



Wembley Greenway EIA Scoping Report

Prepared for:
Regal High Road Two Limited

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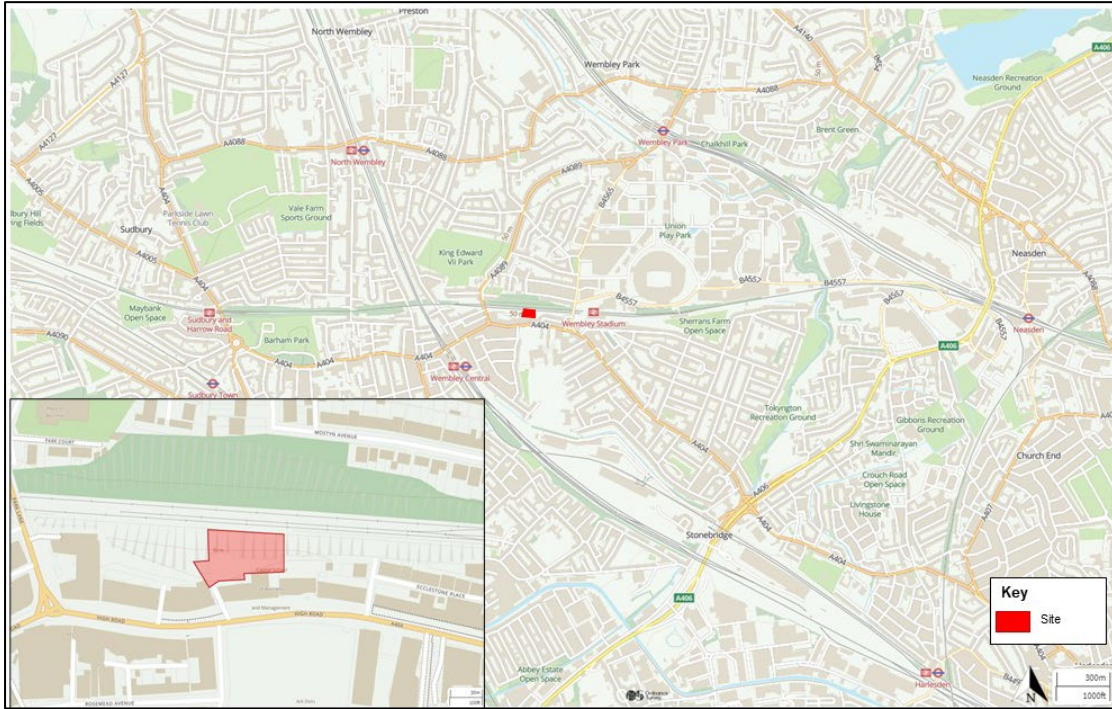
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INTRODUCTION

- 1 Regal High Road Two Limited (hereinafter referred to as the 'Applicant') is seeking planning permission for the development of an area of land (0.3 hectares (ha)) located in Wembley in the London Borough of Brent (LBB) (the site).
- 2 The site is located at land north of 390-408 High Road (A404), Wembley, in the LBB and south of railway lines associated with Chiltern Railways. Wembley Stadium lies approximately 620m east of the site, and the site is partially located within the non-statutory designated Chiltern Line between the River Brent and Sudbury Hill Site of Importance for Nature Conservation (SINC).
- 3 Figure 1 provides a site location plan. Figure 2 presents the indicative planning application redline boundary.
- 4 The site currently comprises of hardstanding, dense scrub, grassland and bare ground. No buildings are present on the site.
- 5 The planning application will seek full **planning permission** for the construction of two interconnected buildings of up to approximately ground plus 21 and 19 storeys in height which will provide up to 650 new student accommodation units and associated indoor and outdoor amenity space.
- 6 Primary vehicular and pedestrian access will be provided from High Road by a currently unadopted route which runs adjacent to 410 High Road (Access Road).
- 7 Given the nature of the development described, the Proposed Development falls within the classification of Schedule 2, 10(b) (Infrastructure Projects – Urban Development Projects) of the Environmental Impact Assessment (EIA) Regulations¹. Considering the scale of the development and the nature of the site and surrounding area it is considered that there is the potential for significant environmental effects to arise. The Proposed Development is therefore considered to constitute 'EIA Development' under the EIA Regulations, and so an Environmental Statement (ES) will be prepared to accompany the planning application.
- 8 Trium Environmental Consulting LLP (Trium) has been commissioned by the Applicant to prepare an **EIA Scoping Opinion Request** for the redevelopment of the. This involves submitting a Scoping Opinion Request Report (hereafter referred to as the 'Scoping Report') to the LBB to set out the proposed scope of the EIA and the content and approach to preparing the ES that will be submitted to accompany the application for detailed planning permission.

¹ Her Majesty's Stationery Office (HMSO) 2017. *The Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2017 (amended in 2018 and 2020)*.

Figure 1 Site Location Plan



Source: OS Maps (2023)

Figure 2 Indicative Redline Boundary



PURPOSE OF THE REPORT

- 9 This EIA Scoping Report has been prepared to ensure that the subsequent EIA focuses on the impacts which are likely to give rise to significant effects and to agree with the LBB the EIA approach and scope.
- 10 The Scoping Report also identifies the technical topics not considered likely to result in impacts which would be considered significant and as such where no further assessment is required as part of the EIA. Notwithstanding this, various technical reports will accompany the planning application which consider these technical topics further.
- 11 In accordance with paragraph 15. (1), Table 1 sets out the information the EIA Regulations requires a Scoping Report to include and where this can be located within this Scoping Report.

Table 1 Information Required to Accompany a Request for a Scoping Opinion

Information Required	Location within this Report
<i>a plan sufficient to identify the land;</i>	Figure 1, Figure 2, Figure 3
<i>a brief description of the nature and purpose of the development, including its location and technical capacity;</i>	See THE PROPOSED DEVELOPMENT (paragraphs 19-24)
<i>an explanation of the likely significant effects of the development on the environment; and</i>	See PROPOSED EIA SCOPE - ENVIRONMENTAL TOPICS, Annex C and Annex D.
<i>such other information or representations as the person making the request may wish to provide or make;</i>	See Structure of The Scoping Report (paragraphs 12-13)

The Scoping Process

- 12 EIA Scoping forms one of the first stages of the EIA process. Requesting an EIA Scoping Opinion from a local planning authority (in this case the LBB), under Regulation 15 of the EIA Regulations, involves the preparation of an EIA Scoping Opinion Request Report (or EIA Scoping Report) and its submission to the local planning authority is part of a formal request for their opinion on the content or ‘scope’ and approach to the EIA.
- 13 The purpose of scoping is to identify:
 - The important environmental issues and topics for consideration in the EIA;
 - The baseline conditions and assessment methodology to be used for assessment;
 - Any potentially sensitive receptors that may be affected by the development being proposed;
 - The appropriate space boundaries of the EIA: the site boundary and surrounding environmental context;
 - The information necessary for decision-making;
 - The topics of which could result in potential significant effects from the development both during its demolition and construction and operation; and
 - Other schemes/projects that should be considered in relation to potential cumulative effects alongside the Proposed Development.
- 14 In accordance with the requirements of the Town and Country Planning (Development Management Procedure) Order 2015 (article 18, Schedule 4), this Scoping Report will need to be issued by the LBN to the statutory consultees that are considered to have an interest in the EIA of the Proposed Development and should be consulted as part of the EIA Scoping process. This will include the various technical officers within the LBB, statutory bodies such as Historic England, Greater London Archaeological Advisory Service (GLAAS), Environment Agency and Natural England.

- 15 It is expected that the LBB will also issue the Scoping Report to non-statutory and key, local stakeholders and interest groups who are deemed to similarly have an interest in the EIA of the Proposed Development.
- 16 The process of consultation is a key requirement of the EIA process and the views of statutory consultees and other stakeholders help to identify specific issues, as well as identifying additional information in their possession, or of which they have knowledge, which may be of assistance in progressing the EIA.
- 17 The ES will append the EIA Scoping Report (this document) and EIA Scoping Opinion and include a summary of any other consultation undertaken as part of the EIA process.

STRUCTURE OF THE SCOPING REPORT

- 18 This Scoping Report is structured as follows and provides:
 - A description of the site and the location of the site;
 - A description of the surrounding area's environmental context;
 - A description of the Proposed Development and surrounding relevant development;
 - A summary of the Planning Application format;
 - The Proposed EIA scope and summary of the environmental topics that are considered to potentially result in significant effects on the environment and are therefore 'scoped into the EIA'; and those that are considered unlikely to result in significant effects on the environment and are therefore 'scoped out' of the EIA;
 - The proposed structure of the ES; and
 - Request of an EIA Scoping Opinion.
- 19 This Scoping Report is supported by the following Annexes:
 - **Annex A:** Approach to Scoping and EIA Methodology;
 - **Annex B:** Planning Policy Context;
 - **Annex C:** 'Scoped In' Topic Sheets;
 - **Annex D:** 'Scoped Out' Topic Sheets;
 - **Annex E:** Archaeological Desk Based Assessment;
 - **Annex F:** Preliminary Ecological Appraisal & Ecological Impact Assessment;
 - **Annex G:** Phase 1 Preliminary Risk Assessment;
 - **Annex H:** Flood Risk Assessment;
 - **Annex I:** Viewpoint Map; and
 - **Annex J:** Heritage Map.

SITE LOCATION AND DESCRIPTION

- 20 The site, centred at National Grid Reference: TQ18608 85313, falls within the administrative boundary of the LBB. The site (Refer to Figure 2) is located at land north of 390-408 High Road, Wembley (A404). High Road is located approximately 30m south of the site. The site is irregular in shape and contains hardstanding, dense scrub, grassland and bare ground. There are no existing buildings on the site with the exception of two temporary structures (see Figure 3).
- 21 The site is bound by:

- Railway lines associated with Chiltern Railways to the north;
- Hardstanding, scrub and trees to the east;
- Commercial and residential buildings to the south, which is the site of the consented 390-406 High Road (Planning Ref. 22/2225), beyond which is High Road (A404); and
- Wembley Link (Planning Ref. 18/3111), a residential scheme, to the west.

22 The wider character of the surrounding area is dominated by an urban environment. A High Spatial Priority Woodland Improvement Area² is located to the north of the site. The Chiltern Line between the River Brent and Sudbury Hill Site of Importance for Nature Conservation (SINC) is partially located within the site. Vehicular access to the site is provided from High Road by a currently unadopted route which runs adjacent to 410 High Road.

23 There are a range of local public transport facilities within the surrounding area these include Wembley Stadium and Wembley Central railway stations circa 400m and 500m respectively from the site. The railway stations provide access to Chiltern Railways at Wembley Stadium and Southern Railways / London Overground at Wembley Central. The Wembley Central London Underground (LU), serviced by the Bakerloo line, lies approximately 400m west of the site and Wembley Park LU station, serviced by the Jubilee and Metropolitan lines, is also available within a 1.5km walking distance.

Figure 3 Existing Site



ENVIRONMENTAL CONTEXT

24 The area surrounding the site is predominantly comprised of the following key environmental considerations described in Table 2 and shown in Figure 4 below.

Table 2 Surrounding Environmental Context

² London Borough of Brent. Review of Sites of Importance for Nature Conservation <https://legacy.brent.gov.uk/media/16402896/sinc-introduction-methodology.pdf>

Environmental Topic	Environmental Context
Built Heritage	<ul style="list-style-type: none"> There are eight listed buildings (all Grade II) within 1km of the site. The nearest listed building is St Josephs' Church (Grade II), the church is approximately 220m southeast and Wembley High Street Conservation Area is approximately 320m north.
Archaeology	<ul style="list-style-type: none"> No designated World Heritage Sites, Historic Battlefield sites or Historic Wreck sites lie within the vicinity of the surrounding area. There are no Scheduled Monuments within 1km of the site. There are no Archaeological Priority Areas within 1km of the site. The Archaeological Desk Based Assessment (DBA) (Annex E) outlined that the site has a generally low potential to contain prehistoric, Roman or medieval deposits. Any deposits within the site are likely to have been damaged or removed by the 20th century development of the site.
Air Quality	<ul style="list-style-type: none"> An Air Quality Management Area (AQMA) which was declared by the LBB for exceedances of the annual mean nitrogen dioxide (NO₂) and 24-hour particulate matter (PM₁₀) objectives. The AQMA is located across the entirety of the south and east of the LBB with the nearest area not covered by the AQMA being located over 1.5km to the north. The 'Wembley High Road from Ealing Road to Park Lane' air quality Focus Area is located approximately 50m to the east. The Focus Area is one of 187 areas identified by the Greater London Authority (GLA)³ as locations that not only exceed the annual limit value for NO₂, but also have high levels of human exposure.
Ecology and Biodiversity	<ul style="list-style-type: none"> The Chiltern Line between the River Brent and Sudbury Hill Site of Importance for Nature Conservation (SINC) is partially located within the site. A High Spatial Priority Woodland Improvement Area⁴ is located to the north of the site. No internationally protected sites are located within 7km of the Site and Brent Reservoir Site of Special Scientific Interest (SSSI) is located approximately 2.75km north-west. The site lies within an Impact Risk Zone associated with the SSSI. There are no records of previous European Protected Species Licenses (EPS) for bats within 2km of the site. One record for a previous great crested newt EPS was returned, located 1.9km to the north-west of the site and separated from the site by the Chiltern railway line.
Ground Conditions	<ul style="list-style-type: none"> Based on geological mapping, it is anticipated that the site is underlain by Made Ground over London Clay detailed as an Unproductive Aquifer. The site is not within a groundwater Source Protection Zone (SPZ). The site is designated as being at Low Risk from groundwater flooding. Previous contaminative activities associated with the adjacent depot and garage may have resulted in soil contamination which could potentially impact upon human health. Significant groundwater contamination originating from the adjacent site is not anticipated given the presence of underlying Unproductive Aquifer comprising low permeability cohesive material and any mobile phase contamination is unlikely to migrate beyond low permeability strata to deeper groundwater.
Noise and Vibration	<ul style="list-style-type: none"> The existing environmental noise climate at the site is dominated by road traffic noise from the surrounding road network and railway traffic. The Chiltern Railways line, at surface level, that borders the site to the north, runs east to west between Wembley Stadium station and Sudbury & Harrow Road station. The railway line is the key environmental vibration source considered for the Proposed Development. Nearby sensitive receptors include the consented schemes 390-406 Wembley High Road (Planning Ref. 22/2225), Ujuma House, 388 High Road (Planning Ref. 19/3092), Wembley Link (Planning Ref. 18/3111) and Land at Juncture of Cecil Ave & High Road (Planning Ref. 19/2891), in addition to existing mixed residential and commercial premises on High Road, Lanmore House and Best Western Hotel.
Traffic and Transport	<ul style="list-style-type: none"> The site has a Public Transport Accessibility Level (PTAL) of 6a (with 6b the highest level) indicating very good accessibility to public transport.

³ Air quality Focus Areas are locations with high levels of human exposure where the EU annual mean limit value for nitrogen dioxide is exceeded.

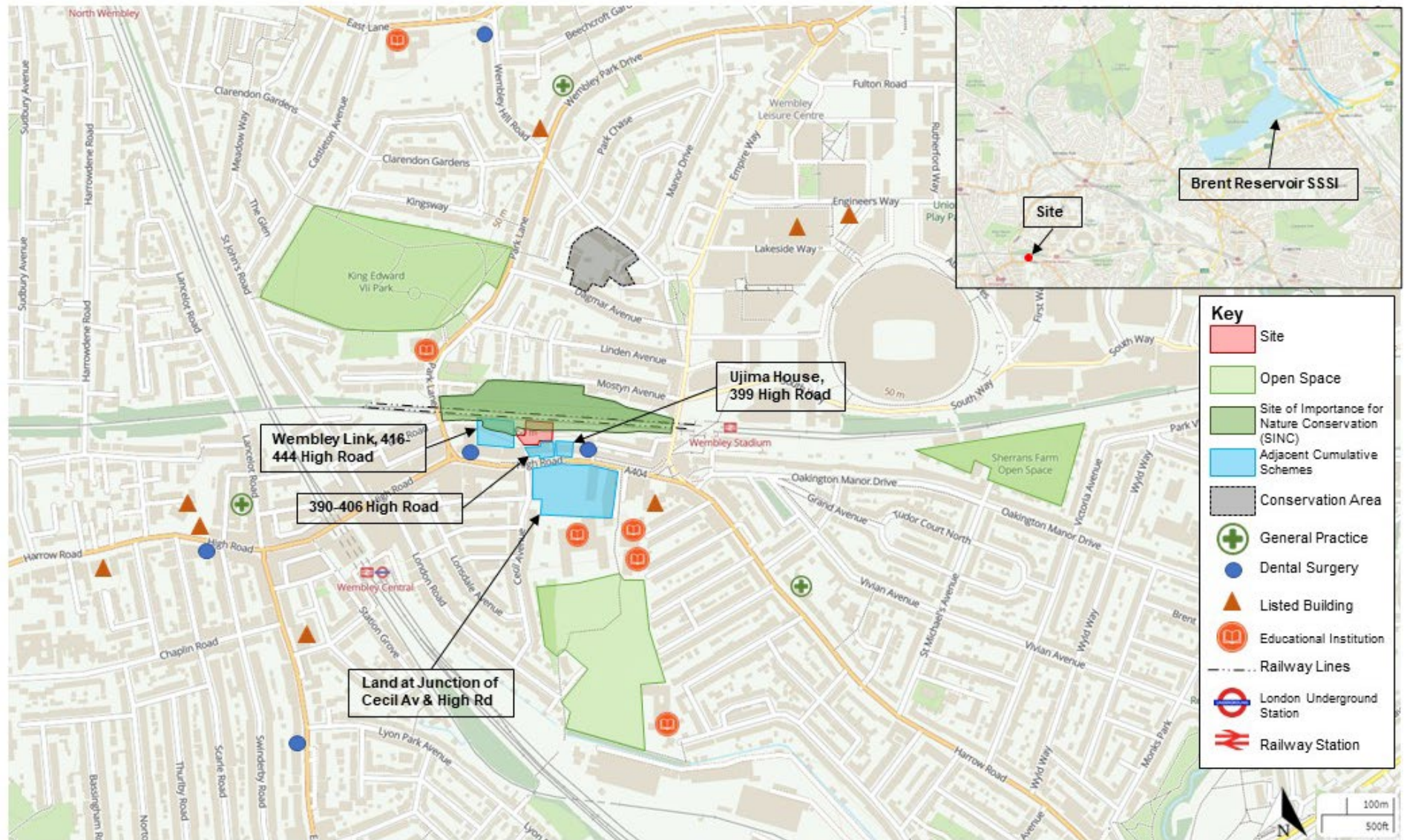
⁴ London Borough of Brent. Review of Sites of Importance for Nature Conservation <https://legacy.brent.gov.uk/media/16402896/sinc-introduction-methodology.pdf>

Environmental Topic	Environmental Context
	<ul style="list-style-type: none"> Wembley Stadium rail station is located approximately 300m east of the site and is serviced by Chiltern Railways. Wembley Central rail station is located approximately 400m south-west of the site and is serviced by Southern Railways and London Overground. Wembley Central London Underground station is also located at the rail station and is serviced by the Bakerloo line. Wembley Park London Underground Station is located approximately 1.3km north-east of the site and is serviced by the Jubilee and Metropolitan lines. There are a number of bus stops located along High Road, the nearest of which is Cecil Avenue Stop SP, serviced by No. 18, 92, 182 and N18, located approximately 60m south of the site. Further bus stops are available on Park Lane and Wembley Hill Road. These bus stops provide access to a high number of bus services providing frequent buses to a range of destinations. London Cycle Network 45 runs along High Road, providing a route between Wealdstone (London Borough of Harrow) and the north bank of the Battersea Bridge (Royal Borough of Kensington and Chelsea).
<p>Townscape and Visual</p>	<ul style="list-style-type: none"> Townscape character: The site and its study area are located within the National Character Area: 111 Northern Thames Basin. At a regional level it is located within the Landscape Character Type 3 Barnet Plateau of the London's Natural Signatures: The London Landscape Framework. The site forms part of the larger BSWSA8 – Wembley High Road Site Allocation as described in the Brent Local Plan 2019-2041⁵. The site and its surrounds are allocated for mixed-use residential led development incorporating main town centre uses and an increase in industrial floorspace (see Figure 5). The study area is characterised by built form which varies in typology, scale, footprint and land use (which includes residential, commercial, industrial, leisure and community land-uses) The site's location is part of this emerging high street route which is evolving into a more complex high street network with secondary routes and spaces. Other taller buildings exist in the immediate context, including the 26-storey UNCLE Wembley development (approximately 150m west) and a large number of taller buildings set around Wembley Stadium forming Wembley Masterplan (Planning Ref. 15/5550), at its closest point 400m northeast of the site. The site is not located within a Landmark Viewing Corridor identified by the London View Management Framework (LVMF)⁶.
<p>Waste</p>	<ul style="list-style-type: none"> The West London Waste Authority (WLWA) acts as the local waste authority for the LBB, Ealing, Harrow, Hillingdon, Hounslow and Richmond Upon Thames.
<p>Water Resources and Flood Risk</p>	<ul style="list-style-type: none"> The Environment Agency's (EA) indicative flood map indicates that the site lies in Flood Zone 1 (lowest risk) and therefore has a likelihood of flooding by river or sea of less than 0.1% in any given year and is not located within 250m of any surface water features. The EA's online pluvial maps, shows the risk of potential surface water inundation or flooding at the site is considered very low risk. A review of publicly available information contained on the British Geological Survey's (BGS) website indicates the site is likely underlain by London Clay Formation to a depth of over 15m. Due to the impermeable nature of this strata, groundwater flooding is considered to be low risk. Mapping produced in support of the West London Strategic Flood Risk Assessment's (SFRA) also shows the site is not located in an area of potential elevated groundwater.

⁵ London Borough of Brent (LBB), (2022); Brent Local Plan

⁶ GLA (2012). <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs/london-view-management>

Figure 4 Environmental Context Map



Source: OS Maps (2023)

THE PROPOSED DEVELOPMENT

- 25** The Applicant is seeking planning permission for the construction of two student blocks which will be up to ground plus 21 and 19 storeys in height, with a shared part single storey basement level, which will contain student accommodation housing providing:
- Up to 650 units of student accommodation (Sui Generis) alongside associated shared student amenities and wider communal uses;
 - Lower ground level, which will be part basement;
 - A podium garden at first floor level located centrally to both buildings providing external amenity for students;
 - Bin store, plant, Back of House (BOH), cycle parking; and
 - Associated ground floor landscaping.
- 26** The student accommodation buildings will comprise a range of accommodation types within cluster and studio style accommodation. Room types will include double bedrooms with access to communal living / kitchen areas, alongside studios which comprise double ensuite bedrooms with private kitchen and larger double ensuite bedrooms with private kitchens.
- 27** The lower ground level is proposed to contain plant and cycle parking and is to be located below both buildings. The ground floor will contain indoor student amenity space, BOH and utility space. The first floor will contain two large sections of indoor student amenity in addition to cluster accommodation. The remaining floors from second floor level upwards will likely contain student accommodation units (Sui Generis Use) and indoor student amenity. A podium garden at first floor level will be provided and will be accessible by student residents of the buildings.
- 28** The Proposed Development is also to be supported by a roof-mounted Air-Source Heat Pumps (ASHP) systems for the provision of heat and hot water, supplemented by a back-up emergency diesel generator.
- 29** Both hard and soft landscaping will form part of the Proposed Development. Landscaping will feature at ground floor level and along the southern and eastern boundaries. Further landscaping will be included at terrace level. Additionally, the Proposed Development will extend the east to west green link that runs between Chesterfield House to Ujima House, in accordance with the wider aspirations of the sites Strategic Allocation.
- 30** Access to the Proposed Development will be from the existing access road off the High Road (A404) for pedestrian, cyclists and delivery / servicing vehicles (as required). This access road services both the Proposed Development as well as the adjacent 390 – 406 Wembley High Road.

BSWSA8 – WEMBLEY HIGH ROAD SITE ALLOCATION

- 31** The site forms part of the larger BSWSA8 – Wembley High Road Site Allocation (see Figure 5) as described in the Brent Local Plan 2019 – 2041. The site and its surrounds are allocated for mixed-use residential led development incorporating main town centre uses and an increase in industrial floorspace.
- 32** There are three planning applications with permission granted (subject to discharge of conditions) located within site allocation BSWSA8 (Ujima House (Planning Ref: 19/3092), Wembley Link – Phase 2 (Planning Ref: 18/3111) and 390-406 Wembley High Road (Planning Ref: 22/2225) which form part of the larger BSWSA8 – Wembley High Road Site Allocation. These schemes are illustrated in Figure 6.

Figure 5 BSWA8 – Wembley High Road Site Allocation Boundary

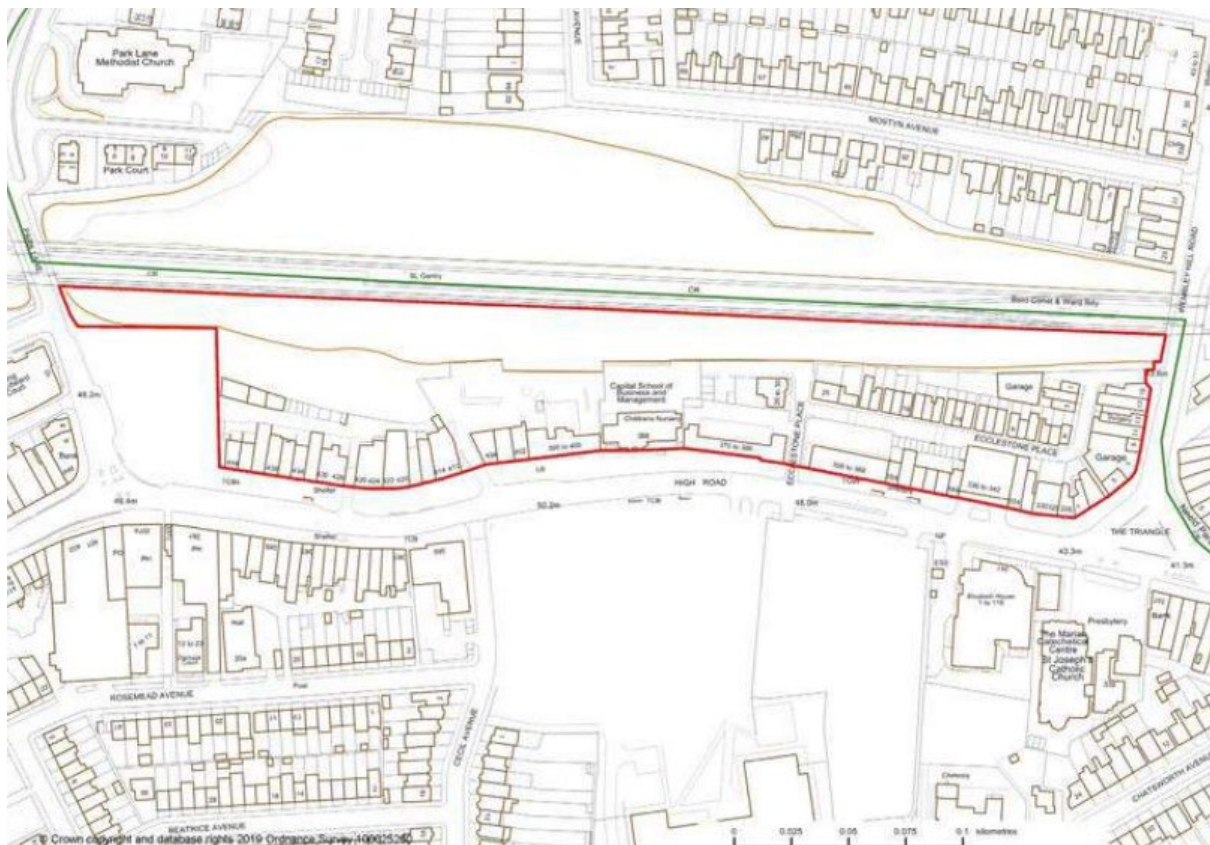
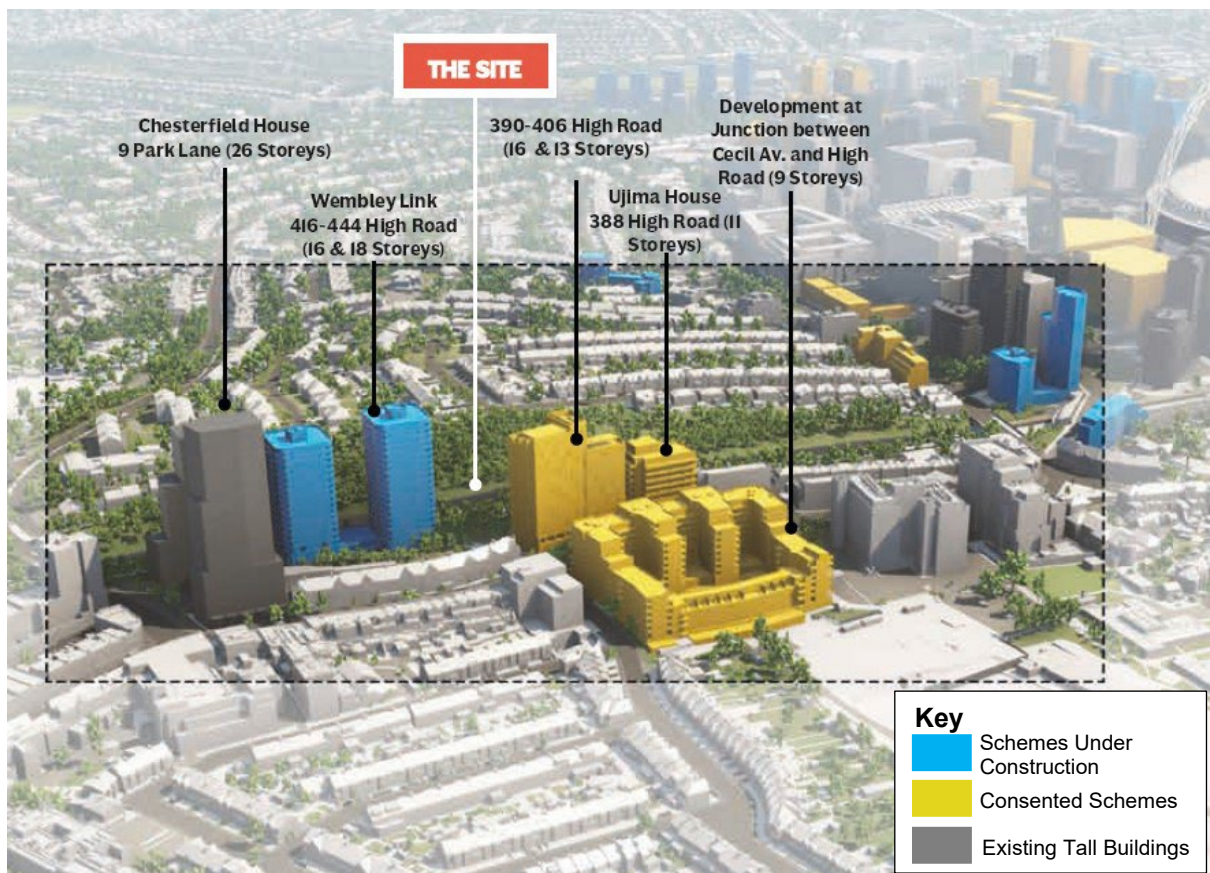


Figure 6 Consented Schemes Within Site Allocation



THE PLANNING APPLICATION

- 33** The Applicant intends to submit a detailed planning application to the LBB for the Proposed Development, as described within **THE PROPOSED DEVELOPMENT** section above.
- 34** This planning application will include the following information which the technical assessments within the ES will be based on:
- Detailed Drawings;
 - 3D Model;
 - Floor Plans;
 - Elevation Plans; and
 - The Proposed Developments ‘use class’ area schedule.
- 35** In addition to the above, the technical assessments will consider enabling works and construction information including the likely construction methodologies and programme.
- 36** The ES will present a description of the Proposed Development, in terms of the detailed design sought for approval. Sufficient information will be presented to enable the assessment of potential impacts and likely significant effects of the completed and occupied development. Any assumptions made will be clearly presented in the narrative.
- 37** Further detail on the relevant planning policy guidance followed through this EIA Scoping Report as well as within the ES can be found within **Annex B: Planning Policy Context**.

Planning Application Supporting Documents

- 38** A number of technical reports will be prepared to accompany the planning application (in addition to a number of other planning documents) and include the following:
- Planning Statement (including Student Demand Assessment);
 - Socio-Economic Assessment;
 - Drawing Schedule, existing and proposed plans and site location plan;
 - Design and Access Statement;
 - Transport Assessment (including a Framework Travel Plan, and Delivery and Servicing Plan);
 - Outline Construction Logistic Plan;
 - Circular Economy Statement;
 - Air Quality Assessment (including Air Quality Positive Assessment);
 - Ecological Impact Assessment (including relevant protected species surveys and reports/Biodiversity Net Gain Calculation);
 - Wind Report (CFD);
 - Contamination & Ground Conditions Report;
 - Energy Statement;
 - Sustainability Statement;
 - Overheating Assessment;
 - BREEAM Assessment;
 - Fire Statement (including a Gateway 1 Proforma);

- Draft Student Management Plan;
- Health Impact Assessment;
- Heritage and Townscape Visual Impact Assessment;
- Desk Top Archaeological Impact Assessment;
- Arboricultural Impact Assessment (including Arboricultural Method Statement);
- Foul Sewage & Utilities Assessment;
- Flood Risk Assessment;
- Drainage Strategy;
- Daylight and Sunlight Assessment (internal);
- Statement of Community Involvement;
- Whole Carbon Lifecycle Assessment;
- Landscape Statement (Including Urban Greening Factor) and
- Financial Viability Assessment.

39 Input from the technical consultants preparing these assessments has been sought throughout the EIA Scoping process.

PROPOSED EIA SCOPE - ENVIRONMENTAL TOPICS

40 The following table sets out the proposed scope of the EIA. Table 3 provides a summary of those topics where significant effects as a result of the Proposed Development are likely, and also where it is unlikely that there will be significant environmental effects. Detailed explanation of those topics which are proposed to be ‘scoped in’ and ‘scoped out’ of the EIA are provided within **Annex C, Annex D** and of this EIA Scoping Report respectively.

41 Table 3 also provides a description of any additional assessment which will accompany the planning application as described above at **Planning Application Supporting Documents**. Further details in regard to these assessments is provided within the accompanying Topic Sheets (**Annex C, Annex D**).

Table 3 Environmental Topics: EIA Scope

Topic	‘Scoped Into’ the EIA ✓ ‘Scoped Out’ of the EIA ✗		Additional Assessments to accompany the Planning Application
	Construction	Completed Development	
Socio Economics	x	x	N/A
Human Health	x	x	Health Impact Assessment
Traffic and Transport	x	x	Transport Assessment Outline Construction Logistic Plan Refer to Topic Sheet (Located within Annex D)
Air Quality	x	x	Air Quality Assessment (Including an Air Quality Neutral Assessment and Air Quality Positive Statement) Refer to Topic Sheet (Located within Annex D)
Climate Change And Greenhouse Gases	x	x	Whole Life Carbon Assessment Energy Statement

Topic	'Scoped Into' the EIA ✓ 'Scoped Out' of the EIA ✗		Additional Assessments to accompany the Planning Application
	Construction	Completed Development	
			Overheating Assessment Sustainability Statement Refer to Topic Sheet (Located within Annex D)
Noise & Vibration	✓	✗	Noise and Vibration Impact Assessment Refer to Topic Sheet (Located within Annex C)
Ground Conditions and Land Contamination	✗	✗	Contamination & Ground Conditions Report Refer to Topic Sheet (Located within Annex D) Refer to Phase 1 Preliminary Risk Assessment (Located within Annex G)
Daylight, Sunlight and Overshadowing	✓	✓	Refer to Topic Sheet (Located within Annex C)
Solar Glare	✗	✗	
Light Pollution	✗	✗	
Wind Microclimate	✗	✗	Wind Report (CFD) Refer to Topic Sheet (Located within Annex D)
Heritage Townscape and Visual Impact Assessment	✗	✗	Refer to Topic Sheet (Located within Annex D)
Archaeology	✗	✗	Refer to Topic Sheet (Located within Annex D) Refer to Archaeological Desk Based Assessment (Located within Annex E)
Arboriculture	✗	✗	Arboricultural Impact Assessment
Ecology and Biodiversity	✗	✗	Biodiversity Net Gain Calculation Refer to Topic Sheet (Located within Annex D) Refer to Preliminary Ecological Appraisal (Located within Annex F) Refer to Ecological Impact Assessment (Located within Annex F)
Waste	✗	✗	N/A
Water Resources, Flood Risk and Drainage	✗	✗	Drainage Strategy Refer to Flood Risk Assessment (Located within Annex H)
TV and Radio Interference	✗	✗	N/A

EIA Assessment Scenarios

42 The assessment scenarios to be assessed within the Technical ES Chapters are as outlined below and will be defined within each respective Technical ES Chapter.

- 43 The standard assessment scenarios to be included within the Technical ES Chapters include the following scenarios:
- **Baseline Conditions 2023:** Reflecting the existing baseline conditions on the site and within the surrounding area;
 - **Enabling Works and Construction:** An assessment of potential enabling works and construction effects associated with the Proposed Development against baseline conditions; and
 - **Fully Complete and Operational:** An assessment of potential effects when the Proposed Development is completed and operational against baseline conditions.
- 44 Where relevant these ES chapters will assess the following:
- **Peak Construction:** An assessment of the peak construction period in terms of peak construction activities against baseline conditions; and/or
 - **Future Baseline Year:** An assessment of a future baseline year(s) against baseline conditions which take into consideration future growth in relation to the surrounding area when the Proposed Development is first occupied and/or when completely built and operational.
- 45 As described above under **BSWSA8 – WEMBLEY HIGH ROAD SITE ALLOCATION** there are a number of planning applications and consent within the immediate vicinity of the site of the Proposed Development. The EIA will consider the potential for significant cumulative effects with surrounding cumulative schemes.
- 46 Due to the proximity to 390-406 Wembley High Road (Planning Ref: 22/2225) immediately to the south, the potential for significant cumulative effects will be considered with the Proposed Development. All remaining cumulative schemes will then be considered in combination with the Proposed Development and 390-406 Wembley High Road (Planning Ref: 22/2225). The following section describes the criteria used to determine which cumulative schemes will be considered as part of the EIA.

Cumulative Effects Assessment

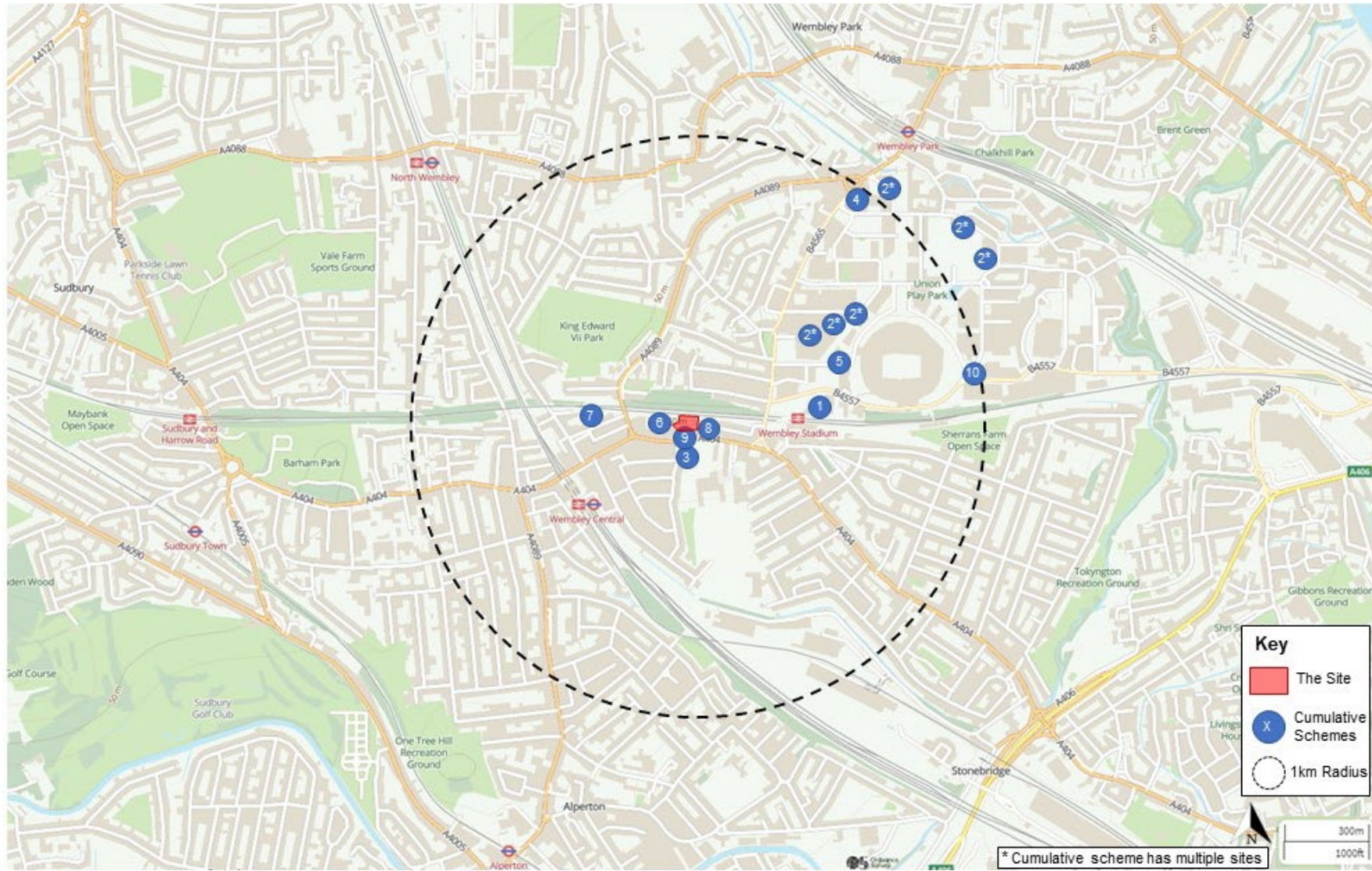
- 47 The EIA Regulations require that, in assessing the effects of a particular development proposal, consideration should also be given to the likely significant effects arising from the “*cumulation with other existing and/or approved projects*” (Schedule 4, 5(e)).
- 48 The cumulative assessment is to be based on the information available on the local authorities planning register. Generally, the schemes (referred to as ‘cumulative schemes’) to be included within the cumulative effects assessment will be within 1km of the site and either have:
- Full planning consent; **OR** A resolution to grant consent;
- AND:**
- An uplift of more than 10,000 square meters GEA of mixed-use floorspace or, provide over 150 residential units; **OR**
 - Office to residential conversions (granted under the General Permitted Development Order) giving rise to over 150 residential units.
- 49 These parameters have been set to allow all the relevant schemes coming forward within the area of the site to be subject to an initial screening exercise to determine the schemes that, based on the scale of development (amount and mix of uses) and location relevant to the site, could potentially have a cumulative effect with the Proposed Development and should be considered further within the cumulative effects assessment of the EIA. The cumulative schemes assessed are listed in Table 4 and displayed in Figure 7 below.

- 50 Cumulative schemes which are located in proximity to the site of the Proposed Development have been considered as part of the baseline / future baseline to consider a worst case scenario in terms of future potential sensitive receptors. These schemes are noted in *italics* below.

Table 4 Cumulative Schemes List

Cumulative Scheme	Planning Application Reference Number	Distance	Status
Land Surrounding Wembley Stadium Station, South Way, Wembley.	14/4931	550m NE	Some of the buildings are complete and operational, others are still under construction. Permission Granted: 23 rd December 2016.
Wembley Masterplan	15/5550	400m – 1km NE	A number of elements of the outline application are complete and operational whilst others are yet to begin construction. Permission Granted: 23 rd Dec 2016.
<i>Land at Juncture of Cecil Ave & High Road, HA9</i>	19/2891	40m S	Construction has not yet started. Planning Permission Granted: 5 th February 2021.
Fulton Quarter - Stadium Retail Park + Fountain Studios 128 Wembley Park Drive Olympic Way.	17/3059	1km NE	Construction has not yet started. Planning Permission Granted: 1 st February 2021
Red House building, South Way, Land and Pedestrian walkway between South Way and Royal Route, Wembley Park Boulevard, Wembley	15/3599	500m NE	Construction has not yet started. Planning Permission Granted: 27 th Jul 2016
<i>Wembley Link, Land, garages, alleyway rear of 416-444, High Road, Wembley, HA9</i>	18/3111	50m NW	The site has been cleared; construction has started. Planning Permission Granted: 6 th April 2020.
1-7, 9, 11 & 11A Elm Road, Wembley, HA9 7JA	18/1592	420m W	Construction has not yet started. Planning Permission Granted: 17 th October 2018.
<i>Ujima House, 388 High Road, Wembley, HA9 6AR</i>	19/3092	Adjacent E	Construction has not yet started. Planning Permission Granted: 5 th February 2021.
<i>390-406, High Road, Wembley, HA9</i>	22/2225	Adjacent S	Construction has not yet started: Planning Permission Granted: 16 th November 2022
Access Storage, First Way, Wembley, HA9 0JD	18/4764	1km E	Construction not yet started: Planning Permission Granted: 30 th March 2023

Figure 7 Cumulative Schemes Map



Source: OS Maps (2023)

Environmental Topics Scoped Out

- 51 There are a number of environmental topic areas defined by Article 3(1) of EU Directive 2014/52/EU and as such the EIA Regulations for which it is considered an assessment as part of the EIA is not justified as significant effects on the environment are unlikely, and therefore shall not be considered further as part of the EIA.
- 52 In combination with an understanding of the site sensitivities, professional judgement on the EIA requirements for each topic and the design evolution of the scheme, this section defines those topics in which significant effects as a result of the Proposed Development is considered unlikely. This judgement also takes into consideration additional environmental assessments which will accompany the planning application in accordance with the LBB validation requirements. As such, where relevant topics which are proposed to be scoped out may be considered as part of a standalone planning report.
- 53 The topic areas which are proposed to be scoped out of the EIA are as follows:
 - Arboriculture;
 - Human Health;
 - Ecology and Biodiversity;
 - Ground Conditions and Contamination;
 - Water Resources, Flood Risk and Drainage;
 - Traffic and Transport;
 - Air Quality;
 - Climate Change and Greenhouse Gases;
 - Noise and Vibration (Operational);
 - Heritage and Townscape, Visual Impact Assessment (HTVIA);
 - Archaeology;
 - Solar Glare, and Light Pollution;
 - Wind Microclimate;
 - Waste;
 - Socio-Economics;
 - TV and Radio Interference; and
 - Project Vulnerability.
- 54 The justification for each environmental technical proposed to be scoped out of the EIA is provided below within Table 5 which includes Water Resources, Flood Risk and Drainage, Waste, Socio-Economics, Human Health, Arboriculture, Project Vulnerability and TV and Radio Interference. Further justification for topics in which additional assessment has been provided at the EIA Scoping stage as part of this report is provided within **Annex D**.

Table 5 Environmental Topics to be Scoped Out

Environmental Topic	Sensitive Receptors / Site Sensitivities	Discussions for Scoping Out
TV and Radio Interference	Sensitive receptors include existing and future residents near to the site.	Since the replacement of analogue TV with digital TV, there has been a reduced need to assess signal interference from introduced massing as digital TV signals are less prone to interference than analogue.

		<p>A review of Ofcom’s mobile availability checker⁷ has identified that 4G mobile services for four network providers (EE, O2, Vodaphone and Three) are available within and in close proximity to the site. In addition to this, mobile phone reception interference is unlikely to be affected in the site locality due to the lack of surrounding tall buildings which have the ability to interfere with mobile phone reception.</p> <p>Due to radio signals being at lower frequencies, they can ‘bend’ to a greater extent around buildings (or other obstructions) when compared to TV signals. Radios are also able to make constructive use of reflected signals. As such, radio signals are able to operate successfully in dense urban settings (i.e. containing a large density of tall and large buildings) and therefore radio reception (both analogue and digital) is not considered to be at risk of degradation as a result of the Proposed Development. No likely significant effects to radio reception (both analogue and digital) are therefore anticipated as a result of the Proposed Development.</p> <p>In addition, best practice recognises that telecommunication issues do not normally constitute environmental effects and that such issues can be dealt with by way of standard planning conditions. Considering the above, no significant environmental effects with regards to TV / radio reception.</p>
<p>Project Vulnerability</p>	<p>Future site users and surrounding human and environmental receptors</p>	<p>Paragraph 8 of Schedule 4 of the EIA Regulations (as amended) provides a description of the information to be provided in the ES in relation to these events. In line with this description, this information is of key importance for the assessment of major industrial and/or infrastructure schemes which could pose significant risks to society and the environment in the event of a major accident or a natural disaster which would impede its normal function (e.g. nuclear / petrochemical installations, major transport infrastructure such as tunnels, bridges or airports, etc.). While the Proposed Development does not fall into these scheme categories, the project’s vulnerability to such events has nevertheless been taken into consideration in order to ascertain the potential risks to future site users and surrounding human and environmental receptors.</p> <p>New guidance has recently been made available (IEMA Major Accidents and Disasters in EIA: A Primer⁸) which has clarified the definitions of major accidents and disasters to the following:</p> <ul style="list-style-type: none"> • Disaster – “may be a natural hazard (e.g., earthquake) or a man-made/external hazard (e.g., act of terrorism) with the potential to cause an event or situation that meets the definition of a major accident”; and • Major accident as “events that threaten immediate or delayed serious environmental effects to human health, welfare and/or the environment and require the use of resources beyond those of the client or its appointed representatives to manage. Whilst malicious intent is not accidental, the outcome (e.g., train derailment) may be the same and therefore many mitigation measures will apply to both deliberate and accidental events”. <p>As noted in the guidance, a development should first be screened to determine its potential to result in likely significant effects from major accidents and natural disasters. The following questions are posed to help determine a view on this:</p> <ul style="list-style-type: none"> • “Is the development a source of hazard itself that could result in a major accident and/or disaster occurring?” • Does the development interact with any sources of external hazards that may make it vulnerable to a major accident and/or disaster? • If an external major accident and/or disaster occurred, would the existence of the development increase the risk of a significant effect to an environmental receptor occurring?”

⁷ Ofcom. Mobile and Broadband Checker. Accessed online 104.05.2023 [URL: <https://checker.ofcom.org.uk/mobile-coverage>]

⁸ IEMA, 2020, Major Accidents and Disasters in EIA: A Primer.

		<p>In line with the above questions, given its intended scale and uses, it is considered the Proposed Development would be unlikely to result in significant effects from all major accidents and natural disasters. The Proposed Development is student accommodation and is not a source of hazard itself nor does it interact with any sources of external hazards that make it vulnerable to a major accident or disaster.</p> <p>The guidance further states that:</p> <p>“Not all potential events will fall into the scope of a major accidents and/or disasters assessment. The level of risk therefore needs to be defined to inform what types of events are within the scope of the major accidents and/or disasters assessment”.</p> <p>In some cases, this risk management process will be further supported with project-specific information and assessments which form part of the EIA and the wider planning process.</p> <p>As such, considering the above definitions and considerations an assessment of the Proposed Development’s vulnerability to major accidents and natural disasters has been screened out of requiring assessment in the EIA.</p>
Arboriculture	Existing trees within and surround the site	<p>The Proposed Development’s environmental effects in relation to Arboriculture will be assessed as part of a standalone Arboricultural Impact Assessment (AIA) which will be prepared and submitted as a technical report alongside the planning application.</p> <p>Any arboricultural impacts will be assessed within the AIA and appropriate mitigation, if required, will be identified and secure through the landscape design or planning condition. As a result, there is limited potential for significant effects in relation to this topic and is proposed to be scoped out of the EIA.</p>
Human Health	Sensitive receptors within and surrounding the site including existing and future residents, potential vulnerable groups exposed to / access to, air quality, noise, transport, outdoor space, fast food, income deprivation, crime and education facilities.	<p>The Proposed Development’s environmental effects in relation to human health will be assessed as part of a standalone Health Impact Assessment (HIA) which will be prepared and submitted as a technical report alongside the planning application. Human Health is ‘scoped out’ of the EIA however potential effects associated with this topic would be considered throughout each of the relevant technical assessment and a standalone Human Health ES chapter is not proposed. This is to avoid duplication of effects as presented within the technical assessments within the ES.</p> <p>A Health Impact Assessment (HIA), benefits from being a standalone and comprehensive document. The HIA will consider effects as presented within the ES in further detail. This allows the HIA to follow the NHS Healthy Urban Planning Checklist (HUDU) format which does not typically fit into the ES chapter methodology structure.</p> <p>Considering the above, it is concluded that the Proposed Development is unlikely to give rise to significant residual effects with respect to health, with any potential health effects either being assessed within the HIA or standalone planning application reports. In addition, any mitigation relating to enabling and construction addressing issues related to health (including public safety, noise and vibration controls and air and dust management) will form part of a CEMP and measures will be presented within the Environmental Management, Mitigation and Monitoring Schedule ES chapter where relevant.</p>
Socio-Economics	Sensitive receptors within and surround the site include existing and future residents, businesses, and public facilities.	<p>The Proposed Development’s environmental effects in relation to Socio-Economics will be assessed as part of a standalone Socio-Economic Assessment which will be prepared and submitted as a technical report alongside the planning application.</p> <p>The construction of the Proposed Development would provide some temporary local employment opportunities, as would be expected for a development of this type. There would be construction jobs supported during the enabling works and construction phases of the Proposed Development, which is beneficial, but, in the context of mobility of construction workers across London and level of existing employment in the London Borough of Brent, unlikely to be significant.</p> <p>Once complete and occupied, the Proposed Development would provide student accommodation housing in the local area. This new resident student population within the Proposed Development would result in some increased spending in the local area. This effect whilst positive, would be unlikely to be significant in terms of</p>

		<p>the local economy. Although it is not expected that the site would produce an increased child yield by nature of the studio clustered student accommodation, a review of the local primary and secondary schools indicates they have capacity, GP's also show capacity. Therefore, effects on social infrastructure are not expected to be significant.</p> <p>The quantum of operational jobs created at the Proposed Development is expected to be very small relative to existing levels of employment in the LBB but would be beneficial. Based on this minor contribution, effects on operational employment are not anticipated to be significant.</p> <p>Consideration has been given to the operational health implications of the Proposed Development - health has been inherently considered under a number of topics within this Request for an EIA Scoping Report, namely the air quality assessment, noise & vibration assessment, within the implementation of the mitigation measures referenced in the relevant sections of this report, no significant effects are anticipated.</p>
<p>Waste</p>	<p>The construction and operational of the Proposed Development are unlikely to generate significant quantities of waste arisings.</p>	<p>The West London Waste Authority (WLWA) acts as the local waste authority for the LBB, Ealing, Harrow, Hillingdon, Hounslow and Richmond Upon Thames. The current West London Waste Plan⁹ 2015 (also including the Old Oak and Park Royal Development Corporation) provides an assessment of existing and future waste processing capacity against estimated generation of waste within the area. Though capacity gaps are predicted based on the currently available facilities, additional waste management sites have been identified and with the implementation of the West London Waste Plan, the area would achieve net self-sufficiency by the end of the plan period. Sufficient land has been allocated for new waste management sites, and it is assumed the operation of these sites will reflect the future processing methodologies required.</p> <p>The clearing of hardstanding on the site will inevitably generate waste, however works will be conducted in accordance with the controls set out within a CEMP and a SWMP which will be conditioned via a planning condition. This would ensure that waste is managed in line with relevant legislation and best practice to maximise reuse and recycling.</p> <p>In terms of operational waste, the Proposed Development will provide sufficient space for the storage of segregated general and recyclable waste, in accordance with local policy. In addition, the servicing relating to the facilities management of the Proposed Development would ensure that adequate waste collection occurs, as necessary.</p>
<p>Water Resources, Flood Risk and Drainage</p>	<p>The EA Surface Water Flood Map and Indicative Flood Map indicates that the site lies in an area with very low risk of flooding from both surface water and sea and river.</p>	<p>The Environment Agency's (EA) indicative flood map indicates that the site lies in Flood Zone 1 (lowest risk) and therefore has a likelihood of flooding by river or sea of less than 0.1% in any given year and is not located within 250m of any surface water features.</p> <p>The EA's online pluvial maps, shows the risk of potential surface water inundation or flooding at the site is considered very low risk.</p> <p>A review of publicly available information contained on the British Geological Survey's (BGS) website indicates the site is likely underlain by London Clay Formation to a depth of over 15m. Due to the impermeable nature of this strata, groundwater flooding is considered to be low risk. This aligns with the Phase 1 Preliminary Risk Assessment (PRA) (see Annex G) carried out by Milvum which states the underlying strata is London Clay.</p> <p>Mapping produced in support of the West London Strategic Flood Risk Assessment's (SFRA) also shows the site is not located in an area of potential elevated groundwater.</p> <p>Attenuated drainage will be adopted at the site, primarily by below ground attenuation structures supported by blue / green roofs where practicable. The site is not located in a critical drainage area and flow controls will limit the discharge of the Proposed development in line with local guidance. The rate will be agreed with both the Lead Local Flood Authority (LLFA) at Brent Council</p>

⁹ London Borough of Brent et, al., (2015) West London Waste Plan [online] Available: <https://legacy.brent.gov.uk/media/16402581/west-london-waste-plan.pdf>

		<p>and Thames Water, although it's anticipated to be controlled to <2l/s.</p> <p>The Proposed Development will also use a separate foul water system designed to Building Regulations Part H and discharging to the foul water sewer. This is to be confirmed with Thames Water.</p> <p>As part of site enabling and construction activities the contractor will be required to produce an appropriate project specific CEMP, which will be implemented prior to and during the construction phase of the Proposed Development. The CEMP will include appropriate measures to manage any discharges of water from the site, such as silt capture techniques, protective coverings on stockpiles, provision of spill kits, bunded perimeters around construction areas and fuel storage and locating refuelling areas away from the road. Significant effects on water quality during the enabling and construction works are therefore not considered likely.</p> <p>As such, significant effects associated with flood risk, drainage, and water quality during construction of the Proposed Development are not considered to be likely, either in relation to the site itself or, at offsite locations.</p> <p>The planning application will be accompanied by a Drainage Strategy which will provide an operational and maintenance strategy for the below ground drainage.</p> <p>A site-specific Flood Risk Assessment is not required for the planning application; however, a flood risk assessment has been prepared (see Annex H) which confirms the risk of flooding is very low from all sources.</p>
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Environmental Topics Scoped In

- 55 It is considered that there is the potential for likely significant effects relating to **Daylight, Sunlight and Overshadowing** when the Proposed Development is complete and operational, and therefore this topic has been scoped into the EIA.
- 56 Additionally, it is considered that there is the potential for likely significant effects from the construction activities of the Proposed Development in regard to **Noise and Vibration**. As such this topic has been scoped into the EIA.

PROPOSED STRUCTURE OF THE ES

- 57 The proposed scope and structure of the ES is as follows:
 - **ES Volume 1: Main ES** – a document which forms the main body of the ES and which comprises of the following non-technical and technical chapters:
 - Chapter 1. Introduction, EIA Methodology, Alternatives and Design Evolution, The Proposed Development and Enabling Works and Construction;
 - Chapter 2. Noise and Vibration;
 - Chapter 3. Daylight, Sunlight and Overshadowing;
 - Chapter 4. Effect Interactions and Likely Significant Effects;
 - Chapter 5. Environmental Management, Mitigation and Monitoring Schedule; and
 - **ES Volume 2: Technical Appendices** – comprises background data, technical reports, tables, figures and surveys.
 - **ES Non-Technical Summary (NTS)** - this will be a separate document providing a concise description of the Proposed Development, the alternatives considered, any identified mitigation measures and the residual likely significant environmental effects.

REQUEST FOR AN EIA SCOPING OPINION

- 58 This Report requests a Scoping Opinion of the LBB pursuant to Regulation 15 of the EIA Regulations.

- 59** The EIA Scoping Report suggests a comprehensive scope of work based on previous experience of the assembled team of specialists and existing knowledge of the site. The LBB and consultees are invited to consider the contents of this Report and comment accordingly within the five-week period prescribed by the EIA Regulations.



Annex A: Approach to Scoping and EIA Methodology

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ANNEX A

APPROACH TO SCOPING AND EIA METHODOLOGY

1. Use of Competent Experts

Trium Environmental Consulting LLP (Trium) has been commissioned by the Applicant to prepare a request for an EIA Scoping Opinion for the redevelopment of the site in line with the requirements of the EIA Regulations and relevant EIA guidance.

This includes submitting an EIA Scoping Opinion Request Report (hereafter referred to as the 'EIA Scoping Report') to the local authority that sets out the proposed scope of the EIA and the content and approach to preparing the ES that will be submitted to accompany the planning application.

The EIA Regulations require that in order to ensure the completeness and quality of the ES, '(a) the developer must ensure that the environmental statement is prepared by competent experts' and '(b) the environmental statement must be accompanied by a statement from the developer outlining the relevant expertise or qualifications of such experts'. Trium considers that these requirements are equally important and relevant to the EIA scoping process in addition to the preparation of the ES. As such, in accordance with this requirement, the following statement is provided:

“Trium is an environmental consultancy specialising in urban regeneration and property development projects in the UK. Trium’s partners and employees have extensive experience in managing the environmental issues and impacts surrounding large scale, high profile urban regeneration development projects. The partners and employees of Trium have, over the course of their careers to date (including with former employers), project directed, managed or contributed to over 500 EIAs within the retail, residential, leisure, commercial, cultural, infrastructure and industrial sectors. Trium’s lead EIA practitioners for this project have over 10 and 17 years of EIA experience, predominantly focussing on major urban regeneration projects.”

Information on Trium’s lead EIA practitioners (partner and project manager), as well as the technical contributors to the EIA, will be included within the Environmental Statement.

2. EIA Purpose and Process

EIA is a process carried out which examines available environmental information to ensure that the likely significant environmental effects of certain projects are identified and assessed before a decision is taken on whether a project is granted planning permission. This means environmental issues can be identified at an early stage and projects can then be designed to avoid or to minimise significant environmental effects, and appropriate mitigation and monitoring can be put in place.

Regulation 4 of the EIA Regulations sets out the EIA process. Specifically, Regulation 4(2) states that *“the EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on the following factors:*

- (a) population and human health;*
- (b) biodiversity;*
- (c) land, soil, water, air and climate;*
- (d) Material assets, cultural heritage and the landscape;*



(e) The interaction between the factors referred to in sub-paragraphs (a) to (d)."

The potential for likely significant effects on the below topic areas, during both the enabling and construction works associated with the Proposed Development and once the Proposed Development is complete and operational, have been considered:

- Air Quality;
- Archaeology;
- Climate Change and Greenhouse Gas Emissions;
- Daylight, Sunlight and Overshadowing;
- Ecology and Biodiversity (including Arboriculture);
- Ground Conditions and Land Contamination);
- Health;
- Heritage, Townscape and Visual;
- Noise and Vibration;
- Project Vulnerability (major accidents and natural disasters);
- Socio-Economics;
- Traffic and Transport;
- TV and Radio Interference;
- Waste and Materials;
- Water Resources, Drainage and Flood Risk; and
- Wind Microclimate.

The Scoping Process

EIA Scoping forms one of the first stages of the EIA process. Requesting an EIA Scoping Opinion from a local planning authority, under Regulation 15 of the EIA Regulations, involves the preparation of an EIA Scoping Opinion Request Report (or EIA Scoping Report) and its submission to the local planning authority is part of a formal request for their opinion on the content or 'scope' and approach to the EIA.

The purpose of scoping is to identify:

- The important environmental issues and topics for consideration in the EIA;
- The baseline conditions and assessment methodology to be used for assessment;
- Any potentially sensitive receptors that may be affected by the development being proposed;
- The appropriate space boundaries of the EIA: the site boundary and surrounding environmental context;
- The information necessary for decision-making; and
- The topics of which could result in potential significant effects from the development both during its enabling and construction and operation.

In accordance with the requirements of the Town and Country Planning (Development Management Procedure) Order 2015 (article 18, Schedule 4), this Scoping Report will need to be issued by the local planning authority to the statutory consultees that are considered to have an interest in the EIA of the Proposed Development and should be consulted as part of the EIA Scoping process. It is expected that the local planning authority will also issue the Scoping Report to non-statutory and key, local stakeholders and interest groups who are deemed to similarly have an interest in the EIA of the Proposed Development.

The process of consultation is a key requirement of the EIA process and the views of statutory consultees and other stakeholders help to identify specific issues, as well as identifying additional information in their possession, or of which they have knowledge, which may be of assistance in progressing the EIA.



The ES will append the Scoping Report (this document) and Scoping Opinion and include a summary of any other consultation undertaken as part of the EIA process.

3. EIA Methodology and Approach to Assessment of the Proposed Development

In addition to the EIA Regulations, there is also guidance available that has been referenced where appropriate, including but not limited to:

- at a European level, reference has been made to the European Commission's (EC) various EIA guidance documents available here: <http://ec.europa.eu/environment/eia/eia-support.htm>
- at a domestic level, reference has been made to the Ministry of Housing, Communities and Local Government (MHCLG) overarching PPG¹;
- in addition, the Department for Transport 'Design Manual for Roads and Bridges Volume 11: Environmental Assessment' has been referred to as applicable;
- in relation to publications from professional bodies, reference has been made to IEMA publications as these include best practice/suggested improvements to the EIA process. This includes:
 - IEMA ES Review Criteria (COM3-6)²;
 - IEMA 'Guidelines for Environmental Impact Assessment' (2004)³;
 - IEMA 'Special Report into the State Environmental Impact Assessment Practice in the UK' (2011)⁴;
 - IEMA 'Shaping Quality Development' (2015)⁵;
 - IEMA 'Delivering Quality Development' (2016)⁶;
 - IEMA 'Delivering Proportionate EIA' (2017)⁷;
 - IEMA 'Guide to Materials & Waste in EIA' (2020)⁸;
 - IEMA 'Climate Change Resilience and Adaption' (2020)⁹; and
 - IEMA 'Assessing Greenhouse Gas Emissions and Evaluating their Significance' (2017)¹⁰; and
 - IEMA 'Environmental Assessment of Road Traffic' (1993)¹¹.
- whilst primarily written for major infrastructure projects, reference is also made to guidance/advice notes published by the National Infrastructure Planning where appropriate, as these can include relevant/helpful information;
- applicable case law.

The method behind the EIA process generally¹² takes into account the existing conditions of the area into which the development is being introduced (the baseline) and makes reasonable predictions of the likely change (the impact – in terms of magnitude) that may occur, during both its construction and when the development is completed and operating as proposed. The predicated impact is considered in terms of key environmental and social aspects (receptor / resource) found within the surrounding area, and based on their sensitivity to change, the resulting change experienced by the receptor / resource (the effect) is then determined. Any mitigation measures required in order to reduce or eliminate adverse effects are then considered and assessed, with the residual effect being determined as significant or not. The likely significant effects are then reported (within an

¹ MHCLG. *Planning Practice Guidance*: <https://www.gov.uk/government/collections/planning-practice-guidance>

² Institute of Environmental Management and Assessment, undated; *EIA Quality Mark – ES Review Criteria COM 3-6*.

³ Institute of Environmental Management and Assessment, 2004, *Guidelines for Environmental Impact Assessment*.

⁴ Institute of Environmental Management and Assessment, 2011. *The State of Environmental Impact Assessment Practice in the UK*.

⁵ Institute of Environmental Management and Assessment, November 2015. *Shaping Quality Development*.

⁶ Institute of Environmental Management and Assessment, 2016; *Delivering Quality Development*.

⁷ Institute of Environmental Management and Assessment, 2017; *Delivering Proportionate EIA*

⁸ Institute of Environmental Management and Assessment, 2020; *Guide to Materials and Waste in Environmental Impact Assessment*

⁹ Institute of Environmental Management and Assessment, 2020; *Climate Change Resilience and Adaption*

¹⁰ Institute of Environmental Management and Assessment, 2017, *Assessing Greenhouse Gas Emissions and Evaluating their Significance*

¹¹ Institute of Environmental Management and Assessment, 1993 *'Environmental Assessment of Road Traffic'*

¹² There may be exceptions to the general approach described. Where there are exceptions, this will be clearly described within the relevant methodology section, outlining both the departure from the general EIA methodology and the description of the alternative approach. This is discussed further within 'EIA Process and Methodology' section of this Scoping Report.



environmental statement) for consideration by the relevant planning authority when considering whether to grant planning permission for a development.

Baseline Conditions

Baseline assessments will utilise any existing and available information, as well as new information either collected through baseline surveys undertaken during the EIA process or additional information provided as part of the EIA Scoping Opinion and consultation process. This information will be used to present within the ES (within the individual technical chapters) an up-to-date description of the current baseline conditions of the site and surrounding area.

In accordance with industry best practice, some assessments (such as Daylight, Sunlight and Overshadowing) when assessing the effects of the operation of the Proposed Development will include a projected environmental condition in the future (i.e. 'future baseline'), at the projected year of opening of the Proposed Development. Where using a future baseline is more appropriate, this will be detailed in the relevant methodology of the technical assessment and be made clear in the ES.

In addition, as per the requirements of the EIA Regulations, consideration as to how the current baseline conditions may evolve in the future in the absence of the Proposed Development will also be presented in the ES (within the individual technical chapters). This likely evolution of the baseline conditions will be considered qualitatively, supplemented by quantitative information where relevant and will be used to support the assessment of cumulative development effects.

Covid-19

As a result of the Covid-19 situation, where government restrictions have / will affect the collection of baseline information and / or the results of the baseline survey would not reflect a normal / typical situation, alternate sources of information will be used within the ES or specific assumptions will be made. Where technical assessments rely upon such data, the data used will be clearly identified and stated within the relevant technical chapter of the ES, with any assumptions clearly defined. The technical sections of this Report note where this is relevant with regards to the assessment on the Proposed Development.

Sensitive Receptors

When undertaking an EIA, it is important to identify potential environmental receptors which may be impacted by the Proposed Development and may need to be considered as part of the assessment.

The environmental receptors that may be sensitive to change are identified and discussed within the scope of each technical topic in this EIA Scoping Report (hereafter referred to as 'sensitive receptors'). The sensitive receptors outlined within this EIA Scoping Report have been identified at the time of writing as part of the EIA scoping process, however these will be reviewed during preparation of the ES and may be subject to change.

Enabling and Construction Impact Assessment

The ES (within a non-technical chapter titled 'Introduction, EIA Methodology, Alternatives and Design Evolution, The Proposed Development and Enabling Works and Construction') will provide an outline of the anticipated enabling and construction phasing and programme and related activities and aspects (i.e. enabling works, substructure works, superstructure works etc., waste volumes and construction material quantities, HGV movements and HGV routing). In addition, key environmental controls and management measures relevant to the Proposed Development (including relevant codes of construction practice) will be presented.

This information will inform the enabling and construction impact assessment. Throughout the enabling and construction impact assessments, the assumption will be made that the standard environmental controls required under legislation and best practice guidance are met as a matter of course.

The assessment of the potential for likely significant effects arising during the enabling and construction works will be addressed within each of the individual technical assessment chapters of the ES and will assess against the defined Baseline Condition. The enabling and construction assessments presented within the technical chapters of the ES will identify the need for any additional or bespoke environmental management or mitigation measures in order to avoid, prevent, reduce or off-set any significant adverse effects identified.



Where required, a description of any proposed monitoring arrangements will also be presented and would define (where appropriate) the procedures regarding the monitoring of the relevant significant adverse effects, the types of parameters to be monitored and the monitoring duration.

All the measures proposed within the technical chapters will be compiled and presented in a mitigation and monitoring schedule (to be presented as a separate chapter within the ES).

It is anticipated that any required enabling and construction related environmental management / mitigation and monitoring measures would be secured and controlled through an appropriate Construction Environmental Management Plan ('CEMP') (or equivalent) and it is proposed that the requirement for this document be secured by means of suitably worded planning conditions to be attached to the permission (if granted). Key mitigation and management controls that would later form part of a CEMP will be presented in the ES to help define the policies, procedures and management framework for the implementation of any identified specific environmental management and mitigation controls and monitoring.

Completed Development Impact Assessments

The detailed planning application will include the following information which the Daylight, Sunlight and Overshadowing assessment of the ES will be based on:

- Detailed drawings,
- Floor plans;
- Elevation plans;
- The Proposed Development 'use class' area schedule; and
- A Landscape Strategy

The ES will present a description of the Proposed Development, in terms of the detailed design sought for approval. Sufficient information will be presented to enable the assessment of potential impacts and likely significant effects of the completed and occupied development. Any assumptions made will be clearly presented in the narrative.

Further detail on the relevant planning policy guidance followed through this EIA Scoping Report as well as within the ES can be found within Annex: Planning Policy Context.

Effect Interactions Assessment

Effect interactions occur as interactions between effects associated with just one project, i.e. the combination of individual effects arising as a result of the Proposed Development, for example effects in relation to noise, airborne dust or traffic on a single receptor.

Effect Interactions from the Proposed Development itself on particular receptors at the site and within the surrounds will be considered during the enabling and construction works and also once the Proposed Development is completed and operational. Dependent on the relevant sensitive receptors, the assessment will focus either on key individual receptors or on groups considered to be most sensitive to potential effect interactions. The potential interaction of residual effects that are of minor, moderate or major scale, will be considered within this assessment. Residual effects which are negligible, will be excluded from this assessment as by virtue of their definition, they are considered to be imperceptible.

There is no established methodology for assessing the impact of cumulative effects on a particular receptor. The interaction of a combination of individual effects would be determined to be either 'not significant' or 'significant', a scale of the combined effects (minor, moderate or major) would not be applied. If one of the individual effects is significant the combination of effects would be regarded as 'significant'. If none of the individual effects are significant the interaction of effects would be regarded as 'not significant'.

Consideration of effect interactions will be presented within the ES in a separate chapter (i.e. Effect Interactions (Volume 1)).

Alternatives and Design Evolution



In addition, the EIA Regulations require (Schedule 4) that the ES provides “a *description of the reasonable alternatives [...] relevant to the proposed project and its specific characteristics*” which have been considered by the Applicant and “an indication of the main reasons for selecting the chosen option, including comparison of environmental effects”.

The ES will summarise the evolution of the Proposed Development, any relevant alternatives considered, and key modifications made during the design process. Environmental considerations which have influenced this process will be discussed, and a qualitative comparison will be undertaken of the different design options and their relevant environmental effects, as relevant. Matters that will be considered in terms of design evolution include land uses, layout, building heights and massing. The preferred design, culminating with the Proposed Development being sought for approval, will be discussed.

The ES (within a non-technical chapter titled ‘Introduction, EIA Methodology, Alternatives and Design Evolution, The Proposed Development and Enabling Works and Construction’) will consider the main alternatives (as relevant) and the design evolution. The focus will be on main alternatives considered (as relevant), the evolution of the design, and how environmental considerations influenced the evolution of the scheme. The summary of the design evolution will also consider initial environmental analysis undertaken on the evolving scheme.

4. Determining Effect Significance – Terminology and Approach

Reference to ‘Impact’ and ‘Effect’

It is noted that the terms ‘impact’ and ‘effect’ are distinctly different. Having gained an understanding of the likely impact it is then important to know whether the change in environmental conditions results in a significant environmental effect. The impacts of the Proposed Development may or may not result in significant effects on the environment, depending on the sensitivity of the receptor and potentially other factors (such as duration). The description of the likely significant effects of the development is a requirement identified by Schedule 4 of the EIA Regulations.

Receptor Sensitivity and Magnitude of Impact

To achieve a consistent approach across the different technical disciplines addressed within the ES, assessments will broadly define the sensitivity of the receptors that could be affected by the Proposed Development and the magnitude of impact or change from the baseline. Terminology to describe the sensitivity of receptors and magnitude of impact or change from the baseline conditions is broadly as follows:

- High;
- Medium;
- Low;
- Negligible; and
- No Impact (in relation to magnitude of impact or change only).

Where there is no impact/change, no assessment will be required due to there being no potential for effects.

Each of the technical assessment chapters of the ES will provide further detail on the definition of each of the above terms specific to the topic in question and will also provide the criteria, including sources and justifications, for quantifying the different levels of receptor sensitivity and ‘impact magnitude’. Where possible, this will be based upon quantitative and accepted criteria (for example, national standards for air quality and noise), together with the use of value judgement and expert interpretation.

Identification of a Resultant Effect

The basis for determining the resultant effect generally takes into account the sensitivity of the receptor and magnitude of impact or change from the baseline conditions. A generic matrix that combines the sensitivity of the receptor and the magnitude of impact to identify the resultant effect is provided within **Table 1**. The following matrix will be adapted for each relevant topic in line with specific methodology requirements.



Table 1 Resultant Effects

Receptor Sensitivity	Magnitude of Impact			
	High	Medium	Low	Negligible
High	Major	Major	Moderate	Minor
Medium	Major	Moderate	Minor	Negligible
Low	Moderate	Minor	Negligible	Negligible
Negligible	Minor	Negligible	Negligible	Negligible

Effect Scale

The categories and definitions of the 'scale' of the resultant effect i.e. definitions of Major, Moderate, Minor and Negligible effects will be adjusted to suit the technical topic in question; where this is the case revised definitions of effect scale will be presented in the technical assessment chapters of the ES. Where there is no impact to a receptor and therefore no effect, this will be stated.

Effect Nature

Table 2 provides general definitions of the 'nature' of the resultant effect i.e. definitions of Adverse, Neutral and Beneficial. Typically, the 'nature' of an effect is defined where the 'scale of the effect' is classified as minor, moderate or major (i.e. the 'nature' is not typically defined for effects classified as negligible in scale).

Table 2 Definition of the Nature of the Resultant Effect

Type of Effect	Description
Adverse	Detrimental or negative effects to an environmental / socio-economic resource or receptor. The quality of the environment is diminished or harmed.
Neutral	The quality of the environment is preserved or sustained or there is an equal balance of adverse and beneficial effects.
Beneficial	Advantageous or positive effect to an environmental / socio-economic resource or receptor. The quality of the environment is enhanced.

Geographic Extent of Effect

The ES will identify the geographic extent of the identified effects. At a spatial level, 'site' or 'local' effects are those affecting the site and neighbouring receptors, while effects upon receptors in the EHDC area beyond the vicinity of the site and its neighbours are considered to be at a 'district / borough' level. Effects affecting Hertfordshire County are considered to be at a 'regional' level, whilst those which affect different parts of the country, or England as a whole, are considered being at a 'national' level.

Effect Duration

For the purposes of the ES, effects that are generated as a result of the enabling and construction works (i.e. those that last for this set period of time) will be classed as 'temporary'; these may be further classified as either 'short term' or 'medium-term' effects depending on the duration of the enabling and construction works that generate the effect in question. Effects that result from the completed and operational Proposed Development will be classed as 'permanent' or 'long-term' effects.

Direct and Indirect Effects

The ES will identify whether the effect is 'direct' (i.e. resulting without any intervening factors) or 'indirect' or 'secondary' (i.e. not directly caused or resulting from something else).

Effect Significance

Following identification of an effect, the effect scale, nature, geographic extent and duration using the above summarised terminology, a clear statement will then be made within the ES as to whether the effect is significant or not significant. As a general rule, the following applies:

- 'Moderate' or 'major' effects are deemed to be 'significant'.



- 'Minor' effects are 'not significant', although they may be a matter of local concern; and
- 'Negligible' effects are 'not significant' and not a matter of local concern.

Where mitigation measures are identified to either eliminate or reduce likely significant adverse effects, these will be incorporated into the ES, for example either through the design, or will be translated into enabling and construction commitments; or operational or managerial standards / procedures.

The ES will then highlight the 'residual' likely significant effects (those effects which remain following the implementation of suitable mitigation measures) and will classify these in accordance with the terminology defined above.

Annex B: Planning Policy Context

Annex B: Planning Policy Context

ANNEX B

PLANNING POLICY CONTEXT

The ES, within **ES Volume 1, Chapter 1: Introduction, EIA Methodology, Alternatives and Design Evolution, The Proposed Development and Enabling Works and Construction**, will define the relevant national, regional and local policy context. Specifically, the ES will list out the key relevant policy documents but will not discuss the policies within these in any detail.

Although relevant policies out of the key planning policy documents will, in some instances, inform the scope and the methodology of the technical assessments within the EIA, the Proposed Development's compliance with and performance against the relevant planning policies will be appraised within the Planning Statement which will be a standalone document that is submitted in support of the planning application. It is not the purpose of the ES to appraise the Proposed Development against relevant national, regional and local planning policy standards / targets.

Where planning policy informs the scope and the methodology of the technical assessments of the EIA, the policies will be presented in the ES (in the relevant technical topic chapters) and discussed as necessary. Any policy detail required to support the relevant impact assessment scope, methodology or assessment of effects, will either be provided within the technical topic chapter itself or within an appendix to the ES.

1. National Planning Policy and Guidance

The EIA will be undertaken having regard to the National Planning Policy Framework ('NPPF')¹. The NPPF sets out the Government's economic, environmental and social planning policies for England. The policies contained within the NPPF articulate the Government's vision of sustainable development, which are intended to be interpreted at a local level, to meet the requirements of local aspirations.

As relevant to the EIA, specifically to the scope, methodology and assessment of effects for the EIA technical topics, the NPPF shall be considered throughout undertaking of the EIA and preparation of the ES.

The EIA will also refer to, as relevant to the EIA technical topics, the Planning Practice Guidance ('PPG'), which is an online resource. The PPG aims to make planning guidance more accessible, and to ensure that the guidance is kept up to date.

2. Strategic Planning Policy and Guidance

As relevant to the EIA technical topic scope, methodology or assessment of effects, the ES will have regard to the following key strategic planning documents. Any additional strategic planning policy and guidance documents considered relevant to the technical assessments which are covered by the EIA will also be considered:

- The London Plan² - The Spatial Development Strategy for Greater London. The London Plan is the Spatial Development Plan for London and part of the statutory Development Plan for Greater London; and

¹ Ministry of Housing, Communities and Local Government, 2019, *National Planning Policy Framework*

² *The London Plan, The Spatial Development Strategy for Greater London, March 2021.*

https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf



- Supplementary Planning Guidance³ ('SPG') (i.e. further guidance on policies in the London Plan that can't be addressed in sufficient detail in the plan itself).

3. Local Planning Policy and Guidance

As relevant to the EIA technical topic scope, methodology or assessment of effects, the ES will have regard to key local planning policy and guidance documents.

Brent Local Plan (2022)

As relevant to the EIA technical topic scope, methodology or assessment of effects, the ES will have regard to key local planning policy and guidance documents.

The Brent Local Plan 2019-2041⁴ was adopted by the LBB on 24th February 2022. This replaced the Brent Core Strategy 2010, Brent Site Allocations Plan 2011, Wembley Area Action Plan 2015 and Development Management Policies Plan 2016.

The Brent Local Plan sets out the overarching objectives for the Borough, spatial policies and strategic framework for development. The site forms part of the larger BSWSA8 – Wembley High Road Site Allocation (see Figure 6) as described in the Brent Local Plan 2019 – 2041. The site and its surrounds are allocated for mixed-use residential led development incorporating main town centre uses and an increase in industrial floorspace.

4. Other Guidance

In addition to any relevant planning policies that inform the scope, methodology or assessment of effects, as relevant, the technical topic chapters of the ES will present a summary of any pertinent recognised industry guidance documents.

³ London Assembly, List of Adopted SPGs: <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/planning-guidance>

⁴ London Borough of Brent (LBB), (2022); Brent Local Plan

Annex C: 'Scoped In' Topic Sheets

Annex C: 'Scoped In' Topic Sheets

TOPIC SHEET

DAYLIGHT, SUNLIGHT, OVERSHADOWING, SOLAR GLARE AND LIGHT POLLUTION

Introduction

- 1 It is considered that there is the potential for likely significant effects relating to Daylight, Sunlight and Overshadowing and so this topic shall be scoped into the EIA.
- 2 The Daylight, Sunlight and Overshadowing ES Chapter shall:
 - Define the Daylight, Sunlight and Overshadowing baseline conditions;
 - Identify relevant Daylight, Sunlight and Overshadowing receptors; and
 - Assess:
 - i. the potential for Daylight, Sunlight and Overshadowing impacts throughout the enabling and construction works and as a result of the completed development and resultant Daylight, Sunlight and Overshadowing effects;
 - ii. the likely significant Daylight, Sunlight and Overshadowing effects;
 - iii. any required mitigation or monitoring to address any likely significant adverse Daylight, Sunlight and Overshadowing effects; and
 - iv. the potential for cumulative Daylight, Sunlight and Overshadowing effects.

Methodology

- 3 The assessment of daylight, sunlight, overshadowing and solar glare will be based upon the guidance and recommendations set out in the Building Research Establishment's (BRE) Site Layout Planning for Daylight and Sunlight; A Guide to Good Practice (2022)¹, relevant national and development plan policies and other related guidance, as well as application of professional judgment.
- 4 The initial baseline to be considered as part of the daylight, sunlight and overshadowing assessments will be the existing site conditions at the time of the submission of the application. Due to the advanced construction stage of the Wembley Links development, it will be considered as part of the existing baseline.
- 5 Daylight and sunlight amenity at any surrounding developments which have been granted planning consent and are in close proximity to the Proposed Development are considered to be future residential receptors are therefore also assessed.
- 6 Therefore, the Proposed Development will be assessed against both the existing baseline (the baseline conditions at the site and immediate surrounding area at the time of the assessment) and against the future baseline to account for completed cumulative schemes that will introduce sensitive receptors with a reasonable expectation of daylight and sunlight.

Study Area

- 7 Existing sensitive receptors, buildings under construction and cumulative schemes with planning permission with windows facing the Proposed Development, and within close proximity of the site boundary will be assessed. These will be determined using professional judgement based on scale, proximity and planning status.

¹ Building Research Establishment 'Site Layout Planning for Daylight and Sunlight - A Guide to Good Practice 3rd Edition, 2022 (BRE Guidelines).



Key policy and legislation relevant to your assessment

- 8 The following policy and guidance is considered to be relevant to the assessment of Daylight and Sunlight;
- National Planning Policy Framework (NPPF-July 2021);
 - National Planning Policy Guidance (NPPG – June 2021);
 - The London Plan (March 2021);
 - The London Plan Housing SPG (March 2016, Updated 2017);
 - Brent Design Guide SPD1 (November 2018); and
 - Brent Local Plan 2019-2041 (Adopted February 2022).

Baseline Conditions

Current Baseline Condition

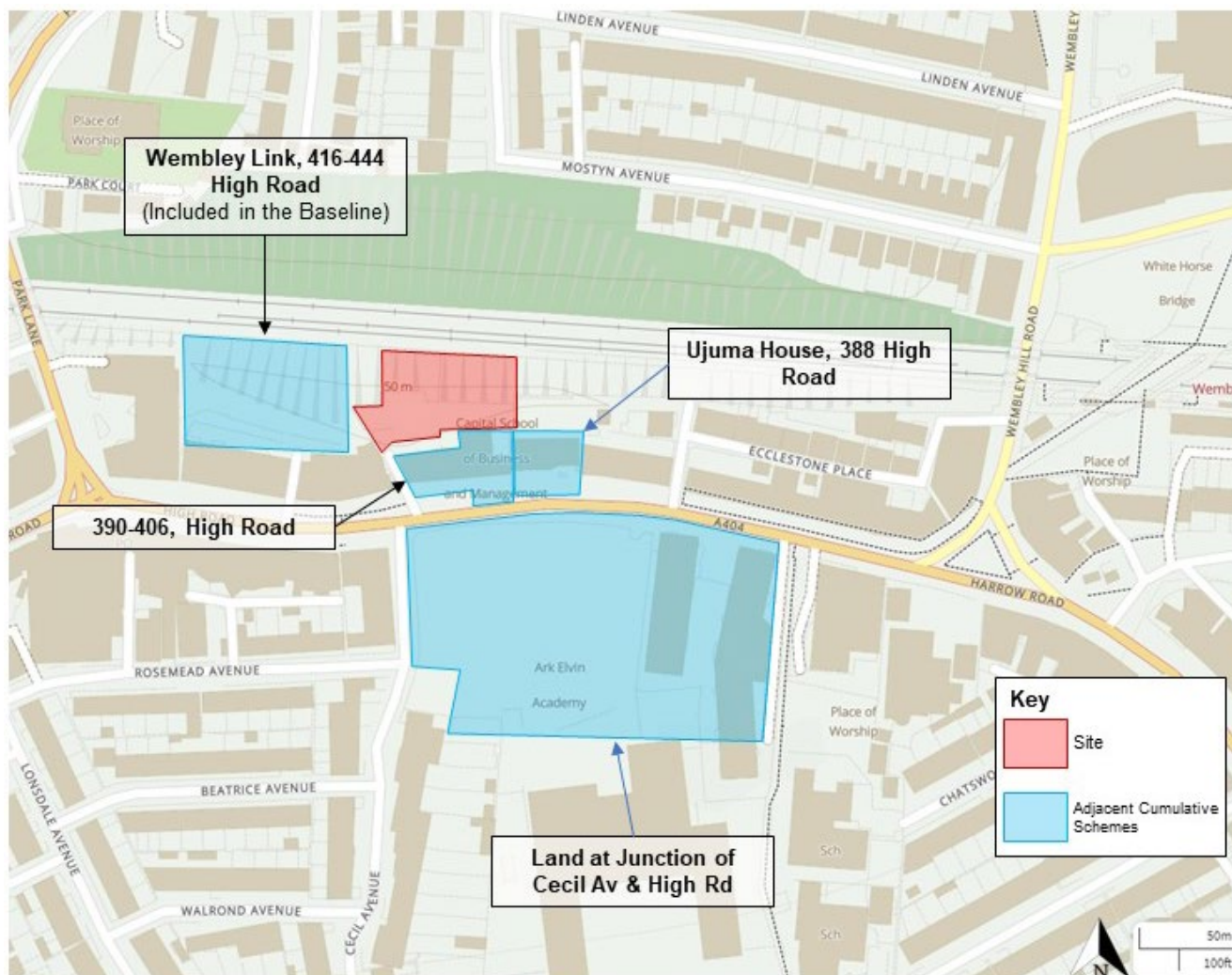
- 9 BRE Guidelines suggests that only neighbouring residential buildings, or other sensitive uses, require consideration for daylight and sunlight. BNPPRE have therefore undertaken a review of the potentially relevant neighbouring buildings to ascertain which have potentially sensitive uses, and which have the potential to be affected in terms of daylight and sunlight. BRE Guidelines recommend that external amenity spaces are sensitive to additional overshadowing, these must also therefore be considered.
- 10 Existing buildings that contain sensitive uses and form part of the baseline condition are listed below:
- Wembley Link (Residential) (Planning Ref. 18/3111 – Phase 1 Complete, Phase 2 nearing completion and therefore the scheme has been included within the baseline);
 - 412-422 (evens) Wembley High Street (Mixed Use – Residential above Commercial);
 - 367-373 (odds) Wembley High Street (Mixed Use – Residential above Commercial); and
 - Best Western (Apart-Hotel).
- 11 In terms of overshadowing, the amenity space associated with Wembley Link located to the west of the site, will be considered in the standalone Daylight and Sunlight Report.

Future Baseline Condition

- 12 The Proposed Development will be assessed against both the existing baseline (the baseline conditions at the site and immediate surrounding area at the time of the assessment) and against the future baseline to account for completed cumulative schemes that will introduce sensitive receptors with a reasonable expectation of daylight and sunlight.
- 13 There are a number of consented residential developments surrounding the site. As these schemes are consented but not under construction, they would form part of a Future Baseline in against which the impacts of the Proposed Development would be considered. These emerging residential developments would be considered in combination with the existing buildings described above. These cumulative schemes include:
- 390-406, High Road, Wembley, HA9 (Student) – Planning Ref. 22/2225
 - Ujima House, 388 High Road, Wembley, (Residential) - Planning Ref. 19/3092; and
 - Land at Juncture of Cecil Ave & High Road (Residential) – Planning Ref. 19/2891.



Figure 1 Adjacent Cumulative Schemes



Enabling Works and Construction

- 14 The level of effect on daylight and sunlight availability to existing and emerging neighbouring receptors would vary throughout the enabling works and construction stage and would steadily increase in magnitude as the Proposed Development is built. Any temporary accommodation or construction equipment such as cranes would only have a temporary effect on the daylight and sunlight levels to the surrounding sensitive receptors.
- 15 Similarly, the overshadowing effect to surrounding public and private open areas of amenity would experience varying effects throughout the demolition and construction stage, gradually increasing as the proposed development is built out, with potential temporary overshadowing effects as a result of construction equipment.
- 16 Those effects that would be perceptible during the enabling and construction stage would be no worse than those of the completed development. A qualitative assessment of enabling and construction activities will be undertaken using professional judgement, with the worst-case scenario represented by the completed development.

Completed Development

- 17 The likely significant effects of the completed development will be discussed within the ES chapter. Daylight, sunlight and overshadowing analysis is being undertaken throughout the design stages and as such mitigation measures are incorporated into the design of the Proposed Development.
- 18 The BRE Guidelines state that residential properties have a reasonable expectation of daylight and sunlight. Therefore, the daylight and sunlight assessment will consider impacts to surrounding existing and emerging residential properties identified by a site inspection and a desktop study. In addition, survey information will be used to identify residential properties most likely to experience effects from the Proposed Development.
- 19 Information on the receptors will be gathered using details available on the Brent Council planning database, estate agent's property particulars and site inspections. Where analysis is to be undertaken of buildings under



construction or emerging developments, information available on Brent Council planning portal will be used to determine the position of windows. If information is available to determine the layout of the rooms, the interior layouts will also be applied to the analysis model and additional daylight and sunlight testing will be undertaken. Where information on existing receptors are not available, reasonable room layout assumptions will be made and presented in the assessment.

- 20** The studies to be undertaken will use a three-dimensional computer model of the site and the surrounding buildings in the study area for the following scenarios:
- Scenario 1: Baseline (representing the current site conditions);
 - Scenario 2: Baseline vs Proposed Development (representing the completed development);
 - Scenario 3: Baseline vs Proposed Development + cumulative development (Cumulative); and
 - Scenario 4: Baseline + cumulative development vs Proposed Development (Future Baseline).
- 21** Additionally, a fifth scenario will be assessed: Baseline + external cumulative development vs Proposed Development + 390-406, High Road, Wembley, HA9 (Student) – Planning Ref. 22/2225. This will be considered as a standalone scenario presented within the ES.
- 22** The effect of the proposed development on the daylight and sunlight amenity received by the neighbouring buildings will be analysed using MBS software.
- 23** The buildings considered in the baseline will be assessed for daylight using Vertical Sky Component (VSC) and No Sky Line (NSL).
- 24** The sunlight amenity will be considered by reference to the Annual Probable Sunlight Hours (APSH) method for the existing and future baseline and Proposed Development scenarios 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 rooms which face the site and are located within 90 degrees of due south.
- 25** In analysing the resultant daylight and sunlight assessment data, consideration will be given to the criteria set out in the BRE Guidelines. However, since the BRE Guidelines do not specifically relate to metropolitan locations, and as stated in the BRE Guidelines, a degree of flexibility will be applied to the site, as it is located in an urban area. In order to quantify the level of effect as a result of the proposed development, a degree of significance will be assigned to the results for each receptor.
- 26** The initial numerical criteria for determining the scale of effect is based on percentage alterations, as follows:
- 0 – 19.9 % alteration = Negligible;
 - 20 - 29.9 % alteration = Minor;
 - 30 - 39.9 % alteration = Moderate; and
 - Greater than 40 % alteration = Major.
- 27** The significance of effects, will be determined using professional judgement and by reference to Appendix H of the BRE Guidelines, which state;
- “the assessment of impact will depend on a number of factors, and there is no simple rule of thumb that can be applied”*
- 28** The guidelines provided by the BRE for determining the significance of effects on daylight and sunlight amenity are as follows:
- “H6 Where the loss of skylight or sunlight does not meet the guidelines in this book, the impact is assessed as minor, moderate or major adverse. Factors tending towards a minor adverse impact include;*
- *only a small number of windows or limited area of open space are affected*
 - *the loss of light is only marginally outside the guidelines*
 - *an affected room has other sources of skylight or sunlight*
 - *the affected building or open space only has a low level requirement for skylight or sunlight*
 - *there are particular reasons why an alternative, less stringent, guideline should be applied...”:*
- “H7 Factors tending towards a major adverse impact include:*
- *a large number of windows or large area of open space are affected*
 - *the loss of light is substantially outside the guidelines*
 - *all the windows in a particular property are affected*



- *the affected indoor or outdoor spaces have a particularly strong requirement for skylight or sunlight, e.g. a living room in a dwelling or a children's playground."*

"H8 Beneficial impacts occur when there is a significant increase in the amount of skylight or sunlight reaching an existing building where it is required, or in the amount of sunlight reaching an open space. Beneficial impacts should be worked out using the same principles as adverse impacts."

- 29 According to the BRE Guidelines, surrounding residential buildings have an expectation of natural light in habitable rooms. Therefore, surrounding buildings are considered receptors of high sensitivity to daylight and sunlight levels of equal weighting, and each individual receptor is not assigned a level of sensitivity as per the usual EIA methodology i.e. high, medium or low.
- 30 The overall degree to which each receptor is affected is also considered alongside the magnitude of change to each assessed room/window to assess the overall significance of effect.
- 31 Based on the above guidance, a set of numerical parameters will be devised for each of the respective BRE Report's recommended assessments methods, in order to determine the significance of effects if and where the target values in the BRE Guidelines are not achieved. This numerically based significance criteria will be detailed in full in the ES.
- 32 With regard to the potential significance of any effect, the results will first be considered against the BRE Guidelines criteria "P. Littlefair (2022) Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (BR 209)". It is primarily on this basis that the significance of the effect will be determined. Where the BRE Guidelines criteria are not met, and before an overall significance is concluded for a particular dwelling, house or room, the retained levels of daylight and sunlight will be also considered against alternative target values set for this site. This approach has been accepted by other local authorities in London, where the need for new homes and consequently densification is acknowledged. Evidence for the alternative target values will be produced for discussion at Pre-Application meetings and to accompany the application, in line with that discussed with other local authorities for projects of similar size, nature and urban location.

Cumulative Effects Assessment

- 33 Due to the proximity to 390-406 Wembley High Road (Planning Ref: 22/2225) immediately to the south which is also anticipated to be brought forward by the Applicant, the potential for significant cumulative effects from the Proposed Development and this scheme will be considered as part of the cumulative effects assessment. All remaining cumulative schemes will be considered in combination with the Proposed Development and 90-406 Wembley High Road (Planning Ref: 22/2225). Therefore, the daylight, sunlight and overshadowing cumulative assessment will consider the following assessment scenarios:
- The Proposed Development with 390-406 Wembley High Road (Planning Ref: 22/2225); and
 - The Proposed Development with 390-406 Wembley High Road (Planning Ref: 22/2225) and all other cumulative schemes.

Non-Significant Effects

Solar Glare

- 34 A Solar Glare technical assessment chapter is proposed to be scoped out of the ES because the Proposed Development would not give rise to significant environmental effects in relation to glare.
- 35 The Proposed Development does not intend to comprise large areas of glazed or reflective material, as such, the risk of solar glare towards nearby roads or rail viewpoints is considered low. The Chiltern railway line runs to the north of the site. However, due to its east-west direction of travel and location to the north, the southern elevation of the Proposed Development where solar reflections could occur if the external façade of the building was glazed or contained reflective material would not be visible to train drivers. In addition, the west elevation is likely to be shielded by Wembley Links- and the south elevation will be shielded by the 390-406, High Road, consented development (Planning Ref: 22/2225). This, combined with the nature of the Proposed Development which does not include large areas of glazing, means that Solar Glare is not considered a key issue. Therefore, no further consideration is required for Solar Glare.

Light Pollution

- 36 A Light Pollution technical assessment chapter is proposed to be scoped out of the ES because the Proposed Development would not give rise to significant environmental effects in relation to light spill.



37 As the Proposed Development is residential containing purpose built student accommodation, it is not anticipated to emit levels of artificial light beyond the ILP recommendation². Therefore, no further consideration is required for Light Pollution. A lighting strategy will be included within the Design and Access Statement (DAS) which will be submitted in support of the planning application.

² *Institute of Lighting Professionals (ILP) ILP Guidance Note 1 for the reduction of obtrusive light (2021) GN01-21*

TOPIC SHEET

NOISE AND VIBRATION

Introduction

- 1 It is considered that there is the potential for likely significant effects relating to Noise and Vibration and so this topic shall be scoped into the EIA in regard to the construction of the Proposed Development.
- 2 The Noise and Vibration ES Chapter shall:
 - Define Noise and Vibration baseline conditions;
 - Identify relevant Noise and Vibration receptors;
 - Assess:
 - a. the potential for noise and vibration impacts throughout the enabling and construction works and resultant noise and vibration effects;
 - b. the likely significant noise and vibration effects;
 - c. any required mitigation or monitoring to address any likely significant adverse noise and vibration effects; and
 - d. the potential for cumulative noise and vibration effects.

Baseline Conditions

Current Baseline Conditions

- 3 The site location in relation to its surroundings is shown in on Figure 1 outlined in red. Baseline noise monitoring has been undertaken in February and March 2023.
- 4 The existing environmental noise climate at the site is dominated by road traffic noise from the surrounding road network and railway traffic. The Chiltern Railways line, at surface level, that borders the site to the north, runs east to west between Wembley Stadium station and Sudbury & Harrow Road station. The railway line is the key environmental vibration source considered for the Proposed Development.

Noise Baseline

- 5 An environmental noise survey has been carried out to determine the existing sound levels in the area. The noise survey was carried out between 11:44 on Friday 24 February 2023 and 15:15 on Wednesday 1 March 2023. Data from the survey has been used to determine the baseline conditions.
- 6 The representative background sound levels measured during the survey were $L_{A90,15min}$ 48 dB during the daytime and $L_{A90,15min}$ 43 dB at night at position 'L' (overlooking the railway line to the north).
- 7 Attended measurements were undertaken at positions labelled '1' to '4' in Figure 1.
- 8 Measured ambient noise levels were in the range of $L_{Aeq,5min}$ 46-69 dB during the day. The average ambient noise levels measured during the unattended survey were $L_{Aeq,16h}$ 59 dB during the daytime and $L_{Aeq,8h}$ 53 dB at night.
- 9 Data from the noise survey will be used to inform the design of the Proposed Development with respect to noise egress from building services plant and environmental noise ingress through the building envelope.



Vibration Baseline

- 10 An environmental ground-borne vibration survey has been carried out to determine the existing vibration levels at the site and surrounding area and to determine the key issues and potential effects. The vibration survey was carried out on 24 and 28 February 2023 at positions 'V', 'W' and 'X' on Figure 1. Data from the survey has been used to determine the baseline conditions.
- 11 Additional environmental ground-borne vibration measurements have been carried out at the Wembley Link site (rear of 416-444 High Road) to determine the in-situ building coupling loss, i.e., the loss in vibration caused by the building foundations and sub-structure, in these specific ground conditions. The vibration measurements were carried out on 13 April 2023.
- 12 Based on review of published train timetables and the vibration measurement results, the equivalent vibration dose value (VDV) at position 'V' in Figure 1, over a 16 hour daytime period and 8 hour night period have been predicted, as summarised below.
 - Equivalent VDV daytime (16 hour): 0.16 m/s^{1.75}
 - Equivalent VDV night-time (8 hour): 0.08 m/s^{1.75}.
- 13 The predicted equivalent VDV over daytime and night-time periods are both below the respective criteria of 0.2 m/s^{1.75} and 0.1 m/s^{1.75}.
- 14 Assessment of re-radiated ground-borne noise has been carried out based on; the building comprises a heavyweight construction (i.e., concrete) supported on piles; the assessed in-situ building coupling losses; there will not be significant changes to the nearby railway lines in terms of arrangement, track, rolling stock or operation.
- 15 The predicted re-radiated ground-borne noise levels for ground floor and first floor levels are summarised below. Re-radiated noise levels would be lower than this at higher levels within the building.
 - Lower ground floor, upper ground floor and first floor ground-borne predicted re-radiated noise levels, L_{ASmax} 35-40 dB.
 - Second floor and above ground-borne predicted re-radiated noise levels, $L_{ASmax} \geq 35$ dB.
- 16 Predicted ground-borne re-radiated noise levels due to passing trains are below the criterion of L_{ASmax} 40 dB. The aforementioned criteria has been determined by London Underground Limited through a study on the relationship between ground-borne noise levels and complaint thresholds¹. This was used to define a complaint threshold of L_{Amax} 40 dB, which has been used to inform an appropriate criterion.
- 17 Both tactile vibration and ground-borne re-radiated noise are below their respective assessment criteria and therefore vibration from passing trains are not considered to be an issue for the Proposed Development.

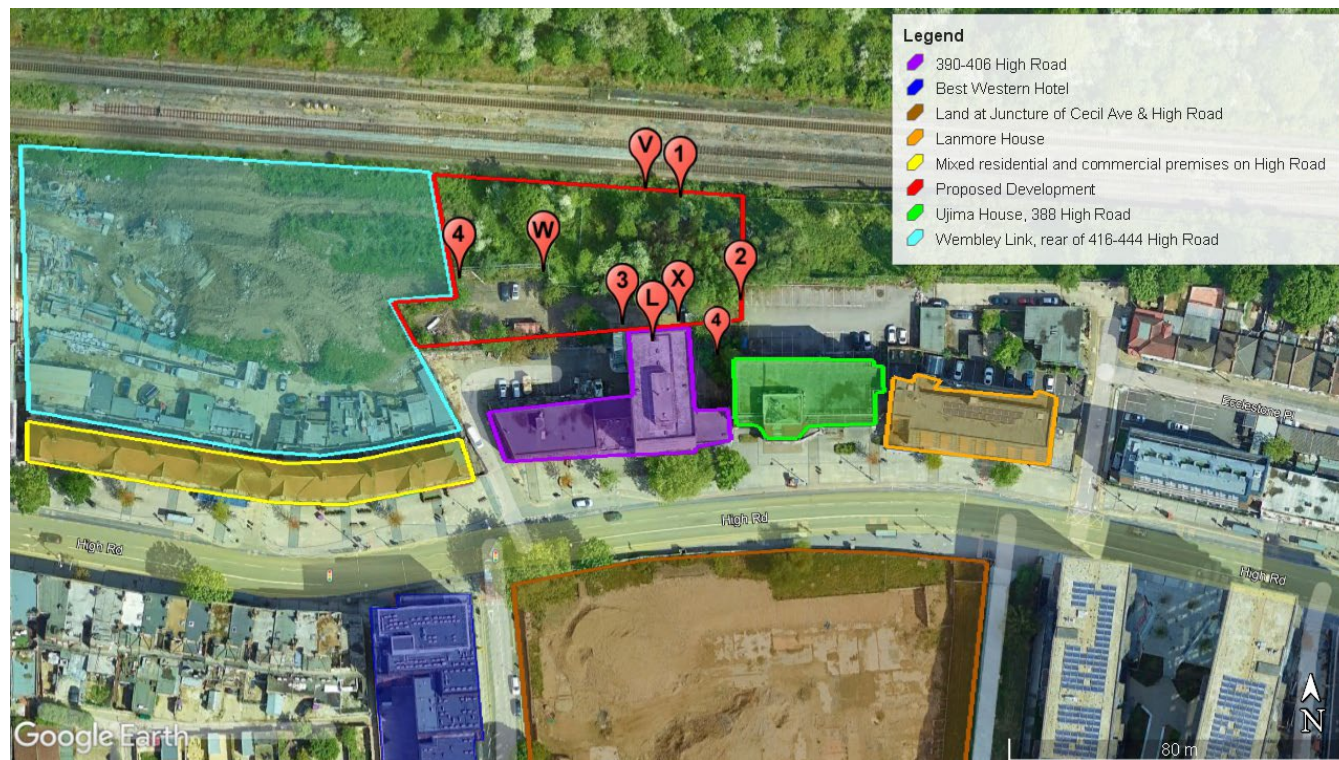
Receptors

- 18 The site is located adjacent to the following premises:
 - 390-406 Wembley High Road (Planning Ref. 22/2225) (highlighted in purple in Figure 1);
 - Mixed residential and commercial premises on High Road (highlighted in yellow in Figure 1);
 - Ujima House, 388 High Road – Commercial (Planning Ref. 19/3092) (highlighted in green in Figure 1);
 - Best Western Hotel (highlighted in blue in Figure 1);
 - Lanmore House – Residential and commercial (highlighted in orange in Figure 1) ;
 - Wembley Link, rear of 416-444 High Road (Planning Ref. 18/3111) (highlighted in cyan in Figure 1); and
 - Proposed residential premises – Land at Juncture of Cecil Ave & High Road (Planning Ref. 19/2891) (highlighted in brown in Figure 1).
- 19 These sensitive receptors have the potential to be affected by noise and vibration from the Proposed Development due to their proximity to the site.
- 20 The Proposed Development will also introduce student accommodation and amenity areas, that will be considered as sensitive receptors within a site suitability assessment.

¹ LUL guidance, Noise and Vibration Asset Design Guidance G1323 (Transport for London, 2012)



Figure 1 Aerial View of the Site



Source: Google Earth Pro (2023)

Assessment of Effects

21 The scope of the noise assessment will include:

- Identifying the potentially sensitive noise receptors on and surrounding the site; and
- Identifying whether the overall effect of the noise exposure generated by the Proposed Development is, or would be, above or below the significant observed adverse effect level (SOAEL) and the lowest observed adverse effect level (LOAEL).

22 The scale of effects will refer to guidance within the IEMA *Guidelines for Environmental Noise Impact Assessment*, 2014 and listed below.

Policy and Legislation

23 The key policy and legislation that will be considered is listed below:

- Control of Pollution Act 1974
- National Planning Policy Framework, 2021
- National Planning Practice Guidance, 2019
- Noise Policy Statement for England, 2010
- The London Plan – Spatial Development Strategy for Greater London, 2021
- The Mayor’s Ambient Noise Strategy, 2004
- Sustainable Design and Construction – Supplementary Planning Guidance
- The London Borough of Brent Local Plan 2019-2041
- BS 4142:2014+A1:2019 *Methods for rating and assessing industrial and commercial sound*
- BS 5228-1:2009+A1:2014 *Code of practice for noise and vibration on construction and open sites. Part 1: Noise* and BS 5228-1:2009 *Code of practice for noise and vibration control on construction and open sites. Part 2: Vibration*
- BS 6472-1:2008 *Guide to evaluation of human exposure to vibration in buildings. Part 1: Vibration sources other than blasting*



- BS 8233:2014 *Guidance on sound insulation and noise reduction for buildings*
- ProPG: for planning and noise, 2017
- Association of Noise Consultants *Acoustics Ventilation and Overheating, Residential Design Guide*.

Potential Effects Proposed to be Scoped Out

- 24 The assessment will not consider the following types of noise and vibration (ie, they will be scoped out):
- Construction road traffic – noise from construction vehicles (proposed development and cumulative);
 - Completed Proposed Development road traffic noise;
 - Completed Proposed Development road vibration;
 - Completed Proposed Development building services noise; and
 - Completed Proposed Development operational noise.
- 25 It is considered that construction road traffic and road traffic noise associated with the completed development can be scoped out, as it would require greater than a 25% increase in vehicle movements to cause a 1 dB increase in resultant noise levels, equating to 'low impact' in line with IEMA *Guidelines for Environmental Noise Impact Assessment*, 2014.
- 26 It is considered that road traffic vibration associated with the completed development can be scoped out, as it would require greater than a 25% increase in vehicle movements to cause a 5% increase in resultant vibration does values (VDV), which is not considered significant.
- 27 It is considered that building services noise associated with the completed development can be scoped out as building services plant noise egress is to be designed so that it does not exceed 10 dB below the existing background sound level which would cause ≤ 1 dB increase, equating to 'negligible impact' in line with IEMA *Guidelines for Environmental Noise Impact Assessment*, 2014.
- 28 It is considered that operational noise associated with the completed development can be scoped out as operational noise egress is to be designed so that it does not exceed 10 dB below the existing background sound level which would cause ≤ 1 dB increase, equating to 'negligible impact' in line with IEMA *Guidelines for Environmental Noise Impact Assessment*, 2014.

Demolition Works and Construction

- 29 Potential effects associated within enabling and construction activities are likely to include temporary noise and vibration nuisance due to the enabling and construction works period including earthworks, substructure works and superstructure works – associated with daytime and (if required) night time works.

Site Suitability

- 30 A stand-alone Noise and Vibration Impact Assessment will be submitted in support of the planning application. This will set out the site suitability assessment, including; internal and external noise level criteria for residential uses, and internal vibration criteria to be achieved upon completion an assessment of site suitability from an environmental noise and vibration perspective, and a description of the expected mitigation measures required to achieve these criteria.

Methodology

Demolition and Construction

- 31 Estimation of noise generated (impact magnitude) during each phase of the enabling and construction works and an assessment of the likely effects on surrounding sensitive receptors pre-mitigation will be undertaken. The assessment will be based on the "ABC" methodology set out in British Standard BS 5228:2009², as interpreted within Table 1.

² British Standards (BS) 5228-1:2009+A1:2014 *Code of practice for noise and vibration control on construction and open sites - February 2014*



Table 1 Description of the magnitude of impact rating for assessing the likely and residual effects of demolition and construction noise and vibration

Magnitude of Impact	Daytime noise levels (07:00-19:00)	Vibration Levels
Very low	Lower than ambient ¹ L_{Aeq} or less than L_{Aeq} 65 dB.	Peak particle velocity (PPV) less than 0.3 mm/s
Low	Higher than ambient L_{Aeq} less than L_{Aeq} 65 dB.	PPV regularly exceeding 0.3 mm/s, but less than 1.0 mm/s.
Medium	Higher than ambient and between L_{Aeq} 66-70 dB	PPV regularly exceeding 1.0 mm/s, but less than 10.0 mm/s.
High	Higher than ambient and greater than L_{Aeq} 70 dB	PPV regularly exceeding 10.0 mm/s.

¹ –Ambient noise levels less than $L_{Aeq,12hr}$ 59 dB

32 Estimation of noise and vibration generated during enabling and construction works in each phase of the works and an assessment of the likely significant effects on surrounding sensitive receptors. The mitigation measures identified would need to be secured by the implementation of a CEMP. However, these measures will be summarised as part of the ES chapter.

Cumulative Assessment

33 Cumulative construction noise and vibration effects associated with construction works at the site being undertaken simultaneously with construction works on other surrounding development sites close to the site (within 400m) or with shared/common receptors shall be defined.

34 Due to the proximity to 390-406 Wembley High Road (Planning Ref: 22/2225) immediately to the south which is also anticipated to be brought forward by the Applicant, the potential for significant cumulative effects from construction noise and vibration will be considered with the Proposed Development. All remaining cumulative schemes will be considered in combination with the Proposed Development and 390-406 Wembley High Road (Planning Ref: 22/2225). Therefore, the noise and vibration cumulative assessment will consider the following assessment scenarios:

- The Proposed Development with 390-406 Wembley High Road (Planning Ref: 22/2225);
- The Proposed Development with 390-406 Wembley High Road (Planning Ref: 22/2225) and all other cumulative schemes:
 - a) Land at Juncture of Cecil Ave & High Road, HA9 (Planning ref: 19/2891);
 - b) Wembley Link, Land, garages, alleyway rear of 416-444, High Road, Wembley, HA9 (Planning ref: 18/3111); and
 - c) Ujima House, 388 High Road, Wembley, HA9 6AR (Planning ref: 19/3092).

Annex D: 'Scoped Out' Topic Sheets

Annex D: 'Scoped Out' Topic Sheets

TOPIC SHEET

AIR QUALITY

Introduction

- 1 It is considered that significant effects relating to Air Quality are unlikely and as such this topic is 'scoped out' of the EIA. The following section provides a summary of the baseline Air Quality conditions and clarifying why no likely significant effects are expected.
- 2 The consideration of potential impacts on air quality has been undertaken by Air Quality Consultants Ltd, who are also preparing an Air Quality Assessment to be submitted to support the planning application for the Proposed Development.

Baseline Conditions

- 3 The site is located within the LBB and lies within an Air Quality Management Area (AQMA) declared by LBB for exceedances of the annual mean nitrogen dioxide (NO₂) and 24- hour mean particulate matter (PM₁₀) objectives. The site is also located within the 'Wembley High Road from Ealing Road to Park Lane' air quality Focus Area, one of 187 areas identified by the Greater London Authority (GLA) as locations that not only exceed the annual limit value for NO₂, but also have high levels of human exposure. Additionally, the site is located directly to the south of railway lines serving Chiltern Railways however these railway lines are not identified in Defra's Local Air Quality Management (LAQM) TG22¹ as being of concern with regards to pollutant emissions (namely NO₂).
- 4 A review of the LBB's 2021 Annual Status Report (ASR)² indicates that annual mean concentrations of NO₂ at monitoring sites within 1km of the Proposed Development exceeded the objective in 2019. Exceedances were also monitored in 2020 and 2021 despite the impact of the Covid-19 pandemic on measured pollutant concentrations, which generally reduced activity and traffic volumes.
- 5 The closest sensitive receptors which may be affected by the Proposed Development are the proposed adjacent residential properties at 390-406 High Road and the existing residential properties west of the site at 412-420 High Road.

Discussion for Scoping Out

Enabling Works and Construction

- 6 Machinery and plant used during construction can generate emissions including dust, particulate matter and NO₂, in addition to construction traffic movements to and from the site. The construction works themselves can also generate dust and particulate matter.
- 7 The Institute of Air Quality Management (IAQM) guidance³, on which the GLA's Supplementary Planning Guidance (SPG) on 'The Control Dust and Emissions from Construction and Demolition' is based⁴, provides a method for assessing the risk from construction dust on nearby sensitive receptors. This risk-based assessment allows the potential level of risk from the construction activities associated with the Proposed Development to be identified, which then allows for the appropriate level of mitigation required to be determined.

¹ Defra (2022) Local Air Quality Management Technical Guidance (TG22)

² London Borough of Brent (2022) Air Quality Annual Status Report for 2021.

³ IAQM (2016) Guidance on the Assessment of Dust from Demolition and Construction v1.1, Available: <http://iaqm.co.uk/guidance/>.

⁴ GLA (2014) The Control of Dust and Emissions from Construction and Demolition SPG, Available: <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/control-dust-and->



- 8 The guidance from the IAQM states that human receptors within 350 m of the site and designated ecological sites within 50m of the site or trackout routes have the potential to be impacted by the construction works. While there are multiple human receptors within 350 m of the site, there are no designated ecological sites within 50m of the site boundary, or those roads along which material may be tracked, such as Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Sites of Specific Scientific Interest (SSSI); however, the Chiltern Lines Site of Importance for Nature Conservation (SINC) is partially located within the site to the north. This ecological site is a low sensitivity receptor; however, the impact of construction works upon this site and nearby human health receptors will be assessed and mitigated accordingly.
- 9 Appropriately determined mitigation will be secured through a standard CEMP, which will include a Dust Management Plan (DMP). A CEMP would be secured by a suitably worded planning condition, to be agreed with the LBB. This will include standard measures to control emissions and may include monitoring of dust deposition and/or visual inspections. With appropriate mitigation in place, the guidance is clear that the residual effect should normally be 'not-significant'.
- 10 In addition to emissions from the works themselves, construction traffic will lead to temporary changes in traffic flows on the existing local road network, which may impact upon air quality at existing sensitive receptors. As the Proposed Development is located within an AQMA, the 'Land-Use Planning and Development Control: Planning for Air Quality v1.2' guidance⁵ published by Environmental Protection UK (EPUK) and the IAQM recommends that, where the annual average number of Heavy-Duty Vehicle (HDV) movements is greater than 25 vehicles per day (as an Annual Average Daily Traffic (AADT) flow), a more detailed assessment of the impacts of construction traffic is required. However, given the scale of the Proposed Development, it is unlikely that there will be an average of more than 25 HDV movements per day. Additionally, a Construction Logistics Plan (CLP) will be implemented, to ensure that vehicles movements are appropriately managed. Taking these aspects into account, it is judged that the impact of construction traffic emissions upon local air quality will be 'not significant'.

Completed Development

- 11 The Proposed Development will be a 'car-free' scheme and the majority of associated vehicular movements will be attributable to servicing and deliveries, with a small number of movements associated with the proposed student accommodation. On this basis, it is anticipated that development-generated road traffic can be screened out of the assessment as their volumes will be below screening criteria for within an AQMA, published by EPUK/IAQM. This will, however, be confirmed once the Transport Assessment for the Proposed Development has been undertaken. Any changes to these numbers will be summarised and included within the Air Quality Assessment which will support the planning application.
- 12 The Proposed Development will include roof-mounted Air-Source Heat Pumps (ASHP) systems for the provision of heat and hot water, supplemented by a back-up emergency diesel generator. ASHP systems do not have any emissions associated with them, and thus can be screened out of the assessment. The emissions from the emergency diesel generator could, however, impact on local air quality conditions at existing (and introduced) receptors, and as such consideration will need to be given to their emissions, taking into account of the engine specification and testing regime.
- 13 As the site is located within an AQMA, consideration also needs to be given to the potential effects on the new sensitive receptors (i.e., student residential receptors) introduced within the Proposed Development. The design of the Proposed Development will, however, ensure that the new residents and users are not exposed to unacceptable air quality, so that any significant effects are minimised.
- 14 The GLA's London Plan⁶ requires new developments to be at least 'air quality neutral'. The air quality neutral policy is intended to minimise the cumulative impacts of many developments throughout London. The air quality neutrality of the Proposed Development will, therefore, be addressed following the methodology provided in the GLA's Air Quality Neutral (AQN) guidance document⁷. Appropriate mitigation will be recommended, if required, to ensure that the Proposed Development meets the air quality neutral requirement of the AQN guidance.
- 15 Additionally, Part C of Policy SI 1 on 'Improving Air Quality' within the London Plan introduces the concept of Air Quality Positive for large-scale development subject to Environmental Impact Assessment (EIA). As the site is located within the Wembley Growth Area, the LBB's Local Plan 2019-2041⁸ states that the site should be air

⁵ Moorcroft and Barrowcliffe et al (2017) *Land-Use Planning & Development Control: Planning For Air Quality v1.2*, IAQM, London, Available: <http://iaqm.co.uk/guidance/>.

⁶ GLA (2021) *The London Plan: The Spatial Development Strategy for London*, Available: https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

⁷ GLA (2023) *London Plan Guidance – Air Quality Neutral*

⁸ LBB (2022) *Brent Local Plan 2019-2041*



quality positive. As such, an Air Quality Positive Statement will be prepared in accordance with GLA's Air Quality Positive document⁹ and submitted in support of the planning application.

Potential Cumulative Effects

Enabling Works and Construction

- 16 As above, the IAQM guidance (upon which the GLA's guidance is based) is clear that, with appropriate mitigation measures in place, any residual demolition and construction dust effects from an individual site will be not significant. It is anticipated that all cumulative construction sites (such as 390-406 Wembley High Road) will adopt appropriate mitigation measures to limit emissions of dust (which will be included in a CEMP), will hold the liaison meetings and will ensure that plans are co-ordinated to minimise impacts upon the most sensitive receptors. With these measures in place, the cumulative effect of construction activities will not be significant.
- 17 With regards to the cumulative effect of construction vehicle emissions, a CLP will be implemented to minimise the environmental and road traffic related impacts of construction. During constructions the appointed contractor will collaborate with surrounding developers (in particular cumulative schemes along High Road) where there is likely to be cumulative effects in construction traffic to avoid any overlap in peak construction vehicle activities in order to reduce the potential cumulative effects of construction emissions. The cumulative effects of construction traffic will not be significant.

Completed Development

- 18 The Proposed Development is car-free and as such there is unlikely to be cumulative effects to air quality from traffic emissions.
- 19 As above, the details of any diesel back-up generator flue, alongside the testing and maintenance regime, will be carefully considered so as to ensure that there will be no significant impacts upon local air quality at sensitive uses within the nearest cumulative schemes. Should any of the adjacent cumulative schemes also include a back-up generator or centralised energy plant, the emissions from these units will be considered within the design and operation of the Proposed Development, such that there will be no cumulative effects.

Mitigation Measures and Design Recommendations

- 20 In terms of measures to minimise emissions associated with the Proposed Development, the Proposed Development will utilise all-electric ASHP systems for the provision of heat and hot water to the building. As previously discussed, the Proposed Development will include an emergency diesel generator for the provision of essential power to the building in emergencies. The location, height and setting of the generator flue, alongside the testing and maintenance regime, will be carefully considered so as to ensure that there will be no significant impacts upon local air quality.
- 21 Student amenity space, Back of House and utility space will be located at ground-floor level with more sensitive student accommodation uses located at first floor and above, increasing the distance between sensitive receptors and sources of pollution (i.e., road traffic emissions). Additionally, as previously discussed, the Proposed Development is a 'car-free' development.

Conclusion

- 22 Based on the information currently available, the Proposed Development is not considered likely to result in significant effects in relation to air quality. An Air Quality Assessment, Air Quality Neutral Assessment and Air Quality Positive statement will be submitted to support the planning application.
- 23 Therefore, the issue of Air Quality is **scoped out of the EIA**.

⁹ GLA (2023) London Plan Guidance – Air Quality Positive

TOPIC SHEET

ARCHAEOLOGY

Introduction

- 1 It is considered that significant effects relating to Archaeology are unlikely and as such this topic is ‘scoped out’ of the EIA. The following section provides a summary of the baseline Archaeology conditions and clarifying why no likely significant effects are expected.
- 2 In accordance with relevant government, national and local policy and guidance on archaeology, and in accordance with the ‘Standard and Guidance for Historic Environment Desk-Based Assessments’ (Chartered Institute for Archaeologists, 2021) an Archaeological Desk Based Assessment (DBA) has been undertaken by Oxford Archaeology and is appended to this EIA Scoping Report drawing together the available archaeological, topographic and land-use information in order to clarify the archaeological potential of the site.
- 3 A 500m study area was considered to adequately characterise the likely archaeological conditions within the site. Greater London Historic Environment Record (GLHER) data was obtained in March 2023 and that data has been examined for the preparation of the archaeological DBA.

Baseline Conditions

- 4 The British Geological Survey (BGS 2023) records the underlying bedrock geology as clay, silt, and sand of the London Clay Formation. No overlying superficial deposits are recorded (BGS 2023). The soils within the site are recorded as slowly permeable, seasonally wet, and slightly acid but base-rich loamy and clayey soils.
- 5 No designated heritage assets are recorded within the site, and only one listed building is located within the study area. The Roman Catholic Church of St Joseph is situated c 250m south-east of the site and is a Grade II listed post-war church in a loosely neo-Georgian style with Romanesque influences, built in 1955–7. The modern church replaced a small late 19th-century building that was originally used as a cemetery chapel, serving the small cemetery located at the end of Waverley Avenue.
- 6 No previous archaeological investigations have been carried out within the site. The Greater London HER records 15 investigations within the surrounding study area comprising six desk-based assessments six watching briefs carried out in the north-east of the study near Wembley Stadium (and three evaluations. No significant archaeological remains were encountered during the six watching briefs all of which revealed made-ground deposits related to 20th-century development overlying the natural London Clay. Archaeological evaluation at 34 Wembley Hill Road, approximately 380m east-north-east of the site, revealed a sequence of alluvial deposits but no archaeological features or finds.
- 7 The site and surrounding study area are situated on London Clay. Limited archaeological evidence of prehistoric activity has been identified on the claylands of north London and the wider London Clay zone, which contrasts with the abundance of sites recorded on the gravels of the River Thames and its tributaries.
- 8 No heritage assets of specific prehistoric date have been recorded within the site of study area by the GLHER. However, a single sherd of late Bronze Age pottery was recovered from a shallow modern pit excavated during an evaluation) at the Ark Elvin Academy (formerly Copland Community School), approximately 220m south-south-east of the site. This pottery was found within a modern feature and provides only limited evidence for a possible low-level or transitory presence in the wider landscape during the late Bronze Age.
- 9 During the Roman period, Wembley was situated to the northwest of the Roman settlement of *Londinium* and west of the Roman road Watling Street. No heritage assets indicative of Roman activity have been recorded within the site or the 500m study area, which is consistent with the more general absence of evidence for Roman



settlement on the clay-topped high ground of north London, possibly reflecting the well-wooded nature of the landscape in the period.

- 10 Wembley is likely to have developed from a small Saxon settlement, a sub-manor of the ancient parish of Harrow. The first documentary reference of Wembley or 'Wemba Lea'—meaning 'Wemba's clearing'—is from a charter dated AD 825. There is no specific mention of Wembley in the Domesday Book (1086), though it records the settlement at Harrow, located in the Hundred of Gore in the county of Middlesex.
- 11 During the medieval period, the parish of Harrow (also known as Harrow on the Hill) comprised 12 centres of settlement, of which Wembley was one. The medieval settlement of Wembley lay on the north side of a large triangular green on the top of Wembley Hill, approximately 260m to the north of the site, and is known to have had well-wooded surroundings. High Road, Wembley, which runs directly south of the site and continues to the west and southeast as Harrow Road, is likely to have medieval, if not late Saxon, origins.
- 12 At the end of the medieval period, the site and surrounding landscape was part of a large open field system that was served by scattered farmsteads. The agricultural nature of the landscape during the medieval period is reiterated by the results of archaeological investigations carried out within the study area, in particular a 2008 evaluation at the Ark Elvin Academy approximately 225m southeast of the site in which medieval remains comprising a shallow gully and shallow parallel ditch, both containing 12th to 14th-century pottery, were recorded and considered to have been related to land drainage.
- 13 The rural settlement character of the study area continued from the medieval period into the early post-medieval period. The site was probably in use as woodland/agricultural land associated with the settlement on Wembley Hill situated to the north of the site from at least the medieval period and throughout the post-medieval period, with cartographic evidence indicating that the site formed part of Wembley Hill Farm in the mid 19th century. Medieval/post-medieval ploughing of the site is likely to have truncated any sub-surface features and deposits that may have been present.
- 14 Development on the land around the site expanded during the late 19th and early 20th centuries, particularly with the construction of the new route of the Great Central Railway and its associated embankment on which the site is located. Further adjustments to the embankment and therefore the site, were carried out throughout the second half of the 20th century. The size of the embankment constructed by 1914 and largely maintained throughout the 20th century suggests that large volumes of soil have already been excavated from the northern portion of the site, suggesting that any preserved archaeological deposits within those layers have been removed. Later adjustments to the extent of the escarpment in the late 20th century involved the construction of made ground for levelling (There is also evidence of manholes in the southern portion of site indicative of service trenching and associated ground disturbance with the instalment of amenities to local buildings).

Discussion for Scoping Out

- 15 As outlined above the site has a generally low potential to contain prehistoric, Roman or medieval deposits. Any deposits within the site are likely to have been damaged or removed by the 20th century development of the site.
- 16 The potential impacts resulting from the scheme would be dependent upon the nature of the groundworks and the exact construction methodology. It is anticipated that the Proposed Development could result in groundworks associated with some or all of the following activities:
 - Landscaping and grading of the site to create level ground;
 - Excavation of foundation trenches and installation of piling caps for the foundations of the new buildings;
 - Excavation of trenches for new services, soakaways and other attenuation features;
 - Ground modification for infrastructure; and
 - Any other intrusive groundworks.
- 17 Given the likely low potential of the area and the disturbance from the 20th-century development of the site, it is unlikely that there will be significant surviving below-ground archaeological remains across much of the site and the Proposed Development is therefore considered unlikely to have any significant archaeological impact.

Potential Cumulative Effects

- 18 Dependent upon the nature and location of the cumulative schemes all of these have the potential to contain archaeological deposits (although potential and survival are likely to vary according to individual site conditions). It is likely that each of these developments will have been the subject to archaeological review which will have determined their individual archaeological requirements, designed to as appropriate remove or reduce any archaeological effects. The Proposed Development has been categorised as having a very low or negligible



potential to affect significant deposits and therefore its effect upon the archaeological resource of the area is unlikely to contribute to any potential cumulative archaeological effect of the Proposed Development that the other cumulative schemes may potentially have. Therefore, there are not expected to be any cumulative effects which would be considered significant.

Mitigation Measures and Design Recommendations

- 19** The effect of the Proposed Development on potential archaeological remains will be a material consideration in the determination of a submitted planning application. The DBA (**Annex E**) produced for this site has not identified any archaeological remains of sufficient importance to prevent or significantly constrain the development of the site, which has been developed since the mid-1950s. Redevelopment of the site has potential to have an adverse impact upon any surviving archaeological remains that may be present. However, this assessment has demonstrated that the site has low potential to contain archaeological deposits predating the medieval period and has suggested that any later deposits are likely to have been at least partially disturbed/truncated by 20th-century development. On the basis of the low potential of the site and the likelihood that any deposits that may have been present are likely to have been significantly affected by the post-war development of the site it is suggested that there is no requirement for further archaeological surveys or mitigation measures associated with the Proposed Development of the site.

Conclusion

- 20** The Proposed Development is not considered likely to result in significant effects in relation to archaeology.
- 21** Therefore, the issue of Archaeology is **scoped out of the EIA**.

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TOPIC SHEET

CLIMATE CHANGE AND GREENHOUSE GASES

Introduction

- 1 The consideration of climate within an EIA is stipulated within the EIA Regulations¹ which subsequently outlines a requirement for a description of *'the impact of the project on climate'* and *'the vulnerability of the project to climate change'* (Schedule 4, paragraph 5(f)).
- 2 It is not proposed that climate change and greenhouse gases are to be assessed as a separate technical chapter of the ES. However, climate change and greenhouse gases will be inherently considered where relevant throughout the ES and the planning application.
- 3 As such, climate change and greenhouse gases are scoped out as a technical chapter of the ES but will be considered within this topic sheet as outlined in the below sections.

The Proposed Development's Potential Impact on Climate Change

- 4 The approach to assessing the potential impact of the Proposed Development on the climate has been considered in accordance with the Institute of Environmental Management and Assessment (IEMA) guidance *'Assessing Greenhouse Gas Emissions and Evaluating their Significance'*². This guidance sets out a 'good practice' approach to achieving a proportionate assessment of a development's potential impact on climate change and communicating the results in terms of a notional percentage contribution relative to a carbon budget, together with appropriate mitigation.
- 5 The guidance presents a series of principles developed by IEMA, which highlight that all Greenhouse Gas (GHG) emissions contribute to climate change, and that the combined effect of all emissions draws us closer to the scientifically defined environmental limit for climate change. The IEMA guidance assigns significance criteria to the impact of a development's lifecycle GHG emissions, relative to its alignment with the UK Government decarbonisation targets to achieve Net Zero Carbon by 2050, and limit global temperature increase to 1.5°C above pre-industrial levels. In order for a development to comply with the 1.5°C trajectory of decarbonisation, mitigation is encouraged early and throughout the design process, in line with IEMAs acknowledgement that the ability to effect change to achieve GHG emissions reduction for a project reduces over time.
- 6 Based on the scale of the Proposed Development and the student accommodation uses proposed, in the context of relevant greenhouse gas (GHG) emission benchmarks and budgets, it is considered unlikely that the contribution of GHG emissions associated with the Proposed Development (including embodied carbon within materials and operational carbon emissions) would lead to material changes in climate conditions over the life of the Proposed Development.
- 7 However, a Whole Life Carbon Assessment will be completed and submitted in support of the planning application. This will analyse the carbon emissions from each stage of the Proposed Development to understand the potential impact on climate change of the Proposed Development.
- 8 Furthermore, a Circular Economy Statement will be submitted in support of the planning application that will detail the measures incorporated into the design and operation of the Proposed Development to reduce waste and emissions.
- 9 An Energy Statement and Sustainability Statement will also be submitted in support of the planning application. The Energy Statement will consider regulated emissions during the operation of the Proposed Development and

¹ Her Majesty's Stationery Office (HMSO) (2017); *The Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2017 (amended in 2018 and 2020)*.

² IEMA, (2022); *'Assessing Greenhouse Gas Emissions and Evaluating their Significance', 2nd Edition*



will ensure that carbon emissions and the impact on climate change is minimised as far as possible through the design by following the London Plan energy hierarchy of 'be lean, be clean, be green', 'be seen'. The Sustainability Statement will also outline sustainable design features which will seek to reduce the impact of the Proposed Development on climate change.

- 10 Details from the abovementioned reports will be provided within the ES to summarise how the impacts of the Proposed Development on climate change will be reduced.
- 11 As such, based on the above and given the proposed incorporation of sustainable design standards and principles, the Proposed Development in isolation is not considered to have significant effects to climate change and the potential impact on climate change is proposed to be scoped out of the EIA.

The Potential Impact of Climate Change on the Proposed Development

- 12 The approach for assessing the potential impact of climate change on the Proposed Development has been considered in accordance with IEMA's guidance '*Climate Change Resilience and Adaptation*' (2020)³ which presents a framework for the consideration of climate change resilience and adaptation in the EIA process.
- 13 It is not proposed that the potential impact of climate change on the Proposed Development is assessed as a separate technical chapter of the ES, with this instead covered through good design management and consideration of the potential impacts of climate change inherently throughout the Proposed Development.
- 14 The key climate change projections within the UK likely to be relevant to urban regeneration projects and specifically to the site are summarised below:
 - Summers will become hotter and drier;
 - Winters will become milder and wetter;
 - Sea levels will rise; and
 - Storms, heavy and extreme rainfall, and extreme winds will become more frequent.
- 15 With regard to climate change resilience relating to sea level rise and extreme rainfall, the Flood Risk Assessment and Drainage Strategy will outline measures to be incorporated into the design to safeguard against flooding risks and effects at the site, accounting for climate change. The site is located within Flood Zone 1, which means there is a low probability of flooding, and the land has been assessed as having a less than 1 in 1,000 (0.01%) annual probability of river or sea flooding. It is also at very low to low risk of flooding from surface water flooding. With the introduction of suitable sustainable drainage measures, it is therefore considered unlikely that there will be increased risk at the site with regards to the potential for sea level risk and extreme rainfall as a result of climate change.
- 16 With regard to climate change resilience relating to hotter and drier summers, the planning application is to be accompanied by a standalone Overheating Assessment to ensure that the ideal comfort temperature inside the Proposed Development will be achieved and will be regulated in line with the outdoor air temperature. If an overheating risk is identified, the cooling hierarchy set out within the London Plan would be followed to reduce this risk, including the use of mechanical ventilation should the need arise (albeit this would be as a last resort). The increased risk of higher temperatures would therefore be covered through the design of the Proposed Development be considered through other elements of the planning application, outside of the EIA.
- 17 With regard to climate change resilience relating to storms and extreme winds, the Proposed Development is up to 22 storeys in height and is a similar size and scale to surrounding buildings. It is therefore, not likely to be susceptible to storms and extreme weather, including unsafe wind speeds, for which there is a greater potential with taller buildings due to how these react with the wind environment. In any case, the Proposed Development will adhere to the latest Building and Health Safety Regulations to ensure site users are protected from external weather conditions and CFD testing will be completed to ensure that areas of potential risk are mitigated through the inclusion of specific design measures. Furthermore, it is not expected that the introduction of the Proposed Development would alter the wind environment within the local area. The chance of more frequent and extreme storms and wind conditions is therefore considered unlikely to result in significant impacts to the Proposed Development.
- 18 The ES will present any climate change adaptation and resilience measures designed into the scheme as part of the description of the Proposed Development (**ES Volume 1, Chapter 1: Introduction, EIA Methodology, Alternatives and Design Evolution, The Proposed Development and Enabling Works and Construction**), and will also report the process of design for the resilience and adaptive measures developed for the scheme as part of the consideration of alternatives (**ES Volume 1, Chapter 1: Introduction, EIA Methodology,**

³ IEMA (2020). *Climate Change Resilience and Adaptation*



Alternatives and Design Evolution, The Proposed Development and Enabling Works and Construction).

The impact of climate change on the Proposed Development will therefore be sufficiently addressed within the ES and wider planning application deliverables, without the need for a standalone ES chapter.

- 19** Therefore, the issue of Climate Change and Greenhouse Gases are **scoped out as a technical chapter of the ES.**

TOPIC SHEET

ECOLOGY AND BIODIVERSITY

Introduction

- 1 It is considered that significant effects relating to Ecology and Biodiversity are unlikely and as such this topic is 'scoped out' of the EIA. The following section provides a summary of the baseline Ecology and Biodiversity conditions and clarifying why no likely significant effects are expected.
- 2 The consideration of the potential effects of the Proposed Development has been undertaken by Ecology by Design Ltd.
- 3 A Preliminary Ecological Appraisal (PEA) has been prepared by Ecology by Design Ltd was produced in April 2023. This report is based on a field survey using standard methodologies¹ and utilising the UK Habitat Classification System² carried out to assess the ecology of the site on 28th February 2023. The aim of the PEA is to map the habitats present onsite and assess their potential to support notable / protected species. The PEA was supported by the following:
 - An initial ecological desk study;
 - A survey of the habitats; and
 - A protected species scoping survey.
- 4 The PEA has been appended to this report and is included in **Annex F**.
- 5 Biodiversity Net Gain calculations will be prepared and submitted with the planning application, which will demonstrate the site's change in biodiversity value before and after the development.

Baseline Conditions

- 6 The desk-based survey results have identified the following:
 - There are no statutory designated sites within the site boundary. The northern half of the site sits within the 'Chiltern Line between River Brent and Sudbury Hill Harrow' SINC with a further 25 SINC's located within 2km of the site;
 - The MAGIC website shows that there are no records of previous European Protected Species Licences (EPS) for bats within 2km of the site. One record for a previous great crested newt EPS was returned, located 1.9km to the north-west of the site and separated from the site by the Chiltern railway line; and
 - The site lies within an Impact Risk Zone (IRZ) for Brent Reservoir Site of Special Scientific Interest (SSSI) however, the development does not apply to any of the categories which require consultation with Natural England.
- 7 The UK habitat classification survey involved inspecting the site for evidence of, and potential to support protected and/or notable species, and for invasive plant species. The survey involved mapping the existing

¹ CIEEM (2017). *Guidelines for preliminary ecological appraisal, 2nd edition*. Chartered institute of Ecology and Environmental management, Winchester

² Butcher, B., Carey, P., Edmonds, R., Norton, L. ad Treweek, J. (2020). *UK Habitat Classification– Habitat Definitions V1.1*. at <http://ukhab.org>



habitats present on site. the potential habitats and species types were recorded on the 28th February 2023 when conditions were cold and windy.

- 8 The habitat types recorded on 28th February included;
 - Mixed scrub;
 - Modified grassland;
 - Bare ground; and
 - Hardstanding.
- 9 A potential badger sett was identified within the mixed scrub at the north of the site and was subject to monitoring with trail cameras to determine if it is in active use. No evidence for the presence of Badgers was recorded during the survey (11th April to 10th May 2023) and the sett is considered to be disused. Therefore there is no potential for likely significant effects.
- 10 There is potential for breeding birds to be present onsite and all birds within the UK are protected by the Wildlife and Countryside Act 1981 (as amended) whilst nesting. No vegetation clearance should be undertaken during the active nesting season (1st March to 31st August inclusive) unless preceded by a check undertaken by a suitably qualified ecologist. This will be managed during construction through the implementation of a CEMP.
- 11 The site was found to be unsuitable / provide low potential for all other protected/notable species.

Mitigation Measures and Design Recommendations

- 12 Following the implementation of reasonable design and mitigation measures the Proposed Development will not result in any adverse significant impacts to species present within the site or surrounding area. The EclA has recommended the following specific mitigation and enhancement for species include:
 - Habitat creation to improve the biodiversity value of the site;
 - Biodiversity offsetting should be used to compensate for the loss of biodiversity on site by investing in a biodiversity offsetting scheme;
 - Maintenance of vegetation corridor at the north of the site to maintain the functionality of the on-site SINC;
 - Implementation of a sensitive lighting scheme to avoid disturbing bats;
 - Vegetation clearance undertaken outside of the nesting bird season (March to August inclusive) or preceded by a check from a suitably experienced ecologist;
 - Implementation of appropriate site management practices; and
 - Bird and bat boxes will be affixed to the new building or retained trees to provide roosting information.
- 13 It is likely that given the implementation of the above measures, the Proposed Development is likely to result in no net loss of biodiversity once completed and operational. Ecological enhancements will be embedded into the design of the Proposed Development.

Conclusion

- 14 The Proposed Development is not considered likely to result in significant effects in relation to biodiversity. An Ecological Impact Assessment including badger survey results will be submitted to inform the planning application.
- 15 Therefore, the issue of Ecology and Biodiversity is **scoped out of the EIA**.

TOPIC SHEET

GROUND CONDITIONS AND CONTAMINATION

Introduction

- 1 It is considered that significant effects relating to Ground Conditions and Contamination are unlikely and as such this topic is 'scoped out' of the EIA. The following section provides a summary of the baseline Ground Conditions and Contamination conditions and clarifying why no likely significant effects are expected.
- 2 The consideration of the potential effects on ground and groundwater conditions as a result of the Proposed Development has been undertaken by Milvum Engineering Services Ltd on behalf of Terrell Ltd.
- 3 A Phase 1 Preliminary Risk Assessment (PRA) has been produced for the Proposed Development and has been used to inform this screening assessment. This report is provided within **Annex G**.

Baseline Conditions

- 4 The site comprised farmland associated with Wembley Hill Farm from at least 1865 until the development of the overland railway to the north by 1914 when the site became part of the railway cutting on the southern part of the railway line. In the 1950s the far southern part of the site was part of the adjacent 'depot' building. This building was subsequently demolished to form the current 'Fairgate House' by the early 1980s and at this time the site formed its current site layout of car parking and an access road to the south and the vegetated slope down to the railway line in the north.
- 5 Based on geological mapping, it is anticipated that the site is underlain by Made Ground over London Clay detailed as an Unproductive Aquifer. Unproductive Aquifers are defined as strata with negligible significance for water supply or baseflow to rivers, lakes and wetlands. The site is not within a groundwater Source Protection Zone (SPZ). The site is designated as being at Low Risk from groundwater flooding.
- 6 There are no surface water features within 250m of the site.

Discussion for Scoping Out

- 7 Previous contaminative activities associated with the adjacent depot and garage may have resulted in soil contamination which could potentially impact upon human health. Significant groundwater contamination originating from the adjacent site is not anticipated given the presence of underlying Unproductive Aquifer comprising low permeability cohesive material and any mobile phase contamination is unlikely to migrate beyond low permeability strata to deeper groundwater.
- 8 Potential pollutant linkages during the construction works are likely to include:
 - Direct contact between construction workers and potentially contaminated shallow soils and groundwater during works to install additional foundations – Low Risk with construction workers to be provide with suitable PPE in line with their risk assessments under CDM (2015) Regulations¹;
 - Spills or leaks from construction materials stored onsite reaching offsite users and ecological receptors – Low Risk with a CEMP to be produced to limit any potential spillages.
 - Mobilisation of potential contamination present at shallower levels to shallow and deep groundwater due to expected intrusive works – Low Risk with a CEMP to be produced to limit any potential spillages; and

¹ The Construction (Design and Management) Regulations 2015



- Inhalation of potentially contaminated dust, or direct contact with run-off from stockpiled soils during the construction works to onsite and offsite users, and ecology - Low Risk with a CEMP to be produced to limit any run-off or airborne dust.
- 9 Potential pollutant linkages when the Proposed Development is completed and operational are likely to include:
- Chemical attack from pyrites (sulphur/sulphate) within soil and groundwater conditions to proposed below-ground structures and buried services – Low Risk the Proposed Development is to be designed to withstand any potential chemical attack; and
 - Foundation piles creating a potential preferential pathway for downward migration of shallow groundwater to deeper aquifers – Low Risk – the proposed piling technique will be cognisant of any migration of contamination and the adopted technique likely to comprise CFA piles.
 - The construction of the proposed hardstanding (building footprints and pavements) onsite will remove any near surface interaction of soil contamination with future site users. However, a generic quantitative risk assessment (GQRA) to be undertaken as part of intrusive ground investigation works and summarised within a report which will accompany the planning application. The GQRA will verify contamination conditions and recommendation will be provided based on the analysis of results. This will assist in deriving the final risk assessment for the site which will identify if there are any specific remediation or mitigation measures to be implemented. A Remediation Strategy and/or Mitigation Strategy is to be secured via planning condition that will address land contamination as identified by intrusive site investigation work. With the implementation of this strategy this will confirm the risk as Low.
- 10 The Proposed Development will be undertaken in accordance with current best practice and therefore will not introduce new sources of contamination which could adversely impact upon ground or groundwater quality. Redevelopment of the site will require compliance with regulatory standards in relation to contamination and therefore it is considered that the Proposed Development will have either no effect or a beneficial effect on ground and groundwater quality.

Mitigation Measures and Design Recommendations

- 11 A ground investigation will be undertaken to confirm the ground and groundwater conditions beneath the site. A GQRA will be undertaken as part of the ground investigation (following on from the Phase 1 PRA. The GQRA will be undertaken from data obtained during the ground investigation works to determine whether there are potential risks to human health from soil, groundwater, or ground gas contamination. Should potential risks be identified, then a Remediation Strategy will be developed and implemented as part of the pre-commencement enabling and construction activities associated with the Proposed Development. If contamination is identified, then it is likely that standard remedial techniques will be sufficient to mitigate the risks. At this stage, it is considered likely that remediation would comprise the use of Personal Protective Equipment (PPE) during construction, the installation of upgraded potable water supply pipes resistant to permeation by hydrocarbons and the installation of ground gas and/or vapour protection measures in the new buildings.

Conclusion

- 12 The Proposed Development is not considered likely to result in significant impacts to ground and groundwater conditions. It is considered likely that the redevelopment of the site once operational would have beneficial effect in relation to ground and groundwater conditions as a result of future ground investigations and remediation (where required).
- 13 The ground investigation and accompanying GQRA will be undertaken and submitted as part of the planning application for the Proposed Development. The GQRA will determine the presence or absence of soil, groundwater, and ground gas contamination, assess any potential risks to human health or environmental receptors and if necessary, design remediation measures to protect the receptors at risk. All remediation activities will be independently verified and following completion, a Verification Report will be produced and submitted to the LBB to support the discharge of any imposed contaminated land planning conditions.
- 14 Therefore, the issue of Ground Conditions and Contamination is **scoped out of the EIA**.

TOPIC SHEET

HERITAGE, TOWNSCAPE AND VISUAL IMPACT ASSESSMENT

Introduction

- 1 It is considered that significant effects relating to Heritage, Townscape and Visual Impact are unlikely and as such this topic is 'scoped out' of the EIA. The following section provides a summary of the baseline Heritage, Townscape and Visual Impact conditions and clarifying why no likely significant effects are expected.
- 2 The consideration of potential impacts on townscape, visual impact and built heritage has been undertaken by The Townscape Consultancy who are also preparing a HTVIA to be submitted alongside the planning application.

Baseline Conditions

- 3 The site lies immediately to the south of the Chiltern Railways line and is currently vacant. It is set back from Wembley High Road with access between No.406 and Nos.412 High Road. 390-406 Wembley High Road lies to the south and has recently gained consent for development of a part 13 and 17 storey building for student accommodation (Planning Reference 22/2225).
- 4 Construction is also underway on the adjacent site for the part 17 and 19 storey Wembley Link scheme (Planning Reference 18/3111) which is also set back from the High Road frontage. Part of this scheme opens a further east west route to the rear of the High Road frontage buildings. Development on the site will further contribute to this.
- 5 The site's location is part of this emerging high street route which is evolving into a more complex high street network with secondary routes and spaces.
- 6 Other taller buildings exist in the immediate context, including the 26-storey UNCLE Wembley development (approximately 150m west) and a large number of taller buildings set around Wembley Stadium forming Wembley Masterplan (Planning Ref. 15/5550), at its closest point 400m northeast of the site.
- 7 Site visits were undertaken by the Townscape Consultancy in March 2023. As a result of these site visits and initial consultation with the LBB, 17 townscape views have been identified and the heritage assets within a 1km radius mapped and those assets to be assessed have been identified. A 1km radius for assessing heritage is considered appropriate in a dense urban context where intervisibility is limited owing to the scale of intervening townscape.
- 8 The maps provided in **Annexes I and J** identify the 17 views identified for assessment and the heritage assets identified for assessment as part of the HTVIA.
- 9 The site is not located within a Conservation Area, and there are no listed or locally listed buildings on the site. There are several heritage assets within a 1km radius of the site. These are identified within **Annex J**.
- 10 As the closest heritage asset is 250m away, it is considered that the site does not lie within a heritage sensitive area. The site does not contribute to the setting of any of the heritage assets identified within the study area.
- 11 The following assets are within proximity of the site and are shown within **Annex J**. These will be assessed as part of the HTVIA for the planning application:
 - Wembley Arena (Grade II Building) (Map ref 1);
 - Roman Catholic Church of St. Joseph (Grade II Building) (Map ref 2);
 - No. 324 Harrow Road (Locally listed Building) (Map ref 3);
 - Wembley High Street Conservation Area (Map ref A); and



- King Edward VII Park (Locally listed Park) (Map ref i).

Discussion for Scoping Out

- 12** The provision of new buildings as part of the Proposed Development would have the potential to alter the existing townscape character and quality of the site and the surrounding townscape study area. Views in the local and wider area would also potentially be altered as a result of the Proposed Development. As such, the HTVIA will address the following potential impacts and likely effects, and will identify those effects which would be significant or not significant:
- Temporary change in townscape character, visual effects and the setting of above-ground built heritage assets during enabling and construction works;
 - Changes to the character, context and quality of the site and the local townscape;
 - Changes to selected views; and
 - Effects on the setting of nearby built heritage assets.
- 13** Construction activities may cause indirect effects on townscape, visual and heritage receptors as a result of a change to the receptor's setting. This will largely be limited to visibility of equipment associated with construction (cranes, hoarding, etc.). The effects during construction will be temporary and will transition in magnitude for receptors closer to the site being the largest and smallest for those further away. Significant effects during this time are considered unlikely.
- 14** The Proposed Development would rise to a maximum height of up to 22 storeys. The height would not be dissimilar to that of recently completed and emerging buildings situated in the immediate and wider locality.
- 15** The extent and magnitude of change caused by the Proposed Development would be limited in respect of townscape and views. It is considered it will be an enhancement, through its high-quality architecture. Therefore, significant effects on the townscape and views are considered unlikely.
- 16** In respect of heritage, there is the potential for some effects due to the location of heritage assets within the 1km radius of the site. It should be noted that larger scale modern development is part of the wider context and setting in which these are experienced today, and therefore potential for significant effects is considered very limited. It is expected that the Proposed Development would not cause harm to any heritage assets through a change in their setting. This will be as a consequence of replacing a vacant site with a scheme of high-quality architecture and urban design, which will open the site up to its surroundings and engage positively with Wembley High Road.
- 17** A HTVIA will be produced as a stand-alone report and this would consider the effect of the Proposed Development on views, areas of townscape around the site, and the settings of above ground heritage assets in the local area. The HTVIA will include a range of Accurate Visual Representations (AVRs) of the Proposed Development (produced by a specialist visualisation company). The HTVIA will be undertaken in accordance with the Townscape Consultancy's methodology which is written in line with the following planning legislation, policy and guidance:
- National Planning Policy Framework (2021);
 - Planning Practice Guidance, last updated June 2021;
 - The National Design Guide 2019;
 - The London Plan 2021;
 - Brent Local Plan 2019-2041;
 - Historic England: Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (March 2015);
 - The Setting of Heritage Assets: Historic England: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) December 2017;
 - Historic England Advice Note 4 - Tall Buildings (2022); and
 - Historic England Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage assets (October 2019).

Potential Cumulative Effects

- 18** There are several schemes consented and under construction in the surroundings of the site. Those relevant to assessment are identified in this screening letter. Cumulative heritage, townscape and visual effects are assessed on the basis of the additional effect as a result of the Proposed Development in addition to that of the



cumulative baseline. It is considered that none of the potential cumulative effect during construction or for the completed development will be significant.

Conclusion

- 19** In view of the above, significant effects on the townscape and heritage assets are considered unlikely. The heritage, townscape and visual effects of the Proposed Development will be assessed in a HTVIA, to be submitted alongside the planning application.
- 20** Therefore, the issue of Heritage, Townscape and Visual Impact is **scoped out of the EIA**.

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TOPIC SHEET

TRAFFIC AND TRANSPORT

Introduction

- 1 It is considered that significant effects relating to Traffic and Transport are unlikely and as such this topic is 'scoped out' of the EIA. The following section provides a summary of the baseline Traffic and Transport conditions and clarifying why no likely significant effects are expected.
- 2 The consideration of potential impacts on traffic and transport has been undertaken by Icen Projects Ltd, who are also preparing a Transport Assessment (TA), Framework Travel Plan (FTP) and a Delivery and Servicing Plan (DSP) to be submitted to support the planning application for the Proposed Development. This will include a detailed analysis of the site from a transport and access perspective, including the necessary assessments to determine the impact on the surrounding area / highway network as well as sustainable travel modes.

Baseline Conditions

- 3 The site is located on land to the rear of 390-406 High Road in Wembley and is currently predominantly occupied by hardstanding / car parking, with the rear covered by scrub and trees. Vehicular access to the site is provided from High Road by a currently unadopted route which runs adjacent to 410 High Road.
- 4 The site benefits from excellent connections to local public transport facilities, with the majority of it benefiting from a Public Transport Accessibility Level (PTAL) of 6a (with 6b the highest level). Wembley Stadium and Wembley Central rail stations are both within a close walking distance of the site, approximately 300m and 400m respectively, with Wembley Park London Underground (LU) station also available within a 1.5km walking distance. The rail stations provide access to Chiltern Railways at Wembley Stadium and Southern Railways / London Overground at Wembley Central. Wembley Central London Underground (LU), serviced by the Bakerloo line, lies approximately 400m west of the site and Wembley Park LU station, serviced by the Jubilee and Metropolitan lines, is also available within a 1.5km walking distance.
- 5 In addition, bus stops are located along High Road on either side of the site, the nearest of which is Cecil Avenue Stop SP, serviced by No. 18, 92, 182 and N18 located approximately 100m from the site. Further bus stops are available on Park Lane and Wembley Hill Road. These bus stops provide access to a high number of bus services providing frequent buses to a range of destinations.
- 6 Given the location of the site, there are a substantial number of amenities and services available within the immediate vicinity, including food shops, gyms, restaurants / bars etc. A full assessment of the connectivity of the site to these amenities, as well as the public transport facilities, will be provided within the TA which will include an Active Travel Zone (ATZ) assessment to review the local walking and cycle routes, which includes London Cycle Network 45 on High Road.
- 7 In summary, there is an excellent level of existing public transport facilities and amenities / services available within the local area which will ensure future student residents of the Proposed Development will not be reliant on private car ownership.
- 8 A site visit was previously undertaken to inform the condition of the surrounding highway network. The footway on High Road fronting the site is of generous width, approximately 6m wide and has been subject to recent upgrades in the form of re-paving alongside provision of trees, street lighting and required street furniture.
- 9 Along the site frontage, High Road operates under a two-way arrangement, with one lane eastbound, and two lanes (one of which is a bus lane) westbound.



- 10 Whilst no traffic surveys are required given the car-free proposals, as detailed in the 'Key Issues and Potential Effects' section, there is Department for Transport (DfT) traffic count data for High Road, shown to be approximately 100m east of the site. This DfT data provides two-way motor vehicle traffic flows on High Road for 2019, (showing traffic levels pre-Covid), which are as follows:
- 2020 Eastbound Flow – 7,712
 - 2020 Westbound Flow – 7,558
 - 2020 Two-way Flow – 15,270
- 11 Of the total 15,270 vehicles, 256 were classified as heavy goods vehicles (HGVs).

Discussion for Scoping Out

Enabling Works and Construction

- 12 During construction of the Proposed Development there is likely to be a short term, temporary increase in local traffic, which will include heavy goods vehicles (HGVs). This increase in traffic is likely to result in some temporary, localised disruption to road users, however, these will be short term effects typical of any construction project. The increase in trips on the local network as a result of construction traffic will be far less than 10%. They will be managed through the implementation of a Construction Logistics Plan (CLP), and it is therefore considered that, with the implementation of these secured mitigation measures, no significant long-term construction effects are anticipated.
- 13 The effects of construction traffic on ecology, noise and vibration and air quality, including dust deposition, has been considered within the relevant sections of this Request for an EIA Screening Opinion, primarily within the noise and vibration and air quality sections.

Completed Development

- 14 The Institute of Environmental Management and Assessment (IEMA) document 'Guidance Notes No.1: Guidelines for the Environmental Assessment of Road Traffic'¹ states that:

"Within the IEMA guidance, two broad rules are suggested which can be used as a screening process to limit the scale and extent of the assessment:

Rule 1: include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%); and

Rule 2: include any other specifically sensitive areas where traffic flows have increased by 10% or more."

- 15 The IEMA Guidelines also set out a number of potential environmental impacts which may require assessment, including:
- Severance;
 - Delay;
 - Amenity;
 - Fear and Intimidation;
 - Accidents and Safety; and
 - Hazardous Loads.
- 16 'Amenity', 'Fear' and 'Intimidation' can be considered together as they are strongly interrelated.
- 17 The Proposed Development for purpose-built student accommodation does not include for any car parking spaces, in line with the London Plan policy requirements. As such, the Proposed Development is expected to generate a very minimal level of vehicular traffic, predominantly linked to delivery and servicing vehicles. A multi-modal trip generation assessment will therefore be undertaken to determine the expected number of trips to be made by modes other than the private car, and this will be included in the TA.

¹ IEMA, (1993); *Guidance for the Environmental Assessment of Road Traffic*



- 18 Notwithstanding the above, and whilst it may be subject to marginal change as the scheme progresses towards a planning application submission, the initial multi-modal trip generation assessment has shown there is expected to be a total of 70 daily two-way vehicle trips associated with the proposed student accommodation. Of these, 42 are associated with deliveries / servicing, and the remaining 28 are student trips (taxi, car passenger and motorcycle trips). Of these, a robust assumption would be that 4 of the associated vehicles (equating to 8 two-way trips) will be made by HGVs.
- 19 Based on the DfT data previously detailed, the 70 two-way trips associated with the Proposed Development is less than a 1% increase on the 15,270 two-way vehicle movements shown in the 2019 dataset. With regards to HGVs, the 8 two-way trips will only be a 3.1% increase on the 256 recorded in the baseline situation. The increase of flows on the local highway network falls substantially short of the recommend IEMA Guidelines¹ for requiring further assessment. Based on the above, the assessment is considered to be overly robust given it does not account for the fact that the majority of these new trips will be linked trips which are already on the local highway network.
- 20 However, a more detailed review of each of the potential environmental impacts is undertaken below.
- 21 With regard to severance, given the car-free proposals, it is considered that the Proposed Development will not result in any significant level of vehicular traffic, as shown in the above assessment. As such, the Proposed Development is not expected to result in changes which could detrimentally affect perceptions of severance when the Proposed Development is complete and operational.
- 22 On 'Delay', the IEMA Guidelines refers to potential delays to drivers and to pedestrians, however, users of other modes can also experience delays, such as cyclists and those travelling by bus and rail. The Proposed Development is not expected to result in changes which could affect perceptions of driver delay due to the minimal level of vehicular trip generation as already noted. Similarly, with regard to bus delay, the limited vehicular traffic, along with the existing bus service provision and no proposed changes to speed limits or the road network layout would mean that no change to bus delay would be expected as a result of the Proposed Development, especially with the expected mitigation as set out in later paragraphs. It is considered that the Proposed Development will result in an improvement to rail delay, and delays for pedestrians / cyclists, given the increased connectivity / permeability of the site, and the provision of an enhanced and more pleasant environment for pedestrians and cyclists.
- 23 The Proposed Development is expected to result in changes which could positively affect perceptions of amenity, fear and intimidation during operation. The Proposed Development can be expected to be designed to create an attractive and secure environment with increased active frontages and natural surveillance though the site and improved pedestrian realm along the frontage.
- 24 Likewise, the Proposed Development is not expected to result in changes which could affect accidents and safety during operation given the car-free proposals.
- 25 The Proposed Development is not expected to generate or attract hazardous loads.
- 26 In summary, the Proposed Development is not considered likely to result in significant adverse effects in relation to: Severance, Delay, Amenity, Fear, Intimidation, Accidents & Safety and Hazardous Loads. Some beneficial effects may occur, however these are not considered to be significant.
- 27 Notwithstanding, the TA will fully assess the transport impacts of the scheme, with mitigation measures identified as appropriate. This work will be completed in close liaison with TfL and the LBB.
- 28 Alongside the TA, a Framework Travel Plan (FTP) and a Delivery and Servicing Plan (DSP) will also be produced in support of the planning application. These documents will consider the impact of the development on all modes of transport, and detail any mitigation that is considered necessary, regarding both onsite and offsite impacts.
- 29 Given the existing level of public transport infrastructure available within the vicinity of the site, reflected by the PTAL rating of 6a (the highest level), it is considered unlikely that the Proposed Development will result in any significant impact on these services. A full assessment of public transport impacts will be undertaken and provided within the TA.

Potential Cumulative Effects

- 30 An assessment has been undertaken of the identified cumulative schemes to determine their impact on the above findings.



- 31 It is anticipated that all of the identified cumulative schemes have been assessed by the LBB as part of the planning application process and therefore the impact of the construction traffic has been anticipated and prepared for by the borough, so as to not impact the local highway network.
- 32 Furthermore, the CLPs that will be required for these applications, including the Proposed Development, will set out mitigation measures to reduce overlap of vehicles where possible, and this is common practice for sites in developing locations such as this.
- 33 Like with the Proposed Development, the other cumulative schemes will also bring forward improvements to their respective sites and the surrounding area. Notwithstanding, it is also acknowledged that these cumulative schemes will result in additional travel movements on the local network.
- 34 It is pertinent to note that the Applicant for the site is also bringing forward a separate scheme, 390-406 Wembley High Road development (Planning Ref: 22/2225) which is located directly adjacent to the site. The Proposed Development will share the access road that is located between 408 and 412 Wembley High Road and will be delivered as part of Wembley High Road, albeit the level of movement will be minimal. In support of the Wembley High Road consented scheme, a Transport Assessment was undertaken which confirmed no significant effects on the transport network. The cumulative impact of traffic from the Proposed Development and Wembley High Road development accessing this road is therefore not considered to be significant in terms of Severance, Delay, Amenity, Fear, Intimidation, Accidents & Safety and Hazardous Loads during construction and operation.
- 35 The assessments undertaken within the TA regarding public transport impact etc will therefore consider these cumulative schemes and ensure they are accounted for when determining impact, and required mitigation.

Mitigation Measures and Design Recommendations

- 36 Increases in traffic generated during the construction period will be mitigated through best practice construction methods which will be detailed within a CLP subject to approval by the LBB and secured through an appropriate planning condition(s).
- 37 The car-free proposals ensure that there would be no substantial increase in vehicular traffic generated over the course of the day following the redevelopment of the site. There will be associated delivery and servicing trips, which will be fully assessed within the TA, but these will be limited, spread across the day, and predominantly form part of linked trips i.e. the vehicle is already on the highway network making a delivery to other locations nearby.
- 38 A DSP will be prepared which will set out full details on the proposed strategy for accommodating these vehicles, as well as the appropriate management measures to be implemented.
- 39 The Proposed Development will result in the generation of multi-modal trips by sustainable modes such as public transport, walking and cycling. However, the TA will include an assessment of these trips and will determine whether any mitigation is required. For public transport, this will include a 'Public Transport Impact Assessment' which will determine whether the existing capacity on the services is sufficient to accommodate the new trips, or if improvements will be required. For walking and cycling, the TA will include the ATZ assessment which will assess the existing pedestrian and cycle links to key destinations and suggest improvements that are considered necessary. Both of these assessments will be discussed and agreed with both the LBB and TfL.
- 40 Lastly, the Proposed Development will also incorporate cycle parking provision which will further promote the use of cycling as a mode of travel. Details on the type and number of cycle parking spaces will be provided within the TA.

Conclusion

- 41 The Proposed Development is not considered likely to result in significant environmental effects in relation to transport and access. A Transport Assessment (including draft Travel Plans, Delivery and Servicing Plan and Construction Logistics Plan) will be submitted to accompany the planning application.

Therefore, the issue of Traffic and Transport is **scoped out of the EIA**.

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TOPIC SHEET

WIND MICROCLIMATE

Introduction

- 1 It is considered that significant effects relating to Wind Microclimate are unlikely and as such this topic is 'scoped out' of the EIA. The following section provides a summary of the baseline Wind Microclimate conditions and clarifying why no likely significant effects are expected.
- 2 The consideration of the potential effects on wind microclimate as a result of the Proposed Development has been undertaken by GIA. A qualitative wind assessment has been undertaken to determine if the introduction of the Proposed Development would result in adverse effects which could be considered significant both within the site and the surrounding area.
- 3 Further CFD testing will be performed to assess the Lawson Comfort and Safety criteria¹. The planning application will be accompanied by a Wind Microclimate Assessment which will present the findings of this testing including any necessary mitigation measures.

Baseline Conditions

- 4 Within London, prevailing winds come from the south to west quadrant, with the maximum winds from the south-west. Windy conditions can be expected in areas densely populated by tall buildings.
- 5 The site location has shelter from the west by the relatively taller UNCLE Wembley (recently completed under Planning Ref. 15/4550) and Wembley Link (nearing completion, Planning Ref. 18/3111). Moving around to the south-west, the site is sheltered by the Best Western on the corner of High Road and Cecil Road, and moving to the south, the adjacent Land at Juncture of Cecil Ave & High Road scheme (19/2891), which once constructed will also provide shelter.
- 6 Based on the above assessment of the site, the existing baseline conditions are expected to be consistent with an urban wind environment which taller massing within the surrounding area provides both shelter as well as impacting wind speed and direction around the site. The wind assessment undertaken for the adjacent 390-406 Wembley High Road (Planning Ref. 22/2225) indicates that winter wind conditions for the baseline case are typically a mixture of standing and walking with no on site safety concerns at the locations measured.

Discussion for Scoping Out

- 7 The building massing and height associated with the Proposed Development at the site has the potential to alter the local wind environment.
- 8 It is recognised that throughout the enabling and construction of the Proposed Development, the use of cranes and the erection of the new structure may affect the local wind microclimate. However, given the scale of the Proposed Development and therefore the scale of the equipment to be used, these effects are not anticipated to be significant. It is also noted that these enabling and construction effects will be temporary in nature and are transitory, with wind conditions progressing from the current baseline conditions towards those of the final Proposed Development which are considered to be the worst-case scenario.
- 9 The site is sheltered from the westerly winds by the developments mentioned above. The southwest corner of the two towers of the Proposed Development are in line with the prevailing south-westerly wind which is expected to reduce the potential for downwash by buildings of their height. The podium level roof terrace which

¹ The Lawson comfort and safety criteria is recommended by BRE and CIBSE for wind microclimate assessments.



would be accessible by residents, between the two towers will act to capture downwash from the eastern tower, which will encourage airflow to remain high above the pedestrianised area to the south of the eastern tower.

- 10 The inclusion of the cumulative schemes to the south (390-406 Wembley High Road (Planning Ref. 22/2225) and Land at Juncture of Cecil Ave & High Road (Planning Ref. 19/2891)) are anticipated to provide shelter from the southern dominant winds, further improving the pedestrian comfort and safety of the cumulative scenario.
- 11 Initial CFD testing of the Proposed Development will be performed within its existing surrounds to assess the ground level pedestrian comfort and safety. If this identifies areas of raised winds, mitigation measures will be implemented to reduce these wind speeds and generate suitable conditions. This could include: recessed entrances, localised screens or landscaping. If required, mitigation measures will then be incorporated into the design of the Proposed Development and / or landscape design as appropriate to ensure there are no wind-related safety exceedances and all conditions onsite are suitable for their intended use.

Potential Cumulative Effects

- 12 A cumulative scenario will also be tested to determine the impact of the Proposed Development in the future surrounding context with the development of identified cumulative schemes (including the adjacent 390-406 High Road). In line with the above, if the testing identifies areas of raised winds, mitigation measures will be implemented to reduce these wind speeds and generate suitable conditions.

Conclusion

- 13 The Proposed Development is not considered likely to result in significant effects in relation to wind microclimate. Wind safety and comfort conditions both onsite and offsite are expected to remain suitable for their intended uses in both the existing and future surrounding context. CFD testing will be undertaken to further inform the detailed design, and a wind assessment will be submitted in support of the planning application.
- 14 Therefore, the issue of Wind Microclimate is **scoped out of the EIA**.