Bridge Park, Brentfield Road, London, NW10 0RH

Town and Country Planning (Environmental Impact Assessment) Regulations 2017- Scoping Request Report

Stonebridge Real Estate Development Ltd and London Borough of Brent

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Basis of Report

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1.0 Introduction

1.1 Purpose of Report

This Scoping Request Report has been prepared by SLR Consulting Limited (SLR) on behalf of Stonebridge Real Estate Development Ltd (SRED) and London Borough of Brent (LBB) ('the Applicants') to facilitate the adoption of a Scoping Opinion by LBB to guide the content of any subsequent application submission for:

"Hybrid planning application for phased mixed-use development for the provision of 13 blocks of 3 to 34 storeys to include up to 872 residential units, assisted living, adult learning facility, affordable workspace, a hotel and community leisure centre comprising:

Full application for the demolition of Bridge Park Community Leisure Centre and Technology House, conversion and upward extension of Unisys Block A to a circa 255 bedrooms hotel and aparthotel (Class C1) with a restaurant on the ground floor, conversion and upward extension of Unisys Block B to circa 110 residential units (Class C3). Construction of a New Community Leisure Centre (Class E(d)) and a block up to 14 storeys to provide assisted living (Class C2), adult learning facility (Class F1a) and affordable workspace (Class E(g)). With associated energy centre (Sui Generis), parking, access, landscaping and amenity spaces.

Outline application for the erection of nine blocks (Blocks C to K) for circa 762 residential units (Class C3), circa 118sqm of flexible retail and café space (Class E), circa 127sqm of community space (Class F2b), basement, associated landscaping and access, amenity space, parking and other associated works, with all matters reserved (except access)."

The subsequent Scoping Opinion adopted by LBB will assist the preparation of any forthcoming Environmental Impact Assessment (EIA) prepared to support the development. Furthermore, more detailed information regarding the development proposals is provided within Section 4.0 below.

This Scoping Request Report outlines the statutory context of the submission, a description of the site location and existing land use, information on the proposed development works, a description of the environmental setting of the site (i.e. identifying any sensitive receptors) and any likely significant effects, as well as providing a suitable scope and methodology for undertaking the various technical assessments that would be contained within the EIA.

1.2 The Applicant & Landownership

1.2.1 Landownership

Currently SRED own approximately 11,460 sqm of the site, the LBB own approximately 15,520 sqm which include the scrapyard area.

Stonebridge Real Estate Development Limited is a special purpose vehicle which has been established by GMH for the purpose of delivering the redevelopment of the wider Brentfield Road site. The requisite Article 13 Notification will be issued upon the Council at the time of the application submission.

1.2.2 Stonebridge Real Estate Development Ltd

Stonebridge Real Estate Development Ltd (Stonebridge) is a commercial real estate development and investment company based in London, UK. They provide the highest level of service, quality, ethical standards, and results for their clients. They also build and sell or lease buildings to corporate user clients and we also build-to-suit for clients on a lease and design construct basis.

1.2.3 General Mediterranean Holding Group

General Mediterranean Holding Group (GMH) was established in 1979. GMH are a strong and diverse business group with activities in Banking and Finance, Real Estate and Construction, Hotel and Leisure, Industrial, Trading and Pharmaceuticals, Communications and IT and Aviation.

GMH's interests span across the Mediterranean and beyond with over 130 companies employing some 11,000 staff with representation in the Middle East, Northern Africa, Europe, the Americas, the Caribbean, the Asia Subcontinent, and the Pacific Rim. The Group's consolidated Assets now exceed US$ 4 billion.

1.2.4 The London Borough of Brent Council

The 'LBB' own approximately 15,520 sqm of the Site. The London Borough of Brent is the freeholder of Bridge Park Community Leisure Centre, Technology House and the Scrapyard. The Council operates the centre as a public leisure centre which also includes business units and community uses. The overall development has been designed holistically; however, the Sports Centre and NAIL are being brought forward by LBB. This part of the Site would be managed and maintained by LBB.

1.2.5 SLR Consulting Limited

Established in 1994, SLR is a dynamic, responsive and a fast-growing environmental consultancy with an unrivalled reputation for providing high quality tailored services. With offices in Europe, Australasia, South Africa, and North America, we provide global advice and support on a wide range of strategic and site-specific environmental issues to a diverse and growing base of business, regulatory and governmental clients.

SLR has a strong planning and EIA team, with all senior members of the team professionally qualified (RICS or RTPI) and many have acted as Expert Witnesses at Public Inquiries. SLR is recognised by the Institute of Environmental Management and Assessment (IEMA) as a recommended consultancy to prepare and review Environmental Statements ('ES') for Environmental Impact Assessments ('EIA'). Further information on SLR can be found on its corporate website at www.slrconsulting.co.uk.

1.3 Report Structure

The Scoping Request Report is structured as follows:

- Section 2 – Background & Legislative Context;
- Section 3 – Site Location & Land Use;
- Section 4 – Description of Development;
- Section 5 – Approach to Environmental Statement
- Section 6 – Environmental Issues to be 'Scoped In';
- Section 7 – Environmental Issues to be 'Scoped Out'; and
- Section 8 – Closure.

2.0 Background & Legislative Context

This section of the document seeks to detail the background of the submission of this Scoping Request Report and how the content of this report interrelates to the requirements laid out within the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('the Regulations').

Each section below provides the pertinent background information and requirements for the preparation of any subsequent EIA in support of the development proposals.

2.1 Legislative Requirements for EIA Scoping

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('the Regulations') came into force on 16th May 2017. The findings of the Environmental Impact Assessment undertaken on the proposed development will be reported in an Environmental Statement ('ES') prepared in accordance with Regulation 18 and Schedule 4 of the Regulations.

2.1.1 EIA Screening

In accordance with Regulation 6(1) of the Regulations, a person who is minded to carry out development may request the relevant planning authority to adopt a Screening Opinion.

The proposed development falls to be considered under Schedule 2 Class 10 ('Infrastructure Projects'), sub-class (b); 'Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas. The applicable thresholds for Class 10(b) are as follows:

- The development includes more than 1 hectare of urban development which is not dwellinghouse development; or
- The development includes more than 150 dwellings; or
- The overall area of the development exceeds 5 hectares.

The applicable thresholds identified are not definitive and there are instances where a development exceeds these levels but is not deemed to be considered EIA Development as it is unlikely to give rise to significant effects (and vice versa). Nevertheless, the Applicant acknowledges the scale and environmental sensitivity of the proposed application site. On this basis, no EIA Screening exercise has been undertaken and it is proposed by the applicant to undertake an EIA on a voluntary basis.

2.1.2 EIA Scoping

In accordance with Regulation 15 (1) of the Regulations, a person who is minded to make an EIA application may ask the relevant planning authority to state in writing their opinion as to the scope and level of detail of the information to be provided in the environmental statement (a 'Scoping Opinion').

Regulation 15 (2) continues by confirming that a Scoping Request must include:

- A plan sufficient to identify the land;
- A brief description of the nature and purpose of the development, including its location and technical capacity;
- An explanation of the likely significant effects of the development on the environment; and

- Such other information or representations as the person making the request may wish to provide or make.

The above information is provided within the subsequent sections of this Scoping Request Report. When detailing the topics to be 'Scoped In' to the EIA, information has been provided regarding any key legislative, guidance, planning policy or background information that has informed the methodology proposed. The report also details the baseline and methodology of the assessments considered necessary to assess the environmental impact of the proposed development. Topics or areas of assessment proposed to be 'Scoped Out' are also identified where appropriate and justification for their exclusion provided. In addition to the above, Section 5 of this report also details the 'Approach to the EIA', including overarching methodological approaches relating to the structure and format of the Environmental Statement, consideration of alternatives and the assessment of cumulative impacts.

2.2 The Scoping Exercise

When forming a Scoping Opinion, the Council should be proportional in their approach to the EIA. It should be remembered that there are three main purposes in undertaking the scoping exercise:

- To focus the EIA on the environmental, social, and economic issues and potential impacts which need the most thought and attention;
- To provide a means to discuss methods of impact assessment and reach agreement on the appropriate way forward; and
- To identify those issues which are unlikely to need detailed study and will not, therefore, form part of the EIA.

The Scoping process should address the concerns of all those likely to be affected by the proposals, including statutory and non-statutory consultees, and the public. Good practice also requires that the opinion of stakeholders should also be sought at this stage. Stakeholders should be asked to identify their concerns, sources of and gaps in information, and additional options or sites that may not have been considered.

The content of this report is intended to provide the Council and the relevant consultees with the information necessary to come to an opinion on the issues that should be addressed in the ES. The value of all consultees and stakeholders in inputting into the Scoping Opinion is recognised by the Applicants and SLR, and both parties will be pleased to discuss any aspect of the proposed scheme with any relevant organisation.

2.3 Pre-Application Consultation

Pre-application consultation has been undertaken with officers from LBB and Quality Review Panel (QRP). This consultation has included both formal and informal correspondence to discuss the development design, environmental considerations, and likely technical assessment requirements. The content of these pre-application consultation meetings and correspondence with professional officers has informed the scope and methodology of the various topics considered within Sections 6 and 7 of this Scoping Request Report. A pre-application is being prepared and will be submitted to the GLA for commentary.

Revisions to the leisure, community and NAIL proposals were included and the Council's Cabinet approved this facility mix in February 2019. There has been a significant gap in time from this date to the submission of this report owning to legal challenges over the ownership of the site. This was resolved in the Council's favour in 2022. It is anticipated that public consultation will be held in 2024, including a public exhibition, newsletters, and a website.

Further information on these public consultation events will be provided as part of any subsequent planning application submission.

3.0 Site Location & Land Use

This section of the Scoping Request Report provides a description of the proposed applications site, including its location, wider context, setting and extant land use arrangements. To confirm, the site address is to be referenced as **Bridge Park, Brentfield Road, London, NW10 0RH.**

3.1 Wider Site Location

The application site is bounded on its north western edge by the North Circular (A406) beyond which is Wembley Point, a 21-storey residential space with incorporated gym. The north eastern boundary of the site is Brentfield Road, beyond which is predominantly residential in nature. The houses comprise a mixture of semi-detached and terraced properties (and possibly ex local authority housing stock). The south eastern boundary is formed of a small access road, understood to be within the ownership of Network Rail, beyond which is further residential properties which are of more recent construct, comprising of flats and two- three storey houses. The south western edge is banked by railway lines, beyond which is a large Royal Mail distribution centre.

The nearest station is Stonebridge Park which is on the London Overground and Bakerloo lines (Zone 3) and is approximately 238 metres from the site. Further details regarding the site are provided below.

Figure 1 Site Location Plan

3.1.1 Site Description

The Site is centred on Ordnance Survey Grid Reference TQ199841 and occupies approximately 2.7 hectares (ha). This comprises a mixture of hard standing; the former Unisys office buildings; Bridge Park Community Leisure Centre; a number of small industrial and commercial units within Technology House; other outbuildings and temporary structures;

a scrapyard which is landlocked; amenity tree and shrub planting associated with public open space and small areas of rough grassland.

The former Unisys office buildings has been unoccupied for many years and comprises a six-storey office block (southern building), a seven-storey office block (northern building) and a small substation type building. The office buildings are of concrete and brick construction and a number of windows have been broken and or boarded up on both buildings. The broken window has allowed pigeons to gain access which at the last survey were roosting in the top levels of both buildings. The small substation building is of yellow brick construction with a flat roof, metal doors and vents.

The Bridge Park Leisure Centre and Technology House, which houses offices, industrial units, a children's nursery, and a church, are in active use and are comparatively well maintained. Albeit, given the age of these structures, they offer poor quality floor space and are not easily upgraded or converted to an alternate use. The leisure centre footprint comprises a GEA of 2,200m² and overall building 4,400m².

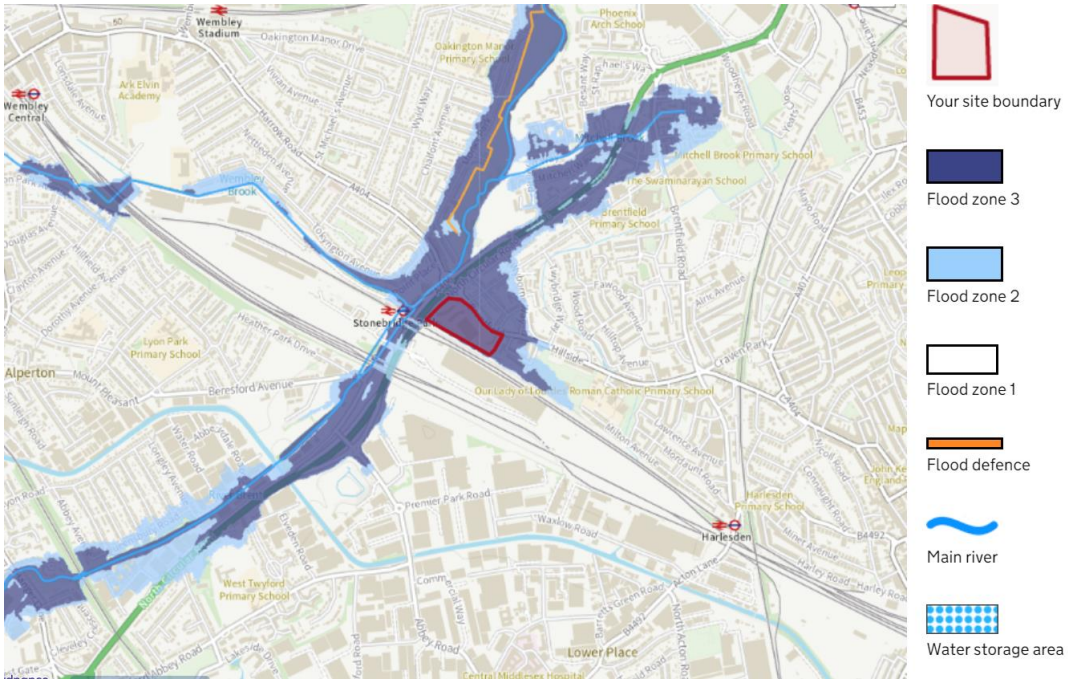
3.1.2 Site Setting

The Site does not contain any Ecological Statutory Site Designations. The line of vegetation between the railway line and the Site is identified as a Site of Importance for Nature Conservation (Borough Importance Grade 1) and a Green Corridor, this area will be retained and strengthened where possible.

Public Transport Accessibility Levels (PTALs) are graded between 0 and 6b, where a score of 0 is very poor access to public transport, and 6b is excellent access. The Site has a PTALs grade of 3, meaning it has good levels of access to public transport.

The extract from the Environment Agency Flood Map for Planning in **Figure 2** shows that the Site is located entirely within Flood Zone 3. This means that the Site has a high probability of flooding (the land has 1% or more chance of flooding from rivers, or a 0.5 or more chance of flooding from the sea).

Figure 2 Extract from Environment Agency Flood Map[1]



3.1.3 Heritage

There are historic records of Stonebridge Bus Depot War Memorial on the Site but this is understood to have been relocated off the Site. Notwithstanding, whilst unlikely, should this memorial be found during the undertaking of any subsequent work, it will be relocated within the public realm. The Unisys Buildings are distinctive and have some significance within the townscape, they are not designated heritage assets.

At present there are no listed buildings or heritage assets on the Site, however there are 3 within 0.5km of the Site:

- Brent Viaduct, Grade II Listed (Entry No. 1078890), approximately 0.27km south of the Site;
- Stonebridge School, including former caretaker's house, playground shelter and cookery and laundry to NW, former manual instruction room and playground shelter to SE and boundary walls, gates, and railings, Grade II Listed (Entry No. 1393460), approximately 0.48km east of the Site;
- Stonebridge Park Public House, Grade II Listed (Entry No. 1078882), approximately 0.5km east of the Site.

Table 1 Planning History

Application Reference	Description	Decision	Determination Date
14/2088	Retrospective application for the temporary change of use to operate a Sunday Market	Refused	13.10.2014

[1] Flood risk information for this location - Flood map for planning - GOV.UK (flood-map-for-planning.service.gov.uk)

Application Reference	Description	Decision	Determination Date
	with approximately 100 stalls and ancillary van parking for an initial period of 12 months		
10/0587	Detail Pursuant to condition 2 (materials - brick sample and colour of doors) for full planning permission 08/3313 dated 6 February 2009 for Erection of single-storey building to house water-transfer station and associated equipment	Permitted	19.03.2010
08/3313	Erection of single-storey building to house water-transfer station and associated equipment	Permitted	06.02.2009
08/1471	Details pursuant to conditions 4 (surface-water drainage) and 9 (flood-risk assessment) of Full Planning Permission reference 02/0945, dated 1 July 2003, for change of use of buildings from offices to hotel, alterations to existing building elevations, erection of 2-storey-high extension to north building for use as conference and leisure facilities, erection of 6-storey link bridge between north and south buildings and erection of 2-level multi-storey car-park structure	Permitted	05.02.2010
08/1519	Details pursuant to condition 2 (detailed elevations and sections of various elements of the extension), 5 (materials) and 10 (detailed plans and sections of link bridge) of full planning permission reference 02/0945, dated 1st July 2003, for change of use of buildings from offices to hotel, alterations to existing building elevations, erection of 2-storey-high extension to north building for use as conference and leisure facilities, erection of 6-storey link bridge between north and south buildings and erection of 2-level multi-storey car-park structure	Permitted	06.06.2008
08/0918	Erection of a single-storey building containing a water-transfer station and an electrical kiosk on land adjacent to Brentfield Road and North Circular Road	Permitted	11.06.2008
07/3786	Erection of a single-storey building containing a water-transfer station and an electrical kiosk on land adjacent to Brentfield Road and North Circular Road	Permitted	26.02.2008
04/0290	Details pursuant to condition 9 (flood risk assessment) of full planning permission reference 02/0945 dated 1st July 2003 for the change of use of buildings from offices to	Withdrawn	24.10.2012

Application Reference	Description	Decision	Determination Date
	hotel, alterations to existing building elevations, erection of 2-storey-high extension to north building for use as conference and leisure facilities, erection of 6-storey link bridge between north and south buildings and erection of 2-level multi-storey car-park structure		
02/2001	Renewal of full planning permission 97/1067 dated 24/09/1997 for conversion to 330-bedroom hotel and erection of single-storey glazed extension linking the 2 existing blocks, new penthouse storey on front block facing North Circular Road, new single-deck car park, new boundary wall, and alteration to existing vehicular access onto Brentfield	Refused	13.11.2003
02/0945	Change of use of buildings from offices to hotel, alterations to existing building elevations, erection of 2-storey-high extension to north building for use as conference and leisure facilities, erection of 6-storey link bridge between north and south buildings and erection of 2-level multi-storey car-park structure.	Permitted	01.07.2003
96/1912	Change of use of existing buildings from offices (Use Class B1) to hotel use (Use Class C1) (as amplified by additional information received 12/02/97).	Permitted	19.03.1997
96/0172	Installation and display of advertisement hoarding	Permitted	05.03.1996
85/0873	Continued use of part site for open market for 100 stalls	Permitted	12.06.1985
85/1502	Use of land for city farm & erection of ancillary buildings	Permitted	21.01.1986
84/1282	Use of part of site as open market	Permitted	19.09.1984

3.2 Policy & Designations

This section gives an overview of the current and emerging policies relevant to the proposed development at the national and local planning levels, which will be reviewed during the EIA process.

3.2.1 The National Planning Policy Framework

The National Planning Policy Framework (NPPF) 2023 sets out the government's planning policies and objectives and how they should be applied.

Section 2 of the NPPF relates to 'achieving sustainable development' stating in paragraph 7 that *"The purpose of the planning system is to contribute to the achievement of sustainable*

development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs."

Paragraph 8 continues by identifying that "*Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant, and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful, and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to protect and enhance our natural, built, and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."

Paragraph 11 relates to considering sustainable development in plans and decision making, placing a clear presumption in favour of sustainable development. "*For decision-taking this means:*

a) approving development proposals that accord with an up-to-date development plan without delay; or

b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

ii) the application of policies in this framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

iii) *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole*".

Section 6 of the NPPF relates to 'building a strong, competitive economy', with paragraph 85 identifying that "*Planning policies and decisions should help create the conditions in which businesses can invest, expand, and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.*"

Section 9 of the NPPF relates to 'promoting sustainable transport'. Paragraph 114 states that in assessing proposals for development for development, "*it should be ensured that:*

a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;

b) *safe and suitable access to the site can be achieved for all users; and*

c) *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."*

Section 11 relates to 'making effective use of land' with Paragraph 123 stating that *"Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions*".

Paragraph 128 states that planning decisions "*should support development that makes efficient use of land, taking into account:*

a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;

b) local market conditions and viability;

c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;

d) *the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*

e) *the importance of securing well-designed, attractive, and healthy places*".

Section 12 relates to 'achieving well-designed places' with Paragraph 131 stating that "*Good design is a key aspect of sustainable development*". Paragraph 135 continues by stating that planning policies and decisions should "*ensure that developments:*

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout, and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming, and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience*".

Paragraph 139 states that "*significant weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings*."

Section 15 relates to 'conserving and enhancing the natural environment'. Paragraph 180 states planning decisions "*should contribute to and enhance the natural and local environment by:*

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

f) *remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate*"

Section 16 relates to 'conserving and enhancing the historic environment'. Paragraph 200 states that in determining proposals for development "*local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting*."

Paragraph 203 states that in planning decisions, "*local planning authorities should take account of:*

a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

c) *the desirability of new development making a positive contribution to local character and distinctiveness."*

3.2.2 The London Plan (2021)

The London Plan is the overall strategic plan for London that sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. The plan forms part of the statutory development plan for London, and its policies inform planning decisions across London.

The following policies are of note with regard to the development proposals:

- Policy GG1 (Building strong and inclusive communities);
- Policy GG2 (Making best use of land);
- Policy GG4 (Delivering the homes Londoners need);
- Policy GG5 (Growing a good economy);
- Policy GG6 (Increasing efficiency and resilience);
- Policy SD6 (Town centres and high streets);

- Policy D2 (Infrastructure requirements for sustainable densities);
- Policy D3 (Optimising Site Capacity through the design led approach);
- Policy D4 (Delivering Good Design);
- Policy D5 (Inclusive Design);
- Policy D6 (Housing quality and standards);
- Policy D7 (Accessible housing);
- Policy D8 (Public Realm);
- Policy D9 (Tall Buildings);
- Policy D11 (Safety, security, and resilience to emergency);
- Policy D12 (Fire Safety);
- Policy H1 (Increasing Housing Supply);
- Policy H4 (Delivering affordable housing);
- Policy H6 (Affordable Housing Tenure);
- Policy HC1 (Heritage conservation and growth);
- Policy G4 (Open Space);
- Policy SI 1 (Improving Air Quality);
- Policy SI 2 (Minimising greenhouse gas emissions);
- Policy T1 (Strategic Approach to Transport);
- Policy T2 (Healthy Streets);
- Policy T3 (Transport Capacity, Connectivity and Safeguarding);
- Policy T6.1 (Residential Parking)

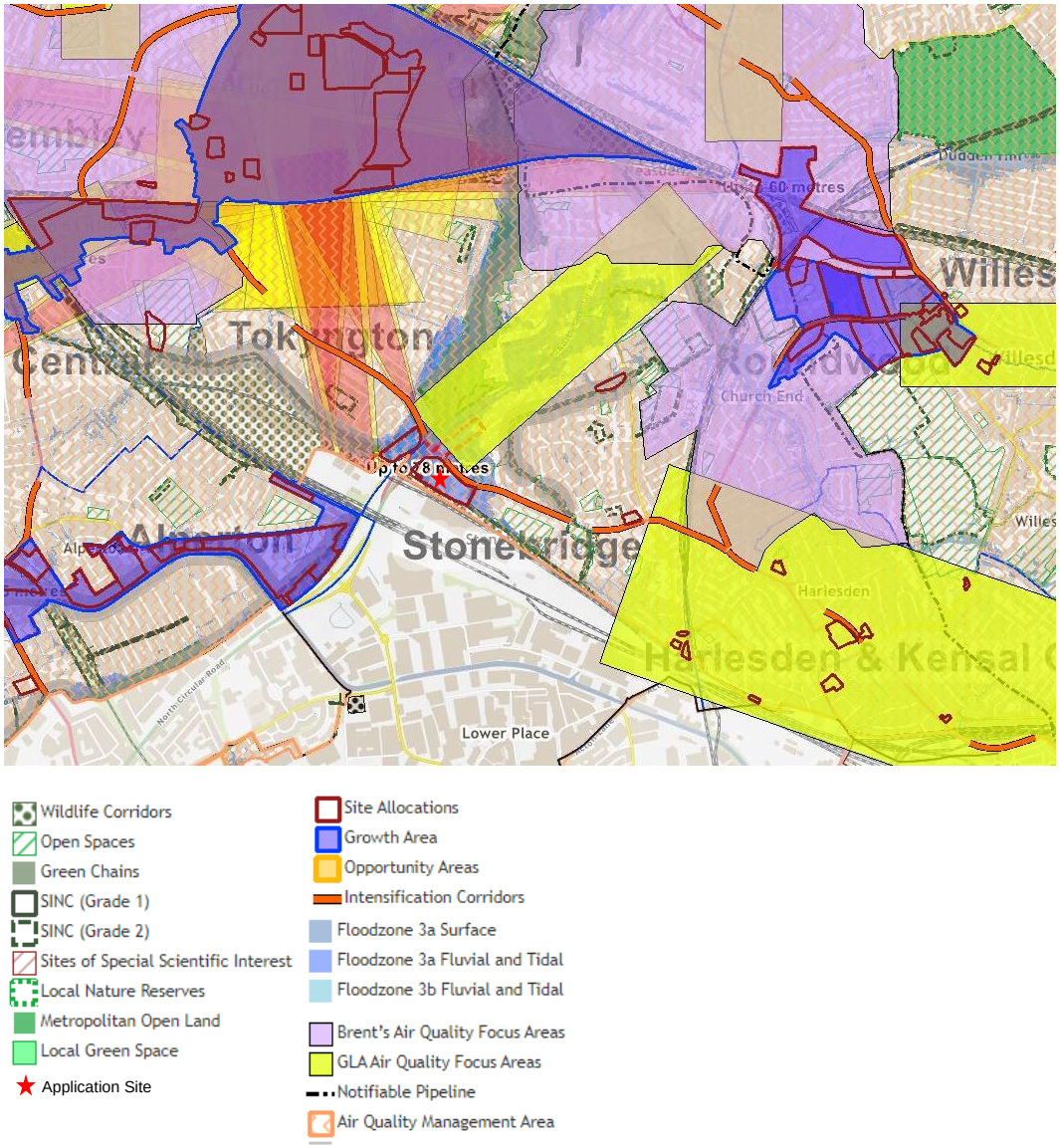
3.2.3 London Borough of Brent Local Plan 2019 – 2041 (adopted 2022)

The London Borough of Brent Local Plan was adopted in 2022 and makes up part of The Development Plan for Brent. This document sets out the vision and policies for the area up until the end of the plan period in 2041. The policies within this document that are considered of relevance to the proposed development include the following:

- Policy DMP1: Development Management General Policy;
- Policy BCGA1: Wembley Growth Area
- Policy BP5: South;
- Policy BSSA7: Bridge Park & Unisys Building (Site Allocation);
- Policy BD1: Leading The Way in Good Urban Design;
- Policy BD2: Tall Buildings;
- Policy BH1: Increasing Housing Supply in Brent;
- Policy BH2: Priority Areas for Additional Housing Provision Within Brent;
- Policy BH5: Affordable Housing;
- Policy BH6: Housing Size Mix;

- Policy BH13: Residential Amenity Space;
- Policy BSI1: Social Infrastructure & Community Facilities;
- Policy BE9: Visitor Accommodation and Attractions;
- Policy BHC1: Brent's Heritage Assets;
- Policy BHC2: National Stadium Wembley;
- Policy BGI1: Green and Blue Infrastructure in Brent;
- Policy BG12: Trees and Woodlands;
- Policy BSUI1: Creating a Resilient and Efficient Brent;
- Policy BSU12: Air Quality;
- Policy BSU13: Managing Flood Risk;
- Policy BSUI4: On Site Water Management and Surface Water Attenuation;
- Policy BT1: Sustainable Travel Choice;
- Policy BT2: Parking and Car Free Development;
- Policy BT3: Freight and Servicing Provision and Protection of Freight Facilities; and
- Policy BT4: Forming an Access on to a Road;

Figure 3 Extract from the Brent Local Plan Policy Mapping[2]



3.2.4 Policy Summary

The proposed development would have to comply with the listed policies on both a national, regional, and local level. A Planning Statement will accompany the planning application and will provide an assessment of the extent to which the proposed development accords with the policies from the National Planning Policy Framework, the London Borough of Brent Local Plan, as well as The London Plan.

[2] https://maps.brent.gov.uk/map/Aurora.svc/run?script=%5CAurora%5CAurora%20-%20Policies%20Map%20May%202022.AuroraScript%24&nocache=82abfa9a-bb82-5340-465a-ebc34efa2490&resize=always&_ga=2.223324699.1020689436.1704364710-1964938894.1703087524

4.0 Description of Development

The following section of this Scoping Request Report seeks to outline the proposed development in more detail. The description of the proposed development is as follows:

"Hybrid planning application for phased mixed-use development for the provision of 13 blocks of 3 to 34 storeys to include up to 872 residential units, assisted living, adult learning facility, affordable workspace, a hotel and community leisure centre comprising:

Full application for the demolition of Bridge Park Community Leisure Centre and Technology House, conversion and upward extension of Unisys Block A to a circa 255 bedrooms hotel and aparthotel (Class C1) with a restaurant on the ground floor, conversion and upward extension of Unisys Block B to circa 110 residential units (Class C3). Construction of a New Community Leisure Centre (Class E(d)) and a block up to 14 storeys to provide assisted living (Class C2), adult learning facility (Class F1a) and affordable workspace (Class E(g)). With associated energy centre (Sui Generis), parking, access, landscaping and amenity spaces.

Outline application for the erection of nine blocks (Blocks C to K) for circa 762 residential units (Class C3), circa 118sqm of flexible retail and café space (Class E), circa 127sqm of community space (Class F2b), basement, associated landscaping and access, amenity space, parking and other associated works, with all matters reserved (except access)."

The detailed design of the development is currently under review as part of the ongoing design process, although the design of the scheme described below is sufficiently developed to allow for the scope of the EIA to be determined.

4.1 Consideration of the Detailed Application

The application would be submitted as a hybrid planning application, with the hotel, block B, the leisure centre and the NAIL being submitted in full detail, as well as the proposed Site access.

4.1.1 Unisys Buildings

The former vacant Unisys office building to the north of the site (Block A) will be converted into a hotel with 255 rooms over 10 storeys, whereas the former vacant Unisys office building to the south of the site (Block B) will be converted into residential and consist of approximately 110 units over 11 storeys. Areas for reception, servicing, bin, and cycle storage, and alike will be provided at ground floor level. These elements are proposed in detail and will comprise part of the full application element of the hybrid planning application submission.

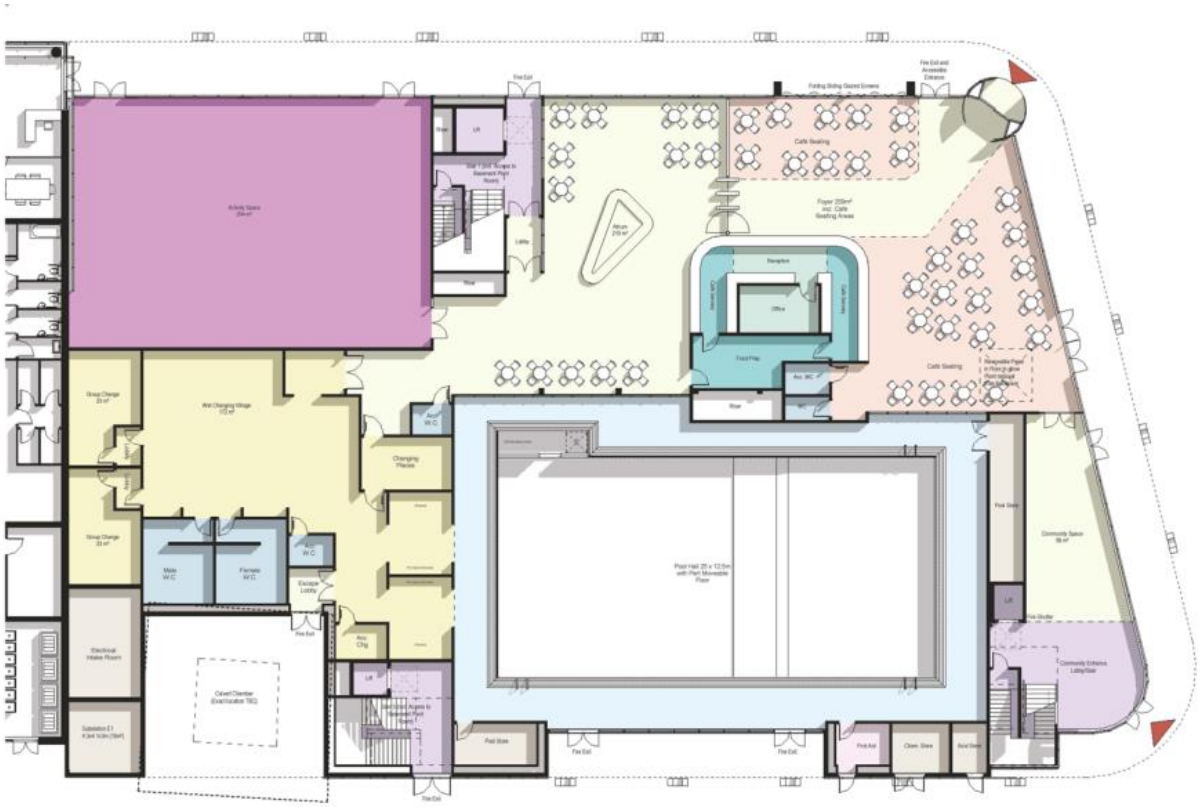
Figure 4 Elevations of the Hotel and Residential Block B

Figure 5 Extract of Proposed Site Layout - Unisys Buildings

4.1.2 Leisure Centre Building

A replacement sports and community centre will be built within the south-eastern most confines of the site, facing onto Brentfield Road at its junction with an adjacent Network Rail access road to the rear of properties facing onto First Drive. The building will incorporate 3 storeys of leisure centre facilities, including swimming pool, sports hall, community space, soft play, fitness gym, spin classroom, multipurpose studios, changing rooms, café and associated administrative and storage spaces.

Figure 6 Leisure Centre Ground Floor



4.1.3 NAIL

A 14-storey tower accommodating 105 units of New Accommodation for Independent Living ('NAIL') will be provided to the rear of the leisure centre building. The NAIL will provide purpose-built homes for people who require support to live independently, including older people and those with a disability. The NAIL will also include adult learning facilities and affordable workspaces.

Again, this element of the scheme is proposed in detail and will comprise part of the full application element of the hybrid planning application submission.

Figure 7 NAIL Ground Floor

Figure 8 NAIL First and Third Floors

4.2 Consideration of Outline

The remit of the Hybrid Planning Application, the elements being dealt with in Outline are obviously subject to some degree of change at Reserved Matters Stage.

The EIA will utilise theoretical maximums for the proposals so that a ‘worst case’ scenario is assessed and to ensure that the EIA is robust. Any subsequent Reserved Matters

application would therefore have to comply with these theoretical maximums, whether they relate to unit numbers, floor space quantum, building heights etc.

The residential blocks C-K are to be submitted as outlined, with details reserved. A total of 9 new residential blocks are proposed on site, based around a central area of open space. These can be roughly split between those fronting onto Brentfield Road (Blocks C-E), within the eastern confines of the site, and those located along the south-western boundary of the site (Blocks F-K).

The residential blocks fronting onto Brentfield Road (Blocks C-E) will consist of the following:

- Block C: 80 units, 14 storeys
- Block D: 64 units, 9 storeys
- Block E: 44 units, 8 storeys

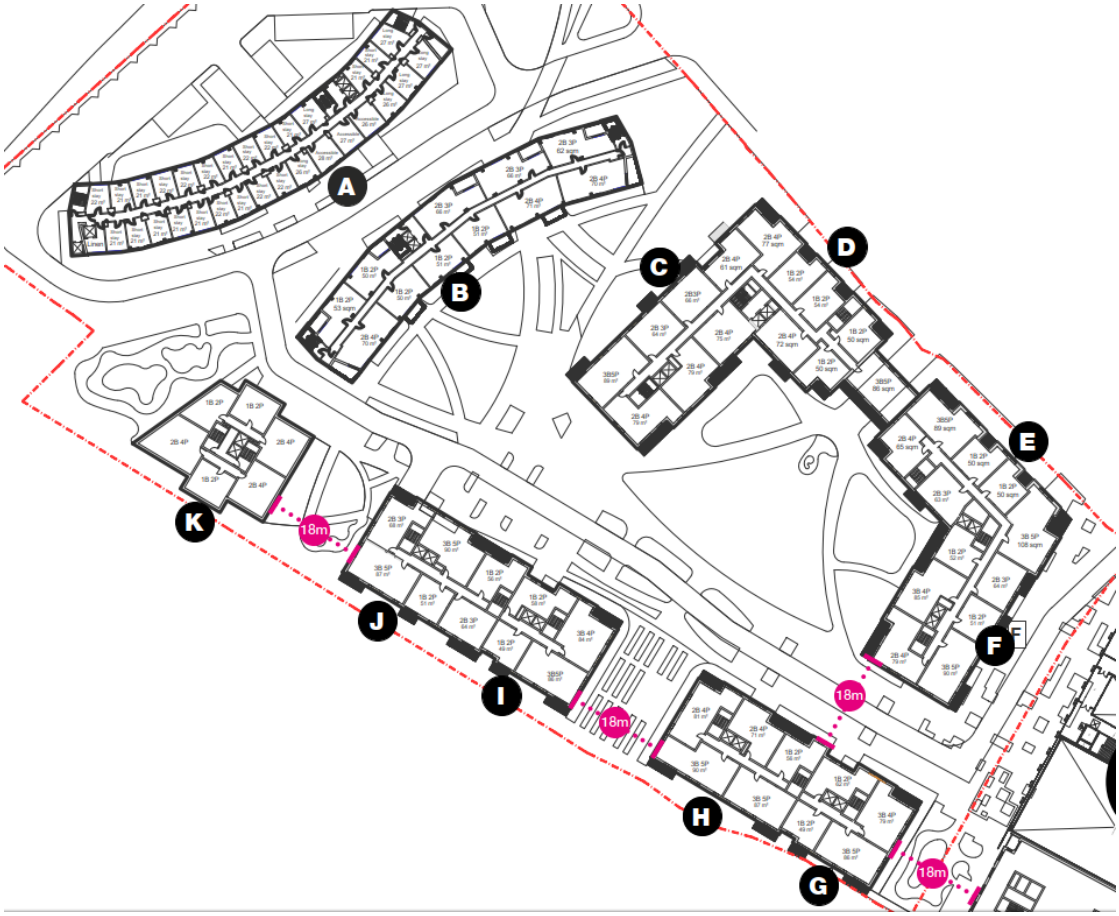
The residential blocks located along the southern boundary of the site (Blocks F-K) will consist of the following:

- Block F: 39 units, 8 storeys
- Block G: 43 units, 11 storeys
- Block H: 102 units, 21 storeys
- Block I: 51 units, 13 storeys
- Block J: 150 units, 26 storeys
- Block K: 189 units, 34 storeys

Within these Block C 127sqm of community space is proposed, with 118sqm of retail space proposed within Block E.

These elements will be proposed in outline, with the matters of appearance, means of access, landscaping, layout, and scale reserved for subsequent consent.

Figure 9 Ground Floor- Residential



4.3 Landscaping

The proposed landscaping seeks the creation of a high-quality public realm, fostering a community where residents can not only reside but also engage socially. The spaces are designed with clarity and accessibility in mind, ensuring inclusivity for all, informal and natural play spaces, green pedestrian links and careful consideration of SuDS and biodiversity. Communal roof gardens would provide useable outdoor amenity space for seating and additional play that encourages social cohesion. Opportunities for play have been considered across the whole Site, providing doorstep or incidental play elements that are accessible and multi-functional for various ages and abilities. Hard and soft materials will reflect the historical and ecological context of the Site, respecting its former use as a transport hub. The planting design proposed to incorporate native and flowering planting species SuDS and green/brown roofs, which is important in delivering the Urban Greening Factor (UGF) and Biodiversity Net Gain (BNG). The Landscape Master Plan is shown in **Figure 10** below.

Figure 10 Landscape Masterplan

4.4 Parking & Servicing

As outlined within the indicative application drawings, the development will be based around a central area of landscaped open space, which will also function as flood compensation storage when necessary. Details of landscaping will be a matter reserved for subsequent consent.

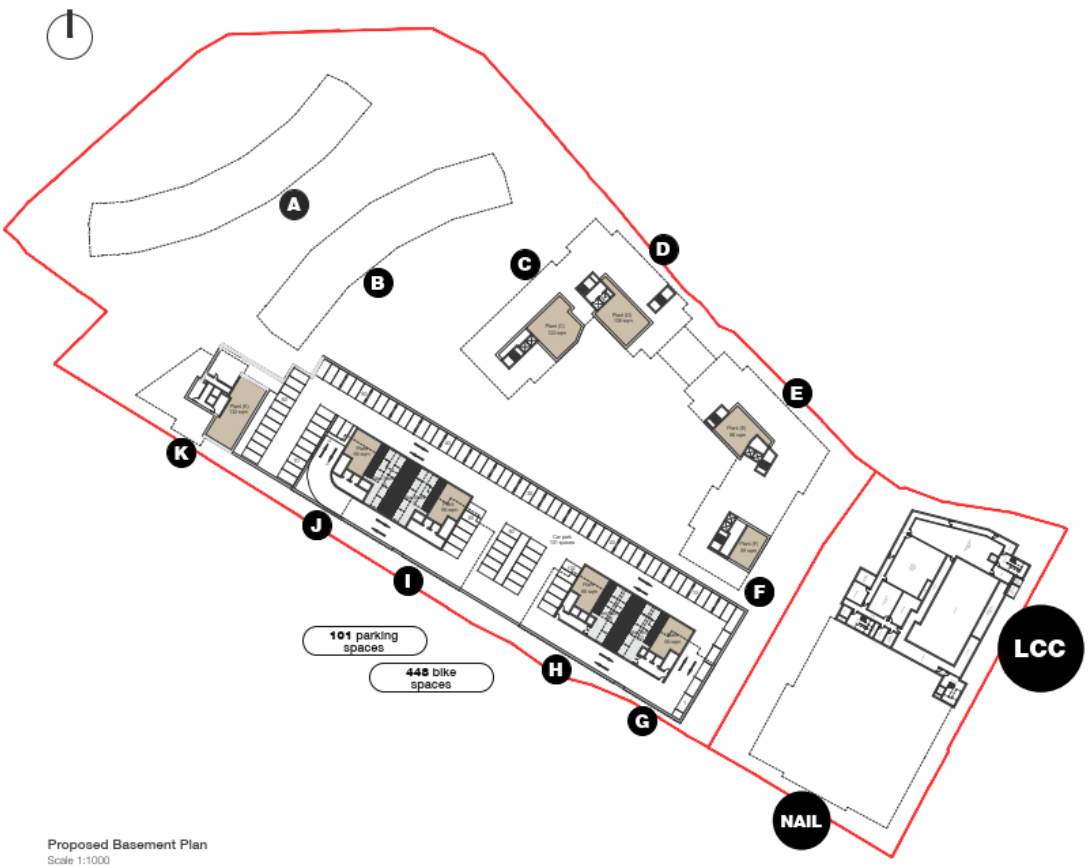
Internal bike and refuse storage would be provided within the residential and hotel elements of the proposal. Final details of these storage areas will be confirmed by a reserved matters consent. There will be suitable refuse and bike storage for the NAIL and Leisure Centre, these will be confirmed within the planning application.

In terms of parking, the proposal favours surface and basement car parking blended with landscaping and planting along the internal streets. The Leisure Centre and Nail elements are proposed to be car free save for accessible parking, drop off and operational requirements.

The parking on site will comprise the following:

- Hotel: 62 car parking spaces, 12 disabled bays and 3 servicing / coach bays; and
- Residential, Leisure Centre and NAIL: 102 parking spaces (Residential only), 10 disabled bays and 5 servicing bays

Figure 11 Proposed Residential Car Parking Arrangement



4.5 Infrastructure & Sustainability

There is an underground pipeline (Thames Water easement) that bisects the site between the Unisys buildings which creates an approximate 18m wide 'no-build' zone, this has been considered in the design and technical stages of the Project. There are three substations highlighted on the northern part of the Site. The proposal seeks the addition of a new substation within Block A. The residential and hotel elements of the Site will not be connected to the gas mains supply and will run completely on electricity supply.

It is the applicant's intention that the development will;

1) Be designed and constructed to meet the London Plan 2021 targets, through a combination of energy conservation measures, low carbon technologies, and exploring renewable technologies considering the site particulars.
2) Following the Mayors energy hierarchy:
   i) Be Lean – Enhancements to the building fabric.
   ii) Be Clean - Enhancements to low energy technologies
   iii) Be Green – Renewable energy.
3) Comply with Brent Local Plan sustainability aim and objectives.
4) Provide a minimum of 35% carbon reduction over building regulation and consideration.
5) Provide non-residential spaces to achieve BREEAM "Excellent" standards.

The adaptive reuse of the two Unisys buildings contribute positively to the master plan's embodied carbon credentials. The concrete structure of these buildings will be reused and

paired with new thermally efficient façade systems. All blocks are expected to connect into a site heating network, with a single Energy Centre. Solar PV will be included, with the applicant working towards an installation of ~150kWp. Heat Pumps would be included, including approximately 80% of the Site heating load, generating ~4,800 MWh/yr.

4.6 Indicative Phasing of the Development

The proposed development is envisaged to follow the phasing below (this could be subject to change, and is only indicative at this stage):

- PHASE 1: Former Unisys buildings to be converted to Hotel and Residential, demolition of existing Scrap Yard and Technology House Bridge Park Sport, Community Centre replacement and NAIL constructed
- PHASE 2: Residential Building
- PHASE 3: Demolition of existing Leisure Centre
- PHASE 4: Residential Building
- PHASE 5: Residential Tower

Figure 12 Indicative Phasing Plan

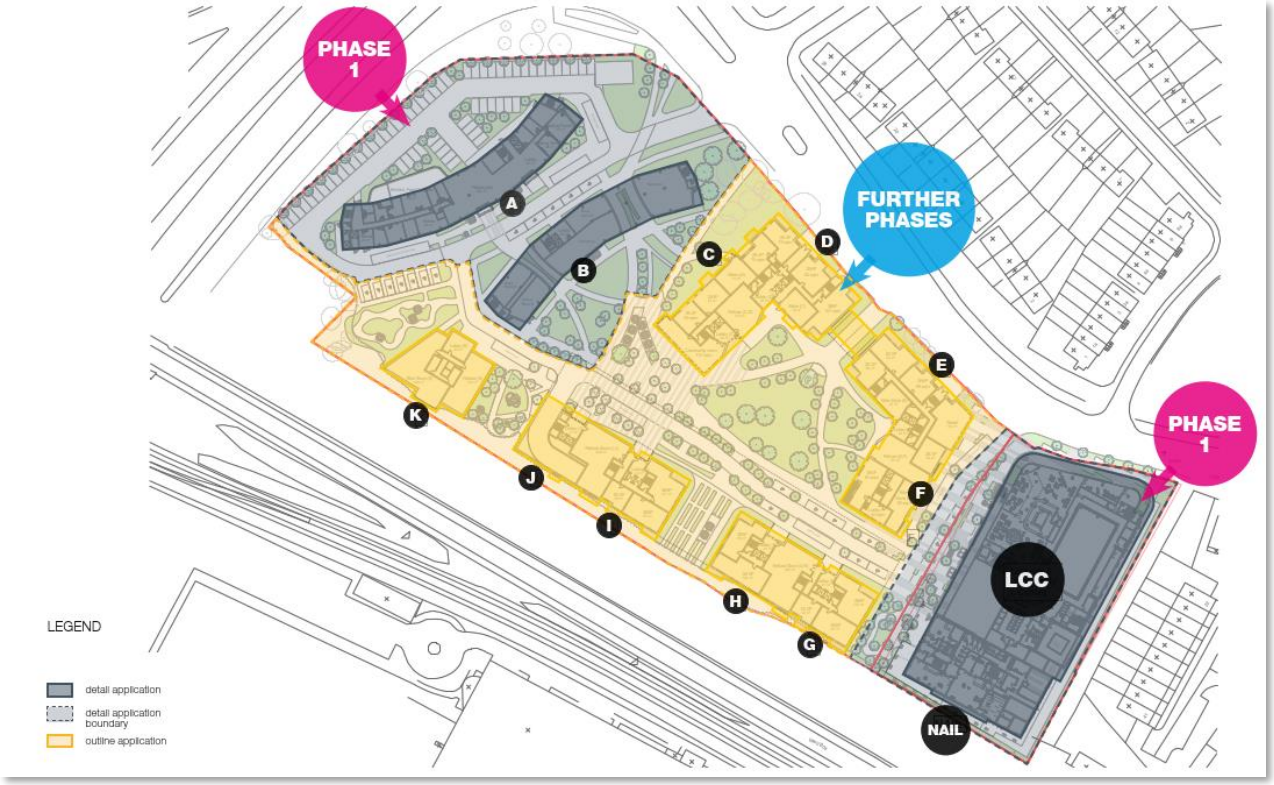


Table 2 Summary of Development[3]

Block	Block	Storeys	Type of Development	Residential Units / Rooms	Leisure & community / Retail Floorspace (GIA)	Permission Sought
Unisys Building (North)	A	10	Hotel	255 rooms		Full
Unisys Building (South)	B	11	Residential	110 units		Full
Residential	C	14	Residential	80 units	127sqm Community	Outline
	D	9	Residential	64 units		Outline
	E	8	Residential	44 units	118sqm Retail	Outline
Rear Residential	F	8	Residential	39 units		Outline
	G	11	Residential	43 units		Outline
	H	21	Residential	102 units		Outline
	I	13	Residential	150 units		Outline
	J	26	Residential	101 units		Outline
	K	34	Residential	189 units		Outline
Leisure Centre	N/A	3	Leisure, community & retail	x	4,899 sq m of leisure (including café) plus community centre 839 sq m	Full
NAIL	N/A	14	Residential (New Accommodation Independent Living / Assisted Living), Affordable Workspace, and Adult Learning	105 units		Full

[3] This figures could be subject to change, however, these are the likely maximum quantum of development.

5.0 Approach to the Environmental Statement

The following sections of the Scoping Request Report deal specifically with EIA Scoping considerations. This section includes consideration of the approach to an EIA, including;

- Methodology
- Structure and Format of ES
- The Team
- Associated Application Submission
- Considerations of Alternatives; and
- Committed Developments

Further detail regarding the topics which would be 'Scoped In' and those topics proposed to be 'Scoped Out' of any ES are detailed in Sections 6 and 7 of this report respectively.

5.1 Methodology

The EIA will be prepared in accordance with the requirements of the Regulations and with reference to best practice guidance, including that published by the Institute of Environmental Management and Assessment ('IEMA'). All information required or reasonably required to identify the significant environmental effects of the development, as defined by Schedule 4 of the Regulations, will be provided as part of the ES.

The assessment will also include consideration of relevant policy and legislation of relevance whilst also considering comments received through both the scoping exercise and any pre-application consultation undertaken.

Each technical assessment will follow a consistent approach and format, which will include the following details:

- Review of relevant policy, legislation, and guidance;
- A detailed topic specific assessment methodology, consultation undertaken, and confirmation of how the assessment relates to the standardised significance criteria adopted for the EIA;
- Consideration of baseline conditions, including identification of sources of information, site history, current environmental conditions and future trends/anticipated changes to current conditions that could be anticipated without the scheme (i.e. the 'future baseline');
- Identification of the potential effects, including a summary of those resources/receptors likely to be affected, the sensitivity of those receptors to accommodate change; the magnitude (degree) of change resulting from the proposal; the change of events or pathways linking cause to effect and a prediction in the significance of effects in terms of nature, extent and magnitude including whether it is direct/indirect, short/long term, temporary/permanent, and adverse/neutral/beneficial in nature;
- The scope for incorporating mitigation measures to avoid, reduce, remedy, or compensate for any identified effects and the need for any monitoring measures; and
- Identification of any effects remaining after mitigation (the 'residual effects').

Where appropriate, the technical assessments will also identify areas of technical deficiency and/or knowledge, such as a lack of baseline evidence or inconsistency in results from any

monitoring, modelling or alike. In such circumstances, a 'worst case' assessment approach would be undertaken unless otherwise justified.

The effects of individual environmental matters will be transcribed, where appropriate, against a common list of significance criteria for the EIA. However, the use of the common list of significance criteria will be dependent upon any specific legislative and assessment guidance requirements for each topic (i.e. ECIA or GLVIA3). At this stage, it is proposed that the common list of significance criteria will comprise:

- Substantial / Major beneficial;
- Moderate beneficial;
- Minor beneficial;
- Neutral/ Negligible;
- Minor adverse;
- Moderate adverse; and
- Substantial / Major adverse

Where necessary, it will be clarified where the sensitivity, magnitude of change and subsequent significance criteria are based on fact, technically robust assumptions or professional judgement. This is generally reliant upon the technical assessment, the methodology employed and the level of evidence available at the time of the assessment. An appropriate list of reference material will be provided at the end of each technical assessment chapter.

The technical assessments will include consideration of both construction and operational phase effects, including any overlap of development phases; i.e. occupation of part of the development whilst construction activities are ongoing within a later phase.

As detailed below, Chapter 2 of the proposed ES would outline the EIA Process and Methodology in more detail. This will include detailed information on the methodology and approach adopted for the undertaking of the cumulative and in-combination assessment, identification of committed developments, zone of influence for each technical chapter and where any professional judgement has been appropriately utilised.

5.2 Structure & Format of ES

The findings of the EIA will be set out in the ES which will comprise three volumes, as follows:

- Volume 1 – Main Report containing the individual ES Chapters, including:
    - Chapter 1 – Introduction
    - Chapter 2 – EIA Process and Methodology
    - Chapter 3 – Description of Site and Surroundings
    - Chapter 4 – Description of the Proposed Development
    - Chapter 5 – Consideration of Alternatives
    - Chapter 6 – Scoping and Consultation
    - Chapter 7 – Planning Policy Context
    - Chapter 8 – Description of Committed Developments
    - Chapter 9 – Ground Conditions & Contamination
    - Chapter 10 – Ecology & Biodiversity

  - Chapter 11 – Townscape & Visual
  - Chapter 12 – Traffic & Transport
  - Chapter 13 – Noise & Vibration
  - Chapter 14 – Air Quality
  - Chapter 15 – Daylight, Sunlight and Overshadowing
  - Chapter 16 – Wind Engineering
  - Chapter 17 – Utilities
  - Chapter 18 – Socio-Economics
  - Chapter 19 – Other Environmental Issues
  - Chapter 20 – Assessment of Cumulative Effects
  - Chapter 21 – Summary of Mitigation and Monitoring
  - Chapter 22 – Summary of Residual Effects and Conclusion
- Volume 2 – Technical Appendices; and
- Volume 3 – Non-Technical Summary.

A glossary and list of acronyms and abbreviations used within the EIA will be provided within Volume 2 (Technical Appendices).

5.3 The Team

The 2017 EIA Regulations requires that the EIA be prepared by 'competent experts' (i.e., those with sufficient expertise) to ensure the completeness and quality of the statement (Regulation 18 (5) (a)). It is confirmed that the team proposed to be involved in the EIA have the relevant experience and competency to carry out the technical assessment work. The ES will include a statement on confirming how the requirements of the Regulations have been met.

SLR is a registered Environmental Impact Assessor Member of the Institute of Environmental Management and Assessment (IEMA), benefiting from the IEMA EIA Quality Mark, whilst the following consultant team will be responsible for the preparation of the technical assessments and, if appropriate, the chapters of the ES itself:

Table 3 Technical Assessments and Deliverables

Deliverable	Consultant
Design Code	Studio Moren
Design and Access Statement	Studio Moren, Ridge and Partners and Robert Limbrick
Landscaping and Public Realm Statement	MacFarlane Associates
Urban Greening Factor	MacFarlane Associates
Preliminary Ecological Assessment	SLR
Protected Species Survey	SLR
Archaeology Impact Assessment	SLR
Heritage Assessment	SLR

Deliverable	Consultant
Biodiversity Net Gain Assessment	SLR
Geo-Environmental & Geotechnical Preliminary Risk Assessment	Buro Happold and Ridge and Partners
Flood Risk Assessment	Pell Fischmann
Drainage Strategy	Pell Fischmann
Energy Statement	Hodkinson and Ridge and Partners
Sustainability Statement	Hodkinson and Ridge and Partners
BREEAM Pre-Assessment	Hodkinson and Ridge and Partners
Overheating Assessment	Hodkinson and Ridge and Partners
Whole Life Carbon Assessment	Hodkinson and Ridge and Partners
Circular Economy Statement	Hodkinson and Ridge and Partners
Transport Assessment	RGP and Ridge and Partners
Travel Plan	RGP and Ridge and Partners
Delivery & Servicing Plan	RGP and Ridge and Partners
Site Waste Management Plan	RGP and Ridge and Partners
Construction Management Plan	RGP and Ridge and Partners
Planning Statement	RPS
Ventilation/ Extraction Statement	Buro Happold and Ridge and Partners
Viability/ Affordable Housing Statement	BNP Paribas and Deloitte
Fire Safety Statement for Planning	Buro Happold and Ridge and Partners
Utilities Assessment	Buro Happold and Ridge and Partners
TVIA	Turley
Sunlight, Daylight and Overshadowing	GIA

5.4 Associated Application Submission

The planning application submission will be supporting by a range of information and technical assessments which will include a Planning Statement, Design and Access Statement, Statement of Community Involvement and other technical reports as required which will consider the comments and advice received from the BC during the pre-application process.

5.5 Consideration of Alternatives

Schedule 4 of the Regulations requires a description of the ‘reasonable alternatives’ for the development which have been studied by the developer and the main reasons for selecting the chosen option, including a comparison of the environmental effects.

The EIA will include a review of:

- The likely effects in the event that the development does not come forward ('the no development scenario'); and
- Details of alternatives considered regarding location and the design of the development itself.

The consultant team has been involved in the process of design iteration and emergence of the development proposals. This process will be documented as part of the EIA. It is not necessary to provide consideration of theoretical alternatives (i.e., alternatives not considered through the design process).

5.6 Committed Developments & Cumulative Effects

In accordance with the Regulations, the EIA will include an assessment of any direct and indirect cumulative effects arising from the development when considered alongside any other developments in the area surrounding the site. The objective is to identify any combined effects from the development of effects from several developments; and if, whilst individually the effects may insignificant could when considered together cause a further significant or indirect impact requiring mitigation.

In relation to other development, best practice dictates that cumulative assessments of this nature should have regard to those schemes which are 'reasonably foreseeable' (i.e. usually those under construction, with an extant planning permission or are subject of a suitable development plan allocation). The assessment is only capable of being carried out based on the information available at the time of assessment.

The assessment should focus only where there is the potential for significant cumulative effects and, for this development, an initial review of potential developments requiring review has therefore focussed on those developments which due to their proximity or scale are most likely to give rise to cumulative effects. Consideration has been given to the areas within which cumulative effects are most likely.

Notwithstanding, a suitable Zone of Influence (ZOI) will be established by each technical assessment within their associated topic chapter within the ES. An overview of the ZOI's established by each topic will be contained within the Methodology Chapter of the ES, whilst a map will be provided within Volume 2 (Technical Appendices) of the EIA.

5.6.1 Committed Developments

Reasonably foreseeable significant developments and local plan site allocations relevant to the site and that would be considered in the cumulative assessment for the proposed development have been listed in **Table 4** below:

Table 4 Committed Developments

App Ref.	Description	Status
23/2805	*Demolition of Youth Centre and the construction of a new Special Educational Needs School comprising a three-storey school building, MUGA, soft and hard landscaping, access, parking and drop off and pick up system.* *Wembley Youth Centre and Land next to Ex Dennis Jackson Centre, London Road, Wembley, HA9*	Permission Granted (14 Dec 2023)
20/0115	*Demolition of existing building; erection of 3 buildings ranging from 2 to 9 storeys with basement comprising 238 self contained flats with commercial space at basement and ground floor levels (Use Class B1); creation of new street,*	Permission Granted (06 Dec 2023)

App Ref.	Description	Status
	associated landscaping, car and cycle parking, private and communal amenity space. *Matalan Discount Club, Cricklewood Broadway, London, NW2 6PH*	
23/3372	*Demolition of existing building and redevelopment to create a new self-storage facility (Use Class B8) with associated access, parking, landscaping and other associated works.* *R & S Greeting Cards, Fourth Way, Wembley, HA9 0LH*	Awaiting Decision (Validated 23 Oct 2023)
23/3250	*Demolition of existing hotel building and community centre and erection of a part 6, part 8 and part 10 storey 318 room aparthotel plus basement accommodation with associated ancillary facilities, community floorspace (Use Class F1/F2), servicing, landscaping and cycle and refuse storage (phased development).* *1-11 Elm Road and 10-12 St Johns Road, Wembley, HA9*	Awaiting Decision (Validated 10 Oct 2023)
23/1643	*Demolition of existing buildings and erection of industrial building (Use Class B8) comprising servicing area, cycle parking, roof plant and associated infrastructure and related works.* *Southway Garages, South Way, Wembley, HA9 0HE*	Permission Granted (04 Oct 2023)
23/2910	*Demolition of existing building and erection of a 10 storey mixed used building with lower ground floor and plant basement level comprising commercial kitchens (Use Class E (g(iii)), ground floor market hall (Use Class E) with associated amenity, servicing, delivery, parking and landscaping.* *Dephna House, 119 Neasden Lane, London, NW10 1PH*	Awaiting Decision (Validated 04 Sept 2023)
22/2225	*Demolition of existing buildings and construction of an up to part 13 and part 17 storeys (including ground level) building comprising purpose-built student bed spaces (Use Class Sui Generis) together with ancillary communal facilities, flexible non-residential floor space (Use Class E), cycle parking, mechanical plant, landscaping together with other associated works, subject to Deed of Agreement dated 3rd May 2023 under Section 106 of Town and Country Planning Act, 1990, as amended.* *Fairgate House, 390-400 and 402-408 (Even), High Road, Wembley, HA9*	Permission Granted (03 May 2023)
22/2225	*Demolition of existing buildings and construction of an up to part 13 and part 17 storeys (including ground level) building comprising purpose-built student bed spaces (Use Class Sui Generis) together with ancillary communal facilities, flexible non-residential floor space (Use Class E), cycle parking, mechanical plant, landscaping together with other associated works, subject to Deed of Agreement dated 3rd May 2023 under Section 106 of Town and Country Planning Act, 1990, as amended.*	Permission Granted (03 May 2023)

App Ref.	Description	Status
	Fairgate House, 390-400 and 402-408 (Even), High Road, Wembley, HA9	
23/1426	*Demolition of existing buildings and structures and erection of buildings ranging in height from 5 to 15 storeys to provide student accommodation (Use Class Sui Generis), light industrial (Use Class E(g)(iii) and cafe (Use Class E(a)), car and cycle parking, amenity space, landscaping and associated works.* *Glynns Skip Hire, Fifth Way, Wembley, HA9 0JD*	Awaiting Decision (Validated 21 April 2023)
18/4767	*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.* *Access Storage, First Way, Wembley, HA9 0JD*	Permission Granted (30 March 2023) One discharge of condition application granted in Dec 2023.
22/4290	*Reserved matters application in relation to hybrid planning permissions 22/2886 dated 06/12/2022 and 20/2844 dated 30/03/2021 for the landscaping for Plot NE04 and Plot NE05 Enabling Works comprising of demolition of existing structures; the removal of the existing hard standing; below ground operational works comprising the installation of the foul water and surface water network; the installation of the attenuation tanks; the installation of the district heat network; and the installation of utilities required to ready the site for the future construction of Plots NE04 and NE05 and to allow for future connection to Plots NE01, NE02, NE03 and NE06.* *Information is provided to discharge the following conditions for the Plot NE04 and Plot NE05 Enabling Works:* *1: Landscaping* *19(i): Site Wide Heat Network* *19(j): Location of Services* *27: Construction Logistics Plan* *37: Construction Method Statement* *42: Site Investigation and Remediation Strategy* *45: Drainage* *47: Surface Water Drainage Strategy* *49: Phasing Plan* *Land to the west of Fulton Road and the north of First Way and Engineers Way (Plots NE04 and NE05 of the north east lands), Wembley, HA9.*	Permission Granted (13 Mar 2023)

App Ref.	Description	Status
23/0580	*Redevelopment of existing open space comprising the construction of 195 dwellings (Use Class C3) to be provided in four residential apartment blocks (of up to 10 storeys) and new part 2 and 3 storey terraced housing and c.133sqm community space (block A) (use Class E and Class F2 (a-c)), a new vehicular access/service road; new communal open spaces and growing space; landscape, public realm, drainage, flood attenuation and ecological enhancements, including Brent River Park improvements; provision of new and replacement of existing children's/ young person's play, replacement skate park, new outdoor gym; new and enhanced pedestrian and cycle access; lighting; associated blue badge and cycle parking, demolition of existing and replacement refuse stores, loading bays, parcel locker and all other associated infrastructure works (DEPARTURE FROM POLICY G4 OF THE LONDON PLAN (2021)).* *Brent River Park and Land next to Tillett Close Pitfield Way Overton Close, Tillett Close, St Raphael's Estate, London, NW10*	Awaiting Decision (Validated 21 Feb 2023)
23/0578	*Demolition of existing building and erection of building for use as a purpose-built Further Education College Campus of up to 8 storeys high with associated plant at roof level, provision of hard and soft landscaping and cycle parking facilities, loading bay and accessible parking bays on Rutherford Road frontage and drop off bay on Fulton Road.* *Olympic Office Centre, 8 Fulton Road, Wembley, HA9 0NU*	Awaiting Decision (Validated 16 Feb 2023)
23/0176	*Partial demolition of the HNS Autos building and other associated buildings on site and erection of new building of part 2, part 4 and part 8 storeys comprising 32 residential units at 1st to 7th floors and commercial space to accommodate commercial use (Use Class E(g)) at ground floor level, cycle parking spaces, blue badge parking, amenity space and landscaping.* *All Units at Dowlings Parade, HNS Autos and Delta Hand Car Wash, Bridgewater Road, Wembley, HA0 1AJ*	Awaiting Decision (Validated 18 Jan 2023)
22/3965	*Demolition of existing buildings and construction of two new buildings to provide commercial floorspace (Use Class: E) and student accommodation bedspaces (Use Class: Sui Generis), associated access and highways works, amenity space, cycle parking spaces, disabled car parking spaces and refuse/recycling stores.* *1-4 and 9 Watkin Road, Wembley, HA9 0NL*	Awaiting Decision (Validated 18 Nov 2022)
22/3346	*Demolition of existing buildings and erection of a six and part seven storey building with basement level comprising 41 residential flats (Use Class C3), ground floor commercial unit (Use Class E), associated communal space, landscaping and cycle and refuse storage.*	Awaiting Decision (Validated 28 Sept 2022)

App Ref.	Description	Status
	1-8 Sevenex Parade & 2A London Road, Wembley, HA9	
22/2477	*Redevelopment of site to provide two new 10 storey buildings to accommodate 88 flats, use of ground floor as Drinking Establishment (Use Class: Sui Generis) and/or Community Use (Use Class: F2) with additional affordable workspace (Use Class: E) at ground floor level, associated vehicular crossover, car and cycle parking spaces, refuse storage, amenity spaces, landscaping and associated works.* *245-249 and 253 Ealing Road, Wembley, HA0 1EX*	Awaiting Decision (Validated 12 July 2022)
20/2033	*Demolition and redevelopment to provide new buildings ranging between 11 and 21 storeys with basement levels; all for a mix of uses comprising 493 residential units, retail (Use Class A1) and industrial floorspace (Use Class B1(c); provision of private and communal space, car parking, cycle parking, ancillary space, mechanical plant, landscaping and other associated works. Application is accompanied by an environmental statement.* *Euro House, Fulton Road, Wembley, HA9 0TF*	Permission Granted (22 March 2022)
22/0784	*Redevelopment of site including the erection of 3no. buildings up to 32 storeys in height, comprising 515 residential dwellings (Use Class C3), flexible commercial floor space (Use Class E), indoor sports facility (Use Class E) and associated parking, landscaping, and enabling works APPLICATION SUBJECT TO AN ENVIRONMENTAL STATEMENT* *Wembley Point, Wem Tower, 1 Harrow Road and 5-15 Harrow Road, Wembley, HA9*	Awaiting decision (Submitted 01 Mar 2022)
22/0784	*Redevelopment of site including the erection of 3no. buildings up to 32 storeys in height, comprising 515 residential dwellings (Use Class C3), flexible commercial floor space (Use Class E), indoor sports facility (Use Class E) and associated parking, landscaping and enabling works APPLICATION SUBJECT TO AN ENVIRONMENTAL STATEMENT.* *Wembley Point*	Awaiting Decision (Validation 01 March 2022)
20/0967	*Comprehensive mixed-use redevelopment of the site comprising the phased demolition of the existing buildings and structures on site and the phased development comprising site preparation works, provision of five new buildings containing residential uses, replacement train crew accommodation and flexible retail floorspace, basement, private and communal amenity space, associated car parking (including the part re-provision of station car parking), cycle parking, refuse storage, plant and other associated works.* *Wembley Park Station Car Park and Train Crew Centre, Brook Avenue, Wembley, HA*	Permission Granted (22 Feb 2022) Five discharge of condition applications approved, with the latest in Apr 2022.

App Ref.	Description	Status
20/3156	*Demolition of the existing buildings and the erection of a mixed use development of buildings ranging between 3 and 16 storeys in height, comprising residential units, flexible commercial floorspace, affordable workspaces and community use floorspace, associated car parking, landscaping and ancillary facilities (phased development)* *1-26A, coachworks & storage areas, Abbey Manufacturing Estate, all units Edwards Yard, Mount Pleasant, Wembley, HA0*	Permission Granted (21 Jan 2022)
21/4155	*Demolition of existing building and proposed erection of a part 5 and part 18 storey mixed use building containing commercial floorspace (Use Class E) on the ground floor and comprising 79 residential units on the upper floors.* *6 St Johns Road, Wembley, HA9 7JD*	Awaiting Decision (Validated 08 Nov 2021)
20/3914	*Demolition of the existing buildings and structures, the erection of a building ranging in height up to 28 storeys, incorporating 461 residential units and industrial, community and commercial uses, together with associated landscaping, access arrangements, car and cycle parking, servicing and refuse and recycling (Amended Description 09.03.21).* *330 Ealing Road, Wembley, HA0 4LL*	Permission Granted (29 Oct 2021) Eleven discharge of condition applications have been submitted, with the most recent validated in Nov 2023. Two NMA applications have been granted in 2023.
21/3941	*Demolition of the existing buildings and structures, the erection of a 'co-location' scheme ranging in height from 2 to 19 storeys, incorporating industrial floorspace with residential accommodation (Use Class C3), together with associated landscaping, access arrangements, car and cycle parking, servicing and refuse and recycling facilities.* *Part of Westend Saab, 2A Bridgewater Road and Boyriven Textile, Bridgewater Road, Wembley, HA0 1AJ*	Awaiting Decision (Validated 18 Oct 2021)
20/2784	*Hybrid planning application comprising:-* *Outline planning permission for the demolition of existing buildings and structures on the site, all site preparation works and redevelopment to provide new buildings to accommodate new homes (Use Class C3), flexible commercial uses, new basement level, associated cycle and vehicle parking, new vehicular accesses, associated highway works to Beresford Avenue, landscaping and creation of new public and private open space, ancillary facilitating works, various temporary*	Permission Granted (15 June 2021) Nine discharge of conditions applications have been

App Ref.	Description	Status
	meanwhile uses, interim works and infrastructure with all matters reserved - appearance, access, landscaping, layout and scale. *Detailed planning permission for Phase 3 (Buildings G, H and J) for the demolition of existing buildings and structures, all site preparation and infrastructure works and the development of new homes (Use Class C3) and flexible commercial floorspace; together with new basement level, associated storage, cycle and vehicle parking, new vehicular accesses, associated highway works to Beresford Avenue, landscaping and creation of new public and private open space, ancillary facilitating works.* *Land Former 17 Northfields, Beresford Avenue, Wembley, HA0 1NW*	granted, with the latest in Nov 2023.Two NMA application were granted in Sep and Dec 2023.
21/2130	*Demolition of existing building at 3 Olympic Way and erection of 3 buildings of basement, ground and 9, 22 and 25 storeys (excluding rooftop plant) to provide 172 residential units (Use Class C3), new hotel accommodation comprising 260 rooms (Use Class C1) and retail food stores (Use Class E). 6-storey extension to existing hotel at 5 Olympic Way to provide 95 additional hotel rooms (Use Class C1) and amenities, extension of ground floor to create new colonnade and public realm improvements to Olympic Way. Other works associated with development include new access from North End Road, disabled car parking, cycle parking, private and communal amenity spaces, public realm works and other associated works.* *Olympic House, 3 and Novotel, 5 Olympic Way, Wembley, HA9.*	Awaiting decision (Submitted 04 Jun 2021)
21/2130	*Demolition of existing building at 3 Olympic Way and erection of 3 buildings of basement, ground and 9, 22 and 25 storeys (excluding rooftop plant) to provide 172 residential units (Use Class C3), new hotel accommodation comprising 260 rooms (Use Class C1) and retail food stores (Use Class E). 6-storey extension to existing hotel at 5 Olympic Way to provide 95 additional hotel rooms (Use Class C1) and amenities, extension of ground floor to create new colonnade and public realm improvements to Olympic Way. Other works associated with development include new access from North End Road, disabled car parking, cycle parking, private and communal amenity spaces, public realm works and other associated works.* *Olympic House, 3 and Novotel, 5 Olympic Way, Wembley, HA9*	Awaiting Decision (Validated 04 June 2021)
20/1424	*Demolition of existing commercial building and erection of two buildings comprising residential dwellings (Use Class C3) and commercial floorspace on ground floors with associated servicing, parking and refuse stores, amenity space, a commercial yard and soft landscaping.*	Permission Granted (24 March 2021)

App Ref.	Description	Status
	100 Beresford Avenue, Wembley, HA0 1QJ	
20/4232	*Installation of internally illuminated fascia (x2) and projecting/hanging signs (x3).* *Wembley Point*	Permission Granted (15 Feb 2021) Variation of Condition 2 granted September 2021
20/4143	*Demolition of existing building and basements and replacement with mixed-use development (24,712 sq. m GIA) incorporating 17 storey building and 3 basements, comprising: flexible light industrial (Class E)/B2/B8 employment space (in accordance with Part 3 of Schedule 2 (Class V) of The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)); Class C1 Hotel (including ancillary gym, spa and swimming pool); Class F.1 Conference Centre; Class F.2 community hub; basement car parking accessed from Oxgate Lane (providing 76 car parking spaces); cycle parking; internal service yard; coach drop-off lay-by; management and back of house areas; plant; roof garden and outdoor terraces; public realm improvements and associated works.* *403-405 Edgware Road, Cricklewood, London, NW2 6LN*	Awaiting Decision (Validated 09 Feb 2021)
19/2891	*Full planning application for the construction of a mixed use building comprising new homes (Use Class C3), flexible workspace and community space, landscaped courtyards and playspace, wheelchair and cycle parking, signage and wayfinding and associated plant and infrastructure.* *Land at junction of Cecil Avenue and High Road, Wembley, HA9.*	Permission Granted (05 Feb 2021)
19/3092	*Demolition of the existing building and erection of a new building up to a maximum height of 39.6m (AOD) comprising up to 5,000sqm residential floorspace (Use Class C3), up to 600sqm of flexible workspace (Use Class B1A, B and C), with ancillary cafe (Use Class A3) up to 600sqm ancillary floorspace, associated hard and soft landscaping, wheelchair car and cycle parking.* *Ujima House, 388 High Road, Wembley, HA9 6AR*	Permission Granted (05 Feb 2021) Eleven discharge of conditions applications submitted in 2023. One reserved matters application has been submitted in Oct 2023 and two NMA

App Ref.	Description	Status
		application have been granted in Oct and Jul 2023
19/2891	*Full planning application for the construction of a 5 to 9-storey mixed use building comprising 250 new homes (Use Class C3), up to 3,622sqm of flexible workspace and community space (Use Classes A3, B1(a), B1(b) & (c) and D1/D2), with a minimum community floorspace provision of 667sqm. Landscaped courtyards and playspace, wheelchair and cycle parking, signage and wayfinding and associated plant and infrastructure.* *Land at junction of Cecil Avenue and High Road, Wembley, HA9*	Permission Granted (05 Feb 2021) Four discharge of conditions applications have been submitted in 2023. Three NMA applications have been granted in 2023.
19/4541	*Demolition of the existing buildings and structures, the erection of a 'co-location' scheme ranging in height from 4 to 19 storeys, incorporating industrial floorspace (Use class B1b/B1c) with 124 residential units (Use class C3), together with associated landscaping, vehicular access arrangements, car and cycle parking, servicing and refuse and recycling facilities.* *2A, Part of Former Westend Saab and Boyriven Textile, Bridgewater Road, Wembley, HA0 1AJ*	Permission Granted (10 Dec 2020)
20/0345	*Demolition of existing buildings and erection of a new mixed use building ranging in height from two to nine storeys, to provide new homes (Use Class C3), affordable workspace (Use Class B1), new further education college (Use Class D1), with associated amenity areas, public realm improvements, car and cycle parking and refuse/recycling stores.* *1 Morland Gardens, London, NW10 8DY*	Permission Granted (30 Oct 2020). No works commenced, application expired.
18/4847	*Demolition of the existing two storey building (Use class B1) and redevelopment to provide a 24-storey building comprising 130 residential dwellings (37 x 1bed, 75 x 2bed and 18 x 3bed) with associated car and cycle parking, provision for bin stores, landscaping and ancillary works (revised description).* *Argenta House, Argenta Way, London, NW10 0AZ*	Permission Granted (18 Aug 2020) Variation of conditions 2 and 15 approved Apr 2022. One NMA application granted Dec 2021. Seven approval of

App Ref.	Description	Status
		details applications approved, with the latest in June 2023.
19/0395	*Erection of a part-3, part-5, and part-7 storey roof top extension to existing building to create 88 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 provide 31 flats, a total of 119 self-contained flats (12 x studios, 63 x 1 bed, 15 x 2 bed and 29 x 3 bed) 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).* *1 Olympic Way, Wembley, HA9 0NP*	Permission Granted (30 June 2020)
18/3111	*Erection of 2 residential blocks (17 and 19 storeys) connected at ground floor level comprising 256 self-contained apartments, lower ground floor, 166sqm of flexible workspace (Use Class B1) on upper ground floor and roof top amenity, provision for car and cycle parking, refuse and associated communal spaces and hard and soft landscaping. This application is accompanied by an Environmental Statement.* *Land, garages, alleyway rear of 416-444, High Road, Wembley, HA9*	Permission Granted (06 April 2020)
15/5564	*Demolition of the existing office building Trinity House and to construction 50 residential units, together with onsite car parking, landscaping and amenity space (amended description), subject to Deed of Agreement dated 26 Marc 2020 under Section 106 of Town and Country Planning Act 1990, as amended.* *Trinity House, Heather Park Drive, Wembley, HA0 1SU*	Permission Granted (30 March 2020)
19/3735	*New Structure: Erection of a 5-storey vehicle storage deck to the south-west corner of the warehouse site involving alteration of the ground level. Warehouse facade: Installation of 2 no. roller shutter doors to south elevation and 2 no. roller shutter doors and 2 no. egress ramps to north elevation, alterations to cladding. Service Yard and Car Park: Reconfiguration of the internal road and car parking area, relocation of the main entrance gates, extended hard-standing to provide parking spaces and associated soft landscaping.* *1 Hannah Close, London, NW10 0UX*	Permission Granted (13 March 2020)
20/0700	*Outline planning permission (with all matters reserved apart from the means of access) for demolition of existing buildings on site and provision of up to 1,600 homes and up to 51,749 sqm (GIA) of new land use floorspace within a series of buildings, with the maximum quantum as follows:*	Awaiting decision (Submitted 26 Feb 2020)

App Ref.	Description	Status
	-(Use Class C3) Residential: up to 1,600 homes; *-up to 50,150m2 floor space (GIA) of new student facilities including Student Accommodation, Teaching facilities, Sports facilities, and ancillary retail and commercial (Use Class A1, A2, A3)* *-up to 412sqm floorspace (GIA) of a replacement nursery (Use Class D1)* *-up to 1187sqm (GIA) of flexible new retail space (Use Class A1, A2, A3)* *Together with energy centre, hard and soft landscaping, open space and associated highways improvements and infrastructure works* *This application is subject to an Environmental Statement* *Land adjacent to Northwick Park Hospital, Nightingale Avenue, London, HA1*	
19/3591	*Demolition of the existing commercial buildings and removal of associated storage containers and construction of a part two, part three storey mixed-use office building (Use class B1a and Use class B1c) with provision of 28 cycle parking spaces, 14 car parking spaces, electric car charging points and associated landscaping.* *93 Manor Farm Road, Wembley, HA0 1XB*	Permission Granted (21 Feb 2020)
19/4224	*Installation of new modernised facade to three elevations of the building with associated external alterations, new roof top plant and the addition of new infill floor space for flexible residential (Use Class C3) and office (Use Class B1) use.* *Wembley Point*	Permission Granted (24 Jan 2020)
19/2688	*Demolition of the existing two-storey building and structures associated with the adjacent recreational sites and construction of a part 4-storey and part 5-storey building comprising D1 use on the ground floor and 29 residential units from part-ground to 4th floors. Works to include creation of communal roof terraces at 4th floor level, mechanical plant room, 48 cycle parking spaces, waste storage and associated landscaping.* *19 Dudden Hill Lane, London, NW10 2ET*	Permission Granted (23 Jan 2020) Eighteen discharge of condition applications have been granted, with the latest approved Dec 2023. One NMA application was granted Sep 2022 and one verification of condition 2 application was

App Ref.	Description	Status
		granted Oct 2022.
18/4810	*Demolition of the former day centre and redevelopment of the site to provide an apartment block rising to 5 storeys comprising 13 flats (4 x 1 bedroom and 9 x 2 bedroom), 14 houses rising to 3 storeys (10 x 3 bedroom and 4 x 4 bedroom), and one apartment block rising to 5 storeys comprising 40 studio flats with an element of care (Use Class C3(b)) with associated amenity space and landscaping, the creation of a new loop road, car parking, cycle storage and refuse storage.* *Stonebridge Primary School Annexe, Twybridge Way, London, NW10 0ST*	Permission Granted (24 June 2019) One non-material amendment and two variation of conditions applications granted in 2020.
18/4199	*Demolition of the existing buildings and construction of 4 buildings ranging in height from 14 to 23 storeys, comprising 474 residential units at 1st to 23rd floors (140 x 1-bed, 263 x 2-bed and 71 x 3-bed), mixed commercial use at ground and part 1st floor including a new public house (Use Class A4) retail floorspace (Use Classes A1, A2, and/or A3), workspace (B1b/c), and an office (B1a), together with associated public realm improvements; soft/hard landscaping; creation of a canal side walkway, new access arrangements, car and cycle parking; servicing, refuse and recycling facilities and subject to a Deed of Agreement dated 14 June 2019 under Section 106 of the Town and Country Planning Act 1990, as amended.* *Alperton House, Bridgewater Road, Wembley, HA0 1EH.*	Permission Granted (17 Jun 2019)
18/4199	*Demolition of the existing buildings and construction of 4 buildings ranging in height from 14 to 23 storeys, comprising 474 residential units at 1st to 23rd floors (140 x 1-bed, 263 x 2-bed and 71 x 3-bed), mixed commercial use at ground and part 1st floor including a new public house (Use Class A4) retail floorspace (Use Classes A1, A2, and/or A3), workspace (B1b/c), and an office (B1a), together with associated public realm improvements; soft/hard landscaping; creation of a canal side walkway, new access arrangements, car and cycle parking; servicing, refuse and recycling facilities and subject to a Deed of Agreement dated $ under Section 106 of the Town and Country Planning Act 1990, as amended.* *Alperton House, Bridgewater Road, Wembley, HA0 1EH*	Permission Granted (17 June 2019)
19/0073	*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).* *York House, Empire Way, Wembley, HA9 0PA*	Permission Granted (07 June 2019) Two discharge of condition applications approved, latest in Nov 2022.

App Ref.	Description	Status
		NMA approved May 2020. Variation of Condition 2 application granted Jan 2021
19/0481	*Certificate of lawfulness for proposed new facade and infill volume to be built at the same time as/or prior to the development conversion of the original building to residential use under permitted development rights of Full Planning Permission reference 18/4535 dated 24 January, 2019, for Installation of new modernised facade to three elevations of the building with associated external alterations, new roof top plant and the addition of new infill floor space for flexible residential (Use Class C3) and office (Use Class B1) use.* *Wembley Point*	Permission Granted (22 May 2019) Variation of Condition 2 granted September 2021
18/3381	*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.* *10 & 11 Watkin Road, Wembley, HA9 0NL*	Permission Granted (15 March 2019) 11 discharge of condition applications granted, with the latest in June 2022.Two NMS applications have been granted, with the most recent in July 2020
18/0752	*Demolition of existing buildings at Afrex House, and redevelopment to provide a residential development of 3-5 storeys for 31 residential units (9 x 1bed, 18 x 2 bed, 4 x 3 bed), creation of public realm and alterations, landscaped amenity space, car and cycle parking.* *All Units at Afrex House, Beresford Avenue, Wembley, HA0 1NX*	Permission Granted (08 March 2019)
18/4535	*Installation of new modernised facade to three elevations of the building with associated external alterations, new roof top plant and the addition of new infill floor space for flexible residential (Use Class C3) and office (Use Class B1) use.* *Wembley Point*	Permission Granted (24 Jan 2019)
18/3125	*Prior approval for change of use from office (Use Class B1) to residential (Use Class C3) involving the creation of 439 residential units, provision of 46 car parking spaces and*	Permission Granted (19 Dec 2018)

App Ref.	Description	Status
	secure cycle storage and subject to a Deed of Undertaking dated 17/12/2018 under Section 106 of the Town and Country Planning Act 1990, as amended. *Wembley Point*	
18/3838	*Erection of a cycle storage structure.* *Wembley Point*	Permission Granted (30 Nov 2018)
18/1592	*Demolition of existing hotel buildings and erection of a part 3, part 4 and part 5 storey 226 bed aparthotel plus basement accommodation comprising guestrooms and ancillary facilities within a 5-storey basement (situated below the part-basement lower ground floor), together with soft and hard landscaping, servicing, cycle storage and refuse and recycling facilities.* *1-7, 9, 11 & 11A Elm Road, Wembley, HA9 7JA*	Permission Granted (17 Oct 2018)
18/0321	*Hybrid planning application for the redevelopment of Northfield industrial estate: Outline planning permission for the demolition of existing buildings and structures on the site, all site preparation works and redevelopment to provide new buildings ranging from 35.75m AOD to 111.95m AOD in height, with a total floorspace (GEA) of up to 309,400 sq m (excluding basement up to 42,000 sq m GEA) to accommodate 2,900 homes (Use Class C3), business and storage and distribution (Use Classes B1a, B1c and B8), commercial (Use Classes A1, A2, A3, A4 and A5), community and leisure (Use Classes D1 and D2) including community centre and nursery, new basement level including energy centre, associated storage, cycle and vehicle parking, new vehicular accesses, associated highway works to Beresford Avenue, landscaping and creation of new public and private open space, ancillary facilitating works, various temporary meanwhile uses, interim works and infrastructure.* *Full planning permission for demolition of existing buildings and structures on the site, all site preparation works and the development of Phase 1 (Buildings A, B, C and D ranging from 1 to 14 storeys in height) to comprise 400 homes (Use Class C3); 910 sq m (GEA) of business floorspace Use Class B1a); 1,290 sq m (GEA) of commercial floorspace (Use Classes A1, A2, A3, A4 and A5); and 1,610 sq m (GEA) of community and leisure floorspace (Use Classes D1 and D2), including a community centre and nursery; together with new basement level including energy centre, associated storage, cycle and vehicle parking, new vehicular accesses, associated highway works to Beresford Avenue, landscaping and creation of new public and private open space, ancillary facilitating works, various temporary meanwhile uses, interim works and infrastructure.* *Former Northfield Industrial Estate & units 2-18 Beresford Avenue & Abbey Works Estate, Wycombe Road, Wembley,*	Permission Granted (28 Sept 2018) 40 discharge of condition applications have been submitted, with the most recent submitted Nov 2023. One minor-material amendment application granted in 2019. Reserved Matters application granted June 2019. Six NMA applications submitted, all granted except one submitted Nov 2023.

App Ref.	Description	Status
	HA0 & Ace Corner & Capital House, North Circular Road, London, NW10	
18/2197	*Prior approval for change of use of part ground, 4th to 8th floors, part of the 9th floor and 10th to 15th floors from office (Use Class B1) to residential (Use Class C3) involving the creation of 305 residential units (277 studio flats, 12 x 1-bed, 1-person flats and 16 x 1-bed, 2-person flats).* *York House, Empire Way, Wembley, HA9 0PA*	Permission Granted (10 Aug 2018)
18/2278	*Prior approval for change of use from office (Use Class B1a) to residential (Use Class C3) involving the creation of 34 residential units (22 x studio, 4 x 1 bed and 8 x 2 bed) including 12 car parking spaces, 30 cycle spaces and refuse storage.* *Units 29, 30 and 31 Cygnus Business Centre, Dalmeyer Road, London, NW10 2XA*	Permission Granted (10 Aug 2018)
18/2120	*Change of use from office (Use Class B1(a)) to residential (Use Class C3) at part-ground, 1st and 2nd floors to provide 29 residential units.* *Empire House, Empire Way, Wembley, HA9 0EW*	Permission Granted (31 July 2018)
18/1970	*Prior approval for change of use of part ground, 1st to 8th floors, part of the 9th floor and 10th to 14th floors from office (Use Class B1) to residential (Use Class C3) involving the creation of 305 residential units (277 studio flats, 12 x 1-bed, 1-person flats and 16 x 1-bed, 2-person flats).* *York House, Empire Way, Wembley, HA9 0PA*	Permission Granted (18 July 2018)
18/1969	*Prior approval for change of use of part ground, 1st to 8th floors, part of the 9th floor and 10th to 14th floors from office (Use Class B1) to residential (Use Class C3) involving the creation of 346 residential units (315 studio flats, 14 x 1-bed, 1-person flats and 17 x 1-bed, 2-person flats).* *York House, Empire Way, Wembley, HA9 0PA*	Permission Granted (18 July 2018)
17/3188	*Demolition of existing hotel buildings and erection of a part 3, part 4 and part 5 storey 128 bed aparthotel plus basement accommodation comprising guestrooms and ancillary facilities within a 4-storey basement (situated below the part-basement lower ground floor), together with soft and hard landscaping, servicing, cycle storage and refuse and recycling facilities (revised description).* *1-7, 9, 11 & 11A Elm Road, Wembley, HA9 7JA*	Permission Granted (12 Jan 2018) Certificate of Lawfulness for existing implantation of the permission has been granted (December 2021)

App Ref.	Description	Status
16/4478	*Demolition of existing buildings at Abbey Wharf, Delta Centre and all of 152 Mount Pleasant and redevelopment to provide a residential-led, mixed-use development of up to 6 storeys comprising 135 residential units (34 x 1bed, 79 x 2bed and 22 x 3bed) and 247sqm of commercial space (A1, A2, A3, B1, D1 and D2), landscaped amenity space, car and cycle parking and associated works.* *All Units at Abbey Wharf & Delta Centre and All of 152, Mount Pleasant, Wembley, HA0*	Permission Granted (18 Dec 2017) Confirmation of Compliance application granted June 2022.
17/3244	*Installation of new modernised facade to the three elevations of the building with associated external alterations.* *Wembley Point*	Permission Granted (12 Oct 2017)
16/0760	*Redevelopment of the site and surrounding land to include the demolition of the existing centre (Use class D1) and construction of five residential blocks ranging from 1 to 6 storeys high, comprising 178 residential units (67 x 1bed, 84 x 2bed, 14 x 3bed, 3 x 4bed, 8 x 3bed houses, 2 x 4bed houses) with associated private and communal amenity space, parking, access, landscaping and ancillary works.* *Harlesden Christian Centre & Land next to and rear of Harlesden Christian Centre, Winchelsea Road, NW10 8UN*	Permission Granted (02 May 2017) Twenty approval of details applications submitted and granted, with the latest in Feb 2021. Three NMA applications have been granted, with the latest in Aug 2020. Condition 2 was varied in Dec 2018.
17/0729	*Prior approval for change of use from offices (Use class B1(a)) to residential (Use class C3) involving the creation of 36 x studio flats (applicable to 1st and 21st floors).* *Wembley Point*	Permission Granted (13 April 2017)
16/4997	*GPDO Prior Approval: Change of use floors 2nd to 20th (excluding part of 6th and 8th floors) and part of 21st floor from office (Use class B1a) to residential (Use class C3) involving the creation of 382 x studios.* *Wembley Point*	Permission Granted (11 Jan 2017)
16/4944	*Prior approval for change of use of offices (Use Class B1a) into 22 dwelling units (Use Class C3) (applicable to floors 6th and 8th floors).* *Wembley Point*	Permission Granted (06 Jan 2017)
15/5550	*Hybrid planning application, accompanied by an Environmental Impact Assessment, for the redevelopment of the site including;-*	Permission Granted (23 Dec 2016)

App Ref.	Description	Status
	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 to15,000 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.* *York House, Empire Way, Wembley, HA9 0PA*	
16/3049	*Prior approval for change of use of ground floor along with floors 2-5, 7, 9-12,14-20 and part 21 from office (Use class B1a) into residential (Use class C3) involving the creation of 322 residential units (241 x studios, 73 x 1bed and 8 x 2bed).* *Wembley Point*	Permission Granted (07 Sept 2016)
15/0822	*Construction of two buildings ranging from 4 to 6 storeys high providing 109 residential units (4xstudio, 60x1-bed, 44x2 bed, 1x3 bed) together with community space (Class D1/D2), private and communal amenity space, new areas of public realm, basement and on-street car parking, vehicle and pedestrian access, landscaping and ancillary development at Stonebridge Site 27, Stonebridge, London.* *Land on site of former Craven Park Health Centre, Knatchbull Road, London*	Permission Granted (09 June 2016) A Confirmation of Compliance application was submitted and refused Sep 2020, there have been no other applications since

App Ref.	Description	Status
16/0073	*Outline planning permission for the demolition of the Former Day Centre and erection of 15x 2-storey houses (use class C3), one 4-storey apartment block comprising 5 x 1bed and 7x 2bed flats (use class C3) and one 4-storey apartment block comprising 28x 1bed flats with an element of care (use class C3b) and a new one-way access loop road and on-street parking bays with all matters reserved.* *Stonebridge Primary School Annexe, Twybridge Way, London, NW10 0ST*	Permission Granted (07June 2016)
16/0077	*Hybrid planning application comprising: Full planning permission for the demolition of the Former Adventure Playground; the construction of a two-storey building providing new nursery, assembly hall, reception and teaching facilities with first floor walkway connecting to the main school building; reconfiguration of Stonebridge Primary School's playground including the provision of two Multi-Use Games Areas and the erection of new perimeter fencing and the creation of 1.2ha of public open space with associated ancillary works ("Phase 1").* *and* *Outline planning permission for the erection of an apartment block up to 6-storey's comprising up to 51 residential units (16x 1bed, 25x 2bed and 10x 3bed flats) and 246sqm of commercial floorspace (Use class A3) and car parking at ground floor at Stonebridge Open Space, Hillside, the reconfiguration of Shakespeare Avenue, access to the residential units and up to 22x 3-storey houses (use class C3) at Open Space, Milton Avenue with all matters reserved.("Phase 2").* *The Stonebridge School Site & Adventure Playground, Shakespeare Avenue, Stonebridge Estate Open Space, Hillside and Open Space, Milton Avenue, NW10*	Permission Granted (07 June 2016) Twenty-four approval of details applications approved, with the latest in May 2023. Four non-material amendments have been granted, with the latest in Feb 2022. Two variation of conditions applications have been approved, with the latest in June 2022.
12/1293	*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.* *Kelaty House, First Way, Wembley, HA9 0JD*	Permission Granted (30 Oct 2012) Seventeen approval of details applications have been approved, with the latest March 2022. A number of successive variation of Condition 1 and 2 applications were submitted.

App Ref.	Description	Status
		The latest was approved in March 2020 (ref: 19/0882).
02/0945	*Change of use of buildings from offices to hotel, alterations to existing building elevations, erection of 2-storey-high extension to north building for use as conference and leisure facilities, erection of 6-storey link bridge between north and south buildings and erection of 2-level multi-storey car-park structure.* *Unysis and Bridge Park*	Permission Granted (01 July 2003) 2 approval of details applications permitted, latest in 2010.
97/1067	*Conversion to 330-bedroom hotel and erection of single-storey glazed extension linking the 2 existing blocks, new penthouse storey on front block facing North Circular Road, new single-deck car park, new boundary wall, and alteration to existing vehicular access onto Brentfield.* *Unysis and Bridge Park*	Permission Granted (24 Sept 1997)
96/1912	*Change of use of existing buildings from offices (Use Class B1) to hotel use (Use Class C1) (as amplified by additional information received 12/02/97).* *Unysis and Bridge Park*	Permission Granted (19 March 1997)

SLR is unaware of any other extant or proposed applications, allocations, National Infrastructure Projects (NSIP), Local Development Orders (LDOs) or known minerals development proposals within the LBB administrative area which may need to be considered as part any cumulative assessment.

Notwithstanding, consideration of the effects associated with existing operational developments within the immediate vicinity of the application site (such as existing retail operations or schools) will already be contained within the technical assessments given that they will form part of the baseline environment.

If the authority is aware of any other proposals that it considers will need to be assessed in terms of potential cumulative effects, these should be identified as part of the EIA Scoping Opinion duly adopted by LBB.

6.0 Environmental Issues to be 'Scoped In'

6.1 Townscape & Visual

6.1.1 Introduction

This section sets out the proposed approach to the assessment of likely significant townscape and visual effects of the proposed development, as described in Section 4.

6.1.2 Existing Environment (Baseline)

6.1.2.1 Designations

The Site is not covered by any townscape related designations. There are a small number of designations and heritage assets in close proximity to the Site which contribute to the local townscape character and are summarised in the list below and illustrated at Figure 2 of Appendix D. Issue relating to heritage significance will be dealt with by the appointed heritage consultant.

- Brent Viaduct is identified as a grade II listed structure, c.250m to the southwest of the Site.
- Stonebridge School is identified as a grade II listed building that is located c.450m to the southeast of the Site.
- Stonebridge Park Public House is identified as a grade II listed building, located c.570m to the southeast of the Site.
- The Stonebridge Centre is a locally listed building located c.700m to the southeast of the Site.
- The railway tracks and associated tree belt which abuts the southern boundary of the Site is identified as a 'wildlife corridor' and the trackside to the north of the tracks is a grade I Site of Importance for Nature Conservation (SINC) ((Harlesden to Wembley Central including Wembley Brook).
- A number of public open spaces are identified on the Policies Map, the closest of which is Wyborne Way Open Space to the east of Sunny Crescent. Stonebridge Recreation Ground, Hillside to the southeast is a public open space and Locally Listed Park and Landscape. Brent River Park (Tokyington Recreation Ground) to the north is identified as a 'Green Chain', 'Locally Listed Park and Landscape' and public open space.

6.1.2.2 Townscape Character

In order to define townscape character receptors at a scale appropriate to the Site and Study Area, local townscape character areas (TCAs) have been identified. In this process, local level changes in characteristics that relate to physical elements or features and historic development, alongside how a place is experienced, have been considered. Where appropriate, this has also taken account of planning policy guidance and the townscape receptors identified in TVIAs for the consented developments that surround the Site. The Old Oak and Park Royal Development Corporation area (OPDC) Character Areas Study has also been referenced.

This process has resulted in the identification of five TCAs within the Study Area which each share common features and characteristics, as listed below and illustrated at Figure 3 of Appendix D.

- TCA1: Stonebridge Point Blocks and commercial
- TCA2: Railway Sidings
- TCA3: Tokyngton and Alperton North
- TCA4: Stonebridge Residential
- TCA5: Premier Park

6.1.2.3 Landmark & Tall Buildings

Wembley Point, located on the northern side of the North Circular is 21 storeys in height. The former office building has been converted to residential apartments. Further consented development surrounding Wembley Point, to the north of Argenta Way will introduce a cluster of tall buildings up to 32 storeys in height.

Local landmarks in the townscape context include the iconic Wembley Stadium which is often seen on the skyline in views from the surrounding area alongside tall buildings as part of large redevelopment surrounding the stadium.

6.1.2.4 The Site

The Site itself is low lying and relatively flat due to its land use and proximity to the River Brent. In the surrounding area there is a lot more variety and there are a series of local high points which provide elevated vantage points for views of the surrounding townscape.

The Site itself contains a small number of trees to its outer peripheries. Tree species include Horse Chestnut, Sycamore, Cherry, Silver Birch and Rowan. There are a few pockets of scrub and understorey species adjacent to the southern boundary, which include Hawthorn, Blackthorn and Dogwood. There are a number of small beds of ornamental shrub planting along the Brentfield Road frontage.

Several areas of Japanese Knotweed have been identified by the ecology survey within the north-western and south-eastern margins of the site.

The Site contains a number of existing buildings which range in height from two to eight storeys. The built form within the Site can be summarised as follow:

- Unisys towers - Unisys towers were built in c. 1977 pursuant to a Seiffert design. The southern building is seven storeys (approximately 27m tall); the northern block is eight storeys (approximately 30m tall). Both buildings have a similar appearance comprising of a curved concrete structure with a simple arrangement of windows to concrete panels and a strong horizontal and vertical rhythm. The roof line is simple with little detailing. The buildings are currently in a poor condition and under croft parking results in a poor relationship with the surrounding streetscape;
- Bridge Park Community Leisure Centre – The modest low-rise building comprises of an extended one and two storey structure (up to approximately 11m tall) constructed from rendered block and connected building which is clad in a blue metal cladding. Parts of the southern half of this building have a pitched tiled roof with remaining northern section clad in metal. The entrance including building signage is located to the eastern elevation of the block and aligns with a decorative gateway which provides pedestrian access into the Site from the A404. Parts of this building were formerly a bus and tram shed; and
- Technology House and New Life Christian Centre – The building comprises of a modest, two storey, brick building (approximately 8m tall). The block has a simple form comprising of a curved structure with flat roof and little detailing. The building sits close to the south eastern boundary of the Site.

The remaining areas of the Site comprise of the car parking and service yards of the aforementioned buildings and the scrap yard. These areas are largely surfaced with tarmac with little vegetation resulting in a poor-quality external environment. Railings contain the edges of the Site with gated access provided from the A404. Two brick substations are located adjacent to the north eastern boundary of the site and is accessed directly from the public pavement. The built form does not relate to the surrounding streetscape, being set away from the pavement and comprising a number of blank facades. Metal palisade fencing to the Site boundaries surrounding the Unisys buildings also have a detrimental influence on the surrounding streetscape.

6.1.2.5 Visibility of the Site

The visibility of the Site has been established through desktop analysis of the surrounding area and then by confirming on site the localised screening effect of existing topography, street patterns, built form and any vegetation. As part of this baseline appraisal, a computer-generated Zone of Theoretical Visibility (ZTV) based on the architect's feasibility scheme was produced and is set out at Figure 4 of Appendix D. This tested a maximum building height of +107.30m AOD or 28 storeys with massing information provided by Dextor Moren Associates (DMA) architects in May 2021[4]. ZTV mapping is a tool that can be used in the early stages of a project to help identify the potential visibility of a development from specific locations in the wider environment.

The ZTV mapping utilises LiDAR data with 1m grid resolution, incorporating available information on existing topography, built form and mature vegetation. The dark blue colour wash indicates where views of Proposed Development are potentially most visible with the colour range reducing the light blue where the Proposed Development is likely to be least visible; and the white/grey areas indicate where the Proposed Development is likely to be obscured. The grading of colours indicates the changing extent of visibility.

The ZTV is not entirely accurate, due to not all vegetation or recent development being included in the 3D model. Resultantly, the process tends to give a larger extent of visibility of the proposals than would happen in reality. However, it is a useful starting point to help identify the key views likely to be affected. These were then tested during the Site visit and subsequent testing using Vu.City. The ZTV was produced for an area within a 3km radius of the Site. (There are likely to be some more distant viewpoints beyond this from which the development would be visible but would appear as a very small feature in the background of the view and visual impacts from this distance would not be significant.)

As demonstrated by the ZTV and as confirmed during the site visit, the principle areas where the Site and the Proposed Development would be visible are the roads running past the Site boundary (A404 and North Circular); parts of the adjacent Overground line including Stone Bridge Park station platforms; pedestrian bridges crossing over the North Circular; a small number of residential streets in close proximity to the Site (Conduit Way, Tokyngton Avenue; and, surrounding public open spaces (Stonebridge Recreation Ground, Brent River Park and Sunny Crescent open space). The ZTV indicates extremely limited visibility from localised parts of Roundwood Park and One Tree Hill.

6.1.2.6 Visual Receptors & Representative Views

Visual receptors are the people who may be affected by changes in views and visual amenity. They include people passing through an area (e.g. by foot, car, bicycle or public

[4] Whilst building heights have increased since the ZTV was prepared, further testing of visibility has been carried out using Vu.City software and the ZTV remains relevant for the purposes of scoping visual receptors and viewpoints

transport), people working in an area and people visiting or engaged in recreational activities.

The key visual receptors which have been identified within the study area with potential to be affected by the Proposed Development are listed below. Although surrounding residential properties form a further receptor group, these are typically not be considered within a TVIA as views from private properties are not accessible and are not a material planning consideration[5] unless the impact of the proposals is likely to be so great that it would harm the residential visual amenity of the property (which, is not considered to be the case in this instance due to separation distances between the Site and closest residential properties on the north eastern side of the A404). However, for completeness, high level consideration will be given to the likely changes to views experienced by the closest residents on Brentfield and First Drive.

- Road users and pedestrians on A404
- Road users on the North Circular Road
- Users of London Overground/Bakerloo Line
- Road users and pedestrians on Conduit Way
- Road users and pedestrians on residential streets to the east of the Site within the area of Stonebridge
- Road users and pedestrians of residential streets to the north west of the Site within the area of Tokyngton
- Users of Brent River Park
- Users of Stonebridge Recreation Ground
- Users of Sunny Crescent / Wyborne Way Open Space
- Users of One Tree Hill Recreation Ground
- Users of Roundwood Park
- Pedestrians and users of open space within residential areas to the south of the railway line

In order to illustrate the effects on views experienced by the identified visual receptors, a series of Representative Viewpoints (RVs) have been identified and the locations are set out in Figure 5 of Appendix D. **Table 5** provides a list of the RVs, identifies the type of visualisation that will be prepared to inform the assessment and provides commentary on why the views have been chosen and visual receptor they represent. These are to be agreed with officers as part of this scoping process.

Table 5 Location of Representative Views

[5] Aldred's Case' in 1610 established that there is no legal right to a view for private dwellings

Representative Viewpoint Locations	Proposed Visualisation Type	Commentary
RV1 – Argenta Way Roundabout	Type 4 – render (AVR Level 3)	To demonstrate views experienced by road users and pedestrians on approach to Stonebridge Park Station.
RV2 – Harrow Road	Type 4 – render (AVR Level 3)	To demonstrate views experienced by road users and pedestrians on a key approach route towards the Site and from the local centre.
RV3 – Tokyngton Avenue/Aldbury Avenue	Type 4 – wireline (AVR Level 1)	To demonstrate views experienced from residential areas to the northwest of the Site.
RV4 – Conduit Way	Type 4 – render (AVR Level 3)	To demonstrate views experienced from residential areas to the northeast of the Site.
RV5 – Stonebridge Park	Type 4 – wireline (AVR Level 1)	To demonstrate views experienced from a local public open space
RV6 – Sunny Crescent open space	Type 4 – render (AVR Level 3)	To demonstrate views experienced from a local public open space
RV7 – North Circular northern approach	Type 4 – wireline (AVR Level 1)	To demonstrate views experienced on approach to the site from the north on a busy vehicular thoroughfare
RV8 – Brent River Park	Type 4 – wireline (AVR Level 1)	To demonstrate views experienced from a local public open space
RV9 – Roundwood Park	Type 4 – wireline (AVR Level 1)	To demonstrate views experienced by users of this public open space and the proposed development's influence on the skyline as experienced within a Registered Park and Garden.
RV10 – North Circular pedestrian and cycle bridge south	Type 4 – render (AVR Level 3)	To demonstrate views experienced on a pedestrian and cycle approach route to the Stonebridge Park area from the south.
RV11 – North Circular pedestrian bridge north	Type 4 – wireline (AVR Level 1)	To demonstrate views experienced by pedestrians crossing the North Circular.
RV12 – North Circular southern approach	Type 4 – wireline (AVR Level 1)	To demonstrate views experienced by road users on approach to the site from the south on a busy vehicular thoroughfare.
RV13 – Kenmere Gardens open space	Type 4 – wireline (AVR Level 1)	To demonstrate views experienced from a local public open space.
RV14 – Moyne Place	Type 4 – wireline (AVR Level 1)	To demonstrate views experienced from a residential area to the southwest of the Site.

RV15 - One Tree Hill Recreation Ground.	Type 4 – wireline (AVR Level 1)	To demonstrate views experienced by users of this public open space and the proposed development's influence on the skyline as experienced within a Locally Listed Park and Garden. View similar to a protected view of Wembley Stadium
RV16 – Hillside at the junction with Twybridge Way	Type 4 – render (AVR Level 3)	To demonstrate views experienced by road users and pedestrians on the main approach to the Site from the southeast

6.1.3 Legislation & Planning Policy Context

The following legislation and policy are relevant to the assessment of townscape and visual effects:

- European Landscape Convention
- National Planning Policy Framework (December, 2023)
- The London Plan 2021
    - Policy D1: London's form, character and capacity for growth
    - Policy D3: Optimising site capacity through the design-led approach
    - Policy D9: Tall buildings
    - Policy HC3: Strategic and Local Views
    - Policy HC4 London View Management Framework
- Brent Local Plan 2019-2041
    - Policy DMP1: Development management general policy
    - Policy BP5: South
    - Policy BSSA7: Bridge Park & Unisys Building
    - Policy BD1: Leading the Way in Good Urban Design
    - Policy BD2: Tall Buildings
    - Policy BGI1: Green and Blue Infrastructure in Brent
    - Policy BGI2: Trees and Woodlands

The following planning guidance documents are relevant to the assessment of townscape and visual effects:

- London View Framework Management Plan
- Brent Design Guide 2018
- Brent Tall Building Strategy: Local Plan Evidence and Design Guidance

The Site is allocated for development under the adopted Local Plan under Policy BSSA7: Bridge Park & Unisys Building and falls within a Tall Building Zone.

The Site does not fall within any of the Protected Vistas identified in the London View Management Framework or the View Focus / View Setting corridors identified on the Policies Map for the Protected Views of Wembley Stadium.

6.1.4 Characteristics of Potential Effects

6.1.4.1 Townscape Effects

Townscape effects will be considered during the operational phase only. Townscape effects include:

- Changes to, and/or complete or partial loss of features, elements, characteristics or perceptual aspects that contribute to the character and distinctiveness of the townscape/local townscape area; and/or,
- Introduction of new elements or features that influence the character and distinctiveness of the townscape/local townscape area.

6.1.4.2 Visual Effects

Visual effects will be considered during the operational phase only. Visual effects include:

- Changes to, and/or complete or partial loss of features, elements, characteristics or perceptual aspects that contribute to the character and distinctiveness of the view; and/or,
- Introduction of new elements or features that influence the character and distinctiveness of the view.

6.1.5 Study Area

A 1-kilometre radius of search from the centre of the Site has been established for the Study Area. This was considered appropriate from our professional assessment and analysis of the likely townscape and visual effects of new development of this type and scale on the wider urban area given the history, pattern, form and character of the surrounding townscape. There will be more distant areas beyond this with some inter-visibility with the Site. However, it is considered that the effects on receptors beyond the Study Area would be so minor that detailed assessment is not warranted. This approach is supported by the Guidelines for Landscape and Visual Impact Assessment, 3rd edition (GLVIA3) (Ref: 1.9) which states that the scale of assessment should be appropriate and proportional to the nature of the proposed development.

The visual appraisal will consider the approximate principal zone of visual influence of the proposal within this Study Area within 1km of the Site, with further long distant views being considered were identified and relevant. This has been informed by the production of the ZTV which identifies where in the surrounding townscape the proposed development is likely to be visible. The Site boundary and Study Area is identified within Figure 1 of Appendix D and the ZTV, which looks at a wider 3km study area, is set out at Figure 4.

6.1.6 Assessment Methodology

The methodology for townscape and visual assessment is based on current best practice as set out in:

- Guidelines for Landscape and Visual Impact Assessment, Third Edition;
- Townscape Character Assessment: Landscape Institute Technical Information Note 05/2017; and
- Visual Representation of Development Proposals: Landscape Institute Technical Information Note 06/19.

GLVIA3 states that this type of assessment provides a tool for identifying and assessing "*the effects of change resulting from development on both the landscape as an environmental resource in its own right and on people's views and visual amenity*" (Para. 1.1). It goes on to emphasise that the appraisal has two interlinked elements of: landscape, as a resource; and visual amenity, including views. The effects of both must be addressed in the assessment.

The definition of landscape in the ELC, which the UK has signed and ratified, includes villages and towns and cities and the GLVIA3 states that 'townscape' refers to areas where

the built environment is dominant. It goes on to state that townscape includes the buildings and the different types of urban spaces, and the relationship between the two.

6.1.6.1 Baseline Surveys

Desk Based Studies

A preliminary desk study of Ordnance Survey (OS) maps and aerial photography is undertaken to establish the physical components of the Site and its surroundings (including land use, topography, built form, accessibility, and vegetation) and identify potential townscape and visual receptors. Potential visual receptors, defined as the different groups of people who may experience views of the Project, within the surrounding area are also identified. Aerial photography is used to supplement this information.

Field Surveys

A field study is undertaken by a chartered landscape architect from Turley Townscape. The field study records the Site and surrounding context's townscape features and confirms the visual receptors identified in the desk study. The field study involves travelling throughout the study area and producing a working photographic record of the area.

The field study establishes the key characteristics of the local townscape character including the associated elements, features and aesthetic and perceptual factors which contribute to the townscape. The approximate visibility of the Site is established by the walkover survey which considers the area within the study area from which the Site is currently visible and the key visual receptors within this area. A series of Representative Views experienced by these visual receptors is also identified.

Consultation

The scope and methodology of the assessment is agreed either independently with the LPA or as part of the EIA Scoping procedure. This includes identification of the townscape character receptors, visual receptors, and representative views.

6.1.6.2 Townscape Receptor Sensitivity

The baseline townscape appraisal includes a mixture of desk study and field work to identify and record the key townscape features and character of the townscape within the study area. The key townscape receptors (townscape character areas, townscape features or townscape characteristics) with potential to be affected by the Project are then identified and a judgement is made on the Value of each of these. This judgement is made based on the approach set out in GLVIA3 and as described below.

The Value of each of the identified townscape receptors is assessed with reference to the following criteria and the definitions of level of value set out in **Table 6**:

- Any designations or policies (both national and local) which may be present; and,
- The presence or absence of other attributes which contribute to townscape value such as condition, scenic quality, rarity, representativeness, conservation interests, recreation value, perceptual aspects or associations e.g. with writers, artists or historic events.

Table 6 Value of Townscape Receptors

Value	Typical Level of Designation / Rarity	Typical Examples
High	International, National, Regional	World Heritage Sites, and/or key features of World Heritage Sites, National Parks or National Landscapes and/or key features of these, Scheduled Monuments, some Conservation Areas, and townscape areas with typically a significant number of Grade I/II* listed buildings, and/or Registered Historic Park and Gardens. No or limited potential for substitution.
Medium	Regional, Local	Townscape areas designated at local level e.g. local townscape designations, some conservation areas and other undesignated areas or features of notable scenic quality or recreational value with value perhaps expressed through non-official publications or demonstrable use. Limited potential for substitution.
Ordinary	Local	Townscape features or character areas which are not related to designated, or non-designated heritage assets, or a planning designation; and/or mentioned in guidebooks or on tourist maps; and/or referenced in art and literature; and/or is of little scenic or townscape importance. Considerable potential for substitution.
Low	Local	Townscape features or local character areas in poor condition or quality and/or identified for recovery.

The sensitivity of townscape receptors relates to the value attached to that receptor (which is established as part of the baseline assessment) and the susceptibility of the receptor to the type of change or development proposed. GLVIA3 defines susceptibility as "*the ability of the landscape receptor (whether it be the overall character or quality/condition of a particular landscape type or area, or an individual element and/or feature, or a particular aesthetic and perceptual aspect) to accommodate the Proposed Development without undue consequences for the maintenance of the baseline situation and/or the achievement of landscape planning policies and strategies*" (Ref: 1.9 Para. 5.40). Judgements on the susceptibility to change of each of the identified townscape receptors are made based on the scale set out in **Table 7.**

Table 7 Susceptibility to Change of Townscape Receptors

Susceptibility to change	Description
High	Townscape receptor[6] would be unlikely to accommodate the type of development proposed without undue negative consequences for the maintenance of the baseline townscape character and/or the achievement of townscape planning policies and strategies. Townscape receptor has little or no relationship to the type of development proposed

[6] Includes townscape character areas, townscape elements or features and particular aesthetic or perceptual aspects of the townscape

Susceptibility to change	Description
	and/or would be difficult to replace or substitute if lost. Characteristics of the townscape which contribute to the townscape character are highly sensitive and would be fundamentally altered by the type of development proposed.
Medium	Townscape receptor would be compromised by the type of development proposed and/or the achievement of townscape planning policies and strategies would be compromised. Townscape receptor has some relationship to the type of development proposed and/or could be partially replaced or substituted if lost. Townscape receptor is moderately sensitive and characteristics of the receptor would be altered by the type of development proposed. The general townscape character would remain but would be weakened by the type of development proposed.
Low	Townscape receptor would be likely to accommodate the type of development proposed without undue negative consequences for the maintenance of the baseline townscape character and/or the achievement of townscape planning policies and strategies. Townscape receptor has a close relationship to the type of development proposed and could be easily replaced or substituted if lost. Townscape receptor is of low sensitivity and characteristics of the townscape would not be significantly altered by the type of development proposed. The general townscape character is resilient to change.

A judgement on the overall sensitivity of each townscape receptor (ranging from High to Negligible) is made. This is based on the combined evaluation of susceptibility and value attached to the receptor, together with informed professional judgement and guidance provided in GLVIA3. For example, a townscape receptor that has a High Sensitivity is likely to have a High Value and a High Susceptibility to change, a townscape receptor that has a Low Sensitivity is likely to have a Low Value and a Low Susceptibility to change.

6.1.6.3 Visual Receptor Sensitivity

The baseline visual appraisal establishes the area in which the Site, and emerging Proposed Scheme, may be visible; the different groups of people who may experience the views of the development (defined as visual receptors); and, the nature of these views.

In most townscape and visual assessments, unless specifically requested by the LPA, visual receptors are restricted to groups of people in publicly accessible places. Normally, views from private residential properties are not included as changes to private views are not a planning consideration unless the development is likely to be so overbearing or dominating that they could result in unacceptable living conditions. Where this is possible, a separate residential visual amenity assessment (RVAA) is undertaken.

Following identification of the key visual receptors, representative views are identified to reflect typical views from the key visual receptors. A description and evaluation of the identified views is then undertaken which takes into account the following:

- type and relative numbers of people, and their occupation or activity;
- location, nature and characteristics;
- nature, composition and characteristics of the views (including directions);

- elements which may interrupt, filter or otherwise influence the views; and,
- seasonal changes in the view.

The sensitivity of the visual receptor comprises a judgement on the value attached to the views and an assessment of the susceptibility of each receptor to the type of change proposed.

A judgement on the value attached to the views is made with reference to the following criteria and the definitions of value set out in **Table 8**.

- Planning designations e.g. Designated Views or Protected Vistas identified in local or regional planning policy;
- Other designations relating to landscape features or heritage assets e.g. key views identified in conservation area appraisals or recorded in citations for listed buildings or registered parks and gardens; and,
- Indicators of the value attached to views by visitors e.g. views identified in guidebooks or on tourist maps, official viewpoints (often with sign boards and interpretive material) or views referenced in literature or art.

Table 8 Value attached to views.

Value	Typical level of designation / Rarity	Typical Examples
High	International, National, Regional,	Designated views of international, national or regional importance e.g. views of noted importance to sites of international or national importance e.g. World Heritage Sites, Scheduled Monuments, National Landscapes, Grade I/Grade II* listed buildings, and/or Registered Historic Park and Gardens
Medium	Regional, Local	Views identified or protected at local level e.g. identified in local planning policy or guidance and views associated with heritage or townscape features of regional or local importance e.g. some Conservation Areas and Grade II/II* listed buildings. May also include views which are undesignated but value perhaps expressed through non-official publications or its contribution to enjoyment of a designated or non-designated heritage asset.
Ordinary	Local	The view from the identified visual receptor is not related to designated, or non-designated, heritage assets, or a planning designation; and/or mentioned in guidebooks or on tourist maps; and/or referenced in art and literature; but contributes positively to the visual amenity experienced by the receptor.
Low	Local	The view from the identified visual receptor does not make a positive contribution to local visual amenity.

The assessment of susceptibility of visual receptors is based on the approach set out in para 6.32 of GLVIA3 which notes that:

- *"The susceptibility of different visual receptors to changes in views and visual amenity is mainly a function of:*
- *The occupation or activity of people experiencing the view at particular locations: and,*
- *The extent to which their attention or interest may therefore be focussed on the views and the visual amenity they experience at particular locations"*.

Judgements on the susceptibility of a visual receptor to change are broadly based on the descriptions of susceptibility set out in **Table 9**.

Table 9 Susceptibility to Change of Visual Receptors

Susceptibility	Description
High	Receptors for whom the view and visual amenity is of high importance to the experience or activity including people engaged in outdoor recreation whose attention or interest is likely to be focused on the landscape/townscape and on particular views e.g. waymarked walks through the landscape/townscape; and visitors to heritage assets or other attractions where views of the surroundings are an important contributor to the experience.
Medium	Receptors for whom the view and visual amenity is of moderate importance to the experience or activity including Travellers on most road or rail routes
Low	Receptors for whom the view and visual amenity is of low importance to the experience or activity including: people engaged in outdoor sport or recreation which does not involve or depend upon appreciation of views of the landscape; and, people at their place of work whose attention may be focussed on their work, not on their surroundings, and where the setting is not important to the quality of working life.

A judgement on the overall sensitivity of each visual receptor (ranging from High to Negligible) is made. This is based on the combined evaluation of susceptibility and value attached to the receptor, together with informed professional judgement and guidance provided in GLVIA3. For example, a visual receptor that has a High Sensitivity is likely to have a High Value and a High Susceptibility to change, a visual receptor that has a Low Sensitivity is likely to have a Low Value and a Low Susceptibility to change.

6.1.6.4 Townscape Effects: Magnitude of Change

The assessment of townscape effects considers the sensitivity of the townscape receptor and the magnitude of the predicted effect. Significance is then concluded as major, moderate, minor or negligible, with significant effects determined through professional judgement.

The magnitude of townscape effect considers the size or scale of the effect, the geographical extent of the effect and the duration and reversibility of the effect. Judgements

on the magnitude of townscape effect are broadly based on the descriptions of magnitude set out in **Table 10**.

Consideration is also given to the Type of Effect in terms of whether it is Adverse, Beneficial, or Neutral. Often, effects will include a combination of both beneficial and adverse effects. However, a judgement has been made on the nature of the overall effect which is based on the following terms:

- Adverse: overall harm to townscape character/feature
- Beneficial: overall improvement to townscape character/feature
- Neutral: no overall harm or improvement to townscape character/feature

Table 10 Defining Magnitude of Change – Townscape Receptors

Magnitude of Change	Definition
Large	Permanent loss of all or most of the key characteristics of a townscape receptor and/or addition of major new elements which would be dominant features with little or no relationship to the townscape receptor. Changes would substantially alter the character of a large area.
Medium	Permanent partial loss or change to some of the key characteristics of a townscape receptor and/or addition of new elements which would be prominent features. Changes would result in a large change to the character of a small area or a noticeable change to a larger area.
Small	Permanent limited/localised loss or change to common characteristics of a townscape receptor and/or addition of new elements which would be noticeable features but largely in keeping with the existing character. Changes would result in a small change to the character of a large area or a noticeable change to a small area. Also includes temporary and/or reversible changes of larger scale or extent.
Negligible	No, or barely discernible, change to townscape receptor

6.1.6.5 Visual Effects: Magnitude of Change

The assessment of visual effects considers the sensitivity of the visual receptor and the magnitude of the predicted effect. Significance is then concluded as major, moderate, minor or negligible, with significant effects determined through professional judgement.

The magnitude of visual effect considers the size or scale of the effect, the geographical extent of the effect, and the duration and reversibility of the effect. Judgements on the magnitude of visual effect are broadly based on the descriptions of magnitude set out in **Table 11**.

Consideration is also given to the Type of Effect in terms of whether it is Adverse, Beneficial or Neutral. Often, effects will include a combination of both beneficial and adverse effects. However, a judgement is made on the nature of the overall effect which is based on the following terms:

- Adverse: overall harm to the character/quality of the view and loss of visual amenity
- Beneficial: overall improvement to the character/quality of the view and improvement of visual amenity

- Neutral: no overall harm or improvement to the view or visual amenity

Table 11 Defining Magnitude of Change – Visual Receptors

Magnitude of Change	Definition
Large	Permanent loss of all or most of the key characteristics of a view and/or addition of major new elements which would be dominant features. Changes would substantially alter the character of the view.
Medium	Permanent partial loss or change to some of the key characteristics of the view and/or addition of new elements which would be prominent features. Changes would result in a large change to the character of a small part of the view or a noticeable change to a larger part of the view.
Small	Permanent limited/localised loss or change to a view and/or addition of new elements which would be noticeable features but largely in keeping with the existing character of the view. Changes would result in a small change to the character of a large part of the view or a noticeable change to a small part of the view. Also includes temporary and/or reversible changes of larger scale or extent within the view.
Negligible / None	No, or barely discernible, change to the view.

6.1.6.6 Assessment of Significance

The level of effect is informed by the magnitude of change due to the proposed development and the evaluation of the sensitivity of the affected receptor. The level of effect is determined using professional judgement and **Table 12** as a tool to assist with this process.

For each effect, it has been concluded whether the effect is '*beneficial*' or '*adverse*' or 'neutral[7]'.

Table 12 Matrix to support determining the level of effect.

		SENSITIVITY			
		High	**Medium**	**Low**	**Negligible**
MAGNITUDE	**Large**	Major	Moderate to Major	Minor to Moderate	Negligible

[7] GLVIA3 states at Para 5.37, p94 and p118 that an informed professional judgement should be made about whether the landscape or visual effects should be categorised as positive or negative (or in some cases neutral), with the criteria used in reaching this judgement clearly stated. Where Neutral effects are identified in this Chapter, it is based on the following criteria: '*no overall harm or improvement to the townscape, view or visual amenity (likely to be the result of a combination of both adverse and beneficial effects or very small changes)*.

	Medium	Moderate to Major	Moderate	Minor	Negligible
	Small	Minor to Moderate	Minor	Negligible to Minor	Negligible
	Negligible	Negligible	Negligible	Negligible	Negligible

The following terms define the level of the effects identified and these can be 'beneficial' or 'adverse' or 'neutral':

- **Major effect**: where the Proposed Scheme is likely to cause a considerable change from the baseline conditions and the receptor has limited adaptability, tolerance or recoverability or is of the highest sensitivity;
- **Moderate effect**: where the Proposed Scheme is likely to cause either a considerable change from the baseline conditions at a receptor which has a degree of adaptability, tolerance or recoverability or a less than considerable change at a receptor that has limited adaptability, tolerance or recoverability;
- **Minor effect**: where the Proposed Scheme is likely to cause a small, but noticeable change from the baseline conditions on a receptor which has limited adaptability, tolerance or recoverability or is of the highest sensitivity; or where the Proposed Scheme is likely to cause a considerable change from the baseline conditions at a receptor which can adapt, is tolerant of the change or/and can recover from the change; and
- **Negligible**: where the Proposed Scheme is unlikely to cause a noticeable change at a receptor, despite its level of sensitivity or there is a considerable change at a receptor which is not considered sensitive to a change.

The duration of the effect will be assessed as either 'short-term', 'medium-term' or 'long-term'. Short-term is considered to be up to 1 year, medium-term is considered to be between 1 and 10 years and long-term is considered to be greater than 10 years.

Determining Significance

For each residual effect, a statement is being made as to whether the level of effect is '**Significant**' or '**Not Significant**'. This determination is based on professional judgement and / or relevant guidance/legislation where applicable.

Significance is only concluded for residual effects (i.e. following the identification of secondary mitigation).

6.1.7 Potential Effects Not Requiring Further Assessment

- Night-time townscape and visual effects - As the surrounding townscape study area is already heavily lit by a variety of light sources, no assessment of night-time visual effects is proposed, as it is considered that any new light sources would not give rise to significant effects.
- Construction phase townscape and visual effects - In general terms, and based on professional experience and judgement, the demolition and construction effects of the Proposed Development would be no greater in size or scale or geographical

extent than that expected at the operational phase but would be of temporary duration. The effects on townscape and visual receptors during the construction phase are likely to be generally perceived as adverse in contrast to the effects following completion which are likely to be beneficial or neutral. This is due to the incomplete nature of buildings during the construction phase, the presence and operation of construction activities and temporary structures and the increased noise, traffic and dust associated with the construction works. These effects would be managed and mitigated through measures set out in a CEMP including the use of site hoardings installed on the perimeter of the Site prior to construction, management of construction traffic and control of working hours. Due to these mitigation measures, the temporary nature of construction works and the current baseline of the Site's townscape context, which is influenced by ongoing construction works, the perceived changes to townscape character and visual amenity would not give rise to significant effects.

6.2 Ground Conditions & Contamination

6.2.1 Introduction

The ground conditions and contamination chapter of the ES will examine the soil and groundwater conditions beneath the Site and assess the potential for significant contamination to be present.

6.2.2 Existing Environment (Baseline)

A phased assessment of the study Site has previously been undertaken by BuroHappold Engineering (BHE) and their findings have been provided as the following reports:

- Phase I Geoenvironmental Desk Study (ref: 034580, 18 December 2015; and
- Ground Engineering Interpretative Report (ref: 34580, 13 July 2018).

The initial desk study identified potential on-site sources of contamination that comprised a tramway and bus garage, scrap yard, potential infilled land/Made Ground. Furthermore, potential off-site sources were also established, and these included railway land, a sewage works and a potential infilled reservoir. These sources were judged to have the potential to pose a conceptual risk to human receptors including future Site users and construction workers. However, the risks to controlled water receptors, including the River Brent and the underlying chalk aquifer, were judged most likely to be low.

To provide a better understanding of the nature and extent of contamination beneath the Site, BHE implemented a Phase II investigation comprising exploratory hole formation, sample recovery, laboratory testing and environmental monitoring. From this assessment it was concluded that shallow soils could pose a risk to human health due to the presence of contaminants including asbestos. Elevated concentrations of hazardous ground gases were also detected, and these were judged to have the potential to impact any future development.

6.2.3 Legislation & Planning Policy Context

The assessments and content of the ES will be produced in accordance with the technical guidance set out within the following documents:

- Environmental Protection Act 1990 Part IIA; and
- Land Contamination Risk Management (LCRM, 2023).

6.2.4 Characteristic of Potential Effects

Potential impacts are generally associated with the possible presence of contamination on the site and the potential for cross-contamination of the ground and impacts upon controlled waters including groundwater and surface water bodies.

Geotechnically, consideration would need to be given to whether a proposed basement structure could result in ground instability with the potential to impact adjacent off-site structures. Furthermore, it would need to be established if the formation of deep piled foundations could result in the creation of preferential migration pathways which could exacerbate risks to sensitive aquifers beneath the Site.

EHO indicate that a comprehensive unexploded ordnance (UXO) survey has yet to be completed and that this is likely to be required prior to large scale earthworks.

6.2.5 Study Area

The study area primarily comprises the application Site itself, with on-site receptors are likely to be future site users, construction workers, proposed structures and associated buried services. Potential off-site receptors, including surface water bodies and occupants of neighbouring properties, will also be considered in the event that plausible exposure pathways are established.

6.2.6 Assessment Methodology

The current best practice for the assessment of potentially contaminated sites as stipulated by LCRM states that all assessments should be carried out in a tiered approach commencing with an initial Phase I desk study that utilises information relevant to the current and historical uses of the Site and its surroundings, and whether these could give risk to a potentially significant contamination with the potential to impact human, environmental and built receptors.

LCRM details the following steps for each stage of risk assessment:

1. *"Identify the hazard – establish contaminant sources.*
2. *Assess the hazard – use a source-pathway-receptor (S-P-R) linkage approach to find out if there is the potential for unacceptable risk.*
3. *Estimate the risk – predict what degree of harm or pollution might result and how likely it is to occur by using the tiered approach to risk assessment.*
4. *Evaluate the risk – decide whether a risk is unacceptable".*

This approach involves consideration of site-specific S-P-R linkages where:

- A source represents a contaminant or pollutant that is "*in, on or under the land and that has the potential to cause harm or pollution*";
- A pathway (or exposure pathway) is a "*route by which a receptor is or could be affected by a contaminant"*; and
- A receptor is "*something that could be adversely affected by a contaminant, for example a person, controlled waters, an organism, an ecosystem, buildings, crops or animals*".

6.2.7 Indicative Mitigation Measures

The aforementioned BHE Phase II report indicated that remediation measures would need to be implemented to ameliorate the risk posed to identified receptors from the identified sources of contamination. These included:

- Excavation and off-site disposal of areas of significant impact as and where required;
- Construction of a cover system of 'clean' soils to in future garden/soft landscaped areas to sever direct contact pathways;
- The incorporation of ground gas protection measures into the construction of new buildings;
- Adoption of control measures during construction to prevent the generation of asbestos impacted dusts; and
- Use of appropriate materials for buried structures and services, in particular potable water supply pipework.

6.3 Noise & Vibration

6.3.1 Introduction

The Site is adjacent to the A406 road, the A404 road, and an adjacent railway line. Consequently, it is considered that noise and vibration from the surrounding transport network may result in effects upon future receptors at the site. These effects will require assessment.

Furthermore, the effects of noise and vibration from the Development upon adjacent receptors, both during construction and operation, will need to be presented in the ES Chapter.

The following key noise issues will be addressed:

- The effect of the external noise climate on the Development;
- The effect of the external vibration levels on the Development;
- The effect of construction noise and vibration on the nearest sensitive receptors to the Site.
- The effect of any noise generating aspects (fixed plant, on-site traffic movements) of the Development on the nearest sensitive receptors to the Site.

6.3.2 Existing Environment (Baseline)

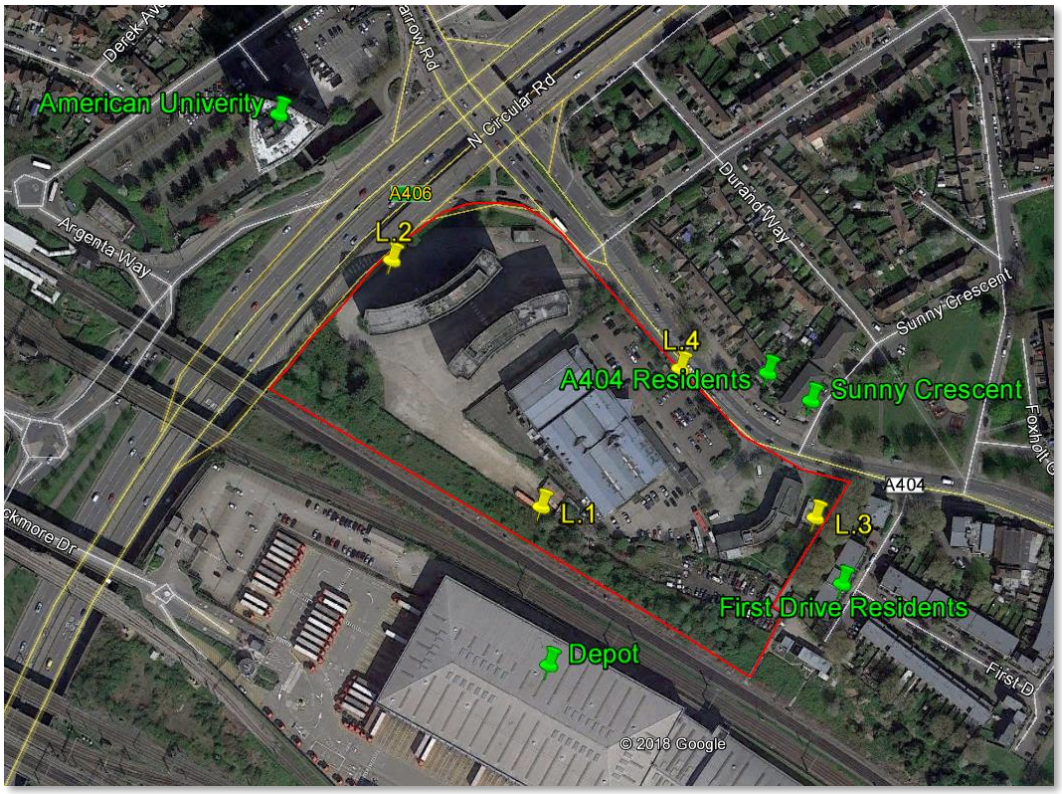
A series of baseline noise and vibration measurements within the existing site boundary at the following locations was undertaken in 2018 and again in 2021 to provide a further review post the influence of Covid 19. (**See Figure 16**):

- Location 1 – on the southern boundary of the site, adjacent to the railway line (noise and vibration).
- Location 2 – on the north-western boundary of the site, adjacent to the A406 (noise only).
- Location 3 – on the eastern boundary of the site, adjacent to First Drive (noise only).
- Location 4 – on the north-eastern boundary of the site, adjacent to the A404 (noise only).

It is also considered that these locations would be representative of the nearest noise-sensitive receptors to the site, namely:

- Location 1 – the Depot to the south.
- Location 2 –the University building to the north-west.
- Location 3 – First Drive Residents to the east.
- Location 4 – A404 and Sunny Drive Residents to the north-east.

Figure 13 Monitoring Locations and Nearest Receptors



Sound level meters and a seismograph were be installed to measure over a 96-hour period including a weekend.

The baseline survey was part-attended by a member of SLR's Acoustics Team to verify that the measured levels are representative of the various noise and vibration sources in the area.

6.3.3 Legislation & Planning Policy Context

6.3.3.1 National Planning Policy

Relevant sections of the following policy documents will be referred to in the ES:

- The National Planning Policy Framework (NPPF) December 2023.
- Planning Practice Guidance (PPG) June 2021.
- Noise Policy Statement for England (NPSE) March 2010.

6.3.3.2 Local Planning Policy

Relevant sections of the following policy document are detailed below:

- London Plan (2021).

6.3.3.3 London Plan (March 2021)

*"**Policy D14** of the London Plan requires consideration of noise as follows:*

Noise

A In order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by:

1) avoiding significant adverse noise impacts on health and quality of life

2) reflecting the Agent of Change principle as set out in Policy D13 Agent of Change

3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses

4) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity."

6.3.3.4 Brent Local Plan (2022)

As a general theme, where mentioned in the Local Plan it is stated that new residential developments should incorporate in the design and layout protection against noise.

Relevant sections of a number of policies are listed below:

Policy H5 Housing Design:

At section iii states that:

"An acceptable level of noise insulation being achieved by means of sensitive design, layout and in developments vulnerable to transportation noise and vibration".

Policy DHI Design:

"Developments should consider acceptable noise insulation and attenuation."

6.3.4 British Standards & Guidelines

Relevant sections of the following British Standard and guideline documents will be detailed in the ES.

The phase of assessment that the document would be referenced in are indicated.

Significance of Effect for all phases:

- Guidelines for Environmental Noise Impact Assessment, produced by the Institute of Environmental Management and Assessment (IEAM), and published in October 2014.

Demolition and Construction Phase:

- BS5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise.

Operational Phase:

- BS8233:2014 Guidance on sound insulation and noise reduction for buildings.
- BS6472:2008 Guide to evaluation of human exposure to vibration in buildings Part 1: Vibration sources other than blasting.
- BS4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound.
- ProPG: This Professional Practice Guidance on Planning and Noise (ProPG) Residential

- Approved Document O to the Building Regulations 'Overheating'.

6.3.5 Characteristics of Potential Effects

Generic noise effects are detailed in **Table 17** of the Guidelines for Environmental Noise Impact Assessment. Where an adverse impact is identified the Guidelines present the following generic relationship between noise impact and noise effect:

- Negligible [or no] Impact Noise Effect: *"Noise impacts can be heard, but do not cause any change in behaviour or attitude, e.g. turning up volume on television; speaking more loudly; closing windows. Can slightly affect the character of the area but not such that there is perceived change in the quality of life";*

- Minor Impact Noise Effect: *"Noise impact can be heard and causes small changes in behaviour and/ or attitude, e.g. turning up volume of television; speaking more loudly; closing windows. Potential for non-awakening sleep disturbance. Affects the character of the area such that there is a perceived change in the quality of life";*

- Moderate Impact Noise Effect: *"Causes a material change in behaviour and/or attitude, e.g. voiding certain activities during periods of intrusion. Potential for sleep disturbance resulting in difficulty getting to sleep, premature awakening and difficulty in getting back to sleep. Quality of life diminished due to change in character of the area"; and*

- Major Impact Noise Effect: *"Significant changes in behaviour and/or inability to mitigate effect of noise leading to psychological stress or physiological effects e.g. regular sleep deprivation/awakening; loss of appetite, significant, medically definable harm, e.g. auditory and non-auditory".*

6.3.6 Study Area

The Study Area is defined in front chapters above.

6.3.7 Assessment Methodology

6.3.7.1 Identification & Appraisal of Receptors

The Receptors and area that will be assessed are detailed in Section 6.3.2 and are shown in Figure 17 above.

6.3.7.2 Sensitivity

The sensitivity of the receiving environment together with the magnitude of impact defines the level of effect as shown in **Table 13.**

Table 13 Level of Effect Matrix

Magnitude	Sensitivity			
	Very High	High	Medium	Low
Major	Major	Major	Major	Moderate
Moderate	Major	Moderate	Moderate	Minor
Minor	Moderate	Minor	Minor	None
None	None	None	None	None

6.3.7.3 Magnitude of Change - Demolition/Construction Phase Noise Impact

The impact of demolition and construction noise upon residential receptors will be determined with reference to the ABC method presented in BS5228-1:2009+A1:2014. In accordance with this method the threshold noise levels for a potentially significant effect are as detailed in **Table 14**.

Table 14 Construction Noise Residential Receptors – Example Threshold Values

Assessment category and threshold value period (L_{Aeq})	Threshold value, in decibels (dB)		
	Category A A)	Category B B)	Category C C)
Night-time (23.00-07.00)	45	50	55
Evenings and weekends D)	55	60	65
Daytime (07.00-19.00) and Saturdays (07.00-13.00)	65	70	75
NOTE1 A significant effect has been deemed to occur if the total LAeq noise level, including construction, exceeds the threshold level for the Category appropriate to the ambient noise level. NOTE 2 If the ambient noise level exceeds the threshold values given in the table (i.e. the ambient noise level is higher than the above values), then a significant effect is deemed to occur if the total LAeq noise level for the period increases by more than 3 dB due to construction activity. NOTE 3 Applied to residential receptors only.			
A) Category A: threshold values to use when ambient noise levels (when rounded to the nearest 5 dB) are less than these values. B) Category B: threshold values to use when the ambient noise levels (when rounded to the nearest 5 dB) are the same as category A values. C) Category C: threshold values to use when the ambient noise levels (when rounded to the nearest 5 dB) are higher than category A values. D) 19.01-23.00 weekdays, 13.01-23.00 Saturdays and 07.01-23.00 Sundays.			

The impact of construction noise upon residential receptors will be determined with reference to BS5228:2009+A1:2014.

The impact of construction noise upon residential receptors is as detailed in **Table 15**.

Table 15 Construction Noise – Impact Magnitude

Magnitude	Increase in the $L_{Aeq,T}$ Noise Level
Major	Threshold value exceeded by more than 5dB
Moderate	Threshold value exceeded between 3.0 and 4.9dB
Minor	Threshold value exceeded between 0.1 and 2.9dB
None	Threshold value not exceeded

6.3.7.4 Magnitude of Change - Operational Phase Noise Impact

For the residential element to the proposed development the assessment will utilise baseline noise data into a noise model, which would include the Outline Zoning of the Proposed Development to calculate noise levels across the Site.

The predicted noise levels in the proposed residential zones would be assessed in accordance with the ProPG, and the external and internal limits specified in BS8223:2014., and any other guidance specified by the Local Authority.

The results of the assessment would be used to advise the design of the scheme and to derive any mitigation measures considered necessary. These may include, but would not necessarily be limited to, recommendations for glazing units, the erection of acoustic barriers, or changes in the proposed layout to ensure that the internal noise levels accord with the intended use.

With regards to the requirements of Approved Document O, where overheating may be identified, facades would be identified where internal night-time noise limits could not be met with an open window.

Based on the guidance presented in the ProPG. BS8233:2014 and ADO the impact of environmental noise upon proposed receptors during the daytime is detailed in **Table 16**.

Table 16 Magnitude of Impact – Environmental Noise Daytime (External)

Magnitude	$L_{Aeq,T}$ Daytime Noise Level dB
Major	More than 55.0
Moderate	52.6 – 55.0
Minor	51.1 – 52.5
Negligible	50.0 – 51.0
None	Less than 50.0

Based on the guidance presented in ProPG, ADO and BS8233:2014 the impact of environmental noise upon proposed receptors during the night-time is detailed in **Table 17**, effects of which will be defined as per the guidance standards outlined and appropriate mitigation put forward.

Table 17 Magnitude of Impact – Environmental Noise Night-Time (External)

Magnitude	$L_{Aeq,T}$ Night-Time Noise Level dB
Major	More than 50.0
Moderate	48.0 – 49.9
Minor	46.1 – 47.9
Negligible	45.0 – 46.0
None	Less than 45

6.3.7.5 Suitability of the Site for a Residential Development – British Standard 6472:2008

The impact of vibration upon proposed residential receptors will be determined with reference to BS6472:2008.

Based on the guidance presented in BS6472:2008 the impact of vibration upon proposed residential receptors during the daytime is detailed in **Table 18**. The impact at night is detailed in **Table 19**.

Table 18 Vibration Upon Residential Receptors Daytime – Impact Magnitude

Magnitude	VDV $ms^{-1.75}$
Major	0.8 or more
Moderate	0.4 – 0.79
Minor	0.2 - 0.39
None	Less than 0.2

Table 19 Vibration Upon Residential Receptors Night-Time – Impact Magnitude

Magnitude	VDV $ms^{-1.75}$
Major	0.4 or more
Moderate	0.2 – 0.39
Minor	0.1 - 0.19
None	0

6.3.7.6 Impact of Development Related Commercial/industrial Sound – BS4142:2014+A1:2019

The impact of operational commercial/industrial sound upon residential receptors will be determined with reference to BS4142:2014+A1:2019. In accordance with BS4142:2014+A1:2019:

- Typically, the greater the difference between the rating level and the background sound level the greater the magnitude of the impact.

- A difference of around +10dB or more is likely to be an indication of a significant adverse impact, depending on the context;
- A difference of around +5dB is likely to be an indication of an adverse impact, depending on the context; and
- The lower the rating level is relative to the measured background sound level, the less likely it is that the specific sound source will have an adverse impact or a significant adverse impact. It is an indication that the specific sound source has a low impact when the rating level does not exceed the background sound level, depending on the context.

Based on the above the impact of operational noise upon residential receptors is as detailed in **Table 20**.

Table 20 Operational Noise Residential Receptors – Impact Magnitude

Magnitude	Description
Major	Rating level is 10dB(A) or more above the background
Moderate	Rating level is between 6 and 9dB(A) above the background
Minor	Rating level is between 1 and 5dB(A) above the background
None	Rating level is between 0 and 10dB(A) or more below the background

Consideration will also need to be given to existing commercial and industrial operations upon the site and implications resulting with respect to the introduction of the “Agent of Change” principle in policy D13 as well as where referenced in national policy within the NPPF, where sources are not related to entertainment, and are predominantly commercial or industrial BS4142 is the appropriate standard, significant adverse impacts on the proposed development should be avoided to in turn ensure that likelihood of “valid complaint” is mitigated which otherwise may impact continued operation of existing commercial and industrial businesses in the surround.

6.3.8 Assessment of Effects

6.3.8.1 Construction Phase

An assessment of construction noise and vibration will be undertaken at the nearest noise and vibration-sensitive receptors to the Site. The levels will be predicted using the guidance contained in British Standard 5228:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise and Part 2 – Vibration.

An assessment of the potential noise effects of construction related traffic movements will also be included within the assessment.

Any mitigation measures considered necessary would be suggested to protect the amenity of the residents of the nearby noise and vibration-sensitive properties.

6.3.8.2 Operational Phase

Effect Upon Proposed Development

Baseline noise data will be input into a noise model, which would include the Masterplan layout of the Development to calculate noise levels across the Site.

The predicted levels will be assessed in accordance with the National Planning Policy Framework (NPPF) and in particular the external and internal limits specified in BS8223:2014, Guidance on sound insulation and noise reduction for buildings, and any other guidance specified by the Local Authority.

The results of the assessment will be used to advise the design of the Development and to derive any mitigation measures considered necessary. These may include, but would not necessarily be limited to, recommendations for glazing units, the erection of acoustic barriers, or changes in the proposed site layout to ensure that the internal noise levels accord with the intended use.

The measured vibration levels generated by locomotives utilising the railway line to the south of the site will be assessed against the guidance contained in British Standard 6472:2008 Guide to Evaluation of human exposure to vibration in buildings Part 1: Vibration sources other than blasting.

The results of the vibration assessment will be used to advise the design of the Development, and to derive any mitigation measures that are deemed necessary. These may include, but would not necessarily be limited to, the use of anti-vibration mounts or layers of it is determined that the internal vibration dose values exceed the criteria of 'Low probability of adverse comment' as defined BS6472:2008.

Effect of Proposed Development

The sound levels generated by any plant associated with the Development (i.e. noise from air conditioning/extraction units associated with the hotel and commercial elements of the development) would be predicted at the nearest noise-sensitive locations using the proprietary software-based noise model, CadnaA, which implements the full range of UK calculation methods.

The measured background sound levels will then be compared to the plant rating levels and assessed in accordance with BS4142:2014+A1:2019 *Methods for rating and assessing industrial and commercial sound*, which would also incorporate the observations made by the surveyor regarding the context of each location, to determine if fixed plant at the site is likely to give rise to adverse impacts at the nearest residential properties.

A subjective opinion of the fixed plant acoustic features will also be included within the assessment; this may include penalties for tonal, impulsive, and intermittent aspects of the noise being generated by the plant.

The assessment would indicate whether mitigation measures are required to reduce any identified impacts; the scope of this study includes consideration of generic mitigation measures but does not include detailed design of such measures.

6.3.9 Potential Effects Not Requiring Further Assessment

At this stage it is considered that an assessment of Development related off-site traffic would not be required. It is unlikely that the development would lead to a sufficient percentage increase in off-site traffic flows for an increase in traffic noise to be perceptible, this is subject to agreement at consultation.

6.4 Air Quality

6.4.1 Introduction

With respect to air quality, the proposed development has the potential to cause likely significant effects on local air quality as a result of construction and operational activities. Furthermore, the Site needs to be appropriately evaluated to ensure the suitability for its proposed use and future sensitive occupants.

The scope of the proposed assessment methodology is based upon local and national guidance and planning policy – as-well as established best practice. Details of the proposed assessment methodology are discussed with supporting justifications.

6.4.2 Existing Environment (Baseline)

A review of baseline air quality conditions within proximity of the Site will be undertaken with reference to the latest available air quality data in the public domain.

Monitoring data collected during the COVID-19 pandemic (i.e. 2020 and 2021) will not be used to characterise the baseline environment, as pollutant concentrations monitored during this period are expected to be atypical, and not representative of the local environment.

Baseline air quality sources proposed to be utilised include:

- London Local Air Quality Management (LLAQM) Air Quality Annual Status Reports (ASR);
- London Atmospheric Emissions Inventory 2019 (LAEI);
- Automatic Urban Monitoring Network (AURN); and
- Department for Environment Food and Rural Affairs (Defra) 1km background mapped concentration estimates (2018 base year).

From an initial review, there appears to be air quality monitoring undertaken within the vicinity of the Site suitable for the purposes of characterising baseline conditions. The nearest (BRT 43) is located <550m from the Site, along the A406 North Circular Road. Annual mean NO_2 concentrations recorded at BRT 43 between 2015-2019 have been above the Air Quality Assessment Level (AQAL) of 40µg/m^3.

Existing monitoring will be used for the purposes of informing baseline conditions, supplemented with other datasets covering the study area (e.g. LAEI, Defra 1km background maps). Supplementary monitoring is therefore not considered necessary. The suitability of these publicly available datasets will be reviewed throughout the EIA lifecycle and following receipt of project design information (e.g. road traffic movements), in conjunction with statutory consultees.

The Site is located within an Air Quality Management Area (AQMA). The Brent AQMA was declared in 2006 due to exceedances of the NO_2 annual mean and PM_{10} 24-hour mean AQALs at locations of relevant exposure. Furthermore, the Site borders an Air Quality Focus Area (AQFA), established by the Greater London Authority (GLA) covering the A406 North Circular (Stonebridge Park to Gresham Road).

6.4.3 Legislation & Planning Policy Context

The following legislation will be considered within the assessment:

- Air Quality Standards Regulations 2010 (AQSR);
- Air Quality Strategy 2007 (AQS); and

- Environment Act 1995.

The AQS provides the over-arching strategic framework for air quality management in the UK and contains national air quality standards and objectives established by the UK Government and Devolved Administrations for the protection of public health and the environment.

The AQS objectives apply at locations where members of the public are regularly present and might reasonably be expected to be exposed to pollutant concentrations over the relevant averaging period – herein referred to as relevant exposure. Box 1.1 within the Mayor of London's LLLAQM Technical Guidance 2019 (LLAQM.TG (19)) provides an indication of those locations.

The ambient air quality standards of relevance to human receptors in this assessment (collectively termed AQALs) are provided in **Table 21.**

Table 21 Relevant Ambient AQALs

Pollutant	AQAL ($\mu g/m^3$)	Averaging Period
Nitrogen Dioxide (NO_2)	40	Annual mean
	200	1-hour mean (not to be exceeded on more than 18 occasions per annum)
Particles (PM_{10})	40	Annual mean
	50	24-hour mean (not to be exceeded on more than 35 occasions per annum)
Particles ($PM_{2.5}$)	25	Annual mean

The following planning policies will be considered within the assessment:

- National Planning Policy Framework (NPPF) 2023;
- Planning Practice Guidance (PPG);
- London Plan 2021; and
- Brent Local Plan 2022.

6.4.4 Characteristics of Potential Effects

6.4.4.1 Construction Phase

Construction activities have the potential to cause the following likely significant effects:

- Effects associated with dust generated from construction activities with respect to:
  - Annoyance due to dust soiling;
  - The risk of health effects due to an increase in exposure to PM_{10}, and
  - Harm to ecological receptors.

6.4.4.2 Operational Phase

Operational activities have the potential to cause the following likely significant effects:

- Public health effects associated with an increase in pollutant concentrations from additional traffic flows generated by the proposed development; and

- Health effects associated with the exposure of future sensitive occupants to elevated pollutant concentrations.

6.4.5 Study Area

6.4.5.1 Construction Dust Assessment

For the purposes of defining the study area in relation to dust/PM_{10} generated from proposed construction activities on sensitive receptor locations, the following guidance documents will be used:

- Mayor of London's: 'Supplementary Planning Guidance (SPG): The control of dust and emissions from construction and demolition' (GLA, 2014); and
- Institute of Air Quality Management (IAQM): 'Guidance on the Assessment of Dust from Demolition and Construction' (IAQM, 2016).

This involves the consideration of:

- Human receptors within 350m of any proposed construction works, and within 50m of routes used by construction vehicles on the public highway, up to 500m from the Site's exit(s); and
- Ecological receptors within 50m of any proposed construction works, and within 50m of routes used by construction vehicles on the public highway, up to 500m from the Site's exit(s).

6.4.5.2 Operational Phase Road Traffic Dispersion Modelling Assessment

With respect to existing sensitive human receptors, the spatial extent of the study area for the operational phase road traffic dispersion modelling assessment will be initially defined using a series of screening criteria as presented in the Environmental Protection UK (EPUK) and IAQM guidance document 'Land-Use Planning and Development Control: Planning for Air Quality' (EPUK & IAQM, 2017). These thresholds will be used to determine the extent of the affected road network. The criteria that will be applied as part of this assessment relates to increases in development-generated traffic. Traffic data used for the purposes of the assessment will be consistent with the analysis undertaken and presented as part of Chapter 15: Traffic and Transport. Worst-case sensitive human receptors (of relevant exposure) within 200m of the affected road network will be considered, as per the Design Manual for Roads and Bridges (DMRB) LA 105 (Highways England, 2019).

With respect to new sensitive human receptors (i.e. those introduced by the proposed development – future sensitive occupants), worst case human receptors at locations of relevant exposure across the site will be considered. Road links surrounding the site will be considered.

To minimise uncertainty associated with the dispersion modelling outcomes, a verification exercise will be undertaken utilising the latest representative monitoring data collected by Brent Council (BC) (the latest year which has not been impacted by the COVID-19 pandemic).

6.4.6 Assessment Methodology

6.4.6.1 Construction Dust Assessment

Potential dust impacts arising from construction activities would be assessed qualitatively using the approach defined in the Mayor of London's SPG (GLA, 2014). This approach is based on the IAQM's construction dust guidance (IAQM, 2016).

The IAQM methodology provide a framework to establish the unmitigated risk of construction dust impacts associated with a development at both human and ecological receptors. The likely unmitigated dust emission magnitude associated with four activities (demolition, earthworks, construction and trackout) is initially defined and used in conjunction with the sensitivity of the surrounding area to determine the risk of impact for each activity. Following determination of these risks, proportionate mitigation is recommended, with the aim of rendering residual effects as not significant.

Significance is only assigned to the effect after considering the construction activity with mitigation. This is because for construction activities, the aim is to prevent significant effects on receptors through the use of effective mitigation. The IAQM construction guidance therefore does not provide a framework to determine the significance of unmitigated effects, as is not considered appropriate nor relevant in this context. For these reasons, the significance of the unmitigated effect of construction dust cannot be defined.

6.4.6.2 Operational Phase Road Traffic Dispersion Modelling Assessment

Given the sensitivity of the surrounding area and scale of development, a detailed assessment of operational road traffic emissions will be undertaken using dispersion modelling. This will consider potential changes in air quality concentrations at existing sensitive receptors locations as a result of vehicle movements generated by the proposed development, as well as likely concentrations future occupants may be exposed to for the purposes of evaluating the suitability of the site.

ADMS Roads v5.0 detailed dispersion model will be used, focusing on concentrations of nitrogen dioxide (NO_2) and particulate matter (PM_{10} and $PM_{2.5}$) (the pollutants of principal concern arising from road traffic) for the following scenarios:

- Baseline / verification assessment (2019 or 2022 (if fully ratified and published) – baseline vehicle movements;
- Do Minimum (DM) – Future baseline vehicle movements (inclusive of any relevant committed developments) for the assumed year of opening; and
- Do Something (DS) – Future baseline vehicle movements (inclusive of any relevant committed developments) for the assumed year of opening, plus all vehicle movements associated with the proposed development.

Due consideration will be given to phasing within the dispersion modelling exercise, to ensure impacts across the construction lifespan are appropriately accounted for – if relevant.

Road traffic emissions will be sourced from the latest version of the Emission Factor Toolkit (EFT) (currently v11.0) published by Defra. Background concentrations will be sourced from the latest release of Defra background concentration estimates (currently 2018-reference year) provided at a 1km grid square resolution across the UK or local monitoring (if relevant). This will ensure other localised emission sources are appropriately accounted for within the dispersion modelling exercise.

The railway line located directly to the south of the Site is not specified as being heavily trafficked with diesel passenger trains within Defra's LAQM.TG (22) requiring further assessment. As such, detailed consideration of the impact of emissions from moving locomotives has been scoped out of this assessment. Emission concentration contributions are believed to be suitably accounted for following application of a representative background dataset.

The technical approach to the assessment would be accordance with the Mayor of London's Technical Guidance LLAQM.TG (19) and supplanted by Defra's version (LAQM.TG (22)). Significance criteria provided with the Environmental Protection UK (EPUK) and IAQM Land-

Use Planning & Development Control: Planning for Air Quality guidance document will be used.

For the assessment of existing receptors, the resultant total concentration as well as the magnitude of change in relation to each respective AQAL are both considered. Pollutant concentrations predicted at new receptors locations introduced by the proposed development will be compared against the relevant AQALs to determine the suitability of the site, and whether any mitigation/design amendments to the scheme are required, to minimise exposure.

6.4.6.3 Air Quality Neutral Assessment

An Air Quality Neutral (AQN) calculation will be undertaken in accordance with the GLA's 'Air Quality Neutral London Plan Guidance' (2023) to identify the development's overall emission contribution relative to published benchmarks – and whether further mitigation is required. These benchmarks will define the maximum allowable emissions of NO_x and particulate matter based on the size and use class of the proposed development. The assessment will consider transport and building emissions (where relevant).

6.4.6.4 Air Quality Positive Statement

An Air Quality Positive (AQP) statement will be prepared in accordance with the GLA's 'Air Quality Positive London Plan Guidance' (2023) to demonstrate that air quality has been a principal consideration throughout the design of the proposed development. This will include how the design has considered ways to maximise benefits to local air quality and what measures or design features have been adopted to minimise exposure to pollution.

The statement will consider measures under the following themes:

- Better design and reducing exposure;
- Building emissions (if applicable);
- Transport emissions; and
- Innovation and futureproofing.

6.4.7 Potential Effects Not Requiring Further Assessment

6.4.7.1 Construction Phase Road Traffic Emissions

Given the short-term nature of the construction phase and the comparatively low volume of vehicle movements that will likely arise (when compared to the operational phase), potential impacts are not likely to exceed the worst-case criteria proposed to be assessed for the operational phase and are likely to be lesser in comparison. Furthermore, construction phase impacts are considered to be temporary leading to no long-term deterioration of conditions.

Effects associated with road traffic emissions generated by construction activities are likely to be insignificant and no further assessment is required.

6.4.7.2 Construction Phase Machinery Emissions

According to the IAQM's construction guidance (IAQM, 2016), experience of assessing exhaust emissions from NRMM suggests that they are unlikely to make a significant impact on local air quality. Furthermore, in accordance with Defra's LAQM.TG (22) (Defra, 2022), providing suitable controls are applied, emissions generated from NRMM are unlikely to contribute to a significant impact upon local air quality. These measures will be detailed

within the ES Chapter. Construction phase impacts are temporary leading to no long-term deterioration of conditions.

Non-road mobile machinery used for the construction phase emissions will comply with the relevant emission standards. The Site is located outside of London's Low Emission Zone for NRMM; therefore, all machinery (37kW to 560kW) will meet the following emission standards:

- Current: Stage IIIB;
- From the 1st of January 2025: Stage IV;
- From the 1st of January 2030: Stage V; and
- From the 1st of January 2040: zero emissions.

Consistent with advice provided by the IAQM and Defra, it is initially proposed to scope out impacts associated with emissions generated from NRMM used within the construction phase on the basis that suitable controls will be applied.

6.4.7.3 Operational Combustion Emissions (Heating and/or Power)

Details regarding the heat and energy strategy are not fully clarified, or whether the proposed development will include combined heat and power (CHP) units and/or boilers).

The latest Energy Assessment Guidance prepared by the GLA (GLA, 2022) provides a heating hierarchy development should adhere to. Preference is to connect to a local existing or planning heat network or use zero emissions sources initially, with low emission CHP and/or boilers as less favourable options.

Therefore, an assessment of combustion emissions assessment is not presently required. This will be reviewed/clarified following receipt of design information throughout the EIA lifecycle and confirmed with statutory consultees.

6.5 Ecology & Biodiversity

6.5.1 Introduction

The Ecology chapter will identify the key biodiversity and ecological resources within the footprint of the Development and surrounding zone of potential indirect impact, the importance of those resources, and the potential effects of the Development on those resources. These will form the basis of assessment on the significance of effects. Where mitigation is included as part of the design, or embedded, the significance of the residual effects will take this into account.

Detailed assessment will be undertaken on any resources that have the potential to be significantly affected and require additional mitigation and compensation measures to be applied.

The assessment will draw on the conclusions from other disciplines, notably landscape, and cumulative impacts will also be assessed.

6.5.2 Study Area

The assessment work will be focused on the Site. A 1km buffer zone around the footprint of the Development will be considered as part of the desk-based study to identify any sites designated for nature conservation, and for any protected or notable species previously recorded.

A desk-based search will be extended for ecological sites subject to international (Ramsar) or European designations, Special Areas of Conservation (SAC) and Special Protection Areas (SPA) within 2km, and for any such sites that may be hydrologically linked. This is to determine whether a Habitat Regulations Assessment will be required.

A search will not be undertaken for SACs designated for bat conservation within a 30km area, as the application site is located within the Greater London area. As such, the application site is not considered to be relevant to migrating bats and therefore such an extended search is not considered necessary.

6.5.3 Assessment Methodology

A review of the policies pertinent to the site with regards to nature conservation has been undertaken. Whilst there are no specific policies for the site, policies relevant to biodiversity that would be considered comprise the National Planning Policy Framework (paragraphs 109 and 118 in regards to the enhancement of the natural environment and the conservation of biodiversity); and the London Plan 2021 policy G1 to G7 covers impacts to green infrastructure and the natural environment where a development may directly, indirectly or cumulatively affect a site with nature conservation value.

Existing biological data has been procured through a biological records request from the Local Biological Records Centre, Greenspace Information for Greater London (GIGL)[8] to identify any on site ecological designations for the purpose of determining the sensitivity of the location and the characteristics of the potential impact.

No sites subject to statutory designation are located within 2km of the Site.

13no. non-statutory designated sites for ecology occur within the 1km of the application site. These comprise the following Sites of Importance for Nature Conservation (SINC):

[8] GiGL (4th Dec 23) An Ecological Data Search for Brentfield Road On behalf of SLR Consulting. Report reference 24590

- London's Canals M006;
- Brent River Park, Wembley BrBIO5;
- Dudding Hill Loop between Cricklewood and Harlesden BrBI06C;
- Harlesden to Wembley Central railsides, including the Wembley Brook BrBI06D;
- Canal Feeder BrBII01;
- Abbey Road Mound and Bestway Park BrBII07;
- River Brent west of Stonebridge BrBII18;
- River Brent at Hanger Lane EaBII22;
- Brentfield Open Space and Leicester Road BrL05;
- The Old Orchard BrL09;
- Oakington Manor Primary School Wood BrL26;
- Heather Park Drive embankment BrL30; and
- Wembley Hill Sports and Social Club BrL33.

Of these 13 SINCs, one lies adjacent to the site (Harlesden to Wembley Central rail sides). This connects with the Canal Feeder SINC at the eastern end. Due to the connectivity and proximity of these SINCs to the proposed development, these would be considered as part of the ecological assessment.

The other 11 SINCs are not ecologically connected to the application site and are at a sufficient distance from the site that there would be no impacts to the ecological integrity of the sites. Therefore, these would not be considered as part of the assessment.

The desk study included a search for ponds and ditches within 500m of the development site in order to assess any present for potential to support great crested newts (Triturus cristatus). No suitable waterbodies were identified, therefore great crested newts have been scoped out for the purpose of assessment.

The biological records provided by GIGL identified the following notable or protected species/ species groups within 1km of the application site:

- Various flowering plants, including dittander (*Lepidium latifolium*);
- A wide range of moths;
- Common frog (*Rana temporaria*) and Slow worm (*Anguis fragilis*);
- Various bird species including passerines, waterfowl and raptors;
- West European hedgehog (*Erinaceus europaeus*); and
- Bats, including Daubenton's bat (*Myotis daubentonii*); common pipistrelle (*Pipistrellus pipistrellus*) and soprano pipistrelle (*Pipistrellus pygmaeus*).
- Stag Beetle (*Lucanus cervus*).

A habitat survey was undertaken on 27th May 2016 and subsequently updated on 21st June 2017 and updated on the 13th November 2023. No habitats or botanical species of high intrinsic importance were observed during the visit; therefore, no further habitat assessment or invertebrate surveys would be undertaken. The discovery of stag beetle in proximity to the site in 2021 is not considered a cause for concern due to the site's poor suitability for this species which requires dead wood for its life cycle, something that is absent from the site.

It was observed that a number of buildings that could be used by bats as roosting sites. The buildings were assessed for bat roost potential to determine an appropriate level of survey effort to determine presence/ likely absence. Dusk emergence and dawn re-entry surveys were undertaken of buildings over the course of 2017 to identify any roosting sites associated with the buildings. One survey visit was undertaken at buildings with low potential and two visits undertaken at buildings with moderate roost potential, with visits separated by at least two weeks and comprising one dusk and one dawn survey each. A repeat building assessment was undertaken on 13th November 2023 which did not identify any evidence that would indicate the presence of roosting bats, the buildings remaining a mixture of low and moderate suitability. **Update presence absence surveys for bats have been recommended for 2024.**

The trees on site were also inspected for bat roost suitability and were confirmed as being of low potential to support roosting bats, indicating they are likely to be used opportunistically by individual bats and not support a regular roost. These trees would need to be felled following a sensitive felling protocol but do not require further surveys at this time.

Static automated survey was undertaken in September 2017 to identify levels of bat activity and species present. This was repeated in April 2018 to provide additional data. The surveys identified only occasional bat passes and no roosting sites were confirmed. **Updated automated static surveys are proposed for 2024.**

The habitats on site had some suitability to support breeding birds. Two survey visits were undertaken in 2017 to identify evidence of breeding birds and signs of breeding on site. Signs of black redstart (*Phoenicurus ochruros*) in particular were looked for. No black redstarts or signs of black redstart territorial activity were recorded on site during the surveys. Five other bird species, considered to be of conservation concern, were recorded; however, none were confirmed to have used the site to breed or were likely to have used the site to breed. The habitat is deemed unsuitable for birds; therefore, this element will be scoped out.

The habitat within the application site was considered to have potential to support reptiles. A presence/likely absence survey was undertaken in 2017, with a peak count of two slow worms observed.

No evidence of badger (*Meles meles*) or other terrestrial mammal activity was observed on site during the survey visits, and no signs of mammal nests or burrows were observed.

In summary, habitats, plants, invertebrates, amphibians (including GCN) and mammals (except bats) were scoped out from further assessment. The following detailed surveys completed up to 2016 but now require updating:

- Reptile presence/ likely absence survey.
- Bat roost and automated bat activity surveys.

Technical reports would be provided for each of the species-specific surveys and included within the Technical Appendices to the Ecology Chapter.

We have assumed that quantitative assessment of biodiversity impacts, as typically required for projects requiring biodiversity offsetting or seeking to meet “biodiversity net gain”, would not be required at the scoping stage. This would be completed at a later stage as may be required.

The ecological surveys and assessment will be undertaken in accordance with current industry practice[9].

Importance will be assigned to ecological receptors based on:

- The citations of designated sites; and
- Prevalence and distribution of biological records in respect of conservation status and geographical range and previous surveys and assessment.

Evaluation of importance may be revised following consultation and further investigation.

6.5.4 Potential Effects

Ecological resources identified within the study area that may be adversely impacted by potential effects of the proposed works will be identified as potential ecological receptors. Where any likely effects can be avoided or mitigated through the project design, mitigation would be considered as embedded, and the potential receptor scoped out for the purpose of detailed assessment. Any potential receptors considered to have potential to be significantly affected and require additional mitigation or compensation will be subject to detailed assessment.

6.5.5 Potential Mitigation

The Development would result in both permanent and temporary loss of habitat within the footprint of the works; disturbance during construction due to construction noise and dust, and during operation due to the presence of people inhabiting the site and external lighting.

Ecological surveys undertaken on site have identified presence of reptiles, nesting birds, and low levels of bat activity. Mitigation for reptiles and nesting birds would be undertaken where required and in accordance with current industry guidelines. Ecological enhancements would be recommended to ensure a net gain in biodiversity.

[9] Chartered Institute of Ecology and Environment Management Guidelines for Ecological Impact Assessment in the UK and Ireland (Second Edition, 2016)

6.6 Traffic & Transport

6.6.1 Introduction

A detailed Transport Assessment (TA) will be prepared to support the planning application, subject to agreement on its scope with LB Brent and TfL. The TA will be appended to the ES Chapter and forms the basis of the transport-related input for consistency.

An assessment will be undertaken of the likely significant effects of the proposed development on the environment with respect to transport and access, considering both the construction and operational phases of the development.

6.6.2 Existing Environment (Baseline)

The site is located on land to the south of the A404 Harrow Road / A406 North Circular grade separated junction. The A406 North Circular is a Red Route and forms part of the Transport for London Road Network (TLRN).

The existing pedestrian infrastructure in the vicinity of the site is of good standard and provides access to a range of local amenities, education, and public transport options. The A404 benefits from wide, well-lit footways on both sides of the carriageway.

There are a range of local amenities situated within a short distance of the site such as Stonebridge Primary School, Our Lady of Lourdes Catholic Primary School, Hazeldene Medical Centre and a range of retail facilities located north and east of the site adjacent to the A404.

It is also noteworthy that LB Brent, in conjunction with TfL and GLA, are currently working up plans for a new cycleway on the A404, including the section along the site frontage. This will form part of TfL's Healthy Streets improvements between Wembley and Willesden. This 5km route would be north-west London's first major cycle route, connecting Wembley, Stonebridge Park, and Willesden Junction. Future sections will connect to planned infrastructure in west London such as CS9 and CS10. This planned new cycleway is fully incorporated into the access strategy of the proposed development.

The nearest bus stops to the site are the 'North Circular Road' bus stops located on the eastern frontage of the site on the A404. Bus stop 'K' provides access to north-bound bus services (18 / N18) towards Sudbury at a typical daytime frequency of every 5 minutes. South-bound services (towards Euston) are accessible bus stop 'J'. Both bus stops benefit from timetable information, real time information screens, shelters, seating areas and signage. Additional bus services - 112 and 440 - are accessible within 300 metres of the site from bus stops on North Circular Road.

The nearest railway station to the site is Stonebridge Park, located approximately 400 metres (a 5-minute walk) west of the site. The station can be accessed via the A404 and North Circular Road along a network of continuous footways and pedestrian crossing facilities.

Public Transport Accessibility Level (PTAL) provides a guide to the relative accessibility of an area by public transport. PTAL scores range from 1 to 6b, where 6b is the highest score and 1 the lowest. The Site falls completed within PTAL rating 3, as such this Site could be considered to have a 'Good' / 'Moderate' level of public transport accessibility.

6.6.3 Legislation & Planning Policy Context

Consideration in the preparation of the supporting transport material will be given to the following pertinent policy and guidance documents (not an exhaustive list):

The National Planning Policy Framework (NPPF) broadly covers all aspects of planning policy and the extracts below detail those relevant to this site and transport.

Paragraph 110 outlines the basic transport requirements for developments to provide, and states that "*In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*

- *Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- *Safe and suitable access to the site can be achieved for all users; and*
- *Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."*

Of further note, Paragraph 111 outlines that "*development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe*."

With regards to accessible developments, Paragraph 112 highlights that *"applications for development should:*

- *Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
- *Address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- *Create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- *Allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
- *Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.*"

Paragraph 113 states that "all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed."

The **London Plan** is the Spatial Development Strategy for Greater London, setting out a framework for how London will develop and the Mayor's vision for Good Growth.

Development proposals should take a strategic approach to transport to make the 'most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes.' Proposals should ensure that any impact on the transport network and / or its supporting infrastructure are mitigated.

Policy T2 'Healthy Streets' confirms that new development should deliver patterns of land use that facilitate residents making short, regular trips by walking and cycling in order to reduce health inequalities, car dependency and ownership, road danger, severance, emissions and noise. Development proposals should identify opportunities to improve the balance of space given to utilise active modes of transport, public transport and essential vehicle trips.

Policy T4 relates to the assessment and mitigation of transport impacts, stating the requirement for Transport Assessment to be submitted with development proposals to ensure that the impacts are fully assessed at a local, network-wide and strategic level.

Car parking standards are also defined within Chapter 10 of the London Plan which should be applied to new development following its formal adoption. Policy T6 confirms that car-free development should be the starting point for all proposals in places that are well-connected by public transport.

Reference will also be given to local policy and guidance adopted by LB Brent where relevant.

6.6.4 Characteristics of Potential Effects

6.6.4.1 Construction Phase

An Outline Construction Logistics Plan will be prepared to support the planning submission. This report provides a framework to manage construction vehicle and operational activities and mitigate against the residual impacts on the local highway network and immediate areas to the site.

6.6.4.2 Operational Phase

Details and assessments from the supporting TA will outline the likely level of trips to be generated by the proposed development via a variety of modes which will be agreed as part of the transport scoping discussions with LB Brent and TfL. The following reports will also be prepared to support the planning submission, detailing the potential effects and mitigative measures that would be implemented:

- Framework Travel Plan
- Delivery & Servicing Management Plan
- Car Parking Management Plan

6.6.5 Study Area

The extent of transport impact will be determined using pre-defined significance criteria for each mode of travel. Those criteria will be based on the net change in journeys as a result of the development of the site and any infrastructure improvements delivered as part of proposals. The significance criteria will establish the magnitude of any beneficial or adverse effects the proposed development will have on the transport network.

The scope of the assessment will be agreed with LB Brent and Transport for London (TfL).

6.6.6 Assessment Methodology

The ES chapter will summarise the results from the TA in accordance with the requirements of the EIA regulations and current best practice for undertaking EIA traffic and transport assessments.

6.6.6.1 Identification and Appraisal of Receptors

The potential receptors are those people making journeys within the relevant study area for each mode:

- Pedestrians
- Cyclists

- Public transport users; and
- Road users

The following assessment criteria will be utilised for the construction and operational phases:

- Driver severance and delay;
- Pedestrian/ cyclist severance and delay;
- Pedestrian/ cyclist amenity;
- Accidents and safety;
- Hazardous and dangerous loads; and
- Dust and dirt (albeit, this will be assessed within the Air Quality chapter of the ES).

Effects will be compared to baseline conditions to assess the impact of the proposed development. Mitigation will then be proposed as necessary, and the impact re-assessed to indicate the overall impact of the development on these indicators.

6.6.6.2 Sensitivity & Magnitude

The extent of transport impact will be determined using pre-defined significance criteria for each mode of travel. Those criteria will be based on the net change in journeys as a result of the development of the site and any infrastructure improvements delivered as part of proposals. The significance criteria will establish the magnitude of any beneficial or adverse effects the proposed development will have on the transport network. For each effect to be assessed, receptors are identified in each study area. The sensitivity of receptors for the transport effects will be defined as shown in **Table 22 below**.

Table 22 Sensitivity of Receptors for Transport Effects

Effect Sensitivity	Description
Negligible	Receptors which are very lightly used (by all users or particularly by vulnerable road users) relative to other receptors within the study area or those which have a very high capacity to accommodate change without significant effects arising.
Low	Receptors which are lightly used (by all users or particularly by vulnerable road users) relative to other receptors within the study area or those which have a high capacity to accommodate change without significant effects arising.
Moderate	Receptors which are used (by all users or particularly by vulnerable road users) to an average level relative to other receptors within the study area or those which have a moderate capacity to accommodate change without significant effects arising.
High	Receptors which are heavily used (by all users or particularly by vulnerable road users) relative to other receptors within the study area or those which have a low capacity to accommodate change without significant effects arising.

6.6.6.3 Assessment of Effects

The assessment will address the potential for the following effects with regard to traffic and transport:

- Short- or medium-term disturbance to receptors arising from the demolition and construction works and associated traffic including an assessment of vehicle trips, movements and safety during the demolition and construction works period.
- Changes to the flows of traffic on the local highway network when the Proposed Development is operational and any consequential effects on driver delay or highway safety.
- Change in the demand arising from the completed Proposed Development on public transport services.
- Effects on pedestrian and cycling journeys, accessibility, and facilities.
- Effects on pedestrians in terms of severance, delay, amenity, fear and intimidation.

The TA will be prepared with consideration of relevant planning policies and guidance, including the Healthy Streets approach as adopted by TfL.

A trip generation assessment will be provided for the respective elements of the proposed development, with a comparison against the existing baseline conditions and lawful use of the site to establish the net impact of the proposals in these terms. The scope of these assessments and other relevant details will be agreed separately through the transport scoping process.

The ES will define a baseline scenario for the opening year for the Proposed Development (without the Development, 'Do Nothing' scenario) which will take into consideration of other surrounding Committed Development schemes (to be agreed with LB Brent and TfL during the transport scoping discussions). Following this, consideration will be given to any effects of the Proposed Development in this context (i.e., the 'with Development' scenario). This therefore results in a 'cumulative' worst case assessment.

The assessment will cover the following topics:

- A review of national, regional and local policy guidance;
- A review of the existing transport conditions including highway operations and safety, parking, servicing, access, public transport, walking and cycling provision;
- A description of the proposed development in terms of the provision of transport related facilities (including car / cycle parking, access arrangements, delivery and servicing arrangements etc.);
- A trip generation assessment to estimate the demand for transport generated by the proposed development by all main modes of transport (vehicle, pedestrians, cyclists, public transport by type). This will be based on information in the TRICS database and survey data; and
- Assessment of the impact of the proposed development demand on the highway, public transport, walking and cycling networks in terms of the likely effects and significance.

6.7 Wind Engineering

6.7.1 Introduction

SLR's specialist Wind Engineering team has been engaged to assess the wind microclimate impact of the proposed Bridge Park development. The assessment will incorporate the following elements:

- Regional and local wind characteristics at the site (prevailing wind directions and wind speed magnitude).
- Target wind safety and comfort levels.
- The likely "Future" wind environment with the addition of the proposed development on pedestrians and users of the development itself – this includes the likely changes to the existing, "Baseline", wind environment at the site.
- The "Future" wind environment for the ongoing "Operational" stage of the project, as well as the (transient) "Construction" stage.
- Mitigation recommendations to enable compliance with the target wind safety and comfort levels.

Given the height of the taller buildings within the proposed development, the development will be subject to quantitative assessment (via detailed Wind Tunnel Testing) to confirm the above predictions and mitigation outcomes.

6.7.2 Scope & Issues - Summary

The Wind Microclimate ES chapter will consider potential environmental impacts from the wind environment, assessing the impacts for both future occupants of the proposed development as well as ground level pedestrians in the surrounds.

6.7.3 Existing Environment (Baseline)

General Wind Characteristics of the Greater London Region

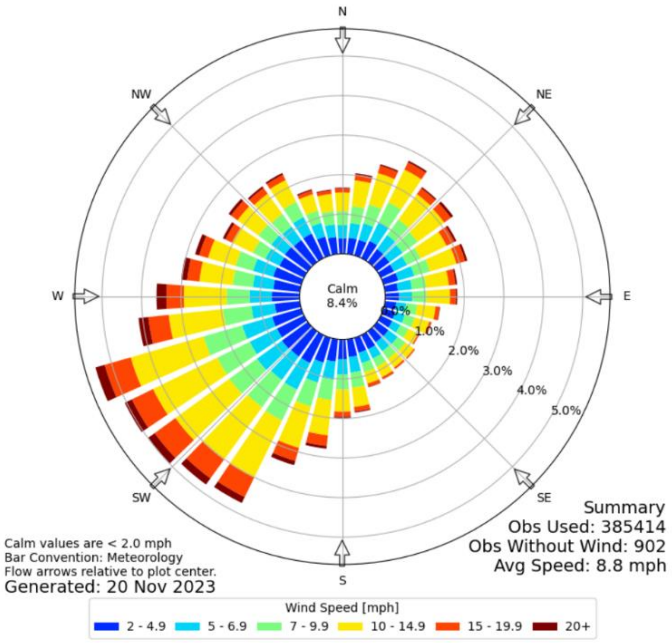
The Greater London Region experiences wind conditions influenced largely by North Atlantic depressions and continental weather patterns, the latter occurring mainly in spring.

- When North Atlantic depressions pass by the UK, the wind appears initially to come from the southwest quadrant and then the west to northwest as they move away. By the time northwest winds are occurring, such depressions have typically weakened. Northwest winds also have to pass over more land and hence experience greater surface friction, which reduces their magnitude even further close to the ground.
- As a result, the southwest quadrant winds accompanying these low-pressure weather systems are generally stronger than associated northwest quadrant winds. North Atlantic depressions are often accompanied by cloud and rain.
- Continental weather patterns can produce cold spells in winter as well as hot, humid weather in summer. High pressure systems that strengthen over Scandinavia produce a secondary, occasionally strong, prevailing wind in the Greater London area from the northeast.
- Finally, coastal areas in southern England experience onshore sea breezes from late spring through the summer, which can reach London, originating from easterly quadrants.

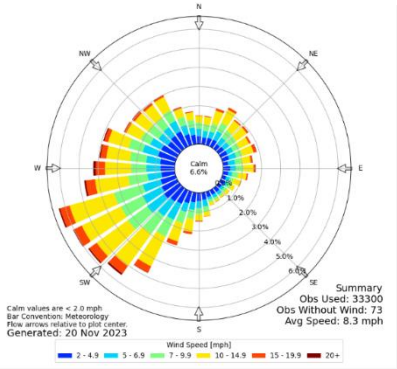
Figure 17 shows the annual wind rose and three representative monthly wind roses for the nearest airport meteorological station, Northolt RAF, located just over 9 km west of the site. Northolt RAF is located in reasonably flat topography with surrounding “suburban” type terrain, similar to the Site.

Figure 14 Wind Roses from Closest Airport Met Station (Northolt RAF)

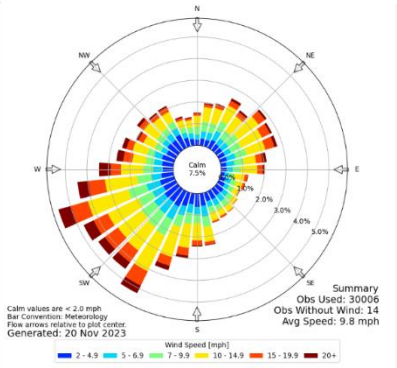
Annual



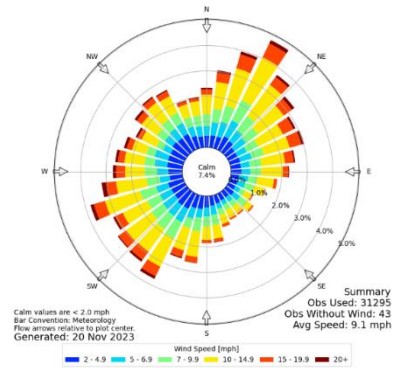
July (Summer)



February (Winter)



April (Spring)



- Summer and Autumn months (May-November) are dominated by winds from the southwest quadrant, with a modest increase in winds from the south east in Autumn compared to Summer;
- Winter (December-February) months are completely dominated by strong winds from the south west;
- The Spring months of March and April mark a transition in the seasonal patterns with a relatively significant contribution of (generally mild) winds from the northeast quadrant.

Local Wind Environment

Close to the ground, the “regional” wind patterns described above are affected by the local terrain and topography.

Immediate Near-Field

- The 21-storey Wembley Point building lies to the northwest of the site on the west side of the A406. The Princess Royal Distribution Centre lies to the south and southwest. In all other directions, the site is surrounded by low-rise residential buildings.

Far-Field

- From the west-southwest clockwise around to the east are low-rise residential areas, interspersed with gardens and parklands. Wembley Stadium and the Wembley Park precinct are located approximately 1.5 km to the north-northwest.
- From the southeast clockwise around to the southwest is the Park Royal precinct featuring a range of commercial and light industrial buildings as well as Central Middlesex Hospital and other medium-rise buildings.

Baseline Wind Conditions at Project Site

Southwest (SW) Quadrant Winds

- In terms of the far-field, the lack of significant height buildings upstream currently provides minimal sheltering to southwest winds. This will change with the addition of the Grand Union development south of the railway tracks and west of the A406. Ground level areas in the immediate vicinity of the site do receive some sheltering from the elevated sections of roadways, rail line and Princess Royal Distribution Centre to the south and southwest.
- Finally, the existing UNISYS buildings at the western end of the site have downstream wind impacts on the south side footpath of the A104 in the vicinity of these buildings for SW winds.

As a result, existing street level wind conditions in the vicinity of the project site are likely to approach the comfort criteria assigned to the Project, with the exception of winds close to the existing UNISYS buildings where footpath wind levels on the south side footpath of the A104 close to these buildings may be at the relevant comfort criteria.

Northeast (NE) Quadrant Winds

- There are currently no significant height buildings upstream of the site to the northeast. Stronger winds from this direction however are less frequent than from the southwest. Finally, there is potential for channelling of northeast winds along upstream side streets, in particular Conduit Way and to a lesser extent Sunny Crescent.

As a result, existing street level wind conditions in the vicinity of the project site are likely to be below the comfort criteria assigned to the Project, with the exception of winds on the south side footpath of the A104 opposite Conduit Way, which may be close to the relevant comfort criteria.

Upper-Level Winds

Due to the low-rise surrounding built environment in all prevailing wind directions, winds at higher elevations are likely to impact the site with minimal sheltering. Winds from the southwest in particular are expected to be strong, especially in winter.

6.7.4 Legislation & Planning Policy Context

The relevant regulatory documents for the assessment of environmental wind effects are:

- Brent Design Guide SPD1 2018; Brent Tall Building Strategy 2019 and Brent Local Plan 2022.
- London Plan 2021 and City of London *Wind Microclimate Guidelines* for Developments in the City of London 2019.
- National Planning Policy Framework (NPPF).

Qualitative Policy Guidance

With the exception of the City of London's *Wind Microclimate Guidelines*, guidance in relation to environmental winds is largely qualitative.

For example, Brent Tall Buildings Strategy 2019 contains the following extracts related to environmental winds:

- *The comfort and safety implications associated with wind should be evaluated for all tall buildings and those significantly taller than their surroundings.*
- *Tall buildings need to demonstrate how they can minimise negative environmental impacts such as wind and how they provide balcony or other amenity spaces at higher elevations that are comfortable to use despite higher wind speeds.*
- *Tall buildings should demonstrate early in the design process that they will not compromise amenity and enjoyment of the public realm, including streets, open spaces, waterways, and private outdoor space and dwellings (new and existing) and that they will avoid negative effects of wind.*

Quantitative Policy Guidance

The City of London's *Wind Microclimate Guidelines for Developments in the City of London* (2019) provides specific advice covering the assessment of environmental winds and target wind objectives covering both comfort and safety.

Wind Objectives – Sensitivity Criteria

The *Wind Microclimate Guidelines* use a modified (and slightly more stringent) version of the so-called Lawson Criteria, previously adopted by the LDDC (London Docklands Development Commission) and used on numerous London (and the wider United Kingdom) major building developments.

- The "Comfort" criteria relate typical pedestrian activities such as walking, sitting, etc., to the local "GEM" wind speed which has an annual exceedance of 5% – refer **Table 23**.
- The "Safety" criterion covers instances when pedestrians might encounter difficulty in walking. They are defined by the incidence of "GEM" wind speeds occurring once or twice per year (annual exceedance of 0.022%), i.e. during the most intense windstorm of the year – refer **Table 24**.

The "GEM" (Gust Equivalent Mean) wind speed referred to above, is the maximum of the local mean wind speed or the local gust speed divided by 1.85.

The Wind Microclimate ES chapter will adopt the *Wind Microclimate Guidelines* criteria provided in **Table 23** and **Table 24** as the basis for assessing the future wind impact of the proposed development.

Table 23 Wind Comfort Criteria

"C" Category	GEM 5% Annual Exceedance	Description
C1 Frequent Sitting	2.5 m/s	Acceptable for frequent outdoor siting use e.g. at a restaurant, café, etc.
C2 Occasional Sitting	4 m/s	Acceptable for occasional outdoor seating e.g. public outdoor spaces, balconies and terraces intended for occasional use, etc.
C3 Standing	6 m/s	Acceptable for entrances, bus stops, covered walkways or passageways beneath buildings.
C4 Walking	8 m/s	Acceptable for external pavements, walkways.
CX Uncomfortable	> 8 m/s	Not comfortable for regular pedestrian use.

Table 24 Wind Safety Criterion

"S" Category	GEM 0.022% Annual Exceedance	Description
SX Pedestrian Safety Limit	15 m/s	Presents a safety risk for pedestrians, especially to more vulnerable members of the public.

Magnitude of Change (Impact)

The magnitude of change (Impact) for wind microclimate is unlike that utilised by other specialist disciplines. This is principally due to the nature of the assessment, where the development is unlikely to change the existing local wind environment in itself, but may change how the wind microclimate effects the "future receptors" identified (i.e. locations within the development proposed for walking, sitting, standing, etc).

As such, the sensitivity of a receptor and the associated magnitude of change (impact) are inter-related within the assessment and cannot be separated out to create a level of effect matrix. Notwithstanding, the Significance of Effects section below details how any likely impacts of the proposed development upon wind microclimate area are assessed.

Significance of Effects

The significance of effect in the assessment of wind impact at locations within and surrounding the Site is based on comparing the likely wind conditions at any particular location with the target usage at the same location (e.g. sitting, strolling, leisure walking, etc) as defined by the criteria detailed in **Table 23** and **Table 24**.

- The proposed development is deemed to have a **"Beneficial"** impact at any particular location if wind conditions are calmer than the levels associated with the target usage at that location.
- The proposed development is deemed to have an **"Unfavourable"** impact at any particular location if wind conditions are higher than the levels associated with the target usage at that location.
- When wind conditions at any particular location, with the addition of the proposed development, are close to the levels associated with the target usage at that location, the impact is termed **"Negligible"**.

The Significance of Effect criteria are shown in **Table 25**.

All “Unfavourable” impacts (whether minor, moderate or major) are considered to be “significant”, requiring consideration of mitigation for local conditions to become suitable for the intended use of the area. In considering mitigation under these such circumstances, “Baseline” wind conditions should be considered if pre-existing conditions are already exceeding the target wind levels at the project site.

Table 25 Significance of Effect Related to Adopted Sensitivity Criteria

Magnitude	Expected Wind Microclimate
Beneficial – Major	Wind Conditions are 3-levels calmer than desired
Beneficial – Moderate	Wind Conditions are 2-levels calmer than desired
Beneficial – Minor	Wind Conditions are 1-level calmer than desired
Negligible	Wind Conditions are at the same level as desired
Unfavourable – Minor	Wind Conditions are 1-level windier than desired
Unfavourable – Moderate	Wind Conditions are 2-levels windier than desired
Unfavourable – Major	Wind Conditions are 3-levels windier than desired OR Wind Conditions exceed: . the 5% “Uncomfortable” category or . the 0.022% “Safety Limit” category

6.7.5 Assessment Methodology

The assessment methodology used in this study involves the following steps:

- The regional and local wind climate relevant to the site will be assessed in detail. This will yield the prevailing wind directions and their seasonality and the strong wind directions with the potential to cause elevated wind speeds at user locations.
- Usage areas of interest throughout and surrounding the site will be defined: pedestrian footpaths surrounding the site, internal areas designated for amenity-based activities (strolling, sitting, etc.), building entry points, rooftop gardens, etc.
- The development will be subject to quantitative assessment via detailed Wind Tunnel Testing to confirm both baseline wind conditions and future wind conditions with the addition of the proposed development.
- A scaled model of the proposed development as well as the surrounds encompassing a diameter of approximately 1 km will be built for testing.
- The wind levels predicted via the wind tunnel testing will be compared to the sensitivity criteria adopted for the Project.
- Where impacts have the potential to be “Unfavourable”, mitigation options are developed for review by the Project Team in terms of practicality, sustainability, aesthetics, etc.
- Recommended wind mitigation options will be tested to demonstrate their efficacy.

Construction Phase Impacts

A review will be undertaken of any significant wind impacts during the construction phase of the Project.

Cumulative Impacts

The potential for relevant committed development proposals in close vicinity to the site to give rise to significant cumulative impacts to the wind microclimate environment will be assessed.

Mitigation

As noted above, where the assessment indicates that there could be a significant impact resulting from the wind microclimate as a result of the development proposal, mitigation and management measures to control the impacts will be implemented to ameliorate potentially adverse conditions.

The ES chapter will identify adverse wind locations, confirming the effectiveness of any recommended windbreak mitigation options and demonstrating compliance with relevant approval conditions.

6.8 Daylight, Sunlight, & Overshadowing

6.8.1 Introduction

Given the scale and design of the Proposed Development, along with its proximity to potentially sensitive receptors, a daylight, sunlight, overshadowing and solar glare assessment is considered necessary and will therefore be scoped into the EIA.

The assessment will consider the likely significant effects of the Proposed Development on daylight and sunlight at existing and future surrounding residential properties and overshadowing at amenity areas to the north of the Proposed Development.

The daylight, sunlight and overshadowing technical assessment will be carried out by GIA.

Light intrusion assessments have been scoped out of the EIA, as discussed in the 'Topics to be scoped out' section.

Internal daylight and sunlight to the new residential units and overshadowing to the new open space associated with the Proposed Development will be assessed separately and presented as a standalone planning application report.

6.8.2 Existing Environment (Baseline)

The Site is Bounded on the north by Brentfield Road, the east by residential units, south by railway tracks and the west by the North Circular Road. The Site is occupied by the Bridge Park Community Leisure Centre, the vacant Unisys buildings, offices, a nursery and religious venue and car parking.

The existing baseline scenario of the surrounding area will be established following a review of the land uses in proximity of the Site, with reference to information available via the Valuation Office Agency ('VOA') website (i.e. council tax records). This approach allows for the identification of potentially sensitive receptors within sufficient proximity to the site and which have a reasonable expectation of natural light, as well as existing outdoor amenity areas as defined with British Research Establishment (BRE) Guidelines.

To determine the existing baseline conditions, the daylight and sunlight levels within each of the relevant existing sensitive receptors will be defined using the Vertical Sky Component (VSC), No-Sky Line (NSL) and Annual Probable Sunlight Hours (APSH) methods, in line with the BRE Guidelines, regional and local planning policies.

Any relevant existing surrounding outdoor amenity areas with the potential to be overshadowed by the Proposed Development will be identified by visual observation aided by Google Maps. Transient Overshadowing and Sun Hours on Ground (where relevant) methodologies will be used to determine the overshadowing baseline conditions.

In the baseline condition, the neighbouring receptors are likely to enjoy high levels of daylight and sunlight. This is due to the existing Site being predominantly low rise.

6.8.3 Legislation & Planning Policy Context

The daylight, sunlight and overshadowing assessments will be conducted in accordance with the principles set out in the following policies and guidance.

National

- National Planning Policy Framework 2023; and
- National Planning Practice Guidance.

Regional

- The London Plan March 2021

Local

- Brent Local Plan (Adopted 2022)
- Brent SPD Residential Amenity Space & Place Quality

Guidance

- BRE Guidelines 2022; and
- CIE Collection on Glare (2002).

6.8.4 Characteristics of Potential Effects

6.8.4.1 Construction Phase

Owing to the evolving and changing nature of the demolition and construction activities, the assessment of potential effects during the demolition and construction of the proposed Development on daylight, sunlight, overshadowing and solar glare to the surrounding sensitive receptors will not be modelled and analysed. This is due to the effects in relation to daylight, sunlight, overshadowing and solar glare varying throughout the demolition and construction stage. Instead, a qualitative assessment will be undertaken using professional judgement, with the worst-case scenario in terms of the effects quantitatively modelled and analysed through the assessment of the completed Proposed Development (see below for further details)

6.8.4.2 Operational Phase

Once the Proposed Development is complete, due to its scale and proximity to sensitive receptors, effects related to daylight, sunlight, overshadowing, and glare are likely to be observed for nearby receptors compared to the existing Site conditions. The potential effects would result from:

- Permanent changes to the daylight and sunlight amenity currently received by surrounding receptors, which have a reasonable expectation of natural light, due to the complete and occupied Proposed Development;
- Permanent changes to overshadowing of surrounding outdoor amenity spaces because of the complete and occupied Proposed Development; and
- The potential for solar glare effects to surrounding roads and railway viewpoints because of the complete and occupied Proposed Development.

6.8.5 Study Area

The Site is located within an allocated area BSSA7: Bridge Park and Unisys Building (Brent Local Plan 2022), an area designated for tall buildings.

BRE Guidelines state that habitable rooms within surrounding residential properties that can expect to receive a reasonable amount of daylight should be assessed. As a rule of thumb, where the angle to the horizontal subtended by the new development at the level of the centre of the lowest window is more than 25°, assessment is necessary. Professional judgement to the geographic scope is also applied.

In relation to overshadowing, amenity areas which are likely to experience overshadowing from the Proposed Development are included in the scope. Therefore, rear gardens of adjoining dwellings will be considered.

Given the close proximity to the North Circular Road to the west and the railway serving Stonebridge Park Station to the south of the Site a Solar Glare assessments will be undertaken. Viewpoints along the surrounding roads and railways lines where the Proposed Development is visible within a 500m radius will therefore be considered for Solar Glare.

6.8.6 Assessment Methodology

6.8.6.1 Identification & Appraisal of Receptors

In terms of the daylight and sunlight receptors, the scope will focus on the adjoining residential properties. Given the proposed height of the Proposed Development, an initial screening exercise has been undertaken to indicate the extent daylight and sunlight impacts arising as a result of the Proposed Development to surrounding buildings.

This study area for neighbouring sensitive properties was determined using a 3D model of the Proposed Development and surrounding context, specialist software and the BRE Guidelines 'rule of thumb' that if the Proposed Development subtends more than 25^{o} from the lowest window of sensitive buildings, they are not likely to be significantly affected.

As per the BRE Guidelines, occupants of residential properties have a reasonable expectation of daylight and sunlight, specifically within rooms where daylight is required including living rooms, kitchens, and bedrooms. Therefore, habitable rooms within the study area will be assessed in relation to daylight and sunlight.

The BRE Guidelines consider that guidance may also be applied to any existing non-domestic building where occupants have a reasonable expectation to daylight and sunlight. As such, education buildings surrounding the site will be also assessed.

Daylight and Sunlight

Surrounding residential buildings are considered to be sensitive to changes in daylight and sunlight amenity throughout the demolition and construction works of the Development and once it is completed. Therefore, the following properties set out below will be assessed in relation to daylight and sunlight which include, but are not limited to properties along:

- Residential properties along Brentfield (A404);
- Residential properties along Conduit Way;
- Residential properties along Durand Way;
- Residential properties along First Dr; and
- Residential building Wembley Point.

Overshadowing

In terms of overshadowing, potentially sensitive receptors include public and private amenity areas within close proximity to the Site, along / at:

- Park and playground along Sunny Crescent;
- Backyard gardens within properties along Brentfield;
- Backyard gardens within properties along Conduit Way;
- Backyard gardens within properties along Durand Way;
- Backyard gardens within properties along First Drive.

Transient Overshadowing and/or Sun Hours on Ground methodologies will be used to determine the overshadowing baseline conditions.

Solar Glare

The viewpoints potentially sensitive to solar glare include the North Circular Road and train drivers arriving and departing Stonebridge Park Station. Other surrounding road junctions where road users' have a view of the Proposed Development will also be assessed.

6.8.6.2 Sensitivity

In terms of sensitivity, existing surrounding residential properties (i.e. receptors) are considered highly sensitive to daylight and sunlight levels, and specifically habitable rooms within the properties such as living rooms, kitchens, and bedrooms, in accordance with BRE Guidelines (2022).

Amenity areas assessed for overshadowing and road and rail viewpoints assessed for solar glare are also highly sensitive.

Therefore, all receptors within the daylight, sunlight, overshadowing and solar glare assessments will be of equal, high sensitivity.

6.8.6.3 Magnitude of Change

The magnitude of change will be defined by reference to the criteria set out in BRE Guidelines (2022), as well as professional judgement and industry best practice.

6.8.6.4 Assessment of Effects

Daylight and Sunlight

In line with the BRE Guidelines, both the Vertical Sky Component (VSC) and No Sky Line (NSL) assessments will be undertaken for the Proposed Development, for all properties identified above.

The sunlight amenity to the surrounding properties will be considered by reference to the Annual Probably Sunlight House (APSH) method for all receptors sensitive to sunlight impacts identified above. With shadows being cast in a northerly direction in the northern hemisphere, this assessment will consider those windows serving habitable rooms which face the site and are located within 90^{o} of due south.

The nature (beneficial or adverse), scale (negligible, minor, moderate or major) and ultimately the significance of daylight and sunlight amenity effects will be determined using professional judgement and by reference to Appendix I of the BRE Guidelines.

Based on professional judgement, environmental effects classed as significant in EIA terms would be those which fall within the moderate adverse or major adverse categories. Effects that are beneficial, negligible or minor adverse are not considered significant adverse environmental effects.

Overshadowing

Overshadowing effects in regard to the relevant existing surrounding outdoor amenity areas will be identified using transient shadow plots (TOS) and, for clearly defined areas that may be significantly affected, the sun hours on ground (SHOG) methodology may be utilised. The daylight, sunlight and overshadowing effects of the Proposed Development will be assessed against this baseline condition.

Initially, the overshadowing analysis on the surrounding areas of amenity space will be undertaken by reference to the TOS method of assessment.

For the TOS assessment, the path of shadow will be mapped for the Proposed Development on the following dates as suggested by the BRE Guidelines:

- 21 March (Spring Equinox);
- 21 June (Summer Solstice); and
- 21 December (Winter Solstice).

Depending on the outcome of this analysis the Sun Hours on Ground (SHOG) assessment may be required for any amenity areas that appear to be significantly impacted by the Proposed Development. The SHOG assessment considers the proportion of a designated amenity space which receives 2 hours of direct sunlight on 21 March.

The nature (beneficial or adverse), scale (negligible, minor, moderate or major) and ultimately the significance of overshadowing effects will be determined using professional judgement.

Based on professional judgement, environmental effects classed as significant in EIA terms would be those which fall within the moderate adverse or major adverse categories. Effects that are beneficial, negligible, or minor adverse are not considered significant adverse environmental effects.

Solar Glare

The solar glare assessment will be undertaken with reference to CIE Collection on Glare and professional judgement. The analysis will be undertaken with a 3D computer model constructed using specialist software, which will run a simulation of the sun's path throughout the year from the viewpoint of drivers at selected junctions or signals. The output will include the time of day and date that reflected solar glare would occur at each point. The approach will, however, also be guided by the policy and guidance set out in the NPPF, London Plan and Local Planning Policies.

The solar glare assessment will consider the effects of the Proposed Development in absolute terms and, therefore, the baseline conditions are not relevant for these assessments.

The Proposed Development is considered to represent the worst-case scenario, as the addition of cumulative schemes may serve to shield instances of solar reflection. Therefore, this assessment does not consider solar glare in the Cumulative scenario.

6.8.7 Potential Effects Not Requiring Further Assessment

The Proposed Development is not likely to generate the potential for light intrusion beyond the levels recommended in ILP Guidance at surrounding sensitive properties given its primarily residential nature. Therefore, light intrusion shall be 'scoped out' of the EIA.

Internal daylight and sunlight to the new residential units and overshadowing to the new open space associated with the Proposed Development will be assessed separately and presented as a standalone planning application document. Therefore, internal amenity shall be 'scoped out' of the EIA.

The BRE Guidance (2022) requires that the potential shading upon surrounding PV panels which could occur as a result of a new proposal are considered. This will be considered in a standalone report. Therefore, PV panels shall be 'scoped out' of the EIA.

6.9 Socio-Economics

The assessment of the potential socio- economic effects will include consideration of the following:

- Employment generated during the construction phase;
- Net employment generated within the new uses created on site by the occupation and operation of the proposed development;
- Housing delivery;
- Increased population;
- Demand for social infrastructure including schools, health, open space and play space;
- Delivery of new social infrastructure; and
- Spending impacts from increased residential population and new employees.

Other socio-economic issues that are intended to be scoped out of the assessment are discussed in section 18.7 below.

6.9.1 Existing Environment (Baseline)

The assessment of socio-economic baseline conditions and potential impacts will utilise a number of methodologies, data sources and assumptions, including the following:

- The socio-economic baseline will be established using:
    - 2021 Census Data;
    - Business Register and Employment Survey (BRES);
    - Indices of Multiple Deprivation (IMD);
    - NHS Choices data;
    - London Datastore;
    - Brent Council schools place planning data.
- An estimation and quantification of the population and child yield associated with the completed and operational development. The modelling methodology applied to estimate the proposed development's child yield will be based on the GLA Population Yield Calculator 2019[18] or other good practice methodology, in agreement with LBB.
- Operational employment impacts will be assessed using the HCA Employment Density Guide and Homes England standard job density for commercial floorspace;
- Estimates of spending by newly introduced residents will be calculated using the Office for National Statistics (ONS) average annual household expenditure on goods and local services;
- Local spending by those working on-site will be calculated based on a daily expenditure assumption;
- Current capacity in schools surrounding the site will be assessed based on information from Annual Schools Census data and Brent Council's published schools' places data;

  Availability of primary healthcare facilities in the local area will be assessed by using published National Health Service (NHS) data. This information will be compared

with the projected new population in the development to estimate the likely effect of the development on primary healthcare facilities. The Healthy Urban Development Unit (HUDU) benchmark of 1,800 registered patients per NHS General Practitioner (GP) will be used to assess existing GP capacity against demand arising from the proposed development; and

- Provision of open space and child play space will be assessed in line with local and / or London policy and guidance.

6.9.2 Legislation & Planning Policy Context

There is limited guidance available on undertaking assessment of socio-economic effects of development, but the following are relevant and will inform the assessment:

- Measuring the Economic Impact of an Intervention or Investment (Office for National Statistics, 2010);
- Relevant national standards such as those provided by Homes England;
- Green Book (HM Treasury, 2003, updated July 2011); and
- National Planning Policy Framework.

In addition to the local policy documents identified below, other relevant supplementary planning guidance such as the Mayor of London's Shaping Neighbourhoods: Play and Informal Recreation and other guidance and strategies for London such as the Health Commission's Better Health for London will also form part of the regional policy context.

6.9.2.1 Relevant Planning Policy

- The London Plan 2021
- Brent Local Plan (2022)

The Brent Local Plan (BLP) identifies the site as being within the South Place Area with Policy 'BSSA7: Bridge Park and Unisys Building' allocating the Site for a new leisure centre, hotel, office, residential and small-scale commercial community uses. The Site has been identified as a tall Buildings Zone, where higher density development is appropriate. The indicative capacity is stated as 505 dwellings.

6.9.3 Characteristics of Potential Effects

Housing

The proposed development seeks to contribute to meeting the need for new homes identified by the GLA London Plan and BLP and would be supported by the in-built employment and leisure uses within the Site; at the same time the development would build on, and establish, sustainable links to existing employment sites within the Borough and beyond.

The assessment of effects would therefore consider the contribution of the development to housing supply in LBB and the wider area, the contribution to health and wellbeing of residents and the economic effects resulting from the provision of new homes to support the existing employment base.

Employment

The assessment would consider the number and type of jobs likely to be created within the development; and the effect of new residents bringing increased expenditure into Brent creating further employment in the wider area.

In terms of permanent phase effects, permanent full-time equivalent job creation will be calculated using job density estimates based on standard guidance such as that published by HCA. These estimates can also be converted into additional local labour supply using local labour market information obtainable via the ONS (employment and activity rates).

The assessment will also consider construction phase effects on local employment and the supply chain. Although construction phase effects are by their very nature temporary, for largescale schemes such as this, these construction phase effects can be both sizeable and extend over a period of many months or years. The data used to estimate these jobs are based on ONS and construction industry data.

Healthcare

The adequacy of healthcare provision in the local area to cater for the increase in population would be assessed. We would also consider the project's contribution to the objectives of the LBB Health and Wellbeing Strategy which include health promotion and reducing inequalities.

Education

The extent to which the existing provision of education, particularly primary school, and nursery places within walking distance, will be considered. The assessment will include estimating the number of pre-school and school-age children likely to be introduced by the proposed development and how far young people and others will have to travel to nurseries, schools, and further education.

Open Space and Recreation

The assessment will consider:

- How residents will access existing open space and recreational facilities;
- The availability and provision of play space and recreational facilities on site and with the local area.

6.9.4 Study Area

Study Area

A two-tiered Study Area is proposed for the assessment comprising:

1 A Wider Study Area (WSA)
2 A Local Area of Influence (LAI).

Wider Study Area (WSA)

The WSA is the study area within which effects on economic and housing market conditions could occur. The WSA is required for certain receptor groups, such as supply chain businesses, the labour market, and housing demand because the majority of effects that could occur in relation to these receptors would be experienced by population and business centres over a relatively wide area. We propose that the WSA would focus on LBB.

Local Area of Influence (LAI)

The LAI would be primarily defined by a radius of up to 1km from the Site, which approximates to the catchment area for local services that may generally be used by residents, and socio-economic receptors including educational and recreational assets.

6.9.5 Assessment Methodology

There is no industry standard guidance for this assessment. The proposed method for assessment, based on experience on similar projects, is detailed below and will take into consideration any matters raised in this scoping exercise. The assessment will:

- Consider the social and economic policy context at the local, regional and national level;
- Review socio-economic and recreation baseline conditions within the relevant study areas;
- Assess the likely scale, scope, permanence and significance of identified effects;
- Recommend mitigation measures, where appropriate; and
- Assess cumulative effects of the scheme with other proposed schemes.

It is proposed that the assessment will consider construction (including demolition) and operational effects. Effects associated with the construction phase of the proposed development are considered to be temporary and short-term. Effects associated with the operational phase of the proposed development are considered to be long-term effects.

The assessment will use desk-based information sources to assess the likely effects, supplemented by consultation with relevant stakeholders if relevant, and professional judgement based on previous experience.

6.9.5.1 Identification & Appraisal of Receptors

The proposed development, through its residents and business occupiers, would have a direct effect on community infrastructure within the local area. A socio-economic assessment will comprise review of the effects of the proposed development on existing community services and infrastructure receptors within the LAI including schools' places, child play space, healthcare, and recreational provision. Any existing deficiencies in provision of facilities to meet the demands of the new residents and business occupiers are identified, together with any displacement effects on existing users. Receptors will be identified on a Plan of Socio- Economic Receptors.

6.9.5.2 Sensitivity

There are no published standards that define receptor sensitivity relating to socio-economic assessment. As a rule, the sensitivity of each receptor or receptor group is based on its importance or scale and the ability of the baseline to absorb or be influenced by the identified effects. For example, a receptor (such as primary schools or a public footpath) is considered less sensitive if there are alternatives with capacity within the relevant study area. In assigning receptor sensitivity, consideration has been given to the following:

- The importance of the receptor e.g., local, regional, national, international;
- The availability of comparable alternatives;
- The ease at which the resource could be replaced;
- The capacity of the resource to accommodate the identified impacts over a period of time;
- The level of usage and nature of users (e.g., sensitive groups such as people with disabilities).

6.9.5.3 Magnitude of Change

There are no published standards that define thresholds of magnitude for socio-economic impacts. To aid clear and robust identification of significant effects, specific and targeted criteria for defining the magnitude of impacts have been developed for this assessment based on professional experience on other similar projects. The following four levels of magnitude have been adopted using professional judgement: high; medium; low and negligible. These impacts can be beneficial, adverse, or neutral.

6.9.5.4 Assessment of Effects

The level of effect of an impact on socio-economic receptors is initially assessed by combining the magnitude of the impact and the sensitivity of the receptor. Where an effect is classified as Major, this is considered to represent a 'significant effect' in terms of the EIA Regulations.

Where an effect is classified as Moderate, this may be considered to represent a 'significant effect' but would be subject to professional judgement and interpretation, particularly where the sensitivity or impact magnitude levels are not clear or are borderline between categories or the impact is intermittent or of limited duration.

Impacts and effects can be beneficial, neutral, or adverse and these would be specified where applicable. It should be noted that significant effects need not be unacceptable or irreversible.

6.9.6 Potential Effects Not Requiring Further Assessment 'Scoped Out'

The EIA Regulations require the consideration of the potential effects on climate change and human health where significant effects are likely to occur. However, the relevance of such factors is proportionate to the nature and scale of the project being considered. The prevailing baseline environment is likely to experience variations in the future due to climate change. Where relevant to the proposed development, such as the potential to increase the risk of flooding, these matters are addressed elsewhere within the EIA. However, at a site-specific scale, these changes are unlikely to have a significant effect upon the socio-economic receptors. Therefore, potential effects related to climate change are not considered to be relevant to the assessment of socio-economics effects in this instance.

Despite the inclusion of a hotel within the proposed development, it is proposed that effects on the tourism and visitor economy are scoped out of the assessment as the Site is relatively remote from areas of high tourism interest within London and it is considered that local demand for hotel accommodation is a function of business use and occasional events in particular those connected with Wembley Stadium.

7.0 Environmental Issues to be 'Scoped Out'.

7.1 Flooding & Water Environment

7.1.1 Introduction

With respect to flooding and the water environment it is not considered that the proposed development has the potential to cause likely significant effects on local water courses or will increase flood risk because of construction or operational activities. A Flood Risk Assessment and Drainage Strategy will be submitted with the planning application, outlining specific measures to mitigate flood risk and control surface water run-off to predefined levels.

7.1.2 Existing Environment (Baseline)

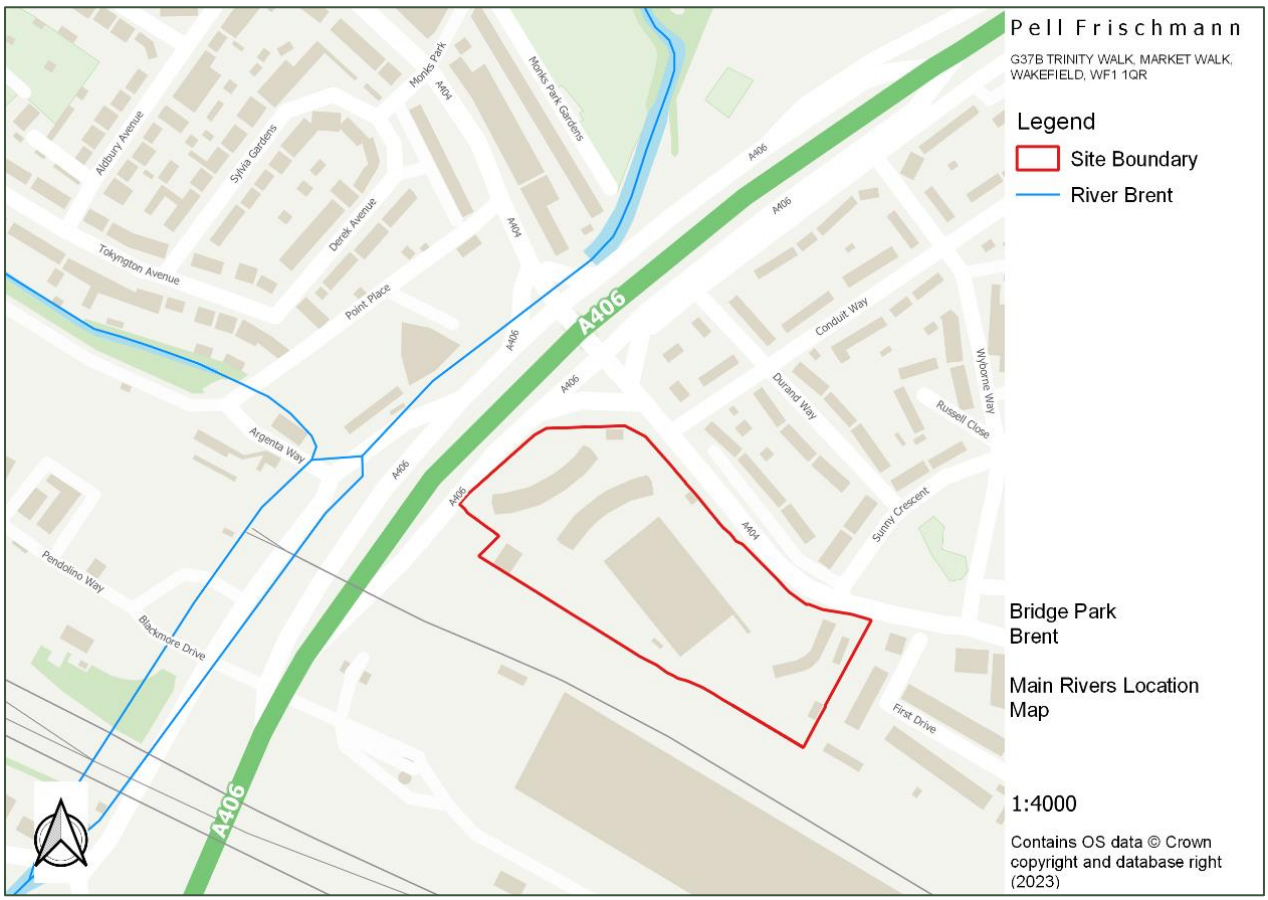
The Site is currently hard standing with a grassed area along the western boundary.

The River Brent is located 50m to the north and north west of the site in a part open, part culverted section of the watercourse. The site is spatially separated from the River Brent by the North Circular Road (A406) and Brentfield (A404 junction) (**Figure 18**).

The entire Site is situated below the Wealdstone Brook confluence and Brent Reservoir. The catchment is heavily urbanised apart from a 1km reach within Tokyngton Park and the final reach towards Greenford as the watercourse passes through Ealing Golf Club.

The Site is within the catchment of the Brent Feeder Canal Water Body, which is located within the Thames River Basin District Management Catchment.

Figure 15 Main Rivers Location Map



Flood risk – surface water

The Environment Agency's flood risk mapping shows the Site to be situated within Flood Zone 3. The Bridge Park site falls outside of the area that is protected by flood defences. As such, there is a 1 in 100 or greater annual probability of river flooding, or land having a 1 in 200 or greater probability of sea flooding annually.

Flood risk – surface water (pluvial)

The risk of surface water flooding has been assessed by viewing the Long-Term Flood Risk Map for Surface Water. This shows there to be a combination of 'low', 'medium' and 'high' risk of surface water flooding on Site. The majority of the Site is at risk of 'low' surface water flooding, with small pockets of 'medium' and 'high' surface water flooding located at the western and south-eastern edges of the Site.

The A404 acts as the main access point to the Site. The A404 is at high risk of surface water flooding (greater than 3.3% risk of flooding each year) and in some extreme rainfall cases access may be impeded.

The A406 to the north provides spatial separation from the River Brent and an informal flood defence through the A404 slip roads and road drainage, reducing the likelihood of flooding across the Site.

There are a 1425mm diameter and a 150mm diameter surface water drain to the south west of the site running roughly parallel to the railway. Surface water run-off from the Site currently drains into this surface water sewer.

Flood risk – artificial sources

The Environment Agency mapping shows there is a risk of artificial flooding to the entirety of the site. This is due to the site's location downstream of Brent Reservoir.

Flood Risk - sewer

Modern sewer systems are designed to be separate surface water and foul water systems, typically accommodating up to 1 in 30-year rainfall events. However, sewer system segments across London vary in capacity due to age. The Thames Water historical sewer flooding dataset within the SFRA indicates there are no records of sewer flooding on Site. Sewer records show a 225mm foul water sewer below the carriageway of Brentfield which connects to a 300mm sewer below the North Circular Road.

Hydrology

The Site is not located within, or in close proximity to a ground water Source Protection Zone (SPZ). Groundwater mapping indicates a very high likelihood or persistent or seasonally shallow groundwater. The Site is underlain by London Clay Formation (Clay, Silt and Sand) and made ground.

Consultation

Consultation with the Environment Agency will be undertaken to support the design and planning stages of the proposed development.

7.1.3 Legislation & Planning Policy Context

The following legislation and planning documents will be considered throughout the Flood Risk Assessment and Drainage Strategy.

- National Planning Policy Framework, 2023
- Planning Practice Guidance, and
- Water Framework Directive 2017.

7.1.4 Characteristics of Potential Effects

A Flood Risk Assessment (FRA) and Drainage Strategy will be prepared as standalone documents to support the planning application.

The FRA will provide a multi-modal appraisal of potential flood risk mechanisms across the site, including fluvial flow, ground water, overland flow sewer and artificial source types of flooding.

The drainage strategy will be informed by hydraulic modelling considering storm water conveyance and receptors.

The proposed development will be designed to mitigate flood risk, embedding mitigation within the design which will include a water entry strategy for high flooding events. In order to minimise water displacement within the site the majority of the ground floor will be designed as floodable, allowing water to flow into the building in high flood events. Water will also be allowed to enter basements and below ground carparks. The site will be reprofiled to create additional flood plan storage.

Development design includes utilising Sustainable Urban Drainage Systems, which will be considered and highlighted in the Drainage Strategy, in line with Natural England requirements.

In addition, a Flood Warning and Evacuation Plan will be produced for the site.

7.1.4.1 Construction Phase

At the construction phase the key impacts to the water environment will be as follows:

- There is a low risk that construction works, including compounds, vehicle tracking, excavations, tracking activities and storage could increase pollutant and sediment laden run off locally that would drain into and enter the nearby watercourse. This could adversely affect surface water quality; and,
- Release of construction related polluting matter into groundwater, including fuel, oils and materials such as cement and concrete have the potential to create pathways which are polluted, or sediment laded which could enter the below ground profile.

At the construction phase appropriate measures will be put in place prior to construction work in accordance with best practice methods and legislative requirements (e.g. the EA's Pollution Prevention Guidelines) to prevent water pollution.

Mitigation to reduce construction phase effects will be detailed in a Construction Environmental Management Plan.

7.1.4.2 Operational Phase

During operation the key impacts to the water environment will be as follows:

- The operational phase will lead to an increased demand for potable water and foul water discharge as a consequence of the proposed development.
- The site boundary includes areas within Flood Zones 2 and 3. Therefore, if unmitigated, the proposed development would cause a reduction in floodplain storage and could increase the risk of fluvial flooding in the area. Development in the floodplain can also interrupt or change fluvial and surface water flow paths;
- Loss or change to surface water supplies due to degradation of water quality, changes in drainage patterns or disruption to supply infrastructure; and
- New impermeable areas can also increase the risk of flooding from surface water as there is less permeable area to store water. This could increase the potential for the ponding of water.

Once operational it is proposed below ground drainage system will connect into the existing Thames Water surface water sewer, with a reduced run-off rate from the introduction of soft landscaping and the inclusion of Sustainable Urban Drainage Systems to restrict run-off.

Infrastructure requirements for foul water collection and delivery to wastewater treatment plans will be investigated and addressed as part of the drainage strategy.

7.1.5 Potential Effects Not Requiring Further Assessment

The proposed development is situated circa 60m from the River Brent, separated by the A406 (Circular Road). Due to the spatial separation of the site from the River Brent construction phase effects on the river are not considered to be significant.

A Flood Risk Assessment and Drainage strategy will be submitted as standalone documents as part of the planning application and will consider flood risk and drainage. This will outline the drainage control measures incorporated into the proposed development. This will mitigate any increase in flood risk from the proposed development and restrict all outlines to an acceptable rate of runoff. These measures will ensure the proposed development results in no significant effects on flood risk or local water courses during operation. Therefore, no significant impacts are envisaged.

In conclusion, the proposed development is not expected to have a significant effect on local water resources, flood risk of drainage and therefore is proposed to be scoped out of the Environmental Statement.

7.2 Utilities

7.2.1 Introduction

This section sets out the proposed approach to the assessment of the existing utilities present at the Site with respect to the development masterplan and expected connections to facilitate demand for residents. A sensitivity analysis of affected receptors and wider sustainability goals, as outlined by the London plan, has been complete to inform connection of utilities.

7.2.2 Existing Environment (Baseline)

The Site is bound to the north west by the North Circular, on the south west boundary by a rail embankment and on the north eastern side by the Brentfield Road. The Site is brownfield with the existing Bridge Park Community Leisure Centre, the former Unisys Buildings, Technology House, as well as a scrap yard and substations. The Site is located on the north side of the Royal mail distribution centre with connecting Network Rail infrastructure. Most of the Site is urbanised with existing tarmac hardstanding.

7.2.3 Legislation & Planning Policy

The London Plan Policies

'The London Plan 2021 is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the mayor's vision for Good Growth.'[10]

It is critical that the development considers how to support London in meeting net zero targets by:

- Reducing demand on utility networks;
- Integrating with statutory undertaker strategies and targets;
- Capitalise on the natural environment to achieve sustainability goals;
- Engaging with the circular economy and development frameworks;
- Providing a baseline to inform success across the proposed development lifetime.

The London Plan policies relevant to utilities include:

- Policy SI 2 Minimising greenhouse gas emissions
- Policy SI 3 Energy infrastructure
- Policy SI 4 Managing heat risk
- Policy SI 5 Water infrastructure

[10] London Assembly, (2021). The London Plan 2021 [Available from: https://www.london.gov.uk/programmes-strategies/planning/london-plan/new-london-plan/london-plan-2021]

7.2.4 Characteristics of Potential Effects

7.2.4.1 Construction Phase

The following effects related to the construction phase of utility installation are proposed to be assessed:

- Effects associated with intrusive groundworks and construction activities with respect to:
    - Existing foul water networks;
    - Potable water mains;
    - Existing gas mains;
    - Existing electrical infrastructure, and;
    - Telecommunications.
- Effects associated with road users or royal mail if intrusive ground works are incident to active infrastructure near the development.

7.2.4.2 Operational Phase

The following effects related to the operational phase of the development are proposed to be assessed:

- Effect of heat risk associated with large developments in highly urbanised areas;
- The effect of ongoing consumption with respect to long term emission targets, and;
- Reducing waste and ensuring efficiency.

7.2.4.3 Study Area

The proposed geographical extent of the study area for the Utilities Assessment will be limited to the proposed redline boundary that confines the development. Effects of operation and consumption of utilities will be assessed in the context of London's wider infrastructure requirements as detailed by the London Plan.

7.2.5 Assessment Methodology

Enquiries were sent, via Subscan Technology, to all the relevant utility companies, statutory undertakers, and authorities. Internet queries and searches were also performed through various website companies such as LineSearch and Sitefinder. The information in this section is based on the responses received to date from the following service providers.

Table 26 Summary of Main Utility Providers

Utility	Service Provider with Services on or adjacent to site
Water (Mains)	Affinity Water
Drainage & Sewerage	Thames Water Utilities Ltd
Electricity	UK Power Networks (UKPN)
Gas	National Grid
Telecommunications	BT

It should be noted that the existing utility systems may have had new third-party connections made to them at any time. The advice given within this section has been based on

information received from utility companies and could be subject to change. Supplies cannot be guaranteed until formal quotations have been accepted and paid for.

The level of effects is ascertained through a combination of the sensitivity of the receptor and the magnitude of change that would arise because of the Proposed Development.

7.2.5.1 Identification and Appraisal of Receptors

London utilities network

As the UK aims to meet decarbonisation targets, methods to introduce integrated systems to manage a communities' utility consumption are proposed as shown by the Mayor of London's, London Plan. The effects of new developments must consider the impact of introducing new capacity requirements wholistically with regional and local constraints.

The Greater London Authority (GLA) has produced the energy hierarchy to which informs developments on delivering sustainable delivery of utilities. The hierarchy has a guide on how London will be shaped to deliver long term, affordable energy and considering whole life carbon cycles.

Positive effects are those considered to support integration with existing networks and optioning to anticipate future connections based on local development plan and tangibly improve overall network efficiency. Negative effects are characterised by inefficient design concepts that may reduce the overall efficiency benefits associated with dense residential developments.

Negative effects are those considered to adversely affect existing utilities resulting in damage, decreased performance or unmanaged changes. Since affected utilities often service neighbouring areas, utility demand and proposed network upgrades must consider long term affects such as maintenance access requirements, optioning to upgrade or modify when required.

Heat Risk

Due to London's high urbanisation, average ambient temperatures can be as high as 10 degrees higher than that of neighbouring rural areas[11]. This may result in ecological damage to natured areas and waterways as they absorb greater than average thermal energy. Furthermore, vulnerable communities may be affected by high temperatures and increase risk their health and wellbeing.

Positive effects are those considered to capitalise on ambient thermal emissions from hardstanding, usually associated with highly dense dwellings in urban environments. Methods to passively manage heat risks that incorporate London's efficiency goals and offer provision to integrate with neighbouring high-risk areas.

7.2.5.2 Existing Utilities

Note the utilities search was completed August 2021 and will be revised to carry out detailed review prior to breaking ground.

Foul and Surface Water Drainage

The public sewerage network is maintained by Thames Water. An existing services request was submitted to Affinity Water for details of any water supply apparatus on or adjacent the development Site.

[11] Mayor of London, 2021. *What is the issue with heat?*

Records indicate that there is a 225mm dia. Foul water sewer running below Brentfield from the eastern corner of the site, connecting it to a 300mm dia. sewer running under the North Circular. This 300mm dia. sewer runs parallel with the north west boundary of the site and then crosses north under the North Circular. The sewer is approximately 2.6m deep.

There is a 225mm dia. surface water sewer running below Brentfield, along the north eastern boundary of the Site. A 1350mm dia. sewer enters the Site from the north east corner of Brentfield. This sewer runs parallel with the eastern boundary of the site, adjacent Technology House and then connects into a 1425mm dia. sewer in the south eastern corner of the Site. The 1425mm dia. sewer runs along the boundary of the site, adjacent the rail embankment and then crosses under the North Circular, varying in depth from 2.3-3.3m. There is a connection into the 1425mm dia. sewer in the south eastern corner of the Site from the residential area adjacent the Site boundary.

There is also a 150mm dia. surface water sewer that runs alongside part of the 1425mm dia. sewer adjacent the rail embankment; the depth of this sewer is unknown.

There is a 225mm dia. Sewer that runs under Brentfield, on the north corner of the site, and crosses northwards under the North Circular Road.

Potable Water Supply

An existing services request was submitted to Affinity Water for details of any water supply apparatus on or adjacent the development site.

Records indicate that there are two number, 4” CI/SI distribution mains running long Brentfield, one with a branch off and hydrant on the edge of the site boundary. There are also two number, 150mm diameter distribution mains that run along the northern and north-western boundary of the Site within the north Circular Road. There is a branch line coming into the Site in the north eastern corner.

There are a number of abandoned water main lines at the Northern end of Brentfield.

Electricity Supply

An existing service request was submitted to UKPN for details of any electrical apparats on or adjacent the development site.

Records indicate that there is a route of HV, LV and Pilot cables running along the Brentfield and North Circular roads. The cable cuts into the Site on the north and north-western corners.

There are three substations highlighted on the northern part of the Site. The substations are referenced on the UKPN drawings as:

- Brentfield Stonebridge Comm Comp (23351);
- Brentfield Veola Booster (24746); and
- Brentfield Sperry Univac (22356) – appears to be within the multi-storey building.

The substations ratings are not indicated on the drawings and the power requirements for the electrical loads serving the existing buildings are unknown.

The Brentfield Veola Booster appears to serve other areas and will need to be retained. The Brentfield Stonebridge Comm Comp substation also serves off site areas and will need to be retained. Relocation of the substations will need to be negotiated with UK Power, require another location, and will add significantly to costs.

The route of LV electrical cables to the existing buildings within the Site boundary is not shown and the LV ratings serving the existing buildings within the Site are unknown. The

existing Block A substation will need to be replaced to meet the expected new load, either at the present location or relocated to suit the development.

A number of HV, LV and pilot cables run along Brentfield and North Circular Road. It is noted that some of the cables exit the end of the Site by the proposed Hotel car park, within the Block A boundary, to the west side and will form a constraint.

An application to UK Power Networks for a budget estimate to change to an existing connection was made on 7/9/2017.

Following a telephone call on 25/9/2017 with the Customer Connections department in UK Power Networks (LPN), they confirmed the application for Budget Estimate (Job. No. 85000 69415) has been handed to the Distribution Planning section and a response expected w/c 2/10/2017.

Gas Supply

An existing service request was submitted to National Grid for details of any gas apparatus on or adjacent the development Site.

The record drawings indicate a 12”, DI, low pressure gas main running along the opposite side of the Brentfield Road in the north-eastern corner of the Site. The gas main then crosses the road as a 100mm DI pipe and runs along the boundary of the site, terminating at the electrical substation.

There is also a 12”, intermediate pressure gas main, referenced as NL0108 Alperton Loop that crosses the North Circular Road and runs along the northern boundary of the Site, then crossing Brentfield Road and continuing along the Conduit Way.

Telecommunications

An existing service request was submitted to Telecommunications providers for details of any telecommunications apparatus on or adjacent the development site.

Underground plant, i.e., ducts, joint boxes, are located along the site boundary with Brentfield and the North Circular Road. There are 6 spurs off the Brentfield line coming into the Site and ending at the existing buildings where there are distribution points.

Pipelines

An existing services request was submitted to ‘Linesearchbeforeyoudig’, a search facility which is a single point of contact for over 50 asset owners.

The search has indicated there are no assets in the vicinity of the proposed development area, except those noted in the preceding sections.

Not Affected Responses

Table 27 below lists the utility companies who advised they have no services on, or adjacent to the Site.

Table 27 Companies Not Affected by Site

Utility Company – Not Affected Response	
Sky Telecoms Services	ESSAR
Network Rail	Esso Petroleum Company Limited
Colt Technology Services	Fibrespeed Limited
Brent Council CCTV	Fulcrum Pipelines Limited
Crossrail	Gamma
Energetics	Humbly Grove Energy
EU Networks Fiber UK Ltd	IGas Energy

Utility Company – Not Affected Response	
Fulcrum Pipelines Ltd	Ineos Enterprises Limited
GTC	INEOS Manufacturing (Scotland and TSEP)
Instalcom Ltd	Lark Energy
London Underground	Lightsource SPV Limited
Plancast	Mainline Pipelines Limited
Teliasanera	Manchester Jetline Limited
Trafficmaster	Manx Cable Company
MBNL	Marchwood Power Ltd (Gas Pipeline)
Verizon	Npower CHP Pipelines
Virgin Media	Oikos Storage Limited
AWE Pipeline	Perenco UK Limited (Purbeck Southampton Pipeline)
BOC Limited (A Member of the Linde Group)	Petroineos
BP Midstream Pipelines	Phillips 66
BPA	Premier Transmission Ltd (SNIP)
Carrington Gas Pipeline	Redundant Pipelines – LPDA
CATS Pipeline c/o Wood Group PSN	RWEnpower (Little Bradford and South Haven)
Cemex	SABIC UK Petrochemicals
Centrica Energy	Scottish Power Generation
Centrica Storage ltd	Seabank Power Ltd
CLH Pipeline System Ltd	Shell (St Fergus to Moddmorran)
ConocoPhillips (UK) Ltd	Shell Pipelines
Coryton Energy Co Ltd (Gas Pipeline)	Total (Finaline, Colnbrook & Colwick Pipelines)
CSP Fibre c/o Centara	Transmission Capital
Dong Energy (UK) Ltd	Uniper UK Ltd
E.ON UK CHP Limited	Vattenfall
EirGrid	Western Power Distribution
Electricity North West Limited	Wingas Storage UK Ltd
ENI & Himor c/o Penspen Ltd	Zayo Group UK Ltd c/o JSM Group Ltd
ESP Utilities Group	Northumbria Water Group

7.2.5.3 Sensitivity

The sensitivity of the receiving environment (i.e., the baseline of the existing network as well as its ability to integrate and adapt to anticipated change) is defined in **Table 28 below**.

Table 28 Receptor Value/Sensitivity Assessment

Receptor value / sensitivity	Receptor type
High	International importance. Receptor with a high priority, regional or national scale and limited potential for substitution / replacement.
Medium	National importance. Receptor with a high priority, local scale, and limited potential for substitution / replacement; or Receptor with a medium priority, regional or national scale and limited potential for substitution / replacement.
Low	Regional importance. Receptor with a medium priority, local scale and limited potential for substitution / replacement; or Receptor with a low priority and rarity, regional or national scale and limited potential for substitution / replacement.
Negligible	Local importance. Receptor with a low quality and rarity, local scale. Environmental equilibrium is stable and is resilient to changes that are greater than natural fluctuations, without detriment to its present character.

7.2.5.4 Magnitude of Change

The criteria that have been used to assess the magnitude of potential impacts (i.e., the potential scale of change) to the hydrological and hydrogeological environment are defined in **Table 29 below**.

Table 29 Magnitude of Potential Impacts to Hydrological and Hydrogeological Environment

Magnitude	Description	Definition
High	Results in loss of attribute	Fundamental (long term or permanent) changes to network performance and or capacities, such as: - Wholesale changes to main distribution utilities. - Changes to the application Site resulting in a significant increase in demand that cannot be facilitated by existing infrastructure.
Medium	Results in impact on integrity of attribute or loss of part of attribute	Material but non-fundamental and short to medium term changes to network performance and or capacities, such as: - Some measurable changes to main distribution utilities. - A moderate increase in demand requires facilitation at considerable cost.

Magnitude	Description	Definition
Low	Results in minor impact on attribute	Identifiable but non-material and transitory changes to network performance and or capacities such as: - Minor or slight changes to the existing networks such as rerouting or upgrades. - Changes to application Site resulting in slight increase capacity demand.
Negligible	Results in an impact on attribute but of insufficient magnitude to affect the use. Integrity.	No perceptible changes to network performance and or capacities. - No impact or alteration to affected utilities.

It should be noted that many potential impacts are probabilistic in nature (i.e., failures could occur but only under extreme conditions). This type of impact is clearly different from one that has a higher probability to occur and as such where appropriate, and with justification, professional judgement would be used to adjust the stated magnitude of an impact for low probability impacts.

7.2.6 Assessment of Effects

7.2.6.1 Existing Utilities

Utilities are likely to be at risk of disruption during construction. The exact location and extents of easements will be determined during Site investigations.

It is understood that utility providers have easements rights within the development area, the development masterplan has considered the affected Thames potable water trunk main that bisects the development Site as a medium sensitivity receptor. Buildings have therefore been positioned to avoid existing Thames water infrastructure including provision of easement.

The 1425mm dia. Surface water sewer that runs adjacent the rail embankment has unknown invert levels, the development has located the leisure centre and NAIL dwelling and dwellings G – K over the sewer. The Sewer services Brent to the east and north of the development and is therefore considered to be low sensitivity.

The pipe depth varies from 2.3-3.3m, however; the extent and precise levels of the network within the development boundary must be understood through CCTV surveys of existing manholes and be carried out before commencing intrusive ground works. Foundations of tall buildings must not negatively impact the performance of the sewer utilities through piling.

7.2.6.2 Water Infrastructure

It is recommended by the GLA that options for reducing potable water demand for residence be undertaken by use of integrated water management systems. The local supplier, Thames Water, has been designated under ‘serious water stress’ since 2013[12], therefore; appropriate measures to reduce potable water demand where possible have been considered. South

[12] Environment Agency, (2021). Water stressed areas – final classification 2021

east water management constitutes as a medium sensitivity receptor with consequences affecting many consumers and businesses with few feasible alternatives for mitigation.

Though the development cannot directly address this issue, consumer demand can be reduced through effective design of dwelling spaces and amenities. The London Plan addresses this by encouraging developers to reduce consumption first under the 'Be Lean' value hierarchy.

As part of the wider application, a Surface Water Drainage Strategy shall be developed whereby runoff will be utilised for amenity spaces where possible, promoting biodiversity and reducing potable water demand by reclamation or reuse of grey water.

Initial liaison with Thames Water has indicated that the development is likely to require upgrades to the wastewater network. A phased housing and infrastructure plan has been developed by a staged approach, ensuring demand can be met as development continues by identifying additional capacity requirements early, reducing risk to the waste treatment capacity for the local area.

To reduce overall demand, efficient fittings and monitoring flow rates will reduce potable water demand of the development. Consumption rates will be targeted to an average 110l/s/day. Maintenance plans developed for dwellings and amenity areas will proactively identify leak risk and offer suitable data collection to conform to 'Be Seen' frameworks.

7.2.6.3 Heat Risk

London has higher average temperatures when compared to the rest of the UK due to high urbanisation, absorbing thermal energy; this is then emitted into the immediate environment increasing London's overall average temperature; constituting a medium sensitivity receptor. Ambient heat has therefore been factored into energy calculations to optimise energy consumption and reduce the prevalent heat risks.

Utilising passive heat transfer from the environment coupled with to capitalise on thermal efficiency. Buildings additionally are positioned and orientated to maximise efficiency and use energy from local secondary heat sources.

The Site lies within A Heat Priority Area which is defined by the GLA as:

"*… [Areas] in London [where] the heat density is sufficient for heat networks to provide a competitive solution for supplying heat to buildings and consumers."*

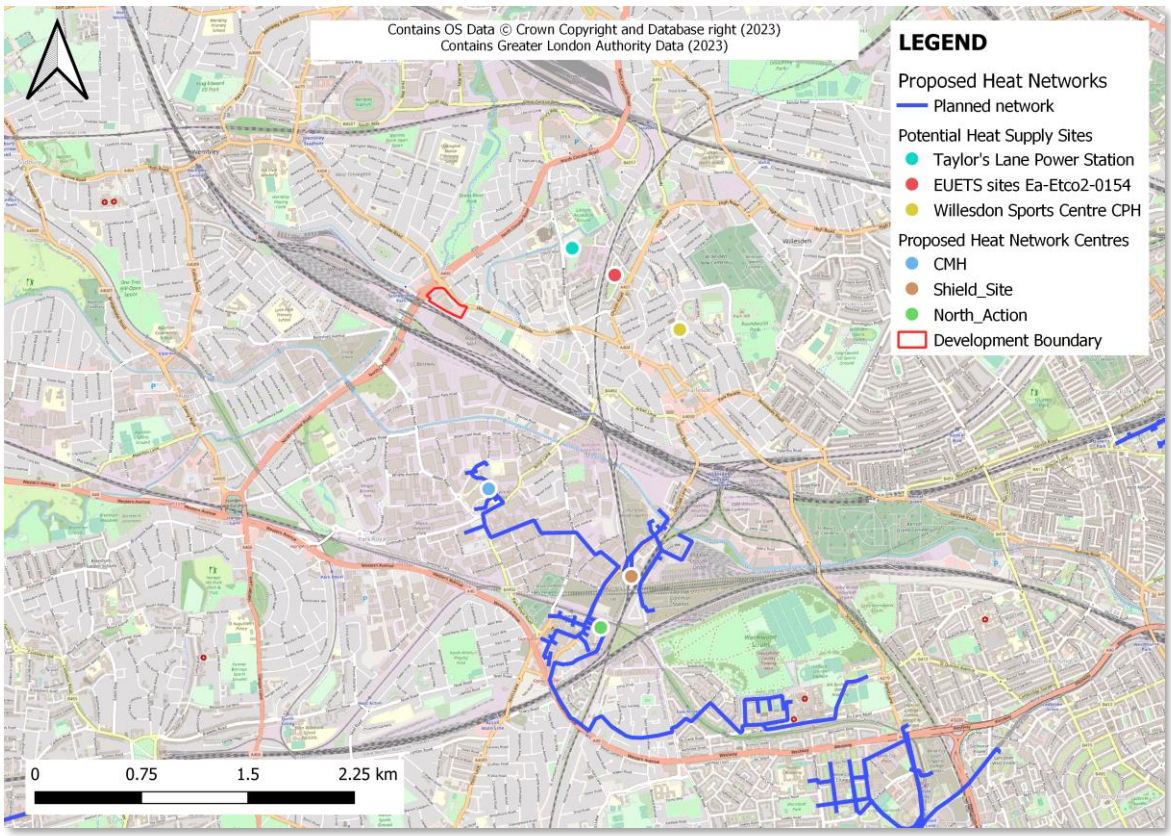
"To comply with London Plan Policy SI 3, developments in Heat Network Priority Areas (HNPAs) should have a communal low-temperature heating system and should select a heat source in accordance with the following heating hierarchy:

a) *Connect to local existing or planned heat networks;*
b) *Use zero-emission or local secondary heat sources (in conjunction with heat pump, if required);*
c) *Use low-emission combined heat and power (only where there is a case for it to enable the delivery of an area-wide heat network, meet the development's electricity demand and provide demand response to the local electricity network);*
d) *Use ultra-low nitrogen oxides (NOx) gas boilers."*

In line with the Energy Hierarchy[13], the development shall achieve on-site carbon reductions and mitigate heat risk with a closed heat pump for dwellings.

It is envisaged that air source heat pumps will be implemented with intent to provide future connections to proposed Combined Heat and Power (CHP) systems and plants. Feasibility shall be undertaken during design stages with respect to future developments and local opportunity areas.

Figure 16 Proposed Heat Networks



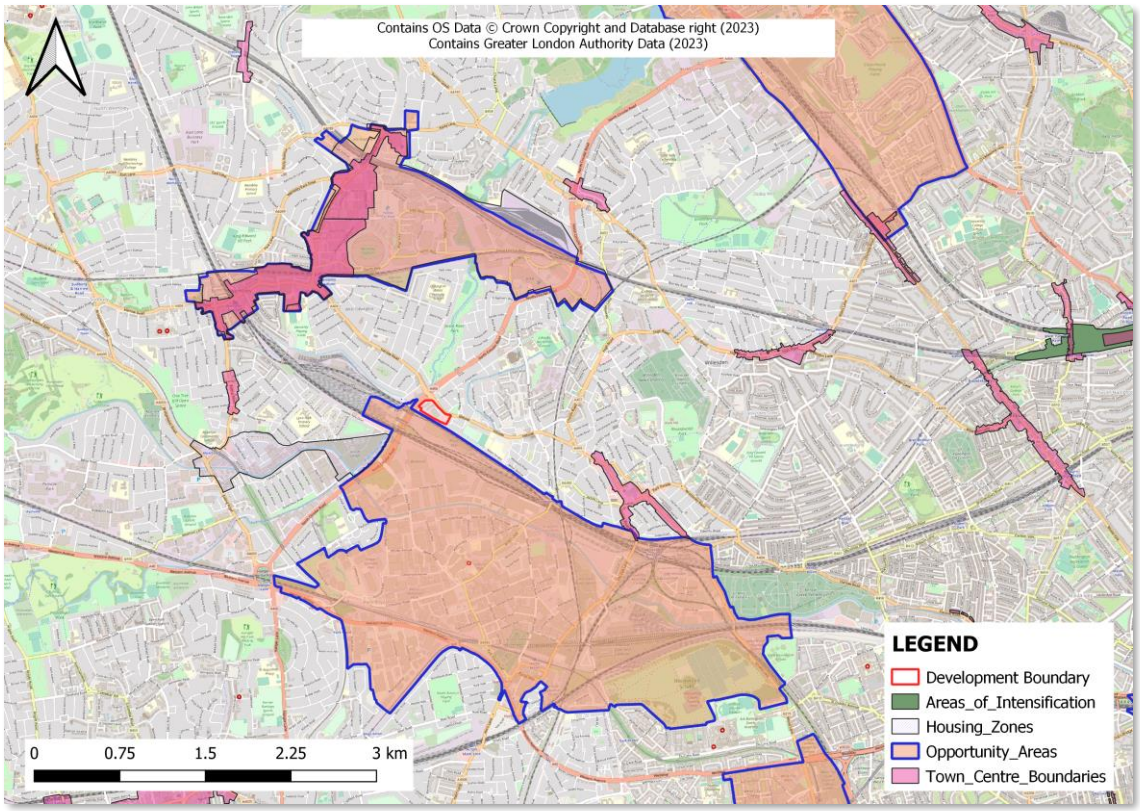
7.2.7 Long-term Development

It has been recognised that long term monitoring of implemented sustainability strategies is required to assess delivery against estimated baselines. Baselines shall be followed by a second stage of reporting during ‘as-built’ stages of to confirm outlined sustainability outcomes.

As London continues to grow, the development will seek to consolidate London’s sustainability goals. Continued development offers opportunity to improve the quality of life for residence, improve London’s infrastructure network wholistically and allow neighbouring developments to fully capitalise on efficient infrastructure connections.

[13] Greater London Authority, (2022). Energy Assessment Guidance.

Figure 17 Opportunity Areas for Long-term Integration



7.2.8 Potential Effects Not Requiring Further Assessment

Utilities identified within the proximity of Site will likely be utilised for servicing the development, including telecommunications and electricity. Connections shall fall under standard procedures of liaising with statutory undertakers, following their requirements to ensure connections and development is carried out safely and do not adversely affect the local networks.

Gas mains are unlikely to be connected as to prioritise reducing London's overall carbon consumption, the masterplan does not show any incidents to existing gas infrastructure and is unlikely to be significantly affected by development. Any intrusive groundwork shall acknowledge the presence of gas lines, particularly the identified Alperton Loop, and shall undergo ground truth surveying prior to breaking ground.

It is probable that unidentified and abandoned utilities exist within the Site but, by their very nature, are considered to have extremely low receptor risk as they no longer operate. If identified, standard procedures of investigating unknown utility infrastructure will be carried out to confirm its nature and risk.

7.2.9 Conclusions on Utilities

SLR Consulting Limited has been appointed by Stonebridge Real Estate Development Ltd Limited to conduct an environmental assessment of utilities which serves to support and inform the planning application for sustainable development at Bridge Park, Brent London.

The environmental scoping assessment has identified the extent of existing utilities in the context of the development and has identified potential receptors in line with London sustainability goals to support sustainable delivery.

In conclusion, it is anticipated that there are no insurmountable issues associated with the provision of utilities infrastructure to serve the proposed quantum of development at the Site. Due care and consideration shall be applied where appropriate when conducting any intrusive ground works. The development shall seek to clearly identify and verify present sensitive receptors and plan any works accordingly.

Finally, it is highly recommended that an additional utilities search be complete due to the age of search data. Utility markers or infrastructure identified shall be compared against the data search by a Site visit from an experienced engineer with any discrepancies highlighted and investigated further.

7.3 Energy & Sustainability

The Site comprises a mixture of hard standing; the former Unisys office buildings; Bridge Park Community Leisure Centre; a number of small industrial and commercial units within Technology House; other outbuildings and temporary structures; a scrapyard which is landlocked; amenity tree and shrub planting associated with public open space and small areas of rough grassland. It is expected that the baseline energy use and associated carbon emissions would be higher than present.

The construction of the Development will involve the consumption of energy through electricity and fuel to power the construction plant and ancillary construction infrastructure.

During construction the provisions of the Construction Environmental Management Plan will ensure that energy use is minimised as far as practicable and best practice measures will be adopted on Site.

An Energy Strategy will be prepared for approval as part of the planning application and will set out how the Development will achieve the requirements of current building regulations and conform to local policy for both the residential and commercial elements of the Proposed Development.

To minimise the overheating risk, we will follow CIBSE TM59 (Part O).

A lifecycle carbon assessment will look at CO_2 emissions for the whole building life (including embodied carbon end of life scenarios). Approved One Clock LCA software will be used to quantify the assessment, and it will also follow GLA Guidance.

In addition, the Proposed Development will meet the BREEAM rating of ‘excellent’, and would adopt the principles of Circular Economy, following the GLA guidance.

It is proposed that issues of energy consumption are scoped out of the ES for both construction and operation for the reasons set out above.

7.4 Tree Survey & Arboricultural Impact Assessment

Whilst cross referenced by other technical reports and ES Chapters, the Tree Survey and Arboricultural Impact Assessment is factual in nature and will be submitted as a standalone report in support of the planning application submission. As such, the document will not be contained within the EIA, nor will a technical chapter be prepared as part of the ES.

The Tree Survey and Arboricultural Impact Assessment report is being prepared to consider trees on and adjacent to the site. The report will be prepared in accordance with BS5837:2012 ‘Trees in relation to design, demolition and construction’.

Outputs will include a Tree Survey and Plan, Tree Constraints Plan, and Arboricultural Implications Assessment

7.5 Heritage and Culture

Whilst it is not expected that the Proposed Development is to give rise to such impacts, therefore this topic is to be scoped out of the assessment. Whilst cross referenced by other technical reports and ES Chapters, the Heritage Impact Assessment will be submitted as a standalone report in support of the planning application submission. As such, the document will not be contained within the EIA, nor will a technical chapter be prepared as part of the ES.

7.6 Resource Efficiency

7.6.1 Introduction

LBB is a Waste Collection Authority responsible for the collection of household waste arising within the Borough. Treatment and disposal of all municipal solid waste collected within the Borough is the responsibility of the West London Waste Authority (WLWA).

Based on Government statistics (Defra waste data reports[14]), in the year 2021-22 LBBC managed c. 112,500 tonnes of local authority collected waste. Of this tonnage, c. 89,700 tonnes were household wastes and c. 22,800 tonnes were non-household wastes. It is important to recognise that whilst LBBC collects some commercial wastes (such as that generated by the existing leisure centre), the large proportion of commercial wastes arising within Brent will be collected by private sector waste management companies.

The construction of the Development will result in an increase in overall waste arisings for the LBBC (due to the intensification of dwelling numbers on the site); it is therefore important that a Waste Management Strategy is adopted that aims to manage the waste from the Development in a sustainable manner and that minimises and mitigates against the resultant environmental impact. Of critical importance to the long-term success of the Development is to ensure that adequately sized areas are defined for the storage of waste containers for ease of access by residents / commercial users and those parties responsible for collection the wastes.

7.6.2 Legislation Planning Policy Context

This section provides an overview of relevant policy governing waste management. All waste assessments to be carried out will give due consideration to relevant national and local legislation, and relevant local planning guidance including, but not limited to:

- Environmental Protection Act 1990;
- Clean Neighbourhoods and Environment Act 2005;
- The Site Waste Management Plans Regulations 2008 (repealed, but noted as good practice);
- The Waste (Circular Economy) (Amendment) (England and Wales) Regulations 2020;
- Resources and Waste Strategy for England 2018;
- West London Waste Authority Waste Strategy;
- Brent Council Municipal Waste Management Strategy;
- Brent Council Waste and Recycling Storage and Collection Guidance for Developers; and
- BS5906:2005 – Waste Management in Buildings Code of Practice.

7.6.3 Assessment Methodology

Two reports will be prepared to assess the impacts associated with the waste likely to be generated from the Development:

[14] https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables-202122

- a Site Waste Management Plan (SWMP) – which will reflect the approach to be taken to manage wastes arising from demolition and construction activities associated with the proposed development; and
- an Operational Waste Management Strategy (OWMS) – which will consider the storage and management of wastes generated during the normal course of occupation and use of the proposed development.

7.6.3.1 Construction & Demolition Wastes

The SWMP will be designed to improve the management of wastes generated during the demolition and construction phase of the development project, setting targets for waste minimisation (prevention, reuse and recycling) to reduce the quantity of material requiring disposal. It will be a live document and at the relevant point in time will be passed to the principal contractor (yet to be appointed) for updating prior to commencement of demolition and construction on site. Thereafter the document will be updated as and when required.

Although SWMPs are no longer a statutory requirement in England, the Client is committed to ensuring that they adopt a sustainable approach to the management of materials and wastes. The production of a SWMP as good industry practice will demonstrate that due consideration has been given to the potential impacts that construction wastes may have on the environment and where possible minimise wastes, and where not possible to minimise wastes, have in place systems which maximise the beneficial use and recycling of materials.

7.6.3.2 Operational Wastes

The Development is likely to result in an increase in overall waste arisings from the LBBC area; it is therefore important that an OWMS is adopted that aims to manage the waste from the Development in a sustainable manner which minimises and mitigates against the resultant environmental impact.

LBBC currently collects c. 89,700 tonnes of household waste from c. 125,285 properties[15]. As identified above, the waste collected by LBBC is managed by WLWA. In 2021/22 99.7% of WLWA was diverted from landfill.

Operational wastes generated by the Development will be of a similar type and characteristic to those already generated across the Borough. Although waste quantities may increase for the proposed development, the scale of any increase is expected to be limited.

7.6.4 Summary

Based on the robust methods of minimising construction and demolition wastes that will be proposed in the SWMP and the highly regulated waste management sector ensuring wastes are managed in accordance with the waste hierarchy to minimise environmental impacts, it is proposed that construction and demolition waste is scoped out of the EIA.

The proposed development of c. 811 No. residential units represents an increase in the LBBC household numbers of up to 0.65%. Therefore, the household waste arisings of LBBC could increase by up to 0.65% which is negligible; and it is on this basis that it is proposed that the operational waste is scoped out of the EIA.

15 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/987584/LT_100.ods

7.7 Other Environmental Issue

A number of other environmental issues will be considered in relation to the proposed development. These include matters recently introduced into EIA requirements through the EIA Regulations 2017. The approach to the following topics is outlined below:

- Infrastructure;
- Population and Human Health;
- Climate and Carbon Balance; and
- Risks of Major Accidents and/or Disasters.
- Transboundary Effects

Some of these topics are considered unlikely to be significant issues for a development of this nature at this location during either the construction or operational phases of the development. Therefore, it is proposed that these are 'scoped out' of the assessment. These are discussed, in turn, below.

Notwithstanding, a chapter entitled 'Other Environmental Issues' shall be prepared within the EIA and ES which provides a tabulated summary of where such topics have been considered by the various technical disciplines.

7.7.1 Infrastructure

As this site is located within an urban context, details of any potential infrastructure will be checked and taken into account during the design of the proposed development. If, as expected, there is no significant equipment within the site then no significant effects on infrastructure are likely and this topic will be scoped out of the assessment. In the unlikely event that significant infrastructure, such as major gas pipelines or overhead power lines, is identified then agreement with the relevant providers on appropriate mitigation will be sought to provide full and effective mitigation.

7.7.2 Population & Human Health

The EIA Regulations 2017 include a requirement to assess, as part of the EIA process, the potential significant effects on population and human health resulting from the proposed development. These new requirements will be addressed in the EIA and ES, as appropriate, under any relevant ES topic chapter (i.e. Air Quality, Cultural Heritage, Noise, Socio-Economics etc.). Where no significant effects are likely these are scoped out of the assessment.

7.7.3 Climate & Carbon Balance

The EIA Regulations 2017 include for consideration of potentially significant effects on climate which includes greenhouse gases. Effects on climate and carbon balance will be addressed in the EIA and ES, as appropriate, under any relevant ES topic chapter (i.e. Ground Conditions, Ecology, Flooding and Water Environment etc.). Where no significant effects are likely these are scoped out of the assessment.

7.7.4 Risks of Major Accidents and/or Disasters

The EIA Regulations 2017 indicate that an EIA should include any expected significant adverse effects deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned.

Whilst it is not expected that the proposed development is likely to give rise to any such effects, these new requirements shall be addressed in the EIA and ES, as appropriate, under any relevant ES topic chapter (i.e. Flooding and Water Environment etc.). Where no significant effects are likely these are scoped out of the assessment.

7.7.5 Transboundary Effects

Given the scale of the development and the urban context of the site, Transboundary Effects in accordance with Schedule 4 of the EIA Regulations 2017 are not considered likely. As such, whilst considered through the undertaking of the various technical assessments, Transboundary Effects will be scoped out of the EIA and ES.

8.0 Closure

This Scoping Request Report outlines the proposed technical and environmental assessments that will be included within the ES for the Proposed Development, an overview of the technical studies which have been scoped in and out is shown below in **Table 30, Overview of Proposed EIA Scope.** The proposed scope and methodologies for each assessment have been provided and the guidance to be followed set out.

Table 30 Overview of Proposed EIA Scope

Element	Scoped in or out of further assessment
Town and Visual Assessment	Scoped In
Ground Conditions and Contamination	Scoped In
Noise and Vibration	Scoped In
Air Quality	Scoped In
Ecology	Scoped In
Traffic and Transport	Scoped In
Wind Engineering	Scoped In
Daylight, Sunlight and Overshadowing	Scoped In
Socioeconomic	Scoped In
Flooding and Water Environment	Scoped Out
Utilities	Scoped Out
Energy and Sustainability	Scoped Out
Trees	Scoped Out
Heritage and Culture	Scoped Out
Infrastructure	Scoped Out
Resource Efficiency	Scoped Out
Population and Human Health	Scoped Out
Climate and Carbon Balance	Scoped Out
Risks of Major Accidents and/or Disasters	Scoped Out
Transboundary Effects	Scoped Out

The Scoping Request element of this report (Sections x-x) has sought a proportional approach to the EIA, detailing what topics will be ‘Scoped In’ to the ES (Section x) and those which are to be ‘Scoped Out’ of the ES given that they are not likely to raise significant effects (Section x).

For those topics to be ‘Scoped In’ to the ES, Section x has sought to detail key legislative, guidance, planning policy or background information that has informed the methodology proposed. The report also details the baseline and methodology of the assessments considered necessary to assess the environmental impact of the proposed development.

In addition to the above, Section x of this report also details the ‘Approach to the EIA’, including overarching methodological approaches relating to the structure and format of the

Environmental Statement, consideration of alternatives and the assessment of cumulative impacts.

Notwithstanding, it should be noted that other information pertinent to the consideration of the development proposals will be submitted outside of the remit of any Environmental Statement, such as the Planning Statement and Development Drawings.

It is therefore formally requested that LBB formally adopts a Scoping Opinion for the proposed development under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

Should any further information be required in order that a full EIA Scoping Direction can be provided we would be happy to provide further information and/or discuss any further requirements.

We trust that this document and associated plans has outlined the Proposed Development in sufficient detail for Brent Council to provide its decision. However, should you have any queries or require any additional information, please do not hesitate to contact us directly: