

Request for Screening Opinion

Town & Country Planning (Environmental Impact Assessment) Regulations 2017

Redevelopment of the Former Copland School site & Ujima House, Wembley, NW6 5QH

13th August 2018

1. Introduction

LB Brent (Regeneration Team) are working on the redevelopment of the former Copland School site and the Ujima House site. The proposed redevelopment of the sites involves The demolition of existing buildings and structures and the comprehensive redevelopment of both, the former Copland School and Ujima House sites to provide mixed use development including; 325 residential units (C3), community (D1/D2) and office/co-working floorspace (B1a, B1c) and associated hard and soft landscaping.

Brent Council are requested to provide a formal Screening Opinion for the proposed development pursuant to Regulation 6 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (the "EIA Regulations") in order to determine whether the proposed development constitutes Environmental Impact Assessment (EIA) development in accordance with the EIA Regulations.

2. Application Site and Surroundings

Both Application sites are located on opposite sides of Wembley High Road, in Wembley, North West London and comprise approximately 1.18ha of land in total (individually the total area of the Ujima House site is 0.36ha and Copland School Site is 0.82ha). The Ujima House site, sits to the north side of Wembley High Road and is bounded by a railway cutting to the North, for the National Rail mainline and office buildings to the West and East. The Copland School Site sits south of Wembley High Road. To the south, the site is bound by the site of the new secondary school, Brent House to the east and residential properties and 'London Wembley Hotel' along Cecil Avenue to the west.

The sites are located within a busy urban area; the high road forms an east-west spine between the two sites. Wembley Town Centre has been developed incrementally since the 1920's, although much of the current development along the high road is post-war architecture.

The current land use for Ujima House falls within Use Class D1 (non-residential educational and training facility), which was secured via a temporary change of use application in 2013. The Copland School Site is also within Class D1 (non-residential educational use) and comprises land formally occupied by the Ark Elvin Academy.

Neither site is located within a Conservation Area. There are no listed buildings on or adjacent to the site, however, there is one Grade II Listed Building, located approx. 200m away (Roman

Catholic Church of St Joseph) from both sites. There are also a number of mature trees around the perimeter of the site.

The PTAL rating for Ujima House is 6a, excellent and the PTAL rating for Copland School is 5, which is considered very good, based on the proximity to public transport and frequency of services. Wembley Stadium Rail station serves Chiltern Railways Overground Services and is approximately 390m away from both sites. Wembley Central Station serves a number of lines including London Overground services into Euston and out to Watford Junction, London Underground Services to Elephant and Castle and Harrow and Wealdstone and Southern Rail services to East Croydon and Milton Keynes Central. Wembley High Road is a major vehicular and pedestrian route and is served by 8 separate bus routes.

Currently, the main pedestrian access to Ujima House is via the main entrance at Ground Floor Level from Wembley High Road. There is also a service and secondary access to the rear where there is also a car park, which can be accessed by a controlled facility off Eccleston Place. There are currently, 42 car parking spaces provided at Ujima House.

The Copland School site currently fronts onto the High Road with vehicular access from the High Road and also Cecil Avenue.

3. Proposed Development

The proposed development for the site comprises:

“The demolition of existing buildings and structures and the comprehensive redevelopment of both, the former Copland School and Ujima House sites to provide mixed use development including; 325 residential units (C3), community (D1/D2) and office/co-working floorspace (B1a, B1c) and associated hard and soft landscaping.”

4. EIA development

EIA development is defined by regulation 2 of the EIA Regulations as development which is either Schedule 1 development or Schedule 2 development likely to have significant effects on the environment by virtue of factors such as size, nature or location.

Schedule 1 lists types of projects for which EIA is mandatory. These are generally industrial and infrastructure projects of large scale. The proposed development does not fall within this category.

Schedule 2 lists projects for which EIA may be required either if they are located within a “sensitive area” or if they exceed certain thresholds, usually reflecting their size.

Sensitive areas include SSSIs, national parks, World Heritage Sites, scheduled monuments, AONBs and sites designated under the European Habitats Regulations, 1994. The site is not located within any such areas.

Given the nature of the development proposed we consider the proposal should be classified as an urban development project within the description at paragraph 10(b) of Schedule 2 of the EIA Regulations. By virtue of the proposals included within this application, the development exceeds the threshold of “*more than 150 dwellings*”. We therefore consider the development proposal is Schedule 2 development within the meaning of the EIA Regulations.

In accordance with the EIA Regulations, Schedule 2 development should be reviewed against the criteria set out in Schedule 3 to determine whether it is likely to result in significant effects on the environment by virtue of:

- the characteristics of the development, in particular: its size; cumulation with other development; the use of natural resources; the production of waste, pollution and nuisances; and/or the risk of accidents;
- the location of the development in terms of the environmental sensitivity of the geographical areas likely to be affected by the proposed development, in particular: the existing land use; the relative abundance, quality and regenerative capacity of natural resources in the area; the absorption capacity of the natural environment paying particular attention to areas such as nature reserves and parks, and landscapes of historical, cultural or archaeological significance; and
- the characteristics of the potential impact – that is, considering the potential significant effects in relation to the characteristics and location of the development, and having regard in particular to: the extent of the impact; the transfrontier nature of the impact; the probability of the impact; and the duration, frequency and reversibility of the impact.

5. Characteristics of the Development

It is our view as expressed above that the size of the proposed development exceeds the threshold within Schedule 2 of the EIA Regulations for urban development projects. However, it is clear from Paragraph 18 of the Planning Practice Guidance that only a very small proportion of Schedule 2 development will require an EIA. The Planning Practice Guidance provides indicative screening thresholds to guide local authorities in decision-making on EIA Screening. For development falling within category 10(b), the guidance states the following:

Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination.

(Annex: Indicative Screening Thresholds - Planning Practice Guidance)

In our view the proposed development is comparable in scale to the existing and historic uses of the site and its impacts are not of a markedly different nature.

6. Location of the Development

The location of the development in terms of the environmental sensitivity of the application site and surrounding area likely to be affected by the proposed development is summarised in following table:

Topic	Comment
Archaeology	Ujima House is not located within an Archaeological Priority Zone. Copland School is designated as a Site of Archaeological Importance within LB Brent's Adopted Policies Map.
Heritage	Neither site is located within a Conservation Area. There is one Grade II Listed Building, located approx. 200m away (Roman Catholic Church of St Joseph).

Contaminated land, pollution and waste	There are existing buildings on both sites, which are all proposed to be demolished. As such it is determined that there is potential presence of contamination arising from the historical site usage, which is considered to pose a low to moderate risk.
Ecology	The Site does not form part of any statutory nature conservation site. The section of the railway sidings within the site form a section of the Chiltern Line between River Brent and Sudbury Hill Harrow Site of Importance for Nature Conservation (SINC). The Site is primarily dominated by buildings and hardstanding, with small areas of introduced shrub and scattered trees along the High Road and tall ruderal vegetation/scrub and semi-natural woodland along the railway sidings.
Flood risk and drainage	A Desktop Flood Risk Screening indicates that the site is located within Flood Zone 1 and is not considered to be at significant risk of flooding. The proposed uses are classified as 'More Vulnerable' in the National Planning Policy Framework (NPPF) Technical Guidance. In accordance with the Technical Guidance, and using the Sequential Approach, the proposed development is deemed to be compatible with this Flood Zone.
Trees	There are a number of mature trees both around the perimeter and within the interior of both sites, including one Category A tree to the North West corner of the former Copland School which is subject to a Tree Protection Order. Neither site is located within a Conservation Area.
Townscape and visual impact	Neither site is located within a Conservation Area. There are various existing buildings on the site, that are not considered to be of townscape value and as such are proposed to be demolished. The
Noise	The sites are located along the busy High Road and Ujima House backs onto a railway line to the North. In line with recommended guidance, mitigation measures will be recommended for the residential elements of the scheme.
Transport	Both sites are located along the High Road and have PTAL ratings of 6a (excellent) being located in close proximity to both Wembley Stadium and Wembley Central stations as well numerous bus routes.

The key issues for local planning authorities to consider in assessing a Screening Opinion for development within category 10(b) are set out in the Annex in the Planning Practice Guidance (e.g. physical scale of developments, potential increase in traffic, noise impacts). The relevant issues have been considered below in greater detail.

7. Characteristics of Potential Impacts

Taking into account the nature of the development and the environmental sensitivity of the site described in section 6 above, the following sources of potential impact may be identified:

- noise and dust during construction
- contamination;
- visual impact;
- impacts on ecology; and
- traffic and transport.

Noise and dust during construction:

Sensitive receptors to noise and dust include the residential properties and educational institutions in the vicinity of the site. The proposed development may impact the noise and air quality climate of these receptors during construction due to:

- noise and dust from demolition works;
- increased construction traffic activity (e.g. delivery of materials); and
- general construction works (e.g. hammering and piling).

These construction activities will be for a limited period of time and can be suitably managed through dust and noise control measures in a Construction and Logistics Plan (CLP) incorporating a Site Waste Management Plan to ensure major effects arising from noise and dust disturbances are minimised and appropriately mitigated.

Contamination:

A site investigation survey will be undertaken on both sites. This will include further survey work required to ascertain the possibility of unexploded ordnance on the site, further surveys to ascertain the presence of buried services and utilities, further survey work to ascertain the local of existing foundation structures and testing to ascertain any potential ground contamination and gas, including soil samples.

Visual Impact:

The visual impact of the proposed development on the townscape of the surrounding area will be addressed within the Design and Access Statement that will accompany the application. It is not assessed that the design proposals will have an undue impact on the surrounding area.

Impacts on trees:

There are a number of mature trees around the perimeter of both sites of varying categories, including a Category A tree located on the western corner of the Copland School Site, which is also covered by a Tree Protection Order.

An Arboricultural Survey will be carried out, which will identify mitigation measures to address any unavoidable impacts on existing trees, including strategies for replacement and new planting. This survey will be submitted in support of the planning application.

Impacts on ecology:

A Preliminary Ecological Appraisal has been undertaken on the site in support of this planning application.

The report confirms that the site does not form part of any statutory nature conservation site, however, the section of railway sidings within the site forms a section of the Chiltern Line between River Brent and Sudbury Hill Harrow Site of importance for Nature Conservation (SINC). As such, it is recommended that the scheme's layout and design should be developed using guidance by the Chartered Institute of Ecology and Environmental Management (2018). It is also recommended that a Construction Environmental Management Plan (CEMP) and a Landscape and Ecology Management Plan (LEMP) are completed prior to construction works.

Traffic and transport:

A Transport Assessment will be submitted in support of the planning application. This assessment will assess the potential impact of the proposed development in terms of traffic volumes, circulation on and around the site, and impacts on public transport infrastructure. It will propose mitigation measures to address any negative impacts, while Travel Plans will also be prepared in support of the planning application to outline measures to maximise the use of sustainable modes of transportation.

8. Conclusion

The table below evaluates the proposed development against the criteria set out in the Planning Practice Guidance's Annex to EIA setting out indicative screening thresholds:

Criterion	Comment
Is the development of a significantly greater scale than the previous use?	No. Whilst the sites are proposed to be developed at higher densities than the previous/existing uses, the impacts of development will not lead to environmentally significant effects.
Are the types of impact of a markedly different nature?	No. The impacts are similar in nature to the existing use.
Is there a high level of contamination?	It is assumed that there is not a high level of contamination due to the history of the site. A site investigation survey will be undertaken to demonstrate this.

Having taken account of the selection criteria in Schedule 3 to the EIA Regulations we consider that the proposed development is unlikely to give rise to significant effects on the environment.

We therefore conclude that the impacts of the development proposals are unlikely to be significant enough to justify an Environmental Statement. We would therefore request that Brent Council issue a screening opinion confirming the proposed development is not an EIA development within the meaning of the EIA Regulations.

The various studies undertaken to date and currently underway will be submitted as supporting information with the planning applications. Whilst these do not constitute an Environmental Statement, they will enable the potential effects of the proposed development to be identified and assessed. The applicants are willing to accept planning conditions to ensure the implementation of reasonable mitigation to avoid or minimise adverse effects.