



7-8 WATKIN ROAD, WEMBLEY ENVIRONMENTAL IMPACT ASSESSMENT

SCREENING REQUEST

DECEMBER 2024

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APPENDICES

Appendix 1 – Site Location Plan (March, 2024)

Appendix 2 – Sensitive Areas Definition



1. INTRODUCTION AND PURPOSE

- 1.1 The report has been prepared by a Chartered Environmentalist (CEnv) and Chartered Town Planner (MRTPI) at Nimbus Environmental Consulting Ltd on behalf of SevenCapital (hereafter 'the Applicant').
- 1.2 The report is submitted in support of a request made under Regulation 6 of the Town and County Planning (Environmental Impact Assessment) Regulations 2017 (as amended)¹ (hereafter 'EIA Regulations'), for an Environmental Impact Assessment (EIA) Screening Opinion for the proposed redevelopment of 7 and 8 Watkin Road, Wembley, HA9 ONL within the London Borough of Brent (hereafter 'LBB') (hereafter 'the Site'). The redevelopment of the Site would provide up to 360 student accommodation bed spaces and provision of up to 900 square metres (sqm) commercial floorspace (to include reprovision of existing commercial floorspace), with ancillary facilities, cycle parking and landscaping. The Applicant will be seeking full planning permission for the proposals, as described fully in Section 3, and hereafter referred to as the 'Proposed Development'.
- 1.3 The purpose of this EIA Screening Report is to provide the information required to allow LBB to provide an EIA Screening Opinion. In doing so, this report identifies the potential environmental effects associated with the demolition of existing buildings and construction and operation of the Proposed Development and evaluates whether any effects identified are likely to be significant such as to trigger the need for EIA.
- 1.4 This Screening Report has been prepared in accordance with the EIA Regulations and provides details of the Proposed Development, including its location, characteristics, and potential impacts. This report comprises the following:
 - **Section 2:** Sets out the legal and policy context and provides details of the screening process as it applies to the Proposed Development;
 - Section 3: Describes the Site and surrounding context, and provides details of the Proposed Development;
 - Section 4: Considers the likely nature and character of potential environmental effects that the Proposed Development will give rise to; and
 - Section 5: Provides a conclusion and table of proposed mitigation measures.
- 1.5 For the reasons set out within this EIA Screening Report, it is considered that whilst the Proposed Development does fall within 'Schedule 2' of the EIA Regulations, it is a development which is unlikely to give rise to significant effects on the environment in itself or cumulatively, and therefore does not constitute 'EIA development'.

¹ HMSO, (2017). *The Town and Country Planning (Environmental Impact Assessment) Regulations 2017.* SI 2017/571. The Stationary Office.



2.0 LEGAL AND POLICY CONTEXT

Environmental Impact Assessment Regulations 2017 (As Amended)

- 2.1 The EIA Regulations is the key legislation relating to the requirement to consider the likely environmental effects of developments in England. The EIA Regulations provide screening criteria and thresholds at which certain types of developments should be screened, to determine whether a project is 'EIA Development'.
- 2.2 Regulation 2 of the EIA Regulations define 'EIA Development' as that which either falls under Schedule 1, where EIA is mandatory, or under Schedule 2, where only development likely to have significant environmental effects due to its nature, size or location should be considered to be 'EIA Development.'
- 2.3 When a development lies within a 'sensitive area', such as a Special Site of Scientific Interest (SSSI) or European designated site, (definition included in **Appendix 1**) or meets/ exceeds the respective thresholds set out within Schedule 2, the development needs to be screened to determine whether significant environmental effects are likely and hence whether an EIA is required.

Schedule 1

2.4 As above, EIA is mandatory for projects listed in Schedule 1 of the EIA Regulations. The Proposed Development does not fall under any of the definitions within Schedule 1 and will therefore not require an EIA under Schedule 1.

Schedule 2

- It is considered, however, that the Proposed Development falls within Schedule 2 under 10(b)
 'Urban Development Projects' as listed in Column 1 of the EIA Regulations. The EIA Regulations state that EIA may be required if the following thresholds are exceeded:
 - The development includes more than 1 hectare (ha) of urban development which is not dwelling house development; or
 - The development includes more than 150 dwellings; or
 - The overall area of the development exceeds 5ha.
- 2.6 Whilst the Site covers a relatively small total area (approximately 0.13 ha), the Proposed Development comprises up to 360 new dwellings and therefore exceeds the 150 dwelling threshold. As such, the Proposed Development exceeds the Schedule 2 criteria and there is a legal requirements to consider whether significant environmental effects are likely to arise, as a result of the Proposed Development. Schedule 3 of the EIA Regulations must be considered to determine the need (or otherwise) for EIA. In particular the following is considered:



- The characteristics of the Proposed Development (see Section 3: Site Context and Development Proposal);
- The location of the Proposed Development (see Section 3: Site Context and Development Proposal and **Appendix 2**); and
- The types and characteristics of the potential environmental effects (see Section 4: Environmental Context and Consideration).
- 2.7 As set out in the bullet points above the potential for environmental effects needs to be determined, to confirm whether or not any potentially significant adverse environmental effects will arise due to the Proposed Development. This screening assessment is set out within Chapter 4.

Planning Practice Guidance

- 2.8 The Government's Planning Practice Guidance (PPG)² offers guidance to assist Local Planning Authorities in determining EIA Screening Opinions. The PPG explains that only a very small proportion of Schedule 2 development will require EIA.
- 2.9 The PPG provides indicative thresholds and criteria, however it specifically states and highlights the following in bold:

"However, it should not be presumed that developments above the indicative thresholds should always be subject to assessment, or those falling below these thresholds could never give rise to significant effects, especially where the development is in an environmentally sensitive location. Each development will need to be considered on its merits.

- 2.10 The PPG goes on to highlight that sites which have not previously been intensively developed are more likely to trigger EIA.
- 2.11 The PPG also notes that in general, the more environmentally sensitive the location, the lower the threshold will be at which significant effects are likely (paragraph: 057, reference ID: 4-057-2070720).

Cumulative Development

2.12 Guidance on the consideration of cumulative effects in the EIA screening process is set out in the PPG, which states:

² Ministry of Housing, Communities and Local Government, Ministry of Housing, Communities & Local Government (2018 to 2021) and Department for Levelling Up, Housing and Communities (March 2014, as amended). *Planning Practice Guidance: Environmental Impact Assessment*. Available online at: <u>https://www.gov.uk/guidance/environmental-impact-assessment</u>



"Each application (or request for a screening opinion) should be considered on its own merits. There are occasions, however, when other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development. The local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development."

2.13 The potential for significant adverse cumulative effects with other developments has therefore been considered within Section 4 of this Screening Report. Consideration has been given to the geographic distance from the Site, level of certainty of delivery of cumulative schemes, demolition/ construction timescales, and whether significant cumulative effects from other development and the Proposed Development could occur during operation.



3.0 SITE AND PROPOSED DEVELOPMENT

Site Description and Context

- 3.1 The Site covers approximately 0.13 ha and is located directly north of Watkin Road in Wembley, approximately 400m south-east of Wembley Park Underground Station (Ordnance Survey National Grid reference TQ19658605). The Site comprises existing low-rise red brick commercial units and currently operates as a vehicle repair shop (No. 7) and an art workshop (No. 8). The Site location and boundary are shown at **Appendix 2**.
- 3.2 The Site is constrained in all directions with a service road/ shared yard, a line of trees and Wealdstone Brook approximately 8m to the north (at its closest point) beyond which are two to four storey residential buildings and the railway line. To the east along Watkin Road there are low-rise commercial units and to the south are low-rise industrial buildings, vehicle parking and beyond this, new high-rise residential buildings. To the west there are low-rise industrial units, construction sites and high-rise residential buildings. Figure 3.1 shows the Site and surrounds.



Figure 3.1: Site (highlighted red) and Surrounding Context (Claridge Architects, 2024)

- 3.3 Vehicular and pedestrian access to the Site is directly off Watkin Road from the junction with Fulton Road. Watkin Road itself comprises double yellow lines on both sides of the carriageway.
- 3.4 The Site has a Public Transport Accessibility Level (PTAL) rating of 4³ (with PTAL 5 and 6a further west along Fulton Road) and is within approximately 550m of bus stops offering services to

³ PTALS are a detailed measure of the accessibility of a point to the public transport network, taking into account the time it takes to walk and service availability. The method is a way of measuring the density of the public transport network at any location within Greater London. Each area is graded where a score of 0 is very poor access to public transport, and 6b is excellent access.



Kilburn, Ealing and Gunnersbury. Further to this, the nearest London Underground station is Wembley Park an approximate 7 minute walk/ 4 minute cycle from the Site.

- 3.5 There are no Public Rights of Way (PRoW) on or adjacent to the Site boundary.
- 3.6 The Site gradually slopes from 30.45m Above Ordnance Data (AOD) in the north-west to 30.90m AOD in the south-east. The Wealdstone Brook to the north of the Site dips to 27.40m AOD.

Environmental Context

- 3.7 There are no statutory ecological, landscape or historic designations located on or adjacent to the Site. The nearest statutory designation is the Brent Reservoir SSSI located approximately 1,500m north-east of the Site.
- 3.8 As such, the Site is located within the Impact Risk Zone (IRZ)⁴ for the Brent Reservoir SSSI and owing to its distance, is considered to pose no risk to the SSSI. The Site is not located within any other IRZs. The next closest ecological designation is the Fryent Country Park Local Nature Reserve (LNR) located approximately 1,100m north of the Site.
- 3.9 Wealdstone Brook, located approximately 8m north of the Site (at its closest point), is a designated Site of Important Nature Conservation (Grade 2). The Brook sits within a concrete channel and is lined with mature trees.
- 3.10 The Site is not within or adjacent to a Conservation Area and there are no listed buildings or locally listed buildings on or close to the Site. The closest listed buildings are the Grade II Wembley Arena (formerly The Empire Pool) approximately 445m from the Site and the Grade II Listed Three K6 Telephone Kiosks and Grade II Listed Brent Town Hall approximately 495m and 615m from the Site, respectively.
- 3.11 There are no Scheduled Monuments, Registered Parks and Gardens or World Heritage Sites on or within the vicinity of the Site.
- 3.12 The Site is not located within a locally defined Archaeological Priority Area.
- 3.13 The Site is located within two protected strategic views; White Horse Bridge and Chalkhill Park, which includes the stadium and the Wembley Arch.

⁴ The Impact Risk Zones (IRZs) have been developed by Natural England to make a rapid initial assessment of the potential risks posed by development proposals to: Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites.



3.14 The Site is located within Flood Zones 2 and 3a and as such, there is a medium to high probability of flooding (fluvial and tidal) occurring. Figure 3.2 shows the Environment Agency Flood Zone map.

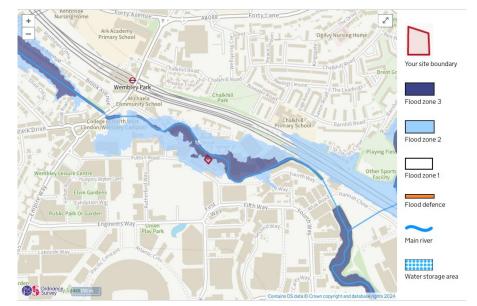


Figure 3.2: Flood Zone of Site (Environment Agency, 2024)

- 3.15 The Site is located within the Brent Air Quality Management Area (AQMA) which covers the whole of the borough for annual mean nitrogen dioxides, daily mean PM10 and PM2.5. It is also located within the Wembley and Tokyngton Air Quality Action Area and the Wembley Park/ Ark Academy Air Quality Focus Area (AQFA)⁵
- 3.16 There are no existing Tree Preservation Orders (TPOs) on or adjacent to the Site, however the Wealdstone Brook supports a linear group of trees which run parallel.

Planning Context

3.17 The Site is located within the Wembley Growth Area and Wembley Opportunity Area as part of the London Plan and is part of the wider Watkin Road site allocation within the Brent Local Plan 2019-2041 (Site Allocation: BCSA6) (published 2022) allocated for mixed use, residential led development incorporating maximum re-provision of industrial space, with an indicative capacity of 717 dwellings and industrial floorspace at ground floor. The allocation also confirms, alongside the Wembley Park Tall Building Zone allocation, that the Site is appropriate for tall buildings⁶, subject to them being lower than the adjacent approved parameters of sites to the south and not adversely affecting protected views of the stadium or the residential amenity of occupiers of North End Road.

⁵ An Air Quality Focus Area (AQFA) is a location that has been identified as having high levels of pollution as well as high levels of human exposure.

⁶ Tall buildings are defined by LBB as buildings over 30m in height.



Site Planning History

- 3.18 On 3 June 2011 an application (ref: 10/3118) for the change of use from tyre repair shop (Use Class B2) to mixed use of tyre repair shop and radio-controlled mini cab office (Sui Generis) was approved at 7 Watkin Road.
- 3.19 There is no planning history for 8 Watkin Road. It is understood that it is currently in use as an art workshop.

Surrounding Developments

3.20 The Wembley Growth Area has been the recent subject of a number of constructed, emerging and approved tall projects within close proximity of the Site (as shown by Figure 3.3). To the south of the Site, 1-4 and 9 Watkin Road is under construction and comprises buildings of 6 to 27 storeys with a 20-storey building on the site of 9 Watkin Road. To the west a 24 storey tower has been consented and is under construction at 10-11 Watkin Road. Further to this, there is the nearby existing 13 storey Amex House, 23 storey Apex House, 17 storey Parkwood House and 19 storey Felda House.

Figure 3.3: 3D Model of Emerging Context (approximate Site location indicated by red arrow).



Description of Proposed Development

- 3.21 The Proposed Development comprises the demolition of existing buildings and redevelopment of the Site to provide the following:
 - Up to 900sqm of commercial floorspace, (including re-provision of existing 867sqm of floorspace);
 - Up to 360 student accommodation bed spaces;



- An intention to provide 35% affordable accommodation;
- Approximately 289sqm external community amenity space and approximately 610sqm of internal amenity space (shared kitchens and shared facilities in student accommodation);
- 10% of student bed spaces have been designed to provide accessible and adaptable rooms, as set out in BS 8300:2:2018 Design of an accessible and inclusive built environment – Buildings, Code of Practice⁷; and
- Cycle parking (approximately 274 cycle spaces for student accommodation and 5 cycle spaces for commercial use) and refuse storage.
- 3.22 Proposed buildings will be up to 18 storeys in height are anticipated to comprise a central block with two shorter shoulder blocks either side broken up with varied architectural styles.
- 3.23 The Proposed Development will be car-free and with the exception of disabled parking spaces, no other car parking spaces are proposed.
- 3.24 Access will be directly off Watkin Road and a 10m service/ loading bay is proposed along Watkin Road large enough to accommodate refuse vehicles.
- 3.25 Measures to enhance the sustainability and environmental benefits of the Proposed Development will be an inherent part of the design evolution, in particular through landscaping, Sustainable Drainage Systems (SuDS) and biodiversity enhancement to exceed the statutory Biodiversity Net Gain (BNG) requirement of 10%.
- 3.26 The Proposed Development will target BREEAM Excellence standard, and the Energy and Sustainability Strategy is anticipated to incorporate solar cells and high efficiency heat pump systems.
- 3.27 Best environmental practice during the demolition and construction phase will also be adhered to, including through the implementation of a Construction Environmental Management Plan (CEMP) and a Construction Traffic Management Plan (CTMP) to be secured by planning condition.

⁷ British Standards Institution (2018). *Design of an accessible and inclusive built environment – Buildings. Code of Practice.* Online at: <u>https://knowledge.bsigroup.com/products/design-of-an-accessible-and-inclusive-built-environment-buildings-code-of-practice?version=standard</u>



4.0 SCREENING ASSESSMENT

4.1 A high-level assessment of the potential environmental effects of the Proposal Development are summarised in Table 4.1 below. A conclusion is also provided for each topic – all of which conclude that significant environmental effects are not anticipated.

Table 4.1: Potential effects and	environmental considerations
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Торіс	Potential for significant effects
	A Transport Scoping Note ⁸ has been prepared for this Site. The Site is well connected to public transport, including nearby bus stops and is within walking and cycling distance of Wembley Park Underground Station. Vehicular access to the Site is directly off Watkin Road from the junction with Fulton Road, however pedestrian access to the Site and the public realm is generally poor and car dominated.
	During demolition and construction works, it is anticipated that a number of arrivals and departures by construction staff will be made by sustainable and active modes of travel. When construction vehicle arrivals are required (i.e. to remove spoil or deliver materials), all movements will be scheduled and managed through the implementation of a CTMP, secured through planning condition.
	During operation, the Proposed Development will be car-free and will provide a single 10m service/ loading bay on Watkin Road for waste collection and general deliveries.
Traffic and Transport	The initial forecast trip generation for the student accommodation indicates that during the typical AM and PM peak hours (typically 08:00-09:00 and 17:00-18:00), approximately over half (51.9%) of all trips will be on foot followed by bus (21.3%) then by underground rail (15.9%). It is also noted that the majority of trips to/ from the student accommodation will likely occur outside of typical peak hours due to lecture schedules.
	Further to this, it is acknowledged that there will likely be high levels of movement at times students are moving into/ out of the accommodation. However, this is a necessary by-product of student accommodation with the impact being once a year on the move-in day whilst trips associated with moving-out are generally dissipated across a wider time period. To mitigate the impact of this specific pattern of movements, a Purpose-Built Student Accommodation Management Plan setting out student move in/ move out processes will be prepared to support a planning application.
	The forecast trip generation for the commercial use demonstrates that it will attract low levels of trips during both the AM and PM peak periods and that employment trips would predominantly be by underground (35.3%), following by bus (26.0%), by train (17.8%) and by foot (12.9%).

⁸ SLR Consulting Limited (2024). 7-8 Watkin Road, Wembley, Transport Scoping Note.



Торіс	Potential for significant effects
	On this basis, it is forecast that overall the Proposed Development will remove car trips associated with the existing uses on Site from the local highway network. Further to this, servicing and delivery trips are anticipated to be limited and managed through a Delivery, Servicing and Refuse Management Plan, to be submitted with the planning application.
	Secure, high quality cycle parking will be provided on Site. In accordance with London Plan standards, this is anticipated to comprise approximately 266 long stay and nine short stay cycle parking spaces associated with the student accommodation and four long stay and one short stay space associated with the commercial space. Provision will also be made for larger cycles, such as cargo bikes. Changing and storage areas will also be provided to promote travel by an active mode of transport.
	In conclusion, the Proposed Development is not forecast to result in a significant increase in vehicle traffic on the local highway network during demolition, construction or operation, and therefore will not result in a significant cumulative impact on the local highway network.
	A Transport Assessment (TA) will be submitted with the planning application in accordance with Transport for London's Healthy Streets guidance. A Travel Plan (TP) will also be submitted to promote sustainable modes of transport to help minimise vehicular trips on the highway network.
	VIEW: NO POTENTIALLY SIGNIFICANT ADVERSE EFFECTS
	The Site is located within the Wembley Growth Area and Brent AQMA which covers the whole of the borough of Brent for annual mean nitrogen dioxides, daily mean PM10 and PM2.5. It is also located within the Wembley and Tokyngton Air Quality Action Area and the Wembley Park/ Ark Academy Air Quality Focus Area (AQFA) ⁹ . Further to this, there are no statutory protected ecological sites in the immediate vicinity of the Site (refer to the Biodiversity section of this table).
Air Quality	During demolition and construction, necessary mitigation will be secured through a CEMP, which will include a Dust Management Plan (DMP), to be secured via planning condition. This will also include measures to control emissions and may include monitoring of dust deposition and/ or visual inspections. Following the implementation of appropriate mitigation measures, air quality guidance is clear that the residual effect should not normally be significant.
	A CTMP will also be implemented, to ensure that demolition and construction vehicles are appropriately managed to avoid significant environmental effects. The CTMP would be secured by planning condition.
	Once operational, the Proposed Development will be car-free and as such, on-Site car parking for residents, employees and visitors is not provided. A 10m service/

⁹ An Air Quality Focus Area (AQFA) is a location that has been identified as having high levels of pollution as well as high levels of human exposure.



Торіс	Potential for significant effects
	loading bay only will be provided along Watkin Road and cycle parking for commercial employees will be provided on Site.
	As previously discussed in the Traffic and Transport section of this table, the forecast trip generation undertaken for the commercial use and by students demonstrates that the Proposed Development will attract low levels of trips during both the AM and PM peak periods. Furthermore, it is forecast that the Proposed Development will in fact remove car trips associated with the existing uses on Site from the local highway network.
	As such, emissions from vehicles relating to the operation of the Proposed Development are not anticipated to result in significant air quality effects, whereby air quality is considered acceptable for future residents, employees and visitors to the Site.
	VIEW: NO POTENTIALLY SIGNIFICANT ADVERSE EFFECTS
	The main sources of noise on Site are from the surrounding local highway, existing (vehicle repair) and adjacent industrial uses, nearby construction sites and the rail line approximately 140m north of the Site (separated by existing dwellings).
	Standard demolition and construction environmental management techniques will be included within a CEMP, including the use of modern, low noise emission plant and machinery and activities within standard defined working hours. These techniques and measures will minimise noise and vibration effects during demolition and construction. Traffic-related noise and vibration will be managed via the CEMP and CTMP, and is therefore not anticipated to result in significant effects.
Noise and Vibration	Owing to its predominantly car-free nature, once operational the Proposed Development is not anticipated to give rise to significant levels of traffic. As previously mentioned, assessment indicates the Proposed Development will in fact remove car trips associated with the existing uses on Site from the local highway network.
	The Proposed Development will be designed to ensure noise generated by any external plant will accord with relevant policy requirements and industry standard guidelines, and where required will incorporate specifically designed enclosures. The Proposed Development will also be designed to ensure future employees and residents experience a suitable internal noise and vibration environment through sufficient sound insulation, double glazing. As a result, it is not anticipated that the operational Proposed Development will give rise to significant noise and vibration effects.
	VIEW: NO POTENTIALLY SIGNIFICANT ADVERSE EFFECTS
Townscape and Visual	The Site is urban and is occupied and directly surrounded by low-rise, red brick commercial units that have an industrial appearance.



Topic **Potential for significant effects** The Site is located within the Wembley Park Tall Building Zone in the Brent Local Plan 2019-2041 (ref. BCSA6) and as such, the Site is considered appropriate for tall buildings, subject to them being lower than the adjacent approved parameters of sites to the south, and not adversely affecting protected views of the stadium or the residential amenity of the occupiers of North End Road. It goes on to confirm that tall buildings will be acceptable taking into account the need to mediate between heights of the adjacent development sites plus Parkwood House (17 storeys), Apex House (23 storeys) and Empire Court (4 storeys). The Site is adjacent to the edge of the Wembley Masterplan Zone close to existing and emerging dense developments and is therefore considered less sensitive. The demolition and construction works will require equipment and materials to be stored on Site and as such, there will be some adverse visual impacts on nearby residential receptors and the surrounding townscape as a result of the works. However, these impacts will be limited, localised and temporary in nature and therefore not significant. Whilst the works may be visible during demolition and construction, the Site is relatively well screened from the north due to the trees adjacent to the Brook and from the west due to the existing tall buildings. The works will not result in any direct effects on built heritage assets. To minimise townscape and visual effects during demolition and construction, a CEMP will set out management measures to including hoarding on Site. The CEMP will be secured by planning condition. The massing of the Proposed Development has evolved to move the tallest element to the centre (including the core) with two shorter shoulder blocks either side, to incorporate set backs on the front façade of the central block and also to repeat breaks in the massing of surrounding buildings. As such, the massing of the Proposed Development has purposefully been designed to assimilate into the surrounding and emerging cluster of tall buildings, including taller buildings along Olympic Way, and in order to protect views of the Wembley Stadium Arch, particularly as seen from the strategic Local Plan viewpoint in Chalkhill Park to the north-east of the Site. Further 3D modelling of the Proposed Development in the context of the existing and emerging tall buildings evidences the fact the Proposed Development does not encroach upon the Wembley Arch from the protected Chalkhill Park view. Further protected views were also tested in VU.CITY and it was subsequently agreed with LBB that these could be scoped out of the assessment due to lack of impact. Specific viewpoint locations have subsequently been agreed with LBB to be assessed as part of the Townscape and Visual Impact Assessment It is anticipated that there will be some adverse townscape impacts on the nearby

It is anticipated that there will be some adverse townscape impacts on the nearby townscape character during the demolition and construction stage as a result of visual and environmental effects necessary to facilitate the Proposed Development. However, these impacts will be limited, localised and temporary in nature and therefore not significant. Further to this, it is also anticipated that there will be adverse impacts to nearby visual receptors during this stage of the development, in particular to residents of Empire Court. Again, these impacts will



Торіс	Potential for significant effects
	be limited, localised and temporary in nature and therefore not significant. To minimise townscape and visual effects during demolition and construction, a CEMP will set out management measures to including hoarding on site. The CEMP will be secured by planning condition.
	Beneficial townscape impacts are anticipated in the operational stage of the Proposed Development owing to the improvement of the architecture and landscaping within the Site. No significant impacts are anticipated to townscape character areas during the operational stage.
	Once operational, beneficial impacts are anticipated on the townscape character and to a number of visual receptor groups owing to the improvement of the architecture and landscaping within the Site.
	Taller development on the Site has the potential to give rise to adverse visual impacts to receptor groups in close proximity, owing to the contrasting height and scale of the Proposed Development in local views. In accordance with policy BCSA6 the Proposed Development is markedly lower than the adjacent approved parameters of sites to the south, and the form of the Proposed Development has been mediated to provide a transition in scale to the residential area of North End Road. These impacts will be further mitigated by the high quality design of the Proposed Development as a whole. As such, no significant impacts are anticipated to visual receptors once operational.
	Overall, the Proposed Development introduces new built form which will integrate into the built fabric and wider existing and emerging context in terms of proportion and relationship with other buildings.
	Monatagu Evans are preparing a Heritage and Townscape Visual Impact Assessment which will be submitted with the planning application.
	VIEW: NO POTENTIALLY SIGNIFICANT ADVERSE EFFECTS
	Historic Environment The industrial buildings on Site are generally of a poor quality with a car dominated, low quality public realm, whereas the nearby recently completed tall buildings are generally high quality and provide limited but good quality public realm.
Historic Environment and Archaeology	The Site does not lie within, nor does it adjoin a Conservation Area. The closest Conservation Area to the Site are the Barn Hill Conservation Area approximately 500m north-west of the Site and the adjacent Lawns Court Conservation Area approximately 800m north-west of the Site at its closest point. Further to this, St Andrews Conservation Area and Neasden Conservation are located approximately 900m north-east of the Site.
	There are very few statutory listed buildings within the surrounding area, with listed buildings within 1km of the Site being limited to the following:



Торіс	Potential for significant effects
	 Grade II Wembley Arena, formerly The Empire Pool (located approximately 445m to the south-west); Grade II Three K6 Telephone Kiosks (located approximately 495m to the south-west); and Grade II Brent Town Hall (located approximately 615m to the north).
	There are no non-designated heritage assets within the site boundary.
	Owing to the distance of existing and emerging tall buildings in proximity of the Site, the Proposed Development assimilates into its surrounding context when viewed from the Grade II Wembley Arena, Grade II Three K6 Telephone Kiosks and Grade II Brent Town Hall. The same is true when viewed from the Barnhill, Lawns Court and Neasden Conservation Areas. The Proposed Development is not visible from the St Andrews Conservation Area to the north-east of the Site.
	Further to this, there are no Scheduled Monuments, Registered Parks and Gardens or World Heritage Sites on or within the vicinity of the Site.
	The potential impact of the Proposed Development is limited to intervisibility of heritage assets located to the north of the Site. No significant effects are anticipated to heritage assets in the demolition and construction and operational stages of the development owing to distances from the Site, the nature of the existing and emerging context, and the form and scale of emerging development. Where the Proposed Development is visible within proximity to the heritage assets, they will be seen across distance, physically separated by the railway line, and within the established context of taller development within the Wembley Park Tall Building Zone.
	On this basis, significant built heritage effects of the Proposed Development are not anticipated during demolition and construction activities or once built out and operational.
	Monatagu Evans are preparing a Heritage and Townscape Visual Impact Assessment which will be submitted with the planning application.
	Archaeology The Site is not located within a locally defined Archaeological Priority Area and the Proposed Development is not anticipated to impact on any designated archaeological assets.
	It is anticipated the Site has a generally low archaeological potential for all past periods of human activity. Whilst the possibility of waterlogged and paleoenvironmental remains contained within possible underlying alluvial deposits associated with the nearby Wealdstone Brook cannot be ruled out at this time, if present they are considered most likely to be of only local significance.
	Importantly, past ground disturbance at the Site is likely to have been severe with nearby geotechnical logs indicating extensive depths of Made Ground are likely and as such, the survival of underlying remains is likely to be highly variable.



Торіс	Potential for significant effects
	In summary, the limited archaeological potential of the Site, combined with historic disruption and impacts, suggest that the Proposed Development will have no significant adverse or widespread archaeological impacts.
	An Archaeological Impact Statement will be submitted with the planning application.
	VIEW: NO POTENTIALLY SIGNIFICANT ADVERSE EFFECTS
	The Site comprises buildings and hardstanding with a line of trees running parallel and adjacent to its northern boundary.
	There are no statutory ecological designations located on or adjacent to the Site. The nearest statutory designation is the Brent Reservoir SSSI located approximately 1,500m north-east of the Site. As such, the Site is located within the IRZ ¹⁰ for the Brent Reservoir SSSI and owing to its distance, is considered to pose no risk to the SSSI. The Site is not located within any other IRZs. The next closest ecological designation is the Fryent Country Park LNR located approximately 1,100m north of the Site.
	Wealdstone Brook, a designated Site of Important Nature Conservation (Grade 2), is located approximately 8m north of the Site at its closest point.
Biodiversity	Following an ecological survey of the Site, it is concluded that the existing building has no bat potential and no other protected species are likely to be present or using the Site.
biourversity	With the exception of Japanese Knotweed in the yard area to the north of the Site, there is no other vegetation found on Site. As a legally controlled species under Schedule 9 of the Wildlife and Countryside Act, the Japanese Knotweed will be removed prior to commencement of works on Site.
	A CEMP, including a DMP, will be produced and implemented to ensure that any direct impacts from pollution during the demolition and construction phases will be avoided. In particular this will ensure the protection of more important habitats that fringe the Site.
	Owing to its distance and the nature of the Proposed Development and its future users, it is not anticipated that there will be recreational or increased footfall impact on the Brent Reservoir SSSI. As such, the Proposed Development is not considered to present a risk to the SSSI.
	The Proposed Development will exceed 10% BNG. The Proposed Development

will incorporate mature native tree planting along Watkin Road as well as wind

¹⁰ The Impact Risk Zones (IRZs) have been developed by Natural England to make a rapid initial assessment of the potential risks posed by development proposals to: Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites.



Торіс	Potential for significant effects
	and drought tolerant planting and wildflower species to enhance biodiversity on Site, including on the outdoor amenity roof spaces.
	In conclusion, the Proposed Development is not anticipated to affect any feature or site of importance for biodiversity during demolition/ construction and operation that would lead to a significant effect. Direct and indirect effects are not anticipated due to the low ecological value of the Site and surrounding areas and given that the Site is already developed. Overall, proposals are anticipated to substantially enhance biodiversity across the Site.
	An ecological site survey has been undertaken to inform proposals and an Ecological Impact Assessment, Tree Survey and Arboricultural Impact Assessment will be submitted with the planning application.
	VIEW: NO POTENTIALLY SIGNIFICANT ADVERSE EFFECTS
	The nearest watercourse to the Site is the Wealdstone Brook approximately 8m north of the Site which discharges into the River Brent approximately 500m to the east of the Site.
	The Site is located within Flood Zones 2 and 3a and as such, there is a medium to high probability of flooding (fluvial and tidal) occurring ¹¹ . Flooding arises from the Wealdstone Brook but also enters the Site from Fulton Road to the south-west of the Site.
Hydrology and	Online flood mapping indicates that the Site is at low risk of overland surface water flooding, but that Watkin Road itself is high risk. This would be considered when developing any emergency evacuation planning associated with the wider flood risk of the Site.
Hydrogeology	The Site is not located within a Drinking Water Protected Area or Safeguard Zone (Surface Water) or a Drinking Water Safeguard Zone (Groundwater).
	Thames Water sewer flooding records indicate that there have been no incidents of flooding in the area as a result of surcharging of public sewers.
	British Geological Survey borehole data ¹² does not indicate a high water table and the presence of a clay substrata suggests there is negligible risk of flooding from groundwater. Further to this the Site, is not located within a groundwater Source Protection Zone.
	The Brent Reservoir is located approximately 1.5km north-east of the Site and is considered to pose a theoretical but extremely low flood risk to the Proposed Development.

¹¹ Flood Zone 2 is defined as having a medium probability of flooding, between 0.1% and 1.0% chance in any one year. Flood Zone 3 is defined as a high probability of flooding with greater than 1.0% chance in any one year.

¹² British Geological Survey, Boreholes TQ18NE108 (1996), and TQ18NE247 (1995).



Торіс	Potential for significant effects
	During demolition and construction, in accordance with standard practice and measures, the CEMP will ensure appropriate surface water drainage of the Site, and therefore ensuring there is no localised surface water flooding or risk of pollution off-Site.
	As the Site is at medium and high risk of flooding, the following features have been incorporated into the design of the Proposed Development in consultation with the Environment Agency (EA).
	 Proposed ground floor levels will be 600mm above flood level at 31.87mAOD as a minimum; Compensation based directly on the new additional building footprint (32m²). Therefore in accordance with the EA's advice a minimum of 32m² of floodplain area is to be compensated for between the current lowest ground level along the Watkin Road frontage. Areas of compensation would feature robust and resilient construction against flood damage; DEFRA climate change allowances for peak river flows, allocate this development to the higher central band for potential change in the 2080's. As such, this requires a 27% climate change allowance to be applied to river flows; Proposed basement will be constructed in a water tight manner, with all points of access being from the 31.87mAOD raised ground floor level; and Proposed residential space will not be provided within the basement. Direct access via a staircase will be provided from the basement to the 31.87mAOD level at ground floor.
	The Proposed Development will also incorporate SuDS to manage storm water and reduce the impact of run-off. These are anticipated to include green roofs at building level changes and pervious pavements in the form of block pavers or landscaping as part of a wrapped system. Surface water will be designed to cater for storm events up to 1 in 100 plus 40% climate change. The SuDS feature would remain privately owned and maintained.
	It is anticipated that the Proposed Development will adopt a gravity system as the foul drainage strategy, collecting vented soil stacks in the service void of the basement, prior to discharge to the existing public foul sewer at Watkin Road. This will be subject to a formal Section 106 agreement.
	A Flood Emergency and Evacuation Plan and Reservoir Failure Emergency Plan will also be prepared and submitted with the planning application. This includes signing up to the EA's Flood Warning Service.
	By incorporating the previously identified SuDS features and flood compensation areas, the Proposed Development will result in a net gain in flood alleviation volume. On this basis, it can therefore be concluded that the Proposed

Development will not increase flood risk on Site or elsewhere, and should instead provide overall betterment as required by the Environment Agency. On this basis,



Торіс	Potential for significant effects
	the Proposed Development is not anticipated to result in significant adverse impacts on flood risk.
	A Flood Risk Assessment (FRA), including a Sustainable Drainage Strategy, will be prepared for the Site and submitted with the planning application ¹³ . The design of the Proposed Development is currently being designed and informed by SBK consultants, the project's qualified and experienced drainage engineer.
	VIEW: NO POTENTIALLY SIGNIFICANT ADVERSE EFFECTS
	The Site has limited recorded history prior to the 1980s-90s but it is known that 7 Watkin Road has been used for a tyre repair shop since this time.
	The Site is generally considered moderate risk in terms of contaminated land. Given the historic uses on Site, there are potential risks which could potentially pose a risk to current/ future Site users and the environment. On this basis, it is anticipated the identified risks will be investigated and a report provided setting out options for remediation, where required.
Contaminated Land	The Proposed Development will not store, process or transfer hazardous substances.
	Based on the investigation findings, techniques and measures would be implemented, including via the CEMP, to manage the risk of any pollutant incidents as a result of demolition and construction activities.
	A Phase 1 Ground Conditions Report will be prepared and submitted with the planning application.
	VIEW: NO POTENTIALLY SIGNIFICANT ADVERSE EFFECTS
	An initial wind assessment was performed by GIA Surveyors Ltd using Computational Fluid Dynamics (CFD) to assess wind conditions at the ground level and elevated levels of the Proposed Development. To ensure a worst-case scenario the CFD model was run without trees or soft landscaping to ensure a worst-case scenario.
Wind Microclimate	Whilst the initial assessment did not include nearby committed developments, it was noted that these schemes are anticipated to provide additional shelter from the dominant south westerly winds, and results therefore reflect a worst-case scenario for future wind conditions.
	Assessment findings concluded that there are no expected wind safety risks for the Proposed Development, and comfort conditions are expected to be suitable. Further to this, The Proposed Development will incorporate standard measures, such as perimeter screening or landscaping at the roof terrace level to ensure the roof terraces are suitable for sitting and as amenity terraces. In conclusion, wind

¹³ SBK (2024). Flood Risk Assessment and Sustainable Drainage Strategy.



Торіс	Potential for significant effects
	conditions were reported as very calm, likely to become calmer once committed cumulative schemes are built out.
	Gordon Ingram Associates are preparing the final wind assessment which will be submitted with the planning application.
	VIEW: NO POTENTIALLY SIGNIFICANT ADVERSE EFFECTS
	Point 2 Surveyors Ltd have undertaken an initial daylight assessment to consider the potential impacts for existing and proposed surrounding residential development. The assessment work informs this EIA Screening report.
	The Site comprises low-rise buildings and as a result daylight levels within the Site and facing properties is unusually high as there are no obstructions to reduce daylight to these buildings. On this basis, it is acknowledged that any increase in the massing of buildings on Site will result in noticeable daylight impacts to some residential properties. However, in view of the fact the Site is located within the Watkin Road Site Allocation, Wembley Growth Area and Wembley Opportunity Area and Wembley Park Tall Building Zone, it is considered that impacted properties and the Proposed Development itself would have sufficient and appropriate levels of daylight in this context.
Daylight, Sunlight, Overshadowing, Light Pollution	The Proposed Development will be designed to maximise natural light internally where possible, and provide an outdoor roof terrace for residents with seating and shelter.
Light Pollution and Solar Glare	Owing to its distance from glazed buildings and the proposed building treatment and materials, significant impacts with respect to glint and glare are not anticipated.
	Owing to the existing urbanised context of the Site, the Proposed Development is not anticipated to result in significant effects with regard to light pollution and lighting will be designed to comply with the Institution of Lighting Engineers design guidance.
	Point 2 Surveyors Ltd are currently in consultation with LBB and a Daylight/Sunlight/ Overshadowing Assessment will be prepared by Point 2 Surveyors Ltd to support the planning application.
	VIEW: NO POTENTIALLY SIGNIFICANT ADVERSE EFFECTS
Socio-economics and Health	The Proposed Development will upgrade and re-provide the commercial space to contribute to LBB's need for this type of floorspace and provide up to 360 high quality new student bed spaces. Further to this, initial research into the local demand for student accommodation by Knight Frank ¹⁴ indicates the number of full-time students studying at universities across London has increased by 23.7% between 2018/19 to 2021/22, outstripping supply by a considerable margin.

¹⁴ Knight Frank (2024). Purpose-Built Student Accommodation Demand Note.



Торіс	ic Potential for significant effects	
	A further detailed, bespoke report will be submitted as part of a full planning application to demonstrate the scheme's benefits and the impact the proposals will have on the local student housing market and local housing market pressures.	
	The Proposed Development is anticipated to provide internal communal spaces, including a shared kitchen per cluster as well as communal seating areas, gym, study room and social hub space. It is also anticipated to provide an outdoor roof terrace with seating, shelter and biodiverse planting species. On this basis, the Proposed Development will promote social interaction and cohesion in the new student community within indoor and green outdoor spaces to help avoid feelings of loneliness and isolation. It will also provide an opportunity for regular physical activity.	
	The proposed commercial space will be designed to accommodate collaborative, creative spaces which could be shared by several small to medium businesses, including communal or breakout spaces, to promote social interaction.	
	Overall, proposals are therefore anticipated to result in positive social and economic benefits on a regional and local scale, including job creation and local expenditure during demolition, construction and operation of the Proposed Development.	
	The Proposed Development will be designed in accordance with appropriate national guidance and standards with respect to crime prevention and safety (including CCTV), and will incorporate additional Secure by Design measures. The Proposed Development is therefore not considered to result in a significant increase in crime levels, fear of crime or a decrease in community safety.	
	Potential health effects are considered as part of each topic in this table (air quality, noise and vibration, including traffic related, and contaminated land). No likely significant effects are anticipated for these topics. Further to this, 'in combination' effects between two or more aspects are not considered to result in significant health effects.	
	In conclusion, it is unlikely that there will be any significant adverse effects in relation to socio-economics and health.	
	VIEW: NO POTENTIALLY SIGNIFICANT ADVERSE EFFECTS	
	The CEMP will set out the measures and protocols to ensure the management of waste during demolition and construction in accordance with best practice, including practices to minimise and where possible, re-use and recycle waste.	
Waste	The Proposed Development will be designed in accordance with policy requirements and guidance to provide sufficient space and facilities for the storage, segregation and collection of waste, including an emphasis on re-use and recycling wherever possible.	



Topic

Carbon and

Climate Change

Potential for significant effects

VIEW: NO POTENTIALLY SIGNIFICANT ADVERSE EFFECTS

LBB declared a climate and ecological emergency in July 2019 and subsequently prepared a Climate and Ecological Emergency Strategy in 2021¹⁵. Limiting carbon emissions is therefore a key principle of the Proposed Development.

During demolition and construction, the Proposed Development has the potential to emit Greenhouse Gases (GHG) from the use of plant and machinery, construction traffic, and from embodied carbon associated with the structures demolished on Site and manufacturing of new building materials. The extent of emissions can however be mitigated through careful sourcing of construction materials to minimise GHG emissions associated with embodied carbon and transport, as well as direct emission reducing practices on-Site. The CEMP will set out measures to reduce the emission of GHGs, including by using modern, efficient and low carbon emitting construction plant and machinery, prohibiting vehicle idling and promoting active travel for workers on Site. The CEMP and CTMP will also ensure that construction phases do not give rise to significant vehicular traffic.

The Proposed Development is targeting BREEAM Excellence standard. It is also anticipated to incorporate photovoltaic cells on the available roof space and high efficiency heat pump systems to provide underfloor heating, and domestic hot water driven by air to water heat pump systems. The design is currently being shaped by the project Sustainability and Building Services Engineer (the PES)¹⁶ and will ensure that in accordance with relevant policy requirements, Building Regulations and industry guidelines, the Proposed Development will incorporate sustainability design features to minimise the overall carbon footprint and greenhouse emissions.

The Proposed Development will be designed to ensure resilience to climate change, taking account of climatic changes including temperature, wind conditions and water levels. As previously stated, the Site is located within Flood Zones 2 and 3, and is therefore considered to be at medium to high risk of flooding. A key part of the scheme will be the flood compensation and SuDS features that will also respond to climate change by ensuring the Proposed Development is necessarily resilient.

Even with all this said however, global climate change is global in cause and effect. As such, it therefore follows that by virtue of scale of the demolition and construction of the Proposed Development, that the works are unlikely to significantly contribute to global warming in their own right.

An Energy and Sustainability Strategy will be submitted with the planning application.

¹⁵ LBB (2021). Brent Climate and Ecological Emergency Strategy 2021-2030. Online at: <u>https://legacy.brent.gov.uk/media/16418130/appendix-a-brent-climate-_-ecological-emergency-strategy-2021-2030-</u>

<u>1.pdf? ga=2.222190106.327629032.1731280857-740616471.1726060425</u>

¹⁶ The PES (2024). Energy and Sustainability Statement.



Торіс	Potential for significant effects		
	VIEW: NO POTENTIALLY SIGNIFICANT ADVERSE EFFECTS		
Major Accidents and Disasters	Given the scale and nature of the Proposed Development and that it will be built in accordance with all necessary safety demolition and construction and design requirements, namely in response to flood risk (previously covered) and fire risk (managed through building design in accordance with relevant British Standards), it is considered that significant effects as a result of major accidents and/ or disasters are not considered likely. VIEW: NO POTENTIALLY SIGNIFICANT ADVERSE EFFECTS		
	Cumulative effects can occur when the effects associated with a number of projects in an area (which may, on an individual basis be insignificant) result in a significant effect when interacting together.		
	There is currently no guidance on how to define an appropriate study area for considering cumulative effects. The following criteria have therefore been developed to identify major development reasonably foreseeable to come forward within the vicinity of the Proposed Development. The identified criteria have been informed by paragraph 24 of the government's Planning Practice Guidance (PPG) 'When should cumulative effects be assessed?' ² and also guidance published by the Institute of Environmental Management and Assessment (IEMA) ¹⁷ .		
Cumulative Interactions	 Spatially linked to the Development (owing to the urban context of the Site a 1km Zone of Influence has been established); Anticipated to be built-out at the same time as the Proposed Development; Those which have received planning consent from the planning authority (granted or resolution to grant); Considered an EIA development and for which an ES was therefore submitted with the planning application; Refusals subject to appeal but not yet determined; Submitted applications under the Planning Act or other regimes but not yet determined; and/ or Application and/ or proposals to introduce sensitive receptors within close proximity to the Site boundary (but are not EIA development). 		
	A total of six cumulative schemes have been identified within the 1km Zone of Influence, of which five have been granted permission and are currently under construction. The closest of which are approximately 50-90m from the Site		

¹⁷ IEMA (June 2024). *Impact Assessment Outlook Journal-Volume 7: Demystifying Cumulative Effects July 2020,* Available online: <u>https://www.iema.net/resources/blogs/2020/07/17/iema-cumulative-effects-in-environmental-impact-assessment-are-more-important-than-ever-says-iema/</u>



Topic

Potential for significant effects

boundary at 1-4 and 9 Watkin Road (application ref: 22/3965), 10 and 11 Watkin Road (application ref: 18/3381), Euro House on Fulton Road (application ref: 21/2989) and several plots to the south of Fulton Road (application ref: 15/5550 (as amended by planning permissions 17/0328, 18/2214 and 20/2844)). The fifth granted application is approximately 250m from the Site and is for a Further Education College Campus which has not yet commenced demolition/ construction (application ref: 23/0578). The sixth application is approximately 500m north-west of the Site and is for an appeal (awaiting decision) for two blocks between 6 to 15 storeys (application ref: 23/3440).

Appeal Awaiting Decision

The appeal awaiting decision carries less weight owing to the uncertain timescales for delivery and due to its distance from the Site and urban context. As such, it is considered it will not result in significant adverse cumulative traffic and/ or visual impacts in combination with the Proposed Development during demolition, construction and operation. Furthermore, it is anticipated that once built out, views of the two blocks up to 15 storeys and the Proposed Development are unlikely to be seen owing to the cluster of existing and emerging tall buildings to the west and south of the Site.

Consented Schemes

Four of the five consented schemes are currently under construction. As such, it is anticipated these schemes will already be built out by the time demolition/ construction commences for the Proposed Development.

Whilst some plots have already been built out, it is anticipated that remaining phased plots of the consented North East Lands and North West Lands development to the south of Fulton Road (application ref: 15/5550 (as amended by planning permissions 17/0328, 18/2214 and 20/2844)) and the Further Education College Campus also on Fulton Road (application ref: 23/0578) could be built out at the same time as the Proposed Development. Demolition and construction traffic on Fulton Road associated with these schemes could therefore overlap with the demolition and construction phases of the Proposed Development, however associated traffic, air quality and noise impacts would be effectively minimised through the implementation of the CTMP and CEMP.

All cumulative schemes, including the remaining plots at the consented North East Lands and North West Lands and the Further Education College Campus, will adhere to a CEMP which will set out the best practices and measures to be implemented during the demolition and construction phases to avoid likely significant effects. Each CEMP will be pre-agreed with LBB prior to the commencement of any works.

A CTMP or equivalent for all cumulative schemes will also be implemented during the demolition and construction phases to minimise road traffic and adverse environmental effects related to demolition and construction activities.

In conclusion, with appropriate mitigation the cumulative effects of demolition and construction traffic are not considered to be significant.



TopicPotential for significant effects

Once built out and operational, it is anticipated that all five consented schemes will be viewed within the context of the existing and emerging cluster of tall buildings in the area. Each tall building will have been designed to assimilate into the wider urban context and to retain protected views. As such, significant cumulative townscape and visual impacts are not anticipated.

During the operational phases, the TA will consider the potential cumulative effects of relevant committed schemes and will be submitted as part of the planning application.

VIEW: NO POTENTIALLY SIGNIFICANT ADVERSE EFFECTS



5.0 CONCLUSION

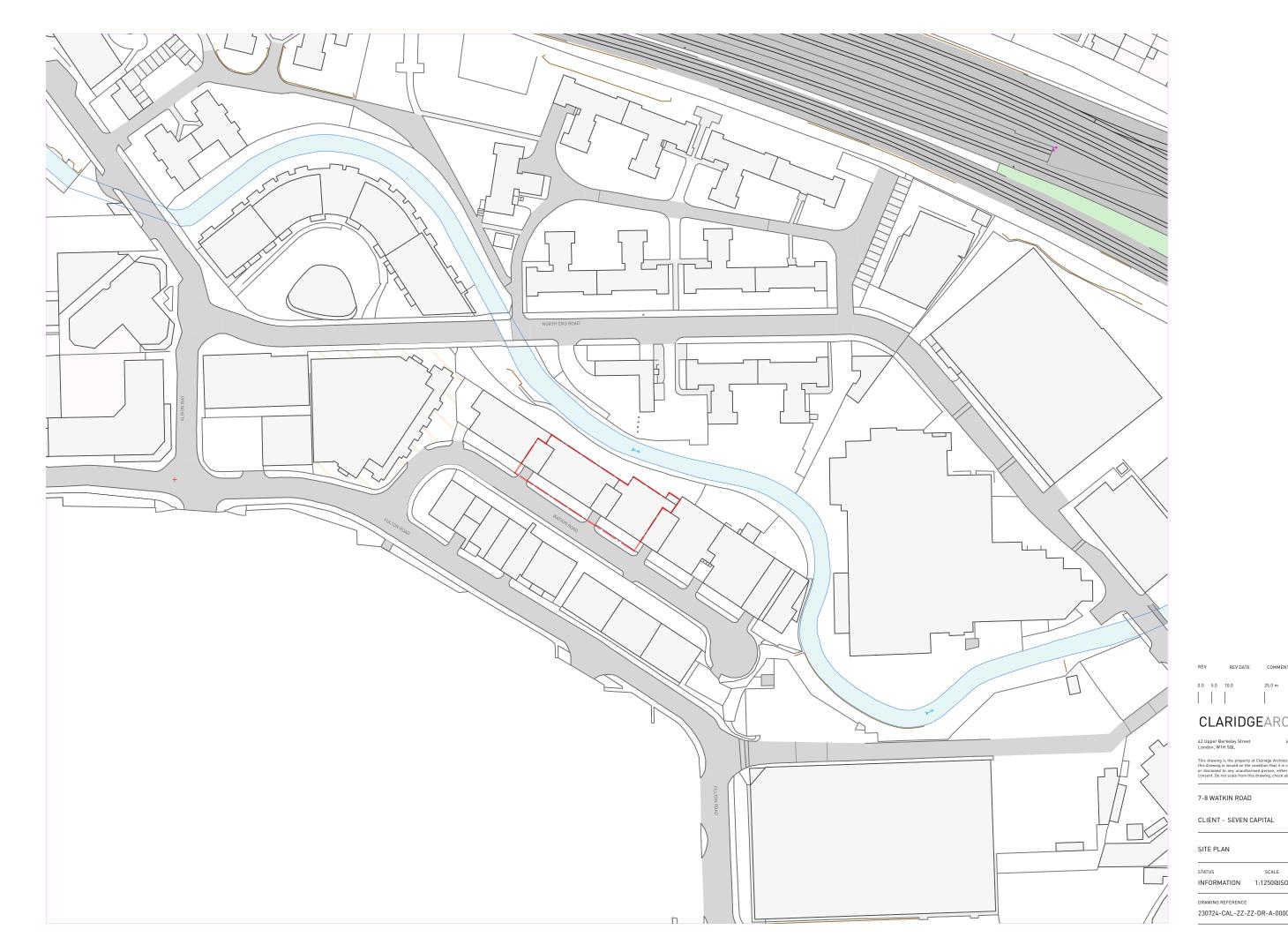
- 5.1 The Proposed Development falls within Category 10(b) 'Urban Development Projects' of Schedule 2 within the EIA Regulations. Whilst the Proposed Development does exceed the threshold of 150 dwellings, it does not exceed the total site area threshold of 5ha.
- 5.2 There are no statutory ecological, landscape or historic designations located on or adjacent to the Site. Further to this, the Site is not located within a sensitive area, as defined by the EIA Regulations.
- 5.3 The design and massing of the Proposed Development has evolved purposefully to assimilate into the surrounding and emerging cluster of tall buildings and to retain the protected view of the Wembley Stadium Arch from Chalkhill Park. Further to this, whilst located within Flood Zones 2 and 3a the Proposed Development has been designed to incorporate SuDS features and flood compensation areas so that it will not increase flood risk on Site or elsewhere, and should instead provide overall betterment.
- 5.4 The Proposed Development will provide a high quality scheme to meet an increasing need for student accommodation and replacement commercial space, as well as associated high quality public realm. It will provide biodiversity enhancement to exceed the statutory Biodiversity Net Gain (BNG) requirement of 10% and target BREEAM Excellence standard by incorporating solar cells and high efficiency heat pump systems.
- 5.5 With regard to the indicative criteria and thresholds identified in the PPG and the nature of the Proposed Development once operational, the Proposed Development is not anticipated to result in significant impacts alone or when considered cumulatively with the identified applications.
- 5.6 Any adverse environmental effects during demolition and construction of the Proposed Development will be managed and secured through the implementation of standard, tried and tested mitigation measures. These are summarised in **Table 4.1** as provided on the next page.
- 5.7 In conclusion, the Proposed Development does not have the potential for significant environmental effects and is therefore not considered to constitute EIA development as defined by the EIA Regulations.
- 5.8 We trust that the information presented within this report is sufficient for LBB to produce and issue an EIA Screening Opinion for the Proposed Development within three weeks from the date of this EIA Screening Opinion Request.

Table 4.1: Proposed Mitigation Measures

Environmental Topic	Mitigation Proposed	Delivery Mechanism
Transport	 Demolition and Construction Phase: Construction Environmental Management Plan (CEMP) to include: Development contacts, roles and responsibilities; Public communication strategy, including suppression, mitigation and avoidance measures to control dust; Noise reduction measures, including the use of acoustic screens and enclosures and hours of operation; and Use of barriers to protect adjacent land and any measures to control light spill during construction. 	To be secured by planning condition.
	Operational Phase: A Purpose-Built Student Accommodation Management and a Delivery, Servicing and Refuse Management Plan.	Both to be submitted with the planning application.
Noise	Demolition and Construction Phase: CEMP to include previously mentioned measures.	To be secured by planning condition.
Hydrology and Hydrogeology	Demolition and Construction Phase: CEMP to ensure appropriate surface water drainage of the Site thereby ensuring there is no localised surface water flooding or risk of pollution off-Site.	To be secure by planning condition.
	Operational Phase: A Flood Emergency and Evacuation Plan and Reservoir Failure Emergency Plan.	To be submitted with the planning application.
Air Quality	Demolition and Construction Phase: CEMP to include a Dust Management Plan (DMP) and previously mentioned measures.	To be secured by planning condition.
Waste	Demolition and Construction and Operational Phase: Site Waste Management Plan.	To be secured by planning condition.
Townscape and Visual Impact	Demolition and Construction Phase: CEMP.	To be secured by planning condition.

Environmental Topic	Mitigation Proposed	Delivery Mechanism
Ground Conditions (Contamination)	Demolition and Construction Phase: CEMP to include previously mentioned measures.	To be secured by planning condition.
	A Phase 1 Ground Conditions Report. Any identified risks will be investigated and a report provided to LBB setting out options for remediation as required.	To be submitted with the planning application.
Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare	Operational Phase: A Daylight/Sunlight/ Overshadowing Assessment will be prepared by Point 2 Surveyors Ltd to support the planning application.	To be submitted with the planning application.
Carbon and Climate Change	Demolition and Construction Phase: CEMP will set out measures to reduce the emission of greenhouse gases.	To be secured by planning condition.

APPENDIX 1 SITE LOCATION PLAN (March, 2024)



REV REV DATE COMMENTS

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7-8 WATKIN ROAD

CLIENT - SEVEN CAPITAL

SITE PLAN

STATUS	SCALE	DATE		
INFORMATION	1:1250@ISO A3	08/03/2024		
DRAWING REFERENCE	REVISION			
230724-CAL-ZZ-ZZ-DR-A-00001				

APPENDIX 2 SENSITIVE AREA DEFINITION

EIA definition of a 'Sensitive Area' (Regulation 2 of the EIA Regulations 2017 with amends)

"sensitive area" means any of the following-

(a) land notified under section 28(1) (Sites of Special Scientific Interest (SSSIs)) of the Wildlife and Countryside Act 1981(23);

(b) a National Park within the meaning of the National Parks and Access to the Countryside Act 1949(24);

(c) the Broads(25);

(d) a property appearing on the World Heritage List kept under article 11(2) of the 1972 UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage(26);

(e) a scheduled monument within the meaning of the Ancient Monuments and Archaeological Areas Act 1979(27);

(f) an area of outstanding natural beauty designated as such by an order made by Natural England under section 82(1) (areas of outstanding natural beauty) of the Countryside and Rights of Way Act 2000(28) as confirmed by the Secretary of State;

(g) a European site (within the meaning of regulation 8 of the Conservation of Habitats and Species Regulations 2017 as amended), including Special Areas of Conservation (SACs) and Special Protection Areas (SPAs).





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