

12th February 2019

London Borough of
Brent Brent Civic Centre
Engineers Way Wembley
HA9 0FJ

Request for EIA Screening Opinion for Redevelopment of Land Adjacent to Wembley Park London Underground Limited (LUL) Station

Dear Sir,

We write on behalf of Transport for London Property (the 'Applicant') to request a 'Screening Opinion' under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (amended 2018) (herein referred to as 'the EIA Regulations') in relation to a proposed development. The development comprises the construction of up to 460 residential dwellings (Use Class C3) up to 1,600sqm of commercial floor space, and up to 100 parking spaces, alongside cycle parking and amenity space on land adjacent to Wembley Park London Underground Limited (LUL) station (hereafter referred to as the 'Site') within the London Borough of Brent (LBB). The commercial element of the development would likely comprise in the main LUL/Transport for London (TfL) operational uses, however flexibility is sought for this to be used for other commercial uses (offices, retail etc) in the future should the operational uses no longer require this space.

The Site currently comprises a surface level station car park and two associated buildings. The Site is bounded by Brook Avenue to the south, Matthew Close to the west, railway tracks (the Chiltern Line, Network Rail) to the north and Wembley Park LUL Station to the east. An area of recreational space is located further north, on the opposite side of the railway tracks.

In line with the requirements of Regulation 6 (2) of the EIA Regulations, this screening request presents the following information to assist the LBB in adopting an EIA screening opinion for the Proposed Development:

- A plan sufficient to identify the land;
- A description of the nature and purpose of the Proposed Development; and
- A description of the aspects of the environment likely to be significantly affected by the Proposed Development and the likely significant effects, taking into account:
 - a. Schedules 2 and 3 of the EIA Regulations;
 - b. The characteristics of the Proposed Development; and
 - c. The location of the Proposed Development and its surrounds.

The Application Site and Surrounding Area

The application site (hereafter referred to as the 'Site') covers an area of approximately 0.67 hectares (ha) and is located adjacent to Wembley Park LUL Station. The Ordnance Survey grid reference for the Site is SU 519304 186336. A plan showing the indicative boundary of the Site is included in Appendix A.

The Site is rectangular in shape on a south-east, north-west axis, and comprises the Wembley Park Station NCP surface car park, two buildings which house LUL train drivers' facilities and other operational uses and associated staff car parking. Access to the car park is via Brooke Avenue to the south of the Site.

Railway tracks are located immediately adjacent to the northern boundary of the Site, beyond which are football pitches and playing fields associated with the Ark Academy School. Wembley Park Station forms the Site's eastern boundary. To the west of the Site are a pair of three-storey semi-detached houses and beyond that four blocks of eight-storey apartments. To the south-west of the Site are two storey houses with front gardens accessed from Brook Avenue. A ten-storey hotel is situated to the south-east of the Site on the corner of Bridge Road and Brook Avenue and faces onto Bridge Road. Adjacent to the hotel, directly south of the Site, are two apartment blocks (7 storeys and 9 storeys in height respectively). Approximately 15 street trees are present along the Site boundary with Brook Avenue.

The Site is located in a predominately residential area, in the transition area to Wembley town centre, and is considered suitable for residential development, which will contribute towards delivery of the council's growth strategy (see below).

In the wider area, Wealdstone Brook is located approximately 65m to the southwest of Brook Avenue. There are generally high-rise residential buildings and Wembley Stadium to the east and south respectively, with residential low-rise buildings to the west.

Site Planning History and Planning Policy Context

Wembley Park Station was originally opened in 1893 and has since undergone many extensions and modifications. It was renovated in association with the Wembley Stadium redevelopment in 2007, which included a new commuter concourse and retail and ticketing facilities access from Bridge Road, as well as building of platforms, works to the commuter car park and relocation of existing staff accommodation.

The revised National Planning Policy Framework (July 2018)¹ sets out the Government's planning policies for England and how these should be applied. Sustainable development underpins this framework, incorporating of economic, social and environmental aspects to meet the needs of the present without compromising the ability of future generations to meet their own needs.

The draft New London Plan has set an annual housing delivery target for Brent of a minimum of 2,915 units. The Brent Local Plan Preferred Options for the period 2019 – 2041² proposes continued residential-led mixed used development within the Wembley Growth Area which is to provide over 14,000 new homes. It also states that intensification and higher residential densities will be supported around Wembley Park Station where it can be demonstrated that development would take advantage of the area's good access to public transport. The Local Plan policies that are relevant to the Proposed Development are discussed where appropriate in the subsequent sections of this letter.

The Site is located within the Wembley Growth Area which is identified in the LBB Core Strategy³, under core planning policy 'CP7', with the focus on redevelopment that will drive the economic regeneration of Brent as a whole. The aim is to deliver 11,500 new homes and 10,000 new jobs in the Wembley Growth Area by 2026 through the development of sites along Wembley High Road and the land around Wembley Stadium.

The following policies in the Brent Local Plan (found within the Core Strategy and WAPP) are relevant to the Site:

¹ National Planning Policy Framework, 2018. Available: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf. Last checked 22/1/2019

² London Borough of Brent, 2018. Local Plan: Preferred Options. Available: <https://www.brent.gov.uk/media/16411928/brent-preferred-options-local-plan-nov-2018.pdf>. Last checked 22/1/2019

³ London Borough of Brent, 2010. Core Strategy. Available: <https://www.brent.gov.uk/media/16404211/core-strategy-small.pdf>. Last checked 22/1/2019

- CP1 Spatial Development Strategy;
- CP2 Population and Housing Strategy;
- CP3 Commercial Regeneration;
- CP6 Design & Density in Place Shaping;
- CP7 Wembley Growth Area;
- CP16 Town Centres and the Sequential Approach to Development;
- CP21 A Balanced Housing Stock;
- WEM 1 Urban Form;
- WEM 5 Tall Buildings; and
- WEM 6 Protected Stadium Views.

LBB has commenced a review of its Local Plan and formal consultation of the Preferred Options Local Plan was undertaken in November 2018 – January 2019. The Site has a draft allocation in the Preferred Options consultation document for mixed-use residential-led development (Site allocation BCSA7: Wembley Park Station). It is noted that land to the south of the Site has a draft allocation for *“Hotel/ other main town centres uses/ residential on the current Premier Inn site with residential on the remaining along Brook Avenue”* which include much higher density properties.

The Proposed Development

The Proposed Development comprises up to 460 residential units, up to 1,600 sqm of commercial space and up to 100 car parking spaces.

It is proposed that the existing buildings on the Site will be removed and replaced by a series of individual blocks of 11 to 16 storeys in height and a landmark building of up to 26 storeys, connected by a single storey podium which provides amenity space on top and parking and servicing below. There will be a new vehicular access off Brook Avenue, in a similar location to the existing entrance, and a new vehicular exit off Brook Avenue in the eastern part of the Site.

Existing easement zones from services along the Site boundaries will be maintained, including Thames Water sewage pipes, water mains, the railway tracks (Network Rail) to the north of the Site, telecommunications infrastructure, low-pressure gas mains and UK Power Networks electricity cables.

EIA Screening Process

Determining the Need for an EIA

Developments are termed ‘EIA Developments’ if they trigger the requirement for an EIA under the EIA Regulations. Screening of developments to identify whether an EIA is necessary is based on the likelihood of significant effects arising from the Proposed Development. ‘EIA Developments’ are divided into Schedule 1 and Schedule 2 applications under the EIA Regulations.

Schedule 1 developments, for which EIA is mandatory, constitute major developments that are likely to have significant effects, such as major chemical or petrochemical projects and construction of ground or air transport infrastructure over a certain threshold. For all other developments which fall under Schedule 2, the need for an EIA is determined on the basis of set criteria, which are outlined below:

- The development falls within one of the classes of development stated in Schedule 2; AND
- EITHER Exceeds the size threshold for that class of development specified within Schedule 2; OR is in a sensitive area as defined by the EIA Regulations; AND
- It is likely to have significant effects on the environment by virtue of factors, such as its nature, size or location.

Hence, the selection criteria are not just simply related to the scale or characteristics of development, but also consider the sensitivity of the receiving environment that will be affected by a development and the types and characteristics of the potential impact. Schedule 3 of the EIA Regulations provides criteria which are to be taken into account when determining whether a proposed scheme is EIA Development. A summary of the EIA screening process is provided in Appendix B.

The Proposed Development has been assessed against the above criteria and the process outlined in Appendix B to establish whether it constitutes EIA Development, the results of which are presented below.

Review Against the EIA Regulations

The Proposed Development is not a Schedule 1 development as it does not fall under the description of Schedule 1 developments as defined by the EIA Regulations and hence does not automatically require an EIA. However, the Proposed Development can be classified as an 'Urban development project' and therefore, would fall under Schedule 2 category 10(b) of the EIA Regulations.

The Proposed Development is not located within a sensitive area as defined by Regulation 2(1) of the EIA Regulations. The closest sensitive area to the Site as defined by the EIA Regulations is Brent Reservoir Site of Special Scientific Interest (SSSI), 1.7km east of the Site. Therefore, the Proposed Development is not within, partly within or immediately adjacent to a sensitive area as defined by the EIA Regulations.

The area thresholds (i) and (iii) of Schedule 2 category 10(b) urban development projects are: 1ha for non dwellinghouse development and 5ha for an overall area of development. As a dwellinghouse development, the Proposed Development does not fall within threshold (i) and since the total area of the Site is 0.67ha, the Proposed Development does not exceed threshold (iii). Threshold criterion (ii) for the Schedule 2 category 10(b) urban development projects is exceeded if "*the development includes more than 150 dwellings*". As the Proposed Development is likely to comprise up to 460 residential units, this threshold will be exceeded.

The exceedance of the Schedule 2 category 10(b) threshold (ii) triggers the need to consider whether the Proposed Development is EIA Development with reference to the following criteria set out in Schedule 3 of the EIA Regulations:

- I. Characteristics of the Proposed Development (e.g. size, cumulative effects when combined with other developments, use of natural resources, production of waste, pollution, nuisance and risk of accidents);
- II. Location of the Proposed Development (by reference to the environmental sensitivity of the area); and
- III. Types and characteristics of the potential effects of the Proposed Development (having regard in particular to the extent, nature, magnitude and complexity, probability and duration, frequency and reversibility of the effect, including the likelihood for transboundary effects).

The environmental aspects likely to be affected by the Proposed Development and the likely significant effects of the Proposed Development in line with the requirements of Schedule 3 of the EIA Regulations are considered in sections below. In doing so, the thresholds and criteria for defining Schedule 2 development have been applied, together with the selection criteria for screening Schedule 2 Development (provided in Schedule 2 and Schedule 3 respectively of the EIA Regulations).

Review in Light of the Planning Practice Guidance

The Planning Practice Guidance (PPG)⁴ provides guidance on EIA screening and how to assess whether a development is likely to give rise to significant environmental effects, such as to require an

⁴ Available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/630689/eia-thresholds-table.pdf

EIA. The PPG provides a set of indicative criteria and thresholds, and key issues to consider to aid in determining whether a development is likely to result in significant effects.

In relation to Schedule 2 category 10(b) projects, the PPG indicative criteria and thresholds state that *“Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination”*.

Furthermore, the PPG establishes the following indicative thresholds for *“sites which have not previously been intensively developed: (i) area of the scheme is more than 5 hectares; or (ii) it would provide a total of more than 10,000 m² of new commercial floor space; or (iii) the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings)”*.

The Proposed Development will be denser and of greater height than the existing land use of the Site, which mainly comprises a surface car park and some low-level buildings. However, none of the PPG indicative thresholds are met and/or exceeded by the Proposed Development. The PPG relating to Environmental Impact Assessments indicates that it is possible to provide a broad indication of the type or scale of development which is likely to be a candidate for EIA. This is set out in the ‘Thresholds and Criteria for the identification of Schedule 2 development requiring EIA and indicative values for determining significant effects’ section of the guidance. It advises that the *“key issues to consider”* are the *“physical scale”* of the development and the *“potential increase in traffic, emissions and noise”*.

Consideration of these key issues in line with the requirements of Schedule 3 of the EIA Regulations is provided in the following section.

Potential Effects of the Proposed Development on the Environment

The characteristics of the Proposed Development and those of the Site have been considered when assessing the environmental aspects likely to be affected and the potential for likely significant effects to result from the Proposed Development. For the purposes of this EIA screening request the Proposed Development has been appraised against the following topics and discussion regarding the results and conclusions of each respective assessment is presented below:

- Traffic and Transport;
- Air Quality;
- Noise and Vibration;
- Greenhouse Gases and Climate Change;
- Socio-Economics;
- Biodiversity and Designated Sites for Nature Conservation;
- Ground Conditions.
- Water Resources, Flood Risk and Drainage;
- Built Heritage, Landscape and Visual Impact;
- Archaeology;
- Waste Management and Recycling;
- Daylight, Sunlight and Overshadowing;
- Wind Microclimate;
- Major Accidents and Disasters; and
- Cumulative Effects with Other Developments.

The below sections provide commentary on these topics, including the current baseline, potential impacts of the Proposed Development (during the construction and operational phases) and potential mitigation measures.

Traffic and Transport

Wembley Park Station is served by the Jubilee and Metropolitan lines, which both lead into central London, with the Jubilee line now part of the night tube network, providing the opportunity for the night-time economy to grow here. Additionally, there are bus stops along Bridge Road, which are served by routes towards Preston Road, Kenton or Willesden (206, 223, 297), as well as Kingsbury Green or Neasden (83, 182) and towards Alperton, Harlesden or Sudbury (83, 182, 206, 223, 297 and N83). The closest over ground railway station is Wembley Stadium, which is approximately 1km south of the Site, providing services to London Marylebone and to Gerrards Cross and High Wycombe. According to the Brent Local Plan the Site has a Public Transport Accessibility Level (PTAL) of 6, defined as excellent.

The Site is well located for a good selection of restaurants, shops and cafes, as well as independent shops and larger high street stores. The nearest primary school is Ark Academy Primary School, approximately 0.15km walking distance from the Site. Another two primary schools are also located within approximately 0.6km walking distance from the Site.

Brent is one of the Mayor's London Borough's for Cycling with the intention of increasing cycling levels in outer London. There is an existing network of dedicated signed cycle routes and stretches of secondary local routes which provide a degree of access into Wembley by bicycle. However, cycle links into Wembley are poor with a number of physical barriers such as railways, the North Circular and the River Brent. The council are working in partnership with key stakeholders, such as TfL, cycling groups and developers, to deliver and promote cycling initiatives, such as connecting cycle routes across the main rail line areas.

Although road connection via the North Circular is generally good, there are concerns about operational effectiveness and potential congestion on the road network within, around and through Wembley, alongside developments further afield at Brent Cross. Road connections to the North Circular and through the main regeneration area, planned prior to the stadium redevelopment, have not been completed because of funding difficulties / security concerns. Congestion occurs regularly on main roads through the area and at key junctions, making travelling by bus a less attractive option.

Brent, together with neighbouring local authorities and partnerships, has been supportive of new and/or improved connections and is promoting such initiatives through the councils input into the West Sub Regional Transport Plan. In addition, the council is currently working with Transport for London on developing a future Bus Strategy for Wembley which will identify a viable future bus network and the bus infrastructure required to support this. Targets have been set for cycling in the borough to increase mode share to 3% by 2021, and 30% mode share for public transport by 2030, which should alleviate pressure on local roads (Brent Transport Strategy 2015 – 2035)⁵.

Existing vehicular access to the Site is to the south, off Brook Avenue. 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. The Site is relatively well connected to the motorway network. Access to junction 1 of the M1 motorway would be via the A4088 and the A406 northbound. Access to the M4 at Gunnersbury is via the A4088 and the A406 southbound. A temporary increase in traffic on the A4088 and A406 during construction of the Proposed Development is anticipated, however the contribution arising from construction of the Proposed Development will be insignificant in the context of the existing large number of vehicle movements on these routes.

The existing public car parking provided in the NCP car park will be removed with the possible exception of 12 blue badge public parking spaces which may be re-provided within the Proposed Development. The remainder of the parking provision within the Proposed Development will be private

⁵ London Borough of Brent, 2015. Brent Long Term Transport Strategy 2015 – 2035. Available: <https://www.brent.gov.uk/media/16403671/transport-strategy-2016.pdf>. Last checked 22/1/2019.

for residents' use only. It is anticipated that up to 100 parking spaces will be provided within the Proposed Development, of which 12 will be blue badge public parking, 40 operational LUL replacement spaces and around 10% of the total number of units for the development (approximately 46 blue badge spaces). There will likely be vehicle movements associated with residential parking and servicing vehicles, however it is anticipated that there will be an overall reduction in the number of vehicle movements to the Site compared with the existing use of the NCP car park. Flexibility is sought as part of this EIA screening request for up to 100 parking spaces, which will still be a reduction of around 35 spaces overall from current provision although this is subject to confirmation given the ongoing design.

A Transport Assessment (TA), including a full analysis of trip generation associated with the Proposed Development across all transport modes, public transport services accessible from the Site and a detailed description and analysis of the proposed parking provision and access arrangements for the Proposed Development will be submitted in support of the planning application. The TA will include the results of traffic modelling to quantify the change in traffic flows due to the Proposed Development and any mitigation measures required will be identified. The TA will be supported by a Travel Plan which will seek to encourage sustainable modes of travel to the Proposed Development once it is complete and occupied. Furthermore, a Delivery and Servicing Plan and a Construction Traffic Management Plan would be prepared and are likely to be subject to planning conditions. Following completion of the TA and the implementation of appropriate mitigation it is considered that no significant effects on traffic and transport as a result of the Proposed Development are likely.

Air Quality

The Site is located within an Air Quality Management Area (AQMA) and is approximately 2km from the North Circular. The AQMA includes the entire area south of the North Circular Road and all housing, schools and hospitals along the North Circular, Harrow Road, Bridgewater Road, Ealing Road, Watford Road, Kenton Road, Kingsbury Road, Edgware Road, Blackbird Hill, Forty Lane, Forty Avenue and East Lane.

Construction activities and the emissions from vehicles accessing the Site during operation of the Proposed Development have the potential to result in air quality impacts at sensitive receptors near to the Site.

The main impacts during construction would arise from fugitive emissions of dust due to activities such as demolition, earthworks or construction and increases in particulate matter (PM₁₀) and nitrogen dioxide (NO₂) concentrations at sensitive receptors due to emissions from road traffic and plant (i.e. non-road mobile machinery (NRMM)). These impacts are likely to be localised and temporary in nature. It is noted that the existing public car park would cease to be operational whilst construction is ongoing at the Site. As such the additional number of vehicle movements to the Site during construction would to some extent be offset by a reduction in vehicles accessing the public car park, although the composition of the vehicles during construction would differ, with an increase in the number of Heavy Goods Vehicle (HGV) movements during construction. The main sources of emissions to air during operation of the Proposed Development would be associated with vehicles servicing the Site and accessing parking spaces.

Sensitive receptors to air quality effects during construction and operation of the Proposed Development include nearby residential properties, community facilities (e.g. schools and hospitals) and designated ecological sites that include features sensitive to local air pollution. The air quality sensitive receptors close to the Site comprise residents of properties on the opposite side of Brook Avenue, as well as workers/guests at the Premier Inn Hotel, residents in flats on Matthews Close and Cranston Close to the west of the Site, as well as those using the station.

Designated sites for nature conservation located in the wider area may be sensitive to changes in the concentrations of NO₂ and dust emissions associated with emissions from road traffic. Sites for nature conservation in the local area comprise Fryent Country Park Local Nature Reserve (LNR) approximately 0.8km to the north, Brent Reservoir LNR and SSSI approximately 1.7km to the east. Areas of land and inland water have special legal protection in the UK due to the presence of important habitats and species. This underpinning statutory protection helps to prevent damaging

activities to these sites (including arising from air pollution), which may have national, European or international designation and importance. Given that there are no statutory designated ecological sites within approximately 250m of the Site, no adverse effects from dust emissions during construction of the Proposed Development on statutory designated sites are anticipated since the main effects of dust arisings will occur within 250m of the emissions source.

A Local Air Quality Assessment will be undertaken and submitted in support of the planning application for the Proposed Development, taking account of anticipated dust arising during construction, and emissions to air from construction traffic and operational road traffic as well as potential energy sources during occupation of the Proposed Development. The Local Air Quality Assessment will include an assessment of the suitability of the Site for the proposed residential use and the potential effects of the Proposed Development on nearby sensitive receptors and specify mitigation measures required to avoid significant effects.

The Brent Local Plan establishes provisions related to air quality, and these will be taken into account during the design of the Proposed Development. Mitigation measures for the construction works will be specified within a Construction Environmental Management Plan (CEMP), which will be implemented to control and minimise environmental effects associated with the construction works. With the implementation of the specified mitigation, no significant effects on air quality are considered likely.

Noise and Vibration

Existing noise and vibration conditions at the Site are likely to be dominated by the railway lines to the north, road traffic noise from Brook Avenue to the south of the Site, as well as Bridge Road (A479) to the east of the Site and the A4088 further north which leads off Bridge Road. There are also football pitches located to the north of the Site, on the other side of the railway tracks, which may contribute as an occasional source of noise. When events are held at Wembley Stadium there is also an increase associated with crowd noise from people using the station.

The current on-site noise sources are related to traffic generated by the existing Site uses as a car park and welfare facility for train drivers.

During construction of the Proposed Development potential effects may occur due to increases in noise and vibration from construction activities and plant and increases in construction vehicle movements (e.g. Heavy Goods Vehicles). These impacts are likely to be localised and temporary in nature over the duration of the construction works.

During operation of the Proposed Development, the main change in noise levels will be as a result of the change in parking provision at the Site (from public car park to predominantly residents' only parking) and a reduction in the number of public parking spaces. The main noise-sensitive receptors likely to be affected comprise residents of properties and guests/workers of the hotel on the opposite side of Brook Avenue to the south, as well as residents of Matthews Close to the west. Further to the south on the opposite side of Wealdstone Brook, residents of properties along Kingswood Road and Elmside Road and Elliot Close may be affected. There is also a Primary School approximately 125m to the north along with a residential nursing home, located approximately 200m to the north west.

A Noise and Vibration Assessment will be undertaken to support the planning application for the Proposed Development. The assessment will identify the main sources and sensitive receptors of noise and vibration at the Site, including the results of a baseline noise and vibration survey (including consideration of the suitability of the Site for the proposed residential development). It will also include prediction of the levels of noise to be produced during operation of the Proposed Development, and potential measures to minimise noise and vibration from sources such as construction activities, construction and operational traffic and building services plant to be included on Site. Mitigation measures to be implemented during construction will be specified within a CEMP.

The Brent Local Plan establishes provisions related to noise and how new development is required to mitigate and minimise the existing and potential adverse impacts of noise and vibration, and these will be taken into account during the design of the Proposed Development, as appropriate. Following the

implementation of the specified mitigation, no significant noise and vibration effects are considered likely.

Greenhouse Gases (GHG) and Climate Change

The key climate projections for the UK (according to the UKCP09⁶) are that summers will become hotter and drier; winters will become milder and wetter; soils will become drier on average; snowfall and the number of very cold days will decrease; sea levels will rise; and storms, heavy and extreme rainfall, and extreme winds will become more frequent.

The climate change projections and climate change impacts, adaptation and mitigation measures will be considered within the design of the Proposed Development and taken into account within other documents which will be submitted in support of the planning application as appropriate (see below). The strategy relating to climate change for the Proposed Development will be based on three key aspects: adaptation, resilience and mitigating greenhouse gas (GHG) emissions.

- **Adaptation:** The planning application will be accompanied by a Flood Risk Assessment and Surface Water Drainage Strategy that will demonstrate the ability of the proposed drainage strategy for the Proposed Development to adapt to the predicted scenario of rainfall increase. The Environment Agency's mapping indicates that the Site is at low risk of surface water flooding, with surface water pathways draining across the Site. It is noted the Site lies within a critical drainage area. In line with the Environment Agency's guidance⁷, the drainage strategy will be designed to accommodate a 40% increase in precipitation with climate change.
- **Resilience:** The design of the Proposed Development will consider the climate projections summarised above in order to withstand the impacts generated by the predicted changes. This can include measures such as specifying drought resilient planting within the Landscape Strategy and setting a strategy to avoid the overheating of buildings.
- **Mitigating GHG emissions:** The GHG emissions arising from the Proposed Development will be minimised throughout the construction and operational phases. During construction, the CEMP will outline measures to use energy in an efficient manner. Materials with lower embodied carbon will be considered during detailed design development, such as locally sourced products and materials with a higher recycled content for inclusion in detailed design specifications. Materials made available through excavation (for example, fill soil and gravels) will be reused directly on-site where feasible to minimise emissions associated with the import of materials to Site, and embodied carbon associated with additional materials. During design development of the Proposed Development, a Part L Building Regulations compliant baseline for energy consumption will be established against which further energy efficiency measures, and low and zero carbon technologies will be considered, whilst also acknowledging Site constraints and their feasibility. An Energy and Sustainability Strategy will be prepared and submitted in support of the planning application to demonstrate how the Proposed Development complies with London Plan Policy 5.2 Appendix D of Sustainable Design and Construction SPG.

Subject to the incorporation of the measures detailed above, it is considered that no significant effects on GHG emissions and climate change will arise as a result of the Proposed Development.

Socio-economics

In 2017 the Office for National Statistics estimated that the population of Brent was 329,100, with 73.3% of working age people being economically active, which is lower than the UK average of 77.4%. Brent is one of the most ethnically diverse boroughs in London, with 33% of people from South Asian heritage and 19% from African and Caribbean heritage.

⁶ Met Office, UK Climate Impacts Programme, British Atmospheric Data Centre, University of East Anglia, Newcastle University [online]. Available at: <http://ukclimateprojections.metoffice.gov.uk/>.

⁷ Environment Agency (2016) Flood risk assessments: climate change allowances. <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

According to the London Poverty Profile⁸, Brent is a generally poor area, with 33% of households living in poverty and 32% of employees earning less than the London Living Wage (a higher poverty rate than any other London borough except Newham). However, 30% of new housing completions in Brent were affordable in the 3 years leading up to 2015/2016, which is well above the London average. Brent also has the lowest proportion of temporary accommodation placed outside their borough, with 96% of temporary placements being found within Brent.

The Proposed Development will result in the provision of housing (including affordable housing) and commercial space and therefore additional local spending by residents and workers. Employment opportunities will be provided during the construction phase and through the potential provision of commercial floorspace. There will also be an increase in local spending by new residents once the scheme is complete and operational.

The development of the Site for residential use, LUL operational uses and associated car parking is supported by local planning policy. The Brent Local Plan advocates that there will be continued residential-led mixed use development within the Wembley Growth Area, and that intensification and higher residential densities will be supported around Wembley Park Station (where it can be demonstrated that development would take advantage of the area's good access to public transport).

The Proposed Development will help the LBB to meet its housing growth for the Wembley Growth Area in the Local Plan (over 14,000 residential units by 2041). The Site is identified for the provision of housing as part of the preferred policy approach to housing delivery, as set out section 5.1 Central, of the draft Brent Local Plan (Site allocation BCSA7: Wembley Park Station). It is proposed that an Affordable Housing Statement is submitted with the planning application, which will outline the mix and tenure of residential units to be provided and demonstrate how the Proposed Development will provide housing to cater for different social groups at various affordability levels.

A common effect of an increase in population in an area is a growth in the demand for social infrastructure such as General Practitioners (GPs). The closest GP is located approximately 0.3km from the Site. Brent has 56 GP practices with a registered population of 370,000 patients. These GP practices have organised themselves into four localities – Harness, Kilburn, Kingsbury and Willesden. The Harness locality covers the areas of Harlesden, Kingsbury, Neasden and Wembley. There is a potential for reaching patient over-capacity with an increase in population, and a need for additional healthcare facilities in the area to accommodate additional demand.

The increase in population will also generate additional demand for primary and secondary school places. A total of nine primary schools are located within 0.8km radius from the Site. There are nine secondary schools within 3km radius of the Site. In April 2015 London Councils produced a report highlighting the particular challenge that London has, compared to the rest of the country, to meet the increased demand for school places. Within London, Brent is one of the Local Authorities where demand for school places is particularly high. The Proposed Development may result in additional pressure being placed on primary and secondary school places locally. It is noted that the Wembley Masterplan (Application Ref. 15/5550, consented May 2016) includes the provision of a new three form entry primary school and nursery, a new GP surgery and community meeting spaces, all to be located south of the Site and within a 800m radius.

The Proposed Development will provide a proportionate financial contribution to the funding of social infrastructure, if required. Therefore, no significant adverse socioeconomic effects on social infrastructure as a result of the Proposed Development are considered likely. The Proposed Development will result in beneficial effects due to the provision of housing, and an increase in local spending.

Biodiversity and Designated Sites for Nature Conservation

Habitats on Site

⁸ Trust for London, 2016. Poverty and inequality data for Brent. Available: <https://www.trustforlondon.org.uk/data/boroughs/brent-poverty-and-inequality-indicators/>. Last checked 22/1/2019.

The Site is located to the north west of the building forming Wembley Park LUL Station. The Site currently comprises hardstanding (including a surface car park for the station) and two buildings (both two storeys). A row of trees is present along the southern eastern boundary of the Site, from available information it is understood there are approximately 15 trees. The Proposed Development may result in a loss of habitats and disturbance of protected species if these are found to be using the Site, however given the limited vegetation cover present on the Site protected species are considered unlikely to be present. The railway line adjacent to the north is anticipated to act as a wildlife corridor and will not be affected by the Proposed Development.

An Extended Phase 1 Habitat Survey (and further surveys if considered necessary following the Extended Phase 1 Habitat Survey) will be undertaken to confirm the likely presence or absence of protected and notable species within the Site and its immediate surroundings. The results of the ecological survey, a desktop review of existing protected species records and the potential effects of Proposed Development on habitats and species will be presented within a Preliminary Ecological Appraisal (PEA) report which will be submitted with the planning application. The PEA will set out the design measures required to avoid, minimise, and mitigate any potential effects on ecology and biodiversity and opportunities for biodiversity enhancement. To mitigate the effects of the Proposed Development during construction, appropriate mitigation measures will be included within the CEMP in relation to any sensitive ecological receptors (such as nesting birds) which may use the existing trees and buildings on the Site.

In line with the Brent Local Plan “Preferred Options” Policy BG11 ‘Green and Blue Infrastructure in Brent’ the Proposed Development will be appropriately designed to enhance biodiversity, as well as being integrated into existing green and blue infrastructure. Provision will be made for a long-term landscape and ecological management plan for the Proposed Development. The Landscape Strategy for the Proposed Development will include consideration of measures to support priority species listed in the Brent Biodiversity Action Plan (2007)⁹.

An Arboricultural Impact Assessment will be submitted with the planning application to determine the quality of the existing trees within the Site in accordance with the criteria set out in British Standard (BS) 5837: 2012 Trees in relation to design, demolition and construction. The existing vegetation on the Site is limited and comprises approximately 15 trees. The design of the Proposed Development will be reviewed in light of the tree survey plan to determine the effects of the Proposed Development on the existing trees and if appropriate to identify recommendations for trees which can be retained.

Following implementation of the mitigation to be set out within the PEA and the Arboricultural Impact Assessment, it is considered that no significant adverse effects on ecology and biodiversity are likely to arise as a result of the Proposed Development. The Proposed Development provides a significant opportunity to increase biodiversity at the Site.

Designated Sites for Nature Conservation

No Sites of Special Scientific Interest (SSSIs), Special Protected Areas, or Special Areas of Conservation have been identified within a 1km radius of the Site. According to a review of the Multi-Agency Geographic Information for the Countryside (MAGIC) mapping¹⁰, Fryent Country Park Local Nature Reserve (LNR) is located approximately 0.8km to the north, with Brent Reservoir LNR and SSSI approximately 1.7km to the east of the Site.

Wealdstone Brook is designated as a Site of Importance to Nature Conservation (SINC), Borough Grade II, and is located 100m to the south of the Site.

The consultation draft Brent Local Plan states that any new (net) residential development will place pressure on LNRs and SINC. In compliance with the adopted Local Plan, the Proposed Development will provide or contribute toward the greening of the borough by incorporating landscaping and tree planting and other measures to promote biodiversity, and to contribute to the action plans set out in the

⁹ London Borough of Brent, 2007. Brent Biodiversity Action Plan. Available: <https://www.brent.gov.uk/media/325129/Brent's%20Biodiversity%20Action%20Plan%202007.pdf>. Last checked 23/1/2019.

¹⁰ Multi-Agency Geographical Information for the Countryside, 2019. Available: <https://magic.defra.gov.uk/MagicMap.aspx>. Last checked 22/1/2019.

Brent Biodiversity Action Plan. The PEA report to be submitted with the planning application will identify any potential effects from the Proposed Development on SINCs and will specify further mitigation as appropriate. With mitigation in place, the effects of the Proposed Development on the Natura 2000 sites are not considered to be significant.

Ground Conditions

According to mapping published by the British Geological Survey¹¹ the Site is underlain by London Clay strata of the Eocene Series. Superficial deposits of Alluvium, associated with the channel of the Wealdstone Brook south-west of the Site, are indicated in proximity to the north-western part of the Site although they do not appear to encroach on the Site.

A ground investigation completed by Crossfield Consulting Limited at the Site in 2010¹² encountered similar strata similar to the published geology. Made Ground was encountered across the Site, present to an average depth of 1.5m below ground level (bgl), the lower horizon comprises reworked London Clay to depths of 3m bgl in the southeast and 7m bgl in the northwest. London Clay underlies the Made Ground ranging from 8.5m - 11.5m bgl. The Lambeth Group was encountered underlying the London Clay in one location.

The Site has historically been associated with railway sidings and was later used as a builders' yard and then as a car park. It is also noted that the ground levels were raised at the Site some time during the 1950s. Railway land may be a potential source of heavy metals, petroleum hydrocarbons and polyaromatic hydrocarbons (PAHs). Depending on the nature of the builders' yard, there may be a potential for it to have been a potential source of fuels, particularly refuelling and maintenance of vehicles was undertaken on the premises. The current land use has the potential to introduce limited quantities of oil and fuels to the shallow soils from cars.

The ground investigation identified shallow Made Ground which was noted to be ashy and this is common of fill materials dating from the 1950s and 1960s as household wastes were largely dominated by ashy materials rather than putrescible materials. Ash is commonly associated with heavy metals and PAHs, although such chemicals are fused within the ash structure such that they have limited mobility.

With respect to potential offsite sources of potential contamination there are a number of possible sources associated with petrol stations and other commercial premises in the local area. However, these potentially contaminative land uses are typically located to the west or south of the Site. Based on the presence of the Wealdstone Brook and the direction of flow in this watercourse, it is considered that the land uses that may be associated with mobile contaminants are located down hydraulic gradient of the Site, such that contaminants would not migrate towards the Proposed Development. On this basis, it is considered that there are no potential nearby off-site sources of contamination that could adversely affect the Site.

The 2012 Ground Investigation concluded that there is generally a low risk to future Site residents and a negligible risk to the water environment associated with the ground conditions. Elevated concentrations of certain heavy metals and PAHs have been identified. However, an effective barrier will be in place following development due to the presence of buildings and hardstanding road pavements. A specified minimum thickness of topsoil/subsoil should be placed in landscaping areas to prevent impacted soils being returned to the surface and maintain an effective barrier.

During construction there is potential for exposure of contaminated soils, generation of dust, volatile organic compound emissions, migration of existing soil contamination to groundwater and off-site surface water, and accidental loss or spillage of construction materials. Given the nature of the proposed uses, the Proposed Development will not introduce significant new sources of contamination during operation.

An up to date Phase 1 Contaminated Land Desk Study will be submitted with the planning application for the Proposed Development, which will identify potential source-receptor-pathway linkages and the

¹¹ British Geological Survey, 2019. Geology of Britain viewer. Available: <http://mapapps.bgs.ac.uk/geologyofbritain/home.html>. Last checked 22/1/2019.

¹² Crossfield Consulting Limited, 2012. Ground Investigation Report: Brook Avenue, Wembley. Doc Ref: CCL01985 BL24-R1

potential risk of impacts from contamination. An intrusive ground investigation will be undertaken to evaluate the quality of shallow soils and groundwater at the Site, likely to be subject to a planning condition.

The ground investigation will include soil, groundwater, and gas monitoring and could be combined with a geotechnical assessment to assist with foundation design. The ground investigation will also provide information on the type and chemical composition of any material to be excavated as part of the construction works. On the basis of the ground investigation results, the need for a remediation strategy and verification reports will be determined. In addition, construction environmental management measures will be contained within a CEMP and implemented by the Contractor, along with any environmental design and management measures which will be incorporated into the Proposed Development.

It is considered that following the completion of the ground investigation and the integration of appropriate design measures and construction mitigation measures, the risk from ground contamination will be low. Following the implementation of mitigation measures no significant ground contamination effects would arise as a result from the Proposed Development.

Water Resources, Flood Risk and Drainage

The nearest body of water to the Site is Wealdstone Brook, approximately 100m to the south, which flows in a general north-south direction and flows into the River Brent, a tributary of the River Thames. The Brent Reservoir LNR and SSSI is located approximately 1.7km to the east. The Site is located within the Operational Catchment of the Brent Rivers and Lakes, which contains extensive tributaries in north and west London, converging with River Brent at the Brent Reservoir and near Wembley Stadium. The Operational Catchment contains six waterbodies; four heavily modified and two natural. Wealdstone Brook has a moderate ecological status, and a good chemical status (2016) according to Environmental Agency Water Framework Directive (WFD) data¹³.

The Ground Investigation completed in 2012 found perched water at one location in the western part of the Site. This was associated with a thin gravel horizon within the Made Ground at a depth of about 5.5m bgl. Groundwater was not encountered to the depths investigated, however and the groundwater conditions are based on observations made at the time of the fieldwork. It should be noted that groundwater levels may vary due to seasonal and other effects. The Site is not located within a groundwater Source Protection Zone and there are no groundwater abstractions within 1km of the Site.

As indicated by flood mapping published by the Environment Agency, the Site is within Flood Zone 1. Flood Zone 1 is defined as land which is at risk of flooding from fluvial flood events with less than 1:1000 (0.1%) annual probability of occurrence, i.e. it is considered to be at 'very low probability' of fluvial flooding. The northern portion of the Site is categorised as being at low risk of flooding from surface water (based on a 1,000-year return period rainfall event). The Environment Agency flood risk mapping tool¹⁴ also indicates a very low flood risk at the Site from flooding from reservoirs. It is noted that the Site lies within a critical drainage area.

A Flood Risk Assessment and Surface Water Drainage Strategy will be submitted in support of the planning application for the Proposed Development. The Flood Risk Assessment will present the results of an assessment of the risk of flooding to and from the Proposed Development. The drainage strategy will seek to discharge surface water flows from the Proposed Development at greenfield runoff rates and will attenuate rainwater on-site and incorporate measures to minimise the pollution risk to ground water and surface water.

Therefore, no significant effects on the water environment are anticipated as a result of the Proposed Development and the risk of flooding, which is low, will be mitigated via measures specified within the Surface Water Drainage Strategy.

¹³ Environmental Agency, 2019. Brent Rivers and Lakes – Summary. Available: <https://environment.data.gov.uk/catchment-planning/OperationalCatchment/3044/Summar>. Last checked 22/1/2019

¹⁴ Environmental Agency, 2019. Flood map for planning. Available: <https://flood-map-for-planning.service.gov.uk/confirm-location?easting=518716&northing=185753&placeOrPostcode=wembley>. Last checked 22/1/2019.

Archaeology

There are no World Heritage Sites, scheduled monuments or registered battlefields within 1km of the Site.

As indicated previously, the Site has historically been associated with railway sidings and, later, a builders' yard. More recently, the Site has been used for car parking and two office buildings. It is also noted that the ground levels at the Site were raised at some time during the 1950s.

Given the historic uses of the Site, some excavations and ground removal may have taken place although these are likely to have been localised. It is considered that there is a potential for archaeological remains to survive on the Site. A Desk-Based Archaeological assessment will be undertaken to review the extent of the previously disturbed ground within the Site and will be submitted with the planning application. The Desk-Based assessment will consider the requirement for potential mitigation associated with the Proposed Development.

Built Heritage, Townscape and Visual Impact

In considering the potential built heritage, townscape and visual impacts arising from the Proposed Development a clear distinction has been drawn between built heritage assets, townscape resources and visual receptors, and these are defined as follows:

- Built heritage assets include designated and non-designated heritage assets, excluding below ground archaeology;
- Townscape resources relate to the physical characteristics or components of the environment, which together form the character of the townscape, including buildings, roads, paths, vegetation and water areas; and
- Visual receptors are individuals whose views of that townscape may change as a result of the Proposed Development, e.g. residents, visitors to Bath Road shops and cafes, or transport users passing through the area.

A search of designated heritage assets on the National Heritage List for England (NHLE)¹⁵ has identified four Grade II Listed buildings within 500m radius of the Site, on which Historic England confers "particular importance". The closest Listed Building is Brent Town Hall located approximately 400m north east of the Site. These buildings are listed in Table 1 below.

There are no locally listed buildings within 500m of the Site. Wembley High Street, located 800m to the south of the Site, is designated as a Conservation Area. Barn Hill Conservation Area and Lawns Court Conservation Area are both located approximately 1km north of the Site.

Table 1. Listed Buildings within 500m of the Site

Name	Distance from the Site (m)	Designation	Description
Brent Town Hall	400m to the northeast	Grade II	Municipal offices, library and assembly hall. Built 1935-40 as Wembley Town Hall by Clifford Strange. Brick - clad steel frame; flat roof. Multi-function and sloping site expressed in T- shaped plan set around central entrance hall with council chamber above and assembly hall to rear, and library to left. Severe Scandinavian style 3-storey front. Tall central staircase tower, slightly recessed behind flanking wings, has tall window set above entrance with flat canopy and steps; 15-bay wing to right has upper windows set in tall recessed bays above continuous ground-floor windows with glazed tile piers to drip mould; bay of some height to left of tower, with similar ground-floor fenestration and large first-floor window; lower 2-storey, 4-bay range to left has similar ground-floor fenestration and tall first-floor windows. Other elevations are similar, with stepped

¹⁵ Historic England, 2019. Map search: Listed Buildings. Available: <https://historicengland.org.uk/listing/the-list/map-search?clearresults=true>. Last checked 22/1/2019.

blocks making use of sloping site: entrance with canopy to library on left; assembly hall to rear has continuous strip of low-level fenestration. Interior: marble walls and floors to entrance hall and foyer with Art Deco railings to staircase. Council Suite has 3 committee rooms separated by sliding partitions. Panelled dado to assembly hall. Circular light walls to library. Recommended as a town hall in the Scandinavian style which is an example of simple but effective 1930s municipal, planning, the interiors making much use of borrowed light and internal glazing. Pevsner called Wembley "the best of the modern town halls around London, neither fanciful nor drab".

Wembley Arena	490m to the south	Grade II	Designed by Sir E Owen Williams and built in 1934 for The Empire Games. It has a reinforced concrete frame of 3 hinged arches spanning 240 feet which was the largest concrete span in the world at that time. The pool was 200 feet long and 60 feet wide with a deck for ice skating. The end of the building opens and used to lead to sunbathing terraces and lawns. The sides have 15 massive concrete buttresses. The ends are gabled with 20 narrow lights of increasing height from the edges to the centre. Used for 1948 Olympic Games.
3 K6 Telephone Kiosks	500m to the south	Grade II	Designed 1935 by Sir Giles Gilbert Scott. Made by various contractors. Cast iron. Square kiosk with domed roof. Unperforated crowns to top panels and margin glazing to windows and door.
Wembley Hill Lodge	500m to the south	Grade II	Early 19th century cottage orné style. One storey and attic colour washed brick with gable to front. One 2 light leaded casement in gable; one 3 light leaded casement oriel window on ground floor with thatched roof. Part set back to right of one storey with continuous lean to roof in front, serving as a canopy to porch. Thatched roof. Left hand part has colour washed brick lower part; 20th century tile hanging to upper floor and tile roof. Formerly a lodge to Wembley Park.

Source: NHLE ^{Error! Bookmark not defined.}

The closest built heritage asset which may be affected by the Proposed Development is Brent Town Hall, approximately 400m to the northeast of the Site. Given that the Proposed Development includes buildings of between 10 and up to a maximum of 26 storeys in height, these residential blocks will exceed the height of the surrounding built development. Therefore, consideration will be given to the potential for likely impacts on views and the townscape character from surrounding receptors.

The WAAP identifies that the Site lies within an area designated as Wembley Park Corridor, which contains a wide variety of building typologies generally organised around the north/south spine of Wembley Hill Road/Empire Way/Bridge Road. Although there are a number of key buildings in this locality, Wembley Park Station is the principal focus for the area. The majority of this locality operates as a physical transition in scale from the large format development in the Stadium area to the wider residential suburbia. It states that "*Development in this locality [of Wembley Park Corridor] should seek to create a strong built frontage along the corridor with a range of uses and a consistent approach to the public realm. Although the scale of development should act as a transition between the larger scale of building in the Stadium area and the suburban residential context, there are also opportunities to strengthen the role of key nodes through the incorporation of signature buildings and junction improvements*".

There are no existing Public Rights of Way or other designations associated with the Site. To minimise effects on the existing townscape character, the new buildings will be sensitively laid out to avoid these being overly visually intrusive and the overall scale and appearance of the Proposed Development will aim to integrate with the sub-urban context. However, given the scale and height of the Proposed Development (with buildings of up to a maximum of 26 storeys), there is potential for townscape effects as a result of the Proposed Development. In accordance with the WAAP, the Proposed Development will avoid any impact on the protected view of Wembley Stadium from Barn Hill Open Space.

Given the maximum height of the Proposed Development and views of the Site afforded from the sensitive receptors situated along Brook Avenue and Bridge Road, temporary adverse effects on visual amenity are considered likely during construction.

A Townscape and Visual Appraisal will be submitted with the planning application to describe how the Proposed Development has been designed to minimise potential visual and townscape impacts. Additionally, the conversion of areas within the Site into residential use and open space landscaped areas will deliver an overall improvement to the public realm. The design of the Proposed Development will be of high quality and seek to make a positive contribution to the local townscape character.

It is considered that a high-quality residential scheme on the Site would be capable of enhancing the quality of the surrounding townscape. The Proposed Development presents an opportunity to improve the visual amenity of the Site in a mainly residential and commercial area and will make a positive contribution to the regeneration of the local area.

Waste Management and Recycling

The Proposed Development will alter the current waste streams and volumes arising from the Site during the construction and operational phases through the introduction of residential units and potential commercial use.

The selected construction materials and methods will minimise waste generation as far as reasonably practicable. Waste generated during construction will be managed in accordance with best practice guidance and such waste would be segregated, recycled and re-used wherever possible. A Construction Resource Management Plan (also known as a Site Waste Management Plan) will likely be prepared in response to a planning condition and will describe the strategy for the collection, storage, transport and disposal of wastes generated on-site. All waste generated during construction will be collected and disposed of by licensed waste management contractors.

Waste generated during operation of the Proposed Development will be collected and disposed of by licensed waste management contractors, with separate dedicated waste storage areas being provided for municipal waste and commercial waste from the commercial floorspace. An Operational Waste Management Strategy will be prepared for the Proposed Development in order to demonstrate how sustainable methods for waste and recycling management will be taken into implemented during operation of the Proposed Development.

It is therefore considered that no significant effects in respect to waste management and recycling will arise as a result of the Proposed Development.

Daylight, Sunlight and Overshadowing Surrounding the Site

The assessment of daylight, sunlight and overshadowing conditions considers the potential for likely significant effects caused by a reduction in available direct sunlight and daylight in adjacent properties as a result of the Proposed Development.

Policy BH13 of the Brent Local Plan advocates the following in respect of new developments, to *'provide private amenity space to all dwellings, accessible from a main living room without level changes and to take maximum advantage of daylight and sunlight. Where sufficient private amenity space cannot be achieved to meet the full requirement of the policy, the remainder should be supplied in the form of communal amenity space'*.

The Proposed Development includes buildings of a maximum height of 26 storeys and some elements of the Proposed Development will be close to surrounding residential properties. The Site is bound to the south by residential roads with properties of two storeys, as well as the adjacent two apartment blocks to the north west (7 and 9 storeys in height respectively) and therefore there is a risk these will be impacted by the proposed tall buildings (individual blocks of 11 to 16 storeys in height and a landmark building of up to 26 storeys). During the design of the Proposed Development the advice of a daylight and sunlight consultant will be sought to inform the emerging scheme design to ensure that the daylight and sunlight levels within the proposed residential units and in amenity areas within the Proposed Development will meet the required criteria and that daylight and sunlight effects in nearby properties outside the Site are minimised as far as practicable.

A daylight, sunlight and overshadowing assessment will be undertaken, and the results will be submitted as part of the planning application. Where possible appropriate mitigation will be incorporated into the design of the Proposed Development to avoid significant impacts related to daylight, sunlight and overshadowing in the surrounding area.

Wind Microclimate

Estimates from the UK Numerical Objective Analysis Boundary Layer (NOABL) data for the Site provided by RenSMART¹⁶ produce average wind speeds of 4.9m/s at 10m above ground, 5.6m/s at 25m above ground and 6.1m/s at 45m above ground in the area of the Site. These values fall within the Beaufort categories of Gentle-Moderate breeze. Such wind conditions may however vary at a local level.

The NPPF does not provide guidance on the assessment of wind microclimate, nor has any relevant local planning guidance or policy relating to wind microclimate been identified. Nevertheless, the anticipated maximum height of the Proposed Development (up to 26 storeys) has the potential to result in localised wind microclimate alterations that could affect pedestrian comfort at ground level or exert an impact together with nearby surrounding buildings. The advice of a wind microclimate specialist will be obtained to review the emerging design of the Proposed Development and advice on built development and landscape elements which can be included in the scheme design to avoid and minimise adverse wind effects arising from the completed Proposed Development.

A wind microclimate assessment of the final design of the Proposed Development will be undertaken and the results will be submitted as part of the planning application. On this basis, it is considered wind microclimate will need to be considered in regard to the Proposed Development. Appropriate mitigation will be incorporated into the Proposed Development to avoid significant impacts related to wind microclimate.

Major Accidents and Disasters

The Site is not located in an area which is anticipated to be at risk of foreseeable major disasters or accidents. The vulnerability of the Proposed Development to major accidents or disasters is likely to be related to flood risk and the potential impact that climate change may have on this. As identified previously, the Site is located within Flood Zone 1 and has a low risk of flooding. The risk of flooding at the Site will be assessed within the Flood Risk Assessment and Surface Water Drainage Strategy which will be prepared for the Proposed Development and submitted in support of the planning application. Therefore, no significant effects due to major accidents and disasters are considered likely as a result of the Proposed Development.

Cumulative Effects With Other Developments

The EIA Regulations require that the potential for direct and indirect cumulative effects during construction or operation of a development is considered. Best practice¹⁷ dictates that cumulative assessments of this nature should have regard to those schemes which are reasonably foreseeable (i.e. usually those under construction or with planning permission), with less consideration given to development proposals for which an EIA scoping report has been submitted to a local planning authority or which proposals are identified in the local development plans. Such a review can only be carried out based on publicly available information.

The commonly used threshold criteria for considering whether development schemes have the potential to result in cumulative effects are that they must:

- Be the subject of a submitted planning application or be currently under construction; AND
- Be located within an approximate 1km radius of the Site; AND

¹⁶ RenSMART Wind Speed Data. <https://www.rensmart.com/Maps>

¹⁷ PINS (2015) Cumulative Effects Assessment Advice Note <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2015/12/Advice-note-17V4.pdf>

- Result in an increase of more than 10,000m² Gross External Area (GEA) in floor area (or over 150 residential units).

A search of the LBB on-line planning portal (on 17th January 2019) has shown that there are schemes in the vicinity of the Site that meet the above criteria and therefore need to be considered.

The following schemes have been granted consent:

- Wembley Stadium Masterplan: Full planning permission was granted in December 2016 for erection of a 10-storey car park to the east of Wembley Stadium comprising 1,816 car parking spaces of which 1,642 are for non-residential purposes. (Application Ref: 15/5550) and was accompanied by an Environmental Impact Assessment. In addition, an 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, including up to 4,000 new homes was included within the application (Application Ref: 15/5550).
- Planning permission was granted in September 2017 for the redevelopment of the former Amex House site at Nos. 1 to 4 North End Road (Wembley Parade) for 195 residential units in buildings of up to 8 and 13 storeys, together with landscaped courtyard, part naturalisation of Wealdstone Brook, 16 car parking spaces and associated works (Application Ref: 16/1404). This development is located approximately 250m east of the Site.
- There is an outline planning permission for a site on Wembley Park Drive and 128 Wembley Park Drive (fountain studios), granted on 5th November 2018, for a series of buildings ranging from 8 to 25 storeys in height with a total of approximately 85,000sqm of new floorspace, to be a new Stadium Retail Park (Application Ref: 17/3059). This site is located approximately 250m south east of the Site.
- Consent was granted for the 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 on the above floors (Application Ref: 17/2782) on Parkwood House, Albion Way, approximately 300m south east of the Site.

There are some planning applications in vicinity of the Site which are awaiting determination currently, these include:

- A site at 10 and 11 Watkin Way for which an application submitted (Application Ref: 18/3381) in August 2018 for the provision of 217 residential units up to 23 storeys in height, located approximately 500m south of the Site; and
- Olympic Office Centre, 8 Fulton Road Redevelopment of the Olympic Office Site comprising erection of a part-21 and part-15 storey building comprising 253 residential units and 1,051m² of flexible retail uses (Application Ref: 17/5097), located approximately 320m to the south east of the Site.

Of the schemes identified, the closest are approximately 250m from the Site. Within the technical studies to support the planning application for the Site, consideration will be given to the future changes in the baseline conditions in the vicinity of the Site (including the introduction of new sensitive receptors within consented developments), for example in the assessment of built heritage, townscape and visual impact, wind microclimate effects and daylight and sunlight effects.

Conclusion

This letter provides a brief description of the Proposed Development and the likely significant effects on the environment in line with the requirements of Regulation 6(2) and Schedule 3 of the EIA Regulations. Whilst the Proposed Development is likely to be Schedule 2 development, with regards

to the selection criteria for screening Schedule 2 developments in Schedule 3 of the EIA Regulations, and the related guidance in the PPG, it is concluded that with the implementation of appropriate mitigation the Proposed Development is not likely to result in significant adverse effects on the environment by virtue of factors such as its nature, size or location. As such, it is considered that the Proposed Development does not constitute EIA development.

A review of planning applications that have been approved for similar developments in the local area has been undertaken. It is noted that several of these schemes have been deemed not to be EIA development, with LBB instead requesting the submission of a number of environmental reports to support the planning applications. These developments include:

- Screening Request) Land at 10-11 Watkin Road, Wembley (Application Reference:18/0099/PRE): A proposed development consisting of demolition of existing buildings and erection of a development of up to 26-storeys comprising commercial and residential uses. This scheme is located approximately 500m south of the Site.
- Screening Request: Olympic Office Centre, 8 Fulton Road: Redevelopment of the Olympic Office Site comprising erection of a part-21 and part-15 storey building comprising 253 residential units and 1,051m² of flexible retail uses (Planning Application Ref: 17/5097). This is scheme is located approximately 320m south east of the Site.
- Screening Request: Fountain Studios Fulton Road-C3 Residential; the height of which is yet to be classified but is within an area suitable for buildings of 30m or higher, circa 66,000 sqm GEA (circa 800 units), non-residential institutions and associated parking. This scheme is located approximately 300m to the south east of the Site.

Mitigation measures required to avoid significant effects and ensure that opportunities to enhance the local environment and beneficial effects from the Proposed Development will be outlined within the following technical environmental reports which will be submitted in support of the detailed planning application.

- Transport Assessment;
- Travel Plan;
- Local Air Quality Assessment;
- Noise and Vibration Assessment;
- Daylight, sunlight and overshadowing
- Wind Survey/Report
- Energy and Sustainability Strategy;
- Preliminary Ecological Appraisal;
- Arboricultural Impact Assessment;
- Phase 1 Land Contamination Assessment;
- Flood Risk Assessment and Surface Water Drainage Strategy;
- Desk Based Archaeological Assessment;
- Townscape and Visual Appraisal; and
- Operational Waste Management Strategy.

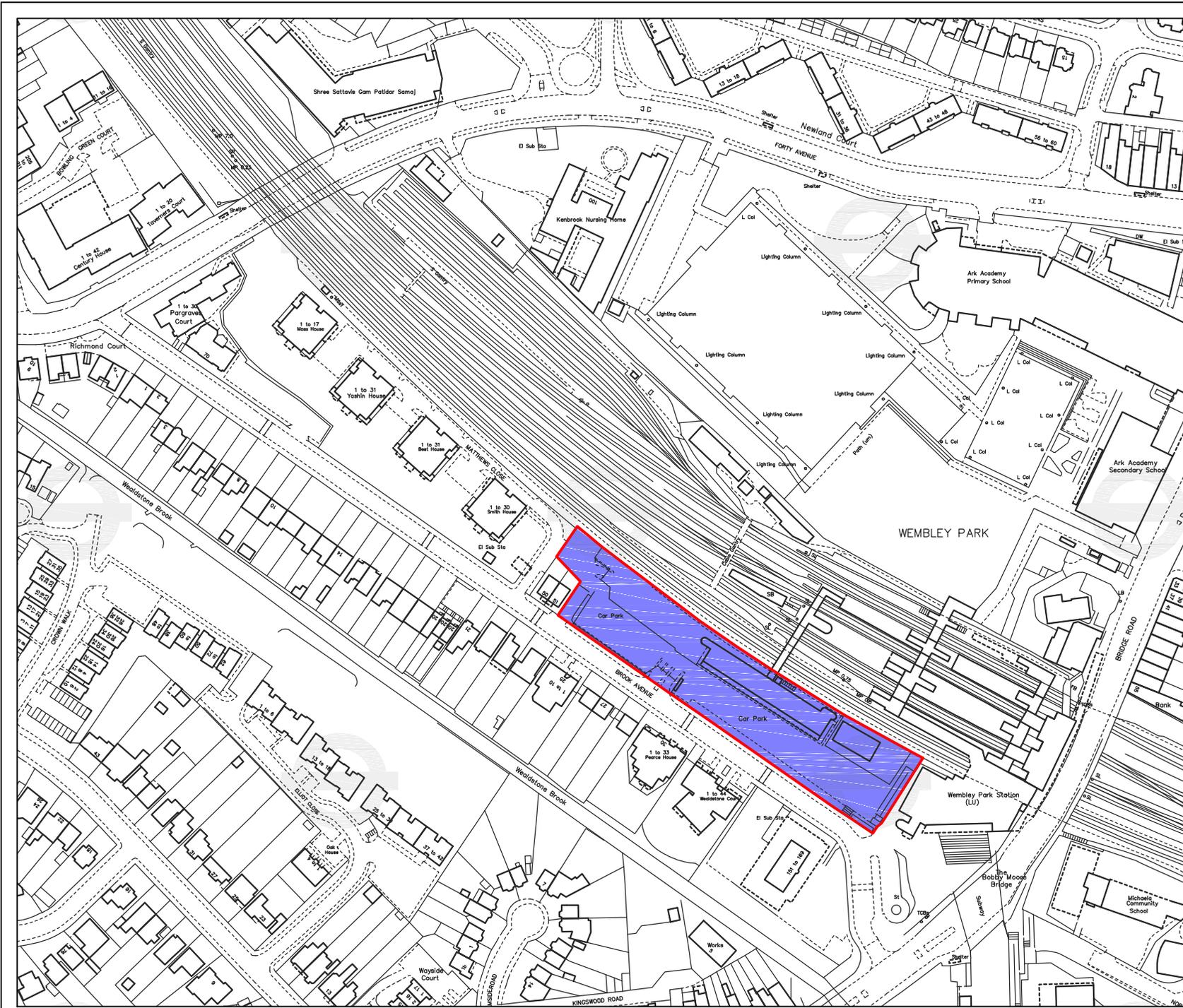
The mitigation measures, as outlined in each of the environmental technical reports, will be incorporated into the design of the Proposed Development where appropriate, or can be secured by planning condition.

We trust that this letter supplies with sufficient information and we would be grateful to receive your formal EIA Screening Opinion in line with Regulation 6(1) of the EIA Regulations within the requisite three week timescale.

In the meantime, please do not hesitate to contact us using the contact details below should you have any queries.

Associate, Environmental Planning
AECOM Infrastructure & Environment UK Limited

Appendix A Indicative Application Site Boundary



Wembley Park

Legend

 Development site



0 50 100 m

Scale at A4 1:2500
Coordinate Reference System: British National Grid

Date	07/02/2019
Initials	RS
Drg. No.	EH-WEMBLEYKDEV
Rev	2
Copyright	Neither this drawing nor any of the information it contains may be copied or communicated to third parties without written permission

Appendix B EIA Screening Process (taken from the Planning Practice Guidance web-based resource)

