



Brent Civic Centre
Engineer's Way
Wembley
Middlesex HA9 0FJ

TEL 020 8937 5230
EMAIL paul.lewin@brent.gov.uk
WEB www.brent.gov.uk/localplan
7th January 2025

Dear Nimbus,

**Environmental Impact Assessment Screening Opinion Town and Country Planning
(Environmental Impact Assessment) Regulations 2017**

Proposal: Request for Screening Opinion as to whether an Environmental Impact Assessment is required for the proposed demolition of the existing buildings and structures on site and construction of 3 blocks rising to 18 storeys in its centre, and comprising up to 360 student bedspaces and 900sq.m. of commercial floorspace, including a small number of disabled parking spaces, ~274 cycle parking spaces, ~610sq.m. of internal communal amenity spaces, and ~289sq.m. of external communal amenity spaces.

Site: 7-8 Watkin Road, Wembley.

I write in connection to your screening request submitted on 16th December 2024. Reference has been made to Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations') "Requests for screening opinions of the relevant planning authority".

Upon review of the material supplied in association with the screening request from the applicant, plus other material that is mentioned in association with this screening opinion, the London Borough of Brent considers that the proposed development is not EIA development. As such it will not require an EIA to be undertaken to accompany any planning application for development described that incorporates the proposed mitigation measures to address potential adverse effects of the development as set out in this screening opinion.

As required by Regulation 6(6) of the EIA Regulations please find attached the Council's Statement of Reasons which provides full reasons for this conclusion.

If you require any further assistance, please do not hesitate to contact Paul Lewin, on telephone 020 7937 6710 or email paul.lewin@brent.gov.uk.

Yours sincerely,

Paul Lewin
Spatial and Transportation Planning Manager

EIA SCREENING OPINION STATEMENT OF REASONS
The Town and Country Planning (Environmental Impact Assessment) Regulations
2017

Description of proposed development – Request for Screening Opinion as to whether an Environmental Impact Assessment is required for the proposed demolition of the existing buildings and structures on site and construction of 3 blocks rising to 18 storeys in its centre, and comprising up to 360 student bedspaces and 900sq.m. of commercial floorspace, including a small number of disabled parking spaces, ~274 cycle parking spaces, ~610sq.m. of internal communal amenity spaces, and ~289sq.m. of external communal amenity spaces.

Site – 7-8 Watkin Road, Wembley.

Notes - The assessment of the proposed development's likely significant effects is in relation to the EIA Regulations only. The assessment does not imply any consideration of the planning merits of the proposals or indicate the likely success or otherwise of an application for planning permission.

Introduction

Nimbus, on behalf of SevenCapital, requested a screening opinion from London Borough of Brent (the Council) on 16th December 2024. Associated with this request, details of the site boundary, proposed development and an initial assessment of the potential impacts of the proposed development were submitted.

The Existing Site and Surrounding Area

The development site is located on Watkin Road to the northeast of Wembley Stadium. The site covers an area of approximately 0.13ha. The site comprises low rise red brick commercial units, currently operating as a vehicle repair shop and an art workshop. Further industrial buildings are located immediately to the south, west and east of the site. Further to the west and south, and to the north beyond the Wealdstone Brook are blocks of residential dwellings. The site is located within a site allocation (BCSA6) which is for mixed use redevelopment. Within the site allocation are the following land parcels:

- 1-4 & 9 Watkin Road - immediately to the west and south has had permission granted (22/3965) for redevelopment to provide a mixed use development of up to 27 storeys comprising 594 student bedspaces.
- 10-11 Watkin Road - permission was granted (18/3381 & 19/2750) for a 24 storey development comprising 229 residential units which has now completed.
- Remainder of the site allocation which includes 12 Fulton Road, 5-6 Watkin Road and 20-24 Watkin Road.

Immediately to the south (BCSA8) and south east (BCSA4) are two other site allocations located within and Wembley Growth Area/ Opportunity Area, which are subject to large scale redevelopment. Applications associated with these site allocations can be found in the 'Large Scale Development within the Vicinity' section below. As such, while the area has a mix of uses, formerly having being principally industrial / commercial in nature, it is changing to one that is anticipated through the Brent Local Plan to become predominantly residential in character with associated commercial / cultural uses.

The site has a current PTAL rating of 4 and is approximately 400m to the south east of Wembley Park London Underground Station.

The site is located within an Air Quality Management Area (AQMA) and an Air Quality Focus Area (AQFA). Given current and historic industrial use, there is a risk of contamination. The site also falls within Flood Zones 3 and 2 (surface, fluvial and tidal). Wealdstone Brook runs along its northern boundary. Parts of the site are therefore considered to have a high probability of flooding. Wealdstone Brook is designated as a Grade II Site of Interest for Nature Conservation (SINC) of Borough Importance. The properties on site are not statutorily or locally listed, or within a Conservation Area. The nearest listed building is the Grade II listed Wembley Arena and some telephone kiosks, approximately 200m to the south west of the site.

The Size and Design of the Proposed Development

The proposal is for the proposed demolition of the existing buildings and construction of 3 blocks, including one central block rising to 19 storeys, and two 'shoulder' blocks of a lower scale. The ground floor/lower levels will include 900sq.m. of replacement commercial floorspace, in addition to ancillary residential spaces, including cycle parking (274 spaces) and communal internal amenity spaces. All students will benefit from access to ~610sq.m. of communal internal amenity space spread throughout the building in the form of shared living spaces. The development will be car free with a small amount of disabled parking.

Information Provided in Support of the Request for a Screening Opinion

The request for screening opinion has been submitted with a supporting statement setting out an analysis of the likely environment effects of the proposal.

A Screening Opinion was also requested in 2022 for 1-4 & 9 Watkin Road, which was immediately adjacent to the proposed site and of a greater scale. The screening opinion provided by the Council found that the proposed development was not EIA development and that an EIA was not required to be undertaken. This information has been utilised, as necessary, to inform this EIA Screening Opinion.

Large Scale Development within the Vicinity

Within the vicinity there are currently the following applications for significant developments which have not yet commenced/ been completed to take account of when assessing the impact of the cumulative impact of the proposed development subject of this screening opinion in association with other developments:

22/3965 1-4 and 9 Watkin Road, Wembley, HA9 0NL. Demolition of existing buildings and construction of two new buildings to provide commercial floorspace (Use Class: E) and student accommodation bedspaces (Use Class: Sui Generis), associated access and highways works, amenity space, cycle parking spaces, disabled car parking spaces and refuse/recycling stores. **Granted 23/02/2024. Not started.**

23/0578 Olympic Way Office, 8 Fulton Road, Wembley, HA9 0NU. Demolition of existing building and erection of building for use as a purpose-built Further Education College Campus with associated plant at roof level, provision of hard and soft landscaping and cycle parking facilities, loading bay and accessible parking bays on Rutherford Road frontage and drop off bay on Fulton Road, subject to Deed of Agreement dated 14th March 2024 under Section 106 of Town and Country Planning Act, 1990 as amended **Granted 15/03/2024. Not started.**

17/3059 All Units, Stadium Retail Park, Wembley Park Drive & 128 Wembley Park Drive (fountain studios), HA9. Outline planning permission for demolition of existing buildings on site and provision of up to 85,000 sqm (Gross External Area, GEA) of new land use

floorspace (across 1.679 ha) within a series of buildings, ranging from 8 to 25 storeys in height, with the maximum quantum as follows:

- A1 - A4 (Use class) Retail, B1 Office and/or D2 Leisure and Assembly: up to 4,000 sqm; and
- C3 (Use Class) Residential: up to 57,000 sqm gross (approximately 680 units);

And either:

- D1 (Use Class) Non-residential institutions: up to 25,000 sqm; or
- A1 – A4 (Use Class) Retail, B1 Office and /or D2 Leisure and Assembly: up to 3,000 sqm; and C3 residential: up to 22,000 sqm; or
- D1 (Use class) Non-residential institutions: up to 16,000 sqm; and Sui generis (Use class) student accommodation
- up to 9,000 sqm; or C3 (Use class) Residential : up to 22,000 sqm (approximately 315 units)

Notwithstanding the above breakdown, the maximum quantum of floorspace by land use overall will always be 85,000 sqm GEA. No occupied residential or student living accommodation will be at ground level or below. **Granted 19/01/2021. Not started.**

15/5550 Olympic Way and land between Fulton Road and South Way including Green Car Park, Wembley Retail Park, 1-11 Rutherford Way, 20-28 Fulton Road, Land south of Fulton Road opposite Stadium Retail Park, land opposite Wembley Hilton, land opposite London Designer Outlet. Hybrid planning application, accompanied by an Environmental Impact Assessment, for the redevelopment of the site including:-

Full planning permission for erection of a 10-storey car park to the east of the Stadium comprising 1,816 car parking spaces of which 1,642 are for non-residential purposes, up to 82 coach parking spaces and associated infrastructure, landscaping and vehicular access. And Outline application for the demolition of existing buildings on site and the provision of up to 420,000 sqm (gross external area) of new floorspace within a series of buildings comprising:

- Retail/financial and professional services/food and drink (Use Class A1 to A4) up to 21,000 sqm;
- Commercial (Use Class B1) up to 82,000 sqm;
- Hotel (Use Class C1): up to 25,000 sqm;
- Residential (Use Class C3): up to 350,000 sqm (up to 4,000 homes) plus up to 20,000 sqm of floorspace for internal plant, refuse, cycle stores, residential lobbies, circulation and other residential ancillary space;
- Education, healthcare and community facilities (Use Class D1): up to 15,000 sqm;
- Assembly and leisure (Use Class D2): 23,000 sqm;
- Student accommodation (Sui Generis): Up to 90,000 sqm.

And associated open space (including a new public park) and landscaping; car and coach parking (including up to 55,000 sqm of residential parking and 80,000 sqm non-residential parking) and cycle storage; pedestrian, cycle and vehicular accesses; associated highway works; and associated infrastructure including water attenuation tanks, an energy centre and the diversion of any utilities and services to accommodate the development.

Subject to a Deed of Agreement dated 23 December 2016 under Section 106 of the Town and Country Planning Act 1990, as amended. Planning Permission Granted 23rd December 2016. A number of elements of the outline application are complete and operational whilst others are yet to begin construction. The following Reserved Matters have been approved in relation to the Outline application above, and are either under construction or have not yet started:

22/3208 Land to the east of Rutherford Way (NE01 – Yellow Car Park) - Reserved matters application in relation to hybrid planning permission 15/5550 (as most recently

amended by planning permission 20/2844) for the access, appearance, landscaping, layout and scale for Plot NE01 comprising the construction of a single building arranged on ground and 19 upper storeys providing 770 student accommodation units (Use Class Sui Generis) with ground floor ancillary communal floorspace and a private communal landscaped garden for student use as well as associated plant, cycle storage, refuse provision, other ancillary space and associated infrastructure and public realm including new pedestrianised estate roads, and works to Rutherford Way and Fulton Road including the provision of parking and loading bays, and the installation of hard and soft landscaping, lighting and other associated works. Information is provided to discharge the following conditions for Plot NE01; 1: Layout, Scale, Appearance, Access, and Landscaping; 17: Student Accommodation Demand Assessment 19(d): Cycle Storage; 19(e): Car Parking; 19(h): Wind; 19(k): Internal layout of buildings; 19 (l): Access; 20(d): Contours and ground levels; 20(f): Provision of green/brown roofs; 25: Cycle routes; 30: Wheelchair Accessible Accommodation; 36: Vibration levels; 38: Air Quality; 49: Phasing Plan. **Granted 15/12/2022 – nearing completion.**

21/2517 Land to the east of Rutherford Way (NE02) - Reserved matters application in relation to hybrid planning permission 15/5550 (as amended by planning permissions 17/0328, 18/2214 and 20/2844) for the access, appearance, landscaping, layout and scale for Plot NE02 comprising the construction of two buildings, ranging from 10 to 27 storeys in height, providing residential units with private communal residential landscaped gardens and terraces, and commercial floorspace as well as associated plant, cycle storage, refuse provision, other residential ancillary space and associated infrastructure and public realm including new pedestrianised estate roads, works to Rutherford Way including provision of parking and loading bays and Phase 1B of a new public park comprising the installation of hard and soft landscaping, informal play space, lighting and other associated works. Information is provided to discharge the following conditions for Plot NE02 and Phase 1B of the Northern Park; Layout, Scale, Appearance, Access, and Landscaping; 19(d): Cycle Storage; 19 (e): Motor Cycle and Car Park Provision; 19(h): Wind; 19(k): Internal layout of buildings; 19 (l): Access; 19(m): Daylight; 19(n): Private external space; 20(d): Contours and ground levels; 20(f): Provision of green/brown roofs; 20(h): Sustainable Urban Drainage Systems; 25: Cycle routes; 29: Playspace; 30: Wheelchair Accessible Accommodation; 36: Vibration levels; 38: Air Quality; 48: GLA Standards; 49: Phasing Plan. **Granted 22/10/2021 – nearing completion.**

21/2424 Land to the east of Rutherford Way (NE03) - Reserved matters application in relation to hybrid planning permission 15/5550 (as amended by planning permissions 17/0328, 18/2214 and 20/2844) for the access, appearance, landscaping, layout and scale for Plot NE03 comprising the construction of two buildings, ranging from 10 to 21 storeys in height, providing residential units with private communal residential landscaped gardens and terraces, and commercial floorspace as well as associated plant, cycle storage, refuse provision, other residential ancillary space and associated infrastructure and public realm including new pedestrianised estate roads, works to Rutherford Way including provision of parking and loading bays and Phase 1A of a new public park comprising the installation of hard and soft landscaping, a bandstand, a water feature, informal play space, lighting and other associated works. Information is provided to discharge the following conditions for Plot NE03 and Phase 1A of the Northern Park; 1: Layout, Scale, Appearance, Access, and Landscaping; 19(d): Cycle Storage; 19 (e): Motor Cycle and Car Park Provision; 19(h): Wind; 19(k): Internal layout of buildings; 19 (l): Access; 19(m): Daylight; 19(n): Private external space; 20(d): Contours and ground levels; 20(f): Provision of green/brown roofs; 20(h): Sustainable Urban Drainage Systems; 25: Cycle routes; 29: Playspace; 30: Wheelchair Accessible Accommodation; 36: Vibration levels; 38: Air Quality; 48: GLA Standards; 49: Phasing Plan. **Granted 22/10/2021 – nearing completion.**

24/1841 - Crescent House, 130-140 Wembley Park Drive - Demolition of the existing building and redevelopment of the site with a residential-led (Use Class C3) building with

flexible commercial/community floorspace (Use Class E/F) at ground level; new basement excavation; cycle stores and blue badge parking; refuse stores and plant rooms/equipment; hard and soft landscaping including part-naturalisation of the Wealdstone Brook; new play space; and all associated engineering and ancillary works. Further explanation (not forming part of the formal description of development set out above): The proposed development includes the construction of two linked buildings of 18-storeys and 31-storeys to provide 307 residential dwellings (Use Class C3). The development proposes 179sqm (GIA) of commercial floorspace (Class E) and 216sqm (GIA) of flexible commercial/community floorspace (Classes (E/F2)). Basement accommodation is proposed for plant and cycle storage. **Granted 11/12/2024 subject to completion of S106 legal agreement.**

20/0967 – Wembley Park Station Carpark and Train Crew Centre - Comprehensive mixed-use redevelopment of the site comprising the phased demolition of the existing buildings and structures on site and the phased development comprising site preparation works, provision of five new buildings containing residential uses, replacement train crew accommodation and flexible retail floorspace, basement, private and communal amenity space, associated car parking (including the part re-provision of station car parking), cycle parking, access and servicing arrangements, refuse storage, plant and other associated works and subject to a Deed of Agreement dated 13 October 2021 under Section 106 of the Town and Country Planning Act 1990, as amended. **Granted – 22/02/2022 – started**

23/3440 - 1-22 Brooke Avenue Wembley - Demolition of all buildings and structures and comprehensive redevelopment of the site to provide two linked blocks of between 6 and 15 storeys (including mezzanine storey) comprising large scale purpose built shared living (LGPBSL) units (sui generis) and two linked blocks of between 4 and 9 storeys comprising residential units (Use class C3), ground floor commercial/community use units (Use class E/F), ancillary facilities and shared internal and external amenity space, associated highway works, blue badge parking, cycle parking, refuse stores, landscaping and access arrangements. **Granted 16/10/2024 subject to completion of S106 legal agreement.**

21/2989 – Euro House, Fulton Road - Demolition and redevelopment of the site to provide erection of five buildings ranging from ground plus 14 to 23 storeys; comprising residential units, retail floorspace and workspace / storage floorspace, private and communal amenity space, car parking, cycle parking, ancillary space, mechanical plant, landscaping and other associated works (phased development), subject to a deed of agreement dated 24/03/2022 under Section 106 of the Town and Country Planning Act 1990. APPLICATION SUBJECT TO AN ENVIRONMENTAL STATEMENT. **Granted – 25/03/2022 – Started.**

18/4767 – Access Storage, First Way - Demolition of the existing building and erection of 5 buildings ranging from 10 to 24 storeys comprising 7,307 sqm of self-storage space (Use Class B8), 1,335 sqm of office space (Use Class B1) and 280 sqm of retail space (Use Class A1/A3) at ground, first and second floor levels, 555 residential units (Use Class C3) on the upper levels, new landscaping and public realm, ancillary servicing and plant, car and cycle parking, and associated works. **Granted - 30/03/2023 – Not started.**

21/2130 – Olympic House, 3 and Novotel, 5 Olympic Way - Demolition of existing building at 3 Olympic Way and erection of 3 buildings of basement, ground and 9, 22 and 25 storeys (excluding rooftop plant) to provide 178 residential units (Use Class C3), new hotel accommodation comprising 260 rooms (Use Class C1) and a retail food store (Use Class E). 6-storey extension to existing hotel at 5 Olympic Way to provide 95 additional hotel rooms (Use Class C1) and amenities, extension of ground floor to create new colonnade and public realm improvements to Olympic Way. Other works associated with development include new access from North End Road, disabled car parking, cycle parking, private and communal amenity spaces, public realm works and other associated works – **Awaiting S106.**

Other Environmental Assessments

Regulation 5(5)(b) of the EIA Regulations requires the relevant planning authority to take into account the results of any relevant EU environmental assessments.

Development Plan

The Brent Local Plan (2019 – 2041) was adopted at Full Council on the 24th February 2022 and is the key strategic document to guide and manage development in the borough. The development plan also comprises the West London Waste Plan (2015) and the London Plan (2021). Together these documents provide spatial policies, development management policies and site allocations to guide and manage development in the borough.

An Integrated Impact Assessment (IIA) accompanies the Local Plan, which incorporates the SA and SEA – that consider the potential for significant economic, social and environmental effects. This document has been considered when generating the EIA Screening Opinion. The SAs satisfied the requirements of the EC Directive 2001/42/EC and Strategic Environmental Assessment (SEA) Regulations on the assessment of the effects of certain plans and programmes on the environment.

These documents have been referred to when generating the EIA Screening Opinion.

Legislation

The proposed development does not fall within any of the descriptions of development listed in Schedule 1 of the EIA Regulations, and is therefore not a 'Schedule 1 development'. The development does, however, fall within the description of a Schedule 2 development, classified under item 10 (b) as 'urban development projects'.

'Schedule 2 development' means development (other than exempt development – which this is not) of a description mentioned in Column 1 of the table in Schedule 2 where:

- a) any part of that development is to be carried out in a sensitive area; or
- b) any applicable threshold or criterion in the corresponding part of Column 2 of that table is respectively exceeded or met in relation to that development.

No part of the proposed development is to be carried out in a 'sensitive area' as defined by the EIA Regulations.

The threshold for item 10(b) is as follows:

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

The proposal is for up to 360 student bed spaces and 900sqm commercial Class E(g) floorspace. For the purpose of undertaking the EIA Screening, student accommodation is not specifically addressed in the regulations. If using the 2.5 student bedspaces to one dwelling ratio in accordance with the London Plan 2021, the scheme would provide the equivalent of circa 144 new conventional homes. This is below the indicative threshold requiring a screening opinion. Schedule 2, 12(c) also notes an indicative threshold of 300 hotel bedspaces, which could be considered comparable to generating similar rates of activity to student bedrooms, which the proposal does exceed. Given the ambiguity around EIA screening for student accommodation and the applicant's submission of a screening request consideration has therefore been given to whether the proposed development may give rise to significant environmental effects, such that an EIA may be required.

Likely Significant Effects

The ultimate stage in the screening process is to consider whether it is '*likely to have significant effects on the environment by virtue of factors such as nature, size or location*'. As required by regulation 5(4)(c), where a relevant planning authority has to decide whether Schedule 2 development is EIA development, they must take into account the selection criteria set out in Schedule 3 as are relevant to the development.

The Council has taken into account the selection criteria set out in Schedule 3, where relevant to the proposed development. This includes the characteristics of the development, the environmental sensitivity of geographical areas likely to be affected, and the likely significant effects in relation to these criteria, with regard to the factors specified in regulation 4(2) and taking into account the types and characteristics of the potential impact listed in paragraph 3.

In addition, as required by regulation 5(5)(a), where the relevant planning authority adopts an EIA Screening Opinion they must state the main reasons for their conclusion with reference to the relevant criteria listed in Schedule 3. Within this Statement of Reasons, the Council has stated the main reasons for their conclusion, referencing the relevant criteria listed in Schedule 3 as appropriate.

The Council has concluded that the proposed development does not require an EIA to be undertaken to accompany a planning application for the proposed development as the proposed development is not likely to generate significant environmental effects – Appendix A (below) sets out the reasoning for this decision.

Appendix A – Consideration of Likely Significant Effects

Air Quality

The site is located within the Brent Air Quality Management Area (AQMA), and an Air Quality Focus Area (AQFA) respectively. The majority of Brent has been designated as an AQMA, and therefore even small increases in emissions can lead to adverse effects. The AQMA has been declared for exceedance of the annual mean national objective for nitrogen dioxide (NO₂) and the 24 hour mean national objective for particulate matter (PM₁₀). Brent has a total of 21 AQFA's, incorporating the 11 identified by the London Mayor in addition to 10 further sites identified by the Council. These are designated in locations that not only exceed the EU annual mean limit value for nitrogen dioxide (NO₂), but are also locations with high human exposure, such as within and around the residential areas of the Wembley Growth Area.

There are a number of sensitive receptors in close proximity to the proposed development site, including the residential properties, student accommodation and businesses.

Documentation Accompanying the Planning Application: *It is anticipated that an Air Quality Assessment (including Air Quality Positive Statement) and a Transport Statement (including Healthy Street Assessment and Travel Plan) will accompany any forthcoming planning application.*

Construction

Machinery used during construction can generate new sources of emissions, as well as traffic movements to/from the site and the works themselves. When assessing the effect of dust emissions generated during construction works, receptors are defined as the nearest potentially sensitive receptor to the boundary of the site in each direction. These receptors have the potential to experience effects of greater magnitude due to emissions of particulate matter generated by the works, when compared with more distant receptors.

The receptors in close proximity to the site, combined with the new emissions, means that there is the potential for adverse effects as a result of the construction proposed development.

Whilst there is the potential for adverse effects, with the implementation of standard best practice measures, it is not anticipated that the effects would be significant. Taking account of these practices the effect of dust soiling and PM₁₀ is likely to be reduced to negligible with the implementation of appropriate mitigation measures. These may include: No idling vehicles; Erect solid screens or barriers around dusty activities or the Site's boundary; Loads entering and exiting the Site are covered; Where practicable use mains or battery powered generators over fuel burning; Other dust suppression measures e.g. damping down with water; and all constructions vehicles and equipment to comply with relevant EU stage ratings. These standard mitigation measures can be implemented through a construction environmental management plan (CEMP), which can be secured through a standard planning condition.

As such, whilst there is the potential for adverse effects as a result of the proposed construction, with the implementation of standard mitigation measures, it is not anticipated that the effects would be significant and impacts are considered to be temporary.

Operation

Air quality emissions during operation will be from new traffic generation and heating systems, although the proposal is to be car free and use heat pumps. Consideration also needs to be given to the potential effects on the new internal receptors given the location for the proposed development adjacent to a relatively heavy trafficked road. The Council is likely to seek technical reports that show how at least an air quality positive development can be achieved.

The supporting statement does not confirm the quantity of parking spaces which will be provided on site, but the description of development only proposes disabled parking and cycle parking. Therefore, it appears that limited vehicle parking will be provided on site and this will consist only of disabled parking provision. This reflects the site's relatively accessible location in terms of travel by foot, cycle and public transport. It is likely that any impact to the local population arising from vehicle and pedestrian movements would be related to the proposed commercial uses and the student accommodation units, however sustainable methods will be encouraged through cycle parking provision and facilitated by close proximity to Wembley Park Underground Station plus bus routes.

Parking controls are likely to be increased in the surrounding area to deal with potential displacement off-site. This, along with measures to support walking, cycling and public transport is likely to reduce private car use. Taking this into account the level of net traffic generation resulting from this development is likely to be negligible. As such emissions from vehicle movements will be minimal, and therefore effects are not considered to be significant.

As noted, heating is to be provided by heat pumps which result in minimal local emissions. The proposal, in accordance with policy, also intends to achieve BREEAM 'Excellent' which will potentially further reduce emissions associated with the operation of the development.

Consideration also needs to be given to the potential effects on the new internal receptors given the location for the proposed development adjacent to in part to a relatively heavily trafficked road and within an AQMA and AQFA.

Mitigation

The Council will seek an air quality positive development. During the construction phase a CEMP should be implemented which implements suitable measures to reduce the impact of dust and emissions. This can be secured via planning conditions.

The developer should consider the potential impact of air quality and dust on occupational exposure standards (to minimise worker exposure) and breaches of air quality objectives that may occur outside the site boundary. Continuous visual assessment of the site should be undertaken and a complaints log maintained in order determine the origin of a particular dust nuisance.

For the operational phase, suitable mitigation to be secured through a planning condition to ensure that new internal receptors are adequately protected.

The supporting statement advises that the proposal is not anticipated to have any negative effect on Air Quality. Suitable conditions associated with the Transport Statement (including Healthy Street Assessment and Draft Travel Plan) and measures to reduce reliance on the private car, for example through provision of sufficient cycle parking and potential S106 contributions to implementing a wider controlled parking zone will ensure reductions in impact through vehicle movements.

Local Heritage

Documentation Accompanying the Planning Application: *A Heritage, Townscape and Visual Impact Assessment and Archaeological Report, and Design and Access Statement, is likely to be required for any future planning application.*

The Site does not lie within or near a Conservation Area or an Archaeological Priority Area. Brent Town Hall, approximately 570 m north of the Site is Grade II listed. Wembley Arena (formerly the Empire Pool), plus some telephone kiosks approximately 470 m to the south-west of the Site are Grade II listed buildings. The closest scheduled monument to the Site is a 'Medieval moated site, 454 m south-west of Sudbury Golf Club House', which is approximately 3.2 km to the south west of the Site. It is also close to the National Stadium Wembley which is subject to Local Plan policies seeking to protect longer distance views to it and in particular its arch.

The impact of the scale and height of the proposed buildings through the Design and Access Statement and Townscape and Visual Impact Assessment and Archaeological Report will allow sufficient clarity of impact on the setting of features of historic or cultural importance and Conservation Areas.

It is likely for the most part to be visually separated from listed buildings by development currently constructed as well as that likely to be constructed as a result of other development within the Wembley Growth Area, especially that immediately to the west. The justification of the heights and form of the development together with its impacts on the setting of the stadium/longer distance views can be set out in Design and Access Statement and the Townscape and Visual Impact Assessment.

The site has already been subject to significant urban development and can be considered to have a generally low archaeological potential for all past periods of human activity. Past post depositional impacts are considered severe as a result of previous development. On the basis of the available information no further archaeological mitigation measures are recommended in this particular instance.

The Council considers that given the scale of the development, particularly its being subservient to adjacent granted development, and the urban nature of its location the proposed development would not lead to significant adverse environmental effects on heritage assets, as such an EIA is not required in respect of heritage and cultural impacts.

Climatic Factors

Documentation Accompanying the Planning Application: *The following will need to be submitted alongside a planning application: Wind Microclimate Assessment, Overheating Assessment, Sustainability Statement, Whole Life-Cycle Carbon Assessment, Energy Statement including BREEAM Pre-Assessment, Circular Economy Statement.*

Construction

Emissions from construction traffic and plant can contribute towards the region's greenhouse gas emissions. Due to the size of the proposed development the emissions are not considered to be substantial, and therefore no significant effects are anticipated. Supporting information notes that electromagnetic radiation, heat and energy releases are expected to be those associated with normal construction operations and activities. It is advised that sustainable methods of working should be implemented to reduce any emissions, and should be implemented as part of the CEMP.

Operation

It is considered that the proposed development will be able to achieve the necessary carbon reduction targets, through actual reductions such as through achieving the target BREEAM score, combined with financial contributions secured through a planning obligation. The effects of which are beneficial, but are not considered to be significant. Supporting information notes that sustainable design and construction will be a key aspect of the proposals, ensuring compliance with regional and local planning policies.

Mitigation

A CEMP should be secured that includes measures to reduce emissions e.g. management of plant to prevent plant running when not in use.

The s106 will need to be worded to ensure that any required carbon reduction off-set payments are secured.

Taking account of the above the Council does not consider that the environmental impacts related to climate change are significant enough to warrant EIA.

Contaminated Land

Documentation Accompanying the Planning Application: *a phase 1 Ground Conditions Report will accompany any forthcoming application.*

The site is within a historically industrial area and has been used for industrial purposes for some time and most recently (for no. 7) a tyre repair shop. Based on the site's historical and current use, there is the potential for sources of contamination related to its and the surrounding land uses. To ascertain the likely level of contamination, a Phase 1 ground conditions survey / Land Contamination Assessment will be submitted as the part of a planning application process as described above.

Although not explicitly contamination, it is noted that Japanese knotweed is present on site and will be removed prior to commencement of works.

Construction

During construction there is considered to be a low likelihood of fuel leakages / spills from construction vehicles. A CEMP would be implemented to manage potential effects. In addition, there is the risk of exposure to contaminated materials and opening up pathways to underlying substrata. Standard mitigation measures will be required during the construction of the proposed development, to ensure that the works are undertaken in an appropriate manner. These should be secured through conditions in agreement with the Council's Contaminated Land Officer. With the implementation of these mitigation measures, no significant effects are considered likely.

Operation

With the implementation of any required impact avoidance measures as part of the construction phase, no significant effects are anticipated at operation.

Mitigation

Standard construction mitigation measures should be secured through the CEMP and through conditions in agreement with the Council's Contaminated Land Officer.

A comprehensive contamination assessment will be undertaken as part of the planning application to ensure any significant effects arising from contamination are mitigated.

Taking into account the above, the contamination issues are not so significant as to warrant and EIA.

Daylight, Sunlight and Overshadowing

Documentation Accompanying the Planning Application: *A Daylight, Sunlight and Overshadowing Assessment will be submitted as part of the planning application process.*

There are a number of sensitive receptors in close proximity to the proposed development site, including residential properties, students and businesses.

Construction

During construction, there will be a change in the provision of daylight/sunlight due to the construction equipment (i.e. cranes) and the erection of the new buildings.

The construction equipment will be temporary and short-term, and therefore not considered to be significant.

The erection of the new buildings will generate some adverse effects as it is built out. The construction effects will however be no greater than the completed, operational development, which are not considered to be significant.

Operation

The operation of the proposed development will introduce buildings of up to 19 storeys. Due to the proximity of nearby sensitive receptors, including those proposed at the neighbouring site, and the height, there is the potential for the proposed development to affect surrounding receptors. The applicant has commissioned consultants Point 2 Surveyors to undertake an initial assessment to inform their screening statement. This concludes that although, given the proposed scale is significantly greater than existing, some impacts will be anticipated, the proposal is anticipated to result in acceptable outcomes with regards to existing and proposed receptors. Some properties may be adversely affected by the proposed development, however given the site's urban location, the effects are not considered to be significant.

Mitigation

The applicant's consultants are currently in conversation with the Council with regards to the forthcoming planning application. Any future planning applications will be subject to a full assessment of daylight, sunlight and overshadowing impacts. Taking account of the above it is considered that the environmental impacts in relation to daylight, sunlight and overshadowing would not be so significant to warrant EIA.

Biodiversity (including flora and fauna)

Documentation Accompanying the Planning Application: *An Ecological Impact Assessment, Tree Survey and Arboricultural Impact Assessment will be submitted with any full planning application.*

The site contains no areas of statutory nature conservation and there are no such sites within the immediate vicinity of the site. There are no SPA, SAC or Ramsar designations

within 5km of the Site. There is a single SSSI within 5km of the Site, namely Brent Reservoir SSSI, approximately 1.5 km north-east of the Site. Masons Field (Fryent Country Park) Local Nature Reserve (LNR) is approximately 1 km to the north of the Site and Brent Reservoir / Welsh Harp LNR is approximately 1.5 km to the north-east of the Site. Fryent Country Park LNR consists of meadows, ponds, lakes, hedges and woodland. Brent Reservoir / Welsh Harp LNR consists of open water, marshes, trees and grassland and the reservoir includes associated waterfowl. Last assessed on 20th March 2019, Brent Reservoir was identified as being in favourable condition, having a good breeding bird assemblage on the open water and fen habitats across the site.

The supporting information states that there are no significant ecological features or areas of usable open green space on the site. However, the northern part of the site is located adjacent to Wealdstone Brook, which is a SINC of Borough Importance Grade II. Last reviewed in 2014, the review of the SINC notes that the habitat could potentially support birds, invertebrates and foraging bats. It notes that it has limited biodiversity interest, but may form a foraging or commuting route for bats and therefore has a moderate level of importance. The review also notes that the brook's associated belt of woodland serves an important wildlife corridor, with dominant tree species of Ash and Sycamore with Hawthorn and Holly.

Construction

Depending on the findings of the Ecological Impact Assessment, a range of standard mitigation measures may be required to reduce potential adverse impacts on biodiversity, such as timing of demolition/ construction activities, relocation of bats and controls on lighting.

The application site is adjacent to a water course, the Grade II SINC Wealdstone Brook. There is a potential risk of water contamination from run off during demolition and construction. The potential for contamination risk should be dealt with through the implementation of appropriate mitigation in the demolition and construction phase (to be secured by standard planning condition). It is not considered that the construction of the proposed development will have a significant effect on the integrity of statutory or non-statutory nature conservation designations or protected species and the potential for conservation requirements and objectives would not be diminished.

Operation

As the existing land comprises warehouses and hard surfacing, there is the potential for the proposed development to beneficially contribute to biodiversity of the local area through the implementation of ecological enhancement measures e.g. naturalisation of the river or enhancement of its bio-diversity, plus inclusion of bat roosting opportunities, bird boxes, green roofs and a wider range of green infrastructure on site that encourages bio-diversity. Supporting information states that the proposals will include an uplift in ecological benefits through the soft landscaping proposals compared to the existing situation.

Mitigation

Suitable conditions should be in place to ensure potential adverse impacts on any existing protected species are minimised during prior to and during works on site, as well as incorporation of suitable features to encourage bio-diversity resources as part of the development. The potential for contamination risk should be dealt with through the implementation of appropriate mitigation in the demolition and construction phase (to be secured by standard planning condition). Mitigation measures and compliance with

regulatory waste disposal controls and hazardous material management would be set out in a CEMP.

Taking account of the above no significant environmental effects should arise which would require the need for an EIA.

Flood Risk

Documentation Accompanying the Planning Application: *A detailed Flood Risk Assessment / Drainage Statement will be undertaken as part of the planning application process.*

The site is located directly to the south of Wealdstone Brook and is located within Fluvial Flood Zones 2 and 3a and Flood Zone 3 for surface water. The flood risk extent for the climate change scenario is significantly greater. It is therefore considered to have a high probability of flooding.

Construction

The majority of the site is within Fluvial Flood Zone 3a, although the majority of the portion fronting Watkin Road, where development is likely to be placed, is outside of this area. Part of the site on the Watkin Road frontage is surface water 3a. Therefore, in the construction process there is generally considered to be limited risk to property and people. The development will be expected to take a sequential approach in locating buildings wherever possible away from flood zone 3, thus reducing the risk of flooding to property on site and reducing flood storage/ impacting on hydrology resulting in increased flooding elsewhere. Easy access to land outside flood zone 3 on site should allow construction personnel to move to areas away from flood risk.

Operation

The applicant has been in conversation with the Environment Agency (EA) to help ensure the proposed development is safe and does not increase the risk of flooding elsewhere. Therefore a number of adaptation and mitigation measures have been proposed, including increasing ground floor levels 600mm above flood levels; equivalent floodplain compensation; inclusion of an appropriate and bespoke climate change allowance; ensuring basements are watertight, not placing residential uses at the basement level; incorporating SuDS.

Pedestrian routes will be required to allow safe passage to areas outside the flood zone. This will be formally set out in a Flood Emergency and Evacuation Plan. The development will also need to be flood resilient for the non-student accommodation built elements if they are at risk of flooding. The FRA must seek to ensure that the proposed development will not increase flood risk to occupants and off-site. The applicant should refer to Brent's SFRA Level 2.

Mitigation

The development must be located and designed so as not to increase risk of flooding. Any potential significant effects can be mitigated through mitigations such as planning conditions or a S106 agreement. Implementation and management of surface water run-off should be secured through a planning condition, and a detailed drainage plan must account for 100% of surface water generated from the site in a 1 in 100 +40% climate change event and comply with London Plan policy and non-statutory technical standards for SuDs.

Taking account of these matters it is considered that the development will not have significant effects that warrant the need for EIA.

Human Health

It is considered that human health (both of existing and new receptors) has been appropriately considered within the relevant topic sections (e.g. water contamination or air pollution) and as such, reference should be made to these sections as required.

In addition to the above, the supporting information includes a section on socio-economics and health. In terms of health, this identifies that the student bedspaces will be accompanied by communal floorspace, including share cluster spaces to allow for social interaction and reduce the potential for loneliness. The design is also including Secure by Design measures, which will reduce the potential for crime in the area. Taking into account the above, it is considered that the development will not have significant effects that warrant the need for EIA in relation to human health.

Land (land take)

The construction and operation of the proposed development will utilise brownfield land to provide commercial space and student accommodation units dwellings. This is not considered to generate any significant effects. No discipline specific mitigation has been relied upon for the EIA Screening Opinion.

Material Assets

The construction and operation of the proposed development will utilise material assets, but given the scale of the development this is not considered to be substantial. As such, significant effects are not considered to be likely. No discipline specific mitigation has been relied upon for the EIA Screening Opinion.

Major accidents and/or disasters

Documentation Accompanying the Planning Application: *A Fire Statement will accompany a planning application submission.*

The supporting information states that, given the proposal will be built in accordance with all necessary safety requirements, the risk of accidents in association with the development is not considered likely to result in significant effects. A Fire Statement will be submitted in accordance with policy to demonstrate how the design of the scheme seeks to reduce the risk of major accidents in relation to fire.

It is considered that the risk from major accidents and/or disasters (both of existing and new receptors) has been appropriately considered within the relevant topic sections (e.g. climate change, flood risk) and as such reference should be made to these sections as required.

Noise and Vibration

Documentation Accompanying the Planning Application: *A Noise Impact Assessment will be submitted with the planning application for the proposal.*

The existing roads bordering the site and nearby railway line (~140m to the north) currently are dominant sources of noise in the area. Moderate levels of noise from the adjacent light industrial uses (including a vehicle repair shop) is also possible, and elevated levels of noise

and activity likely during major sporting / cultural events. During the evening / night time hours, noise might also be influenced by the evening leisure economy.

Construction

Machinery used during demolition/construction on site can generate new sources of noise, as well as construction traffic movements in the vicinity. The nearby receptors combined with the new noise emissions, means that there is the potential for adverse effects as a result of construction activities.

Given the scale of the development, standard impact avoidance measures can be implemented to reduce emissions from construction activities, which will be secured through the CEMP. In the context of traffic movements around the site, the level of construction vehicle movements will not be exceptional. No significant effects are therefore anticipated.

Operation

With the exception of disabled parking, no additional general car parking is proposed as part of the development scheme. There are likely to be deliveries to residents and commercial properties as well as waste removal, but in an urban context the impacts will be limited. As such, there is not considered to be any significant effects from traffic noise.

The proposed commercial and student accommodation use is not considered to be inherently noisy. Some noise may be generated from the operation of mechanical plant and building services, but plant noise emissions will be required to meet local policy requirements and British Standards. Adherence to these values will ensure that new and existing receptors are not adversely affected, and will ensure that there will be no significant effects.

There is the potential for new residents to be affected by adverse noise due to the site's location, with possible moderate levels of noise from adjacent light industrial uses and elevated levels of noise and activity during major sporting / cultural events, in addition to the evening leisure economy. The Noise Assessment should consider how new residents can be protected through the appropriate design of the proposed development. The proposed development can therefore be designed with consideration to the location of the development and the potential noise implications – secured through planning conditions.

No significant effects are therefore anticipated.

Mitigation

Adherence to the CEMP should be secured through a planning condition, the CEMP will include standard mitigation measures to reduce noise emissions. Plant noise should be controlled to local and national guidelines using a planning condition.

Suitable mitigation will be required to be included within the design of the proposed development to ensure that new internal receptors are adequately protected.

Taking account of these matters it is considered that the development will not have significant effects that warrant the need for EIA.

Socio-Economic (including population)

Documentation Accompanying the Planning Application: *The Planning Statement and Statement of Community Involvement might give an indication of current land use and number of jobs within the site and compare this with what is proposed.*

Construction

The proposed development would create benefits to local employment though providing temporary employment during construction, with an associated increase in spending in the local and regional area. This is considered to be beneficial, but not significant.

Operation

The proposed development would create benefits to local employment though providing permanent employment once operational (through the creation of commercial floorspace and servicing the student scheme). The future residents are also expected to generate economic growth within the local area through expenditure.

The development will increase demand for local social infrastructure. Community Infrastructure Levy (CIL) payments will be sought to offset the effects of the development. These financial contributions will mitigate adverse effects, so that significant effects are unlikely.

Mitigation

Financial contributions through CIL will be sought to mitigate the effects of increased population/ users.

Taking account of these matters it is considered that the development will not have significant effects that warrant the need for EIA.

Soil (organic matter, erosion, compaction, sealing)

Construction

There is the potential for some loss of organic matter, erosion, compaction and sealing during the demolition/construction phase; however, given the scale of the development and the length of the demolition/construction phase, effects are not considered to be significant.

Operation

The operation of the completed development is not anticipated to unusually affect organic matter, erosion, compaction and sealing. As such, significant effects are not considered to be likely.

Mitigation

The implementation of a CEMP during the construction phase will ensure that standard mitigation measures are implemented.

Telecommunications

Documentation Accompanying Planning Application: *A TV / Radio Reception Assessment will be submitted as part of the planning application process.*

The height of the buildings may impact on the quality of television reception in the near locality. A TV / Radio Reception Assessment was submitted for the adjacent 1-4 & 9 Watkin Road site under 20/0587. This found that interference to the reception of TV or radio services was unlikely. The proposal is smaller in scale and massing than the adjacent development. As such, on the basis of information provided with other sites in the vicinity the impact is not to be significant.

It is considered that there is no known significant likelihood at this stage, of detrimental effects from or on telecommunications that would warrant the submission of an EIA.

Townscape and Visual Impact

Documentation Accompanying the Planning Application: A Heritage, Townscape and Visual Impact Assessment will accompany the planning application and should identify the extent to which the development impacts on skyline and protected views. The National Stadium is subject to local policy for protection of views to it from various locations across the borough.

Construction

The construction works are likely to require large cranes/ equipment, and therefore there is the potential for adverse effects on views and townscape. That said, given the relatively short term, temporary nature of the construction works and the scale of the development, effects are not considered likely to be significant. Supplementary mitigation can be implemented through the use of hoarding, to provide a physical/visual barrier to the works.

Operation

The proposal is up to 18 storeys, and is therefore of a greater scale than that previously on site. The context within which it sits however currently includes tall buildings in the near vicinity, with the prospect of more. This particularly regards adjacent sites within the BC SA6 site allocation, and that to the south of Fulton Road as set out in the approved masterplan accompanying planning permission 15/5550. Immediately adjacent sites, including 1-4 & 9 (27 storeys) and 10-12 Watkin Road (24 storeys) are of a greater scale. Quintain masterplan plot NE05 to the south of Fulton Road has the potential to be up to 104.5 metres above proposed ground floor levels (~23 storeys). Therefore whilst the scale of the proposal is significant, it remains subservient to other existing/proposed buildings within the immediate area. The scale and massing of the proposal, such as the positioning of the tallest element, has been design to ensure the integrity of the protected views of Wembley Stadium remain intact when considered alongside adjacent development. So far this has been tested using 3d modelling software, however, going forward it will be evidenced in a full Heritage, Townscape and Visual Impact Assessment which is currently being prepared.

Assessments submitted with adjacent applications have found no significant adverse impacts related to those proposals. As such, the Council considers that although the proposed development could lead to some adverse effects on townscape and views, given the scale of the development and the urban nature of its location, significant effects are not considered likely.

As such it is important to note, that whilst the effects are not considered to be significant in relation to the EIA Regulations, this does not preclude the Council from taking into account the adverse effects (and their acceptability) when determining the planning application.

Mitigation

During construction, ensure the erection and maintenance of hoarding. Design, height and massing to reduce potential for adverse impact, can be taken into full account at application stage.

Taking account of these matters it is considered that the development will not have significant environmental effects that warrant the need for EIA.

Traffic and Transport

Documentation Accompanying the Planning Application: *A Transport Statement, including Healthy Street Assessment and Draft Travel Plan will be submitted with the planning application.*

SLR Consulting Limited have prepared a Transport Scoping Note for this submission. This concludes that given the scheduling of lectures associated with the student accommodation use, that the majority of trips will be outside of peak hours. It also concludes that ~89% of all trips will be by sustainable modes of transport which exceeds the Mayor's strategic target of 80%. The site is partly a result of the site being located within an area with a current public transport accessibility level (PTAL) of 4. As such it has good public transport accessibility (Wembley Park station and numerous local bus services within 500 metres) and is in an area where the Council will seek to limit on site car parking provision.

Construction

There will be an increase in the number of vehicles accessing the site during the construction phase, however, given the scale of the development the anticipated numbers are not considered to be substantial. It is considered that any adverse effects can be mitigated through a construction logistics plan (CLP) (potentially included as part of the CEMP) to control transport movements.

With the implementation of standard mitigation measures, no significant effects are anticipated.

Operation

A Delivery, Servicing and Refuse Management Plan will be submitted with the future planning application and set out how the site would be serviced when operational, which is consistent with an approach agreed with the local highway authority. This will ensure that such trips are consolidated and reduced to reduce impacts on local highways.

Supporting information notes that due to the site's highly sustainable location, it will not negatively impact on the existing highway network. It is not clear how much vehicle parking will be provided, but the description of development proposes only disabled parking. Vehicular on-site parking provision is therefore likely to be limited. As such, operational traffic effects of the proposals are likely to be negligible when placed within the context of the site's existing use. The provision of cycle parking will also encourage the uptake of cycling further reducing the potential for trips to be undertaken by vehicles. Increased numbers of movements related to deliveries could generate additional traffic over current levels. However, given the scale of the development, these effects are not considered to be significant.

The lack of on-site car parking will mean that suitable controls on residents' potential to own/park cars on site and in the vicinity will be expected, this is likely to include restrictions within property leases as well as financial payments towards a local parking permit scheme, which

will help to mitigate any adverse effects. Advice will be required from TfL on the impact on bus and underground network capacity.

Mitigation

A CLP should be secured that includes standard mitigation measures to control transport movements (potentially as part of the CEMP).

Controls on occupants and financial payments should be sought to offset operational effects.

As such no significant environment effects are anticipated to require EIA.

Waste

Documentation Accompanying the Planning Application: A Servicing and Refuse Management Plan should be submitted as part of the planning application. This should provide an analysis of how the development will adequately cater for the storage and collection of domestic and commercial waste during its operation will be sought. A CEMP will be sought as part of the planning process to deal with demolition and construction waste matters.

Construction

The site will generate waste, principally building materials during the demolition and construction stages. The management of construction waste is covered by the Waste Duty of Care Legislation (2016), issued under section 34 of the Environmental Protection Act 1990. The implementation of standard impact avoidance measures will reduce waste from construction activities, which can be secured through the CEMP. Supporting information states that a Waste Management Plan will be produced to ensure the appropriate disposal of waste during construction phase. No significant effects are therefore anticipated.

Operation

Separate solutions should be provided for both the commercial and residential elements of the development. The inclusion of suitable waste facilities for residents is covered under part H6 of the Building Regulations, and to ensure this, inclusion of separate facilities for general waste, recycling and organic materials is normally assessed for capacity and suitability as part of the normal planning process with reference to the 2015 Brent Council guidance. Commercial waste is covered under the same legislation as construction waste, above.

If the application is approved, the decision notice should include suitable conditions to ensure that waste facilities for residents and businesses are provided prior to occupation. No significant effects are anticipated.

Mitigation

Adherence to the CEMP which will include standard mitigation measures should be secured through a planning condition for construction phase, as well as one that seeks to ensure sufficient space and practises to ensure adequate measures for waste management are in place prior to and during occupation. A Servicing and Refuse Management Plan will ensure appropriate disposal of waste during construction phase.

Water Quality (hydro morphological changes, quantity and quality)

Documentation Accompanying the Planning Application: *This matter will be addressed in a number of areas, Flood Risk Assessment / Drainage Statement, Land Contamination Assessment and the CEMP that will be required as part of the application/ permission process.*

The site is adjacent to a watercourse, the Wealdstone Brook with potential for run-off direct from the site via non-formal pathways, or via the surface water drainage network. In addition the site has historic industrial use with potential for various compounds that could adversely affect water quality such as hydrocarbons within the ground if disturbed.

Construction

During the construction process there is the potential to affect water quality through accidental pollution events, such as fuel spills and increased sediment within surface water passing through to adjacent watercourses. The implementation of standard impact avoidance measures should be secured through the CEMP. In addition, the potential of contamination on site could result in pathways either above or below ground being created that lead to watercourses, for example through piled foundations. This will require measures to avoid such potential. With the implementation of standard impact avoidance measures to ensure that the site is adequately protected, no significant effects are anticipated. It is not considered, given the scale of the development and works proposed, that there will be any significant effects on either water quantity or hydromorphology during construction.

Operation

There is the potential the operation of the proposed development to affect the foul and surface water capacity/ quantity due to an increased demand. Whilst there may be an increase in demand, given the scale of the development, it is not considered to lead to significant effects. There is the potential for pollutants originating from motor vehicles to enter the surface water and ground water systems. Such risk can be mitigated through the inclusion of pollution control measures in surface water drainage systems, which can be secured by condition. It is not considered, given the scale of the development and the implementation of SuDS (refer to Floor Risk section above) that there will be any significant effects on either water quality or hydromorphology once operational.

Mitigation

A CEMP should be secured that includes measures to protect against and deal with accidental pollution events. The Contaminated Land Survey will identify if and where contamination is present and measures required to ensure that any construction activity does not increase risk to water quality will be secured through planning condition. The implementation and management of SuDS and associated pollution control mechanisms for surface drainage should be secured through a planning condition.

As such it is not anticipated that the environmental effects will be of such significance to warrant EIA.

Wind

Documentation Accompanying the Planning Application: *A Wind Assessment will be submitted as part of the planning application process.*

Construction

It is recognised that throughout the demolition and construction phase of the project, the cranes and the erection of the new structure may affect the local wind microclimate, however these effects are considered to be temporary and not anticipated to be significant.

Operation

The operation of the proposed development will introduce new buildings onto the site up to 18 storeys in height. Therefore there may be adverse effects on the existing wind conditions. An initial wind assessment has been undertaken by GIA Surveyors. This concluded that there are no expected wind safety risks and that comfort conditions will be suitable. Whilst it did not include adjacent committed schemes within the modelling, it is noted that these schemes will provide additional shelter to the proposed site, and will not exacerbate the proposed scheme's outcomes. This can, in any case, be assessed throughout the normal planning process taking account of the results of the Wind Impact Assessment. Mitigation measures should be incorporated into the development to reduce the impacts on those within and adjacent to the development to acceptable levels.

As such it is not anticipated that the environmental effects will be of such significance to warrant EIA.

Cumulative Effects

The 2017 EIA Regulations requires the consideration of cumulative effects through interactions being the combined effects of individual effects arising as a result of the development and also with other existing development and/or approved development.

In relation to the cumulative effects of the interactions related to the proposed development, taking account of the analysis and commentary above it is not considered that the impacts are such as to be so significant to warrant EIA.

There are number of major developments in the surrounding area that are likely to be built, as detailed in 'Large Scale Development within the Vicinity'. The proposal in association with these wider developments may have the potential for cumulative impacts. The impacts of this need to be considered when determining if the effects would be so significant as to warrant EIA.

The Council has considered a wide area consisting of the Wembley masterplan area and other development sites adjacent or within the vicinity, particularly those that might generate transport movements along Fulton Road. Three of the applications identified (15/5550 – Wembley Masterplan; 14/4931 – Land Surrounding Wembley Stadium Station; and 21/2989 & 20/2033 – Euro House) as part of the cumulative assessment were subject to Environmental Impact Assessments. The Council has considered the information contained within this assessment related to the individual impacts and also the associated cumulative impacts of the proposals. The majority of these schemes are currently under construction, and are likely to have largely completed prior to the commencement of works at this site. Adjacent identified sites, such as the remainder of BCSA6 and the wider Wembley Masterplan area, will likely be subject to additional applications in the near future.

Demolition/Construction

The Environmental Statement (ES) submitted with 21/2989 (Euro House) notes possible major adverse cumulative effects in relation to noise and vibration, due to construction noise. It is noted that since the ES was produced in July 2021, that whilst a number of new applications have been granted, many of the cumulative schemes considered, are soon to, or have completed since the baseline assessment for Euro House Environmental Statement was undertaken. The situation is therefore likely to have remained similar, or have improved

in terms of cumulative noise and vibration impacts. Such impacts in any case can be mitigated through appropriate management such as through the CEMP, and would be temporary..

The Environmental Statements submitted with 15/5550 and 14/4931 both notes some potential adverse cumulative effects during construction (townscape, heritage and visual assessment, dust and dirt (in relation to transport and accessibility) and air quality), but these can be mitigated through site management, ensuring plans are coordinated, adequate pollution prevention measures. It is also noted that the development proposed under 14/4931 is in any case now completed and is located further away from this subject site than the other schemes.

It is therefore considered that no likely significant adverse cumulative construction effects will occur assuming the implementation of standard mitigation measures such as appropriate traffic management measures and construction routing; and maintenance of site hoardings and compliance with the mitigation measures detailed within the CEMP.

It is also assumed that the enabling works, demolition and construction phases associated with the other development schemes would adhere to legislative requirements, industry guidance and best practice as will be the case within the application sites. However, there remains the potential for cumulative effects to arise, particularly with respect to dust and noise.

The construction workers at the construction site of each individual cumulative scheme will have to adopt controls to prevent the significant transfer of airborne pollutants beyond their site boundaries and the use of monitoring to confirm the effectiveness of these measures. Therefore, cumulative effects at existing and future receptor locations would be appropriately managed by the contractors to avoid the occurrence of significant adverse cumulative effects. Cumulative effects during the enabling works, demolition and construction phase are therefore generally considered to be temporary, local and overall not significant.

Operation

The Environmental Statement submitted with 21/2130 (Euro House) notes a potential moderate adverse impact in relation to overshadowing on the Wealdstone Brook, and a potential adverse impact in relation to climate change (greenhouse gas emissions as a result of 'in use' emissions associated with operational energy consumption and transport related emissions). However, the statement explains that all greenhouse gases are considered to be insignificant and with the incorporation of mitigation, it is anticipated that emissions will be minimised over time. In relation to potential cumulative effects, moderate to major adverse impacts are possible in relation to loss of daylight to Kelaty House, major adverse impacts in relation to plot NE04 of the Wembley Masterplan in terms of loss of daylight, and potential moderate adverse impacts in terms of overshadowing on the Wealdstone Brook.

The Environmental Statement for Euro House states that although this section of the Wealdstone Brook would receive increased shading as a result of the development, it would still receive sunshine at different times of the day and through the year. In addition, the brook is proposed to benefit from ecological enhancements and a new habitat suitable for the resultant daylight conditions.

In relation to plot NE04 and Kelaty House, these are located to the south east of Watkin Road, and as such it is not anticipated that the subject proposal would adversely impact these developments.

In terms of potential negative cumulative impacts in relation to the Environmental Statement for 15/5550, the statement notes that there will be an increase in water demand and capacity for foul drainage and that dialogue with Affinity Water and Thames Water will ensure no significant cumulative impacts. Without mitigation, the scheme would result in significant adverse effects on the capacity of existing infrastructure, but these would be mitigated through on-site provision and physical provision funded by CIL contributions. In terms of air quality, operational effects of the development proposed by 15/5550 were found to be insignificant. Meanwhile, the Environmental Statement associated with 14/4931 notes a potential minor adverse impact when assessing cumulative impact in relation to public transport networks. It is noted that the majority of schemes considered in the cumulative development schedule for this environmental statement have completed.

With regards to the matters considered in this opinion it is not considered that there will be significant adverse cumulative operational effects when the cumulative developments and the proposed development are operational.

It is anticipated that CIL and S106 and other funding streams from Government and service providers will address capacity issues that might exist in relation to on and off-site infrastructure.