

Charlotte Ashton
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Brent Council

Our ref: NE/2020/131346/01-L01

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Dear Charlotte,

EIA Scoping Opinion - Demolition of existing buildings on site and the construction of a mixed-use development comprising of 5 buildings containing residential, hotel, retail, industrial uses, and associated amenity spaces. The buildings will range in height between 11 and 23 storeys. The proposed development is anticipated to comprise: approximately 5300 sqm gross internal area of flexible B1(c)/B2/B8 floorspace, approximately 400-450 residential units including provision of affordable homes, a hotel with approximately 150-300 keys, servicing facilities, parking, plant space, associated landscaping and amenity spaces.

Euro House, Wembley, Brent

Thank you for consulting us on the above scoping opinion. Please find our comments below in relation to the site and the submitted *Euro House Wembley EIA Scoping Report, dated December 2019*.

Ecology and Biodiversity

We do not agree with the findings of the Scoping Report with regards to the scoping out of ecology and biodiversity from the Environmental Impact Assessment (EIA). We believe there are significant potential impacts from the development as well as providing a substantial opportunity to provide environmental gains and achieve the aims of the emerging Brent Local Plan 2020.

Some of the potential impacts have been identified in *Scoping Report, Appendix E, Preliminary Ecological Appraisal (PEA)*. These are light pollution, which can affect the natural rhythms for all species using the river and its buffer zone, as well as the potential for the spread of Invasive Non Native Species during construction and through inappropriate management. Japanese Knotweed has been identified on site and is known to be common along this stretch of the Wealdstone Brook. Whilst we agree with these aspects of the Preliminary Ecological Appraisal (PEA), there are other impacts that have not been identified. Aspects such as noise levels both during and post construction which can affect species using the river and its buffer zone, and

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sedimentation through run off, both during and post construction, which will currently not be addressed as part of the EIA with respect to ecological and water quality aspects.

It is also of note that the river provides a corridor through the landscape for many species including the bird species of note within Brent Reservoir SSSI and any adverse impact here may have an impact on bird populations within the SSSI.

In addition to the potential impacts, there is also a substantial opportunity to enhance the ecological value of the river corridor and achieve environmental net gain through development, as well as the potential for the river to improve the health and wellbeing of future site visitors and users through the provision of natural open space. This is in line with the aims of policy CP 18 of the *London Borough of Brent Core Strategy, Adopted 12th July 2010* and the site specific recommendations of site allocation *BCSA4: Fifth Way/Euro Car Parts* in the emerging *Brent Local Plan 2020*.

The *BCSA4: Fifth Way/Euro Car Parts* site allocation suggest this location has been identified as suitable for tall building which increases the risk of overshadowing, as well as recommending developers are required to contribute towards restoration and naturalisation of the Brook, improve access to the waterway, provide appropriate landscaped setback, enhance water quality and biodiversity.

Whilst we agree with the recommendations in the Preliminary Ecological Appraisal, and we are pleased this will form part of the EIA with the recommendations made being incorporated into the future proposal, we believe Ecology and Biodiversity should still be scoped into the EIA. This is on the basis that there are numerous potential smaller impacts that could have a cumulative and significant effect on ecology and biodiversity across the river catchment and addressing these aspects within the EIA will help achieve the aims of the Brent Local Plan. We believe the EIA should go further than the recommendations in the PEA to include **WFD screening assessment** and an assessment of **Biodiversity Net Gain** to fully establish potential improvements to the Wealdstone Brook, the river buffer zone and the future wellbeing of site users.

Water Resources, Drainage and Flood Risk

Flood Risk

The majority of the site is located within Flood Zone 1 which is land defined by the Planning Practice Guidance as having a low probability of flooding. The site boundary is partially located within flood zone 2 and 3, however we 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. Based on the Scoping Report it appears the development footprint will be contained to FZ1.

We are happy to see that the proposed development plans will provide a 10 metre buffer zone from the Wealdstone Brook, however it is worth noting that we require an 8 metre set back from the top of the river bank, rather than from the edge of the river channel. In addition we expect this buffer zone to be kept free of structures and hard landscaping as much as possible, which supports the London Borough of Brent local plan objectives to protect and enhance the environment. Provided this buffer zone is managed appropriately and sufficient access is provided for emergency maintenance and repair works, we do not consider flood risk to be a significant issue. The flood risk aspects of the proposal, specifically the protection of the flood defences and river channel, can be suitably addressed through Environmental permit regulations which

require any works within 8 metres of a main river to obtain a Flood Risk Activity Permit prior to the commencement of works.

Water Efficiency

Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments.

All new residential developments are required to achieve a water consumption limit of a maximum of 125 litres per person per day as set out within [the Building Regulations & \(Amendment\) Regulations 2015](#).

However, we recommend that in areas of serious water stress (as identified in our report [Water stressed areas - final classification](#)) a higher standard of a maximum of 110 litres per person per day is applied. This standard or higher may already be a requirement of the local planning authority.

We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption. We also recommend you contact your local planning authority for more information.

Groundwater and Contaminated Land

We agree with the findings in the EIA Scoping Report that groundwater can be scoped out of the Environmental Statement. Whilst there may be some legacy contamination from previous industrial uses, the site does not lie above any sensitive groundwater receptors and we therefore agree the risk to controlled waters is low.

Thank you again for consulting us. If you have any queries regarding our response please get in touch at HNL SustainablePlaces@environment-agency.gov.uk.

Yours sincerely,

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Planning Advisor

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