



Brent Civic Centre  
Engineers Way  
Wembley  
HA9 0FJ

TEL/MOB 020 8937 3932

EMAIL [planningstrategy@brent.gov.uk](mailto:planningstrategy@brent.gov.uk)

WEB [www.brent.gov.uk](http://www.brent.gov.uk)

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DP9

**By email**

14 February 2020

Our Ref: 19/0156/PRE

Dear Sir / Madam,

**Re: Euro House Wembley EIA Scoping Opinion.**

Thank you for your e-mail on the 23rd December 2019 requesting the Council's scoping opinion on the Environmental Statement for the redevelopment of the Euro House Wembley site. To assist, you submitted a detailed EIA Scoping Report December 2019 prepared by Trium. The Council consulted Statutory Consultees as identified in the EIA Regulations 2018 on the proposed scope. It also consulted others it considered whose input might assist in identifying a suitable scope for the submitted Environmental Statement. There was a three week period for all to respond. Consultation responses are appended. The planning related issues raised should be considered in relation to both the technical reports required in association with the application, and the proposed scope as set out in the EIA Scoping Report December 2019 prepared by Trium, such that it needs to be revised.

**Council's Scoping Opinion:**

The Council considers that the EIA Scoping Report December 2019 by Trium for the Euro House, Wembley development to be a comprehensive document which is consistent with the requirements of the regulations and associated guidance. It considers that the scope of the Environmental Assessment should be as set out in that report, in addition to that proposed within the consultation responses appended. It is agreed that for the purposes of the Assessment that it should focus on: Air Quality; Climate Change; Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare; Health; Noise and Vibration; Socio-Economics; Townscape and Visual Impact Assessment; Traffic and Transport; and Wind Microclimate.

Due to representations from the Environment Agency, Natural England and Historic England, you may wish to consider including Ecology and Biodiversity and Built Heritage. However, the Council does not think these are issues where we could envisage significant impacts due to the limited biodiversity on site / low level designations nearby, and due to the site being in an area where there are significant numbers of tall buildings between the site and heritage assets.

Other impacts are not considered to be of such likely significance that they warrant inclusion within the scope.

A summary of consultee responses can be found in Appendix A of this document.

Please do not hesitate to contact me should you require any additional input.

Yours sincerely

A handwritten signature in black ink that reads "P. Lewin". The signature is written in a cursive style with a large initial "P" and a clear "Lewin" following.

Paul Lewin  
Team Leader Planning Policy  
Tel: 020 8937 3932  
[www.brent.gov.uk](http://www.brent.gov.uk)

Regeneration and Environment | London Borough of Brent  
7<sup>th</sup> Floor Brent Civic Centre | Engineers Way | Wembley | HA9 0FJ

## APPENDIX A

### Summary of consultee responses:

#### *Air Quality (Environmental Services) –*

Have reviewed the proposed Air Quality assessment to be included within the EIA and agree with the scope of works and the methodology used within the assessment. There are therefore no comments to make in relation to the Air Quality Assessment.

#### *Environment Agency –*

- Ecology and Biodiversity:  
Do not agree that Ecology and Biodiversity should be scoped out of the Environmental Statement and believe that there are significant potential impacts from the development as well as providing a substantial opportunity to provide environmental gains. While they agree with the Preliminary Ecological Appraisal (PEA) they consider there are other impacts which have not been identified such as noise levels during and post construction which can affect species using the river and its buffer zone and sedimentation through run off during and post construction. The Wealdstone Brook also provides a corridor for many species including the bird species of note within the Brent Reservoir SSSI and any adverse impact here many impact bird populations within the SSSI. There is substantial opportunity to enhance the ecological value of the river corridor and achieve environmental net gain through development and improve the health and wellbeing of future site visitors, but the site being identified as suitable for tall buildings increases the risk of overshadowing. There are numerous potential smaller impacts that could have a cumulative and significant effect on ecology and biodiversity across the river catchment. The EIA should go further than the recommendations of the PEA to include WFD screening assessment and an assessment of Biodiversity Net Gain.
- Flood Risk:  
The site boundary is partially located in FZ2 and 3 but the EA would have no objections in principle providing the site-specific sequential approach is applied locating all built development in the areas with the lowest risk of flooding. While the EA are happy to see a 10m buffer zone from Wealdstone Brook, an 8m setback from the top of the river bank is required rather than from the edge of the river channel and this buffer is expected to be kept free of structures and hard landscaping as much as possible. Provided this buffer is managed appropriately and access is provided for emergency maintenance and repair works, flood risk is not a significant issue. Flood risk aspects of the proposal can be addressed through Environmental permit regulations.
- Water Efficiency:  
Endorse the use of water efficiency measures especially in new developments. Water efficient technology, fixtures and fittings should be considered as part of new developments. New residential developments are required to achieve a water consumption limit of 125 litres per person per day unless in an area of serious water stress, where a maximum of 110 litres per person per day applies. Recommend that new non-residential development of 1000sqm gross floor area or more should meet BREEAM 'excellent' standards for water consumption.
- Groundwater and contaminated land:  
Agree that groundwater can be scoped out of the Environmental Statement – while there may be some legacy contamination, the site does not lie above any sensitive groundwater receptors and it is agreed that the risk to controlled waters is low.

*Greater London Archaeological Advisory Service (GLAAS)*

Having considered the proposals, it is concluded that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest, and agree with the scoping opinion that archaeology be scoped out of the EIA.

*Historic England –*

Consider that Built Heritage should be scoped into the EIA. The development could potentially have an impact on a number of designated heritage assets and their settings in the area around the site, and would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposal might have on those elements which contribute to the significance of these assets. Would also expect the Environmental Statement to consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest.

Given the heights of the structures associated with the proposed development and the surrounding landscape character, this development is likely to be visible across a very large area and could, as a result, affect the significance of heritage assets at some distance from the site. They therefore expect the assessment to demonstrate the extent of the proposed study area is of an appropriate size to ensure that all heritage assets likely to be affected have been included and can be properly assessed. Assessment should be designed to ensure all impacts are fully understood (section drawings and techniques such as photomontages are useful).

Assessments should also take into account the potential impact which associated activities (e.g. construction, servicing / maintenance, associated traffic) might have upon perceptions, understanding and appreciation of heritage assets in the area, and where appropriate, the likelihood of alterations to drainage patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.

Emphasise that further consultation, directly with the London Borough of Brent's Conservation Officer and GLAAS, be made.

*Land Contamination (Environmental Services) –*

The report comprises a Phase I desk study and Phase II geo-environmental ground investigation and the report provides a satisfactory assessment of the site to date given the current levels of access. The current ground investigations are limited and do not provide a complete picture of the potential level of contamination present at the site. Additional site investigation as recommended is required to further characterise the made ground and address potential sources of contamination beneath the existing structures.

*Natural England –*

The proposal does not appear to affect any nationally designated geological or ecological sites or landscapes or have significant impacts on the protection of soils, nor is the development for a mineral or waste site over 5a. At present it is not a priority for Natural England to advise on the detail of this EIA, but would like to draw attention to some key points. Natural England would expect the final Environmental Statement to include all necessary information as outlined in Part 4 of the Town & Country Planning (Environmental

Impact Assessment) Regulations 2017. Some key points / advice related to EIA Scoping Requirements are:

- Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) sets out necessary information to assess impacts on the natural environment to be included in an Environmental Statement, including 1) a description of the development; 2) a description of reasonable alternatives; 3) a description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof; 4) description of the factors specified in regulation 4(2) likely to be significantly affected by the development; 5) a description of the likely significant effects of the development on the environment; 6) description of the forecasting methods or evidence used to identify and assess the significant effects on the environment; 7) description of measures envisaged to avoid / prevent / reduce / offset any significant adverse effects on the environment and if appropriate any proposed monitoring arrangements; 8) description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents / disasters.
- Ecological Aspects: Potential impact upon features of nature conservation interest and opportunities for habitat enhancement / creation should be included within the assessment in accordance with appropriate guidelines.
- Internationally and Nationally Designated Sites: The proposal is located outside identified geological buffer areas within which development is likely to affect designated sites, and is therefore unlikely to affect an Internationally or Nationally designated site. However, it should be recognised that a proposal may have the potential to lead to significant impacts arising at a greater distance than is encompassed by Natural England's buffers. The ES should assess the potential for designated sites to be affected (SACs, SPAs, Ramsar sites and SSSIs). Should the proposal result in an emission to air or discharge to the ground or surface water catchment of a designated site then the potential effects and impact of this would need to be considered in the ES.
- Protected Species: The ES should assess the impact of all phases of the proposal on protected species. Consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area.
- Regionally and Locally Important Sites: The ES should assess any impacts upon non-statutory sites e.g. local wildlife sites and local nature reserves.
- Biodiversity Action Plan Habitats and Species: The ES should assess the impact of the proposals on habitats and / or species listed in the UK Biodiversity Action Plan.
- Landscape and Visual Impacts: Consideration of landscape impacts should reflect the approach set out in Guidelines for Landscape and Visual Impact Assessment, the Landscape Character Assessment Guidance for England and Scotland, and good practice. It should include the cumulative effect of the development with other developments. NE would expect this cumulative assessment to include those proposals currently at Scoping stage. The assessment should refer to relevant National Character Areas.
- Access and Recreation: The ES should assess the development's effects upon public rights of way and access to the countryside and its enjoyment through recreation. Landscape and visual effects on Open Access Land should be included. NE would expect to see consideration of opportunities for improved new public access provision to the site.
- Land Use and Soils: Impacts from the development should be considered in light of government policy for the protection of the best and most versatile agricultural land set out in the NPPF. NE also recommends that soils be considered under a more general heading of sustainable use of land and the valuing of the ecosystem services they provide. It is also important that soil resources are protected and used

sustainably. Development of buildings prevents alternative uses for those soils that are permanently covered and often results in degradation, affecting their functionality as a wildlife habitat. Sealing and compaction can contribute to increased surface water run-off, ponding, flooding, localised erosion and pollution.

- Air Quality: Assessment should take into account risks of air pollution and how these can be managed or reduced.
- Climate Change Adaptation: The ES should reflect the principles of the England Biodiversity Strategy and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires the planning system to contribute to the enhancement of the natural environment and this should be demonstrated through the ES.

#### *Noise Nuisance (Environmental Services) –*

Acknowledge the EIA Scoping Opinion Request and raise no concerns at this preliminary stage. In the event that full applications are submitted we will consider the proposals in terms of internal noise and vibration criteria; plant noise; commercial noise; community facilities; retail and leisure facilities; energy centres etc.

#### *Thames Water –*

Consider that the following issues should be considered and covered in either the EIA or planning application submission: 1) the development's demand for Sewage Treatment and network infrastructure both on and off site and can it be met; 2) the surface water draining requirements and flood risk of the development both on and off site and can it be met; 3) build-out / phasing details to ensure infrastructure can be delivered ahead of occupation; 4) any piling methodology and will it adversely affect neighbouring utility services.