

Dear Sir,

**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 the proposed full redevelopment of the site to provide up to 180 residential units and up to an additional 1000 sqm of commercial floorspace. The current proposal includes one residential tower of approximately 20 storeys (104m AOD) on the southern site (Site 1) and one residential tower of approximately 15 storeys (87m AOD) on the northern site (Site 2). The proposal will provide approximately 450 sqm of public realm, approximately 2250 sqm of private residential amenity space, cycle parking (approximately 285), disabled parking and refuse storage.

**Site:** 1-3 & 9 Watkin Road, Wembley.

I write in connection to your screening request submitted on 15<sup>th</sup> November 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**

**Description of proposed development** – Request for Screening Opinion as to whether an Environmental Impact Assessment is required for the proposed full redevelopment of the site to provide up to 180 residential units and up to an additional 1000 sqm of commercial floorspace. The current proposal includes one residential tower of approximately 20 storeys (104m AOD) on the southern site (Site 1) and one residential tower of approximately 15 storeys (87m AOD) on the northern site (Site 2). The proposal will provide approximately 450 sqm of public realm, approximately 2250 sqm of private residential amenity space, cycle parking (approximately 285), disabled parking and refuse storage.

**Site** – 1-3 & 9 Watkin Road, Wembley.

*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**

JLL requested a screening opinion from London Borough of Brent (the Council) on 15<sup>th</sup> November 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 is located between Watkin Road and Fulton Road to the northeast of Wembley Stadium. The site covers an area of approximately 0.2 ha and is separated into two parcels of land. The site comprises three single storey car garages which form part of the wider industrial area. Further industrial buildings are located to the east of the site, providing a link to the Wembley Industrial Park. An industrial unit, and sites which have recently been given permission for residential and student accommodation together with ground floor employment uses (see planning history below) are also located to the west. On the opposite side of Fulton Road is a site currently being temporarily used for parking and artificial football pitches prior to redevelopment for a residential led development. The opposite side of North End Road is residential in use.

The site is identified as part of a wider allocation for development as set out in the Wembley Area Action Plan Policy W 26 Watkin Road, itself being part of a wider Growth Area as set out in the Brent Core Strategy Policy CP 7 Wembley Growth Area. However, these policies will be superseded by the new Local Plan once adopted. The subject site is located within site allocation BCSA6: Watkin Road in the draft Brent Local Plan, which is currently going through the Regulation 19 stage of consultation. BCSA6 is currently dominated by car repair garages, accompanied by a mix of industrial, storage and ancillary office buildings and falls within the Wembley Growth Area. BCSA6 is allocated for mixed-use, residential-led development to the west of the site adjacent to other schemes which are coming forward as part of the Wembley Park masterplan, transitioning to a more commercial-led use towards the east of the site bordering Wembley Business Centre Industrial Estate. As such while the site has a mix of uses, formerly having being principally industrial / commercial in nature, it is

changing to one that is anticipated through the Brent Local Plan to become predominantly residential in character with associated commercial / cultural uses.

The site has a current PTAL rating of 4 and is approximately 400m to the south east of Wembley Park London Underground Station.

The site is located within an Air Quality Management Area (AQMA), and given current and historic industrial use, there is a risk of contamination. The site also falls within Flood Zones 3 and 2 (surface, fluvial and tidal). Wealdstone Brook runs along its northern boundary. Parts of the site are therefore considered to have a high probability of flooding. Wealdstone Brook is designated as a Grade II Site of Interest for Nature Conservation (SINC) of Borough Importance. The properties on site are not statutorily or locally listed, or within a Conservation Area. The nearest listed building is the Grade II listed Wembley Area, approximately 200m to the south west of the site.

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

The proposal is for the redevelopment of the site to provide up to 180 residential units, comprising one residential tower of approximately 20 storeys (104m AOD) on the southern side of the site (Site 1) and one residential tower of approximately 15 storeys (87 AOD) on the northern site (Site 2). The proposal also comprises up to an additional 1000sqm of commercial floorspace, approximately 2250sqm of private residential amenity space, 250sqm of public realm, approximately 285 cycle parking spaces, disabled parking and refuse storage.

### **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 to this screening opinion.

Units 1 and 3 gained permission in 1994 to be subdivided into two units each (references 96/0036 for Unit 1, and 94/1448 for Unit 3). A number of applications were approved for single storey extensions to the units, including an approval for a single storey rear extension to Unit 1A in 2004 (04/0973), an approval for a single storey rear extension to unit 3 in 1998 (97/2662), permission for a loft conversion with two side former windows to unit 3 in 2019 (19/2426), and a single storey front extension to unit 3 in 2013 (reference 13/0270). Unit 1 also received permission for the closure of access on Watkin Road and opening of an access on Fulton Road in 1994 (94/1051) and permission for a single storey extension for ancillary office use and construction of service access in 1986 (86/0025). Unit 2 received permission for a front infill extension in 2014 (14/0270). It is not clear if these extensions were implemented.

Unit 9 had received three applications for extensions in 1992 and 2004, but all applications were refused (04/1823, 04/0089 and 92/0527).

### **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:

**18/4767 – Access Storage, First Way** - Demolition of the existing building and erection of 5 buildings ranging from 10 to 24 storeys comprising 7,307 sqm of self-storage space (Use Class B8), 1,335 sqm of office space (Use Class B1) and 280 sqm of retail space (Use Class A1/A3) at ground, first and second floor levels, 555 residential units (Use Class C3) on the upper levels, new landscaping and public realm, ancillary servicing and plant, car and cycle parking, and associated works. **No date set for Committee anticipated Spring 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. **Granted 21<sup>st</sup> June 2018 and under construction.**

**18/3381 – 10 & 11 Watkin Road, Wembley, HA9 0NL** - Demolition of existing buildings and redevelopment of the site to provide 217 residential units and 789sqm of affordable workspace (Use Class B1(c)) across ground floor and first floor, in a new building ranging between 2 and 23 storeys together with associated infrastructure works including private and communal space, car parking, cycle storage and public realm improvements (revised description) subject to a Deed of Agreement dated 15th March 2019 under Section 106 of the Town and Country Planning Act 1990, as amended. **Granted 15<sup>th</sup> March 2019.** Subsequently amended by reference 19/2750 - Non-material amendment to the approved scheme to include an additional storey of accommodation and 12 additional units within the approved building envelope with associated works and fenestration improvements of full planning permission reference 18/3381 dated 15/03/2019. **Granted 09/09/2019 and under construction.**

**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. **Resolution to grant 04/07/2018, awaiting sign off S106 agreement.**

**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. **Granted 19<sup>th</sup> December 2017. Under construction.** 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 the existing building to create 90 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 create 26 flats, conversion of existing 8th floor office space to create 3 flats, creating a total of 119 self-contained flats (16 x studios, 54 x 1 bed, 13 x 2 bed and 36 x 3 bed); infilling of ground floor undercroft of existing building to form new ground floor uses comprising 753sqm of retail floorspace (A1, A3, A4) and 480sqm of office floorspace (B1), creation of first floor podium above existing car parking space to provide a landscaped amenity space for residents 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) (Revised description) **Submitted Feb 2019 Anticipated Planning Committee date 18th December 2019.**

**17/1392 – York House, Empire Way** – Prior approval for change of use at part ground floor, floors 1 to 8 and part 9th to 15 floors from office (Use class B1a) into residential (Use class C3) involving the creation of 360 studio flats with provision of communal facilities and gym on 15th floor and cycle storage on 1st floor. **Approved 23<sup>rd</sup> May 2017, and under construction. A number of further prior approval applications have been approved (18/2197; 18/1969; 17/3856) however none of these exceed the 360 dwellings approved in 17/1392. Application 19/0073 at the same site proposes the following:** Change of use of part of ninth floor (Use Class D1) to provide 9 residential units and partial demolition of existing fifteenth floor with new fifteenth and sixteenth floors to provide mixed use multi-functional leisure, co-working, provision of amenity space and external terrace to serve additional residential units in association with approved prior approval for change of use of the building to residential use (Use Class C3) – **Granted 7<sup>th</sup> June 2019 – Under Construction.**

**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 – Under Construction.**

**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. **Anticipated Planning Committee date 18th December 2019.**

**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. **Granted 7<sup>th</sup> August 2018 – Under Construction.**

**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. **Granted 7<sup>th</sup> August 2018 – Under Construction.**

**16/3408 – 1-129 Raglan Court, Empire Way -** Erection of roof extension comprising 2 additional floors over Block A and Block B to provide a total of 72 additional self-contained flats (36 x 1bed on each Block) with associated landscaping, ancillary servicing and plant, cycle parking and associated works, subject to a Deed of Agreement dated 30 August 2018 under Section 106 of the Town and Country Planning Act 1990, as amended. – **Granted 4<sup>th</sup> September 2018, not started.**

**16/1698 – Cottrell House -** Demolition of the existing mixed use building and erection of a part 6, 8 and 10 storey building comprising 55 residential units, with 2 commercial units (Use class A1) located over ground and mezzanine floors fronting Wembley Hill Rd, and associated car and cycle parking spaces, bin stores, landscaping and amenity space, subject to a Deed of Agreement dated 05/05/2017 under Section 106 of the Town and Country Planning Act 1990, as amended - **Granted 16/06/2017 - Under Construction.**

**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.**

**15/4714 – Mahatma Ghandi house, 34 Wembley Hill Road** - Demolition of existing office building and redevelopment to the site to provide a part 10 and part 21 storey building from podium level with 1,416sqm of A1 floorspace and 133sqm of flexible A1, A2 and A3 floorspace on the ground floor and 198 residential units (use class C3) above with car parking, communal and private amenity space, public realm improvements, landscaping and other associated works (revised description), subject to a Deed of Agreement dated 27 July 2016 under Section 106 of the Town and Country Planning Act 1990, as amended. **Granted 29<sup>th</sup> July 2016 – Under Construction.**

**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. Under construction.**

### **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 in the process of producing a new Local Plan. Regulation 18 took place between November 2018 – January 2019, and the final stage of consultation (Regulation 19) concludes on the 5<sup>th</sup> December 2019. Following this, it is intended to submit the Plan to the Secretary of State for examination in 2020. 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 up to 180 residential units and up to an additional 1000 sqm of commercial floorspace, approximately 450sqm of public realm and approximately 2250sqm of private residential amenity space. 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 and a secondary school.

Documentation Accompanying the Planning Application: *It is anticipated that an Air Quality Assessment and a Transport Statement and Travel Plan will accompany a planning application submission.*

### 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 and impacts are considered to be temporary.

### 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 at least an air quality neutral development can be achieved.

The supporting statement does not confirm the quantity of parking spaces which will be provided on site, but the description of development only proposes disabled parking and cycle parking (approximately 285 cycle spaces). Therefore, it appears that limited vehicle parking will be provided on site and this will consist only of disabled parking provision. This reflects the site's relatively accessible location in terms of travel by foot, cycle and public transport. It confirms that any impact to the local population arising from vehicle and pedestrian movements would be related to the commercial uses and the residential units, however sustainable methods will be encouraged through cycle parking provision and facilitated by close proximity to Wembley Park Underground Station plus bus routes.

Parking controls are likely 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. If heated by gas powered boilers, such a 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. Any building services plant / energy centre will be designed to minimise NOx emissions rates as recommended by the Mayor's Sustainable Design and Construction SPG. As such significant effects are not considered to be likely. Given the proximity of commercial to residential it is assumed that occupiers are unlikely to undertake activities that will generate potentially significant impacts on air quality. Such uses would be subject to environmental health legislation.

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

### Mitigation

The Council is likely to seek at least 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 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 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.

The supporting statement advises that detailed and careful design of the scheme will ensure that acceptable air quality is maintained to ensure that there are no significant observable impacts on nearby receptors. In addition suitable conditions associated with the Transport Statement and 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, Townscape and Visual Impact Assessment and Archaeology Report will accompany the planning application submission. The Design and Access Statement should identify the extent of local heritage and cultural assets and how the design of the development has responded to these. In addition the Townscape and Visual Impact Assessment should identify the extent to which the development impacts on skyline and protected views.*

The Site does not lie within or near a Conservation Area or an Archaeological Priority Area. Brent Town Hall, approximately 570 m north of the Site is Grade II listed. Wembley Arena (formerly the Empire Pool), approximately 470 m to the south-west of the Site 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 approximately 3.2 km to the south west of the Site. It is also close to the National Stadium Wembley which is subject to Local Plan policies seeking to protect longer distance views to it and in particular its arch.

The impact of the scale and height of the proposed buildings through the Design and Access Statement and Townscape and Visual Impact Assessment will allow sufficient clarity of impact on the setting of features of historic or cultural importance and Conservation Areas. 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 and the adjacent proposal 18/3381. 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 Design and Access Statement and the Townscape and Visual Impact Assessment.

The site has already been subject to significant urban development and 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. An Archaeology Report will be submitted as part of the planning application process. On the basis of the available information no further archaeological mitigation measures are recommended in this particular instance.

The Council considers that given the scale of the development and the urban nature of its location the proposed development would not lead to significant adverse environmental effects on heritage assets, as such an EIA is not required 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: *The following will be submitted alongside a planning application: Energy Statement; Sustainability Statement; Wind and Microclimate Assessment; Overheating Assessment.*

### **Construction**

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

## Operation

It is considered that the proposed development will be able to achieve the necessary carbon reduction targets, through actual reductions combined with financial contributions 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.

The s106 will need to be worded to ensure that any required carbon reduction off-set payments are secured.

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

## Contaminated Land

*Documentation Accompanying the Planning Application: A Phase 1 Site Investigation Report and a Contaminated Land Survey will be submitted with the application. These should 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 an historically industrial area and has been used for industrial purposes for some time and more recently as motor engineers and garages. Although the supporting statement states that the site is not known to be contaminated, based on the site's historical and current use, there is the potential for sources of contamination related to its and the surrounding land uses. To ascertain the likely level of contamination, a Phase 1 ground conditions survey / Land Contamination Survey will be submitted as the part of a planning application process as described above.

## 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. A comprehensive contamination assessment will be undertaken as part of the planning application to ensure any significant effects arising from contamination are mitigated.

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

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

Documentation Accompanying the Planning Application: *A Daylight and Sunlight Report will be submitted as part of the planning application process.*

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

#### Construction

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

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

The erection of the new buildings will generate some adverse effects as 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 of approximately 20 and 15 storeys on the site (approximately 20 storeys / 104m AOD on the southern site, and approximately 15 storeys / 87m AOD on the northern 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. Any future planning applications will be subject to an assessment of daylight, sunlight and overshadowing impacts. 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.

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: *An Arboricultural Impact Assessment, Bat Survey and Preliminary Ecological Assessment will be submitted as part of the planning application.*

The site contains no areas of statutory nature conservation and there are no such sites within the immediate vicinity of the site. There are no SPA, SAC or Ramsar designations within 5km of the Site. There is a single SSSI within 5km of the Site, namely Brent Reservoir SSSI, approximately 1.5 km north-east of the Site. Masons Field (Fryent Country Park) Local Nature Reserve (LNR) is approximately 1 km to the north of the Site and Brent Reservoir / Welsh Harp LNR is approximately 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 20<sup>th</sup> March 2019, Brent Reservoir was identified as being in favourable condition, having a good breeding bird assemblage on the open water and fen habitats across the site.

The supporting information states that there are no natural habitats on site or any other natural resources that would be directly affected by the proposals. However, the northern part of the site is located adjacent to Wealdstone Brook, which is a SINC of Borough Importance Grade II. It is not clear if there are trees within the site, however there appears to be tree canopy, potentially from trees within the SINC that extends over part of the site on its northern border. Last reviewed in 2014, the review notes that the habitat could potentially support birds, invertebrates and foraging bats. It notes that it has limited biodiversity interest, but may form a foraging or commuting route for bats and therefore has a moderate level of importance. The review also notes that the brook's associated belt of woodland serves an important wildlife corridor, with dominant tree species of Ash and Sycamore with Hawthorn and Holly.

### **Construction**

Depending on the findings of the Preliminary Ecological Assessment and Bat Survey, a range of standard mitigation measures may be required to reduce potential adverse impacts on biodiversity, such as timing of demolition/ construction activities, relocation of bats and controls on lighting.

Supporting information states that there are no natural habitats on site or any other natural resources that would be directly affected by the proposal. However, apart from the trees mentioned, the application site is adjacent to a water course, the Grade II SINC Wealdstone Brook. There is a potential risk of water contamination from run off during demolition and construction. The potential for contamination risk should be dealt with through the implementation of appropriate mitigation in the demolition and construction phase (to be secured by standard planning condition).

It is not considered that the construction of 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.

## Operation

As the existing land comprises a large warehouse and hard surfacing, 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. naturalisation of the river or enhancement of its bio-diversity, plus 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. The potential for contamination risk should be dealt with through the implementation of appropriate mitigation in the demolition and construction phase (to be secured by standard planning condition). Mitigation measures and compliance with regulatory waste disposal controls and hazardous material management would be set out in a CEMP.

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 detailed Flood Risk Assessment / Drainage Management Plan will be undertaken as part of the planning application process.*

The site is located directly to the south of Wealdstone Brook and is located within Flood Zones 2 and 3a. It is therefore considered to have a high probability of flooding. The latest Brent Strategic Flood Risk Assessment 2018 identifies that the site is predominantly located within Fluvial Flood Zone 2, with part of the site located within 3a. For surface water part is within Flood Zone 3b (highway land) and 3a (northern part of the site), with the remainder in 2.

## 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 supporting statement states that more vulnerable uses (residential) will be located towards areas of lowest risk within the site. Residential accommodation will also be located above the acceptable height threshold for development within Flood Zone 3 with pedestrian routes required to allow safe passage to areas outside the flood zone. The development will also need to be flood resilient for the non-residential built elements if it is at risk of flooding. The FRA will seek to ensure that the proposed development will not increase flood risk to



occupants and off-site. In addition, it is likely that the site will reduce surface water run-off to greenfield rates through a series of measures such as green roofs/ on site storage.

## **Mitigation**

The development will be located and designed so not to increase risk of flooding. Any potential significant effects can be mitigated through mitigations such as planning conditions or a S106 agreement. 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.

In addition to the above, the supporting information states that the proposed development will ultimately seek to improve the health of residents through the provision of open space and recreational facilities. Taking into account the above it is considered that the development will not have significant effects that warrant the need for EIA in relation to human health.

## **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**

*Documentation Accompanying the Planning Application: A Fire Safety Assessment will accompany a planning application submission.*

The supporting information states that the risk of accidents in association with the development is considered to be negligible and to have no significant environmental bearing or effect, and that the risk of such accidents / disasters will be considered throughout the design development and construction of the scheme, thereby preventing any likely significant effects. The supporting information states that mitigation measures and safety features will be incorporated into the design of the scheme to reduce the risk of major accidents or disasters, particularly in relation to fire.

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 planning application for the proposal.*

The existing roads bordering the site and nearby railway line currently are dominant sources of noise in the area. Moderate levels of noise from the adjacent light industrial uses is 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**

With the exception of disabled parking, no additional general car parking appears to be proposed as part of the development scheme. There are likely to be deliveries to residents and commercial properties as well as waste removal, but in an urban context the impacts will be limited. As such, there is not considered to be any significant effects from traffic noise.

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

There is the potential for new residents to be affected by adverse noise due to the site's location, with possible moderate levels of noise from adjacent light industrial uses and elevated levels of noise and activity during major sporting / cultural events, in addition to the evening leisure economy. The Noise Assessment should 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. The supporting information states that detailed and careful design of the scheme will ensure that acceptable noise levels are maintained. 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 and Statement of Community Involvement 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, with an associated increase in spending in the local and regional area. This is considered to be beneficial, but not significant.

#### Operation

The proposed development would create benefits to local employment though providing permanent employment once operational (through the creation of up to an additional 1000sqm of commercial floorspace). 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 unusually 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

Documentation Accompanying Planning Application: *A TV / Radio Reception Assessment will be submitted as part of the planning application process.*

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 Townscape and Visual Impact Assessment will accompany the planning application and should 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 approximately 15 and 20 storeys. One residential tower (Site 1) of approximately 20 storeys is proposed for the southern site of approximately (104m AOD) and one residential tower of approximately 15 storeys (Site 2) is proposed for the northern site (87m AOD). The proposal is therefore of a greater scale than that previously on site. The context within which it sits however currently includes tall buildings in the near vicinity, with the prospect of more. This is particularly to the south of Fulton Road as set out in the approved masterplan accompanying planning permission 15/5550. As a result building NE05 directly opposite the site has the potential to be up to 104.5 metres above proposed ground floor levels (23 storeys). In addition to this, approved permission 18/3381 is located immediately adjacent to the subject site and proposes a maximum of 23 storeys. Assessments submitted with these applications have found no significant adverse impacts related to those proposals. As such, the Council considers that although the proposed development could lead to some adverse effects on townscape and views, given the scale of the development and the urban nature of its location, significant effects are not considered likely.

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 Travel Plan and a Transport Assessment will be submitted with the planning application.*

The site is located within an area with a current public transport accessibility level (PTAL) of 4. 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.

#### 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 Travel Plan, Transport Statement and Servicing and Refuse Management Plan will set out how the site would be serviced when operational, which is consistent with an approach agreed with the local highway authority. It is not clear how much vehicle parking will be provided, but the description of development proposes only disabled parking. Vehicular on-site parking provision is therefore likely to be limited. As such, operational traffic effects of the proposals are likely to be negligible when placed within the context of the site's existing use. Increased numbers of movements related to deliveries could generate additional traffic over current levels. However, given the scale of the development, these effects are not considered to be significant. The lack of on-site car parking and lack of residents' controlled parking zone in the area will mean that suitable controls on residents potential to own/ park cars on site and in the vicinity will be expected, this is likely to include restrictions within property leases as well as financial payments towards a local parking permit scheme, which will help to mitigate any adverse effects. Advice will be required from TfL on the impact on bus and underground network capacity.

## Mitigation

A CLP should be secured that includes standard mitigation measures to control transport movements (potentially as part of the CEMP).

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 Servicing and Refuse Management Plan will be submitted as part of the planning application process. This should provide an analysis of how the development will adequately cater for the storage and collection of domestic and commercial waste during its operation will be sought. A CEMP will be sought as part of the planning process to deal with demolition and construction waste matters.*

## 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. Supporting information states that a Waste Management Plan will be produced to ensure the appropriate disposal of waste during construction phase. No significant effects are therefore anticipated.

## Operation

Supporting information states that there will not be any unusual production of waste arising from the completed development.

Separate solutions should 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.

If the application is approved, 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. The Waste Management Plan will ensure appropriate disposal of waste during construction phase.

## **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 / Drainage Management Plan, Contaminated Study and the CEMP that will be required as part of the application/ permission process.*

The site is adjacent to a watercourse, 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 Floor Risk section above) that there will be any significant effects on either water quality or hydromorphology once operational.

### **Mitigation**

A CEMP should be secured that includes measures to protect against and deal with accidental pollution events. The Contaminated Land Survey 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 and Microclimate Assessment will be submitted as part of the planning application process.*

### **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 approximately 15 and 20 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 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 need 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.