional mitigation to be required at the proposed development to mechanically ventilate Nitrogen Oxides. The extent of this mitigation will be established by undertaking detailed air quality dispersion modelling.

Following consultation with the traffic consultants, the trip generation associated with the development is not considered to be significant and it is not expected that trips associated with the development will have a significant impact on local air quality.

**Ecology**

The site was subject to a Preliminary Ecological Appraisal (PEA) in July 2017. The PEA was undertaken in accordance with Guidelines for Preliminary Ecological Appraisal produced by the Chartered Institute of Ecology and Environmental Management (CIEEM) in April 2013. Methods were also in accordance to the general principles contained within British Standards Institute (BSI) BS42020 – Biodiversity-Code of Practice for Planning & Development.
The survey identified that the site is located in a developed, urbanised location, approximately 250m to the north east of Wembley Stadium. The site is bounded to the north, east and south by adjoining industrial / business premises, with First Way situated along the western boundary.

Within the survey boundary, the site comprises an industrial / business park dominated by concrete/tarmac hard standing, with buildings situated at the northern and eastern sections of the site. The buildings are flat roof/block and steel frame construction. The site is largely devoid of vegetation with the exception of a small, relatively unmanaged grass verge located at the western perimeter bounding First Way, with two semi mature trees situated at the southern section of the verge. Internally, a small island containing a semi mature rowan tree and introduced shrubs.

In consideration of ecological value, the survey concludes that the site is of low ecological value. The site is dominated by hard standing/buildings and is isolated as a result of surrounding urban development presents a significant barrier to potential colonisation and ecological connectivity. No further surveys in respect of protected/priority species are considered to be necessary or appropriate given the very limited quality of habitats presented by the site and surroundings, and absence of potential habitats.

The survey did identify that the buildings, trees and vegetation present limited habitat for nesting birds, with evidence of pigeons utilising Unit No. 1. However, it is considered that with the employment of standard due diligence during/timing demolition/tree works, there would be no adverse impacts upon nesting birds.

Through the application of appropriate design and landscaping, it is concluded that development would present an opportunity to enhance the ecological condition of the site for local biodiversity.

Archaeology/Heritage

The site does not contain any nationally designated (protected) heritage assets, such as scheduled monuments, listed buildings or registered parks and gardens. The site is not in an Archaeological Priority Area.

A desk-based study by MOLA, taking into account the known archaeological data in the area and historical maps, has assessed the key archaeological potential of the site to comprise:

- truncated remains of the India Pavilion constructed for the Empire Exhibition of 1924, of low significance.

The impact of the scheme on archaeological remains would be direct, adverse and permanent, arising from demolition, site preparation and foundation construction. These would truncate or remove buried remains entirely within the area of impact, reducing their heritage significance in the areas affected to negligible or nil.

Extensive remains of high significance are not, however, anticipated, and it is considered that the potential adverse effects of the scheme on the archaeological resource are not of a magnitude to require EIA. It is likely that the impact on archaeological heritage assets present will be successfully mitigated through a process of preservation by record, i.e. a watching brief during groundworks. Any archaeological work would need to be undertaken in accordance with a Written Scheme of Investigation (WSI) which can be secured via a standard archaeological planning condition set out under the granting of planning consent.

Ground Conditions and Contamination

Initial intrusive ground investigation was undertaken in June 2017. These works included, cable percussive boreholes, windowless sampler boreholes and hand excavated foundation inspection pits

During the investigation ground conditions were noted to consist of:
• Made Ground to depths of between 0.6m to 1.5m below ground level (m bgl). These materials consisted of hardstanding (asphalt and concrete) overlying brick and a locally clayey gravelly sand;

• These materials overlay material that is currently assessed as consisting of grey / brown high strength Clays. From the descriptions covered in Section 3.2 of the desk study carried out by Jomas (August 2016) it is considered that these materials represent London Clay;

• From approximately 29m this material was shown to overlie a very dense clayey sand. This material is considered likely to represent deposits of the Lambeth Group.

During the investigation no visual or olfactory evidence for gross contamination was noted. During the formation of the exploratory holes ground water was not encountered.

The London Clay materials are identified as being an “unproductive” aquifer within the Desk Study. As such and the depth of material encountered it is considered that these materials would provide a suitable barrier layer to prevent the migration of contamination to groundwater within the Lambeth Group.

Given the above, there are not anticipated to be significant environmental impacts requiring EIA for ground conditions and contamination.

Wind Environment

The potential sources of impact on the wind microclimate in an around the site will be:

• Downdraughts from the windward facades of the proposed development, with subsequent funnelling and acceleration around corners of the resulting low-level winds, will lead to locally accelerated wind flows;

• Channelling of winds along the facades of the proposed buildings will also create locally accelerated winds;

• Changes in planned usage of the site will introduce more wind sensitive activities and increase pedestrian awareness of the local wind microclimate.

Design development will ensure that these impacts are suitably mitigated against. Given the built up nature of the emerging Wembley masterplan, it is not anticipated that a development of the proposed height is likely to create a wind environment that would have significant effects on the surrounding environment requiring EIA.

Daylight/Sunlight

The impact on Daylight and Sunlight is usually limited to “habitable” rooms within existing neighbouring residential dwellings. There are no existing neighbouring residential dwellings in close proximity of the Site that could be affected by the proposed development as the Site is located in an industrial estate set within industrial warehouse buildings and the open surface level car park serving Wembley Stadium. There are therefore no existing receptors that could be affected by the proposed development. As the site and surroundings are part of the wider Wembley Development Area and Masterplan, the relationship of the proposed development will be designed to ensure that any impacts are minimal. Given the distances of the proposed surrounding emerging developments, it is not anticipated that any impacts will be significant.

Planning Submission

Notwithstanding your consideration of the requirement for EIA in connection with the proposed development, additional material will accompany the application to assist in your consideration of the proposals. The material will comprise:-
• Accessibility Management Plan;
• Air Quality Assessment;
• Arboricultural Assessment;
• CIL Form, Application Form and Notices;
• Construction Logistics Plan;
• Daylight and Sunlight Report;
• Delivery and Servicing Plan;
• Design and Access Statement (to include Landscape);
• Desk Based Archaeological Assessment;
• Drawings;
• Flood Risk Assessment;
• Noise Assessment;
• Phase 1 Contaminated Land Desk Study;
• Planning Statement;
• Report on Demand for UCFB Student Accommodation;
• Statement of Community Involvement;
• Student Accommodation Report;
• Sustainability and Energy Statement;
• Sustainable Urban Drainage Strategy;
• Townscape and Visual Impact Assessment;
• Transport Assessment;
• Travel Plan;
• Wind Assessment.

Conclusion

We trust that you have sufficient information to determine whether this is an EIA development under the 2017 Regulations. From these Regulations, we note that the local authority has three weeks (beginning from the date of receipt) to form a screening opinion and to provide the main reasons for this opinion having regard to the relevant criteria listed in Schedule 3. If adopting a negative screening opinion, we note that the LPA must also state any features of the proposed development and measures envisaged to avoid and prevent what might have otherwise been, significant adverse effects on the environment.

Please contact Owain Nedin or me if you have any questions.

Yours faithfully,

James Jaulim
Senior Planner
Annex 1: Site Location Plan