

Nicola Blake
Planning Department
London Borough of Brent
Brent Civic Centre
Engineers Way
Wembley Park
HA9 0FJ

Dear Nicola

RE: Town and Country Planning (Environmental Impact Assessment) Regulations 2017, Regulation 6 – Request for EIA Screening Opinion for the redevelopment of Wembley Park, London

We write on behalf of our client Whitbread Group PLC (hereafter referred to as the 'Applicant') to request an Environmental Impact Assessment (EIA) screening opinion pursuant to Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations, 20171 (hereafter referred to as the 'EIA Regulations') in relation to the proposed redevelopment of Wembley Park, London (hereafter referred to as the 'Site').

The Applicant intends to submit a detailed planning application for a commercial development comprising two buildings – one 29-storeys for Purpose-Built Student Accommodation (PBSA) with approximately 22,156 sqm GIA floorspace and the other for a 14-storey hotel with approximately 8,460 sqm GIA floorspace (an uplift of 1,814 GIA hotel floorspace). Whilst the design of the Proposed Development is not yet fixed for the purposes of the full planning application, the information provided to Waterman by the Applicant and their consultant team, and contained herein, is considered to be adequate to establish the likely environmental effects of the Proposed Development and to advise if it would constitute EIA development.

In the view of the Applicant and their technical consultant team, the Proposed Development is considered unlikely to result in significant environmental effects and should not therefore be subject to EIA. This request for a Screening Opinion should be read in conjunction with the following enclosures:

- Enclosure 1: Figures.
 - Figure 1: Site Location Plan;
 - Figure 2: Anticipated Site Boundary;
 - Figure 3: Map of Cumulative Schemes.
- Enclosure 2: Consideration of Schedule 3 EIA Screening Criteria.
- Enclosure 3: Preliminary Ecological Appraisal (PEA)

The Site

The Site is located at National Grid Reference TQ 193862 and wholly falls within the administrative area of the London Borough of Brent. The location of the Site is illustrated in **Figure 1** and the Site boundary is illustrated in **Figure 2**. The Site covers an area of approximately 0.4 hectares (ha).

The Site borders Brook Avenue adjacent to the railway line serving Wembley Park further to the north, Wembley Park Drive to the east, Wealdstone Brook (a Site of Importance for Nature Conservation – SINC) to the south, and residential properties to the west along Brook Avenue.

¹ HMSO (2017); Town and Country Planning (Environmental Impact Assessment) Regulations 2017 as amended.

The Site currently comprises a hotel building (Premier Inn) with 6,646 sqm GIA floorspace which is approximately 9 storeys in height with associated car parking and a number of trees (some subject to Tree Preservation Orders) present within and around the perimeter. The band of trees within the southern part of the Site also form part of the Wealdstone Brook SINC. As such, there are several ecological and residential sensitive receptors near to the Site.

The Site currently has a Public Transport Accessibility Level (PTAL) 5, representing a 'Very Good' level of access to public transport services. The Site's closest London Underground (LU) station is Wembley Park, which is situated approximately 30m northeast and is served by the Jubilee and Metropolitan line services. The Site is also close to key bus routes along the A4089 and A4088.

A desk-based review of the Site and the potential environmental constraints has been undertaken, a summary of which is provided below:

- The Site is located in an Air Quality Management Area (AQMA) as well as in one of Brent's Air Quality Focus Areas;
- There are no statutory designated ecological sites either at or in proximity to the Site;
- There are no listed buildings on the Site or in its vicinity;
- The Site falls within the visual corridor of Stadium Protected View 1, from Barn Hill;
- Part of the Site is within the Wembley Park town centre (Premier Inn), which is located within the Wembley Opportunity Area and the wider Wembley Growth Area; and
- The Site is partly located within a fluvial Flood Zone 3.

The Proposed Development

The Proposed Development has the following description:

"Demolition of existing building and car park and redevelopment of the site to provide two buildings, delivering a hotel (C1) building up to 14 storeys, and a purpose built student accommodation (Sui Generis) building up to 29 storeys with associated communal amenity space, a flexible commercial space (Use Class E) and the delivery of wider public realm improvements comprising hard and soft landscaping and other associated works."

The Proposed Development in the context of the EIA Regulations

The determination as to whether EIA is required is dependent on a consideration of whether the Proposed Development is:

- Schedule 1 development – in which case EIA is necessary (examples of Schedule 1 development include power stations, chemical installations and construction of railways); or
- Schedule 2 development – in which case EIA is necessary only if the development is likely to have significant environmental effects as referenced in Schedule 3 of the EIA Regulations.

The Proposed Development does not fall within Schedule 1 of the EIA Regulations, and although it is not specifically listed in Schedule 2 of the EIA Regulations, it could be considered under Category 10b 'Urban Development Projects' for which the following thresholds apply:

- (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.

With reference to the EIA Regulations, the Site is also not located within a 'sensitive area', defined as:

- Sites of Special Scientific Interest (SSSI);
- National Parks;
- The Broads;

-
- World Heritage Sites (WHSs);
 - Scheduled Monuments (SMs);
 - Areas of Outstanding Natural Beauty (AONBs); and
 - A European Site.

The Proposed Development does not meet the above thresholds and criteria and therefore EIA is unlikely to be required for redevelopment of the land, however the new development is on a significantly greater scale than the previous use and therefore could have the potential to generate significant environmental effects. The screening request will therefore need to present a case that the environmental effects (with mitigation taken into account) are unlikely to be significant and that the planning application can be determined by the council without recourse to EIA.

The key environmental aspects to consider will be ecology, wind microclimate, flood risk, daylight, sunlight and overshadowing, and townscape and visual.

Potential for likely significant environmental effects

In line with Regulation 6(4a) of the EIA Regulations, it is prudent to consider the criteria set out in Schedule 3 ('Selection criteria for screening Schedule 2 development') of the EIA Regulations when determining whether a Schedule 2 development is 'EIA development'.

In the view of the Applicant and their technical consultant team, the Proposed Development is considered unlikely to result in significant environmental effects and should not therefore be subject to EIA.

Documents proposed for submission alongside the planning application

Whilst it is considered that the planning application is not required to be accompanied by an Environmental Statement (ES), the Applicant is proposing to submit a suite of environmental reports as follows to satisfy planning requirements and allow the local authority to take a robust decision on the acceptability of the proposals:

- Archaeological Impact Statement;
- Air Quality Assessment including Air Quality Positive Assessment;
- Biodiversity Assessment including Biodiversity Net Gain (BNG) and Urban Greening Factor masterplan and calculations;
- Circular Economy Statement;
- Construction Logistics Plan;
- Contaminated Land Survey;
- Daylight, Sunlight and Overshadowing Assessment (External);
- Delivery, Servicing and Refuse Management Plan;
- Design and Access Statement including photographs, tall buildings assessment, landscaping detail, play space strategy, and lighting assessment;
- Energy Strategy;
- Flood Risk and Drainage Strategy;
- Foul Sewage and Utilities Assessment;
- Health Impact Assessment;
- Noise and Vibration Impact Assessment;
- Overheating Assessment;
- Socio-Economic Report;

-
- Sustainability Statement including BREEAM pre-assessment;
 - Transport Assessment including Travel Plans, Parking Design and Management Plan, and Healthy Streets Assessment;
 - Townscape and Visual Impact Assessment;
 - Tree Survey / Arboricultural Impact Assessment / Arboricultural Method Statement;
 - Ventilation/Extraction Statement;
 - Wind and Microclimate Assessment (CFD Modelling); and
 - Whole Life Carbon Assessment.

Next steps

In accordance with Regulation 6(5) of the EIA Regulations, should you consider that you have not been provided with sufficient information to adopt a screening opinion please do not hesitate to contact us as soon as may be practicable as we are conscious that, in accordance with Regulation 6(6)(a) of the EIA Regulations, an authority should adopt a screening opinion within 3 weeks beginning with the date of receipt of the request for a screening opinion.

We would, therefore, be grateful if you could confirm:

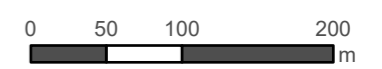
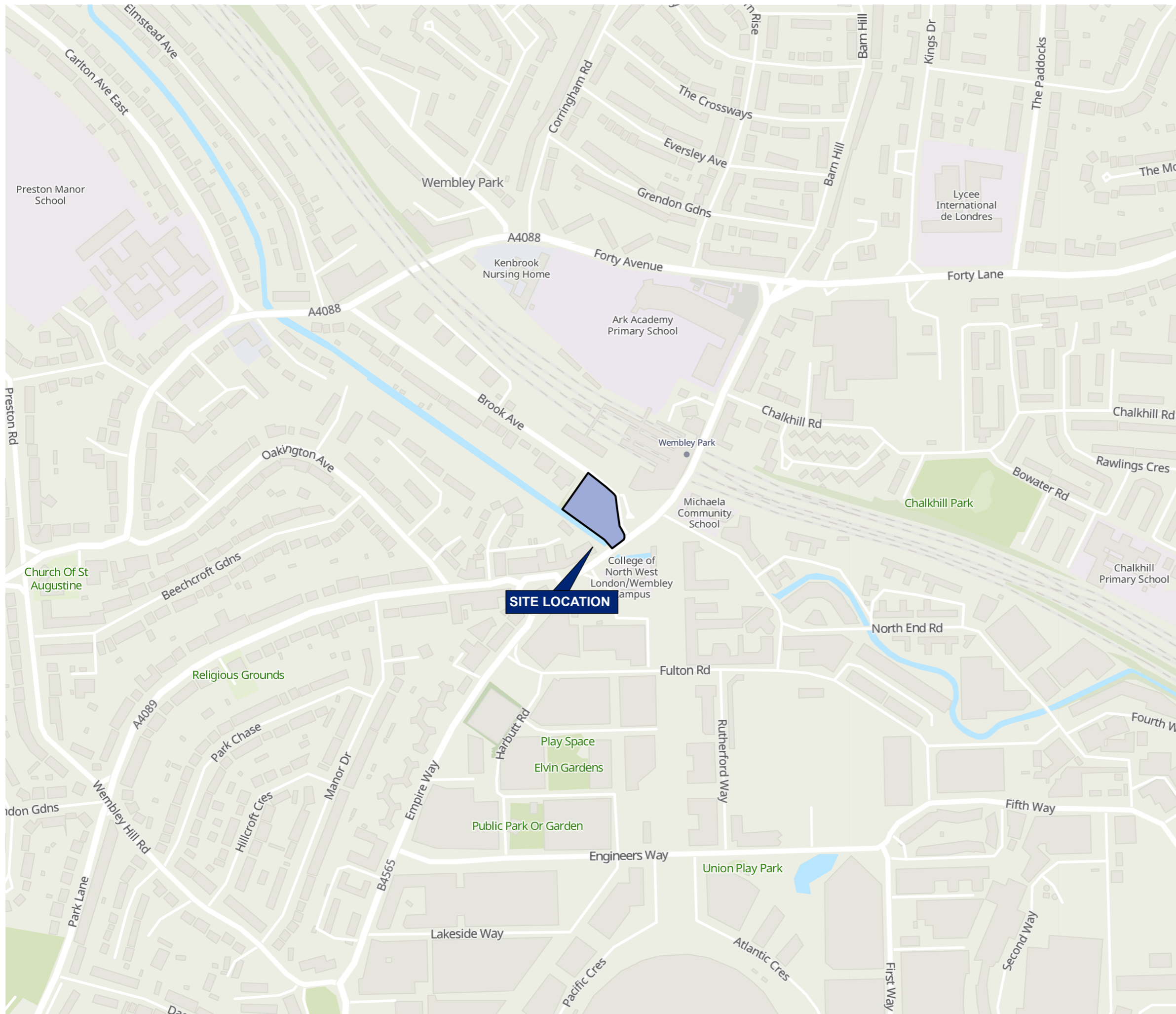
1. Receipt of this request;
2. That you have sufficient information in order to adopt a screening opinion; and
3. That you can adopt a screening opinion on behalf of LBB under delegated powers.

Yours sincerely



Ellen Smith
Associate Director – London Environmental
For and On Behalf of Waterman Infrastructure & Environment Ltd

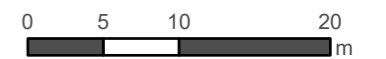
Enclosure 1: Figures



Project Details	WIE21431-100: Wembley Park
Figure Title	Figure 1: Site Location Plan
Figure Ref	21431100-WAT-XX-XX-GS-N-760001
Date	May 2025
File Location	WIE21431-100\GIS\21431100-WAT-XX-XX-GS-N-76

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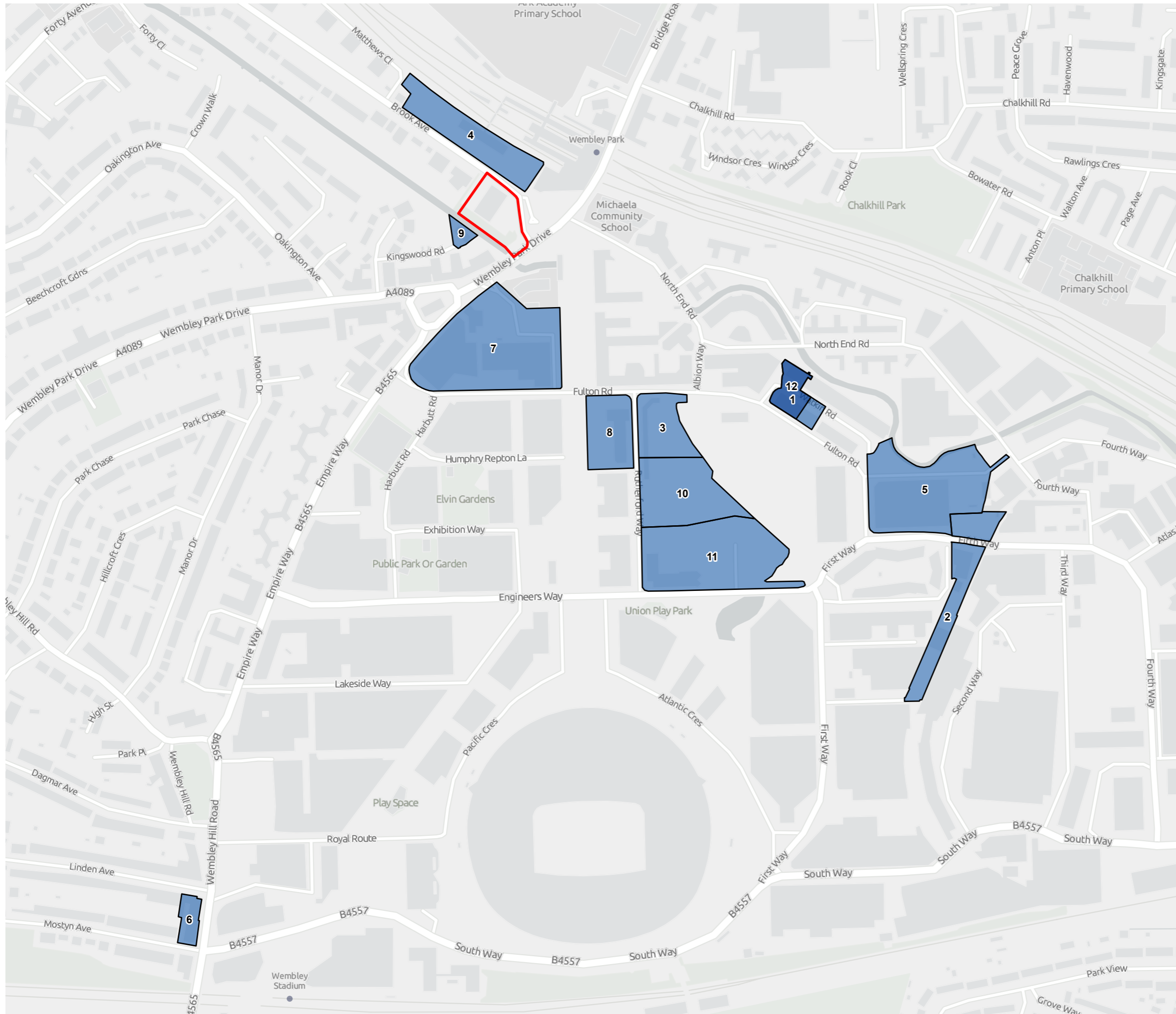
 Site Boundary



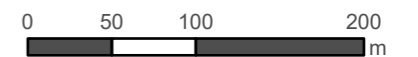
Project Details	WIE21431-100: Wembley Park
Figure Title	Figure 2: Anticipated Site Boundary
Figure Ref	21431100-WAT-XX-XX-GS-N-760002
Date	May 2025
File Location	WIE21431-1009_GIS\21431100-WAT-XX-XX-GS-N-76

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- Site Boundary
 - Cumulative Schemes
1. 1-4 & 9 Wembley Prestige Cars, Watkin Road
 2. Glynn's Skip Hire, Fifth Way
 3. Yellow Car Park (Plote NE01), Engineers Way
 4. Wembley Park Station Car Park and Train Crew Centre, Brook Avenue
 5. Euro House, Fulton Road
 6. 33A, 33-35 and St George Hotel, 43-51 Wembley Hill Road
 7. All units, Stadium Retail Park, Wembley Park Drive & 128 Wembley Park Drive (fountain studios)
 8. Olympic Office Centre, 8 Fulton Road
 9. 5 Kingswood Road, Wembley
 10. Land to the east of Rutherford Way (Plot NE02 and Phase 1B of the Northern Park), Wembley
 11. Land to the east of Rutherford Way and the north of Engineers Way (Plot NE03 and Phase 1A of the Northern Park), Wembley
 12. 1,2,3 & 9 Watkin Road, Wembley



Project Details	WIE21431-100: Wembley Park
Figure Title	Figure 3: Map of Cumulative Schemes
Figure Ref	21431100-WAT-XX-XX-GS-N-760003
Date	June 2025
File Location	WIE21431-100\9_GIS\21431100-WAT-XX-XX-GS-N-76

Enclosure 2: Consideration of Schedule 3 EIA Screening Criteria

1. Characteristics of the Proposed Development

With reference to the selection criteria listed in Schedule 3 of the EIA Regulations, the characteristics of the Proposed Development are set out below.

a. Size and design of the Proposed Development

The Proposed Development would cover an area of approximately 0.4 ha.

The proposals comprise the construction of two buildings – one 29 -storeys for Purpose-Built Student Accommodation (PBSA) with approximately 22,156 sqm GIA floorspace and the other for a 14 -storey hotel. This will result in an uplift in 23,970 sqm GIA floorspace. The following uses will also be provided:

- PBSA plant/cycle store: 718 sqm
- Hotel plant/cycle store: 235 sqm
- 809 sqm of student amenity located at ground, first and second floors
- Restaurant use at the ground floor of the hotel.

b. Cumulation with other development / or approved development

Table 1 lists other developments which are approved or awaiting approval within 1km of the Site that in themselves meet the relevant screening thresholds and criteria for category 10b urban development projects. This is based on 2015 guidance from the Department for Communities and Local Government (DCLG)² which states that:

“taking into account all issues raised in the consultation we are confident that developments which will fall below the proposed thresholds will not be likely to have significant effects either alone or in combination with other projects because of their nature, location or impact.”

² DCLG (2015) Government response to the technical consultation on environmental impact assessment thresholds, HMSO.

Table 1: Cumulative Schemes

Scheme No.	Cumulative Scheme	Application Reference	Status	Proximity	Description of Development
1	1-4 & 9 Wembley Prestige Cars, Watkin Road	22/3965	Approved February 2024	435m	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. Subject to a legal agreement under Section 106 of the Town and Country Planning Act 1990 (as amended) dated 23rd of February 2024.
2	Glynns Skip Hire, Fifth Way	23/1426	Awaiting decision	779m	Demolition of existing buildings and structures and erection of up to seven buildings ranging in height from 5 to 15 storeys to provide purpose built student accommodation (Use Class Sui Generis), light industrial (Use Class E(g)(iii) and cafe (Use Class E(a)) floorspace, car and cycle parking, amenity space (internal & external), new public realm, landscaping, alterations to vehicular access, highway works and other associated works. (REVISED plans and supporting technical information received)
3	Yellow Car Park (Plot NE01), Engineers Way	22/3208	Approved December 2022	446m	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 estates 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. Yellow Car Park (Plot NE01), Engineers Way, Wembley.

Scheme No.	Cumulative Scheme	Application Reference	Status	Proximity	Description of Development
4	Wembley Park Station Car Park and Train Crew Centre, Brook Avenue, Wembley, HA9	20/0967	Approved February 2022	Adjacent	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.
5	Euro House, Fulton Road, Wembley, HA9 0TF	21/2989	Approved March 2022	544m	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),
6	33A, 33-35 and St George Hotel, 43-51 Wembley Hill Road, Wembley, HA9	20/1310	Approved September 2022	924m	Demolition of former AIB building and erection of a part 5, part 6 storey building with a 2 storey basement level for use as hotel and retail unit and additional storey extension to St. George's Hotel.
7	All Units, Stadium Retail Park, Wembley Park Drive & 128 Wembley Park Drive (fountain studios), HA9	17/3059	Approved February 2021	192m	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, with the maximum quantum as follows: A1-A4 Retail and/or B1 Office and/or D1 (Non-Residential Institutions) and/or D2 Leisure and Assembly: up to 6,600 sqm; and C3 Residential: up to 78,400 sqm gross (approximately 995 units); No occupied residential accommodation will be at ground level or below. The development will also provide associated open space and landscaping; car parking spaces and cycle storage; pedestrian, cycle and vehicle access; associated highway works; and associated infrastructure including water attenuation tanks, and the diversion of any utilities and services to accommodate the development. Internal plant, refuse, cycle stores, residential lobbies, circulation and other ancillary space will comprise a maximum of 10,000 sqm gross external in addition to the 85,000 sqm total set out above.

Scheme No.	Cumulative Scheme	Application Reference	Status	Proximity	Description of Development
8	Olympic Office Centre, 8 Fulton Road, Wembley, HA9 0NU	17/5097	Approved April 2021	239m	Redevelopment of the Olympic Office Site and erection of a replacement building comprising residential units, flexible retail uses, car parking at basement level, associated landscaping, plant room and amenity space.
9	5 Kingswood Road, Wembley, HA9 8JR	20/2287	Approved June 2021	64m	Demolition of warehouse building and erection of a four storey building comprising flats with roof top amenity space and ground floor commercial unit, provision for bicycle and refuse storage and associated landscaping
10	Land to the east of Rutherford Way (Plot NE02 and Phase 1B of the Northern Park), Wembley	21/2517	Approved October 2021	455m	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
11	Land to the east of Rutherford Way and the north of Engineers Way (Plot NE03 and Phase 1A of the Northern Park), Wembley	21/2424	Approved October 2021	455m	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.

Scheme No.	Cumulative Scheme	Application Reference	Status	Proximity	Description of Development
12	1,2,3 & 9 Watkin Road, Wembley, HA9 0NL	20/0587	Approved February 2020	440m	Demolition of existing buildings and erection of a new mixed use building containing residential units and commercial floor space and a new building containing residential units; associated car and cycle parking, refuse storage, amenity space and associated landscaping

It is assumed that all of the identified schemes will be constructed in adherence to a Construction Environmental Management Plan (CEMP) as a condition to planning and designed to avoid and minimise environmental effects (e.g., noise and dust) as far as is practicable. As such, in relation to cumulative construction effects, if the Proposed Development were to proceed at the same time as one or more (or all) of these other schemes, as a result of measures secured in relation to each, it is considered unlikely that significant environmental effects will arise.

With regard to cumulative operational effects, traffic associated with each of the developments during operation is accounted for through the application of growth factors on existing traffic flows. This means that cumulative increases in transport, and by extension increases in air pollutants and road traffic noise, are taken into account. For other topics (ecology, socio-economics, ground conditions, waste, water resources, greenhouse gas and climate change) the Proposed Development is unlikely to give rise to significant effects once operational as set out later within this screening request for an EIA Screening Opinion, it is also unlikely that significant environmental effects would arise in combination.

For wind microclimate; daylight, sunlight and overshadowing; and townscape and visual impact, the above schemes (as appropriate) are being considered and are informing the design of the Proposed Development through iterative testing, and where necessary mitigation would be included within the final design.

The appropriate cumulative schemes will be considered within the relevant standalone environmental assessment reports supporting the planning application. Given the iterative design development, it is considered that there would be no likely significant cumulative environmental effects.

c. The use of natural resources, in particular land, soil, water and biodiversity

The Proposed Development would utilise sustainable design measures to minimise the use of natural resources during construction and operation. The suite of environmental planning documents will include a Circular Economy Statement, an Energy Strategy, a Sustainability Statement (including BREEAM pre-assessment), and a Whole Life Carbon Assessment and, in line with best practice and policy requirements, the Proposed Development shall seek to minimise energy and water use by design.

d. The production of waste

Best construction practices would be employed to minimise the construction waste arisings, according to current waste legislation and guidance, and would be achieved through the implementation of the CEMP (expected to be secured by planning condition). Sufficient storage facilities would be designed into the Proposed Development, in line with the London Borough of Brent's requirements and the waste hierarchy³. Refer to Section 3 of this Enclosure for further consideration of waste effects. Details of operational waste and construction waste will be submitted as part of the planning application.

e. Pollution and nuisances

Possible noise and air pollution / nuisances arising from building plant and light pollution during the construction and operational phase would be subject to regulatory controls, to ensure that any adverse pollution / nuisance effects are avoided or reduced to an acceptably low level. The plant installed as part of the Proposed Development would be built to the latest energy standards and regulatory requirements and, as such, is anticipated to improve energy use and reduce carbon emissions compared with the existing plant. There is also likely to be a betterment in noise and air

³ Department for Environment, Food & Rural Affairs (2011): Guidance on applying the waste hierarchy.

quality emissions associated with the installed plant, with noise limiting values set to achieve acceptable noise levels at nearby sensitive receptors.

In order to reduce energy demand, the design team have followed a “fabric first” approach using climate-based passive design to reduce the operational energy demand. The building facades will be studied and optimised to limit unwanted solar exposure and promote access to daylight where required.

Energy efficiency design strategies will likely include:

- Fabric first approach – prioritise passive design measures;
- 100% electric, no fossil fuels to be used on site;
- Investigate the possibility of natural ventilation – mixed mode;
- Use of high-performance air source heat pumps;
- Incorporate smart technology for building controls;
- Provision of renewables and consideration towards battery storage, if applicable; and
- Carbon savings in line with GLA targets.

Whole Life Carbon design strategies will likely include:

- Opportunities to maximise/re-use:
 - Recover and reuse materials where possible; and
 - Maximise use of low carbon and high recycled content materials.
- Embodied carbon – GLA target for A1-A5 emissions
 - Achieve maximum GLA target of <950kgCO₂/m²
 - Aspire to <600kgCO₂/m²
- Investigate pre-fabricated elements;
- Design for durability, aiming to achieve relevant standards and protect vulnerable areas; and
- Design for disassembly through use of mechanical fixings where possible, as well as developing an End-of-Life Plan.

Green initiatives to be considered within the design:

- Achieve BREEAM Excellent as a minimum;
- Excellent water efficiency;
- Stormwater management aiming to achieve greenfield run-off rates;
- Provision of green spaces and new planting;
- Green construction, by prioritising low emission plant machinery and Considerate Contractors Scheme; and
- Construction waste recycling and diversion from landfill in line with GLA targets.

f. [The risk of major accidents and / or disasters relevant to the development concerned, including those caused by climate change](#)

The Site is not located in the vicinity of any Control of Major Accident Hazard (COMAH) sites.

During the construction works, the implementation of the aforementioned CEMP by the appointed contractor would ensure that any hazardous materials on Site, including asbestos if present, would be removed in an appropriate manner and by licenced contractors.

The southern Site boundary is located within a Zone 3 floodplain, which means this part of the Site has a high risk of fluvial flooding (3.3% or greater annual exceedance probability).

The proposals comprise non-industrial development, so the risk of accidents and disasters in relation to the end use of the Site is inherently low.

g. The risks to human health

The Proposed Development would not lead to significant risks to human health. As further explained in Section 3, no significant air quality or noise issues are anticipated as a result of the Proposed Development. Contamination is considered likely to be present beneath the Site which will require some localised remediation. If necessary, an appropriate remediation strategy will be prepared and agreed with the Environment Agency and LBB. The CEMP will also outline procedures for the prevention of pollution, materials storage and use of materials, including the use of Personal Protective Equipment (PPE) by construction workers.

2. Location of Development

With reference to the criteria in Schedule 3 of the EIA Regulations, the sensitivity of the geographical area likely to be affected by the Proposed Development must be considered. This is discussed below:

a. The existing and approved land uses are as follows:

The Site is currently occupied by a hotel building (Premier Inn) with associated car parking and a number of trees (some subject to Tree Preservation Orders) present within and around the perimeter.

The Site is located in the London Borough of Brent, a highly urbanised area of northwest London which is predominantly in mixed residential and commercial use. Key public transport infrastructure including Wembley Park underground station is located approximately 30m northeast of the Site and several bus stops are located within 200m of the Site.

A number of residential, commercial and retail buildings are located in the wider surroundings, including:

- Residential properties in the surrounding area including along Brook Avenue, Kingswood Road, Elmside Road. Wealdstone Court, a 9-storey residential block along Brook Avenue is approximately 20m to the west of the Site;
- Wembley Park Underground Station, approximately 30m to the northeast of the Site; and
- 147 Wembley Park Drive, containing a betting shop on the ground floor and a residential flat above, approximately 15m to the south of the Site.
- Michaela Community School, located approximately 100m east;
- Ark Academy, located approximately 120m northeast;
- Wembley Park Synagogue, located approximately 250m southwest; and
- Chalkhill Community Centre mosque, located approximately 290m northeast.

b. The quantity and regenerative capacity of natural resources in the area should not be impacted.

The Site is currently occupied by a hotel building (Premier Inn) with associated car parking. The construction works would follow a CEMP to be implemented by the principal contractor the scope of which would be agreed with the London Borough of Brent and secured by a planning condition.

In relation to the existing natural resources, it should be noted that:

- (i) The Site is not located within a 'sensitive area', as defined by the EIA Regulations (Regulation 2);
- (ii) The Site is not located in nor bound by a nature reserve nor in a nationally designated area such as a Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC); Special Protection Area (SPA), National Park, Area of Outstanding Natural Beauty (AONB), National Nature Reserve (NNR) or Ramsar Site; and
- (iii) The band of trees within the southern part of the Site also form part of the Wealdstone Brook SINC.

c. The absorption capacity of the natural and historical environment would not be subject to detrimental effects, owing the nature and scale of the Proposed Development

- (i) The Site is not located within the vicinity of any of the following areas identified in Schedule 3 of the EIA Regulations: wetlands, riparian areas, river mouths, coastal zones, marine environments, mountains or forests;
- (ii) As set out in item 2b(ii) above, there are no statutory designated sites within 1km of the Site;
- (iii) There are no European sites within the vicinity of the Site;
- (iv) The whole of the London Borough of Brent has been designated an Air Quality Management Area (AQMA) owing to exceedances of national objective levels of nitrogen dioxide (NO₂) and fine particulates (PM₁₀), though emissions to air from the Proposed Development traffic are expected to be negligible compared to those associated with overall traffic flows in the area (see **Section 3**);
- (v) The Site is not located within a World Heritage Site and there are no scheduled monuments or listed buildings on Site. The closest World Heritage Site, the Palace of Westminster, is located approximately 12.6km to the southeast of the Site; and
- (vi) The Site does lie within Protected Views as defined in the London View Management Framework⁴.

3. Type and Characteristics of Potential Effects

The range of potential environmental effects associated with the Proposed Development is considered as follows:

Human Health

The Proposed Development includes a building comprising approximately 21,025 sqm GIA floorspace of PBSA (605 beds), which will result in an increase in residential population in the local area. The Proposed Development will also result in a temporary increase in workers in the local area through the employment of construction workers. Risks to human health are considered in **Section 1 (g)** and below.

Effects during Construction

The following potential effects may result from construction works which form part of the Proposed Development):

- The generation of employment during the works, including opportunities for local employment.
- The generation of additional expenditure resulting from the workforce associated with the works.

Whilst the works would provide some employment, the jobs would be temporary and would be short-term employment opportunities, as would be expected for a project of this type; the jobs, whilst beneficial, would not significantly impact on the local economy.

Effects once Proposed Development is Complete and Operational

The following human health implications have been identified as being of potential relevance to the Proposed Development:

- Amenity issues to future occupiers of the Proposed Development, arising as an indirect result of typical activities for example noise and emissions to air from heating plant; and
- Amenity and safety issues as a direct effect of the physical form of the Proposed Development in terms of the microclimatic effects of, in this case, daylight, sunlight, and overshadowing and wind.

⁴ Mayor of London (2012); London View Management Framework, Supplementary Planning Guidance, March 2012.

These issues will be addressed as part of the inherent mitigation measures of the Proposed Development.

Summary

Given the above, the Proposed Development is not considered likely to result in significant environmental effects in terms of human health.

Socio-economics

The Site is currently occupied by a hotel building (Premier Inn) with associated car parking and a number of trees. To enable construction of the Proposed Development, the existing buildings on Site will be demolished. Construction workers will be employed to undertake the demolition and construction works.

The demolition of the existing hotel will result in a temporary loss of employment; however the proposals include the construction of a 16-storey hotel with 8460 sqm GIA floorspace which will bring new employment opportunities to the area.

The completed Proposed Development will also provide new purpose-built student accommodation, bringing new residents to the Site. The London Plan 2021⁵ sets LBB a target of 23,250 new homes to be delivered by 2028/29, 2,325 new homes per year. The London Plan treats PBSA as a contribution towards housing targets on a ratio of 2.5:1.

The Proposed Development would make a positive contribution towards this target by delivering 605 PBSA beds equivalent to 242 homes. Therefore, the Proposed Development will contribute approximately 10.4% towards LBB's London Plan annual target and 1.0% of its target over the plan period. The increase in residents could create additional demand for community facilities including education, healthcare, open space and playspace. The new employees, residents and construction workers brought to the Site by the Proposed Development are likely to generate additional spending within the local area.

Effects during Construction

Effects during the construction and demolition phase are likely to include:

- Generation of temporary employment during the demolition and construction works;
- Spending by construction workers; and
- Temporary loss of employment.

Effects once Proposed Development is Complete and Operational

Effects once the Proposed Development is complete and operational are likely to include:

- Delivery of new homes;
- Creation of new employment opportunities at the new hotel, which includes a restaurant;
- The effect of the population accommodated by the new homes on social infrastructure, specifically primary healthcare and open space;
- Net effect on employment opportunities once the Proposed Development is complete and operational; and
- Spending by residents and employees.

Summary

The Proposed Development is not considered likely to result in significant environmental effects in terms of socio-economics. A Socio-economic assessment report will be submitted in support of the planning application.

⁵ The London Plan 2021, GLA, March 2021

Biodiversity and Ecology

An ecology site visit was undertaken on 16 April 2025, details of which are included in the Preliminary Ecological Appraisal (PEA) prepared by Waterman (**Enclosure 3**). The survey included a UK Habitat (UKHab) classification, Daytime Bat Walkover (DBW), Preliminary Roost Assessment (PRA), Ground Level Tree Assessment (GLTA), and an incidental search for Invasive Non-Native Species (INNS).

The desk study, provided by Greenspace Information for Greater London (GiGL), identified several statutory and non-statutory designated sites, off-site but within the search area (within 2km). This included national sites such as Brent Reservoir SSSI, two LNRs, and 19 SINCS. The data also highlighted the presence of legally protected species, including various bat species (pipistrelle, serotine, noctule, Leisler's, and Daubenton's) and birds (house sparrow, kingfisher, etc.).

During the site visit, the habitats on-site were found to be common at both national and local levels, predominantly urban habitats including buildings, hardstanding with scattered trees and ornamental planting, as well as a small area of other broadleaved woodland. A portion of the Wealdstone Brook is also present on-site. Japanese knotweed was noted within the ornamental planting, but no other invasive non-native species (INNS) listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) were recorded.

The Site's habitats - including the building, woodland, hedgerow, and trees are suitable for common nesting bird species, however netting is installed under a drive-through section of the building to prevent nesting. The Daytime Bat Walkover indicated low suitability for foraging and commuting bats due to the presence of the Wealdstone Brook and woodland corridor adjacent to the Site (but also considering the surrounding urban environment), however no potential roost features were identified at the building or any trees. The River Corridor Assessment (RCA) of Wealdstone Brook determined the watercourse to be in 'fairly poor' condition.

Based on the findings from the desk study and site visit, and subject to consultation with the LBB, additional bat activity surveys were recommended due to the Daytime Bat Walkover showing low suitability for foraging and commuting bats. These additional bat surveys are due to be undertaken in June 2025. No other additional surveys for notable or legally protected species are recommended at this time.

Trees are currently present on-site, including along the western Site boundary and in the southern part of the Site which also form part of the Wealdstone Brook SINCS. In addition, six trees with Tree Preservation Orders (TPOs) are located in the east of the Site. Whilst it may be possible to retain some existing trees, a number of trees will need to be removed to facilitate the Proposed Development. The Applicant aspires to retain one TPO tree. A Tree Survey / Arboricultural Impact Assessment / Arboricultural Method Statement will be submitted alongside the planning application.

Effects during Construction

It is recommended that the development works (that could cause a disturbance event such as demolition works) commence on Site outside of the breeding bird season (approximately March to June) to avoid any disturbance to the species.

In the event that bat roosts, hibernating bats or black redstarts are encountered during demolition, the Site Manager should be informed and a strategy agreed with Natural England and LBB as to the most appropriate method for managing these protected species.

All demolition staff should receive a toolbox talk on the various ecological sensitivities of the Site as part of their induction, such as the potential presence of breeding birds and roosting bats.

Additionally, no waste materials, including silt laden site drainage and spillages, hazardous materials, chemicals or fuels should be allowed to enter the surface water drainage system without consent from the Environment Agency.

Effects once Proposed Development is Complete and Operational

The following will be considered and included in the final scheme design if possible:

- Bird boxes installed in appropriate areas on the new building to benefit nesting birds.
- The landscaping scheme would include native plant species that will benefit biodiversity.
- The inclusion of biodiverse green roofs and introduced shrub and street trees.

Further recommendations are provided in the PEA (**Enclosure 3**).

Consequently, it is considered unlikely that the Proposed Development would have any significant effect upon ecology.

Summary

The Site is located within an urban setting, however, lies within 10m from an ordinary Watercourse, (Wealdstone Brook) therefore, without mitigation, there is the potential for significant adverse environmental effects on biodiversity. Standard good practice legal compliance measures are proposed during site clearance relating to breeding birds and invasive plant species. Measures will be included in the final design to achieve a net gain in biodiversity value on Site and a Biodiversity Assessment, including BNG calculations, will be submitted with planning alongside an Ecological Impact Assessment with full details on the survey and data search findings. In addition, and due to the presence of an ordinary Watercourse being within 10m of the planning application boundary, a River Condition Assessment (RCA) will also be prepared to form a baseline of the BNG assessment for Watercourse Units.

Ground Conditions and Contamination

A desk-based review has been undertaken of the Site to assist the EIA screening report, and the information is detailed below.

Published British Geological Survey (BGS) maps and borehole records indicate that no significant superficial deposits are present. The underlying bedrock across the Site comprises the London Clay Formation. The Environment Agency (EA) classifies the London Clay Formation as Unproductive Stratum, which contains insignificant quantities of vertically or laterally extensive groundwater.

Given past construction and / or demolition work on the Site in developed areas there is the potential for made ground to be present, however, this has not been verified.

The Site is not located within a groundwater Source Protection Zone (SPZ).

The closest surface water feature to the Site is the Wealdstone Brook (a SINC) which borders the Site to the south.

The Zetica Unexploded Ordnance Map indicates the Site is at a low to moderate risk of unexploded ordnance (UXO). An identified Luftwaffe target is located approximately 340m southeast of the Site and an UXO was previously found approximately 475m to the southwest of the Site.

Effects during Construction

In view of the above information, contamination is likely to be present beneath the Site which will require some localised remediation. However, such issues are common to most urban redevelopment projects, particularly in London. Furthermore, legislation requires that all redevelopments must not give rise to contamination of humans or the wider environment. As such, all contamination can be successfully managed and mitigated via various standard means including:

- The preparation of an appropriate remediation strategy to be agreed with the Environment Agency and LBB to ensure that the Site is appropriate for its end use;
- The use of construction methods that minimise contaminative risks, particularly with regard to intrusive works such as piling; and
- Implementation of best practice measures to ensure that the works are undertaken to minimise

environmental risks to all receptors. The CEMP will outline procedures for the prevention of pollution, materials storage and use of materials. It is a tried and tested means of ensuring that effects are managed and minimised. It is expected that the CEMP would be secured by standard planning conditions.

Effects once Proposed Development is Complete and Operational

As no contaminative uses are proposed once the Proposed Development is complete and operational, there are no likely significant effects.

Summary

The Proposed Development is not considered likely to result in significant environmental effects in terms of ground conditions or contamination. A Contaminated Land Survey will also be submitted alongside the planning application.

Flood Risk and Drainage

The closest surface water feature to the Site is the Wealdstone Brook which borders the Site to the south. The Wealdstone Brook flows from the northwest to the southeast where it joins the River Brent approximately 920m to the southeast of the Site. The southern Site boundary is located within a Zone 3 floodplain, which means this part of the Site has a high risk of fluvial flooding (3.3% or greater annual exceedance probability).

Effects During Construction and once Complete and Operational

Potential flood risk and drainage effects include:

- Change in flood risk on-Site and to downstream third-party land during demolition and construction works and once the Proposed Development is complete and operational; and
- Change in surface water run-off and potential risk to third party land during demolition and construction works and once the Proposed Development is complete and operational.

The implementation of best practice environmental management controls as part of the CEMP would ensure appropriate surface water drainage of the construction site, thereby ensuring no occurrence of significant localised surface water flooding.

As part of the FRA, a drainage strategy will be provided to demonstrate how both surface and foul water discharge from the Site can be managed appropriately. In line with LBB and national policy requirements and best practice, surface water runoff from the Proposed Development will be restricted to as close to the greenfield runoff rate as possible. The required attenuation volume would be provided via Sustainable Drainage Systems (SuDS) that provide biodiversity, amenity and water quality/quantity benefits. It is therefore unlikely that there would be resulting capacity issues with the surrounding surface water public sewers.

The Proposed Development would lead to an increase in foul water discharge from the Site. A pre-development enquiry will be submitted to Thames Water to confirm whether they have adequate capacity to accommodate the foul and surface water flows from the Site. There may be a requirement to undertake reinforcement works to the public sewers/treatment works to accommodate the Proposed Development. The additional foul water discharge associated with the Proposed Development is not considered to be significant assuming reinforcement works are undertaken, if required. The need for any reinforcement works associated with foul water discharge will be set out within the drainage strategy following submission of the pre-development enquiry to Thames Water. Any works that may be required would be secured by planning conditions to ensure that appropriate reinforcement works are undertaken, if necessary. A Foul Sewage and Utilities Assessment will also be submitted with the planning application.

It is anticipated that foul and surface water drainage from the Site would connect into the local Thames Water sewer systems. Where possible, the existing connections would be maintained. This would be confirmed at the detailed design stage.

Summary

The Proposed Development is not considered likely to result in significant environmental effects in terms of flood risk and drainage.

Transportation and Access

Pedestrian and Cycle Access

The Site benefits from being situated within easy walking distance of numerous public transport modes and amenities. The main roads surrounding the Site, including Wembley Park Drive, have good quality footways with effective widths. Pedestrians are well provided for in the locality with numerous local amenities and public transport facilities being within a reasonable walking distance. Crossing opportunities are provided nearby with both signalised and informal crossings on Wembley Park Drive as well as the pedestrianised Olympic Way between Wembley Park underground station and Wembley Stadium to the southeast of the Site.

Current access to the Site is from Brook Avenue from the northeast of the Site for pedestrians. Vehicles access the Site from the northwest from Brook Avenue where a car park is currently located within the Site.

Public Transport

The Site benefits from strong public transport connectivity and currently has a Public Transport Accessibility Level (PTAL) 5, representing a 'Very Good' level of access to public transport services.

Located within close proximity to key transport hubs such as Wembley Park Station (approximately a 5-minute walk), Wembley Stadium Station, and Wembley Central Station (each within a 15-minute walk), the area is served by multiple Underground and National Rail lines offering frequent services throughout the day. Wembley Park Underground Station is situated approximately 30m northeast and is served by the Jubilee and Metropolitan line services.

The Site is also in close proximity to key bus routes along the A4089 and A4088. The nearest bus stops are located on the A4089, one approximately 80m southwest and another at Wembley Park Station, approximately 145m northeast. Services along the A4089 include the 83, 182, 206, 223, and 297. Empire Way (Stop J) provides access to northbound services and Empire Way (Stop A) provides access to eastbound and southbound services.

Road Network

Vehicular and pedestrian access to the Site is from Brook Avenue, which also provides access to the Site's car parking/servicing area.

The Proposed Development does not include any car parking (other than 1 blue badge space for the hotel, and 1 blue badge space for the PBSA), which is a reduction compared to the existing site. The only vehicle trips resulting from the completed and operational Development will be those associated with servicing and taxi movements.

Effects During Construction

During the construction and demolition works which form part of the Proposed Development there is likely to be a short term, temporary increase in local traffic, including heavy goods vehicles, as a result of the transportation of building materials, workers and other deliveries, which is likely to result in some temporary, localised disruption to road users.

Transport movements during the works (both construction and limited demolition) will be effectively managed through the implementation of a Construction Logistics Plan (CLP), which will be submitted alongside the planning application, as part of the Transport Assessment. The full CLP will be discussed and agreed with LBB in advance of the construction works (and limited demolition) commencing on Site and will include, but not be limited to, the following mitigation measures:

- Neighbourhood consultation to effectively manage construction impacts and understand local challenges;
- Adherence to dedicated construction vehicle routes to ensure vehicles remain on major roads where possible;
- Scheduling of deliveries to ensure simultaneous deliveries do not occur and activity is programmed out of peak network hours;
- Adherence to safety and environmental standards and programmes;
- Collaboration with other construction sites in the area to minimise disruption to the local network; and
- Implementation of a Staff Travel Plan to ensure all employees during demolition and construction are aware of the active and sustainable travel options available locally to enable staff to make informed travel choices.

Effects once Development is Complete and Operational

Significant effects arising from traffic generated from the completed and operational Development are considered unlikely. Owing to the highly accessible nature of the Site and car-free approach for the Proposed Development (other than 2 blue badge spaces), it is expected that the vast majority of development trips will be undertaken by sustainable and active modes of travel, with any vehicle trips to be attributed to servicing vehicles and taxi pick-up/drop-off activity.

Given the high capacity and frequency of the nearby public transport services, the additional demand generated by the Site is expected to be well absorbed and is unlikely to have a material impact on the surrounding transport infrastructure. Therefore, it is not considered the increase in floorspace at the Proposed Development will have a significant effect on the operation of the local network(s). It is considered that the potential effects regarding transport associated with the completed and operational Development are not likely to be significant.

Summary

The Proposed Development is not considered likely to result in significant environmental effects in terms of transportation. As part of the planning application a Transport Assessment, including Travel Plans, Parking Design and Management Plan, and Healthy Streets Assessment, will be submitted. In addition, a Construction Logistics Plan and a Delivery, Servicing and Refuse Management Plan will also be submitted.

Air Quality

LBB has declared the whole administrative area an Air Quality Management Area (AQMA) in relation to exceedances of the 24-hour and annual mean nitrogen dioxide (NO₂) and particulate matter (PM₁₀) Air Quality Strategy (AQS) objectives.

The Greater London Authority has also identified 187 Air Quality Focus Areas (AQFA) in London, these are locations that exceed the EU annual mean limit value for NO₂ and have high levels of human exposure. The Site is located within one of LBB's AQFAs.

A review of local air quality was undertaken using the LBB Annual Status Report (ASR) for 2023⁶.

⁶ Brent Council. (2024). *London Borough of Brent Air Quality Annual Status Report for 2023*. Available at: <https://www.brent.gov.uk/-/media/files/resident-documents/environment-documents/london-borough-of-brent-air-quality-annual-status-report-2023.pdf?rev=77a43dffa72b46a4811c6b1fb5be0f6a&hash=D5323CF79D15A76F089741836BEA32A6>

In 2023, a full year of NO₂, PM₁₀ and PM_{2.5} monitoring was undertaken within LBB at four automatic monitors. The automatic monitors are:

- IKEA (BT4): A roadside monitor located approximately 2.0km southeast of the Site (monitoring NO₂, PM₁₀ and PM_{2.5});
- Neasden Lane (BT5): An industrial monitor located approximately 2.5km southeast of the Site (monitoring NO₂, PM₁₀ and PM_{2.5});
- John Keble Primary School (BT6): A roadside monitor located approximately 3.6km southeast of the Site (monitoring NO₂, PM₁₀ and PM_{2.5}); and
- Ark Franklin Primary Academy (BT8): A roadside monitor located approximately 5.5km southeast of the Site (monitoring NO₂, PM₁₀ and PM_{2.5}).

The results for these automatic monitors are presented in **Table 2** below.

Table 2: Measured Concentrations at the LBB automatic monitors

ID	Pollutant	Averaging Period	AQS Objective	2019	2020	2021	2022	2023
BT4	NO ₂	Annual Mean	40µg/m ³	63.0	49.0	46.4	43.2	38.7
		1 Hour Mean (Number of Exceedances)	200µg/m ³ not to be exceeded more than 18 times per year	9	0	2	0	2
	PM ₁₀	Annual Mean	40µg/m ³	30.0	26.0	25.6	27.9	25.7
		24-Hour Mean (Number of Exceedances)	50µg/m ³ not to be exceeded more than 35 times per year	29	20	16	24	21
	PM _{2.5}	Annual Mean	25µg/m ³	20.7	13.0	13.5	12.8	11.2
	BT5	NO ₂	Annual Mean	40µg/m ³	38.0	29.0	30.0	28.0
1 Hour Mean (Number of Exceedances)			200µg/m ³ not to be exceeded more than 18 times per year	2	0	0	0	0
PM ₁₀		Annual Mean	40µg/m ³	26.0	21.0	21.4	18.9	16.7
		24-Hour Mean (Number of Exceedances)	50µg/m ³ not to be exceeded more than 35 times per year	11	3	4	3	0
PM _{2.5}		Annual Mean	25µg/m ³	-	-	-	-	8.7
BT6		NO ₂	Annual Mean	40µg/m ³	37.0	29.0	28.7	27.7
	1 Hour Mean (Number of Exceedances)		200µg/m ³ not to be exceeded more than 18 times per year	0	0	0	0	0
	PM ₁₀	Annual Mean	40µg/m ³	19.0	19.0	17.6	16.7	15.2
		24-Hour Mean (Number of Exceedances)	50µg/m ³ not to be exceeded more than 35 times per year	4	4	0	1	0
	PM _{2.5}	Annual Mean	25µg/m ³	-	-	-	-	11.0
	BT8	NO ₂	Annual Mean	40µg/m ³	41.0	29.0	31.5	28.6
1 Hour Mean (Number of Exceedances)			200µg/m ³ not to be exceeded more than 18 times per year	0	0	0	0	0
PM ₁₀		Annual Mean	40µg/m ³	18.0	17.0	17.6	17.2	14.8
		24-Hour Mean (Number of Exceedances)	50µg/m ³ not to be exceeded more than 35 times per year	1	1	1	1	0
PM _{2.5}		Annual Mean	25µg/m ³	18.9	13.7	7.4	7.5	11.9

Table 2 shows that the annual mean NO₂ objective was exceeded between 2019 and 2022 at BT4 and in 2019 at BT8. This objective was met at all other monitors between 2019 and 2023. All other AQS objectives were met between 2019 and 2023. Pollutant concentrations have either reduced or remained the same at all automatic monitoring locations within LBB between 2019 and 2023.

It should be noted however that due to COVID-19, 2020 and 2021 monitoring data may not be representative of air quality concentrations in the area.

In 2023, annual mean NO₂ monitoring was undertaken within LBB at 127 locations using diffusion tubes. The monitoring results for the NO₂ diffusion tubes within 1km of the Site are presented in **Table 3**.

Table 3: Measured Concentrations at the LBB diffusion tubes within 1km of the Site

Site ID	Site Name	Classification	Approximate Distance to Site (km)	Annual Mean NO ₂ Concentrations (µg/m ³)				
				2019	2020	2021	2022	2023
60	Junction of Bridge Road / Forty Avenue	Roadside	0.4	47.9	33.1	44.3	42.7	24.2
62	Junction of Kings Drive Forty Lane	Roadside	0.5	40.6	26.6	30.4	31.6	31.0
61	Forty Lane, F/O Old Brent Town Hall	Roadside	0.6	65.0	49.6	61.2	59.0	25.2
SZ63	Preston Manor Upper School, Hollycroft Avenue	Roadside	0.7	-	-	19.8	20.0	21.2
64	The Paddocks, opposite 9 The Paddocks	Roadside	0.7	33.5	23.0	28.5	28.0	28.0
9	Junction of East Lane / Wembley Hill Road	Roadside	0.8	47.4	35.1	40.5	39.2	20.3
63	King's Drive, opposite 37	Roadside	0.9	26.0	19.0	20.5	20.2	27.9
PM28B	Clarendon Gardens	Roadside	1.0	-	-	21.4	21.2	18.0

Table 3 shows that the annual mean NO₂ objective was met at all diffusion tubes within 1km of the Site in 2023. The annual mean NO₂ concentrations declined at a majority of the LBB diffusion tubes within 1km of the Site from 2019 to 2023, except for SZ63 and 63.

In addition to the monitoring undertaken by LBB, background concentrations of NO_x, NO₂, PM₁₀ and PM_{2.5} are available from the Defra Air Quality Archive for 1 x 1km grid squares for assessment years between 2021 and 2040. **Table 4** presents the 2023 Defra background concentrations for the grid square covering the Site (519500, 186500).

Table 4: Defra Background Map Concentrations for the Grid Square of the Site

Pollutant	AQS Objective	2023 Annual Mean Concentration ($\mu\text{g}/\text{m}^3$)
NO _x	-	28.6
NO ₂	40 $\mu\text{g}/\text{m}^3$	19.8
PM ₁₀	40 $\mu\text{g}/\text{m}^3$	16.2
PM _{2.5}	25 $\mu\text{g}/\text{m}^3$	10.7

The data in **Table 4** shows that all AQS objectives were met in 2023.

Additionally, sensitive receptors to dust in the vicinity of the Site are likely to include:

- Residential properties in the surrounding area including along Brook Avenue, Kingswood Road, Elmside Road;
- Students and staff at Michaela Community School, located approximately 100m east;
- Students and staff at Ark Academy, located approximately 120m northeast;
- Wembley Park Synagogue, located approximately 250m southwest; and
- Chalkhill Community Centre mosque, located approximately 290m northeast.

Effects During Construction

During the demolition and construction works the following activities have the potential to give rise to air quality effects:

- Dust emissions and associated nuisance generated by the physical components of the works;
- Additional emissions to the atmosphere from the operation of construction plant and machinery; and
- Additional emissions to the atmosphere from construction related traffic generation.

However, these temporary effects would be expected at any construction site and would be minimised through compliance with legislative requirements and the implementation of environmental management control measures detailed within the CEMP (for example damping down of areas subject to ground-breaking, erection of appropriate hoarding and / or fencing to reduce dust dispersion and use of vehicles and selection of plant with low emission levels).

Effects once Proposed Development Complete and Operational

Given the Proposed Development will be car free (with the exception of two blue badge spaces), the Proposed Development is unlikely to result in a change in Annual Average Daily Traffic of more than 100 light duty vehicle flows or 25 heavy duty vehicle flows. The change in vehicle flows would therefore likely be below the Environmental Protection UK and Institute of Air Quality Management (EPUK/IAQM) guidance criteria.

Furthermore, as the Proposed Development will use Air Source Heat Pumps (ASHPs), rather than combustion-based heating such as gas boilers, the Proposed Development will not emit pollutants (NO_x, CO, and particulates) from the proposed building plant.

Based on the low trip generation, plant design, and according to the EPUK/IAQM guidance, the Proposed Development is not expected to give rise to air quality impacts. As such the likely effect of the operational Proposed Development on local air quality would not be significant.

A review of local monitoring data, and Defra background maps, conclude concentrations for future residential and hotel users of the Proposed Development would be not significant.

Summary

The Proposed Development is not considered likely to result in significant environmental effects in terms of air quality. As part of the planning application an Air Quality Assessment will be submitted.

Noise and Vibration

The Site is in a busy outer London location and is surrounded by a mix of land uses including residential and commercial. The noise environment is dominated by road traffic from the surrounding road network including Wembley Park Drive, as well as from Wembley Park Underground Station.

Sensitive receptors to noise near the Site are likely to include:

- Residential properties in the surrounding area including along Brook Avenue, Kingswood Road, Elmside Road;
- Students and staff at Michaela Community School, located approximately 100m east;
- Students and staff at Ark Academy, located approximately 120m northeast;
- Wembley Park Synagogue, located approximately 250m southwest; and
- Chalkhill Community Centre mosque, located approximately 290m northeast.

Effects during Construction

During the construction works, localised short-term, temporary increase in noise and vibration levels, as a result of the following activities are anticipated:

- Increased ambient noise and vibration from the operation of construction plant and machinery; and
- Increased road traffic noise from demolition and construction related traffic generation.

These temporary, short-term effects would be typical of any construction project and may lead to some localised disturbance to the neighbouring residential and commercial properties. The noise and vibration effects could be effectively managed through the compliance with legislative requirements via the implementation of environmental management control measures detailed within the CEMP.

Effects once Proposed Development Completed and Operational

Owing to the very good public transport links, it is understood that the completed Proposed Development would not feature any car parking provision (other than two blue badge spaces). Although there is the potential for adverse effects from delivery and servicing operations, this would be controlled through the Delivery, Servicing and Refuse Management Plan. Additionally, given the relatively high vehicle flows on the surrounding road network, changes in flow associated with the Proposed Development are anticipated to result in insignificant effects.

There would be some localised noise resulting from the operation of mechanical plant and building services. Plant noise egress at noise sensitive receptors will be controlled through their strategic location and acoustic attenuation/mitigation design measures, where required, to achieve the required LBB plant noise egress limits, thereby safeguarding residential amenity.

Summary

Mitigation in the form of setting noise limits from fixed plant/building services during operation and the implementation of a CEMP during demolition and construction would be put in place. In this regard, the Proposed Development is not considered likely to result in significant environmental effects in terms of noise and vibration. As part of the planning application, a Noise and Vibration Impact Assessment will be submitted.

Townscape, Visual and Heritage

A Townscape and Visual Impact Assessment (TVIA) will be undertaken to assess the potential effect of the Proposed Development on built heritage, townscape, and visual amenity.

Heritage

The area surrounding the Site is not considered to be heritage sensitive. The closest conservation area is Barn Hill Conservation Area, located more than 350m away from the Site. Lawns Court Conservation Area, also nearby, is located more than 400m away.

In addition, the Site does not contain any listed buildings, with the closest being:

- Three K6 telephone kiosks (Grade II), located approximately 450m south;
- Wembley Arena (formerly the Empire pool) (Grade II), located approximately 465m southwest; and
- Brent Town Hall (Grade II), located approximately 595m northeast.

The heritage assessment will have regard to statutory considerations applying to the setting of listed buildings, section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990⁷, as well as relevant case law establishing the great importance and weight which attaches to the avoidance of harm to designated heritage assets. Other considerations would include Brent's Local Plan and London Plan policies.

Where the Proposed Development may alter the surroundings in which a receptor is experienced, a qualitative assessment will be made of whether, how and to what degree the setting contributes to the significance (in heritage terms) of the receptor. The assessment will proceed on the basis of published best practice guidance and the staged approach advised therein.

Townscape and Visual Impact

The Site is located in the periphery of Wembley's Stadium Comprehensive Development Area, which features large-scale mixed-use developments of ranging heights, including tall buildings. It also falls within the visual corridor of Stadium Protected View 1, from Barn Hill, which contains a wide variety of building types generally organised around the north/south spine of Wembley Hill Road/Empire Way/Bridge Road. The area mediates as a physical transition from the large format development in the Stadium area to the wider residential suburbia. Wembley Park Station is the main activity generator and principle focus for the Wembley Park Corridor area. It is located less than 50m away from the Site.

The neighbouring plot to the north of the Site comprises five residential blocks ranging between 13 and 21 storeys, and the Site, in particular, is identified by the Wembley Area Action Plan (AAP)⁸ as appropriate for tall buildings and is also located within the wider Wembley Growth Area. Therefore, it is considered that the height and form of the Proposed Development would be consistent with the emerging character of the area and would contribute to the evolving skyline without appearing visually intrusive or out of scale with surrounding developments.

The framework for assessment of townscape and visual impact has been prepared using the Guidelines for Landscape and Visual Impact Assessment, Third Edition (Landscape Institute and Institute of Environmental Management and Assessment, 2013) ('GLVIA3'). The two components of townscape and visual assessment are:

- The assessment of townscape effects: assessing effects on the townscape as a resource in its own right; and

⁷ UK Public General Acts: Planning (Listed Buildings and Conservation Areas) Act 1990.

⁸ Brent Council (2015) *Wembley Area Action Plan: Adopted version*. Available at: <https://www.brent.gov.uk/-/media/files/business-documents/regeneration/waap-adopted-version.pdf?rev=4d694cc96ccd40db90ebf9590a33591d>

- The assessment of visual effects: assessing effects on the general visual amenity experienced by people. Specific views are also assessed where they form strategic views designated in the development plan, or where agreed with the competent authority.

Effects during Construction and Once Development is Complete and Operational

The Proposed Development would give rise to both temporary townscape and visual changes during the demolition and construction works and would result in permanent changes on completion of the Proposed Development.

The Proposed Development will improve the physical and urban environment and townscape context in the locality and will at least preserve the contribution made by setting to the significance of nearby heritage assets.

The assessment of the impact of the Proposed Development on a townscape receptor (i.e. townscape character area) will be made on the basis of professional judgment, which takes into account the relevant planning policies and guidance, cited above. It will be based on the methodology set out in GLVIA3, supplemented by advice contained in the LVMF.

The design has also been conceived mindful of relevant policy and guidance for the Site, including:

- The Planning (Listed Buildings and Conservation Areas) Act 1990;
- Salient sections of the NPPF (2024);
- The accompanying parts of the PPG;
- Conservation Area Appraisals for those areas within the study area;
- Historic Environment Good Practice Advice in Planning Notes 2 and 3 on The Assessment of Heritage Significance and The Setting of Heritage Assets (2015 and 2017); and
- Historic England Advice Note 4 – Tall Buildings (2022).

Summary

The visual, heritage and townscape effects of the Proposed Development will be assessed fully in the Townscape and Visual Impact Assessment report, and the Design and Access Statement submitted with the planning application. The visual impact is anticipated to be mitigated through the use of high-quality materials and appropriate massing, ensuring the building integrates sensitively within its context while enhancing the river frontage and public realm.

Given the dense existing context, the lack of nearby heritage assets, and the existing character of the locality, the Proposed Development is not considered likely to result in any significant adverse effects in terms of heritage, townscape and visual impacts.

Archaeology

An archaeological priority area is an area defined to help protect archaeological remains that might be affected by development. The Site is not located within nor within the vicinity of any of LBB's Archaeological Priority Areas (APAs).

The Site does not contain any scheduled monuments, with the closest being the 'Medieval moated site, 454m south-west of Sudbury Golf Club House', located approximately 3.1km southwest.

Effects during construction

There is the possibility for the potential disturbance, removal and / or destruction during the excavation works on the Site. It is likely that the majority of archaeology has been removed by the construction of the existing buildings on the Site although the precise extent of survival of archaeological remains and burials is uncertain and may only be determined through archaeological evaluations and appropriate mitigation as identified by the evaluation during the excavation works and subsequent stages of the Proposed Development.

Effects once development is complete and operational

Owing to the fact that the completed and operational Development would not involve any activities that would cause additional ground disturbance, no completed and operational effects to buried heritage assets would occur during this phase.

Summary

The Proposed Development is not considered likely to result in significant environmental effects in terms of archaeology. However, if considered necessary by LBB, a suitably worded planning condition, such as a requirement for an archaeological watching brief, could be attached to any consent. In addition, an Archaeological Impact Statement will be submitted alongside the planning application.

Microclimate – Daylight, Sunlight, Overshadowing and Solar Glare

Effects during Construction

Effects in relation to daylight, sunlight and overshadowing will vary throughout the demolition and construction phase. They would likely be as a result of cranes or plant required on Site, and the effects would gradually change during the construction phase until the Proposed Development is complete and operational. Effects relating to construction plant would be considered temporary in nature and are not considered likely to have significant effect.

Effects Once Development is Complete and operational

The scale and massing of the Proposed Development can give rise to potential effects on the available levels of daylight, sunlight and shadow adjacent to the Site. Consequently, these have been major considerations in the design process to date, in particular in relation to daylight, sunlight and overshadowing.

Owing to the proximity of the Proposed Development to Wembley Park station, the issue of solar glare will be considered, although the effects are unlikely to be significant as the façades of the Proposed Development would not be highly reflective in design and are therefore unlikely to cause a nuisance to users of adjacent roads and train drivers.

Overall, therefore, it has been considered likely that the proposed Development will not result in any significant changes in the daylight and sunlight received by the adjacent properties. A Daylight, Sunlight and Overshadowing Assessment (Internal and External) will be submitted with the planning application to consider in detail the effect of the completed Proposed Development both to the surrounding sensitive receptors and within the Proposed Development itself. Ongoing assessment work will continue to inform the design as it progresses.

Summary

Given the above, the Proposed Development is not considered likely to result in unacceptable environmental effects in terms of daylight, sunlight and overshadowing. In addition, a Daylight, Sunlight and Overshadowing Assessment (External) will be submitted with the planning application.

Light Pollution

Due to the presence of the existing hotel (Premier Inn) building on the Site, the potential existing levels of artificial lighting are relatively high. Similarly, artificial light is likely to be high in areas surrounding the Site which comprise road and street lighting and lighting associated with the nearby residential and commercial units.

Effects during Construction

During demolition and construction works which form part of the Proposed Development, there may be periods where floodlighting / security and health and safety lighting will be required. However, a CEMP will be prepared and agreed with LBB prior to the commencement of works. As part of the CEMP, measures will be implemented to minimise artificial light spill and glare to nearby sensitive receptors. As such, and accounting for the relatively high existing levels of artificial light associated within the Site and its surroundings, the works are not likely to give rise to any significant light pollution effects.

Effects Once Development is Complete and operational

In respect of the completed and operational Proposed Development, a detailed lighting strategy / design will be agreed in advance of the completion of the Proposed Development with LBB. It is anticipated that such a strategy will be designed to relevant British Standards and will take account of the Institute of Light Professionals (ILP) 'Guidance Notes for the Reduction of Obtrusive Light'⁹. Accounting for this and the already relatively high levels of artificial light within and surrounding the Site, the completed and operational Proposed Development is unlikely to give rise to any significant light pollution issues. Given the lighting installations will adhere to relevant guidance and standards, any increase in light spill is not likely to give rise to significant effects.

Summary

Given the above, the Proposed Development is not considered likely to result in significant environmental effects in terms of light pollution.

Microclimate – wind

Effects during Construction

During the construction phase, there may be some temporary changes to the wind microclimate surrounding the Site due to partially completed structures, and this may affect pedestrians using the public footpath crossing the Site. However, this would be a temporary effect, and it is generally accepted that pedestrians would tolerate adverse conditions as they understand the temporary situation. As such, no significant effects would be likely to arise.

Effects Once Development is Complete and operational

A Wind Assessment will be undertaken using computational fluid dynamics (CFD), benchmarked against the Lawson Comfort Criteria (LDDC industry standard variant) and considering the Baseline (existing) Site, the introduction of the Proposed Development and consideration of the impact of nearby Cumulative (future) schemes around the Site. A technical report will be submitted as a part of the planning application.

Where required, mitigation measures will be recommended for the Proposed Development, comprising of features to provide localised shelter to any affected areas with windier than desired conditions such as canopies, screens and landscaping. The Proposed Development incorporates an outdoor seating area and amenity space. Particular attention will be paid to ensuring that safety thresholds are considered for the uses to be brought forward within the Site.

Should mitigation measures be required, particularly in any case where strong winds are expected, further assessment would be undertaken to evaluate the effectiveness of such mitigation to ensure a safe and comfortable wind environment is achieved.

⁹ The Institute of Light Professionals (2021); Guidance Note 01/21: for the reduction of obtrusive light 2021.

Summary

Provided the measured wind climate behaviour is as anticipated in the initial wind microclimate assessments (without mitigation), the Proposed Development is not considered likely to result in significant environmental effects in terms of wind microclimate. Following the wind testing and technical report, any required mitigation will be identified and implemented into the Proposed Development design.

Waste

Effects during Construction

The demolition of the existing structures within the Site will inevitably generate waste but works will be carried out in accordance with an agreed CEMP and Site Waste Management Plan. This would ensure that waste is managed in line with relevant legislation and best practice to maximise reuse and recycling. Construction waste would be managed in accordance with the measures set out in the CEMP.

Effects Once Development is Complete and operational

In terms of operational waste, the Proposed Development would provide sufficient space for the storage of segregated general and recyclable waste, in accordance with local policy. This will be further detailed within documents submitted with the planning application. In addition, the servicing and facilities management of the Proposed Development would ensure that adequate waste collection occurs as necessary.

Summary

The Proposed Development is not considered likely to result in significant environmental effects in terms of waste.

Risk of Major Accidents and Disasters

The Site is not located in an area that will give rise to a significant risk of major accidents and disasters, specifically:

- The Site is not located in a safeguarded aviation zone;
- The Site and its environs are not in an area of high radon levels;
- The Site and its environs are not in an area affected by historic coal mining; and
- The Site is not located in the vicinity of any Control of Major Accident Hazard (COMAH) sites.

The implementation of the CEMP and adherence to legislative requirements will ensure that the demolition and construction works do not give rise to significant risks associated with contamination and flooding. In addition, all works will be undertaken in line with the Construction (Design and Management) Regulations 2015.

The complete and operational Proposed Development comprises a non-industrial development, so the risk of accidents and disasters in relation to the end use of the Site is inherently low.

Greenhouses Gases and Climate Change

Climate change is a global issue. The scale and nature of the Proposed Development is such that the construction and operation of the Proposed Development would not significantly contribute to global climate change. However, as far as practicable, the Proposed Development will be designed to minimise greenhouse gas emissions and to ensure resilience to climate change. The design is being informed by the Applicant's Sustainability Consultant and Building Services Engineer and will ensure that policy requirements and best practice guidelines are fully considered as part of the iterative design process.

As noted previously, there are a number of measures to minimise greenhouse gas emissions, such as the following:

- The selection and use of building materials from sustainable sources and will low embodied carbon;
- Selection of building fabric to minimise heat loss and reducing heating energy demand;
- The provision of a low emission, low carbon and highly efficient course of heat and energy for the Proposed Development; and
- The Proposed Development is being designed to ensure that there are inherent design measures which will safeguard against flooding risks, accounting for climate change.

Enclosure 3: Preliminary Ecological Appraisal (PEA)



Wembley Park, London

Preliminary Ecological Appraisal

June 2025

Waterman Infrastructure & Environment Ltd



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Client Name: Whitbread Group PLC
Document Reference: 21431101-WAT-XX-XX-RP-N-750001
Project Number: WIE21431-101

Quality Assurance – Approval Status

This document has been prepared and checked in accordance with
 Waterman Group's IMS (BS EN ISO 9001: 2015, BS EN ISO 14001: 2015 and BS EN ISO 45001:2018)

Revision	Status	Date	Prepared by	Checked by	Approved by
P01	S1	June 2025	Samantha Ready Senior Ecologist	Lee Mantle Principal Ecologist	Diane Corfe Technical Director – National Ecology Lead
					

Comments

Comments

Comments

Revision	Status
<i>Pnn</i> Preliminary (shared; non-contractual)	S1 Coordination
<i>Cnn</i> Contractual	S2 Information
	S3 Review & Comment
	S4 Review & Authorise
	S5 Review & Acceptance
	A0, A1, An Authorised & Accepted (<i>n</i> =work stage if applicable)

Disclaimer

This report has been prepared by Waterman Infrastructure & Environment Ltd, with all reasonable skill, care and diligence within the terms of the Contract with the client, incorporation of our General Terms and Condition of Business and taking account of the resources devoted to us by agreement with the client.

We disclaim any responsibility to the client and others in respect of any matters outside the scope of the above.

This report is confidential to the client and we accept no responsibility of whatsoever nature to third parties to whom this report, or any part thereof, is made known. Any such party relies on the report at its own risk.

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Contents

1. Introduction

- 1.1 Waterman Infrastructure & Environment Ltd (Waterman IE) was commissioned by Whitebread Group PLC to carry out a Preliminary Ecological Appraisal (PEA) at Wembley Park Drive (hereafter referred to as the 'Site').

Site Setting

- 1.2 The Site (**Figure 1**) is approximately 0.40 hectares (ha) in size and centred on the Ordnance Survey Grid Reference TQ 19254 86266. The Site is situated on Wembley Park Drive, in the north-west of London. The Site is bounded by Wealdstone Brook on the southern side, with roads and pedestrianised areas including Bridge Road and Brook Avenue enclosing the remaining sides. The wider area is largely residential, with Wembley Park tube station to the north and commercial land associated with Wembley Stadium further to the south. There are two waterbodies present within 500m of the Site including Wealdstone Brook which runs directly adjacent to the southern boundary of Site.

Development Proposals

- 1.3 The current development proposals (hereafter referred to as the proposed 'Development') broadly comprise:

'The Demolition of existing building and car park and redevelopment of the site to provide two buildings, delivering a hotel (C1) building up to 16 storeys, and a purpose-built student accommodation (Sui Generis) building up to 33 storeys with associated communal amenity space, a flexible commercial space (Use Class E) and the delivery of wider public realm improvements comprising hard and soft landscaping and other associated works.'

Objectives of this PEA

- 1.4 As detailed within industry guidance¹, a PEA identifies the ecological constraints and opportunities at a proposed development site. It is informative and not suitable for planning submission as the findings inform the emerging scheme design process, including the identification of additional ecological surveys, ecological mitigation, compensation and enhancement measures. The purpose of this PEA is to:
- Establish an accurate baseline and identify the potential for 'Important Ecological Features' (IEFs) to be present within the identified Zone of Influence (Zol);
 - Inform master-planning to allow significant ecological effects to be avoided or minimised wherever possible;
 - Identify the need for further ecological survey and assessments, as required;
 - Allow initial mitigation measures (in line with the Mitigation Hierarchy²) to be developed, to ensure compliance with nature conservation legislation and planning policy (**Appendix A**); and
 - Allow initial ecological opportunities and enhancement measures to be developed to ensure compliance with nature conservation legislation and planning policy (**Appendix A**)

¹ Chartered Institute of Ecology and Environmental Management (2017). Guidelines for Preliminary Ecological Appraisal. Technical Guidance Series

² BS 42020:2013 Clause 5.2

2. Methodology

Scope of the Appraisal

2.1 This section summarises the methodologies used for undertaking the PEA based on current guidelines. This PEA comprised an ecological desk study, ‘Extended’ UK Habitat Classification (UKHab) Field Survey, a Habitat Condition Assessment (HCA), a Daytime Bat Walkover (DBW) including a Preliminary Roost Assessment (PRA) of buildings and a Ground Level Tree Assessment (GLTA) of trees for roosting bat suitability and an incidental search for common species of Invasive Non-Native Species (INNS) of plant.

Zone of Influence

2.2 The ZoI is the area(s) over which ecological features may be impacted by the biophysical changes caused by the proposed Development. Based on the scale and nature of the proposed Development, it has been assessed that the ZoI arising from the construction works and operational development is unlikely to be greater than those distances used for the ecological data search being:

- 10km for Statutory Designated Sites – International/European level.
- 500m for Habitats of Principal Importance and waterbodies (for amphibians).
- 2km for all other IEFs.

2.3 The ZoI will be subject to review as the proposed Development design is fixed and as part of any subsequent ecological impact assessment (EclA) required for planning submission.

2.5 As referenced in industry guidance, Important Ecological Features (IEFs) that are anticipated to be affected by the proposed Development have been identified and subject to assessment. In this report, designated sites, habitats and species that fall into the categories in **Table 1** have been identified as being ecologically important and/or legally protected/controlled and form the scope of data gathering during the ecological desk study and site surveys.

Table 1: Geographical Scale of Important Ecological Feature Categories

Geographical Level of Importance	Category
International	<p>Statutory designated sites: Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites (including candidate SACs and proposed SACs, SPAs and Ramsar sites) within England.</p> <p>A viable area of a habitat type listed in Annex I of the Habitats Directive, or smaller areas of such habitat essential to maintain the viability of a larger whole.</p> <p>Regularly occurring populations of a species, large enough in number to be of international importance where:</p> <ul style="list-style-type: none"> • The loss or degradation of these populations would adversely affect the conservation status or distribution of the species at this geographic scale. • The population forms a critical part of a wider population at an international level. • The species is at a critical phase of its life cycle at this scale.
National	<p>Statutory designated sites: Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNR).</p> <p>Ancient Woodland.</p>

Geographical Level of Importance	Category
	<p>A viable area of a Habitat of Principal Importance (HoPI) as listed on Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006³, or smaller areas of such habitat essential to maintain the viability of a larger whole.</p> <p>Resident, or regularly occurring, populations of species, significant at an International, European, UK or National level where:</p> <ul style="list-style-type: none"> • The loss of these populations would adversely affect the conservation status or distribution of the species at a national level • The population forms a critical part of a wider population at this scale • The species is at a critical phase of its life cycle at this scale.
Regional/County	<p>Local Nature Reserves (LNR).</p> <p>Habitat areas which meet the published selection criteria for county site designations, but which are not themselves designated as such.</p> <p>Species – as per National level but where the loss of these populations would negatively affect the conservation status or distribution of the species at a regional/county level and where populations/species are critical at the regional/county scale.</p> <p>This may include locally significant populations of a species and areas of habitat listed in a County BAP on account of its regional rarity or localisation (i.e. London Environment Strategy (LES)⁴.</p>
District/Borough	<p>Non-statutory designated wildlife sites of district/borough value.</p> <p>Species – as per Regional/County level but where the loss of these populations would negatively affect the conservation status or distribution of the species at a district level and where populations/species are critical at the district/ borough scale.</p> <p>This may include locally significant populations of a species and areas of habitat listed in a District/Borough BAP on account of its regional rarity or localisation (i.e. Brent Local Action Plans⁵)</p>
Local	<p>Non statutory designated sites of local value.</p> <p>Sites of Importance for Nature Conservation (SINCs) within the London Borough of Brent.</p> <p>Areas of habitat considered to appreciably enrich the habitat resource within the local context (e.g. species-rich hedgerows, ponds etc.). It may also include sites that retain other elements of semi-natural vegetation that due to their size, quality or the wide distribution of such habitats within the local area are not considered for local designations.</p> <p>Populations/assemblages of species that appreciably enrich the biodiversity resource within the local context. Populations of county level important species that are not threatened or rare in the county and are not integral to maintaining those populations.</p>
Site	<p>Habitats and/or species that are of limited ecological importance due to their size, species composition or other factors. Areas of heavily modified or managed vegetation of low species diversity.</p> <p>Low or moderate numbers of common and widespread species.</p>
Legislation	<p>Species included on Schedules II and IV of The Conservation of Habitats and Species Regulations 2017 (as amended);</p>

³ ODPM (2006) 'Natural Environment and Rural Communities Act'

⁴ Greater London Authority (2018): London Environment Strategy

⁵ DEFRA (2014) Magic Map. Available at: <https://magic.defra.gov.uk/MagicMap.aspx> (Accessed: 09 February 2024).

Geographical Level of Importance	Category
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Species included on Schedules 1, 5 and 8 of the Wildlife and Countryside Act 1981 (as amended), excluding species that are only protected in relation to their sale (Section 9[5] and 13[2]); and

Badgers, which are protected under the Protection of Badgers Act 1992.

Desk Study

2.6 The desk study comprises a review of publicly available information and information provided by the Local Environmental Records Centre (with search distances detailed in paragraph 2.2), to identify IEFs that may not be apparent during the Field Survey and to provide further information relating to identified IEFs. Information sources include (but are not limited to):

- Greenspace Information for Greater London (GiGL) (supplied April 2025):
 - Records relating to all notable, priority and legally protected species.
 - Records of locally designated sites.
- Multi-Agency Geographic Information for the Countryside (MAGIC)⁶:
 - Statutory international sites of nature conservation.
 - Site of Special Scientific Interest Impact Risk Zones (IRZ) to assess planning applications for likely impacts on SSSIs.
 - HoPI and Ancient Woodland.
 - European Protected Species (EPSL) mitigation licences (within 2km of the Site).
- Aerial photography (www.google.com/maps)⁷
 - Local environmental context (e.g. barriers to wildlife dispersal and ecological connectivity pathways)

Field Survey

- 2.7 The Field Survey of the Site was undertaken on 16th of April 2025, by Senior Ecologist Susie Lowe (associate member of CIEEM) and Environmental Apprentice Eva Crow. The Field Survey was completed in accordance with methodology outlined in the UK Habitat Classification User Guide 2.0⁸, with the type and extent of each habitat present within the Site and immediately adjacent (where relevant) recorded.
- 2.8 A fine scale Minimum Mapping Unit (MMU) was deemed an appropriate level for mapping habitats i.e. a habitat area was only mapped if the habitat was greater than 25m² (area habitats) or 20m in length / 5m width (linear habitats).
- 2.9 Each habitat parcel was assigned a Primary Code of the Professional Edition of the UKHab Field Key using the Habitat Definitions for reference. Secondary Codes (SC) were then applied to provide additional context to the habitats.
- 2.10 The survey methodology was 'Extended' by undertaking an assessment of the Site's potential to support protected and notable/priority species as detailed in the sections below.

⁶ DEFRA (2014) Magic Map. Available at: <https://magic.defra.gov.uk/MagicMap.aspx> (Accessed: 09 February 2024).

⁷ Google (2024) Google maps. Available at: <https://www.google.com/maps> (Accessed: 16 February 2024).

⁸ UK Habitat Ltd (2023). UK Habitat Classification Version 2.0 (at <http://www.ukhab.org>)

2.11 The Field Survey of the Site was conducted under weather conditions deemed appropriate for survey, being dry and sunny.

Habitat Condition Assessment

2.12 To inform any future Biodiversity Net Gain assessments which may also be required for the Site, a condition assessment of habitats present within the planning boundary was undertaken in accordance with the Biodiversity Metric 4.0 User Guide⁹ and Habitat Condition Sheets¹⁰ alongside the Field Survey on 16th April 2025. The results of the Habitat Condition Assessments will be provided in a separate BNG assessment report, as required.

Daytime Bat Walkover

2.13 As part of the Field Survey, a DBW was also undertaken to assess and record any habitats suitable for bats to roost, commute and forage on Site and within the surrounding areas. Alongside the DBW, an external ground-based PRA and GLTA were undertaken at the buildings and trees on Site to determine their suitability to support roosting bats, based on criteria detailed in **Table 2** and **Table 3 respectively**. As part of the PRA and GLTA, a number of factors were considered, including the presence of features suitable for use by roosting bats, proximity to foraging habitats or cover, and potential for disturbance. Notes were made relating to relevant characteristics of features providing potential access points and roosting opportunities (i.e. Potential Roosting Features (PRFs)).

Preliminary Roost Assessment

2.14 The PRA was based on industry guidelines at the time of the survey¹¹ and included a visual inspection (including the use of binoculars and torches where appropriate) of the exterior each building for evidence of bat use. Evidence of, or the potential for, utilisation of the buildings by bats was determined through the presence of the following field signs:

- Bat droppings (which can accumulate under an established roost);
- Oil (from fur) and urine stains; and
- Scratch marks.

2.15 The surveys were based on current best practice guidelines at the time of the survey (referenced above) and were combined due to the small size of the Site.

Table 2: Bat Suitability of the Site - Assessment Criteria

Potential Suitability	Description - Roosting Habitats in Structures	Description – Potential Flight Paths and Foraging Habitats
None	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).	No habitat features on site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide continuous lines of shade/protection for flight-lines or generate/shelter insect populations available to foraging bats).
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can	No obvious habitat features on site likely to be used as flight-paths or by foraging bats; however, a small element of uncertainty remains

⁹ Defra (2023): The Biodiversity metric 4.0 – User Guide.

¹⁰ Defra (2023): The Biodiversity metric 4.0 - Technical Annex 1 (Condition Assessment Sheets and Methodology)

¹¹ Collins, J. (ed) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edn). The Bat Conservation Trust, London. ISBN 978-1-7395126-0-6

Potential Suitability	Description - Roosting Habitats in Structures	Description – Potential Flight Paths and Foraging Habitats
	use small and apparently unsuitable features on occasion.	in order to account for non-standard bat behaviour.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site, but could be used by individual hibernating bats).	Habitat that could be used by small numbers of bats as flight-paths such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).	Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flight-paths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close to and connected to known roosts.

Ground Level Tree Assessment

2.16 The GLTA was based on industry guidelines at the time of the survey (as referenced above). The GLTA included a visual inspection (including the use of binoculars and torches where appropriate) of the exterior each tree for evidence of bat use. Evidence of, or the potential for, utilisation of the trees by bats was determined through the presence of the following field signs:

- Bat droppings (which can accumulate under an established roost);
- Oil (from fur) and urine stains; and
- Scratch marks.

Table 3: Tree Suitability for Roosting Bats Guidelines

Potential Suitability	Description
PRF	A tree with at least one PRF present.
FAR	Further Assessment Required to establish if PRFs are present in the tree.
NONE	Either no PRFs in the tree or highly unlikely to be any.

Invasive Non-Native Plant Species

2.17 As part of the Field Survey, the Site was searched for the presence of common and readily identifiable invasive non-native plant species (INNS), however the purpose of a PEA is not to identify an exhaustive INNS list but to confirm presence and make outline recommendations for further work depending on the development proposals. Species searched for included those on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) and the London Invasive Species Initiative (LISI)¹² and included Japanese knotweed *Reynoutria japonica*, giant knotweed *Fallopia sachalinensis*, hybrid knotweed *Fallopia baldschuanica*, giant hogweed *Heracleum mantegazzianum*, Himalayan balsam *Impatiens glandulifera*, buddleia *Buddleja davidii*, cotoneaster *Cotoneaster sp.*, Virginia creeper *Parthenocissus quinquefolia*, tree of heaven *Ailanthus altissima* and false acacia *Robinia pseudoacacia*.

Important Ecological Feature Appraisal

- 2.18 Data gathered as part of this PEA has been used to identify potential IEFs (i.e., designated sites, habitats and species as listed in **Table 1**) that are anticipated to be affected by the proposed Development within the Zol.
- 2.19 However, not all the IEFs within the Zol have the potential to be significantly affected by the proposed Development, or the legislation pertaining to them to be contravened. Therefore, where features are unlikely to be affected by the Proposed Development, or where any effects that impact IEFs are unlikely to be significant, for the reasons¹³ listed below, such features have been scoped out of the appraisal:
- No pathway of effect has been identified, for example the feature is sufficient distance from the Site or there is the presence of a barrier between its location and the Site¹⁴ ; or
 - The feature is of insufficient biodiversity conservation value within the Zol, due to its quality, extent or population size¹⁵.
- 2.20 For all remaining features scoped into the appraisal, the pathway of effect (e.g., habitat loss, lighting, noise etc.) and potential impact of this on the feature have been identified.

Constraints and Limitations

- 2.21 No constraints were encountered as part of the Field Survey.
- 2.22 All other contractors, designers and the client should be aware of the following: The design recommendations within this report are assessed to be the most effective ecological solution at this initial stage of the project. No other pre-construction information has been provided, obtained, or referred to during the preparation of this report (including, but not limited to, services information, geotechnical reports, and ordnance reports). In deciding whether and how to progress with this project, it will be incumbent upon the client, designers, and contractors to obtain and refer to relevant pre-construction and maintenance information, as required by the Construction (Design and Management) Regulations to ensure compliance.

¹² LISI | London Invasive Species Initiative (londonisi.org.uk)

¹³ Positive or negative effects on ecological features that have the potential to influence a planning decision are considered to be significant.

¹⁴ Whilst the Zol of potential effects arising from the development is up to 2km from the Site, the ecological Zol (within which the feature could be affected) for each feature may vary and for some features may be much less, e.g. great crested newts generally move up to a maximum of 500m from a breeding pond and movement can be restricted by barriers such as busy roads and fast flowing rivers

¹⁵ E.g. whilst a Priority Species such as skylark *Alauda arvensis* or house sparrow *Passer domesticus* is of National importance (**Table 2**), the impact of development on individual or a small population of such a species, which are generally commonly found, is unlikely to be assessed as significant.

3. Results

Designated Sites

Statutory Sites

- 3.1 No Internationally designated statutory sites are located within 10km of the Site, however two nationally designated sites, Brent Reservoir SSSI/LNR and Fryent Country Park LNR are present within 2km of the Site (**Figure 2**). Details are provided in **Table 4** below.

Table 4: Statutory Sites within the 2km Zol of Site

Site Name	Designation	Distance from Site (km)	Description
Brent Reservoir (Welsh Harp)	SSSI and LNR	1.75 NE	Brent Reservoir, fed by the Silk Stream and the River Brent, has been designated due to the breeding and wintering bird assemblages present in its wetland habitats. Habitats present include open waters, marshes, fen and willow carr.
Fryent Country Park	LNR	0.88 N	The park consists of meadows, ponds, lakes, hedges and woodland, and is popular with ramblers and nature enthusiasts. The area is a designated nature reserve and is used by conservation groups. Over 800 species of wildlife live here, amongst them 21 types of butterfly and 80 birds. The meadows are cut for hay once a year in July, before being transported to a farm.

- 3.2 Additionally, the review of MAGIC confirmed that the Site falls within a SSSI Impact Risk Zone (IRZ) associated with Brent Reservoir SSSI. The proposed Development does not fall within a category that triggers the need for consultation with Natural England under the IRZ criteria. As such, no adverse impacts on statutory designated sites are anticipated, and consultation with Natural England is not required at this stage.

Non-Statutory Sites

- 3.3 One non-statutory designated Site, the River Brent, is located directly adjacent to the southern boundary of the Site (**Figure 2**). A further 18 Sites of Importance for Nature Conservation (SINCs) are located within 2km of the Site. **Table 5** below details the SINCs within 1km of the Site.

Table 5: Non-Statutory Sites within the 1km of Site

Site Name	Designation	Distance from Site (km)	Description
Wealdstone Brook Wembley Park Section	Site of Borough Importance Grade II (SBIGII)	Directly adjacent	Wealdstone Brook runs in an open concrete culvert heavily shaded by woodland. The dominant tree species are ash and sycamore, with hawthorn and holly.

Site Name	Designation	Distance from Site (km)	Description
Fryent Country Park	Site of Metropolitan Importance (SMI)	0.88 NE	The park consists of meadows, ponds, lakes, hedges and woodland, and is popular with ramblers and nature enthusiasts. The area is a designated nature reserve and is used by conservation groups. Over 800 species of wildlife live here, amongst them 21 types of butterfly and 80 birds. The meadows are cut for hay once a year in July, before being transported to a farm.
Jubilee Line for Stanmore Junction to Queensbury	Site of Borough Importance Grade I (SBIGI)	0.05 N	Jubilee line sides are largely a mix of broad-leaved woodland and tall ruderal vegetation which is dominated by bramble. Small areas of more neutral grassland occurs in some areas.
Brent River Park, Wembley	SBIGI	0.5 SE	Section of the River Brent that is channelled through a steep sided gorge. The woodland is a dense, semi-natural broadleaved area dominated by Ash. The field layer contains species like wood avens, ribwort plantain, bird's-foot trefoil, common mallow, and broad-leaved willowherb and Japanese knotweed is also present.
Quanton Street Open Space	SBIGI	0.77 E	A semi-natural broadleaved woodland adjacent to a stretch of the River Brent.
Chiltern Line between River Brent and Sudbury Hill Harrow	SBIGI	1.0 S	A railside with a mosaic of trees, bushes, tall perennials, grassy vegetation and ruderal species. The mixture of vegetation of different heights, species and structure provides food, breeding sites and shelter for a wide diversity of birds, reptiles, mammals and insects.
Wembley Park Sports Field	Site of Local Importance (SLI)	0.29 N	An open canopy woodland featuring native pedunculate oak trees, along with turkey oak, ash, silver birch, and field maple. The understory is made of shrubs and rough grassland dominated by species like cock's-foot and false oat-grass.

Habitats

Desk Study

- 3.4 There are no records of ancient woodland within the Zol.
- 3.5 One HoPI is present within 500m of the Site boundary, an area of deciduous woodland located approximately 60m west of Site, located directly adjacent to the south of the River Brent (**Figure 2**).

Field Survey

- 3.6 **Table 6** summarises the Primary and Secondary Codes used to categorise the habitats recorded during the Field Survey. The habitat descriptions given below should be read in conjunction with **Figure 3**, the photographs presented in **Appendix B**.

Table 6: Habitat Types Recorded During Field Survey

Level 2 Code / Label	Level 3 Code / Label	Level 4 Code / Label	Level 5 Code / Label	Secondary Codes
h / Heathland and scrub	h2 / Hedgerows	h2b / Non-native and ornamental hedgerow		
u / Urban	u1 / Built-up areas and gardens	u1b / Developed Land; sealed surface		32- Scattered trees
u / Urban	u1 / Built-up areas and gardens	u1b / Developed Land; sealed surface	u1b5 - Buildings	815 – commercial
w / Woodland and forest	w1 / Broadleaved and mixed woodland	w1g / Other broadleaved woodland		
r / Rivers and lakes	r2 / Rivers and streams	r2b / Other rivers and streams		

Non-native and ornamental Hedgerow (h2b)

- 3.7 A non-native and ornamental hedgerow (H1) (Plate 1) comprised of semi-mature laurel *Laurus nobilis*, hornbeam *Carpinus betulus*, and also contained a stand of Japanese knotweed (TN1, Plate 2) present along the eastern boundary of the car park.

Developed Land; sealed surface (u1b)

- 3.8 The Site predominantly comprises hardstanding in the form of a car park associated with the commercial building (Plate 4 and Plate 5), footpaths (Plate 6) and a paved seated area (Plate 7).
- 3.9 Seven semi-mature London Plane trees *Platanus x hispanica* (T1-T7) are present within the paved area adjacent to the car park (Plates 13-19).

Buildings (u1b5)

- 3.10 A six-storey hotel is present on Site (B1). The façade is made of red brick and concrete (Plate 8) with glass cladding (Plate 9). Bird netting is present on the building (TN2, Plate 10).

Other broadleaved woodland (w1g)

- 3.11 A parcel of woodland is situated on the southern border of Site, adjacent to Wealdstone Brook. Species include laurel, hornbeam, maple *Acer*, firethorn *Pyracantha* and ivy *Hedera helix* (Plate 11 and Plate 12).

Off Site habitats of Relevance

Other Rivers and Streams (r2b)

- 3.12 Wealdstone Brook (Plate 3), a tributary of the River Brent flows directly adjacent to the southern border of Site.

Protected, Priority and other Notable Fauna and Flora

Bats

Desk Study

- 3.13 Multiple bat records within 2km of the Site were provided by the data search, with the nearest records of common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus*, nathusius's pipistrelle *Pipistrellus nathusii*, noctule *Nyctalus noctule*, Leisler's *Nyctalus leisleri* and serotine *Eptesicus serotinus*, all located 0.10km east of the Site.
- 3.14 The MAGIC search identified no bat EPSL licences or survey returns within 2km.

Field Survey

- 3.15 During the Field Survey and as part of the PRA no PRFs were recorded at building B1. Building B1 is therefore assessed to have a suitability rating of '**Negligible**' for roosting bats. Additionally, and as part of the GLTA, no PRFs were identified on the scattered urban trees present, or within the broadleaved woodland. The trees on Site are therefore assessed to have a suitability rating of '**NONE**' for roosting bats.
- 3.16 During the Field Survey and as part of the DBW the habitats within the Site notably the hedgerow and broadleaved woodland and adjacent Wealdstone Brook were assessed to provide foraging and commuting opportunities for bats (as well as providing connectivity to other suitable habitats present within the wider landscape). However, and given the sites urban location it is assessed that these habitats provide an overall '**Low**' suitability for foraging and commuting bats.

Breeding Birds

Desk Study

- 3.17 The data search returned multiple records for bird species commonly found in urban environments, records of Schedule 1 bird species including kingfisher *Alcedo atthis*, red Kite *Milvus milvus*, honey-buzzard *Pernis apivorus*, goshawk *Accipiter gentilis*, peregrine *Falco peregrinus*, hobby *Falco subbuteo*, woodlark *Lullula arborea*, black redstart *Phoenicurus ochruros*, fieldfare *Turdus pilaris*, redwing *Turdus iliacus*, and little Egret *Egretta garzetta*.

Field Survey

- 3.18 The non-native ornamental hedgerow, scattered urban trees, and the broadleaved woodland (adjacent to the Wealdstone Brook) provides suitable nesting and foraging habitat for a range of bird species. During the Field Survey bird netting was noted on the lower levels of the building (B1) to discourage the use of the ledges present from use by urban bird species.
- 3.19 Habitats within the Site are not considered suitable to support a notable bird assemblage, however, they do provide nesting opportunities for common and widespread species.

Terrestrial Invertebrates

Desk study

- 3.20 The data search returned 64 records of invertebrates. The closest record was of a stag beetle *Lucanus cervus*, recorded approximately 0.12km north east from the Site.

Field Survey

- 3.21 The Site's vegetated habitats are likely to offer some opportunities for common species of invertebrates. However, owing to the extent and relatively limited floral diversity of these habitats, it is considered unlikely that they would support any large populations or notable species.

Reptiles

Desk Study

- 3.22 The data search identified three records of reptiles within 2km of the Site. The closest record was a slow-worm *Anguis fragilis* located 0.9km south of the Site.

Field Survey

- 3.23 The habitats within the Site boundary are considered sub-optimal to support notable populations of reptiles due to dense vegetation, lack of refugia/hibernacula for hibernation and limited foraging habitat. However, the absence of suitable reptile habitat within the surrounding area, high level of disturbance and the lack of suitable dispersal corridors connecting to the Site mean it is unlikely that reptiles would be present on Site.

Flora (including INNS)

Desk Study

- 3.24 The data search returned notable records of Invasive Non-Native Species (INNS) of plants within 2km of the Site. These include high numbers of Japanese Knotweed, goat's-rue *Galega officinalis* and shaggy soldier *Galinsoga quadriradiata*,

Field Survey

- 3.25 During the Field Survey a stand of Japanese knotweed (TN1) was recorded within H1 to the east of the Site.

Other notable species

Desk Study

- 3.26 The desk study returned multiple records of common toad *Bufo bufo* and common frog *Rana temporaria*, with the most recent records being 1.2km north of the Site in 2018 and 2019 respectively. No records of other amphibian species were returned. The MAGIC search found no great crested newt (GCN) class survey licence returns within 2km of the Site. The data search returned no records of otter *Lutra lutra* and water vole *Arvicola amphibian* within 2km of the Site.

Field Survey

- 3.27 Habitats within the Site boundary are considered sub-optimal to support notable populations of amphibians, with only the broadleaved woodland providing opportunities for cover and foraging. However, habitats within the surrounding area contain suitable habitats for amphibians during both their aquatic and terrestrial phase. These habitats include watercourses and broadleaved woodland.
- 3.28 The Site itself offers limited to no opportunities for otter and water vole. However, off-Site habitats including Wealdstone Brook are suitable for otters and water vole.

- 3.29 No evidence of any other protected and notable faunal or floral species were recorded on Site at the time of the Field Survey and overall, given the type and extent of habitats present, it is considered unlikely that any such species would be present on Site.

4. Assessment

4.1 Those potential IEFs that may be adversely affected (based on the results of the PEA and the proposed Development information received to date) are listed in **Table 7** below. This table details the rationale for the inclusion of each potential IEF and also details the potential effect pathways and any requirement for further ecological assessments.

Table 7: Ecological Features Scoped In for Further Assessment

Feature	Category of Importance	Rationale	Potential Effect Pathway	Requirement for Further Assessment
Non-Statutory Designated Sites – Wealdstone Brook and Jubilee Line for Stanmore Junction to Queensbury	SBIGII and SBIGI	Wealdstone Brook is located immediately adjacent to the Site boundary. Jubilee Line for Stanmore Junction to Queensbury is located 0.05km to the east of the Site boundary	No direct impacts are anticipated as the SBIGII and SBIGI are off Site Indirect effects could result from an increase in nighttime lighting during construction and operation and pollution incidents during construction (at Wealdstone Brook only)	No. None anticipated based on current development proposals.
Bats- Foraging and Commuting	Hab Regs WCA, S41, LES, NRL, GBAP.	Habitats immediately adjacent to Site, namely Wealdstone Brook, is suitable commuting habitats for bats and connectivity to the wider local area.	Indirect effects as a result of an increase in nighttime lighting during construction and operation and commuting habitat fragmentation for the local bat population.	Yes. Nighttime Bat Walkover (NBW) and automated detector surveys.
Flora (including INNS)	WCA	Japanese knotweed is present on the Site within the non-native ornamental hedgerow	Risk of spreading the species into the wild.	Site should be subject to a formal survey by a specialist contractor to map the presence of the species and advise on its treatment and legal implications.

4.2 All other ecological features identified through the PEA have been scoped out of further assessment because

- The habitat or species population likely to be affected by the proposed Development is of insufficient size or diversity to be of ecological value; and/or
- There is no potential effect pathway between the Development and the features identified; and/or
- Contravention of the legislation relating to the feature is unlikely to occur.

4.3 The rationale for scoping out features is provided in **Table 8** below.

Table 8: Ecological Features Scoped out of the Assessment

Ecological Feature	Rationale
Statutory and non-statutory designated Sites	<p>No pathway of direct or indirect. Lee Valley Ramsar and SPA and Epping forest SAC are located more than 7km from the Site. The known ZOI for recreation pressure at Epping Forest is known to be 6.2km.</p> <p>No pathway of direct or indirect effect given distance from all other statutory and non-statutory sites (the closest is Wembley Park Sports Field SLI 0.29km away in an urban environment)</p> <p>No significant impacts anticipated from the proposed Development.</p>
On Site Habitats - All	<p>Habitat types on and immediately adjacent to the Site are both nationally and locally common.</p> <p>No significant impacts anticipated from the proposed Development.</p>
Bats - Roosting	<p>B1 present on Site is assessed to have a suitability rating of 'Negligible' for roosting bats. All trees present on Site had no potential for roosting bats.</p> <p>No significant impacts anticipated from the proposed Development.</p>
Breeding Birds	<p>Any population(s) likely to be of insufficient size or diversity to be of significant ecological value.</p> <p>No significant impacts anticipated from the proposed Development.</p>
Terrestrial Invertebrates	<p>Any population(s) likely to be of insufficient size or diversity to be of significant ecological value.</p> <p>No significant effects anticipated from the proposed Development.</p>
Reptiles	<p>On Site habitat offers limited suitability and is isolated from surrounding suitable habitats.</p> <p>No significant impacts anticipated from the proposed Development.</p>

5. Ecological Constraints and Opportunities

- 5.1 The PEA has identified several potential IEFs that are anticipated to be affected by the proposed Development (**Table 7**). As such, the proposed Development has the potential to result in significant ecological effects upon these features. It is therefore recommended that further survey effort is undertaken with regard to bats and INNS (**Table 7**), and that appropriate environmental mitigation measures are implemented in order to appropriately protect non-statutory designated sites and other faunal species (as detailed below). As required, this also includes ecological features that have been scoped out of the assessment (**Table 8**).
- 5.2 In addition, recommendations of ecological enhancement measures at this initial stage are also presented below that could be incorporated into the proposed Development to contribute to fulfilling policy requirements and meet biodiversity net gain in line with legislative and planning policy requirements.

Designated Sites

- 5.3 The non-statutory designated Wealdstone Brook SBIGII and Jubilee Line for Stanmore Junction to Queensbury SBIGI are present immediately adjacent to the Site boundary and 0.05km respectively. These non-statutory designated sites have the potential to be indirectly affected as a result of an increase in night lighting during construction and operation and pollution incidents during construction Wealdstone Brook only. No direct impacts are anticipated as the sites are off Site.
- 5.4 Consequently, appropriate environmental protection measures should be set out within a Construction Ecological Management Plan (CEMP) and a sensitive lighting scheme (in accordance with best practice guidelines¹⁶) implemented to minimise unnecessary light spill upon these sites.

Habitats

- 5.5 Other than Wealdstone Brook no other habitats present on or adjacent to the Site are considered to comprise IEFs. Due to the nature of the proposed Development, it is expected that all habitats except the woodland will be removed from the Site, however no significant effects are anticipated as a result of their loss.
- 5.6 Notwithstanding this, the proposed Development should seek to provide ecological enhancements at the Site in line with adopted local planning policies BP1 and BGI2. The following enhancement measures should be considered as part of the emerging scheme design:
- Incorporation of ground level planters, street trees, and climbers at ground level and on terraces, including linear habitat features;
 - Provision of biodiverse living roofs, proving a 'stepping stone' habitat for faunal species as well as foraging opportunities for bats and birds;
 - The provision of native plant species and species of benefit to biodiversity (such as pollen, nectar, seed and berry producing species) and be designed to provide a rich source of nectar for foraging bees and other invertebrates.
 - The provision of retained and enhanced woodland.
 - In line with best practice, it is also recommended that additional mitigation measures are adhered to during Site preparation and construction activities to minimise and negate adverse indirect impacts resulting in adverse effects on retained habitats present within the local area. These measures should be incorporated within a CEMP.

¹⁶Bats and Artificial Lighting in the UK' Guidance Note GN 08 / 23

Protected and Notable Fauna

Bats

- 5.7 The immediately adjacent Wealdstone Brook has been assessed to offer ‘**Low**’ suitability for flight paths and foraging habitats. In order to determine the usage of these habitats by foraging and commuting bats, it is recommended that night-time bat walkover (NBW) surveys and automated detector surveys (through the use of 3 static detectors) is undertaken at the Site in accordance with best practice guidelines (Collins, J. 2023). This should comprise a survey within each season i.e. Spring (April/May), Summer (June/July/August) and Autumn (September/October) in suitable weather conditions.
- 5.8 All other buildings and trees present on the Site have been assessed to be of ‘**Negligible**’ suitability for supporting roosting bats.
- 5.9 Enhancement of the Site for bats should be provided. The provision of the habitat enhancements as detailed above and the provision of roosting habitats in the form of bat boxes/tubes should look to be included within the emerging scheme design. The number and type of boxes would be informed through the results of those further surveys recommended above, as well as consultation between the project ecologist and project team.
- 5.10 In addition, a wildlife sensitive lighting strategy (in accordance with best practice guidelines¹⁷) should look to be adopted across the Site and in particular Wealdstone Brook to prevent any unnecessary spill on any future bat roosting, commuting and foraging habitat.

Breeding Birds

- 5.11 As a result of the Field Survey and ecological desk study breeding bird assemblage present on and adjacent to the Site is likely to be limited to bird species adapted to urban environments and as such no significant adverse effects are anticipated.
- 5.12 Notwithstanding the above, to ensure legal compliance, the removal of buildings and vegetation with the potential to support breeding birds should be undertaken outside of the breeding bird season (March to August inclusive). However, if works cannot be undertaken outside the breeding bird season an ecologist should inspect the buildings and planting at least 24 hours prior to any removal works being undertaken. If an occupied nest is detected, an appropriate buffer zone should be created around the nest, and clearance of this area delayed until the young have fledged.
- 5.13 It should also be noted that some species, such as pigeons, are capable of breeding all-year round. Although considered a pest species, whilst nesting all species of bird are protected under the Wildlife and Countryside Act 1981 (as amended). A suitable contractor should look to be appointed to develop a strategy to ensure all buildings on Site are free and stay free of nesting birds such as feral pigeon and gulls. Measures such as the use of anti-nesting devices including netting, spikes, bird scarers should be used to discourage birds from nesting on the buildings.
- 5.14 The proposed Development should provide bird boxes at part of the emerging scheme design to enhance opportunities on Site for nesting birds. Bird boxes could be integrated or mounted on the walls of the new buildings at least 3m above ground level and river walls and face east or west. The number and type of boxes would be informed through consultation between the project ecologist and project team and could include boxes for house sparrow, swift and black redstart.

¹⁷Bats and Artificial Lighting in the UK' Guidance Note GN 08 / 23

- 5.15 The use of native plant species as summarised above would provide additional foraging and nesting habitat for common species of bird at the Site.

Terrestrial Invertebrates

- 5.16 Although not assessed to be an IEF the Site could be enhanced for terrestrial invertebrates. The provision of pollen and nectar producing floral species within the proposed Development's landscape design (including living roofs) and insect boxes at ground level or on living roofs and/or banded and secured dead wood / log piles could be provided.,

Flora (Including INNS)

- 5.17 Japanese knotweed has been recorded on Site. Japanese knotweed is listed as a Non-Native Invasive Species under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).
- 5.18 Given the above, the Site should be subject to a formal survey by a specialist contractor to map the presence of the species and advise on its treatment and legal implications, once the details of the development and the project programme have been fixed.


6. Conclusions

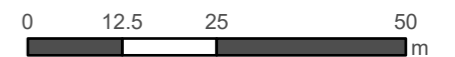
- 6.1 As a result of the PEA, ecological features within the Zol including, non-statutory designated sites, bats and INNS, have been assessed as being potential IEFs regarding any future development at the Site. Additional surveys for bats have been recommended.
- 6.2 To ensure legal compliance and that good practice measures are adopted during the construction stage of the Development, recommendations have been made within this report with regards to the design of the Development and requirement for further assessment.
- 6.3 Upon scheme fix and based on the results of the further assessments recommended within this report, the mitigation, compensation (if necessary) and enhancement measures will need to be confirmed / finalised in documentation suitable for planning submission, likely an EclA.
- 6.4 If there is a significant period (most LPAs consider this period to be 18 months¹⁸) between this PEA and the Development commencing, the ecological value of the Site may change, and the Site should therefore be subject to an update survey.

¹⁸ CIEEM (April 2019) 'Advice Note: On the Lifespan of Ecological Reports & Surveys'. CIEEM, Hampshire.

Figures

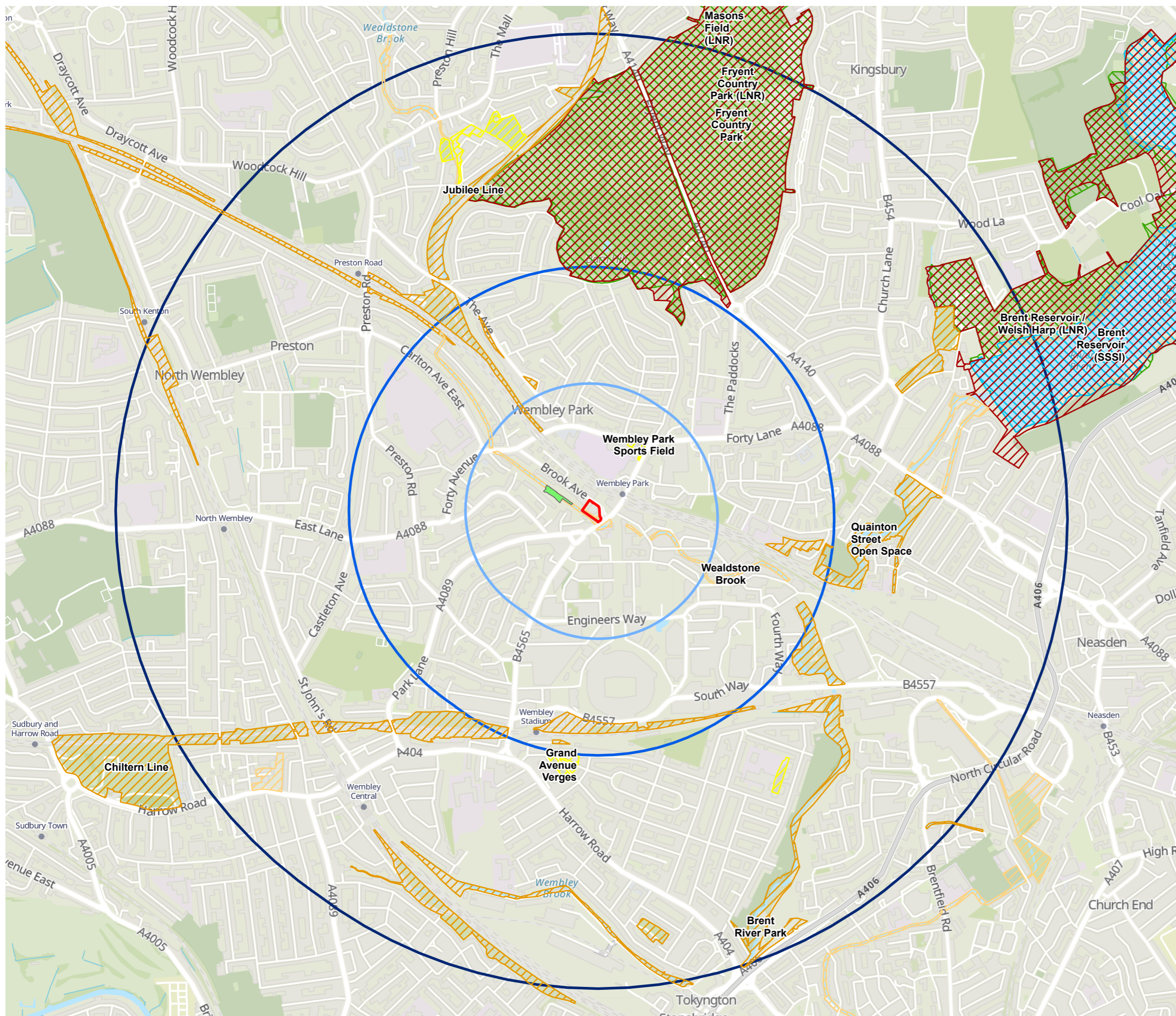
- Figure 1: Site Location (REF:21431101-WAT-XX-XX-GS-N-750001)
- Figure 2: Desk Study Results (REF:21431101-WAT-XX-XX-GS-N-750002)
- Figure 3: Habitat Baseline Plan (REF:21431101-WAT-XX-XX-GS-N-750003)

 Site Boundary



Project Details	WIE21431-101: Wembley Park
Figure Title	Figure 1: Site Location
Figure Ref	21431101-WAT-XX-XX-GS-N-750001
Date	June 2025
File Location	WIE21431-101\GIS\21431101-WAT-XX-XX-GS-N-75

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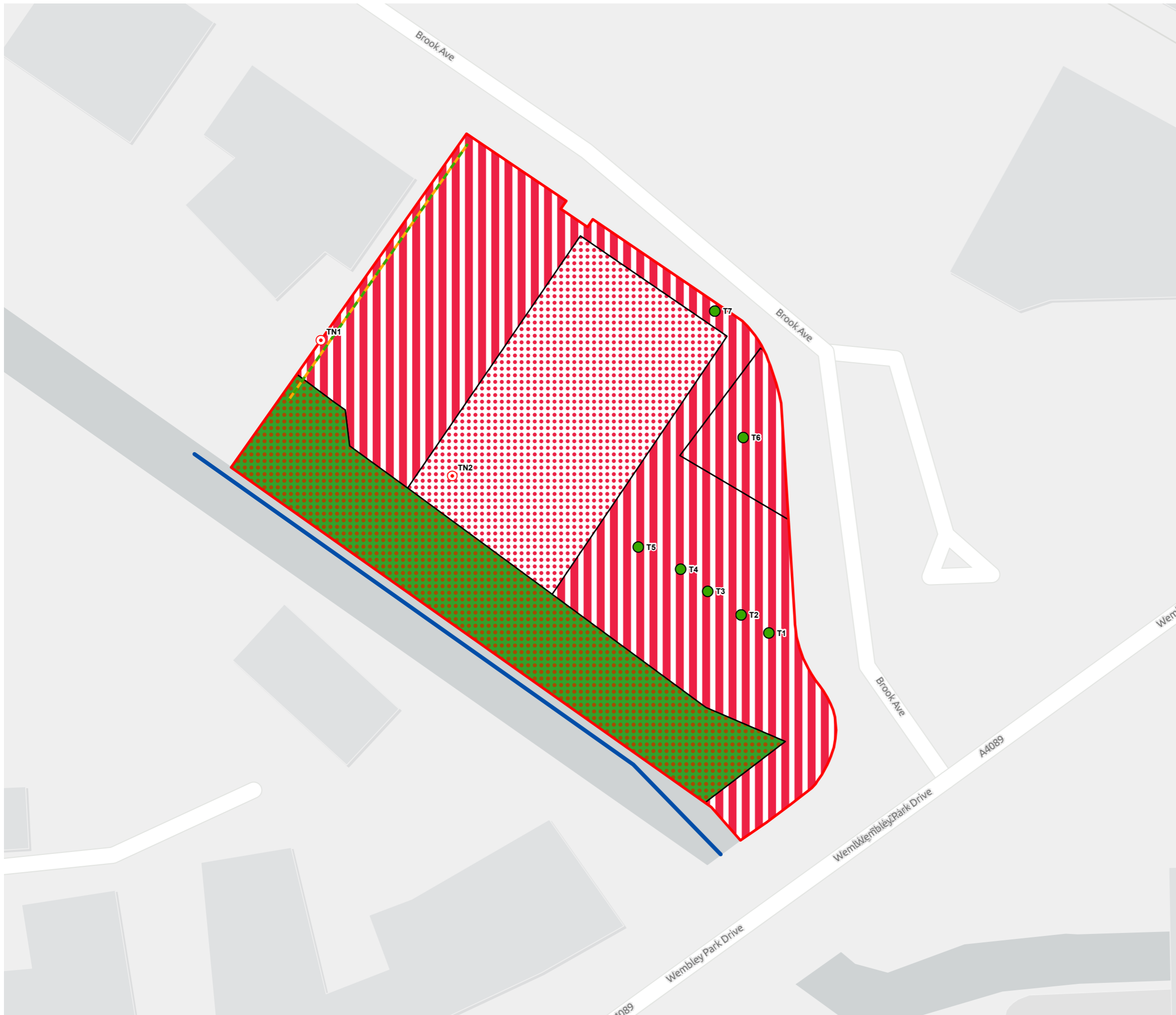


- Site Boundary
- 2km Search Area
- 1km Search Area
- 500m Search Area
- Sites of Importance for Natural Conservation**
- Metropolitan Importance
- Borough Importance Grade 1
- Borough Importance Grade 2
- Local Importance
- Priority Habitats (HoPIs)**
- Deciduous woodland
- Statutory Sites**
- Sites of Special Scientific Interest (SSSIs)
- Local Nature Reserves (LNRs)

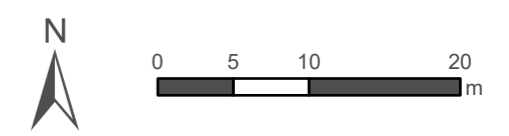


Project Details	WIE21431-101: Wembley Park
Figure Title	Figure 2: Desk Study Results
Figure Ref	21431101-WAT-XX-XX-GS-N-750002
Date	June 2025
File Location	WIE21431-101\GIS\21431101-WAT-XX-XX-GS-N-75

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- Site Boundary
- u1b - Developed land; sealed surface
- u1b5 - Buildings
- w1g - Other broadleaved woodland
- h2b - Non-native and ornamental hedgerow
- r2b - Other rivers and streams
- Tree
- Target Note



Project Details	WIE21431-101: Wembley Park
Figure Title	Figure 3: Baseline Habitats
Figure Ref	21431101-WAT-XX-XX-GS-N-750003
Date	July 2025
File Location	WIE21431-1019_GIS\21431101-WAT-XX-XX-GS-N-75

Appendices

A. Summary of Relevant Planning Policy and Wildlife Legislation Appendices

National Planning Policy

National Planning Policy Framework, 2025

The National Planning Policy Framework (NPPF) was published in 2012 and last updated in February 2025¹⁹. Section 15 (outlined below) of the NPPF, 'Conserving and Enhancing the Natural Environment', is of relevance to this report. No significant changes to Section 15 are noted between the 2021²⁰ and 2025 update. The Government Circular 06/2005²¹ - Biodiversity and Geological Conservation: Statutory Obligations and Their Impact within the Planning System, remains valid and is still referenced within the NPPF.

The NPPF encourages the planning system to contribute to and enhance the natural and local environment. This should be achieved by:

- "Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;
- preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate".

The NPPF also stipulates that Local Planning Authorities (LPAs), when determining planning applications, should apply the following principles:

- "If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

¹⁹ Department for Levelling Up, Housing and Communities (2025): National Planning Policy Framework.

²⁰ Ministry of Housing, Communities and Local Government. (2021): National Planning Policy Framework

²¹ Department of Communities and Local Government (2005): Circular 06/05: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System.

- development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
- development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
- development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.”

National Planning Practice Guidance, 2025

The Government’s National Planning Practice Guidance (NPPG)²² is intended to provide guidance to local planning authorities and developers on the implementation of the planning policies set out within the NPPF. The guidance of most relevance to ecology and biodiversity is the Natural Environment Chapter (published 2019), which explains key issues in implementing policy to protect biodiversity, including local requirements.

Regional Planning Policy

The London Plan 2021: The Spatial Development Strategy for Greater London

The New London Plan 2021²³ sets out the overall strategic plan, setting out a framework for development over the next 20 to 25 years and includes several policies relating to ecology. Key to the London Plan is Policy G6 ‘Biodiversity and Access to Nature’ which sets out the Mayor’s policy in relation to biodiversity and access to nature. In outline, it includes the following:

- *“Sites of Importance for Nature Conservation (SINCs) should be protected.*
- *Boroughs in developing Development Plans, should:*
 1. *Use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks*
 2. *identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them*
 3. *support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans*
 4. *seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context*
 5. *ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.*
- Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:
 1. *avoid damaging the significant ecological features of the site*
 2. *minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site*

²² Department for Communities and Local Government (2025): National Planning Practice Guidance. DCLG, London.

²³ Greater London Authority (2021): The London Plan: The Spatial Development Strategy for Greater London

3. *deliver off-site compensation of better biodiversity value.*

- Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
- Proposals which reduce deficiencies in access to nature should be considered positively.”

The Mayor’s Biodiversity Strategy: Connecting with London’s Nature, 2002

The Mayor’s Biodiversity Strategy²⁴ complements the adopted London Plan. It sets out how London’s biodiversity can be protected. Relevant policies within the Biodiversity Strategy include:

- Policy 1: *“The Mayor will work with partners to protect, manage and enhance London’s biodiversity”;*
- Policy 3: *“The Mayor will encourage and promote the management, enhancement and creation of green space for biodiversity, and promote public access and appreciation of nature”;*
- Policy 5: *“The Mayor will seek to ensure that opportunities are taken to green the built environment within development proposals and to use open spaces in ecologically sensitive ways. This is particularly important in areas deficient in open spaces and in areas of regeneration”;* and
- Policy 13: *“The Mayor is committed to increasing the funding for biodiversity projects in London and wishes to ensure that major new development projects include provision for biodiversity”.*

Mayor of London’s Supplementary Planning Guides: Sustainable Design and Construction, 2014

The Mayor republished the Supplementary Planning Guidance (SPG) for Sustainable Design and Construction in April 2014²⁵. The SPG refers to nature conservation and biodiversity and suggests that to conserve and enhance the natural environment and biodiversity, there should be no net loss in the quality and quantity of biodiversity across a site. The SPG also states that developments should be designed so the biodiversity is enhanced and connectivity between patches of urban habitat is increased. The design of the development should reduce indirect adverse impacts of the development on species, habitats and landscapes.

Local Planning Policy

Brent Local Plan 2019-2041

The Brent Local Plan sets out the borough’s vision for growth, housing, infrastructure, environment, and sustainability, and forms the basis for assessing all planning applications. Relevant Policies include:

Policy BGI1 Green and blue infrastructure: For all developments, open spaces must be appropriately designed to be accessible, safe, usable, and well-integrated into the development site. They should enhance biodiversity and, where adjacent to existing green or blue infrastructure networks, be connected to these natural assets. Additionally, all open spaces must include a suitable long-term management plan. Developments located next to the Blue Ribbon Network must improve access to the waterway, enhance its setting, and provide a landscaped set-back, which may include public open space. All developments must achieve a net gain in biodiversity and avoid negatively impacting the area's biodiversity.

²⁴ Mayor of London (2002): The Mayor’s Biodiversity Strategy: Connecting with London’s Nature

²⁵ Greater London Authority (April 2014): Sustainable Design and Construction Supplementary Planning Guidance, London.

Policy BGI2 on Trees and Woodlands: Any development affecting existing trees on or adjacent to a site must be supported by a BS5837 (or equivalent) tree survey. Major developments must provide for the retention or replacement of trees on-site, ensuring that any lost canopy cover is replaced with new planting of equivalent canopy area or through a financial contribution for off-site planting. Minor developments resulting in tree loss must include appropriate on-site replacements. All retained or newly planted trees must comply with BS5837 standards, and any agreed tree works must follow BS3998:2010 guidelines.

Biodiversity Action Plans

UK Biodiversity Framework 2024

The UK Biodiversity Framework²⁶ (UKBF) was published in May 2024 and supersedes the previous Framework (the UK Post-2010 UK Biodiversity Framework), which was developed following agreement of the Convention on Biological Diversity (CBD) Strategic Plan for Biodiversity 2011-2020 and the 'Aichi targets'.

The UKBF has been developed in response to the Kunming-Montreal Global Biodiversity Framework (GBF), agreed at the Fifteenth Conference of the Parties of the CBD in December 2022. The UKBF has been produced through the Four Countries' Biodiversity Group which is the lead governance body for the UKBF, and which includes representatives from DAERA, Defra, Scottish Government, and Welsh Government, with JNCC providing an independent secretariat role.

Through the UKBF the four countries will agree on activities where joint action between the four countries is required to implement the GBF.

London Environment Strategy

The LES sets out how London's biodiversity can be protected and enhanced and contains a list of Priority Habitats and Species within the city. Priority species (SAPs) related to the Site are listed below:

- House sparrow (SAP);
- Common pipistrelle *Pipistrellus pipistrellus* (SAP); and
- Soprano pipistrelle (SAP).

Guidance

Biodiversity 2020: A strategy for England's wildlife and ecosystem services

In October 2010, over 190 countries signed an historic global agreement in Nagoya, Japan to take urgent and effective action to halt the alarming global declines in biodiversity. This agreement recognised just how important it is to look after the natural world. It established a new global vision for biodiversity, including a set of strategic goals and targets to drive action. England's response to this agreement was the publication of '*Biodiversity 2020: A strategy for England's wildlife and ecosystem services*'²⁷. The mission for this strategy is:

"to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people."

²⁶ JNCC on behalf of the Four Countries' Biodiversity Group (4CBG). (2024). UK Biodiversity Framework. JNCC, Peterborough.

²⁷ Defra. (2011) *Biodiversity 2020: A strategy for England's wildlife and ecosystem services*.

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BS 42020: 2013 Biodiversity: Code of Practice for Planning and Development

The UK commitment to halt overall loss of biodiversity by 2020 in line with the European Biodiversity Strategy and UN Aichi targets²⁸, is passed down to local authorities to implement, mainly through planning policy. To assist organizations affected by these commitments, The British Standard Institute has published BS 42020 which offers a coherent methodology for biodiversity management.

This British Standard sets out to assist those concerned with ecological issues as they arise through the planning process in matters relating to permitted development and activities involved in the management of land outside the scope of land use planning, which could have site-specific ecological implications.

The standard has been produced with input from a number of organisations including the Chartered Institute of Ecology and Environmental Management (CIEEM) and the Association of Local Government Ecologists (ALGE) and provides:

- guidance on how to produce clear and concise ecological information to accompany planning applications;
- recommendations on professional ethics, conduct, competence and judgement to give confidence that proposals for biodiversity conservation, and consequent decisions/actions taken, are sound and appropriate; and
- direction on effective decision-making in biodiversity management a framework to demonstrate how biodiversity has been managed during the development process to minimise impact.

Legislation

Specific habitats and species receive legal protection in England under various pieces of legislation, including:

- The Conservation of Habitats and Species Regulations 2017 (as amended)²⁹;
- The Wildlife and Countryside Act 1981 (as amended) (WCA)³⁰;
- The Countryside and Rights of Way (CRoW) Act 2000³¹;
- The Natural Environment and Rural Communities Act 2006³²; and
- The Protection of Badgers Act (1992).

Further details of legislation in respect of legally protected and notable flora and fauna of relevance to the Site are provided below.

Bats

All bat species in England are protected by The Conservation of Habitats and Species Regulations 2017 (as amended) and by the WCA 1981 (as amended). Taken together, it is an offence to:

- deliberately kill, injure or capture a bat;
- deliberately disturb bats in such a way as to be likely to significantly affect:
 - (i) the ability of any significant group of bats to survive, breed, or rear / nurture their young; or

²⁸ <https://www.cbd.int/sp/targets/>

²⁹ HMSO (2019) 'The Conservation of Habitats and Species Regulations 2017 (as amended)'

³⁰ HMSO (1981) 'Wildlife and Countryside Act 1981 (as amended)'

³¹ HMSO (2000) 'The Countryside and Rights of Way (CRoW) Act'

³² ODPM (2006) 'Natural Environment and Rural Communities Act (2006)'

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(ii) the local distribution of that species;

- damage or destroy any breeding or resting place used by bats; or
- intentionally or recklessly obstruct access to any place used by bats for shelter or protection.

Birds

The level of protection afforded to birds under the law varies from species to species. A few game and pest species may lawfully be hunted and killed, usually under licence, whilst the rarest species are listed on Schedule 1 of the WCA 1981 (as amended) and are protected by special penalties for offences.

Statutory protection is given to all nesting birds in the UK under the WCA 1981 (as amended), which makes it an offence to intentionally kill, injure or take any wild bird, take, damage or destroy its nest whilst in use or being built, or take or destroy its eggs. In addition to this, for species listed on Schedule 1 of the WCA 1981 (as amended), it is an offence to intentionally or recklessly disturb birds while they are nest building, or at or near a nest with eggs or young, or to disturb the dependent young of such a bird.

A number of Invasive Non-Native Species (INNS) of plant are listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). This makes it an offence to plant or otherwise cause any listed species to grow in the wild. In addition, any soil or plant material containing these species is classed as controlled waste under the Environmental Protection Act 1990.

B. Photographs

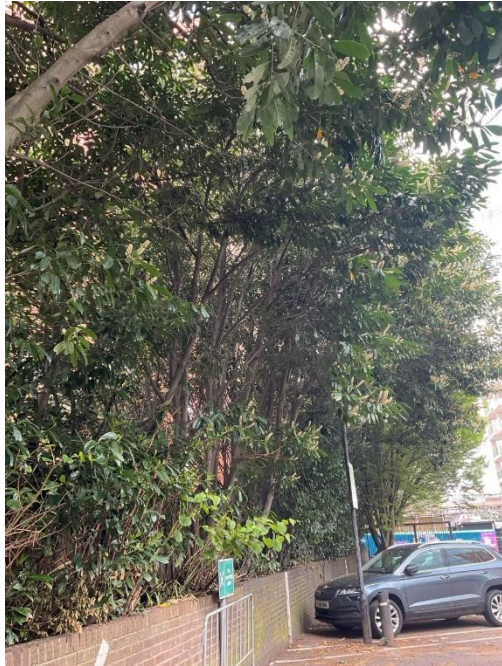


Plate 1: H1 non-native ornamental hedgerow present on the eastern border of the Site, looking east.



Plate 2: TN2 - Stand of Japanese knotweed present in H1

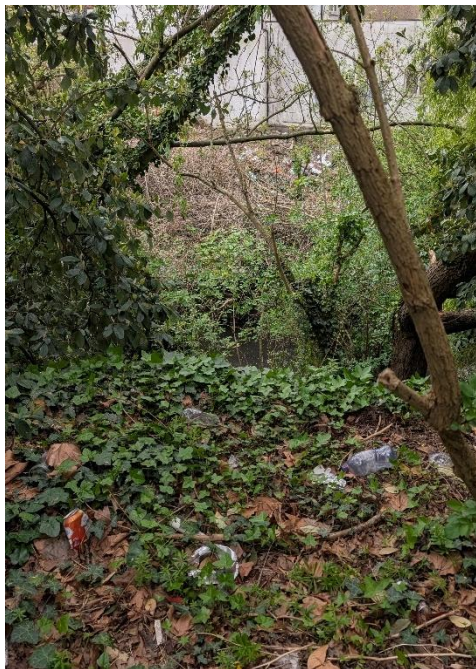


Plate 3: Wealdstone Brook directly adjacent to the south of the Site, photo taken from edge of broadleaved woodland looking south



Plate 4: Car park associated with the hotel, looking west.

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Plate 5: Car park and road leading to the hotel, looking south east

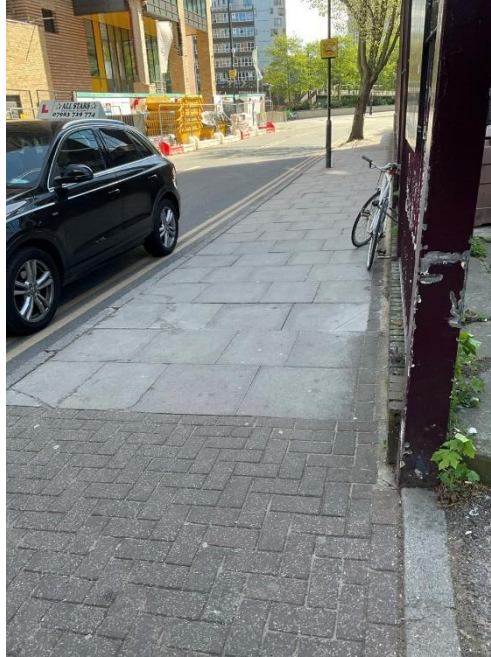


Plate 6: Pavement adjacent to road, at the edge of the Site, looking north



Plate 7: Paved seating area on Site, looking east



Plate 8: 6-storey hotel building with red and concrete, looking north-east

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Plate 9: Glass cladding on building, looking north-west



Plate 10: TN2 - bird netting present on building



Plate 11: Broadleaved woodland, looking south west



Plate 12: Broadleaved woodland, looking south east

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Plate 13: T1, urban tree present in hardstanding.



Plate 14: T2, urban tree present in hardstanding.



Plate 15: T3, urban tree present in hardstanding.



Plate 16: T4, urban tree present in hardstanding.

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Plate 17: T5, urban tree present in hardstanding.



Plate 18: T6, urban tree present in hardstanding.



Plate 19: T7, urban tree present in hardstanding.



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C. Protected Species Summary from GiGL

Species	Category of Importance*	Number of Records	Date of most recent Record	Location of records relevant to the study area (km)
Amphibians				
Common Toad <i>Bufo bufo</i>	S41, LPS	70	2018	0.93 N
Common Frog <i>Rana temporaria</i>	S41, LPS	645	2019	0.46 SW (1999)
Reptiles				
Slow-worm <i>Snguis fragilis</i>	WCA, S41, LPS	15	2021	0.91 S
Grass Snake <i>Natrix helvetica</i>	WCA, S41, LPS	1	2002	1.84 NE
Common Lizard <i>Zootoca vivipara</i>	WCA, S41, LPS	2	2002	1.68 NW
Birds				
Lesser Redpoll <i>Acanthis cabaret</i>	S41, LPS	7	2020	1.49 N
Common Sandpiper <i>Actitis hypoleucos</i>	LPS	10	1987	0.29 N
Skylark <i>Alauda arvensis</i>	S41, LPS, Red	6	2020	0.29 N
Kingfisher <i>Alcedo atthis</i>	Birds Dir, WCA, LPS	8	2021	0.29 N
Swift <i>Apus apus</i>	LPS, Red	45	2023	0.52 NW
Short-eared Owl <i>Asio flammeus</i>	Birds Dir	1	2018	1.19 N
Greenfinch <i>Chloris chloris</i>	Red	33	2021	0.29 N (1987)
Lesser Whitethroat <i>Curruca curruca</i>	LPS	16	2021	1.19 N
House Martin <i>Delichon urbicum</i>	LPS, Red	5	2020	0.29 N
Lesser Spotted Woodpecker <i>Dryobates minor</i>	LPS, Red	3	2011	0.29 N
Little Egret <i>Egretta garzetta</i>	Birds Dir	10	2021	1.49 N
Reed Bunting <i>Emberiza schoeniclus</i>	S41	3	2022	1.49 N
Gyr Falcon <i>Falco rusticolus</i>	Birds Dir, WCA	1	2014	1.44 SW

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Species	Category of Importance*	Number of Records	Date of most recent Record	Location of records relevant to the study area (km)
Brambling <i>Fringilla montifringilla</i>	WCA	3	2021	1.49 N
Herring Gull <i>Larus argentatus</i>	Red	45	2021	0.1 E (2019)
Lesser Black-backed Gull <i>Larus fuscus</i>	LPS	12	2016	0.29 N (1987)
Baltic Gull <i>Larus fuscus fuscus</i>	LPS	41	2020	0.52 NW
Linnet <i>Linaria cannabina</i>	LPS, Red	11	2021	0.29 N (1987)
Crossbill <i>Loxia curvirostra</i>	WCA	1	2020	1.49 N
Gadwall <i>Mareca strepera</i>	LPS	15	2020	0.29 N (1987)
Red Kite <i>Milvus milvus</i>	Birds Dir, WCA	9	2021	0.12 NE
Grey Wagtail <i>Motacilla cinerea</i>	LPS	20	2022	0.12 NE
Yellow Wagtail <i>Motacilla flava</i>	LPS, Red	9	2020	0.29 N(1987)
Spotted Flycatcher <i>Muscicapa striata</i>	S41, LPS, Red	5	2020	0.29 N(1987)
House Sparrow <i>Passer domesticus</i>	S41, LPS, Red	118	2020	0.69 NW (2002)
Honey-buzzard <i>Pernis apivorus</i>	Birds Dir, WCA	1	2017	1.49 N
Dunnock <i>Prunella modularis</i>	LPS	87	2022	0.12 NE
Woodcock <i>Scolopax rusticola</i>	LPS, Red	3	2019	0.12 NE (1986)
Common Tern <i>Sterna hirundo</i>	Birds Dir	24	2018	1.19 N
Tawny Owl <i>Strix aluco</i>	LPS	9	2022	0.29 N (1987)
Starling <i>Sturnus vulgaris</i>	LPS, Red	113	2022	0.12 NE (2021)
Redwing <i>Turdus iliacus</i>	WCA	113	2022	1.49 N (2021)
Song Thrush <i>Turdus philomelos</i>	LPS	176	2022	0.53 S (2015)

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Species	Category of Importance*	Number of Records	Date of most recent Record	Location of records relevant to the study area (km)
Fieldfare <i>Turdus pilaris</i>	WCA, Red	58	2021	0.29 N (1987)
Ring Ouzel <i>Turdus torquatus</i>	S41, LPS, Red	3	2016	0.29 N (1987)
Mistle Thrush <i>Turdus viscivorus</i>	LPS, Red	55	2021	0.29 N (1987)
Goshawk <i>Accipiter gentilis</i>	WCA	5	2017	Within 2km
Hawfinch <i>Coccothraustes coccothraustes</i>	S41, LPS, Red	1	2016	Within 2km
Lesser Spotted Woodpecker <i>Dryobates minor</i>	LPS, Red	1	2013	Within 2km
Little Egret <i>Egretta garzetta</i>	Birds Dir	1	2020	Within 2km
Peregrine <i>Falco peregrinus</i>	Birds Dir, WCA, LPS	9	2017	Within 2km
Hobby <i>Falco subbuteo</i>	WCA	13	2020	Within 2km
Woodlark <i>Lullula arborea</i>	Birds Dir, WCA, S41, LPS	1	2017	Within 2km
Red Kite <i>Milvus milvus</i>	Birds Dir, WCA	20	2023	Within 2km
Black Redstart <i>Phoenicurus ochruros</i>	WCA, LPS	1	2017	Within 2km
Terrestrial Mammals				
European Hedgehog <i>Erinaceus europaeus</i>	S41, LPS	35	2023	0.71 W (1999)
Bats				
Serotine <i>Eptesicus serotinus</i>	Habs Dir, Habs Regs, WCA, LPS	4	2022	0.10 E (2007)
Myotis Bat Species <i>Myotis</i>	Habs Dir, Habs Regs, WCA, S41, LPS	2	2016	1.42 NE
Daubenton's Bat <i>Myotis daubentonii</i>	Habs Dir, Habs Regs, WCA, LPS	3	2014	1.18 E
Leisler's Bat <i>Nyctalus leisleri</i>	Habs Dir, Habs Regs, WCA, LPS	5	2022	0.10 E (2007)
Noctule Bat <i>Nyctalus noctula</i>	Habs Dir, Habs Regs, WCA, S41, LPS	4	2022	0.10 E (2007)
Pipistrelle Bat Species <i>Pipistrellus</i>	Habs Dir, Habs Regs, WCA, S41, LPS	3	2022	1.51 NW (2020)

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Species	Category of Importance*	Number of Records	Date of most recent Record	Location of records relevant to the study area (km)
Nathusius's Pipistrelle <i>Pipistrellus nathusii</i>	Habs Dir, Habs Regs, WCA, LPS	4	2022	0.10 E (2007)
Pipistrelle <i>Pipistrellus pipistrellus</i>	Habs Dir, Habs Regs, WCA, LPS	16	2022	0.10 E (2007)
Soprano Pipistrelle <i>Pipistrellus pygmaeus</i>	Habs Dir, Habs Regs, WCA, S41, LPS	9	2022	0.10 E (2007)
Bats <i>Vespertilionidae</i>	Habs Dir, Habs Regs, WCA, S41, LPS	25	2020	0.75 S (2015)
Invertebrates				
Stag Beetle <i>Lucanus cervus</i>	Habs Dir, S41, LPS	9	2023	0.12 NE (2017)
Small Heath <i>Coenonympha pamphilus</i>	S41, LPS	74	2021	0.77 N (1982)
Small Copper <i>Lycaena phlaeas</i>	LPS	109	2023	0.77 N
Large Skipper <i>Ochlodes sylvanus</i>	LPS	770	2023	0.77 N (1982)
White-letter Hairstreak <i>Satyrrium w-album</i>	S41, LPS	1	2017	1.7 E
Brown Hairstreak <i>Thecla betulae</i>	S41, LPS	45	2024	1.28 NE
Essex Skipper <i>Thymelicus lineola</i>	LPS	48	2023	0.77 N (1982)
Small Skipper <i>Thymelicus sylvestris</i>	LPS	440	2023	0.77 N (1982)
Grey Dagger <i>Acronicta psi</i>	S41	32	2009	1.64 E (2000)
Knot Grass <i>Acronicta rumicis</i>	S41	79	2011	1.18 NE
Beaded Chestnut <i>Agrochola lychnidis</i>	S41	3	2006	1.99 SW
Green-brindled Crescent <i>Allophytes oxyacanthae</i>	S41	2	2011	1.18 NE
Ear Moth <i>Amphipoea oculea</i>	S41	6	2008	2.04 SW
Mouse Moth <i>Amphipyra tragopoginis</i>	S41	5	2008	1.64 E (2000)
Large Nutmeg <i>Apamea anceps</i>	S41	1	2010	1.99 SW
Dusky Brocade	S41	13	2010	1.99 SW

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Species	Category of Importance*	Number of Records	Date of most recent Record	Location of records relevant to the study area (km)
<i>Apamea remissa</i>				
Centre-barred Sallow <i>Atethmia centrago</i>	S41	22	2011	1.18 NE
Mottled Rustic <i>Caradrina morpheus</i>	S41	11	2010	1.64 E (2000)
Dusky-lemon Sallow <i>Cirrhia gilvago</i>	S41, LPS	1	2007	1.99 SW
Sallow <i>Cirrhia icteritia</i>	S41, LPS	4	2011	1.18 NE
Small Square-spot <i>Diarsia rubi</i>	S41	38	2011	1.18 NE
Figure of Eight <i>Diloba caeruleocephala</i>	S41, LPS	2	2008	2.04 SW
Small Phoenix <i>Ecliptopera silaceata</i>	S41	3	2011	1.18 NE
Dusky Thorn <i>Ennomos fuscantaria</i>	S41	9	2009	1.59 N (2002)
August Thorn <i>Ennomos quercinaria</i>	S41, LPS	4	2006	1.99 SW
Autumnal Rustic <i>Eugnorisma glareosa</i>	S41, LPS	6	2009	1.18 NE
Spinach <i>Eulithis mellinata</i>	S41	2	2009	1.99 SW
Jersey Tiger <i>Euplagia quadripunctaria</i>	Habs Dir	2	2022	0.59 E (2017)
Double Dart <i>Graphiphora augur</i>	S41, LPS	1	2009	1.99 SW
Small Emerald <i>Hemistola chrysoprasaria</i>	S41, LPS	1	2007	2.04 SW
Rustic <i>Hoplodrina blanda</i>	S41	99	2010	1.64 E (2000)
Shoulder-striped Wainscot <i>Leucania comma</i>	S41	3	2006	1.64 E (2000)
Rosy Minor <i>Litologia literosa</i>	S41, LPS	11	2010	1.99 SW
Brindled Beauty <i>Lycia hirtaria</i>	S41	45	2009	1.64 E (2000)
V-moth <i>Macaria wauaria</i>	S41, LPS	1	2009	1.18 NE
Lackey	S41	9	2008	1.64 E (2000)

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Species	Category of Importance*	Number of Records	Date of most recent Record	Location of records relevant to the study area (km)
<i>Malacosoma neustria</i>				
Dot Moth <i>Melanchnra persicariae</i>	S41	4	2010	1.64 E (2000)
Dark Brocade <i>Mniotype adusta</i>	S41, LPS	6	2008	2.04 SW
Powered Quaker <i>Orthosia gracilis</i>	S41	9	2009	2.0 SW
Dark Spinach <i>Pelurga comitata</i>	S41	1	2008	2.0 SW
Large Wainscot <i>Rhizedra lutosa</i>	S41	1	2007	2.0 SW
Mullein Wave <i>Scopula marginepunctata</i>	S41	74	2011	1.18 NE
Shaded Broad-bar <i>Scotopteryx chenopodiata</i>	S41	8	2011	1.18 NE
White Ermine <i>Spilosoma lubricipeda</i>	S41	72	2010	1.64 E (2000)
Buff Ermine <i>Spilosoma lutea</i>	S41	14	2010	1.64 E (2000)
Hedge Rustic <i>Tholera cespitis</i>	S41, LPS	1	2009	1.18 NE
Blood-vein <i>Timandra comae</i>	S41	3	2008	1.64 E (2000)
Cinnabar <i>Tyria jacobaeae</i>	S41	27	2010	1.06 E (2005)
Oak Hook-tip <i>Watsonalla binaria</i>	S41	5	2007	1.59 N (2003)
INNS				
Water Fern <i>Azolla filiculoides</i>		2	2005	1.11 SW
Tree-of-heaven <i>Ailanthus altissima</i>		2	2020	1.11 SE
Butterfly-bush <i>Buddleja davidii</i>		59	2022	0.97 NW
A Flowering Plant <i>Cotoneaster</i>		32	2023	0.97 NW
Tree Cotoneaster <i>Cotoneaster frigidus</i>		7	2022	1.35 S
New Zealand Pigmyweed <i>Crassula helmsii</i>		6	2020	1.1 N

Appendices

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Species	Category of Importance*	Number of Records	Date of most recent Record	Location of records relevant to the study area (km)
Nuttall's Waterweed <i>Elodea nuttallii</i>		1	2005	1.08 SW
Japanese Knotweed <i>Fallopia japonica</i>		531	2022	0.96 SE
Goat's-rue <i>Galega officinalis</i>		722	2021	1.0 E
Gallant Soldier <i>Galinsoga parviflora</i>		1	2005	1.03 SE
Shaggy Soldier <i>Galinsoga quadriradiata</i>		711	2020	1.13 NE
Giant Hogweed <i>Heracleum mantegazzianum</i>		35	2019	0.94 E
Spanish Bluebell <i>Hyacinthoides hispanica</i>		710	2015	1.13 NE
Highclere Holly <i>Ilex aquifolium x perado = I. x altaclerensis</i>		1	2005	1.67 N
Himalayan Balsam <i>Impatiens glandulifera</i>		28	2019	1.06 SE
Parrot's-feather <i>Myriophyllum aquaticum</i>		5	2020	1.12 SW
Green Alkanet <i>Pentaglottis sempervirens</i>		5	2022	1.00 NW
Cherry Laurel <i>Prunus laurocerasus</i>		13	2023	1.07 N
Turkey Oak <i>Quercus cerris</i>		6	2023	1.00 NW
Evergreen Oak <i>Quercus ilex</i>		5	2023	1.59 N
False-acacia <i>Robinia pseudoacacia</i>		53	2023	1.01 SW
Snowberry <i>Symphoricarpos albus</i>		19	2022	1.01 NW

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