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25<sup>nd</sup> February 2019

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Dear Sir/Madam,

**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 demolition of existing buildings and erection of a development of up to 26-storeys comprising five blocks, three of 11 storeys, one up to 16 storeys, and a fifth up to 26 storeys. The ground floor will be a podium which unites the 5 blocks under one development which will comprise flexible commercial use (approximately 1,600 sqm), with the 5 blocks providing residential units on the upper floors (approximately 460 dwellings), and associated car parking, amenity space and landscaping.

**Site:** Land at Wembley Park Station car park, Brook Avenue

I write in connection to your screening request submitted on 12<sup>th</sup> February 2019. 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 attached 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** – 18/0150/PRE (EIA Screening)

**Description of proposed development** – Request for Screening Opinion as to whether an Environmental Impact Assessment is required for a proposed development of demolition of existing buildings and erection of a development of up to 26-storeys comprising five blocks, three of 11 storeys, one up to 16 storeys, and a fifth up to 26 storeys. The ground floor will be a podium which unites the 5 blocks under one development which will comprise flexible commercial use (approximately 1,600 sqm), with the 5 blocks providing residential units on the upper floors (approximately 460 dwellings), and associated car parking, amenity space and landscaping.

**Site** – Land at Wembley Park Station car park, Brook Avenue

*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**

AECOM, representatives for Transport For London requested a screening opinion from London Borough of Brent (the Council) on 12<sup>th</sup> February 2019. 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 fronts onto Brook Avenue on the south and the railway tracks to the north, and is adjacent to Wembley Park Station to the east and residential homes to the west. The site covers an area of approximately 0.67 ha and currently consists primarily of an open, level car park with two 2 storey commercial office buildings on the portion of the site immediately adjacent to Wembley Park Station.

As an edge of town centre site the uses are mixed, with the station, commercial elements and residential buildings. Given this, the scale of the developments within the immediate area vary widely, with a number of developments on the western portion of Brook Avenue acting as a transition zone from the highly urbanised town centre, comprising residential and commercial buildings ranging up to 10 storeys in height. All other development along Brook Avenue is formed of two storey semi-detached suburban dwellings.

Being within the Wembley Growth Area, some of the surrounding land has been recently developed, with associated increases in density. This site has been included in Brent's draft Local Plan Preferred Options November 2018 (BCSA7), along with a site to the north of the railway tracks, and the land to the south of Brook Avenue, stretching from Premier Inn in the east to the western end of Brook Avenue. It has been designated due to TfL indicating its likely availability for development, its high PTAL (proximity to Wembley Park Station), relatively low density, and position within the Wembley Growth Area.

The site does not include any significant extent of green space itself, however, the railway trackside to the north is designated as a Wildlife Corridor. There are also approximately 15 street trees to the south of the site along Brook Avenue. A large portion of the site's southern boundary includes a hedgerow.

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

The proposed development is for the demolition of the existing buildings and erection of a development of up to 26-storeys comprising five blocks, three of 11 storeys, one up to 16 storeys, and a fifth up to 26 storeys. The ground floor will be a podium which unites the 5 blocks under one development which will comprise flexible commercial use (approximately 1,600 sqm), with the 5 blocks providing residential units on the upper floors (approximately 460 dwellings), and associated car parking, amenity space and landscaping.

## **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 environment 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 the subject of this screening opinion. The site adjacent to the west was formerly part of the station's car park and allocated in the WAAP and its redevelopment was completed mid-2015, as follows:

12/3499 Car Park, Brook Avenue, Wembley. Erection of 4 blocks of flats (3x8-storey & 1x5-storey) comprising 109 flats and the erection of 2x3-storey semi-detached family houses and subject to a Deed of Agreement dated 13th May 2013 under Section 106 of the Town and Country Planning Act 1990, as amended

## **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:

12/1293 Kelaty House, First Way, Wembley, HA9 0JD. Full planning permission is sought for the redevelopment of the site comprising the erection of 5 buildings ranging in height from 4 to 13 storeys for a mix of uses including hotel/serviced apartments (Use Class C1), student accommodation (sui-generis use) and flexible business/retail/community/leisure uses (Use Classes B1/A1/A2/A3/A4/D1/D2), and ancillary development including basement car park and hard and soft landscaping providing both public and private amenity space and subject to a Deed of Agreement dated 18/10/2012 under Section 106 of the Town and Country Planning Act 1990, as amended. Granted 21<sup>st</sup> October 2012. Started on site.

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. Planning Permission Granted 23<sup>rd</sup> December 2016. Subsequent reserved matters have been submitted and construction has commenced.

16/1404 Former Amex House, North End Road, Wembley, HA9 0UU. Redevelopment of the former Amex House site and erection of one 4 to 8 storey building and one 13 storey building comprising 195 residential units (79 x 1bed, 91 x 2bed and 25 x 3bed) with associated car parking space, landscaping, plant room and energy centre, sub-station, landscaping, amenity space and part naturalisation of Wealdstone Brook, Subject to a Deed of Agreement dated 01/09/2017 under Section 106 of the Town and Country Planning Act 1990, as amended. Approved 6<sup>th</sup> September 2017. Construction commenced.

17/2782 Parkwood House, Albion Way, Wembley, HA9 0LP. Demolition of existing building including clearance of site, and erection of a part 13 and part 17 storey building comprising 113sqm of affordable workspace (Use Class B1) at ground floor level and 283 bedroom student accommodation (Use class Sui Generis) on the above floors with ancillary student reception area on the ground floor, cycle parking, bin stores, amenity space, landscaping, public realm works, installation of a rainwater attenuation tank and other associated works. (Mined to approve by Planning Committee 13<sup>th</sup> Dec 2017 subject to S106 obligation). Works started on site.

17/3059 All Units, Stadium Retail Park, Wembley Park Drive & 128 Wembley Park Drive (fountain studios), HA9. Outline planning permission for demolition of existing buildings on site and provision of up to 85,000 sqm (Gross External Area, GEA) of new land use floorspace (across 1.679 ha) within a series of buildings, ranging from 8 to 25 storeys in height, with the maximum quantum as follows:

- A1 - A4 (Use class) Retail, B1 Office and/or D2 Leisure and Assembly: up to 4,000 sqm; and
- C3 (Use Class) Residential: up to 57,000 sqm gross (approximately 680 units);

And either:

- D1 (Use Class) Non-residential institutions: up to 25,000 sqm; or
- A1 – A4 (Use Class) Retail, B1 Office and /or D2 Leisure and Assembly: up to 3,000 sqm; and C3 residential: up to 22,000 sqm; or
- D1 (Use class) Non-residential institutions: up to 16,000 sqm; and Sui generis (Use class) student accommodation
- up to 9,000 sqm; or C3 (Use class) Residential : up to 22,000 sqm (approximately 315 units)

Notwithstanding the above breakdown, the maximum quantum of floorspace by land use overall will always be 85,000 sqm GEA. No occupied residential or student living accommodation will be at ground level or below. Currently there is no clear indication of when application will be determined. The applicant is prioritising work on other application sites.

17/3151 Former VDC and Careys site, South Way, Wembley, HA9 OHX. Coach park to provide 290 coach parking spaces (or up to 1,015 car parking spaces) (Sui-Generis Use) over two levels (lower ground and upper ground floor levels) and car park to provide 734 car parking spaces (Sui-Generis Use) over five levels above (first to fifth floor levels) on the western portion of the application site along with associated hard and soft landscaping and access arrangements. Subject to a Deed of Agreement dated 27/03/2018 under Section 106 of the Town and Country Planning Act 1990, as amended. Granted 28<sup>th</sup> March 2018, started on site, expected completion date March 2020.

17/3797 Units 1-5 Inc, Cannon Trading Estate, First Way, Wembley, HA9 0JD Demolition of the existing buildings and erection of a part 7/9/10/11 storey building, comprising educational use (Use Class D1), office use (Use Class B1(a)) and student accommodation (Use Class Sui Generis), with ancillary external landscaping. 13<sup>th</sup> December 2017 Planning Committee minded to approve subject to completion of a S106 obligation. Works soon to complete.

17/4538 1 Olympic Way, Wembley, HA9 0NP. Prior approval for change of use of floors 1-7 and 9-12 from offices (Use class B1) into residential (Use class C3) involving the creation of 68 one-bed flats and 159 studio flats. Approved 19<sup>th</sup> December 2017. Construction to commence Spring 2019. In addition to this on this site 19/0395 1 Olympic Way, Wembley, HA9 0NP. Erection of a part-3, part-5, and part-7 storey roof top extension to existing building to create 88 flats; erection of a rear extension to existing building to create a new 15 storey block (including a 2 storey under-croft for vehicular and pedestrian access) to provide 31 flats, a total of 119 self-contained flats (12 x studios, 63 x 1 bed, 15 x 2 bed and 29 x 3 bed) with associated cycle and refuse storage, creation of public access alongside Wealdstone Brook and refurbishment of existing building facades to No. 1 Olympic Way (including replacement of windows). Submitted Feb 2019 with anticipated determination June 19.

17/5097 Olympic Way Office, 8 Fulton Road, Wembley, HA9 0NU. Redevelopment of the Olympic Office Site and erection of a part-21 and part-15 storey building comprising 253 residential units (12 x studios, 91 x 1-bed, 107 x 2-bed and 43 x 3-bed), 1,051m<sup>2</sup> of flexible retail uses (A1, A2, A3, D1, D2), car parking at basement level, with associated landscaping, plant room and amenity space. Consent granted 4<sup>th</sup> July 2018.

## **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 460 residential units and 1,600 sqm 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, businesses, Station, nursing home and a school.

#### 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 and heating systems. 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 development can be achieved.

The application includes the provision of up to 100 parking spaces, including 46 disabled parking spaces for residents (for approx. 10% of the residential units), 12 disabled parking spaces for the public, with the remaining 40 being provided for the onsite TFL staff. This represents a reduction of on-site parking compared with current uses. Parking controls may need to be increased in the surrounding area 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.

Consideration also needs to be given to the potential effects on the new internal receptors given the location for the proposed development adjacent to in part to a relatively heavily trafficked road and 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 a 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. Impacts on heritage significance should also be accompanied with an appropriate assessment, including measures used to reduce any potential adverse impacts. In addition a views assessment will identify the extent to which the development impacts on skyline and protected views and measures to reduce potential adverse impacts.

The Site does not lie within or near a Conservation Area or an Archaeological Priority Area. Brent Town Hall, approximately 400m north east of the Site is Grade II listed. Wembley Arena (formerly the Empire Pool) and three K6 telephone kiosks, approximately 600m and 560m to the south of the Site respectively, are Grade II listed buildings. The closest scheduled monument to the Site is a 'Medieval moated site, 454 m south-west of Sudbury Golf Club House', which is 3.2 km to the south west of the Site.

The nearest conservation area is Barn Hill which at its closest is 280 metres to the north and Wembley High Street conservation area is 750 metres to the south west.

The site can be considered to have a generally low archaeological potential for all past periods of human activity. Past post depositional impacts are considered severe as a result of previous development. On the basis the proposed desk based archaeological study should be sufficient in identifying any potential archaeological concerns.

An assessment of the impact of the significance of identified heritage assets and the development's proposed impact on them should accompany an application and identify ways in which potential adverse impacts, such as height, massing and materials have been mitigated to an acceptable level.

Of particular relevance is the site's proximity to the national Stadium Wembley which is subject to Local Plan policy WEM6 seeking to protect longer distance views to it and in particular its arch. The building will sit within the line of sight from the Barn Hill protected view 1. Its current proposed height of 26 storeys, has the potential to adversely impact on this view. Demonstration will need to be made through the proposed Townscape and Visual Appraisal of the extent of impact and as to how this impact will be appropriately mitigated.

The impact of the scale and height of the proposed buildings through the design and access statement, views assessment and an assessment of impact on heritage significance will allow sufficient clarity of impact on the setting of features of historic or cultural importance including the Wembley stadium views. To the south it is likely for the most part to be visually separated from listed buildings by development currently constructed as well as that likely to be constructed as a result of planning permission 15/5550, plus potentially 17/5097 and 16/1404. To the north there are currently no proposals which would effectively substantially increase height of buildings between the proposal and the Brent Town Hall. The justification of the heights and form of the development together with its impacts on the setting of the stadium/longer distance views can be set out in the design and access statement, together with a views assessment to accompany the planning application.

### Construction

The construction works are likely to require large cranes/ equipment, and therefore there is the potential for adverse effects on the setting of heritage assets and stadium views. These impacts are likely to be temporary and short lived.

### Operation

The height of the proposed development will be up to 26 storeys and therefore a greater scale than that previously on site. The proposal introduces a much taller building than currently identified as appropriate within the Wembley Area Action Plan. Nevertheless, in terms of wider setting it sits against a backdrop of taller buildings in the vicinity (Victoria Hall (up to 20 storeys) when viewed from the west and east) and the Wembley Park development to the south (consented or built 15+ storeys). The largest impacts will be to heritage assets to the north and views of the stadium from Barn Hill. Although the proposed development could lead to some adverse effects on the setting of heritage assets and the Wembley stadium views, significant effects to warrant EIA are not considered likely.

## Mitigation

Adjusting height, massing and materials to reduce the potential for adverse impact on local heritage.

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 which would warrant EIA in respect of heritage and cultural impacts. It is important to note, that whilst the effects are not considered to be significant in relation to the EIA Regulations, this does not preclude the Council from taking into account the adverse effects (and their acceptability) when determining the planning application.

## 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. Consistent with London Plan policies, construction materials will be sought/ used that seek to reduce embodied energy and therefore the potential for further greenhouse emissions.

## Operation

It is considered that the proposed development will be able to achieve the necessary carbon reduction targets in operation and building fabric materials through actual reductions combined with financial contributions secured through a planning obligation. 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.

A Section 106 obligation 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 will 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.

The site is within a historically industrial area and has been used as a builders' site in the past, but most recently as a car park. 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 an EIA.

### **Daylight, Sunlight and Overshadowing**

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

*Documentation Accompanying the Planning Application:* A Daylight and Sunlight Report will 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 building.

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

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

#### Operation

The operation of the proposed development will introduce buildings up to 26 storeys onto the site. Due to the proximity of nearby sensitive receptors and the height there is the potential for the proposed development to affect surrounding receptors. 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 on 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. It is important to note, that whilst the effects are not considered to be significant in relation to the EIA Regulations, this does not preclude the Council from taking into account the adverse effects (and their acceptability) when determining the planning application.

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

Documentation Accompanying the Planning Application: A Phase 1 Habitat survey will be submitted in association with the application.

The site contains no areas of statutory nature conservation and there are no such site within the immediate vicinity of the Site. There are no SPA, SAC or Ramsar designations within 5km of the Site. There is a single SSSI within 5km of the Site, namely Brent Reservoir SSSI, 1.5 km north-east of the Site. Masons Field (Fryent Country Park) Local Nature Reserve (LNR) is 1 km to the north of the Site and Brent Reservoir / Welsh Harp LNR is 1.5 km to the north-east of the Site. Fryent Country Park LNR consists of meadows, ponds, lakes, hedges and woodland. Brent Reservoir / Welsh Harp LNR consists of open water, marshes, trees and grassland and the reservoir includes associated waterfowl. Last assessed on 23 January 2008, Brent Reservoir was identified as being in favourable condition, having a good breeding bird assemblage on the open water and lowland fen habitats across the site.

The site is immediately adjacent to the railway trackside which is designated as a wildlife corridor and is within close proximity to Wealdstone Brook which is designated as a Grade II Site of Importance to Nature Conservation (SINC). The Proposal is unlikely to 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 a row of trees on the south eastern boundary.

### Construction

Depending on the findings of the Phase 1 Habitat 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.

## 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

### Documentation Accompanying the Planning Application

A Flood Risk Assessment (FRA) will be submitted with the planning application. The latest Brent Strategic Flood Risk Assessment 2018 identifies that the site is predominantly without flood concern, with a small section of the site having Flood Zone 3a (surface water) concerns. Large portions of the land surrounding the Wealdstone Brook have Flood Zone 3a (fluvial and tidal, and surface water) concerns which affect the residential dwellings which run along the south side of Brook Avenue, however, this impact does not extend to the proposed site.

## Construction

Given that the majority of the site is outside Flood Zone 3, in the construction process there is considered to be limited risk to property and people. The development will be expected to take a sequential approach in locating buildings wherever possible away from flood zone 3, thus reducing the risk of flooding to property on site and reducing flood storage/ impacting on hydrology resulting in increased flooding elsewhere. Easy access to land outside flood zone 3 on site should allow construction personnel to move to areas away from flood risk.

## Operation

The FRA will seek to ensure that the proposed development will not increase flood risk to occupants and off-site. This will include ensuring as little of the building footprint is located in Floodzone 3 as possible, and if it is putting less vulnerable uses in areas at higher risk and ensuring that the impacts on flood storage/ floodplain capacity are not adversely affected. 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 surface water flooding so as not to compound the potential impacts of fluvial flooding on properties to the south of the site. 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 be submitted with the application. Background noise levels on the site, and in this part of the Borough, are principally characterised by road traffic noise and the underground lines with moderate levels of noise from the adjacent commercial uses possible, and elevated levels of noise and activity likely during major sporting / cultural events. During the evening / night time hours, noise might also be influenced by the evening leisure economy.

#### **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**

The proposal includes the provision of up to 100 car parking spaces, however, this represents a reduction of around 35 spaces from the site's existing use. 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 primary sources of noise arise from proximity to the railway tracks and the road network, including a relatively heavily trafficked road, Bridge Road. 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 new homes, which if policy compliant, will result in a significant number of affordable homes being delivered too. In addition there will be 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. 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 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 views assessment/ townscape analysis will identify the extent to which the development impacts on skyline and protected views. The National Stadium is subject to local policy for protection of views to it from various locations across the borough.

#### 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 height of the proposed development will be up to 26 storeys and therefore a greater scale than that previously on site. The proposal introduces a much taller building than currently identified as appropriate within the Wembley Area Action Plan. Nevertheless, in terms of wider setting it sits against a backdrop of taller buildings in the vicinity (Victoria Hall (up to 20 storeys) when viewed from the west and east) and the Wembley Park development to the south (consented or built 15+ storeys). The largest impacts will be to views towards the stadium from Barn Hill. Although the proposed development could lead to some adverse effects on townscape and the Wembley stadium views, significant effects to warrant EIA are not considered likely.

As such it is important to note, that whilst the effects are not considered to be significant in relation to the EIA Regulations, this does not preclude the Council from taking into account the adverse effects (and their acceptability) when determining the planning application.

## 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 6. As such it has good public transport accessibility (Wembley Park station and numerous local bus services within 500 metres) and is in an area where the Council will seek to limit on site car parking provision. It is anticipated that the proposed development will be accessed via a new vehicular entrance further west along Brook Avenue, with an exit at the eastern end of the site.

## 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 limited on-site car parking 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 and could include financial payments secured through a Section 106 Planning Obligation towards enhanced controlled parking zone measures, 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, Flood Risk Assessment, Contaminated Study and the CEMP that will be required as part of the application/ permission process.

The site is adjacent to a water course, the Wealdstone Brook with potential for run-off direct from the site via non-formal pathways, or 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.

### **Construction**

During the construction process there is the potential to affect water quality through accidental pollution events, such as fuel spills and increased sediment within surface water passing through to adjacent watercourses. 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 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 Flood 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 Microclimate Assessment will 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 buildings onto the site that will be up to 26 storeys in height. Therefore there may be adverse effects on the existing wind conditions. 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 the Wembley masterplan area and other development sites adjacent or within the vicinity, particularly those that might generate transport movements along Fulton Road. One of the applications identified (15/5550) as part of the cumulative assessment were subject to Environmental Impact Assessments. The Council has considered the information contained within this assessment related to the individual impacts and also the associated cumulative impacts of the proposals.

## 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.

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.