1 INTRODUCTION

1.1 Wembley Link LLP (hereafter referred to as ‘the Applicant’) is seeking to obtain full planning permission for a residential development on an approximate 0.63 ha site in Wembley, London. The proposal is for the erection of two residential buildings behind High Road (A404) in Wembley, London. The site is in the administrative authority of London Borough of Brent (LBB). A Red Edge Boundary Plan of the proposed site can be found at Appendix 1.

1.2 The proposed development is located on land to the north of High Road (A404), Wembley. It forms Phase 2 of the Wembley Link development with Phase 1 currently being implemented following planning approval in September 2016 for the redevelopment of the former Chesterfield House. The Wembley Link development in total consists of four phases with the third and fourth phases to be located to the east of Phase 2. These phases shall be applied for separately to this application at a later date.

1.3 Phase 1 of the development comprises the adjacent Chesterfield House located to the immediate west of Phase 2. The permission for Phase 1 comprises the erection of a part 21, part 26 storey building to provide 239 new rented homes, a new public square, a community centre and active frontages at ground floor (permission ref: 15/4550).

1.4 Full planning permission will be sought for Phase 2 of the Wembley Link site for approximately 250 residential dwellings spread across two buildings. These will be lower in scale than the Phase 1 consented scheme on the Chesterfield House site.

1.5 The Applicant is in the process of undertaking a range of environmental surveys and technical assessments across the site to inform the proposed development. The information obtained to date has been used to inform the scope of the Environmental Impact Assessment (EIA) as set out in this Scoping Report.

REQUIREMENTS FOR ENVIRONMENTAL IMPACT ASSESSMENT

1.6 The 2017 EIA Regulations require that for certain planning applications, an EIA must be undertaken. Schedule 1 of the 2017 EIA Regulations lists developments that always require EIA and Schedule 2 of the EIA Regulations lists developments that may require EIA if it is considered that they could give rise to significant environmental effects.

1.7 Regulation 6 of the 2017 EIA Regulations makes provision for a developer to request a ‘Screening Opinion’ from the Local Planning Authority (LPA) to ascertain whether an EIA is required if a

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development is classed as a Schedule 2 development. This decision is based on the likelihood of significant environmental effects arising in relation to the development proposals. In this instance, it is considered that the proposals constitute 'EIA Development' due to the scale, nature and location of the proposed development. Accordingly, a request for a formal EIA Screening Opinion has not been submitted and an EIA will be undertaken.

1.8 The application qualifies as EIA development under Schedule 2, Category 10 'Infrastructure Projects', Subsection (b) 'Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas'.

**EIA SCOPING**

1.9 Under Regulation 15 of the 2017 EIA Regulations, a person who is minded to make an EIA application may ask the relevant planning authority to state in writing their opinion as to the information to be provided and subsequently reported in an Environmental Statement (ES) (a 'Scoping Report'). The scoping process is an integral part of undertaking an EIA and its purpose is to provide relevant background information about the site, the proposed development, key environmental issues and the approach to the assessment.

1.10 This Scoping Report outlines the proposed development and identifies issues that will be assessed by the EIA and reported in the ES that will accompany the planning application. The objectives of the scoping process are to:

- Provide a detailed description of the development, including its physical characteristics and land use requirements;
- Identify key environmental topics that the EIA will consider;
- Define the extent to which environmental topics will be investigated;
- Allow consultation with the LPA, and Statutory and Non-Statutory consultees; and,
- Provide a mechanism for agreeing the content and methodology of the EIA with stakeholders at an early stage in the process.

**STRUCTURE OF THE REPORT**

1.11 This report is divided into the following sections:

- **Section 2: Site Context**: This section describes our understanding of the current conditions of the site and the surrounding area.
• **Section 3: Description of Development:** This section provides a description of the development.

• **Section 4: EIA Approach:** This section provides the proposed approach to undertaking the EIA.

• **Section 5 Alternatives:** This section sets out the approach to the consideration of the main alternatives studied by the developer.

• **Section 6 Planning:** This section sets out the planning policy context that will be considered in the EIA.

• **Sections 7 - 11: Environmental Assessment Topics:** Outlines the proposed methodology for the ES and for each technical assessment expressed as chapters and/or appendices of the ES.

• **Section 12: Non-Significant Issues:** Sets out those environmental issues deemed to be non-significant for the purposes of EIA and that would not be included as a chapter in the ES.

• **Section 13: Structure of the Environmental Statement:** Defines the proposed structure of the ES, chapters and document formats.

1.12 It should be noted that the Scoping Report has been produced using currently available information in relation to the site and the proposed development. However, the design of the proposed development is still evolving and will continue to do so throughout the EIA process. This is important as it allows an iterative design process to be followed which takes account of environmental issues and community engagement and allows for the incorporation of mitigation measures into the proposals. Therefore, minor changes to the proposals between the scoping of the EIA and the submission of the application should not necessarily require the EIA to be fully re-scoped. The assessment scopes presented here relate to the general principles of the proposals and parameters for assessment; hence the scope can accommodate minor and non-material amendments to the proposals. If the scheme changes materially, further scoping may be required in consultation with LBB.
2 SITE CONTEXT

2.1 This section sets out the geographical context of the site and summarises the potential environmental constraints and sensitive receptors in the vicinity.

SITE LOCATION AND DESCRIPTION

2.2 The site is located on approximately 0.63 ha of land in the centre of Wembley, London. The site is centred on grid reference TQ185853 within the administrative authority of LBB in the Wembley Central ward. The site sits within a key strategic location for growth for both the Borough and for London, being within an Opportunity Area, Growth Area, Housing Zone and Town Centre. The site location is presented at Appendix 1. It is located in close proximity to the Wembley Stadium complex and Wembley Town Centre.

2.3 The site is irregular in shape and comprises heavily overgrown land which accommodates part of the rail sidings of the Chiltern Rail Line. The surrounding area comprises a mix of commercial and residential uses. The ARK Elvin Academy is also located in close proximity to the site (approximately 60m southwest).

2.4 The site is bound to the north by the Chiltern Rail Line railway, to the east by land defined as the Phase 3 and 4 sites, to the west by Chesterfield House (Phase 1 site) and Park Lane (A4089), and to the south by a number of buildings which front on to High Road (A404).

2.5 Spatially, the site is located within walking distance of local services, such as shops, schools, health and community facilities. All the surrounding roads in the vicinity of the site include footways, street lighting and suitable crossing facilities along key pedestrian routes.

2.6 The site is highly accessible by public transport with the adjacent High Road (A404) and Park Lane (A4089) having a Public Transport Accessibility Level (PTAL) of 6a and 5 respectively\(^2\). There are 12 bus routes available from the adjacent Park Lane (A4089) and High Road (A404). The closest bus stop is located to the west on Park Lane. The closest railway station is Wembley Central which serves National Rail, Underground (Bakerloo line) and Overground services (located approximately 300m southwest). Wembley Stadium Station is also in close proximity to the site which provides National Rail services (located approximately 380m east). The site is served by around 110 buses to a variety of locations per hour across London, as well as 12 Underground services between Elephant & Castle and Harrow & Wealdstone, six Overground services.

\(^2\) Each area is graded between 0 and 6b, where a score of 0 is very poor access to public transport, and 6b is excellent access to public transport.
services to London Euston and Watford Junction and nine National Rail services to locations across south England during the peak hour period.

2.7 There are no watercourses or water bodies present on site. The closest water course is Wembley Brook that is located approximately 620m south of the proposed development.

2.8 The site lies within Flood Zone 1 (1 in 1,000 annual probability of river flooding) and is at very low risk from surface water and reservoir flooding. However, the land immediately to the north on the Chiltern Rail Line railway is at medium to high risk of surface water flooding. As this area is located on the other side of the railway embankment it does not present a significant risk to the site in terms of surface water flooding.

2.9 The site lies within the Wembley Stadium Critical Drainage Area (CDA). With regards to CDAs, LBB that:

"...it is vital that stringent planning policy is in place to ensure that any future development in this area takes into account source control measures and does not contribute to flood risk in this area."

2.10 There are no statutory ecological designations on site or within 2km of the proposed development. However, the site is included in the non-statutory designated Chiltern Line Site of Importance for Nature Conservation (SINC). According to LBB the current designation of the SINC is 'Borough Importance Grade I'.

2.11 The underlying bedrock on site comprises of London Clay Formation. There are no recorded superficial deposits on site.

2.12 There are no operational or historic landfills on or within the vicinity of the site. The closest historic landfill site is the Twyford Service Station (located approximately 1.9km southeast of the site) which was operational between 1905 and 1968 and received inert, industrial, commercial and household waste. The site is not located within a Coal Mining Reporting Area. There are no records of mining activities on or within the vicinity of the site.

2.13 The site lies within the Brent Air Quality Management Area (AQMA), declared to manage Nitrogen Dioxide (NO₂) and dust (PM₁₀). The AQMA currently meets its objectives for PM₁₀ but exceeds the annual mean targets for NO₂.

2.14 Wembley High Street Conservation Area is located approximately 300m north of the proposed development. There are no listed buildings or structures located within the immediate vicinity of
the site. There is one Listed Building located within 500m of the site (Grade II Listed Roman Catholic Church of St Joseph located approximately 280m southeast of the site).
3 DESCRIPTION OF THE PROPOSED DEVELOPMENT

3.1 The application will be submitted to LBB and will seek detailed approval for Phase 2 which includes:

- Approximately 250 residential units (Use Class C3) spread across two buildings with a height of up to 63m above ground level;
- Approximately 12 Disabled Car Parking Spaces;
- Landscaping;
- Associated infrastructure; and,
- Detailed means of access and servicing.

3.2 The ES will include a detailed description of the proposed development and the construction activities required for its delivery. This section of the ES will also include a summary of the general principles required to avoid or reduce impacts during the construction stage.

3.3 The description of the development will also include information on those mitigation measures that have been designed into the proposals, having been identified as necessary through the EIA process. These features of the proposals will be considered to be part of the development that is subject to the final assessment of impacts presented in the ES. Where mitigation measures are not of a nature that they can be designed into the scheme, they will be specified separately.

3.4 The description of development will be refined through the EIA process and the continuous process of consultation with the LPA, key stakeholders and the local community.
4 EIA APPROACH

4.1 This section details the proposed technical areas for assessment within the ES. It sets out the legislative framework, an outline of the intended approach to assessment and the potential effects that have been identified at this stage. Where sufficient information is known at this stage, it outlines potential mitigation measures.

POTENTIALLY SIGNIFICANT ISSUES

4.2 The scoping exercise has identified several study areas which have the potential to generate significant environmental effects. Accordingly, the following environmental issues have been 'scoped in' to the EIA for the proposed development:

- Townscape & Visual;
- Heritage;
- Ecology and Nature Conservation;
- Wind Microclimate; and,
- Daylight, Sunlight and Overshadowing.

4.3 Each of these technical assessment areas is discussed in greater detail in Sections 7 - 11 of this report.

EIA APPROACH AND METHODOLOGY

4.4 The ES will be prepared to fully comply with Schedule 4 (Part I and II) of the 2017 EIA Regulations: ‘Information for Inclusion in Environmental Statements’; and in accordance with National Planning Practice Guidance (NPPG).

4.5 The 2017 EIA Regulations state that an ES should include:

"4. A description of the factors specified in regulation 4(2) likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape."
5. A description of the likely significant effects of the development on the environment resulting from, inter alia:

(a) the construction and existence of the development, including, where relevant, demolition works;

(b) the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;

(c) the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste;

(d) the risks to human health, cultural heritage or the environment (for example due to accidents or disasters);

(e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;

(f) the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change;

(g) the technologies and the substances used.

The description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development. This description should take into account the environmental protection objectives established at Union or Member State level which are relevant to the project, including in particular those established under Council Directive 92/43/EEC(a) and Directive 2009/147/EC(b)."

4.6 A consistent approach will be adopted throughout the EIA to ensure that likely significant effects are identified and evaluated in a transparent manner. Each environmental assessment topic will adopt the following approach:

- Baseline Assessment and Identification of the Study Area;
- Identification of Sensitive Receptors;
• Identification of Embedded Mitigation Measures;
• Identification of Potential Impacts during Construction and Operation of the Proposed Development (including indirect, direct, adverse and beneficial);
• Assessment of Impact Significance;
• Identification of Potential Impacts Mitigation Measures;
• Assessment of Residual Impacts;
• Assessment of Cumulative Impacts.

**EIA Parameters**

4.7 The assessment of effects will be undertaken on the basis of the quantum of development and the detailed planning application drawings and elevations. These drawings will include detailed layout, heights, elevations, widths, landscaping and access arrangements to the site.

**Significance Criteria**

4.8 The assessment of significance will be undertaken for all potential effects to determine their relative importance. The following criteria will be considered when assessing their significance:

- Magnitude (size of effect);
- Spatial extent (size of the area affected);
- Duration (short, medium or long term);
- Nature of the effect (direct or indirect, reversible or irreversible);
- Sensitivity of the surrounding environment and receptors;
- Inter-relationship between effects;
- International, national or local standards; and
- Relevant planning policy.

4.9 Where appropriate and not restricted by the requirements of specific guidance, the significance criteria in Table 4.1 below will be used to categorise predicted effects. Where alternative
classifications have been used in order to comply with specific guidance, they will be explained in the methodology sections within each technical assessment. The significance levels identified can be either adverse or beneficial.

Table 4.1: Significance Criteria

<table>
<thead>
<tr>
<th>Significance</th>
<th>Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>Major</td>
<td>These impacts are likely to be important considerations at a regional or district scale but, if adverse, are potential concerns to the project, depending upon the relative importance attached to the issue during the decision making process. Mitigation measures and detailed design work are unlikely to remove all of the impact upon the receptor.</td>
</tr>
<tr>
<td>Moderate</td>
<td>These impacts, if adverse, while important at a local scale, are not likely to be key decision making issues. Nevertheless, the cumulative effect of such issues may lead to an increase in the overall effects on a particular area or a particular resource. They represent issues where impacts will be experienced but mitigation measures and detailed design work may ameliorate/enhance some of the consequences upon affected communities or interest. Some residual impact may still arise.</td>
</tr>
<tr>
<td>Minor</td>
<td>These effects may be raised as local issues but are unlikely to be of importance in the decision making process. Nevertheless, they are of relevance in the detailed design of the project and consideration of mitigation measures.</td>
</tr>
<tr>
<td>Negligible</td>
<td>Potential impact is beneath levels of perception, within normal bounds of variation or within the margin of forecasting error.</td>
</tr>
<tr>
<td>No Impact</td>
<td>No Impact is predicted.</td>
</tr>
</tbody>
</table>

Mitigation

4.10 Mitigation is defined as those measures that are required to avoid, remedy or offset the identified environmental impacts of a project. As described in Section 3, those mitigation measures that are identified through the EIA process and which have been designed in to the proposals such that they appear on the submission plans and are integral to the development will be considered to be part of the development for the final assessment as presented in the ES. This ‘embedded’ mitigation will be described in each technical chapter prior to the assessment of potential impacts.

It is placed in this order to enable an assessment of the impacts to be made which takes into account the mitigation measures which have been designed in to the proposed development, i.e. embedded into the design.

4.11 Mitigation that is not embedded into the proposals and which requires a commitment from the applicant to carry out further actions will be specified in the Mitigation section of each technical chapter and summarised in the Summary of Mitigation and Residual Effects chapter. These
measures would then be secured through the application of conditions attached to the planning permission or through an appropriate legal framework, such a Section 106 agreement.

4.12 As set out within paragraph 7 of Schedule 4 of the 2017 EIA Regulations, the EIA will include:

“A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.”

Residual Effects

4.13 Each ES chapter will conclude with a summary of the residual effects of the development once all related mitigation measures have been taken into account.

Cumulative Effects

4.14 The EIA Regulations also require the assessment of cumulative effects. Cumulative effects may be divided into two categories as follows:

- Additional impacts arising from interrelationships within the same scheme; and,

- Those arising from the scheme in combination with other committed developments. These are those which are existing (under construction) and/or approved (those with a resolution to grant).

4.15 Most cumulative effects result when construction phases of more than one development overlap. However, the assessment will also assess operational effects of more than one development, where appropriate.

4.16 Cumulative effects will be discussed as a separate chapter, assessing the potential for cumulative effects for each technical assessment, thus ensuring that the LPA can evaluate the impacts of the development in isolation and in conjunction with other developments in the area.

4.17 Table 4.2 shows the potential cumulative sites that have been identified in the vicinity of the proposed development. The ES shall consider the potential cumulative effects in combination with the proposed development.
Committed developments (those which are existing and/or approved) which are 10 storeys and above in height within a 2km radius of the proposed development were included in the cumulative developments to be assessed. Based on professional judgement and experience of EIA’s undertaken in an urban context, this distance is considered appropriate radius in which to identify those committed developments which may result in cumulative effects. Committed developments were identified by reviewing the planning website of LBB.

Table 4.2: Cumulative Sites

<table>
<thead>
<tr>
<th>Application No.</th>
<th>Proposal</th>
<th>Approx. Distance and Direction</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>15/4550</td>
<td>Proposed demolition of existing building and erection of 21 and 26 storey building comprising flexible retail/commercial (Use Classes A1-A4) and community uses (Use Class D1) at ground floor and basement level, 239 residential units (Use Class C3) on the upper floors and associated landscaping, public realm, ancillary servicing and plant, car and cycle parking and associated works, subject to a Deed of Agreement dated 22/09/2016 under Section 106 of the Town and Country Planning Act 1990, as amended.</td>
<td>Adjacent to western border of site</td>
<td>Approved on 22 September 2016 – Under Construction</td>
</tr>
<tr>
<td>15/4473</td>
<td>Proposed redevelopment of Montrose Crescent car park and land n/t 499 and 509 High Road, Wemble to include a part 3, 6, 13 and 18 storey development on Curtis Lane and a part 4 and 6 storey building on the High Road, Wemble comprising of 186 residential units (43 x 1 bed, 108 x 2 bed and 35 x 3 bed), 1,312 sqm of commercial space comprising A1, A2, A3, A5, B1(a) and/or D1 uses, replacement public car park comprising of 89 public car parking spaces, associated amenity space, landscaping, cycle parking, new lift access to High Road together with alterations to existing stepped access from the High Road to Curtis Lane and Station Grove and public realm improvements, and subject to a Deed of Agreement dated 17th May 2016 under Section 106 of the Town and Country Planning Act 1990, as amended.</td>
<td>Approximately 410m southwest of site</td>
<td>Approved on 20 May 2016 – Under Construction</td>
</tr>
<tr>
<td>15/4714</td>
<td>Demolition of existing office building and redevelopment to the site to provide a part 10 and part 21 storey building from podium level with 1,416sqm of A1 floorspace and 133sqm of flexible A1, A2 and A3 floorspace on the ground floor and 198 residential units (use class C3) above with car parking, communal and private amenity space, public realm improvements,</td>
<td>Approximately 400m northeast of site</td>
<td>Approved on 29 July 2016 – Under Construction</td>
</tr>
<tr>
<td>Application No.</td>
<td>Proposal</td>
<td>Approx. Distance and Direction</td>
<td>Status</td>
</tr>
<tr>
<td>----------------</td>
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<td>--------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>15/4743</td>
<td>landscaping and other associated works (revised description), subject to a Deed of Agreement dated 27 July 2016 under Section 106 of the Town and Country Planning Act 1990, as amended.</td>
<td>Approximately 160m southeast of site</td>
<td>Approved on 15 September 2016 – Under Construction</td>
</tr>
<tr>
<td>15/5550</td>
<td>Proposed demolition of existing office building and erection of two buildings of between eight and ten storeys accommodating 248 dwellings (84 x 1-bedroom, 108 x 2-bedroom, 49 x 3-bedroom &amp; 7 x 4-bedroom units) and flexible commercial space at ground floor (for Use Classes A1, A2, A3, A4 and/or B1(a)), new public square, landscaped communal gardens, associated landscape works, alterations to existing crossover(s) and basement car and cycle parking and subject to a Deed of Agreement dated 15 September 2016 under Section 106 of the Town and Country Planning Act 1990, as amended</td>
<td>Approximately 400m northeast of site</td>
<td>Approved on 23 December 2016 – Some Plots Complete and Others Under Construction</td>
</tr>
</tbody>
</table>

Hybrid planning application, accompanied by an Environmental Impact Assessment, for the redevelopment of the site including:

- Full planning permission for erection of a 10-storey car park to the east of the Stadium comprising 1,816 car parking spaces of which 1,642 are for non-residential purposes, up to 82 coach parking spaces and associated infrastructure, landscaping and vehicular access.

And

Outline application for the demolition of existing buildings on site and the provision of up to 420,000 sqm (gross external area) of new floorspace within a series of buildings comprising:

- Retail/financial and professional services/food and drink (Use Class A1 to A4) up to 21,000 sqm;
- Commercial (Use Class B1) up to 82,000 sqm;
- Hotel (Use Class C1): up to 25,000 sqm;
- Residential (Use Class C3): up to 350,000 sqm (up to 4,000 homes) plus up to 20,000 sqm of floorspace for internal plant, refuse, cycle stores, residential lobbies, circulation and other residential ancillary space;
- Education, healthcare and community facilities (Use Class D1): up to 15,000 sqm;
Application No. | Proposal | Approx. Distance and Direction | Status |
--- | --- | --- | --- |
| Assembly and leisure (Use Class D2): 23,000 sqm; Student accommodation (Sui Generis): Up to 90,000 sqm. And associated open space (including a new public park) and landscaping; car and coach parking (including up to 55,000 sqm of residential parking and 80,000 sqm non-residential parking) and cycle storage; pedestrian, cycle and vehicular accesses; associated highway works; and associated infrastructure including water attenuation tanks, an energy centre and the diversion of any utilities and services to accommodate the development. | | | |

4.19 We invite LBB to confirm whether there are any other committed developments in the area that should be included within the assessment of cumulative effects. The assessment of the cumulative sites will be based on the description of development, red line plans and any available masterplans/parameter plans for any identified sites.

4.20 Consideration will also be given to the potential synergistic cumulative effects, arising from the interaction of two or more environmental effects associated with the proposed development on a given receptor or resource. This shall include consideration of the Phase 3 and 4 development sites. As details of how these final elements of the Wembley Link development site are largely unknown at this time, a high level sensitivity test will be undertaken. This will be based on a number of reasonable assumptions of how these remaining phases could be developed.
5 ALTERNATIVES

5.1 If, at an early stage in the project, consideration is given to possible alternatives to the development proposals, some environmental effects can be avoided. The 2017 EIA Regulations require that the ES reports provide:

“A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects”.

5.2 Therefore, the ES will define the following types of alternatives considered by the applicants:

- The 'do nothing' alternative: Consideration of the impacts in the absence of the development;

- Alternative layout and designs: A description of the design evolution based on environmental constraints, potential effects and other considerations, with a description and account of the main reasons why alternatives layouts are dismissed and why the preferred options were selected.

5.3 No alternative sites have been considered for the proposed development. The development phase forms part of the Wembley Link site as identified within Wembley Area Action Plan (AAP) (adopted in January 2015) under Site W4: Wembley High Road/ Chiltern Line Cutting South with the objective of delivering a sustainable mixed-use community. As such, no alternative sites have been considered by the Applicant for the proposed development.
6 PLANNING POLICY CONTEXT

6.1 A planning policy context chapter will be included within the ES to assess the proposals against relevant planning policy. The details of policies relating to specific topics addressed within the ES will be contained within the relevant technical chapters.

CONTEXT

6.2 The Planning Policy will comprise a series of national planning documents including the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) alongside any relevant policies and guidance. Local planning policy documents will inform the approach to the EIA and the requirement for the proposed development.

6.3 The NPPF states the key role of planning is to contribute to the achievement of sustainable development. The NPPF sets out a series of planning policies under thirteen headings to achieve sustainable development. Those policies of relevance will be considered and reviewed in light of the proposed development.

6.4 The site is allocated within the Wembley Area Action Plan (AAP) (adopted in January 2015) under Site W4: Wembley High Road/ Chiltern Line Cutting South. The policy states that development should support the Council’s objective to maintain the viability and vitality of Wembley Town Centre, providing active frontages along High Road, whilst also creating a sustainable mixed-use community through the delivery of cafes; restaurants and bars; appropriate retail; and residential development (up to 890 units). The policy also states that offices, student accommodation or hotel uses would also be appropriate within the site.

6.5 The site is located within the London Plan area, which sets out the framework for the development of London over the next 20–25 years. Specifically, the Wembley Opportunity Area sets out the strategy for growth and regeneration in Wembley for the next 15 years.

6.6 The Wembley Link Supplementary Planning Document (SPD) (adopted in July 2011) sets out a development framework for the mixed-use development of the wider Wembley Link site.

APPROACH

6.7 The merits of the proposed development will be examined against the relevant planning policies and guidance adopted at national and local levels.

6.8 In particular the following issues will be considered:

- General Planning Principles;
• The compatibility and appropriateness of the proposed uses;

• The environment;

• Residential development;

• Affordable housing;

• Transport including car parking and cycle parking;

• Sustainability and energy; and

• Design (policy and guidance).
7 TOWNSCAPE & VISUAL ASSESSMENT

7.1 Townscape & visual effects are independent but related issues. Townscape effects are changes in the townscape as a resource, including its constituent elements, the aesthetic and perceptual aspects of the townscape, and its distinctive character; visual effects relate to the effects of change upon the views available to people and their visual amenity.

7.2 The Townscape and Visual Impact Assessment (TVIA) is to be carried out by Peter Stewart Consultancy. This section of the report sets out the assessment approach for undertaking a townscape and visual appraisal in relation to the proposed scheme.

7.3 The key issues to be addressed by the TVIA will be:

- The effect of the Proposed Development on views within the local and wider area;
- The effect of the Proposed Development on townscape character.

SITE CONTEXT

7.4 The site is located immediately south of the Chiltern Rail Line railway, and north of an interwar parade with retail use at ground floor level fronting High Road. Wembley Stadium lies some 500m to the north-west. The area is undergoing considerable regeneration. The wider area to the north and south are suburban in character.

PLANNING POLICY CONTEXT

7.5 National and local planning policy of particular relevance to the townscape and visual assessment is set out below.

National Planning Policy

7.6 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, which has three dimensions; economic, social and environmental. The NPPF states, at paragraph 14, that ‘At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision taking.’

7.7 Among the core planning principles set out at paragraph 17 are that planning should ‘always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings’ and should ‘conserve heritage assets in a manner appropriate to their
significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.’

Requiring good design

7.8 Section 7 of the NPPF deals with design. At paragraph 56, the NPPF states that ‘Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.’

7.9 Paragraph 60 states that ‘Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.’

7.10 Paragraph 61 states that ‘Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.’

7.11 Paragraph 63 states that ‘In determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area.’

7.12 Paragraph 64 states that ‘Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.’

National Planning Practice Guidance

7.13 The PPG includes a section called 'Design'. This explains, inter alia, the importance of good design, the planning objectives that good design can help to achieve, the qualities of a well-designed place, and how buildings and the spaces between them should be considered.

7.14 The planning objectives of design are stated to include promoting, inter alia, local character; safe, connected and efficient streets; a network of green spaces and public places; and cohesive and vibrant neighbourhoods.

7.15 In terms of the qualities that contribute to a well-designed place, the PPG states that a well-designed place should:
‘Be functional;

Support mixed uses and tenures;

Include successful public spaces;

Be adaptable and resilient;

Have a distinctive character;

Be attractive; and

Encourage ease of movement.’

7.16 The PPG identifies the following considerations which may be relevant in terms of how buildings and the spaces between them should be considered:

• ‘Layout - the way in which buildings and spaces relate to each other

• Form - the shape of buildings

• Scale - the size of buildings

• Detailing - the important smaller elements of building and spaces

• Materials - what a building is made from’.

Local Planning Policy

7.17 The Core Strategy (July 2010) sets out a spatial vision for how Brent should develop to 2026 and sets out the overarching spatial strategy and key planning policies for achieving this.

7.18 Policy CP5, ‘Placemaking’, states that in considering major proposals in growth areas, regard will be had to, inter alia, ‘The contribution towards the creation of a distinctive place with a positive sense of identity which is well connected and accessible. Consideration of the heritage of the area and investigate means of introducing continuity through urban design measures and the possibility of reusing and restoring buildings of merit.’ The supporting text notes that ‘Site design quality and neighbourhood design quality are both important because the Growth Areas are looking at regenerative changes across sites that will form distinctive new neighbourhoods, not just on individual sites...This is particularly important considering that many of the growth areas will be transformed from industrial areas into mixed use neighbourhoods.’
Policy CP6, ‘Design and Density in Place Shaping’ states that the following factors, inter alia, will be taken into account in determining density and requiring good design:

- “Where design is of the highest or exemplary standard, higher densities will be considered;
- Tall buildings are acceptably in the Wembley and South Kilburn growth areas, as identified in adopted SPDs…;
- Schemes will be assessed having regard to CABE’s design guidance.’

Policy CP 7, ‘Wembley Growth Area’, states that Wembley ‘…will become a high quality, urban, connected and sustainable city quarter’ which will be redeveloped for ‘…at least 11,500 new homes…’.

Chapter 4 of the Development Management Policies (November 2016), ‘Built Environment’, notes that a challenge for Brent is ‘…to ensure that all development is of a high design quality’ and that the Core Strategy sets out the strategic approach in growth areas, such as that including the Site.

Policy DMP7, ‘Brent’s Heritage Assets’, states that proposals for or affecting heritage assets should, inter alia:

“sustain and enhance the significance of the heritage assets, its curtilage and setting, respecting and reinforcing the streetscene, frontages, views, vistas, street patterns, building line, siting, design, height, plot and planform and ensure that extensions are not overly dominating” and should “contribute to local distinctiveness, built form, character and scale of heritage assets by good quality, contextual, subordinate design, and the use of appropriate materials and expertise, and improving public understanding and appreciation

The Wembley Area Action Plan (WAAP) (January 2015) is part of the development plan for Brent and it sets out the strategy for growth and regeneration in Wembley for the next 15 years.

Chapter 4, ‘Urban Design and Place Making’, identifies five ‘localities’ with different characters and urban forms. The Site falls within the locality known as ‘Wembley High Road’, which covers the existing town centre and its immediate context.

The WAAP goes on to consider the protection of views towards Wembley Stadium. Policy WEM6, “Protection of Stadium Views”, states that regard should be had to the impact of development on identified views of the National Stadium. Those viewpoints considered of relevance to the Site
are Barn Hill; Elmwood Park; Welsh Harp Reservoir; Wembley Park Station; The Bobby Moore Bridge; Olympic Way North of Fulton Road; and Chalkhill Park.

**Recognised Guidance**

7.26 The methodology for the townscape and visual impact assessment is based on the principles set out in the third (2013) edition of 'Guidelines for Landscape and Visual Impact Assessment' (GLVIA), produced by the Landscape Institute with the Institute of Environmental Management and Assessment. Reference will also be made to national, regional and local guidance and policies.

**APPROACH**

7.27 A brief overview of the methodology is presented below. A more detailed explanation will be provided as part of the townscape and visual impact assessment.

7.28 The aim of the assessment will be to identify, as far as is reasonably practical, the nature of the townscape and visual changes that will arise from the proposed development to assess significance and to make appropriate recommendations for the future mitigation of any resulting effects. The report will assess the effects of the proposed development on an identified set of townscape and visual receptors.

**Townscape Approach**

7.29 The townscape character areas to be covered will be identified in line with the approach set out below.

7.30 An assessment will be made of the Site and surrounding townscape in its existing state. This will be based on study of the historic development of the area with reference to relevant publications, including the WAAP, and study of the present-day condition of the area based on site visits, study of maps and aerial photographs, and relevant publications.

7.31 This analysis will inform the division of the study area into townscape areas i.e. geographical areas which have readily identifiable characteristics in common. The impact of the Proposed Development on these townscape areas will then be assessed, based on conclusions drawn from the views analysis.

**Views Approach**

7.32 The proposed viewpoints have been identified in light of the methodology set out below.
7.33 The study area for the visual assessment is centred on the site and limited to locations from which the Site can be seen, or from which new buildings on the site have the potential to result in a significant visual impact at the height proposed.

7.34 Four principal types of viewing location are identified:

- Views that have been identified as significant, by LBB or others, e.g. in relevant planning policy and guidance documents (including the WAAP) and conservation area appraisals;

- Other locations or views of particular sensitivity, including those viewpoints in which the Proposed Development may significantly affect the settings of listed buildings and conservation areas;

- Representative townscape locations from which the Proposed Development will be visible; and,

- Locations where there is extensive open space between the viewer and the Proposed Development so that it will be prominent rather than obscured by foreground buildings.

7.35 The set of viewpoints is chosen so that it covers:

- The range of points of the compass from which the Proposed Development will be visible;

- A range of distances from the site; and

- Different types of townscape area.

7.36 Possible locations in these categories within the study area are identified based on an examination of maps and aerial photographs; maps of conservation areas; and maps and lists of listed buildings. The study area and the possible locations are then visited to establish candidate viewpoints.

7.37 A list and a map of proposed views is provided at Appendix 2 for consideration by LBB.

**Significance Criteria**

7.38 Assessment of the effect of any proposed development on a receptor (an area of townscape or view) is made on the basis of professional judgement which takes into account relevant planning policies and guidance.
7.39 The sensitivity of the receptor as existing will be assessed as high, medium or low, depending on the importance, value and quality of the receptor, and its susceptibility to change, taking into account the quality of the receptor, and the nature and expectation of the viewer. The assessment of sensitivity takes into account the presence of any designated heritage assets (listed buildings, conservation areas, registered parks and gardens of special historic interest, world heritage sites) and non-designated heritage assets (locally listed buildings), and the amenity value of the viewing location and area in which it is located. The assessment of the sensitivity of the receptor under consideration is moderated to take into account a judgement about its quality in the round.

7.40 The magnitude of the change resulting from the Proposed Development will be assessed as major, moderate, minor or negligible according to the change to the receptor.

7.41 These two measures are combined to provide a measure of the significance – major, moderate, minor or negligible. The most significant effects being effects of major magnitude on receptors of high sensitivity.

7.42 Effects are assessed as beneficial, adverse, or neutral. The assessment as beneficial or adverse is a 'net equation', since with regard to the receptor that is being assessed, there may be both positive and negative effects as a result of the development.

7.43 For each of the identified views in the assessment to be produced, there will be images of the view ‘as existing’ and ‘as proposed’. ‘As proposed’ images are to be provided as ‘Accurate Visual Representations’ (‘AVRs’). AVRs are provided either as rendered (photorealistic) images (‘AVR3’) or as ‘wirelines’ (diagrammatic representations showing the outline of the proposed development, ‘AVR1’). Rendered and wireline images illustrate accurately the degree to which the development will be visible, and its form in outline. Rendered images also show the detailed form and the proposed use of materials for those elements of the proposal that are being applied for in detail.

7.44 Where other developments in the wider area which are committed and would be visible to a significant extent in the view, a further image showing these schemes together with the Proposed Development will be produced.

7.45 For each of the identified views, a description of the view as existing will be given, identifying its visual quality, sensitivity to change and reason for that sensitivity. A description of the view as proposed will then be given with an assessment, based on the method set out above, of the significance of the effect that the Proposed Development will have on the view. A further assessment will consider cumulative effects, if any, for each view (‘as proposed with cumulative’ images will also be provided as AVRs as noted above).
CUMULATIVE EFFECTS

7.46 As noted above, cumulative effects will be assessed in line with the definition of cumulative effects set out in Chapter 4: Approach. The approach to cumulative assessment will be to focus on the additional effects of the Proposed Development on top of the cumulative baseline.
8 HERITAGE

8.1 The heritage assessment will present a consideration of designated and non-designated built heritage assets. The assessment will set out the significance of the heritage assets, as defined by the NPPF as: buildings, monuments, sites, places or landscapes, “identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.”

8.2 The assessment will set out an appropriate hierarchy of defined “heritage interest” and identify any potential impacts on those components of the historic environment which may be described as heritage assets. The physical and visual impact of the proposed development on those heritage assets will be evaluated, presenting appropriate mitigation measures, where necessary, proportionate to the component’s heritage significance.

8.3 The Heritage assessment is to be carried out by Peter Stewart Consultancy.

SITE CONTEXT

8.4 The Site lies in Wembley Town Centre, immediately south of the Chilterns Rail Line railway and north of an interwar parade with retail use at ground floor level fronting High Road. Wembley Stadium lies some 500m to the north-west. The area is undergoing considerable regeneration. The wider areas to the north and south are suburban in character. There are a number of heritage assets in the local area, however, there are no listed buildings on site. The Roman Catholic Church of St Joseph located on High Road (Grade II) is the closest listed building and is located approximately 230m southeast of the site. Wembley High Street Conservation Area is the closest Conservation Area to the site and is located approximately 500m from the site, which is characterised by quaint cottages in a narrow cul-de-sac in the historical pattern of old Wembley Village.

PLANNING POLICY CONTEXT

8.5 National and local planning policy of particular relevance to the heritage assessment is set out below.


8.6 The legislative requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990, provide specific protection for buildings of special architectural or historic interest, over and above that provided by development management. Section 66 of the 1990 Act requires that, when considering whether to grant planning permission for development which affects a listed building,
the local planning authority, "shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses". Accordingly, the preservation of listed buildings is established in law as a duty for the Local Planning Authority.

8.7 With specific regard to the issue of Section 66(1) requires decision-makers to give, "considerable importance and weight" to the desirability of preserving the setting of listed buildings when carrying out the balancing exercise required to consider the impact of development proposals. The balancing exercise required by the Planning Authority (in accordance with the requirements of paragraph 134 of the NPPF) must have regard to the overarching statutory duty imposed by Section 66(1) to preserve the character of the building’s setting.

8.8 Also of relevance is Section 72 of the Act. This requires that the Council is charged with paying, "special attention…to the desirability of preserving or enhancing the character or appearance of [Conservation Areas]". This duty also applies to the setting of Conservation Areas.

National Planning Policy

8.9 Section 12 of the National Planning Policy Framework (NPPF), entitled 'Conserving and enhancing the historic environment' provides guidance for planning authorities, property owners, developers and others on the conservation and investigation of heritage assets. Overall, the objectives of Section 12 of the NPPF can be summarised as seeking the:

- Delivery of sustainable development;
- Understanding the wider social, cultural, economic and environmental benefits brought by the conservation of the historic environment;
- Conservation of England's heritage assets in a manner appropriate to their significance; and,
- Recognition of the value that heritage makes to our knowledge and understanding of the past.

8.10 In considering any planning application for development, the planning authority will be mindful of the framework set by government policy, in this instance the NPPF, by current development plan policy and by other material considerations.
Local Planning Policy

8.11 Policy DMP7, ‘Brent’s Heritage Assets’ of the Development Management Policies (November 2016), states that proposals for or affecting heritage assets should, inter alia, "sustain and enhance the significance of the heritage assets, its curtilage and setting, respecting and reinforcing the streetscene, frontages, views, vistas, street patterns, building line, siting, design, height, plot and planform and ensure that extensions are not overly dominating" and should “contribute to local distinctiveness, built form, character and scale of heritage assets by good quality, contextual, subordinate design, and the use of appropriate materials and expertise, and improving public understanding and appreciation”

APPROACH

8.12 The proposed scope of works includes a heritage assessment of the area surrounding the site. The aim of the assessment is to identify the nature of the built heritage assets within the study area, assess their significance and the potential impact of the proposed development upon them. Any possible mitigation measures will also be proposed.

8.13 The assessment will be based on the definition of “heritage assets” as set out in the National Planning Policy Guidance and NPPF. Therefore, a Heritage asset is described as a, “building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing)”.

8.14 A designated heritage asset is defined as a: “World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation”.

8.15 Consultation with the following organisations and of the following documentation will be undertaken:

- LBB;
- Historic England on-line National Heritage List for England;
- Statutory List of Buildings of Special Architectural and Historic Interest; and,
- LBB Development Plan Documents and other guidance.
8.16 The assessment will identify and evaluate the nature and likelihood of the impacts of the proposed development, in both the long and short term on heritage features against clearly defined criteria.

8.17 Significance will be assigned to impacts relative to the sensitivity of the resource and the magnitude of impact in accordance with best practice.

8.18 The development effects on built heritage can be direct, such as loss or damage to heritage features, or indirect, including the effect on the setting of a Listed Building. Any such impacts will be discussed and significance criteria applied. The significance criteria will be assessed using the significance criteria set out below. There will be no direct effects.

8.19 The development site does not contain any listed buildings. Above ground heritage assets around the site that have the potential to be affected to a significant extent will be considered. These include:

- The Roman Catholic Church of St Joseph, High Road is listed grade II;
- Wembley Hill Lodge, no. 114 Wembley Hill Road is listed grade II;
- Wembley Arena (formerly the Empire Pool), Engineers Way is listed grade II;
- St Andrew’s Presbyterian Church, Ealing Road is listed grade II;
- The Church of St John, High Road, is listed grade II. 1935;
- The front boundary wall and Lych Gate of St John’s Church, High Road are listed grade II;
- Wembley Fire Station, no. 591A Harrow Road is listed grade II;
- Wembley High Street Conservation Area;
- Locally listed buildings:
  - Brent Kosher Kitchen, Wembley United Synagogue, Forty Avenue;
  - No. 324 Harrow Road;
  - Charles Goddard House, High Road;
  - No. 591 Harrow Road;
• No. 593 Harrow Road;
• No. 595 Harrow Road; and
• No. 603 Harrow Road.

8.20 The sensitivity to change of each heritage asset or groups of assets is considered in relation to impacts (taking into account both direct and indirect effects). This is based on the designation and grade of the heritage asset and an assessment of its heritage significance (in light of NPPF policy), i.e. what elements of its fabric / constituent parts and setting contribute to its heritage significance (at the designated grade/level). It will be assessed as high, medium or low.

8.21 The likely significance of effects is derived through consideration of the magnitude of impact and the sensitivity to change of the heritage assets. This assessment takes into account the heritage significance of the particular heritage asset and how the Proposed Development will impact on this.

8.22 Effects are also assessed qualitatively as beneficial, adverse, or neutral in respect of their effect on the heritage significance of the heritage asset. This is in recognition of the fact that an effect on a heritage asset or its setting can enhance its heritage significance (a beneficial effect), harm its heritage significance (an adverse effect) or leave its heritage significance unchanged (a neutral effect). This consideration is independent of whether it is a major, moderate, minor or negligible change. This assessment takes into account the nature and condition of the heritage asset and its setting as found today and how these contribute to its heritage significance.

8.23 The general conclusions about the impact of the Proposed Development on heritage assets include consideration of the overall impact on the historic environment in the round.

**SIGNIFICANCE CRITERIA**

Determination of the importance/significance of heritage assets is based on existing statutory designations and for non-statutory designations professional judgement. Table 8.1 sets out the sensitivity of heritage assets.
Table 8.1: Sensitivity

<table>
<thead>
<tr>
<th>Heritage Importance</th>
<th>World Heritage Site</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Grade I and II* listed buildings</td>
</tr>
<tr>
<td></td>
<td>Grade I, II* Registered Park and Garden</td>
</tr>
<tr>
<td>Medium</td>
<td>Grade II listed buildings</td>
</tr>
<tr>
<td></td>
<td>Grade II Registered Park and Garden</td>
</tr>
<tr>
<td></td>
<td>Conservation areas</td>
</tr>
<tr>
<td>Low</td>
<td>Locally listed buildings / Others</td>
</tr>
</tbody>
</table>

Magnitude of Impact

8.24 Determining the magnitude of impact is based on an understanding of how, and to what extent, the proposed development would impact heritage assets.

8.25 The magnitude of the effect is a product of the extent of development impact on an asset. Effects are rated as High, Medium, Low and Negligible/Neutral. Impacts can be direct or indirect, adverse or beneficial. The criteria for assessing the magnitude of impact are set out in Table 8.2 below:

Table 8.2: Criteria for assessing the magnitude of impact

<table>
<thead>
<tr>
<th>Magnitude of effect (can be beneficial (+), neutral or adverse (-))</th>
</tr>
</thead>
<tbody>
<tr>
<td>High</td>
</tr>
<tr>
<td>Considerable effect on the Heritage Asset or its setting</td>
</tr>
<tr>
<td>Medium</td>
</tr>
<tr>
<td>Change to the Heritage Asset or its setting that is readily noticeable</td>
</tr>
<tr>
<td>Low</td>
</tr>
<tr>
<td>Slight change to the Heritage Asset or its setting</td>
</tr>
<tr>
<td>Negligible/Neutral</td>
</tr>
<tr>
<td>No change, or minor change that is barely perceptible</td>
</tr>
</tbody>
</table>

Significance of Impact

8.26 The significance of the impact of the proposed development on heritage assets is determined by the importance of the asset and the magnitude of impact to the asset.

8.27 Table 8.3 presents a matrix that demonstrates how the significance of impact has been calculated.
Table 8.3: Significance of impact

<table>
<thead>
<tr>
<th>Magnitude of Impact</th>
<th>Sensitivity of Receptor</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>High</td>
</tr>
<tr>
<td>High</td>
<td>Major</td>
</tr>
<tr>
<td>Medium</td>
<td>Moderate to Major</td>
</tr>
<tr>
<td>Low</td>
<td>Moderate</td>
</tr>
<tr>
<td>Negligible / Neutral</td>
<td>Minor/Negligible</td>
</tr>
</tbody>
</table>

CUMULATIVE EFFECTS

8.28 Cumulative effects will be assessed during the construction and operational phases in line with the definition of cumulative effects set out in Chapter 4: Approach.
9 ECOLOGY AND NATURE CONSERVATION

9.1 This section of the ES will present an assessment of the potential effects of the proposals on ecological receptors, which will be identified through desk-based study, site surveys and consultation with key stakeholders. The assessment will consider the potential impacts during both the construction and operational phases of the proposed development and where necessary, mitigation measures will be recommended where required. The approach proposed in this Scoping Report has been informed by the findings of the desk-based study, initial site survey work and published best practice guidance. This chapter of the ES will be prepared by Greengage.

SITE CONTEXT

9.2 The site forms part of the Chiltern Line Site of Importance for Nature Conservation (SINC) of Borough Importance Grade I. This is a non-statutory designation that stretches between Sudbury Hill and the River Brent. Accordingly, the site forms part of a wildlife corridor along the railway. Features that may be of value for a number of protected species have been identified on site including scrub habitat for reptiles and potential roosting habitat for bats in trees.

LEGISLATION AND PLANNING POLICY CONTEXT

National Planning Policy and Legislation

- The Conservation of Habitats and Species Regulations 2017 (as amended) (The Habitat Regulations);
- Wildlife and Countryside Act 1981 (as amended) (WCA);
- The Countryside and Rights of Way Act 2000;
- Natural Environment and Rural Communities Act 2006 (NERC);
- Hedgerow Regulations 1997;
- The Protection of Badgers Act 1992;
- Section 11: NPPF. Conserving and enhancing the natural environment; and
Local Planning Policy

9.3 The key local planning policy for consideration within the ecological assessment are as follows:

  - Policy 2.18 Green Infrastructure
  - Policy 5.10 Urban Greening
  - Policy 5.11 Green Roofs and Development Site Environs
  - Policy 7.19 Biodiversity and Access to Nature
- GLA Supplementary Planning Guidance (SPG): Sustainable Design and Construction
  - Nature conservation and biodiversity
  - Urban greening
- LBB Core Strategy
  - CP18 – Protection and Enhancement of Open Space, Sports and Biodiversity
- Development Management Policies: Paragraphs 4.10 and 5.6

Recognised Guidance

9.4 The assessment will be undertaken in line with best practice guidance documents to inform the approach and impact assessment. Those documents which will be used to inform the assessment are listed below:


Approach

9.5 The ES chapter will include an outline of the legislative framework in respect of nature conservation. It will then outline the approach taken to the various desk-based studies and site surveys undertaken and present the findings of these works. With this information, the Zone of Influence (ZoI) of the proposed development will be established.
9.6 Consultation with the following organisations and online resources is currently being undertaken:

- Greenspace Information for Greater London; and
- London Bat Group.

9.7 Baseline data will be collected in accordance with standard best practice methodologies published by the Chartered Institute of Ecology and Environmental Management (CIEEM), Natural England and other recognised bodies, as appropriate.

9.8 The Ecological Impact Assessment (EcIA) of the proposals upon identified ecological receptors will be undertaken with reference to:

- CIEEM; Guidelines for Ecological Impact Assessment in the UK & Ireland (January 2016);
- CIEEM; Guidelines for Ecological Report Writing (December 2015);
- CIEEM; Guidelines for Preliminary Ecological Appraisal (2013); and

**EVALUATION**

9.9 The evaluation of habitats and species is defined in accordance with published guidance (CIEEM 2016). The level of importance of specific ecological features is assigned using a geographic frame of reference, with international being most important, then national, regional, county, local and lastly, within the site boundary only.

9.10 Evaluation is based on various characteristics that can be used to identify ecological features likely to be important in terms of biodiversity. These include site designations (such as SSSIs), or for undesignated features, the size, conservation status (locally, nationally or internationally), and the quality of the ecological feature. In terms of the latter, quality can refer to habitats (for instance if they are particularly diverse, or a good example of a specific habitat type), other features (such as wildlife corridors or mosaics of habitats) or species populations or assemblages.

**SIGNIFICANCE CRITERIA**

9.11 The potential impacts will be determined through understanding how each feature responds to the various impacts associated with the proposed development. The significance of the potential
effects on each feature will be determined by considering the value of each nature conservation interest and the degree to which it may be affected (the ‘effect magnitude’).

9.12 In accordance with the CIEEM published guidance and terminology (CIEEM 2016), a significant effect, in ecological terms, is defined as an effect that either supports or undermines biodiversity conservation objectives for ‘important ecological features’ or for biodiversity in general. Conservation objectives may be specific, broad, or more wide-ranging, and can be considered at a range of geographical scales, including cumulative effects. Insignificant effects are those that would not result in such changes.

9.13 Once impacts have been assessed and defined using the geographical frame of reference advocated by CIEEM, using professional judgement each impact will be transposed into the standard terminology used throughout the ES.

9.14 These terms are based on the CIEEM guidelines and identify the type and extent of impact associated with the development proposals. The assessment will also identify the geographic scale at which the impact is significant in accordance with the CIEEM guidelines.

9.15 The following ecological receptors have been identified as being potentially present within the ZoI and have the potential to be affected by the development and are therefore scoped into the assessment:

- Non-statutory locally designated sites;
- BAP priority habitats;
- BAP priority species such as hedgehog, house sparrow and common frog;
- Badger;
- Reptiles;
- Bats; and
- Breeding birds.

9.16 Mitigation will be devised to avoid any significant impacts associated with the construction and operation of the proposed development on ecological features. Any other mitigation or enhancement considered appropriate would also be set out. Once the appropriate mitigation
measures have been proposed, the impacts remaining once they are taken into account will be identified (the 'residual impact').

**CUMULATIVE EFFECTS**

9.17 Cumulative effects will be assessed during the construction and operational phases in line with the definition of cumulative effects set out in Chapter 4: Approach.
10 WIND MICROCLIMATE

10.1 The wind microclimate assessment will evaluate the existing wind dynamics and prevailing wind direction to the site and surrounding area. The assessment will quantify the wind conditions and provide a measured understanding of the development’s impact on wind. The report will make reference to recommended mitigation measures (where needed to meet target conditions based upon the desired use), and mitigation measures will be implemented if necessary. The assessment will be undertaken by RWDI, a specialist wind engineering consultancy.

SITE CONTEXT

10.2 The existing wind microclimate conditions at the site will be assessed via wind tunnel testing. The local wind speed data measured in the wind tunnel will be combined with long-term meteorological data for the region to determine the probability of wind speed and direction throughout the year at the site.

10.3 The background wind climate is expected to be similar to other areas of London and Southeast England, which is characterised by prevailing southwesterly winds throughout the year (typically strongest during the winter months) and secondary prevailing winds from the northeast which typically occur during the late spring. These wind directions are likely to be responsible for the windiest conditions at the site, which will be quantified as part of the assessment.

PLANNING POLICY CONTEXT

National Planning Policy

10.4 The National Planning Policy Framework (2012) and associated Planning Practice Guidance refer to the fact that buildings (especially tall or large buildings) can affect local wind, and that this needs to be considered in design in order to ensure a high quality built environment.

Local Planning Policy

10.5 The London Plan (2016) requires that buildings should “not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate”, noting specifically the potential for tall or large buildings to cause unacceptable wind conditions.

10.6 Together with the London Plan, The Sustainable Design and Construction SPG (2014) goes into detail on the specific impacts that large buildings can have in relation to the local wind microclimate. It specifically notes the use of the Lawson Comfort Criteria as being an appropriate tool for assessing these impacts. The guidance states that:
“Where a proposed development is significantly taller than its surrounding environment, developers should carry out an assessment of its potential impact on the conditions at ground level and ensure the resulting design of the development provides suitable conditions for the intended uses.”

Recognised Guidance

10.7 The Lawson Criteria is recognised guidance to assess the impact of the proposed development on wind flows in public spaces. Lawson devised a scale for assessing the suitability of wind conditions in the urban environment based upon threshold values of wind speed and frequency of occurrence. This guidance will be used to inform the assessment.

Approach

10.8 The assessment will include the local development site, including select balconies and rooftop terraces where applicable. In addition, the assessment will also consider the immediate surrounding thoroughfares as appropriate.

10.9 Wind tunnel tests will be carried out for the development site and surrounding areas. Using the Lawson Comfort criteria, the assessment will focus on the comparison of the wind microclimate with the intended pedestrian use of the site. The assessment will consider wind from all wind directions and will be based upon long-term meteorological data for the site. A full statistical breakdown of the wind microclimate at locations on main thoroughfares, likely seating areas and main building entrances will therefore be provided. Where required, mitigation measures would be tested to ensure that the conditions on the site would be suitable for the desired use.

10.10 The conclusion of the wind tunnel testing will be summarised in an appropriate ES Chapter and the full wind tunnel results appended to the ES. The baseline, Proposed Development with existing surrounding buildings and the Proposed Development with cumulative surroundings will each be assessed quantitatively.

Significance Criteria

10.11 The significance of effects is based upon the likely suitability of wind conditions in each area against the current or planned pedestrian activities, with the sensitivity of receptors considered high. The table below sets out the significance effects based on current guidance. Table 10.1 below sets out the significance effects based on current guidance.
Table 10.1: Significance Criteria

<table>
<thead>
<tr>
<th>Significance</th>
<th>Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>Major</td>
<td>Where conditions are three comfort categories windier (adverse) or calmer (beneficial) than the required use.</td>
</tr>
<tr>
<td>Moderate</td>
<td>Where conditions are two comfort categories windier (adverse) or calmer (beneficial) than required for the desired use.</td>
</tr>
<tr>
<td>Minor</td>
<td>Where conditions are one comfort category windier (adverse) or calmer (beneficial) than required for the desired use.</td>
</tr>
<tr>
<td>Negligible</td>
<td>Where wind conditions are the same as the target conditions for the desired use.</td>
</tr>
</tbody>
</table>

**Cumulative Effects**

10.12 Cumulative effects will be assessed during the construction and operational phases in line with the definition of cumulative effects set out in Chapter 4: Approach.
11 DAYLIGHT, SUNLIGHT AND OVERSHADOWING

11.1 This section of the ES will present an assessment of the potential effects of the proposals on daylight, sunlight and overshadowing which will be identified through desk-based research and site surveys. The approach proposed in this Scoping Report has been informed by published best practice guidance. The ES chapter and assessment will be prepared by Anstey Horne.

SITE CONTEXT

11.2 Natural light refers to both daylight and sunlight. ‘Daylight’ refers to natural light where the source is the sky in overcast conditions, whilst ‘Sunlight’ refers specifically to the light coming directly from the sun. The purpose of the daylight and sunlight studies will be to establish the impact which the proposed development causes to the surrounding buildings and private open spaces considering current best practice guidelines.

PLANNING POLICY CONTEXT

11.3 There is no current, specific national planning policy or legislation relating to developments and their potential effects on daylight, sunlight, overshadowing. However, guidance is given within the Historic England (formerly English Heritage) / Commission for Architecture and the Built Environment (CABE) Guidance on Tall Buildings (Ref. 15-1). Paragraph 4.1.9 of this guidance recommends that the following criteria should be addressed:

“The effect on the local environment, including microclimate, overshadowing, night-time appearance, vehicle movements and the environment and amenity of those in the vicinity of the building.”

National Planning Policy

11.4 The National Planning Policy Framework (NPPF) (Ref. 15-2) stipulates:

“…planning policies and decisions should always seek to secure a good standard of amenity for existing and future occupants of land and buildings”.

11.5 There is no specific policy within the NPPF of relevance to daylight, sunlight and overshadowing.

Planning Practice Guidance (2014)

11.6 Whilst the Planning Practice Guidance (PPG) makes reference to daylight and sunlight amenity, when considering development proposals, it is normal to have regard to ‘Site Layout Planning for Daylight and Sunlight: a Guide to Good Practice (Second Edition)’ (referred to as the BRE guidelines) (Ref. 15-3), as discussed below.
Regional Planning Policy

Mayor's London Plan

11.7 The Mayor of London’s ‘London Plan – The Spatial Strategy for London Consolidated with Alterations since 2011’ (March 2016) sets out the spatial development strategy for London. It forms part of the development plan for Greater London, along with local plans of the London boroughs. There is also the December 2017 ‘London Plan – The Spatial Development Strategy for Greater London’ in draft for public consultation. This is still in draft, but nonetheless has been noted below.

11.8 Policy 7.6 (Architecture) from the March 2016 plan states that:

“buildings and structures should … not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate”.

11.9 The December 2017 London Plan, which is in draft for public consultation, states the following under Policy D4 Housing quality and standards:

“The design of development should provide sufficient daylight and sunlight to new housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.”

Mayor’s Housing Supplementary Planning Guidance

11.10 The Mayor of London’s ‘Housing Supplementary Planning Guidance’ (March 2016) provides guidance on how to implement the housing policies in the London Plan. It replaces the 2012 edition.

11.11 Part 1 of the SPG covers housing supply and sets out the Mayor’s approach to optimising housing output. In relation to the effect on daylight and sunlight to surrounding properties it advises:

“Policy 7.6Bd requires new development to avoid causing ‘unacceptable harm’ to the amenity of surrounding land and buildings, particularly in relation to privacy and overshadowing and where tall buildings are proposed. An appropriate degree of flexibility needs to be applied when using BRE guidelines[1] to assess the daylight and sunlight impacts of new development on surrounding properties … Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local
“...circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time.”

“The degree of harm on adjacent properties ... should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced, but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.”

**Local Planning Policy**

11.12 The development site is located within the London Borough of Brent (LBB) and the proposals will therefore be considered against the relevant policies and guidance.

11.13 In addition, the proposals will also be considered against SPG 19 Sustainable Design, Construction and Pollution Control (2003) which states under Section A that “A resulting layout strategy for London would include using sunlight as an amenity both indoors and outdoors...”.

11.14 SPG 17 Design Guide for New Development (2001) highlights under Section 3.4:

“New schemes will be expected to limit as far as possible the negative consequences of their development in terms of the loss of sunlight/daylight on existing development in the immediate vicinity and amenity space. To avoid unnecessary loss of direct daylight, developers may be required to produce sunlight and daylight study for summer and winter months to assess the impact of proposed development. Schemes that result in the significant loss or reduction of sunlight may be considered unacceptable.”

**Recognised Guidance**

11.15 The assessment will also be undertaken in line with best practice guidance documents to inform the approach and impact assessment. Those documents which will be used to inform the assessment are listed below.


**APPROACH**

**Study Area**

11.16 The scope of works will focus on the nearest sensitive receptors which are the residential receptors in the immediate vicinity of the site, these will be determined in line with the reasonable expectation of daylight and sunlight as per the BRE guidelines. The properties to be assessed as part of the ES will be as follows, working clockwise around the site:

- The residential units contained within 412 – 444 High Road;
- The Nursery at 388 High Road if required;
- 26 – 30 Ecclestone Place; and
- The residential units contained within 367 – 397 High Road.

**Significance of Effects**

11.17 The assessment will consider the number of windows / rooms affected, the magnitude of change and the levels of light retained.

11.18 The BRE Guidelines provide the criteria in Table 11.1 below to calculate daylight and sunlight impact assessments. This is used to calculate the significance of effects on nearby receptors.

*Table 11.1: BRE criteria for impact assessment.*

<table>
<thead>
<tr>
<th>Method</th>
<th>BRE Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>VSC</td>
<td>A window may be adversely affected if its VSC measured at the centre of the window is less than 27% and less than 0.8 times its former value</td>
</tr>
<tr>
<td>NSL</td>
<td>A room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area.</td>
</tr>
<tr>
<td>APSH</td>
<td>A window may be adversely affected if a point at the centre of the window received for the whole year, less than 25% of the APSH including at least 5% of the APSH during the winter months (21st September to 21st March) and less than 0.8 times its former sunlight hours during either period, and for existing neighbouring buildings, if there is a reduction in total APSH which is greater than 4%.</td>
</tr>
<tr>
<td>Method</td>
<td>BRE Criteria</td>
</tr>
<tr>
<td>--------</td>
<td>--------------</td>
</tr>
<tr>
<td>SHOG</td>
<td>An amenity area may be adversely affected if less than 50% of its area receives less than 2 hours of direct sunlight on 21st March and less than 0.8 times its former value.</td>
</tr>
</tbody>
</table>

11.19 There is no set criteria when assessing impact significance of a development. Therefore, best practice guidance and professional judgment will be used to determine any impacts based on the guidance set out in Appendix I of the BRE Guidelines. Potential effects will be identified as beneficial, adverse or negligible, and their magnitude of effects will be set out as Minor, Moderate and Major.

**CUMULATIVE EFFECTS**

11.20 Cumulative effects will be assessed during the construction and operational phases in line with the definition of cumulative effects set out in Chapter 4: Approach.
12 NON-SIGNIFICANT ISSUES

12.1 The section sets out those environmental issues deemed to be insignificant for the purposes of EIA, and as such have been 'scoped out' of the EIA process.

Ground Conditions

12.2 Given the nature of the known ground conditions on the adjacent Chesterfield House (Phase 1) site, it is considered that ground conditions of the Phase 2 site will be similar in nature. As such, it is likely that ground contamination, if present, will be limited to low levels of hydrocarbon contamination which is unlikely to require soil remediation. As such, no significant effects are anticipated, and it is considered unnecessary to include a ground conditions chapter in the EIA. A standalone Phase 1 Geo-Environmental Report will form part of the planning application submission.

Drainage and Flood Risk

12.3 The site is located in Flood Zone 1 meaning that the site has a less than a 1 in 1,000 (1:1000) annual probability of flooding. The site is also not at risk from surface water flooding, reservoir flooding, canal flooding or groundwater flooding. It is however acknowledged that the proposed development is within a Critical Drainage Area (CDA).

12.4 A Flood Risk Assessment and Drainage Strategy will be submitted as a standalone report with the planning application submission. The drainage strategy will set out the existing and proposed discharge rates, subject to agreement with the Lead Local Flood Authority. The Flood Risk Assessment shall also include an allowance for climate change when calculating discharge rates. These are not considered significant issues which require assessment through the EIA process and it is not anticipated that the proposed development will result in significant effects on drainage and flood risk. As such, this topic has been scoped out of the EIA.

Air Quality

12.5 Construction phase activities such as dust generation will be suitably mitigated through the implementation of best practice mitigation measures approved by the Institute of Air Quality Management set out within a Construction Environmental Management Plan (CEMP) which shall be secured by condition. These will be described in the Proposed Development chapter of the ES.

12.6 The site lies within the Brent Air Quality Management Area (AQMA), declared for its elevated levels of NO₂ and PM₁₀. However, it is not considered that the existing air quality conditions would
result in significant air quality impacts on future site users, such that they require assessment within the ES. Given the nature of the proposals, no significant increases in vehicle emissions are anticipated that would impact upon NO\textsubscript{2} or PM\textsubscript{10} levels. Due to the small number of parking facilities being provided, residents will be encouraged to use sustainable modes of transport and as such the number of vehicle trips generated by the proposed development during the operational phase is anticipated to be low. Therefore, no significant impacts with respect to air quality and dust are anticipated and this discipline has been scoped out of the EIA.

12.7 A standalone Air Quality report will form part of the planning application submission.

**Noise & Vibration**

12.8 Noise levels are expected to rise during the construction phase but due to the temporary nature of these works and the standard best practice mitigation measures to be implemented, it is not anticipated that noise and vibration during the construction phase will result in significant effects. Standard best practice measures will be incorporated into a Construction Environmental Management Plan which will be secured by condition and will be described in the Proposed Development chapter of the ES.

12.9 Noise levels are also not anticipated to rise significantly during the operational phase of development given the nature of the proposals and limited car use that will be attracted to the site once developed. Therefore, the proposed development will not give rise to any particular noise creating uses such that they require assessment within the EIA. In addition, the suitability of the site for residential use is considered appropriate from a noise perspective. Whilst there will be potentially elevated noise levels associated with rail movements along the Chiltern Line railway, it is considered that standard commonplace design measures can be incorporated into the building design to deal with this adjoining use. As such, no significant impacts are anticipated, and as such noise and vibration has been scoped out of the EIA.

12.10 A standalone Noise and Vibration report will form part of the planning application submission.

**Transport**

12.11 The proposed development is located within a sustainable location with excellent bus, Underground, Overground and rail links. A minimal number of car parking spaces shall be provided as part of the proposed development and as such no significant traffic movements are anticipated that would require consideration through the EIA. Given the highly sustainable location of the proposed development which shall encourage use of sustainable travel, it is not anticipated that there will be any significant highways and access impacts. On this basis, transport and access has been scoped out of the EIA.
12.12 A Transport Assessment and Travel Plan will be submitted as a standalone report with the planning application.

**Socio-Economics**

12.13 The socio-economic effects will also be considered in detail as part of the supporting planning statement submitted as part of the planning application. It is considered that the proposed development will have some economic benefits during the construction and operational phase. However, it is not considered these would be of a level of significance such that they require assessment in the EIA. As such, socioeconomics has been scoped-out of the EIA.

**Archaeology**

12.14 There is little evidence from desk-based records and the development of the adjacent Phase 1 area which would indicate the presence of pre-historic, Roman or early medieval and post medieval remains. Based on the information collected from desk-based records and the evidence noted on the Phase 1 site, it is considered that no significant impacts are anticipated on the archaeological resource such that they require assessment within the EIA. A watching brief can be undertaken during construction as a precautionary approach to ensure that any remains, if found, are adequately recorded which is standard best practice. This topic has therefore been scoped out of the EIA. A desk-based assessment will support the planning application submission.

**Lighting**

12.15 Artificial lighting is provided to encourage a safe environment for a range of activities including driving, cycling and walking. It is also used to enhance the environment by means of decorative and flood lighting of areas, features and buildings. Any new lighting proposed as part of the development at the site will be in accordance with national bodies including British Standards. The proposed lighting will be selected with reference to the following design standards and codes of practice:

- BS EN 13201-2: 2003 Road lighting – Part 2: Performance requirements;
- ILE GN01: Guidance notes for the reduction of obtrusive light;
- ILE TR12: Lighting of pedestrian crossings (2007); and
• ILE TR25: Lighting for traffic calming features.

12.16 Lighting will be designed in conjunction with the design team and landscape consultant to ensure that lighting is appropriate in terms of public realm and site surroundings. As such design measures can be secured through appropriate planning controls. It is considered that a detailed assessment of lighting is not required as part of the EIA.

Waste

12.17 Given the nature of the proposed development, materials required for the construction of the proposed development are unlikely to be particularly scarce or environmentally sensitive, nor is the proposed development likely to result in materials becoming scarce. Consideration will be given throughout the design process to the specification of suitable materials, including their sustainability and environmental implications, to support an environmentally sensitive and high quality development. As a result, the proposed development is not likely to have any significant effects in relation to materials.

12.18 Waste will be generated during the construction phase, as a result of the construction of the new buildings. Waste management will be considered carefully throughout the design and construction of the proposed development, to ensure compliance with legislation, and to minimise costs associated with waste disposal. The volume of construction waste likely to be generated by the development would be in line with what we would expect from a development of this size and will not significantly affect the capacity of local waste infrastructure.

12.19 The development will be designed to keep such cut or fill requirements to a minimum.

12.20 During the operation of the development, waste (including recyclables) generated by dwellings will be managed by the local waste authority. The proposed site users are not anticipated to be major generators of waste and the wastes generated by the proposed development should not significantly affect the capacity of local waste infrastructure.

Climate Change

12.21 Given the nature of the development in a city centre and sustainable location, impacts associated with flood risk, transport, emissions, air quality and dust impacts are not considered significant. Measures to deal with climate change adaptation such as measures to deal with global temperature rises, will be designed into the development and will be set out in the Design and Access Statement to be submitted with the planning application. These shall include suitable landscaping and public realm areas. Overall, topics which directly relate to climate change are not considered significant and a suitable design response will ensure that adaptation measures
and techniques are factored into the design of the scheme. As such, it is considered that climate change need not be assessed separately as part of this EIA.

**Human Health**

12.22 The EIA Regulations 2017 require that an ES considers the impact on human health of a proposed development. The nature of this proposed development is not considered to result in potential for direct health impacts to any nearby sensitive receptors (residents). Any potential disturbances during the construction phase, as a result of the proposed development that could give rise to indirect impacts on human health are expected to be mitigated appropriately by standard best practice measures that will be set out in a Construction Environmental Management Plan. As such, assessment of impact on human health is not proposed to be included as part of this EIA.

**TV Reception**

12.23 It is not anticipated that there will be significant impacts on telecommunications in the area as a result of the proposed development and a telecommunications assessment is scoped out of the ES.
13 PROPOSED STRUCTURE OF THE ENVIRONMENTAL STATEMENT

VOLUME 1: THE NON-TECHNICAL SUMMARY

13.1 A Non-Technical Summary is required under the 2017 EIA Regulations and presents the findings of the ES in a manner suitable for use by non-experts.

VOLUME 2: ENVIRONMENTAL STATEMENT

13.2 The Volume will contain the main text of the ES. The proposed topics for consideration and their respective chapter headings are set out below:

(1) Introduction
(2) Approach
(3) Site Description
(4) Alternatives
(5) The Proposed Development and Construction
(6) Planning Policy Context
(7) Townscape & Visual
(8) Heritage
(9) Ecology and Nature Conservation
(10) Wind Microclimate
(11) Daylight, Sunlight and Overshadowing
(12) Cumulative Impacts
(13) Summary of Mitigation and Residual Effects

VOLUME 3: APPENDICES

13.3 This volume will contain supporting information and a collection of technical reports upon which the conclusions of the ES are based.
14 SUMMARY AND CONCLUSIONS

14.1 The Scoping Report has been prepared to support a formal request to LBB for a Scoping Opinion under the 2017 EIA Regulations regarding the scope of the EIA and the likely content of the ES which will accompany the Planning Application.

14.2 The Scoping Report provides:

- An overview of the baseline environmental conditions;
- Details of the proposed development;
- An overview of the likely environmental issues associated with the development; and
- Methodologies proposed to undertake the specialist assessments.

14.3 We would welcome feedback on the proposed approach to the EIA and would be grateful if LBB would respond by way of a formal Scoping Opinion within the requisite 5 weeks in accordance with Regulation 15(4) of the 2017 EIA Regulations. If the Local Planning Authority requires any additional information in order to make a decision, please do not hesitate to contact HOW Planning.
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APPENDIX 1:  RED EDGE BOUNDARY PLAN
Glenn Howells Architects take no responsibility for the location of legal boundaries indicated on this drawing and advise a separate drawing to be completed by a specialist Surveyor in order to establish exact boundaries.
<table>
<thead>
<tr>
<th>PSC view no.</th>
<th>Location</th>
<th>Render / Wireline</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>AAP view 1 - Barn Hill, Wembley</td>
<td>W</td>
</tr>
<tr>
<td>2</td>
<td>AAP view 2 - Elmwood Park, Sudbury</td>
<td>W</td>
</tr>
<tr>
<td>3</td>
<td>AAP view 3 - Horsenden Hill, Perivale</td>
<td>W</td>
</tr>
<tr>
<td>4</td>
<td>AAP view 4 - One Tree Hill, Alperton</td>
<td>W</td>
</tr>
<tr>
<td>5</td>
<td>AAP view 5 - Welsh Harp Reservoir</td>
<td>W</td>
</tr>
<tr>
<td>6</td>
<td>Ealing Road, by Hindu Temple</td>
<td>W</td>
</tr>
</tbody>
</table>

Notes:

Viewpoint locations are approximate - exact locations, taking into account conditions on the ground, to be determined on site with PSC.

Approximate site boundary marked in red for indicative purposes only.

This page shows longer range views. For local views, refer to page 2.
<table>
<thead>
<tr>
<th>PSC view no.</th>
<th>Location</th>
<th>Render / Wireline</th>
</tr>
</thead>
<tbody>
<tr>
<td>7</td>
<td>High Road, Ealing Road junction</td>
<td>W</td>
</tr>
<tr>
<td>8</td>
<td>High Road, opposite Wembley Central Station</td>
<td>W</td>
</tr>
<tr>
<td>9</td>
<td>High Road, at Park Lane junction</td>
<td>R</td>
</tr>
<tr>
<td>10</td>
<td>Park Lane</td>
<td>W</td>
</tr>
<tr>
<td>11</td>
<td>Cecil Avenue, north</td>
<td>R</td>
</tr>
<tr>
<td>12</td>
<td>Cecil Avenue, south</td>
<td>W</td>
</tr>
<tr>
<td>13</td>
<td>Harrow Road, Wembley Hill Road junction</td>
<td>R</td>
</tr>
<tr>
<td>14</td>
<td>Wembley Stadium</td>
<td>R</td>
</tr>
<tr>
<td>15</td>
<td>Harrow Road, at Oakington Manor Drive junction</td>
<td>R</td>
</tr>
<tr>
<td>16</td>
<td>Harrow Road</td>
<td>W</td>
</tr>
</tbody>
</table>

Notes:
Viewpoint locations are approximate - exact locations, taking into account conditions on the ground, to be determined on site with PSC.
Approximate site boundary marked in red for indicative purposes only.