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27<sup>th</sup> November 2018

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Dear Tibbalds,

**Environmental Impact Assessment Screening Opinion Town and Country Planning  
(Environmental Impact Assessment) Regulations 2017**

**Proposal:** Request for Screening Opinion as to whether an Environmental Impact Assessment is required for a proposed development of the demolition of all existing buildings and structures on the former Copland School and Ujima House sites and their comprehensive redevelopment to provide a mixed use development including 325 residential units, community and office/co-working floorspace and associated hard and soft landscaping.

**Site:** Land at Former Copland School site & Ujima House, High Road, Wembley, HA9 6AR

I write in connection to your screening request submitted on 19<sup>th</sup> November 2018 (mistakenly dated: 3<sup>th</sup> August). Reference has been made to Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations') "Requests for screening opinions of the relevant planning authority".

Upon review of the material supplied in association with the screening request from the applicant, plus other material that is mentioned in association with this screening opinion, the London Borough of Brent considers that the proposed development is not EIA development. As such it will not require an EIA to be undertaken to accompany any planning application for development described that incorporates the proposed mitigation measures to address potential adverse effects of the development as set out in this screening opinion.

As required by Regulation 6(6) of the EIA Regulations please find included the Council's Statement of Reasons which provides full reasons for this conclusion.

If you require any further assistance, please do not hesitate to contact Paul Lewin, on telephone 020 7937 6710 or email [paul.lewin@brent.gov.uk](mailto:paul.lewin@brent.gov.uk).

Yours sincerely,

**Paul Lewin**  
**Team Leader Planning Policy**

**EIA SCREENING OPINION STATEMENT OF REASONS**  
**The Town and Country Planning (Environmental Impact Assessment) Regulations**  
**2017**

**Reference number – 18/0202/PRE**

**Description of proposed development** - Request for Screening Opinion as to whether an Environmental Impact Assessment is required for a proposed development of the demolition of all existing buildings and structures on the former Copland School and Ujima House sites and their comprehensive redevelopment to provide a mixed use development including 325 residential units, community and office/co-working floorspace and associated hard and soft landscaping.

**Site** - Land at Former Copland School site & Ujima House, High Road, Wembley, HA9 6AR

*Notes - The assessment of the proposed development's likely significant effects is in relation to the EIA Regulations only. The assessment does not imply any consideration of the planning merits of the proposals or indicate the likely success or otherwise of an application for planning permission.*

**Introduction**

Tibbalds requested a screening opinion from London Borough of Brent (the Council) on 19<sup>th</sup> November 2018 (letter mistakenly dated 13<sup>th</sup> August 2018). Associated with this request details of the site boundary, proposed development and an initial assessment of the potential impacts of the proposed development were submitted.

**The Existing Site and Surrounding Area**

The development site consists of two pieces of land, Ujima House on the north of Wembley High Road, and the former Copland School site on the south side of Wembley High Road. Both sites front onto Wembley High Road, the section of which is fronted by Ujima House being included within the site plans. The site covers an area of approximately 1.18ha which is split between the two sites, Ujima House making up 0.36ha and Copland School contributing the remainder, 0.82ha. Ujima House is a 5 storey building falling within the Use Class B1a (office). The building is bound to the north by the railway tracks, to the east by a residential apartment block, and the west by an office block. Both neighbouring buildings are of similar scale and massing to the Ujima House building. The Former Copland School Site formerly comprised low density buildings of Use Class, D1 (non-residential educational and training facilities). These have now been demolished. This site is bound by a mixed use development currently under construction, predominantly of residential buildings up to 10 storeys on the former Brent House site to the east, to the south by the newly developed Ark Elvin school site and to the west by London Wembley Hotel and residential terrace housing along Cecil Avenue.

The site is within the Wembley Growth Area and is part of Wembley Central Town Centre with some of the surrounding buildings constituting part of the Town Centre Secondary Frontage. The railway tracks to the rear of Ujima House constitute part of a wildlife corridor and is designated as a Grade I Site of Interest for Nature Conservation (Chiltern Line BI06F). Part of the Former Copland School Site is within a Site of Archaeological Importance. There are a number of trees along the perimeter of the site on both Wembley High Road and Cecil Avenue, with one tree on the Former Copland School Site being subject to a Tree Protection Order. Wembley High Road has heavy vehicular movement being on the primary arterial roads within the area, with 8 bus services operating along the road. This helps provide the site with a strong PTAL of 6a with the addition of both Wembley Central Station which is serviced by a number of lines including London Overground lines to Euston and Watford

Junction, the Bakerloo line, and Southern Rail services to East Croydon and Milton Keynes Central. Chiltern Rail services are available at Wembley Stadium Station several minutes to the east.

The site makes up part of a site allocation identified by the council in the Wembley Area Action Plan (WAAP) in 2015 with the neighbouring Brent House. Brent House has since received planning permission for the erection of two buildings between eight and ten storeys in height to accommodate 248 residential dwellings with commercial floorspace on the ground floor and associated development to the public realm. The WAAP specifies for this site to include active commercial frontages on the ground floor in order to link up the surrounding town centre frontages.

### **The Size and Design of the Proposed Development**

It is not yet apparent at this stage as to the scale and massing of the proposed development of the demolition of all existing buildings on site and their comprehensive redevelopment to provide a mixed use development including 325 residential units, community and office/co-working floorspace and associated hard and soft landscaping. The site is a relatively large site of 1.18ha in a setting which has already been subjected to significant redevelopment including the approval of the redevelopment of the neighbouring Brent House site which is to be up to 10 storeys in height. For the purposes of this screening opinion, a similar height of development up to a maximum of 10 storeys is being assessed on both sites.

### **Information Provided in Support of the Request for a Screening Opinion**

The request for screening opinion has been submitted with a supporting statement setting out an analysis of the likely environmental effects of the proposal. This information has been utilised, as necessary, to inform this EIA Screening Opinion.

### **Previous History**

The site has no recent planning history particularly relevant to the development proposed that is subject to this screening opinion.

### **Large Scale Development within the Vicinity**

Within the vicinity there are currently the following applications for significant developments which have not yet commenced/ been completed to take account of when assessing the impact of the cumulative impact of the proposed development subject of this screening opinion in association with other developments:

15/4743 Brent House, 349-357 High Road, Wembley, HA9 6BZ 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 & 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. This is under construction with completion occurring in 2019/20.

15/4550 Chesterfield House, 9 Park Lane, Wembley, HA9 7RH 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. This is under construction with completion occurring in 2019/20.

16/4156 Heron House, 109-115 Wembley Hill Road, Wembley, HA9 8DA Demolition of the existing office building (Heron House) and the construction of a new four to seven storey mixed use building comprising 829sqm of commercial office space on the ground floor (Use class B1a), 40 self-contained flats (23 x 1bed, 7 x 2bed and 10 x 3bed) on the upper floors, a basement level for car and cycle parking, bin stores and associated landscaping and amenity space, subject to Deed of Agreement dated 24 May 2018 under Section 106 of Town and Country Planning Act 1990. No start on site.

15/4473 CAR PARK, Montrose Crescent & Land N/T 499 & 509 High Road, Wembley (including existing steps connecting to High Rd, Wembley with Station Grove), HA0 Proposed redevelopment of Montrose Crescent car park and land n/t 499 and 509 High Road, Wembley 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, Wembley 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. This is under construction and will be completed in 2019.

Wembley Quintain Masterplan 15/5550 Olympic Way and land between Fulton Road and South Way including Green Car Park, Wembley Retail Park, 1-11 Rutherford Way, 20-28 Fulton Road, Land south of Fulton Road opposite Stadium Retail Park, land opposite Wembley Hilton, land opposite London Design. 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;

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. Subject to a

Deed of Agreement dated 23 December 2016 under Section 106 of the Town and Country Planning Act 1990, as amended. Various elements completed and under construction for a period estimated to 2028.

14/4931 Land Surrounding Wembley Stadium Station, South Way, Wembley, A hybrid planning application, for the redevelopment of the site to provide seven mixed use buildings up to 19 storeys in height accommodating:

- outline planning permission for up to a total of 75,000sqm to 85,000sqm mixed floor space including
  - up to 67,000sqm of C3 residential accommodation (approximately 725 units);
  - 8,000sqm to 14,000sqm for additional C3 residential accommodation,
  - C1 hotel and/or sui generis student accommodation (an additional approximate 125 residential units;
  - or 200-250 bed hotel; or approximate 500 student units; or approximate 35 residential units and 200 bed hotel);
  - 1,500sqm to 3,000sqm for Classes B1/A1/A2/A3/A4/D1/D2;
  - together with associated open space and landscaping; car parking, cycle storage, pedestrian, cycle and vehicle access; associated highway works; improvements to rear access to Neeld Parade; and associated infrastructure
- 
- full planning permission for a basement beneath Plots SW03 - SW05 to accommodate 158 car parking spaces and 9 motor cycle spaces; Building 3A within Plot SW03 to accommodate 188 residential units and 150 cycle spaces; and associated infrastructure, landscaping, open space, vehicular access and servicing and subject to a Deed of Agreement dated 23 December 2016 under Section 106 of the Town and Country Planning Act 1990, as amended. Hotel completed and residential currently under construction, estimated completion dates 2019-2028.

14/4714 MAHATMA GANDHI HOUSE, 34 Wembley Hill Road, Wembley, HA9 8AD.

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, 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. Under construction, estimated completion 2019/20

16/1698 Flats 1-4 INC, First Floor Front and Cottrell House, 53-63 Wembley Hill Road, Wembley, HA9 8DL Demolition of the existing mixed use building and erection of a part 6, 8 and 10 storey building comprising 55 residential units, with 2 commercial units (Use class A1) located over ground and mezzanine floors fronting Wembley Hill Rd, and associated car and cycle parking spaces, bin stores, landscaping and amenity space, subject to a Deed of Agreement dated 05/05/2017 under Section 106 of the Town and Country Planning Act 1990, as amended. Under construction, estimated completion 2019/20.

18/2197 York House, Empire Way, Wembley, HA9 0PA, Prior approval for change of use of part ground, 4th to 8th floors, part of the 9th floor and 10th to 15<sup>th</sup> floors from office (Use Class B1) to residential (Use Class C3) involving the creation of 305 residential units (277 studio flats, 12 x 1-bed, 1-person flats and 16 x 1-bed, 2-person flats). Estimated completion 2020/21.

## Other Environmental Assessments

Regulation 5(5)(b) of the EIA Regulations requires the relevant planning authority to take into account the results of any relevant EU environmental assessments.

### Current Local Plan

The current Brent Local Plan consists of the Core Strategy (2010), Site Specific Allocations (2011), Wembley Area Action Plan (2015) and Development Management Policies (2016) Local Plans and the West London Waste Plan (2015). Together these documents provide spatial policies, development management policies and site allocations to guide and manage development in the borough.

Sustainability Appraisals (SA) for all these Local Plan documents were undertaken. The SAs satisfied the requirements of the EC Directive 2001/42/EC and Strategic Environmental Assessment (SEA) Regulations on the assessment of the effects of certain plans and programmes on the environment.

These documents have been referred to when generating the EIA Screening Opinion.

### Local Plan to 2041

It is noted that the Council is currently consulting on their new Local Plan. This round of consultation (known as the regulation 18 stage) represents the early stages of comment on the content of the plan and how it has been prepared. The Council intend to submit the Plan to the Secretary of State for examination in 2019. Once adopted, this document will be the key strategic document to guide and manage development in the borough until 2041. An Integrated Impact Assessment (IIA) will accompany the new Local Plan, which incorporates the SA and SEA – that consider the potential for significant economic, social and environmental effects. This document has been considered when generating the EIA Screening Opinion.

## Legislation

The proposed development does not fall within any of the descriptions of development listed in Schedule 1 of the EIA Regulations, and is therefore not a 'Schedule 1 development'. The development does, however, fall within the description of a Schedule 2 development, classified under item 10 (b) as 'urban development projects'.

'Schedule 2 development' means development (other than exempt development – which this is not) of a description mentioned in Column 1 of the table in Schedule 2 where:

- a) any part of that development is to be carried out in a sensitive area; or
- b) any applicable threshold or criterion in the corresponding part of Column 2 of that table is respectively exceeded or met in relation to that development.

No part of the proposed development is to be carried out in a 'sensitive area' as defined by the EIA Regulations.

The threshold for item 10(b) is as follows:

- (i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or
- (ii) the development includes more than 150 dwellings; or
- (iii) the overall area of the development exceeds 5 hectares.

The proposed development is for approximately 325 residential units, with the addition of commercial floorspace. As such, it exceeds the threshold for 150 dwellings, and therefore the proposed development therefore constitutes 'Schedule 2 development'.

Consideration must therefore be given to whether the proposed development may give rise to significant environmental effects, such that an EIA may be required.

#### Likely Significant Effects

The ultimate stage in the screening process is to consider whether it is '*likely to have significant effects on the environment by virtue of factors such as nature, size or location*'. As required by regulation 5(4)(c), where a relevant planning authority has to decide whether Schedule 2 development is EIA development, they must take into account the selection criteria set out in Schedule 3 as are relevant to the development.

The Council has taken into account the selection criteria set out in Schedule 3, where relevant to the proposed development. This includes the characteristics of the development, the environmental sensitivity of geographical areas likely to be affected, and the likely significant effects in relation to these criteria, with regard to the factors specified in regulation 4(2) and taking into account the types and characteristics of the potential impact listed in paragraph 3.

In addition, as required by regulation 5(5)(a), where the relevant planning authority adopts an EIA Screening Opinion they must state the main reasons for their conclusion with reference to the relevant criteria listed in Schedule 3. Within this Statement of Reasons, the Council has stated the main reasons for their conclusion, referencing the relevant criteria listed in Schedule 3 as appropriate.

The Council has concluded that the proposed development does not require an EIA to be undertaken to accompany a planning application for the proposed development as the proposed development is not likely to generate significant environmental effects – Appendix A (below) sets out the reasoning for this decision.

## **Appendix A – Consideration of Likely Significant Effects**

### **Air Quality**

The site is located within the Brent Air Quality Management Area (AQMA). The majority of Brent has been designated as an AQMA, and therefore even small increases in emissions can lead to adverse effects. The AQMA has been declared for exceedance of the annual mean national objective for nitrogen dioxide (NO<sub>2</sub>) and the 24 hour mean national objective for particulate matter (PM<sub>10</sub>).

There are a number of sensitive receptors in close proximity to the proposed development site, including the residential properties and businesses.

*Documentation Accompanying the Planning Application:* It is anticipated that an Air Quality Assessment, as informed by a Transport Assessment will be submitted with the application.

### **Construction**

Machinery used during construction can generate new sources of emissions, as well as traffic movements to/from the site and the works themselves. When assessing the effect of dust emissions generated during construction works, receptors are defined as the nearest potentially sensitive receptor to the boundary of the site in each direction. These receptors have the potential to experience effects of greater magnitude due to emissions of particulate matter generated by the works, when compared with more distant receptors.

The receptors in close proximity to the site, combined with the new emissions, means that there is the potential for adverse effects as a result of the construction proposed development.

Whilst there is the potential for adverse effects, with the implementation of standard best practice measures, it is not anticipated that the effects would be significant. Taking account of these practices the effect of dust soiling and PM<sub>10</sub> is likely to be reduced to negligible with the implementation of appropriate mitigation measures. These may include: No idling vehicles; Erect solid screens or barriers around dusty activities or the Site's boundary; Loads entering and exiting the Site are covered; Where practicable use mains or battery powered generators over fuel burning; Other dust suppression measures e.g. damping down with water; and all constructions vehicles and equipment to comply with relevant EU stage ratings. These standard mitigation measures can be implemented through a construction environmental management plan (CEMP), which can be secured through a standard planning condition.

As such, whilst there is the potential for adverse effects as a result of the proposed construction, with the implementation of standard mitigation measures, it is not anticipated that the effects would be significant.

### **Operation**

Air quality emissions during operation will be from new traffic generation, heating systems and potentially operation of the businesses related to the commercial floorspace proposed. Consideration also needs to be given to the potential effects on the new internal receptors given the location for the proposed development adjacent to a relatively heavy trafficked road. The Council is likely to seek technical reports that show how an air quality neutral, or potentially depending on timing of an application, an air quality positive development can be achieved.

As the site is within a PTAL 6a area, consistent with recent adjacent residential developments it is likely that very limited on site car parking will be provided on site and this will be principally focused on disabled parking provision. Lower levels of provision in relation to the commercial uses are also anticipated. This reflects the site's accessible location in terms of travel by foot, cycle and public transport. Parking controls exist in the vicinity of the development and are likely to be increased in the surrounding area further afield to deal with potential displacement off-site. This, along with measures to support walking, cycling and public transport is likely to reduce private car use. Taking this into account the level of net traffic generation resulting from this development is likely to be negligible. As such emissions from vehicle movements will be minimal, and therefore effects are not considered to be significant.

It is not clear how the development will be heated, it is assumed that this will be by gas powered boilers. Any such system is likely to adequately disperse fumes through a suitably designed flue system and therefore the impact on local air quality will be negligible. As such significant effects are not considered to be likely. Given the proximity of commercial to residential it is assumed that occupiers are unlikely to undertake activities that will generate potentially significant impacts on air quality. Such uses would be subject to environmental health legislation.

Consideration also needs to be given to the potential effects on the new internal receptors given the location for the proposed development adjacent to a relatively heavily trafficked road and the site being within an AQMA.

#### Mitigation

The Council is likely to seek an air quality neutral development. During the construction phase a CEMP should be implemented which implements suitable measures to reduce the impact of dust and emissions. This can be secured via a planning conditions.

The developer should consider the potential impact of air quality and dust on occupational exposure standards (to minimise worker exposure) and breaches of air quality objectives that may occur outside the site boundary. Continuous visual assessment of the site should be undertaken and a complaints log maintained in order to determine the origin of a particular dust nuisance.

For the operational phase suitable mitigation to be secured through a planning condition to ensure that new internal receptors are adequately protected.

In addition suitable conditions associated with the Travel Assessment including Travel Plan and measures to reduce reliance on the private car, for example through provision of sufficient cycle parking and potential S106 contributions to implementing a wider controlled parking zone will ensure reductions in impact through vehicle movements.

#### Local Heritage

*Documentation Accompanying the Planning Application:* A design and access statement will identify the extent of local heritage and cultural assets and how the design of the development has responded to these. In addition a views assessment will identify the extent to which the development impacts on skyline and protected views. Due to the presence of a Site of Archaeological Importance it will therefore be required for the application to be submitted alongside an Archaeological Impact Assessment.

The closest feature is the Grade II Listed Roman Catholic Church of St. Joseph which is approximately 200 metres to the south east of the site. The Site does not lie within or near a

Conservation Area, however, does contain within its perimeter a Site of Archaeological Importance. There are a further 57 Listed Buildings within 1.5km of the site. King Edward VII Park which is locally listed is the closest Registered Park and Garden to the site, located 400 metres to the north east.

The section of the site which was formerly occupied by Copland School contains within its perimeter a Site of Archaeological Importance (as defined on the Brent Local Plan proposals map) and will may impact on the setting of features of historic or cultural importance. It is not considered to warrant the submission of an EIA. An archaeological assessment for the site was undertaken and highlighted the potential for Late Saxon or medieval remains to be present on that site together with a house (Wembley House) and farm (Dairy Farm) of Post Medieval date. It will therefore be appropriate to undertake an Archaeological Impact Assessment to examine the potential for archaeological remains on the site.

The impact of the scale and height of the proposed buildings through the design and access statement and views assessment will allow sufficient clarity of impact on the setting of features of historic or cultural importance. The separation distance between the site and designated heritage assets means that significant impacts are not anticipated.

The Council considers that given the scale of the development and the urban nature of its location the proposed development would not lead to significant adverse environmental effects on heritage assets, as such EIA is not required in respect of heritage and cultural impacts.

### **Climatic Factors**

*Documentation Accompanying the Planning Application:* An Energy Report should be submitted with the planning application.

#### Construction

Emissions from construction traffic and plant can contribute towards the region's greenhouse gas emissions. Due to the size of the proposed development the emissions are not considered to be substantial, and therefore no significant effects are anticipated. It is advised that sustainable methods of working should be implemented to reduce any emissions, and should be implemented as part of the CEMP.

#### Operation

It is considered that the proposed development will be able to achieve the necessary carbon reduction targets, through actual reductions combined with financial contributions. The effects of which are beneficial, but are not considered to be significant.

#### Mitigation

A CEMP should be secured that includes measures to reduce emissions e.g. management of plant to prevent plant running when not in use.

The S106 will need to be worded to ensure that any required carbon reduction off-set payments are secured.

Taking account of the above the Council does not consider that the environmental impacts related to climate change are significant enough to warrant EIA.

## **Contaminated Land**

### Documentation Accompanying the Planning Application

A Phase 1 ground conditions survey should be submitted with the application. This will assess the potential effects of the proposed development and if necessary the need for further ground investigations to support a remediation strategy report with mitigation measures to deal with any residual effects.

Parts of the site are within a historically industrial area and has been used for industrial purposes for some time. As such there is the potential for sources of contamination related to its and the surrounding land uses.

### Construction

During construction there is considered to be a low likelihood of fuel leakages / spills from construction vehicles. A CEMP would be implemented to manage potential effects. In addition there is the risk of exposure to contaminated materials and opening up pathways to underlying substrata. Standard mitigation measures will be required during the construction of the proposed development, to ensure that the works are undertaken in an appropriate manner. These should be secured through conditions in agreement with the Council's Contaminated Land Officer.

With the implementation of these mitigation measures, no significant effects are considered likely.

### Operation

With the implementation of any required impact avoidance measures as part of the construction phase, no significant effects are anticipated at operation.

### Mitigation

Standard construction mitigation measures should be secured through the CEMP and through conditions in agreement with the Council's Contaminated Land Officer.

Taking into account the above the contamination issues are not so significant as to warrant and EIA.

## **Daylight, Sunlight and Overshadowing**

There are a number of sensitive receptors in close proximity to the proposed development site, including residential properties, businesses and the school.

*Documentation Accompanying the Planning Application:* A Daylight and Sunlight Report should be submitted with the application.

### Construction

During construction, there will be a change in the provision of daylight/sunlight due to the construction equipment (i.e. cranes) and the erection of the new buildings.

The construction equipment will be temporary and short-term, and therefore not considered to be significant.

The erection of the new buildings will generate some adverse effects as they are built out. The construction effects will however be no greater than the completed, operational development, which are not considered to be significant.

#### Operation

The intended scale and massing of the building have not yet been disclosed in the information submitted with the screening opinion. As such a height of a maximum of 10 storeys has been assumed for the proposed development. Due to the proximity of nearby sensitive receptors and the combined influence of the surrounding structures overlooking the High Road there is the potential for the proposed development to affect surrounding receptors to the west, east and north. Some properties may be adversely affected by the proposed development, however given the number of receptors and the site's urban location, the effects are not considered to be significant.

With respect to onsite receptors the building will sit within a context where tall buildings are prevalent in close proximity which could impact upon sunlight and daylight available to the development. Whilst this might impact on some receptors significant effects are not considered to be likely.

#### Mitigation

No discipline specific mitigation has been relied upon for the EIA Screening Opinion.

Taking account of the above it is considered that the environmental impacts in relation to daylight, sunlight and overshadowing would not be so significant to warrant EIA.

#### **Biodiversity (including flora and fauna)**

*Documentation Accompanying the Planning Application:* A Phase 1 ecology and bat survey should be submitted in association with the application. In addition a tree survey to take account of the existing trees on the northern edges of the site (including the tree subject to TPO) should be submitted.

The site contains no areas of statutory nature conservation and there are no such sites within the immediate vicinity of the Site. There are no SPA, SAC or Ramsar designations within 5km of the Site. The nearest Local Nature Reserve (LNR) is Fryent Country Park located 2.2km north of the site. Brent Reservoir/Welsh Harp LNR is located 2.8km west of the site. The closest Special Area of Conservation (SAC) is Richmond Park, located 11km south of the site. The closest National Nature Reserve is Ruislip Woods which is located 10km north-west of the site. The nearest AONB is the Chilterns AONB, located 18.2km north-west of the site. The South West London Waterbodies is the closest Ramsar Site and SPA to the site, located 17.5km south-west.

There are no environmental pathways such as water courses through which the Proposal could adversely affect these protected areas. It is not considered that the proposed development will have a significant effect on the integrity of statutory or non-statutory nature conservation designations or protected species and the potential for conservation requirements and objectives would not be diminished.

The development site appears to have limited on site ecological assets, essentially in terms of green infrastructure predominantly consisting some mature/ semi mature trees, one of which is subject to a Tree Protection Order around its perimeter together with incidental planting. It however does encroach into and is immediately adjacent to the railway land to the north of the site which constitutes a Wildlife Corridor which is designated as a Grade II

Site of Interest for Nature Conservation (SINC). This site provides an essential pathway for flora and fauna which enables their populations to remain stable and viable in the surrounding areas, connecting larger sites which harbour more biodiversity due to the presence of corridors and SINC's such as these.

#### Construction

Depending on the findings of the Phase 1 Ecology and bat survey a range of standard mitigation measures may be required to reduce potential adverse impacts on biodiversity, such as timing of demolition/ construction activities, relocation of bats and controls on lighting. In addition in relation to any trees that will remain on site, appropriate root-protection areas will be required.

#### Operation

There is the potential for the proposed development to beneficially contribute to biodiversity of the local area through the implementation of ecological enhancement measures e.g. inclusion of bat roosting opportunities, bird boxes, green roofs and a wider range of green infrastructure on site that encourages bio-diversity. Whilst this is considered to be beneficial, this is not considered to be significant.

#### Mitigation

Suitable conditions should be in place to ensure potential adverse impacts on any existing protected species are minimised during prior to and during works on site, as well as incorporation of suitable features to encourage bio-diversity resources as part of the development.

Taking account of the above no significant environmental effects should arise which would require the need for an EIA.

#### **Flood Risk**

The site is over 1 hectare in size, so will be subject to a site specific flood risk assessment (FRA), which will take into account all aspects of potential flooding and how the development can ensure that an unacceptable risk is not caused on and off the site.

#### Construction

Given that the site is outside Flood Zone 3, in the construction process there is considered to be limited risk to property and people.

#### Operation

The FRA and drainage strategy will seek to ensure that the proposed development will not increase flood risk to occupants and off-site. In addition it is likely that the site will reduce surface water run-off to greenfield rates through a series of measures such as green roofs/ on site storage.

#### Mitigation

The development will be located and designed so not to increase risk of flooding. Implementation and management of surface water run-off should be secured through a planning condition.

Taking account of these matters it is considered that the development will not have significant effects that warrant the need for EIA.

### **Human Health**

It is considered that human health (both of existing and new receptors) has been appropriately considered within the relevant topic sections (e.g. water contamination or air pollution) and as such, reference should be made to these sections as required.

### **Land (land take)**

The construction and operation of the proposed development will utilise brownfield land to provide commercial space and residential dwellings. This is not considered to generate any significant effects. No discipline specific mitigation has been relied upon for the EIA Screening Opinion.

### **Material Assets**

The construction and operation of the proposed development will utilise material assets, but given the scale of the development this is not considered to be substantial. As such, significant effects are not considered to be likely. No discipline specific mitigation has been relied upon for the EIA Screening Opinion.

### **Major accidents and/or disasters**

It is considered that the risk from major accidents and/or disasters (both of existing and new receptors) has been appropriately considered within the relevant topic sections (e.g. climate change, flood risk) and as such reference should be made to these sections as required.

### **Noise and Vibration**

Documentation Accompanying the Planning Application

A Noise Assessment will need to be submitted with the application. Background noise levels on the site, and in this part of the Borough, are principally characterised by road traffic and train noise. During the day it is anticipated that the school to the rear of the site may provide an additional source of potential noise.

Construction

Machinery used during demolition/construction on site can generate new sources of noise, as well as construction traffic movements in the vicinity. The nearby receptors combined with the new noise emissions, means that there is the potential for adverse effects as a result of construction activities.

Given the scale of the development, standard impact avoidance measures can be implemented to reduce emissions from construction activities, which will be secured through the CEMP. In the context of traffic movements around the site, the level of construction vehicle movements will not be exceptional. No significant effects are therefore anticipated.

Operation

With the exception of disabled parking, it is likely limited general car parking will be provided as part of the development scheme. There are likely to be deliveries to residents and

commercial properties as well as waste removal, but in an urban context the impacts will be limited. As such, there is not considered to be any significant effects from traffic noise.

The proposed commercial and residential use is not considered to be inherently noisy. Some noise may be generated from the operation of mechanical plant and building services, but plant noise emissions will be required to meet local policy requirements and British Standards. Adherence to these values will ensure that new and existing receptors are not adversely affected, and will ensure that there will be no significant effects.

There is the potential for new residents to be affected by adverse noise due to the site's location. The Noise Assessment will consider how new residents can be protected through the appropriate design of the proposed development. The proposed development can therefore be designed with consideration to the location of the development and the potential noise implications – secured through planning conditions.

No significant effects are therefore anticipated.

### Mitigation

Adherence to the CEMP should be secured through a planning condition, the CEMP will include standard mitigation measures to reduce noise emissions. Plant noise should be controlled to local and national guidelines using a planning condition.

Suitable mitigation will be required to be included within the design of the proposed development to ensure that new internal receptors are adequately protected. This might be through specifications on glazing, acoustic trickle vents, air bricks or mechanical ventilators, in order to reduce noise ingress but provide adequate ventilation to the standards.

Taking account of these matters it is considered that the development will not have significant effects that warrant the need for EIA.

### **Socio-Economic (including population)**

#### Documentation Accompanying the Planning Application

The planning statement might give an indication of current land use and number of jobs within the site and compare this with what is proposed.

#### Construction

The proposed development would create benefits to local employment though providing temporary employment during construction. This is considered to be beneficial, but not significant.

#### Operation

The proposed development would create benefits to local employment though providing permanent employment once operational. In addition approximately 1 in 12 people work from home, so the development will provide space for occupants to do this. The development will provide housing to meet the borough's identified needs, including affordable housing. This is considered beneficial but not significant.

The development will increase demand for local social infrastructure. Community Infrastructure Levy (CIL) payments will be sought to offset the effects of the development.

These financial contributions will mitigate adverse effects, so that significant effects are unlikely.

#### Mitigation

Financial contributions through CIL will be sought to mitigate the effects of increased population/ users.

Taking account of these matters it is considered that the development will not have significant effects that warrant the need for EIA.

### **Soil (organic matter, erosion, compaction, sealing)**

#### Construction

There is the potential for some loss of organic matter, erosion, compaction and sealing during the demolition/construction phase; however, given the scale of the development and the length of the demolition/construction phase, effects are not considered to be significant.

#### Operation

The operation of the completed development is not anticipated to affect organic matter, erosion, compaction and sealing. As such, significant effects are not considered to be likely.

#### Mitigation

The implementation of a CEMP during the construction phase will ensure that standard mitigation measures are implemented.

### **Telecommunications**

The height of the taller buildings may impact on the quality of television reception in the near locality, but on the basis of information provided with other sites in the vicinity the impact is not considered to be significant.

It is considered that there is no known significant likelihood at this stage, of detrimental effects from or on telecommunications that would warrant the submission of an EIA.

### **Townscape and Visual Impact**

#### Documentation Accompanying the Planning Application

A Townscape/ Visual Impact Analysis will identify the extent to which the development impacts on the skyline.

#### Construction

The construction works are likely to require large cranes/ equipment, and therefore there is the potential for adverse effects on views and townscape. That said, given the relatively short term, temporary nature of the construction works and the scale of the development, effects are not considered likely to be significant. Supplementary mitigation can be implemented through the use of hoarding, to provide a physical/visual barrier to the works.

## Operation

The proposed use will represent an increase in intensification upon the sites previous uses, seeing as it will accommodate approximately 325 residential dwellings with the addition of commercial floorspace. The context within which it sits however currently includes buildings which will likely be of a similar scale and massing to the proposed development within the near vicinity. This includes buildings currently present and the approved development of the Ex Brent House which will rise to 10 storeys in height. Although the scale of the proposed development has not been disclosed it is anticipated to be a maximum of 10 storeys in height, thus similar to buildings already existing or under construction. The development is likely to reduce in scale in those areas where it is anticipated that existing development will remain, or where a lower scale of development is likely to be considered appropriate in the future. EIA submitted with the former Chesterfield House application found no significant adverse impacts related to the height of that development on townscape and visual impact. As such, the Council considers that although there is the potential for the proposed development to lead to some adverse effects on townscape and views, given the scale of the development and the urban nature of its location, significant effects are not considered likely.

## Mitigation

During construction, ensure the erection and maintenance of hoarding. Design, height and massing to reduce potential for adverse impact.

Taking account of these matters it is considered that the development will not have significant environmental effects that warrant the need for EIA.

## Traffic and Transport

*Documentation Accompanying the Planning Application:* A Transport Assessment will be submitted with the planning application. The site is located within an area with a public transport accessibility level (PTAL) of 6a. As such it has excellent public transport accessibility and is in an area where the Council will seek to limit on site car parking provision with aims of being car free.

## Construction

There will be an increase in the number of vehicles accessing the site during the construction phase, however, given the scale of the development the anticipated numbers are not considered to be substantial. It is considered that any adverse effects can be mitigated through a construction logistics plan (CLP) (potentially included as part of the CEMP) to control transport movements.

With the implementation of standard mitigation measures, no significant effects are anticipated.

## Operation

The Transport Assessment will set out how the site would be serviced when operational, which is consistent with an approach agreed with the local highway authority. Due to the proposed limited on site car parking provision operational traffic effects of the proposals are likely to be negligible when placed within the context of the site's existing use. Increased numbers of movements related to deliveries could generate additional traffic over current levels. However, given the scale of the development, these effects are not considered to be significant. The lack of on-site car parking and lack of residents' controlled parking zone in

the area will mean that suitable controls on residents potential to own/ park cars on site and in the vicinity will be expected, this is likely to include restrictions within property leases as well as financial payments towards a local parking permit scheme, which will help to mitigate any adverse effects.

#### Mitigation

A CLP should be secured that includes standard mitigation measures to control transport movements.

Controls on occupants and financial payments should be sought to offset operational effects.

As such no significant environment effects are anticipated to require EIA.

#### **Waste**

##### Documentation Accompanying the Planning Application

A CEMP will be sought as part of the planning process to deal with demolition and construction waste matters. A Waste Management Strategy or similar type of analysis of within the planning statement of how the development will adequately cater for the storage and collection of domestic and commercial waste during its operation will be sought.

##### Construction

The site will generate waste, principally building materials during the demolition and construction stages. The management of construction waste is covered by the Waste Duty of Care Legislation (2016), issued under section 34 of the Environmental Protection Act 1990. The implementation of standard impact avoidance measures will reduce waste from construction activities, which can be secured through the CEMP. No significant effects are therefore anticipated.

##### Operation

Separate solutions will be provided for both the commercial and residential elements of the development. The inclusion of suitable waste facilities for residents is covered under part H6 of the Building Regulations, and to ensure this, inclusion of separate facilities for general waste, recycling and organic materials is normally assessed for capacity and suitability as part of the normal planning process with reference to the 2015 Brent Council guidance. Commercial waste is covered under the same legislation as construction waste, above.

The decision notice should include suitable conditions to ensure that waste facilities for residents and businesses are provided prior to occupation. No significant effects are anticipated.

##### Mitigation

Adherence to the CEMP which will include standard mitigation measures should be secured through a planning condition for construction phase, as well as one that seeks to ensure sufficient space and practises to ensure adequate measures for waste management are in place prior to and during occupation.

#### **Water Quality (hydromorphological changes, quantity and quality)**

##### Documentation Accompanying the Planning Application.

This matter will be addressed in a number of areas including the Contaminated Study and the CEMP that will be required as part of the application/ permission process.

The site is adjacent to a SINC, with development potentially incurring run-off direct from the site via non-formal pathways, or potentially via the surface water drainage network. In addition the site has historic industrial use with potential for various compounds that could adversely affect water quality such as hydrocarbons within the ground if disturbed. The site however, is not located within or close to a groundwater Source Protection Zone.

### Construction

The implementation of standard impact avoidance measures should be secured through the CEMP. In addition the potential of contamination on site could result in pathways either above or below ground being created that lead to watercourses, for example through piled foundations. This will require measures to avoid such potential. With the implementation of standard impact avoidance measures to ensure that the site is adequately protected, no significant effects are anticipated. It is not considered, given the scale of the development and works proposed that there will be any significant effects on either water quantity or hydromorphology during construction.

### Operation

There is the potential for the operation of the proposed development to affect the foul and surface water capacity/ quantity due to an increased demand. Whilst there may be an increase in demand, given the scale of the development, it is not considered to lead to significant effects. There is the potential for pollutants originating from motor vehicles to enter the surface water and ground water systems. Such risk can be mitigated through the inclusion of pollution control measures in surface water drainage systems, which can be secured by condition. It is not considered, given the scale of the development and the implementation of SuDS (refer to Floor Risk section above) that there will be any significant effects on either water quality or hydromorphology once operational.

### Mitigation

A CEMP should be secured that includes measures to protect against and deal with accidental pollution events. The Contaminated Land Report will identify if and where contamination is present and measures required to ensure that any construction activity does not increase risk to water quality will be secured through planning condition. The implementation and management of SuDS and associated pollution control mechanisms for surface drainage should be secured through a planning condition.

As such it is not anticipated that the environmental effects will be of such significance to warrant EIA

### **Wind**

*Documentation Accompanying the Planning Application:* A Wind Impact Assessment should be submitted with the application.

### Construction

It is recognised that throughout the demolition and construction phase of the project, the cranes and the erection of the new structure may affect the local wind microclimate, however these effects are considered to be temporary and not anticipated to be significant.

### Operation

The operation of the proposed development will introduce new tall buildings onto the site. Therefore there may be adverse effects on the existing wind conditions, particularly along the High Road. This can be assessed throughout the normal planning process taking account of the Wind Impact Assessment. Mitigation measures should be incorporated into the development to reduce the impacts on those within and adjacent to the development to acceptable levels.

As such it is not anticipated that the environmental effects will be of such significance to warrant EIA.

### **Cumulative Effects**

The 2017 EIA Regulations requires the consideration of cumulative effects through interactions being the combined effects of individual effects arising as a result of the development and also with other existing development and/or approved development.

In relation to the cumulative effects of the interactions related to the proposed development, taking account of the analysis and commentary above it is not considered that the impacts are such as to be so significant to warrant EIA.

There are a number of major developments in the surrounding area that are likely to be built, as detailed in 'Large Scale Development within the Vicinity'. The proposal in association with these wider developments may have the potential for cumulative impacts. The impacts of this needs to be considered when determining if the effects would be so significant as to warrant EIA.

The Council has considered a wide area consisting of other development sites adjacent or within the vicinity, particularly those within the Wembley Growth Area or that might generate transport movements along Wembley High Road. It has also taken into account the information contained within Environmental Statements submitted in association with applications that were considered to be EIA development by the Council or applicant. In relation to the issues that have the potential to cause harm, the inclusion of appropriate mitigation strategies resulted in these developments being identified as not causing significant harm.

### Demolition/Construction

It is considered that no likely significant adverse cumulative construction effects will occur assuming the implementation of standard mitigation measures such as appropriate traffic management measures and construction routing; and maintenance of site hoardings and compliance with the mitigation measures detailed within the CEMP.

It is also assumed that the enabling works, demolition and construction phases associated with the other development schemes would adhere to legislative requirements, industry guidance and best practice as will be the case within the application sites. However, there remains the potential for cumulative effects to arise, particularly with respect to dust and noise.

The construction workers at the construction site of each individual cumulative scheme will have to adopt controls to prevent the significant transfer of airborne pollutants beyond their site boundaries and the use of monitoring to confirm the effectiveness of these measures. Therefore, cumulative effects at existing and future receptor locations would be appropriately managed by the contractors to avoid the occurrence of significant adverse cumulative effects. Cumulative effects during the enabling works, demolition and construction phase are therefore generally considered to be temporary, local and overall not significant.

### Operation

With regards to the matters considered in this opinion it is not considered that there will be significant adverse cumulative operational effects when the cumulative developments and the proposed development are operational. The limited on site provision of parking, will

ensure the majority of sites will not generate greater numbers of vehicle trips than currently exist.

It is anticipated that CIL and S106 and other funding streams from Government and service providers will address capacity issues that might exist in relation to on and off-site infrastructure.