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Southwark Council
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London
SE1P 5LX

10th April 2022

Dear Sir/Madam,

REQUEST FOR SCREENING OPINION UNDER REGULATION 6 OF THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017

1-4 AND 9 WATKIN ROAD, WEMBLEY, LONDON, HA9

This letter has been prepared by ROK Planning on behalf of Tribe Watkin Road (1-4 & 9) Ltd, to request an Environmental Impact Assessment ('EIA') Screening Opinion from London Borough of Brent ('LB Brent' or 'the Council') in relation to a mixed-use development proposed at the above site.

Screening Opinion Under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('the Regulations') require the following to be provided for a screening opinion:

- (a) a plan sufficient to identify the land;*
- (b) a description of the development, including in particular—*
 - (i) a description of the physical characteristics of the development and, where relevant, of demolition works;*
 - (ii) a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;*
- (c) a description of the aspects of the environment likely to be significantly affected by the development;*
- (d) to the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from—*
 - (i) the expected residues and emissions and the production of waste, where relevant; and*
 - (ii) the use of natural resources, in particular soil, land, water and biodiversity; and*
- (e) such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.*

This letter briefly summarises the site and local context, the relevant national, regional and local planning policies and guidance, and the development proposals. This letter also considers the proposed development's potential environmental effects in relation to the criteria set out in Schedule 3 of the Regulations and related guidance. In addition to this letter, a site location plan has also been submitted in support of this Screening Opinion.

In determining whether the proposed development requires an EIA, LB Brent is required to follow Part II, Section 6 of the Regulations and the relevant schedules. Further guidance regarding the screening of Schedule 2 projects and the general EIA process can be found in the National Planning Policy Guidance.

Site Description and Context

The Site is located within Wembley Opportunity Area, within the jurisdiction of London Borough of Brent.

Extending to approx. 0.27ha, the existing Site comprises a row of double-storey industrial units with servicing/parking space to the front and/or rear. Wealdstone Brook flows to the rear of 9 Watkin Road

With a Public Transport Accessibility Level (PTAL) of 4, the Site is in an accessible location. The closest stations are Wembley Park (Jubilee, Metropolitan lines) approximately 300m north-west and Wembley Stadium (Chiltern Railways) approximately 800m south-west of Site providing regular services to central and west London. Bus stops are located along Fifth Way and Engineers Way to the south of Site, providing services to Neasden, Brondesbury Park, Hanwell, Kingsbury and Turnham Green.

The Site does not contain any statutorily or locally listed buildings and is not located within a conservation area. However, the Site is located within a viewing corridor of Wembley Stadium to Chalkhill Park.

Partly located in flood zones 2 and 3, the Site has a moderate/high risk of both surface water and fluvial flooding.

The surrounding area is undergoing a period of change, through the regeneration of Wembley Opportunity Area/ Wembley Growth Area. In the immediate area, Barratt Homes are developing 10-11 Watkin Road (229 residential units in buildings up to 23-storeys), the Euro House redevelopment to the south (749 homes in buildings up to 24-storeys) to the west and south the Quintain Masterplan will deliver approximately 7,500 new homes, 400,000 sqft of leisure, 750,000 sqft of office and 425,000 sqft of retail.

Planning History

Planning application ref. 20/0587 was submitted in February 2020 for the following development on site:-

“Demolition of existing buildings and erection of 1x part-20, part-17 storey building and 1x 14 storey building together containing 174 residential units; commercial floor space (B1a and B1c use class) on ground, first and second floors; car and cycle parking, refuse storage, amenity space and associated landscaping.”

The scheme was given resolution to grant at Planning Committee on 9 September 2020. A S106 Agreement was later agreed and the development granted planning consent 13 September 2021.

Proposed Development

The application seeks to demolish the existing buildings and structures on site, and construction of 2no. blocks – a northern block of 14-storeys and a southern block, 15, 17 and 20-storeys.

At ground floor of the south block, approximately 1,544sqm commercial Class E(g) floorspace will be provided.

Above ground floor of the north and south block, 613 student bed spaces will be provided (sui generis), including 6% wheelchair accessible units. Student bed spaces will be secured for the use of students at an established university via nominations agreement. The mix is set out below:

Unit Type	Minimum Area (sqm GIA)	Number of Units
Ensuite Rooms	12.5	320
Ensuite Rooms	13.4	160
Wheelchair Accessible Ensuite Rooms	23.4	35
Studios	19.5	98

The 225 ensuite rooms are grouped in clusters (cluster flats) with access to a communal kitchenette, shared by the residents of that cluster flat only.

All students will benefit from 239sqm communal amenity space at ground and 1st floor of the north block and 681sqm of communal amenity space at 1st and 3rd floor of the south block.

The development will be car-free, with disabled car parking as required by the London Plan.

Cycle stores comprising long-stay cycle parking spaces for students will be located at the basement and long-stay cycle parking spaces for commercial occupiers at ground floor of the south block. Short-stay cycle parking spaces will be located in the public realm area to the front of the development.

Two dedicated refuse stores for students and commercial occupiers will be located at ground floor of the north block, with an additional refuse store for students at ground floor of the north block.

Screening Assessment

EIA Regulations

EIA development is defined in the EIA Regulations as being either:

- Schedule 1 development; or
- Schedule 2 development defined as “likely to have significant effects on the environment by virtue of factors such as its nature, size or location”.

Schedule 3 of the Regulations sets out selection criteria for considering Schedule 2 proposals – i.e. what constitutes “significant effects”.

Schedule 1

EIA is mandatory for projects listed in Schedule 1 of the EIA Regulations. Schedule 1 developments are large scale projects for which significant effects would be expected and comprise developments such as new airports and power stations. The proposed development is not of a type listed in Schedule 1.

Schedule 2

Schedule 2 10(b) urban development projects thresholds are as follows:

1. part (i) as the development includes more than 1 hectare of urban development which is not dwellinghouse development;
2. part (ii) the development includes more than 150 dwellings; or
3. part (iii) the overall development exceeds 5 hectares

There is no fixed definition of the term 'dwelling' within the EIA Regulations, however, for the purpose of undertaking EIA Screening it is considered that 2.5 student bedspaces equates to one dwelling / unit (in accordance with London Plan 2021 supporting paragraph 4.1.9). The scheme will provide circa 245.2 new homes and therefore the proposed development constitutes Schedule 2 development. This means that the Local Planning Authority must consider whether the proposal is likely to have significant effects on the environment. In order to assess whether or not there are likely to be any significant environmental effects, the selection criteria contained in Schedule 3 should be applied. This includes:

- a) The characteristics of development, having regard to size, design, cumulative impacts, use of natural resources, production of waste, pollution, nuisance and accidents;
- b) The location of development, by reference to the environmental sensitivity of the area, having regards to (amongst other things), existing use, statutory designation and landscapes of historical, cultural or architectural significance); and
- c) The types and characteristics of the potential impact (having regard to factors including the magnitude and spatial extent of the impact, the nature and probability of the impact and the possibility of effectively reducing the impact. EIA Regulations require EIA for qualifying development where there are likely significant environmental impacts, and not solely where there would be likely environmental impacts that could be mitigated. Where likely impacts have been identified and potential mitigation is known to be capable of reducing such impact to less than 'significant' then such environmental considerations establish that an EIA is not required.

Schedule 3

Schedule 3 of the EIA Regulations sets out selection criteria which relate to specific matters including:

- a) the characteristics of development;
- b) the location of development; and
- c) the types and characteristics of the potential impact.

Schedule 3 identifies key selection criteria for screening Schedule 2 development. It should be noted that the EIA Regulations require EIA for qualifying developments where there are likely significant environmental impacts and not solely where there would be likely environmental impacts that could be mitigated. Where likely impacts have been identified and potential mitigation is known to be capable of reducing such impacts to less than 'significant' then such environmental consideration establish that an EIA is not required.

Characteristics of Development

The proposed development will not have significant urbanising effects given the previously developed nature of the site and the surrounding urban context, which comprises high-density development and tall buildings. The proposed development will improve a currently underutilised site and contribute significantly to LB Brent's wider regeneration aims for Wembley.

Whilst the proposed development will increase the amount of land use within the Site, this is to be expected given the Site's location within a designated town centre and growth area, the general development patterns in the immediate context and the National Planning Policy Framework (NPPF) guidance to promote sustainable development and make the best use of land.

In view of the above, it is considered that although the proposals are likely to cause an impact, there will be no adverse characteristics of the proposed development. The individual particulars that are likely to be impacted are assessed below.

Flood Risk

The Site is located within Flood Zones 2 and 3 and therefore has a high probability of both fluvial and surface water flooding. Student bed spaces (vulnerable uses) will be located at first floor and above to reduce impacts from flooding.

A Flood Risk Assessment and Drainage Statement will be submitted as part of any planning application.

Landscape and Ecology

The Site currently comprises industrial units. The Site has no statutory or non-statutory ecological designations and there are currently no significant ecological features or areas of usable open green space on the Site. 9 Watkin Road is located adjacent to Wealdstone Brook which is a SINC of Borough Importance Grade II and contains dominant tree species.

The Proposed Development includes landscaping and planting at ground floor and on various roof terraces at the north and south blocks.

The proposals provide a significant uplift in ecological benefits through the soft landscaping proposals compared to the existing situation and the following documents will be submitted in support of the application:

- Arboricultural Impact Assessment;
- Landscaping Strategy and Plans; and
- Preliminary Ecological Assessment.

Heritage, Archaeology and Visual Impact

The Site does not lie within or near a Conservation Area or an Archaeological Priority Area. Brent Town Hall, approximately 570 m north of the Site is Grade II listed. Wembley Arena (formerly the Empire Pool), approximately 470 m to the south-west of the Site are Grade II listed buildings. The closest scheduled monument to the Site is a 'Medieval moated site, 454 m south-west of Sudbury Golf Club House', which is approximately 3.2 km to the south west of the Site. It is also close to the National Stadium Wembley which is subject to Local Plan policies seeking to protect longer distance views to it and its arch. Therefore, it is not anticipated that the Proposed Development will pose a risk to any heritage or archaeological assets, however an Archaeological Report will be submitted in support of the application.

The surrounding area has witnessed significant urban development and is of a high density character. It is not considered the proposed development will have significant adverse environmental effects on townscape. The impact of the scale and height of the proposals will be assessed through the Design and Access Statement and Heritage, Townscape and Visual Impact Assessment.

Air Quality

The Site is located within the Brent Air Quality Management Area; however, the Proposed Development is not anticipated to have any negative effect on Air Quality. An Air Quality Assessment will be submitted in support of the planning application, taking account of the car-free development and proposed heating system, the quality of air around the development site and the impacts of the construction phase of development.

Contaminated Land

The Site is located within a historically industrial area and is currently used for industrial purposes. The Site is not known to be contaminated and it is not considered that future residents will be impacted in regards to contamination. However, a Phase 1 Ground Survey will be submitted in support of the planning application to demonstrate this.

Noise Pollution

As the Proposed Development involves residential dwellings, appropriate criteria will be proposed for environmental noise intrusion based on recommendations given within BS 8233:2014 "Sound Insulation and Noise Reduction for Buildings – Code of Practice" alongside local guidance included within Brent's planning policies. Construction guidance capable of meeting the requirements will also be met.

A Noise Impact Assessment (including Vibration Assessment) will be submitted in support of the planning application.

Transport and Highways Impact

The Site has a PTAL of 4 and is located in close proximity to Wembley Park Underground Station (Jubilee and Metropolitan lines) and Wembley Stadium train station (Chiltern Railways), and a number of bus stops Fifth Way and Engineers Way. The Proposed Development will be car-free, excluding disabled parking, and will meet the London Plan requirements for cycle parking standards. In addition, the Site is located in close proximity to a number of services and amenities within Wembley Park.

Therefore, the Site is located in a highly sustainable location and the Proposed Development will not negatively impact the existing highway network. This will be evidenced through a Transport Statement (including Healthy Streets Assessment) and Draft Travel Plan which will be submitted in support of the planning application.

Daylight and Sunlight

The proposed development's potential impact on daylight and sunlight will be considered for neighbouring properties. The scheme has been designed with access to daylight and sunlight kept in mind from the outset, and a Daylight, Sunlight and Overshadowing Assessment will be submitted as part of the planning application.

Climatic Factors

No electromagnetic radiation, heat or energy releases are expected other than those associated with normal construction operations and activities. Sustainable design and construction will be a key aspect of the proposals, ensuring compliance with regional and local planning policies. The following documents will accompany the planning application:

- Energy Statement, including BREEAM Pre-Assessment;
- Sustainability Statement;
- Overheating Assessment;
- Wind and Microclimate Assessment;
- Whole Life-Cycle Carbon Assessment; and
- Circular Economy Assessment.

Major Accidents

The risk of accidents in association with the development is considered to be negligible and to have no significant environmental bearing or effect, and that the risk of such accidents / disasters will be considered throughout the design development and construction of the scheme, thereby preventing any likely significant effects.

A Fire Statement will be submitted in support of the application and demonstrate how the design of the scheme seeks to reduce the risk of major accidents in relation to fire.

Lighting

Lighting will be designed carefully in accordance with relevant standards and these details are likely to be secured by condition resultant of the grant of planning permission.

Socio-Economic

The proposed development will create significant benefits to local employment through the creation of temporary jobs during construction and an uplift in employment generation through the re-provided high-quality commercial floorspace. The new residents will also generate economic growth within the local area through expenditure.

Further information will be provided through the Planning Statement.

Telecommunications

Whilst the proposed development comprises two tall buildings, it is not considered that telecommunication signals will be significantly adversely effected due to the surrounding scale and massing of development.

A TV / Radio Reception Assessment will be submitted as part of the application to demonstrate this.

Location of Development

For any given development proposals, the more environmentally sensitive the location, the more likely it is that the effects will be significant and will require EIA. Certain designated sites are identified in Part 1 of the Regulations as “sensitive areas” where the criteria in the second column of Schedule 2 do not apply there. Sensitive areas comprise: Sites of Special Scientific Interest (SSSI), National Parks, The Broads, World Heritage Sites, scheduled Monuments, Areas of Outstanding Beauty (AONB) and European Sites. The Site is not located within a “sensitive area” as defined by the EIA Regulations.

The Site is not subject to any environmental or ecological designations and neither is it located nearby any environmentally sensitive geographical areas which could be affected by the development.

The existing Site and its surroundings are previously developed brownfield land and therefore it is not considered that the Proposed Development will have significant urbanising effects. The redevelopment of the underutilised Site can contribute significantly to the wider regeneration of Wembley Growth Area and the Wembley Opportunity Area.

Taking into account the above and the submission of appropriate reports with the planning application, it is considered that the geographical location for the Proposed Development is appropriate.

Characteristics of the Potential Impact

The EIA Regulations require an EIA for qualifying developments where there are likely significant environmental impacts and not solely where there would be likely environmental impacts that could be mitigated. Potential impacts have been identified at this Site and mitigation measures have been incorporated into the design to reduce such impacts to less than “significant”. The necessary assessments and technical reports will be submitted as part of the application to demonstrate this.

Given the nature, location, design and incorporated mitigation of the Proposed Development, it is therefore considered that the proposals would not have any significant effects on the environment in relation to Schedule 3 of the Regulations.

In support of this, and both having reviewed LB Brent’s local validation checklist and agreeing a list of deliverables at pre-application stage, the following technical reports and assessments will be submitted with the forthcoming planning application:

Reports/Assessments to be Submitted in Support of Application
Planning Application Forms, including Certificates
CIL Additional Forms
Covering Letter
Planning Statement
Site Location Plan
Existing Floor Plans, Elevations and Sections
Proposed Floor Plans, Elevations and Sections
Design and Access Statement
Landscape Strategy and Drawings
Land Contamination Assessment
Air Quality Assessment (including Air Quality Neutral Assessment)
Noise Impact Assessment
Preliminary Ecological Assessment
Energy Statement, including BREEAM Pre-Assessment
Circular Economy Statement
Whole Life-Cycle Carbon Assessment
Sustainability Statement
Overheating Assessment
Transport Statement, including Healthy Street Assessment and Draft Travel Plan
Student Management Plan
Daylight, Sunlight and Overshadowing Assessment
Flood Risk Assessment
Drainage Statement
Heritage, Townscape and Visual Impact Assessment

Archaeological Report
Wind Microclimate Assessment
Arboricultural Impact Assessment
TV / Radio Reception Assessment
Fire Statement
Statement of Community Involvement
Section 106 Draft Heads of Terms

Conclusion

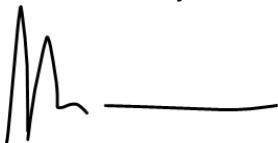
The Proposed Development at the Site has been assessed under EIA Regulations, taking account of the location and characteristics of the development and any potential significance for cumulative impacts. Following consideration of the Proposed Development at the Site, and within the context of the Regulations, it is deemed that the Proposed Development will not give rise to significant environmental effects both individually and cumulatively. This is due to:

1. The Proposed Development is not located within a “sensitive area” as defined by the Regulations;
2. The Site is not of more than local or neighbourhood significance;
3. The Site is brownfield and previously developed land, in accordance with the definition within Annexe 2 of the NPPF; and
4. The Proposed Development, subject to the relevant mitigation and appropriate assessments, is not considered to have significance effects on the environment for the purposes of the Regulations.

Therefore, it is concluded that an Environmental Impact Assessment is not required.

Section 6 of the Regulations states that the Council shall determine a Screening Opinion within 21 days of the date of receipt of a request. I trust that you have all the information you require to determine this request within the required time period. If, in the interim, you have any queries please do not hesitate to contact Daniella Marrocco (daniella.marrocco@rokplanning.co.uk) or myself at this office. I look forward to your formal acknowledgement of this request.

Yours faithfully,



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