Dear Sir

TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2011

SCREENING OPINION REQUEST

PROPOSED THEATRE, OLYMPIC WAY, WEMBLEY FOR IMAGINE NATION

Our client, Imagine Nation, will shortly be submitting a planning application for a proposed temporary theatre on part of the site of the former Palace of Industry, Olympic Way, Wembley. The exact site demise is yet to be confirmed but is likely to fall within the approximate area identified on the enclosed illustrative Site Plan (Ref: P-Z1-00-LP) and is circa 0.63ha ha in size.

In accordance with Regulation 5(1) of the EIA Regulations, we request that the London Borough of Brent provides a formal Screening Opinion to confirm whether or not it is considered that the proposed scheme comprises environmental impact assessment (“EIA”) development. This request is made pursuant to Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011.

1. Outline of the Proposed Development

The planning application is intended to be made in full. The exact description of development is to be finalised. Nevertheless, it is expected that the “Proposed Development” will be within the parameters and principles set out below:

- The construction of a prefabricated theatre building of approximately 4,200 sqm;
- The theatre will have a seating capacity for approximately 1100 people;
- In addition to the theatre, there will be a 1,200 sqm foyer (probably fronting onto Olympic Way) containing, inter alia, a café/restaurant/bar and toilets, and a 400 sqm service area.
- A 1000 sqm external backstage space may also be created;
- The new building will be approximately 15m in height;

56 Queen Anne Street, London, W1G 8LA.
Tel: 0207 317 3110 Fax: 0207 317 3111 E-mail: info@signetplanning.com www.signetplanning.com
Registered in England No. 5249335
• The main pedestrian access to the site is likely to be from Olympic Way, with vehicular servicing access from Fulton Road; and
• The development is proposed to be in place for ten years as a meantime development in advance of the full build out of the North West Lands Masterplan on this land, (permitted under Brent planning application reference 10/3032 and amended under reference 13/1323), which will take a number of years to develop in full.

To assist your consideration of this screening request, we provide the following illustrative masterplan drawing:

• Site Plan (Ref: P-Z1-00-SI)

The wider site is the subject of a planning permission for a temporary car park (permitted and implemented under application ref: 12/3361). Those parts of the car park beyond the Imagine Nation theatre will remain in situ and operational, surrounding the theatre site.

The proposed theatre is designed with the sets built around a rotating auditorium allowing the audience to rotate from scene to scene. The constructional loads are designed to the floor, therefore, the demands on the building itself are low providing the opportunity of using a temporary or semi-permanent building.

The theatre will be the home of a single show and thereafter servicing demand will be limited.

No car parking is proposed as part of the development. The site is well located close to public transport and any car parking demand can be accommodated within the existing LDO car parks close by.

**Requirement for EIA**

The proposals do not fall under the definition of Schedule 1 development and therefore there is not an automatic requirement for EIA. Schedule 2 of the Regulations defines development thresholds over which EIA Screening will be required. The site area is 0.63ha and thereby qualifies for inclusion as a potential Schedule 2 development, described as an ‘urban development project’ under the above regulations.

For all Schedule 2 developments the Local Authority must make its own formal determination of whether or not an EIA is necessary for the Proposed Development by virtue of its size, nature and location. In making this determination the Local Authority must take into account the relevant ‘selection criteria’ set out in Schedule 3 of the Regulations to determine the possibility of significant adverse effects on the local environment.
The NPPG Annex on indicative screening thresholds (which replaces Circular 02/99) makes it clear that "Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination".

The 2011 Regulations establish the following criteria that must be taken into account in determining whether a Schedule 2 development is likely to have significant effects:

- Characteristics of development;
- Location of development; and
- Characteristics of the potential impact.

To enable your consideration of this issue, we set out below the following information:

**Characteristics of the development (such as size, cumulative effects, use of natural resources, production of waste, pollution and nuisances, and risk of accidents)**

**Size**
Based upon the initial plans and brief for the project, the Proposed Development will comprise a prefabricated building of approximately 5,000 sqm including a revolving auditorium, backstage space, foyer and front of house service area.

**Cumulative Effects**
The Proposed Development will reduce the existing operational temporary car park, however this will occur as the permitted North West Lands development is built out, phase by phase, in any event. Visitors to the theatre will be directed towards public transport as the primary means of transport.

The North West Lands development has already been subject to an environmental impact assessment, and as mentioned above, will be built out in phases over many years.

The Proposed Development will be a visitor attraction but is expected to benefit from linked trips with the Arena, Stadium, LDO and other parts of the emerging Wembley development. As mentioned above, no additional car parking is proposed with the theatre.

Given the above and the relatively small scale nature of the proposal, it is not considered that the proposed scheme would result in cumulative effects which give rise to the need for EIA. The Proposed Development is not complex or hazardous and will therefore have only localized environmental effects.

**Use of Natural Resources and Production of Water**
The development will not result in the loss of resources considered to be scarce. The energy efficiency of the development will be in line with local and national policy requirements. The development will be designed to a BREEAM Excellent standard, as much as is feasible.
The use of natural resources will be typical for an urban development project such as that proposed, as will the production and management of waste. Waste and recycling collection services will take place from a dedicated area within the site. The level and method of waste and recycling is not expected to be significant.

**Pollution, Nuisances and Risk of Accidents**
The construction of the new theatre will be pre-fabricated off site and transported to site for ease of construction. Given the non-hazardous materials associated with the construction of the proposed theatre, the effect of pollution and nuisances will be low. Likewise, the risk of accidents will be low, managed in accordance with Health and Safety Regulations by the development contractor and therefore are not significant.

Impacts associated with construction (including vehicular movements, noise and dust) will be localised and temporary and, with the implementation of best practice and legislative requirements, will not give rise to any irreversible effects on the environment.

The construction contractor will adhere to environmental health/ noise requirements that are typically imposed upon such development projects in compliance with necessary planning conditions imposed on any grant of planning permission.

The proposed use will not produce significantly different levels of pollution when compared to the existing car park use, which will be retained around the development.

A noise assessment report will be submitted with this planning application in order to assess the impact of the theatre on residential uses in the vicinity.

**Location of the development (by reference to the environmental sensitivity of the area)**
The Site is not within an environmentally sensitive area as defined with the Regulations.

The Proposed Development will not affect the absorption capacity of the natural environment (as demonstrated below). The Site is located within Flood Zone 1 and therefore is at a low risk of flooding from a fluvial or tidal source. The Site comprises previously developed land, with an impermeable surface throughout. The principle of development on this site was originally established under the NWL outline permission whereby development was established as acceptable in flood risk terms. Furthermore, given the scale of the proposals (falling under 1ha), a Flood Risk Assessment will not accompany the planning application.

The Site is not located within an Archaeological Priority Zone.
The Site is located within an Air Quality Management Area, in respect of exceedences of the Air Quality Strategy mean objective for nitrogen dioxide (NO2) and the daily mean objective for particulate matter (PM10). However, as stated above, construction effects (including vehicular movements, noise and dust) will be localised and temporary and, with the implementation of best practice and legislative requirements, will not give rise to any irreversible effects on the environment.

The Site itself is of extremely limited ecological value, there are no statutory designated sites of nature conservation importance within or adjacent to the Site.

Characteristics of the potential impact (having regard in particular to the extent of the impact, its transfrontier nature, magnitude and complexity, probability and duration, frequency and reversibility).

The main environmental effects likely to result from the Proposed Development are considered below, along with an assessment of whether these would be significant effects (individually or cumulatively) on the environment.

i.   Transport

It is considered that the Proposed Development is not likely to result in significant effects on the environment in terms of transport matters, as no car parking is proposed, and visitors can use existing LDO car parks. The development is well located close to public transport and visitors will be actively encouraged to use public transport. A separate Transport Assessment is to be submitted with the planning application.

ii.   Ecology

The North West Lands development, of which this site is part, has been subject to an environmental impact assessment and no significant issues were identified.

In this respect, it is considered that the Proposed Development is not likely to result in significant effects on the environment in terms of ecology.

iii.   Landscape and Visual Impact

The Proposed Development is to be designed within the height parameters of the permitted North West Lands development and is a temporary meantime development. In this respect, it is considered that the Proposed Development is not likely to result in significant effects on the environment in terms of landscape and visual impact.

Notwithstanding, a separate townscape/views assessment may be submitted in any event, depending on the exact siting of the proposed theatre building.
iv. Cultural Heritage and Archaeology

The North West Lands development, of which this site is part, has been subject to an environmental impact assessment and no significant issues were identified, in this regard.

In this respect, it is considered that the Proposed Development is not likely to result in significant effects on the environment in terms of cultural heritage and archaeology matters.

v. Ground Conditions

The North West Lands development, of which this site is part, has been subject to an environmental impact assessment and no significant issues were identified.

In this respect, it is considered that the Proposed Development is not likely to result in significant effects on the environment in terms of ground conditions.

vi. Hydrology and Hydrogeology

The North West Lands development, of which this site is part, has been subject to an environmental impact assessment and no significant issues were identified.

In this respect, it is considered that the Proposed Development is not likely to result in significant effects on the environment in relation to hydrology and hydrogeology matters.

Conclusion

Having considered the selection criteria for screening a Schedule 2 development in accordance with Schedule 3 of the EIA Regulations, as set out above, it is concluded that the proposed development is not likely to have significant effects (individually or cumulatively) on the environment based upon the following:

(1) no predicted environmental effects that would be of above local importance in scale;

(2) the site is not identified as being located in a particularly environmentally sensitive or vulnerable area;

(3) the development would not generate any unusually complex or potentially hazardous environmental effects;

(4) there are no existing or approved developments in close proximity to the site which have the potential, alongside the Proposed Development, to result in adverse environmental cumulative impacts.
In this respect, we conclude that the proposed theatre at Olympic Way, Wembley does not comprise EIA development for the purposes of the EIA Regulations and the planning application need not be accompanied by an ES.

The planning application will be accompanied by a number of reports, including those dealing with specific environmental topics, and these are listed below:

- Transport Assessment;
- Travel Plan;
- Design and Access Statement;
- Noise Assessment; and
- Planning Statement.

Studies from the NW Lands planning application on ecology, ground conditions, water, ecology, archaeology and air quality will also be submitted with the planning application.

We trust the above provides sufficient information for the Council to draw its own conclusions in this respect and look forward to your confirmation within the statutory 21 day period that the development does not constitute EIA development. In the meantime, should you have any further queries in relation to this matter then please do not hesitate to contact us.

Yours faithfully
for Signet Planning

PAULA CARNEY
Director

Encs