23 May 2022

Mr Toby Huntingford
Planning and Regeneration
London Borough of Brent
Brent Civic Centre
Engineers Way
Wembley
HA9 0FJ

Charles McClea
E: cmcclea@savills.com
DL: +44 (0) 238 071 3956

Savills
Mountbatten House
1 Grosvenor Square
Southampton
SO15 2BZ
savills.com

By email only: Toby.Huntingford@brent.gov.uk

Dear Mr Huntingford

TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (AS AMENDED) – REQUEST FOR AN EIA SCREENING OPINION – WEMBLEY EDGE, GLYNN'S SKIP HIRE, FIFTH WAY, WEMBLEY HA9 0JD

Savills (UK) Limited, on behalf of The V Fund Ltd, intends to submit a full planning application for the redevelopment of Glynn's Skip Hire, Wembley Edge, Wembley (the site), to provide up to 670 student accommodation units in blocks of up to 14 storeys in height and up to 4,200 sqm of employment floorspace (Class E (g)(ii) and (iii)) at ground and first floor level.

Prior to the submission of the planning application, we formally request the Planning Authority's Screening Opinion pursuant to Regulation 6 of the Town and Country Planning (Environment Impact Assessment) (EIA) Regulations 2017 (the EIA Regulations).

In accordance with Regulation 6(2) please find enclosed:

- A description of the development, including the physical characteristics and location of the development
- A description of the aspects of the environment likely to be significantly affected by the development
- Where information is available, a description of any likely significant effects of the proposed development on the environment
- A plan sufficient to identify the land

The Site

The site comprises an elongated parcel of land approximately 0.6 hectares (ha) in size. As shown on the enclosed Site Location Plan (Drawing 1557-BUJ-ZZ-GF-DR-A-0001) the site is divided by Fifth Way, with the larger parcel to the south and a smaller parcel (circa 0.15ha) to the north. Access to the site is achieved from Fifth Way.

The site currently contains a number of industrial buildings of varying sizes associated with the waste transfer and processing operations of Glynn's Skips. External storage and processing areas are located around the buildings. The northern part of the site (to the north of Fifth Way) accommodates a number of shipping containers and container style buildings, as well as areas of storage and hard standing. The site is enclosed by fences and neighbouring buildings which abut the site on the east and west sides at the southern end of the site.

The surrounding land uses are varied and have been subject to significant re-development and transformation in recent times. Neighbouring the site to the west is the recently developed Pavilion Court (part of the Kelaty House development) which offers private student accommodation and serviced apartments. Arch View House (former Cannon Trading Estate) is also located to the west which provides further student accommodation. Within the existing and emerging context of the site, further residential uses are present and proposed. The

surrounding land uses to the east and north of the site are predominately commercial and industrial and the site is adjacent to Wembley Strategic Industrial Land (SIL) which is identified as a key employment land. Wembley Stadium is located approximately 250m to the south west of the site at the nearest point.

The Public Transport Accessibility Level (PTAL) rating of the site is three, which indicates moderate accessibility to public transport options. The Wembley area generally benefits from good public transport accessibility and is connected to Central London via a range of public transport systems. The Metropolitan, Jubilee and Bakerloo underground lines run from Wembley Central and Wembley Stadium station runs an over ground line (approximately 1.5km and 0.9km south west, respectively), reaching Central London in circa 10-15 minutes. Wembley Park Station is located approximately 0.6km north west.

There are no local or statutory listed buildings within the site and it is not located within a Conservation Area. There are limited heritage assets within close proximity of the site, however the closest of note are:

- Grade II listed – Wembley Arena (formerly the empire pool), approx 0.6km west
- Grade II listed – 3 K6 Telephone Kiosks, approx 0.8km west
- Grade II listed – Brent Town Hall, approx 0.8km north

The site does not contain any ecological designations and is considered to have low ecological value, due to being previously developed brownfield land within an urban environment.

The Environment Agency (EA) Flood Map for Planning shows the site is located within Flood Zone 1 (land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding). The site is also a West London Waste Plan protected site.

Planning Context

The principal use for student accommodation is supported by the site's location within the Wembley Growth Area under policy BCGA1 and site allocation BCSA9: First Way of the Brent Local Plan (Adopted February 2022).

Site Allocation BCSA9: First Way of the Brent Local Plan relates to the site. The site allocation also identifies the site for mixed-use development. The allocation requires development to seek the maximum re-provision of industrial uses and, in the event that waste cannot be accommodated in the development, suitable capacity for the waste function to be provided elsewhere.

The Design Principles require that on-site industrial premises should support the amenity of both residential and industrial uses to ensure their long-term compatibility. The proposed flexible E (g)(ii)(iii) Class employment uses would support the proposed student accommodation on site and the adjacent developments. The uses would support the creation of active frontages to Fifth Way and to the east-west connections through the site.

Under Policy BCSA9 it is noted that the development should provide a transition of heights and mediate between the taller schemes coming forward immediately east of the stadium and the Strategic Industrial Land that makes up Wembley Stadium Industrial Estate.

<u>Waste usage</u>

Policy SI9 of the London Plan states that existing waste sites should be safeguarded and retained in waste management use and the loss of waste sites will only be supported where appropriate compensatory capacity is made within London.

The practical capacity of the site has been determined and agreed with the Council as part of pre-application discussions as 29,500 tonnes per annum. A review of potential offset capacity has been undertaken which concluded that approximately 103,000 tonnes could be accommodated on two sites within Brent which would compensate for this loss.

Proposed Development

The proposed development involves the demolition of the existing buildings on site and redevelopment to provide up to 670 units of student accommodation in blocks of up to 14 storeys in height, and up to 4,200 sqm of commercial floorspace (Class E). These are the maximum quantum of development being considered and forms the basis of the EIA Screening considerations within this letter.

Whilst design work is currently ongoing, illustrative designs are presented within Figures 1 and 2. On the northern parcel of land, a block of 14 storeys is proposed (+88.5 AOD), containing employment space at ground and first floor level; internal student amenity space and student units at first floor level; and student units above. On the southern parcel, a lower-scale podium is proposed containing employment space at ground/ first floors with student uses above (in blocks up to a maximum of +79.0 AOD). The redevelopment proposals seek to provide high quality new student accommodation and amenity space.

The student housing is expected to be car free and cycle stores will be provided to meet the London Plan requirements for cycle storage provision.

An Illustrative Site Layout is provided in Figure 1 and Illustrative Section Plan is shown in Figure 2.

Figure 1: Illustrative Site Plan

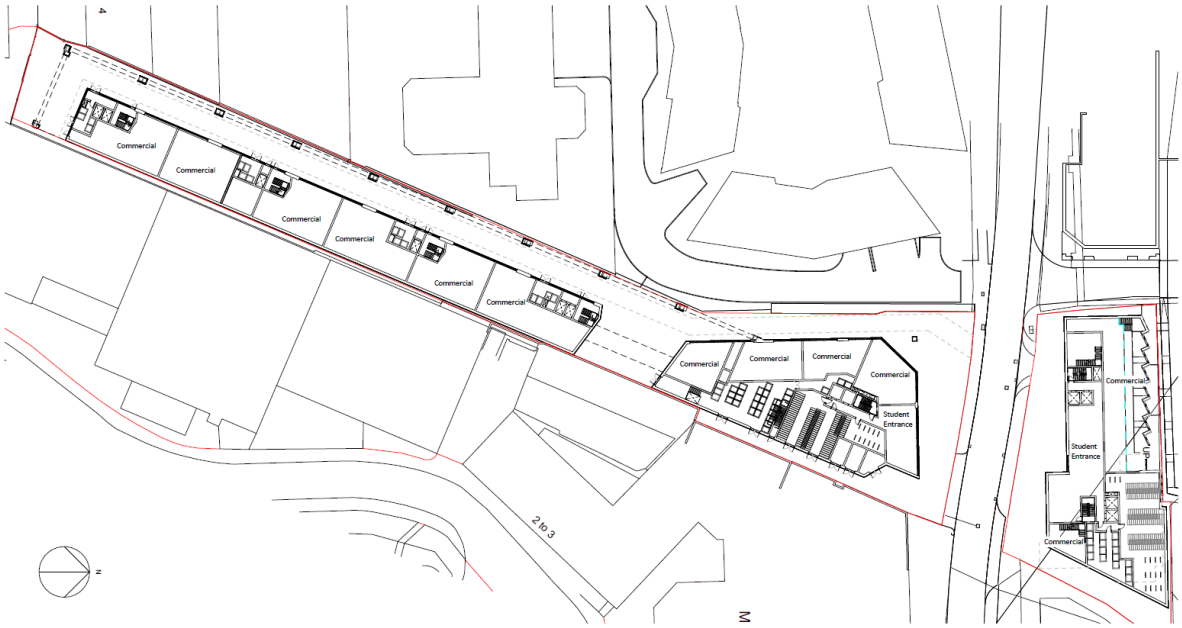

Figure 2: Illustrative Section Plan

EIA Screening Process

Development that falls within Schedule 1 of the EIA Regulations always requires EIA and is referred to as 'Schedule 1 development'. Development listed in Schedule 2 that is located in a 'sensitive area' (as set out in Regulation 2(1)), or exceeds one of the relevant criteria or thresholds given in Schedule 2, is referred to as 'Schedule 2 development'. Not all 'Schedule 2 development' will require an EIA, only the developments likely to have significant environmental effects due to its size, location or nature. Development that requires EIA is referred to as 'EIA development'.

As set out in the below table, the proposed scheme is not Schedule 1 development, but falls within the description in Schedule 2 Part 10(b) 'Urban Development Projects'. The proposed development is not located within a sensitive area but would exceed the relevant criteria in Schedule 2 of more than 150 dwellings (on the basis the student accommodation can be considered analogous to a dwelling house for the purposes of EIA Screening). Therefore, the proposed development would constitute EIA development if it is likely to result in significant environmental effects.

The Planning Practice Guidance (PPG) provides indicative thresholds to assist in the determination of whether a project is likely to have significant environmental effects. For urban developments such as this, these indicative thresholds state that "*Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination*". The PPG also defines 1,000 new dwellings as a suitable threshold, which is substantially above the development proposed.

When applying the PPG 'indicative criteria and thresholds' for Schedule 2 Part 10 (b) projects, consideration must also be given to whether the proposed development would have significant urbanising effects in a previously non-urbanised area. On the basis that the site is a developed brownfield site and is situated within an urban area with multiple developments of a similar nature to the proposed, the delivery of the proposed development is not considered to result in any significant urbanising effects.

Therefore, given the site is not located within a sensitive area (as defined by the EIA regulations) and, for the reasons described below, significant effects are not considered likely, the proposed development is not considered to constitute EIA development. This is in line with relevant EIA guidance provided in the PPG which states that "*only a very small proportion of Schedule 2 development will require an Environmental Impact Assessment*" (Paragraph: 018 Reference ID: 4-018-20170728). The assessment and consideration of environmental matters related to the proposed development can be appropriately addressed through the planning application process.

Application Thresholds	
i. Does the Proposed Development fall within Schedule 1 (Y/N)?	No
ii. If yes, what is the applicable description?	N/A
If yes, the proposed development automatically requires EIA	
iii. Does the proposed development fall within Schedule 2 (Y/N)?	Yes
iv. If yes, what is the applicable description?	10(b) Urban Development Project
v. Is any part of the proposed development to be carried out in a defined Sensitive Area (see Regulation 2(1))	No
vi. What is the applicable threshold/criteria in Schedule 2?	The development includes more than 150 dwellings; or 1ha of non-residential development; or the overall area of the development exceeds 5ha.
vii. Does the proposed development meet/exceed the applicable threshold (Y/N)?	Yes, the proposed development includes more than 150 dwellings (student accommodation is

	considered analogous to a dwelling house for the purposes of EIA Screening)
If yes to (iii) and then (v) or (vii) the proposed development will require EIA if it is likely to have significant effects on the environment.	

Possible effects on the environment

The following information has been prepared with reference to the selection criteria for screening Schedule 2 development, provided in Schedule 3 of the EIA Regulations:

1. Characteristics of development (a) – (g) (of the Regulations)
2. Location of development (a) – (c) (of the Regulations)
3. Characteristics of the potential impact (a) – (h) (of the Regulations)

Features of the proposed development and any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment have been identified as per the PPG guidance at Paragraph 023 Reference ID: 4-023-20170728.

The applicant has a good understanding of the possible environmental effects of the proposed development and, as such, the illustrative layout of the proposed development includes inherent environmental mitigation to respond to the constraints and potential impacts on and off site.

In the absence of inherent and additional mitigation and in advance of any judgments of the significance of individual effects, the possible environmental effects of the proposals are considered to be:

- Daylight and overshadowing – local impacts on surrounding human receptors through the comprehensive redevelopment of the site
- Air quality – from emissions and dust generated during the construction phases and emissions resulting from the operation of the proposed development
- Noise and vibration – from the construction and operational phases of the proposed development
- Townscape and visual effects – near and far-field views of the buildings from the road network, public open space, public rights of way, residential properties and protected views of Wembley Stadium from the increase in height and massing
- Hydrology and flood risk – the risk of flooding caused by the development and the management of flood risk both within the site and beyond its boundaries
- Social and environmental effects – including the creation of new employment during construction and introduction of additional residential (student accommodation) receptors into the site
- Transport – the traffic movements associated with the proposed development on the local road network as a result of the construction phase
- Biodiversity and ecology – the effects on existing biodiversity and ecology from the comprehensive redevelopment of the site and introduction of new landscaping
- Risks to human health – the risk of accidents or disasters resulting from the construction and operational phases of the proposed development
- Cultural heritage – the effects of the proposals on the setting of nearby heritage assets and non-designated heritage assets
- Climate change – the effects on climate through GHG emissions during the construction and operation phase
- Ground conditions – the effects on ground conditions through the mobilisation of potential contaminants during the construction phase

1. Characteristics of development	
a) The size and design of the whole development	The proposed development will deliver up to 670 student accommodation units in blocks of up to 14 storeys in height (+88.5 AOD), and up to 4,200 sqm of commercial floorspace (Class E (g) (ii) (iii)) (to be located on the lower floors). The illustrative preliminary layouts show the proposed development will consist of three main blocks, one situated to the north of Fifth Way and two main blocks linked together in the south. Current illustrative proposals include a range of taller buildings, with the tallest block (up to 14 storeys) located in the northern part of the site, and blocks of up to 12 storeys in the south. Building heights vary across the proposed development, with lower buildings interspersed between taller blocks. To the south of Fifth Way, the blocks will be located along the eastern boundary of the site, creating a step back from the neighbouring properties to the west. The properties to the west are considered to be of higher sensitivity than the properties to the east, as these consist of student accommodation and include windows overlooking the site. The properties immediately to the east are commercial units which do not overlook the site. As such, the proposed massing responds to the surrounding sensitive receptors. The existing built form on the site consists of industrial units associated with the current waste use and external processing areas and areas of open storage. The maximum height of the existing units on site is equivalent to approximately five to six storeys. As such, the proposed development would represent an increase to the general height of development on site. However, whilst the current proposals include elements which exceed the current heights on the site, the wider surrounds include buildings at or greater than 14 storeys. Therefore, the proposals are in keeping with the immediate surrounds. In line with the Site Allocation, the proposed massing will provide a transition between the new development and adjacent industrial uses. Public realm will be located around the proposed buildings to the east and south of the site and will consist of both general shared surface and commercial yard space associated with the proposed commercial floor space. The footprint of the proposed new buildings will be similar to the built form within the immediate and wider surrounds. Given this context and the existing use of the site, the magnitude of potential environment impacts is not considered likely to result in significant effects. The quantum of development sought at the site makes efficient use of the land and allows for additional areas of public realm. Taking the above into account, the size and design of the proposed development is considered to be appropriate for the location and unlikely to result in any significant environmental effects.
b) The cumulation with other existing development and/or approved development	In respect of potential cumulative effects with other development, PPG advises that "*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"* (ID 4-024-201740728). Consideration has been given as to whether there is potential for likely significant effects to occur through the combination of the proposed development with other existing or approved developments. Given the site's location within the Wembley Growth

	Area, there are a number of consented developments situated within the surrounding area, particularly with regards to the Wembley Park Masterplan. Outline planning permission (Ref: 15/5550) was granted in 2016 for the redevelopment of 15.87ha of land surrounding the Wembley Stadium as part of the Wembley Park Masterplan. The Wembley Park development will deliver the majority of the residential-led mixed-use development within the Wembley Growth Area. Whilst much of this has been built out already (and therefore forms part of the baseline consideration), other consented developments have been considered as part of the cumulative assessment for this screening. This includes (not exhaustive): ▪ Ref: 20/2033 – 493 Units (Up to 21 Storeys) – Adjacent to the site to the north and north west – Granted on 22 March 2022 ▪ Ref: 20/0587 – 175 Units – approx 550 metres from the site– Granted on 13 September 2021 ▪ Ref: 21/2424 – 282 Units (up to 21 Storeys) – approx 450 metres from the site – Granted on 22 October 2021 (Reserved Matters Application in relation to Outline 15/5550) ▪ Ref: 21/2517 – 487 Units (Up to 27 Storeys) – approx 450 metres from the site – Granted on 22 October 2021 (Reserved Matters Application in relation to Outline 15/5550) ▪ Ref: 18/4767 – 600 Units (Up to 24 Storeys) – approx 150m from the site – Granted 20 April 2020 ▪ Ref: 20/3914 – 457 Units (Up to 28 Storeys) – approx 2.6km from the site – Granted 29 October 2021 Given the size and proposed massing of the surrounding developments and the proposed development, and the urban and built up location, significant cumulative effects are not considered likely. For example, given the urban location, many of the surrounding proposals are promoted as “car-free”, providing minimal car parking spaces and promoting suitable transport options. As such, trip rates generated during the operational phases are not considered to be significant or put strain on the surrounding road network. Upon review of the application documents for surroundings developments, it is noted that, through the adoption of appropriate mitigation, limited significant environmental effects from these developments have been identified (in isolation or cumulatively with surroundings proposals). For example, the Environmental Statement prepared for Euro House (Ref: 20/2033) adjacent to the site, concluded that no significant adverse effects were likely in relation to all environmental topics, with the exception of daylight and overshadowing (noting that this scheme proposed buildings up to 21 Storeys) and Climate Change. Furthermore, with regards to drainage, each development manages its respective impact through suitable drainage design to ensure no adverse effects on the water network. As such, cumulatively, the proposed development is not considered to cause any greater or significant effects. Given the similar nature of the proposed development and the urban context of the area, it is not considered that significant cumulative effects will occur. The potential for significant cumulative effects caused by the combination of a number of impacts on a particular receptor (taking into consideration impacts at both the construction and operational phases), which, acting together, may cause a greater significant impact collectively than individually, has also been considered. Based upon the considerations presented within this table and with the implementation of standard mitigation measures, significant cumulative effects related to the overall combined impacts are considered to be unlikely.

c) The use of natural resources, in particular land, soil, water and biodiversity	Redevelopment of the site would require the use of a range of common natural and man-made construction materials and resources for the build and fit-out of the scheme. Consideration of the potential impacts from the use of these resources is presented below. Some change to the levels on the site might be required, which could consist of lowering the site in line with adjacent land uses. However, as the site is previously developed land and given the size of the site and scale of any earth works, it is not envisaged that any changes to the site levels will be significant changes. As such, significant amounts of natural resources are not expected to be required in order to create a suitable development platform. **Water** During the construction phase, certain activities require water, including some common mitigation measures used to control potential demolition and construction impacts, such as dust dampening. However, taking into account the scale and nature of the proposed development, significant effects related to consumption are not considered likely and would be suitably controlled through the implementation of standard best practice construction techniques (to be set out in a Construction Environmental Management Plan (CEMP) and secured via planning condition). During the operational phase, water consumption associated with the commercial and student accommodation use will occur. However, this is not considered to be of a magnitude which would lead to any significant strain on the local or regional water resource. Furthermore, the proposed development provides an opportunity to promote sustainable water use through design and fit out of the scheme, for example through the incorporation of efficient water fixings. In accordance with London Plan Policy SI 5, it is proposed the student accommodation would be designed to minimise internal water consumption. **Biodiversity** As a previously developed site, the dominant habitat is the existing buildings which cover a large proportion of the site. There are no designated ecological sites either on or in proximity to the site. Some existing structures may provide opportunities for nesting birds and roosting bats, however, given the current use these are not considered to be valuable or suitable in that regard. The site does not contain any trees or notable vegetation and, as such, is considered to be of very low ecological value. Overall, the proposed development, including the demolition of the existing buildings, is not considered to cause the loss of any significant or important habitats in the area, or adversely impact the biodiversity resource. Once operational, vehicle movements on site and noise and light impacts associated with the proposed development could potentially affect ecological receptors across the wider area in the absence of mitigation. Given the site is already in commercial use and due to the urban nature of the local area, such receptors are considered to be extremely limited. However, the emerging design will incorporate embedded mitigation through the provision of landscaping and new planting (mainly in the form of landscaped roof gardens) which will reduce the impact on biodiversity to ensure that significant adverse effects are avoided. Moreover, there is scope for biodiversity net gains to be delivered compared to the existing situation. It is therefore considered that the development proposals would not lead to significant effects in terms of biodiversity resource.

	Soil and Minerals The site is within a built up urban environment and, with reference to MAGIC.gov.uk, is not designated as Best and Most Versatile Agricultural Land. Therefore, the proposed development will not have a significant effect related to soils or the availability of agricultural land. The site has not been identified or allocated for mineral extraction and is not situated within a mineral safeguarding area. Furthermore, if any minerals were present it would not be feasible to extract these given the size and location of the site, therefore the proposed development will not sterilise this resource or have a significant impact on the region's mineral provisions. **Use of Materials** As with any modern development project, through the careful selection of materials and best practice construction methods, the consumption during construction and operation will be minimised. Overall, given the scale and nature of the proposed development, significant environmental effects related to the use of natural resources is considered unlikely.
d) The production of waste	**Construction Demolition and Excavation (CD&E)** During the demolition and construction phase, waste will be generated on-site with the highest quantities of waste typically generated during demolition and earthwork. As noted above, the proposed development would result in the loss of an existing use site (which is safeguarded under Policy S19 of the London Plan). Therefore, the current waste site capacity of 29,500 tonnes would need to be compensated for and identified, and its delivery secured as part of any planning permission. With reference to the Mayor of London Waste Map and through a review of waste sites within the borough, it has been identified that there is sufficient waste management capacity within London Borough of Brent (LBB). As such, the loss of the site as waste facility would not result in any significant impacts in terms of waste capacity within the Borough. Given the sufficient availability of waste infrastructure/ facilities to manage the CD&E waste types, it is unlikely that there will be any significant impacts on the local waste infrastructure as a result of the waste generated during these activities. During the construction phase, best practice construction methods will be adopted, controlled via a CEMP, to ensure that construction waste is appropriately managed, in compliance with the waste hierarchy, including on-site methods of segregation, refuse and recycling wherever practicable. **Operational waste** The proposed student accommodation will result in the generation of household waste which is currently not part of the waste generation on site given the existing uses. It is anticipated that operational waste will mainly comprise household and recyclable material. The proposed commercial uses (within Class E (g)(ii)(iii)) are not considered to give rise to unusual volumes of waste. The nature of the proposed development is such that excessive or abnormal waste generation is unlikely to occur. Therefore, the potential effects of waste arisings during the operational phase are not considered to be significant. Furthermore in line with policy SI 7 of the London Plan, methods to promote a circular economy and reduce waste will be adopted where possible.

	Alongside appropriate storage, this waste will be collected and managed in accordance with all relevant legislation and guidance. Following collection, the waste would be suitably disposed of or recycled by, or on behalf of the waste disposal authority. The method of treatment of the waste arising is commonplace and would not necessitate an EIA to evaluate its impact.
e) Pollution and nuisances	**Traffic** The planning application will be accompanied by a Healthy Streets Transport Assessment (TA). During the demolition and construction phases, a higher number of HGVs will be required to access the site and use the surrounding road network to remove and import materials. This may exceed the current baseline, although given the current use on site, there is already regular access to the site by HGVs for the waste operations. As such, any increase during construction and demolition is likely to be minor and would be temporary in nature. Furthermore, vehicle movements can be controlled through a routing agreement with restrictions imposed over timings as appropriate. A temporary impact could arise on local traffic which could affect people who live and work in the area. However, the site is within an area with well-established road and travel infrastructure. Therefore, with the implementation of standard control methods, significant environmental effects are not considered likely during demolition and construction phase. This will be reflected within an agreed Construction Logistics Plan (CLP). It is currently envisaged that the proposed development will be predominately car free (this is considered to be in keeping with the requirements of the student end users given the urban location of the site). There will be some vehicle movements associated with servicing, pick up and drop off, disability parking and the ground floor commercial uses on site. However, given the current use on site, the overall vehicle movements are unlikely to result in any significant effects. Taking this into account alongside the good PTAL rating of the site (PTAL of 3), the proposed development is not likely to result in any impacts on the local road network. The Travel Plan will include measures to enhance travel by foot, cycle and public transport. The overall scale and nature of the proposed development is not considered likely to result in significant adverse effects on traffic or transport. Consequently, it is not considered that the scheme warrants an EIA on transport grounds. **Noise** During the demolition and construction phases, construction traffic and machinery will generate new sources of noise and vibration. The closest noise sensitive receptors to the site are the student accommodation blocks to the east. Noise and vibration associated with the demolition and construction phases of the development have the potential to impact upon these receptors. However, impacts will be temporary and can be limited to day time hours via commitments in the anticipated CEMP secured through planning conditions. Given the current use on the site, the noise environment already consists of HGVs and commercial plant. As such, construction activities are not considered to alter the current background noise levels or change the characteristics of the sound scape to any significant degree. Although the construction works will be carried out during the day time, some equipment (such as power generation plant for security or lighting) may be required to run at night. All plant will be selected, maintained and positioned to minimise potential noise impacts. It is therefore considered that demolition and construction impacts can be appropriately mitigated through the use of appropriate equipment

	and standard best practice methods to ensure no significant effects occur. During the operational phase, background noise levels within the vicinity of the site are likely to decrease from the existing baseline, as the proposed uses are not associated with significant noise generation and the existing waste uses will cease operation. As stated above, vehicle movements are not expected to materially change, therefore it is considered unlikely that traffic movements, and the related impacts, will cause significant environmental effects or nuisances. **Air Quality** An Air Quality Assessment will be undertaken to support the planning application. The key considerations for air quality relate to impacts on existing receptors due to emissions associated with demolition of the existing buildings and subsequent construction and operation of the proposed development. The other key consideration is the suitability of the site for its proposed use. The site is located within the Brent Air Quality Management Area (AQMA) which is borough-wide, declared due to exceedances of the annual mean Air Quality Strategy (AQS) objective for nitrogen dioxide (NO_2) and Particulate Matter PM_{10}. Elevated concentrations of NO_2 are primarily due to emissions from road vehicles. While there is likely to be some dust creation during demolition and construction, this would be controlled by appropriate planning conditions. Furthermore the existing activities associated with the waste uses on site are also dust generating activities, therefore the impacts of the proposed development are not considered to represent a significant change from the current baseline. Through the adoption of standard best practice measures, the likely residual impacts of the proposed development are not considered to be significant in accordance with the IAQM guidance. Mitigation measures such as implementing a dust management plan, ensuring screens are placed around dust producing activities and using dampening techniques would further reduce the potential impacts. Air quality impacts from construction vehicle emissions can be reduced through best practice construction techniques, such as ensuring that vehicles are not left idling. Construction plant emissions and non-road mobile machinery (NRMM) emissions are not anticipated to be significant due to the scale of the development. The above can be implemented and managed though the production of a CEMP. During operation, it is currently anticipated that the proposed development will not result in a material change in local traffic movements and may lead to reductions in overall vehicle movements. Therefore, air quality impacts associated with vehicle movements are not considered to be significant. In accordance with policy, the proposed development will be at least air quality neutral. In terms of site suitability, given the proposed development is consistent with the surrounding uses and is allocated in the adopted Local Plan for residential-led mixed use development (Site Allocation BCSA9), it is considered to be a suitable location for development of this nature and air for future residents within the proposed development will be acceptable. Overall, it is considered unlikely that the proposed development will result in air quality effects that are deemed significant in EIA terms.

	Ground conditions During the construction phase of the proposed development, there will be a requirement to build new foundations to ensure structural integrity. This activity could mobilise any contaminants present, exposing them to potential pathways (e.g. disruption of the water table) from which human health (future site occupiers) and controlled waters (groundwater/ surface water bodies) could be affected by contaminated soils and groundwater. Construction workers may have direct contact with the subsoils during construction and, as such, there is a potential for ingestion, inhalation and dermal contact. Soils Ltd undertook a desktop and walkover study followed by an intrusive site investigation which was reviewed by OCSC in October 2021 and highlighted the key geotechnical and geo-environmental issues. This found that, although the previous waste uses on site have the potential to lead to ground contamination, the site investigations found that ground and groundwater contamination was not noted to be an issue on the site. Furthermore, as the proposed development involves hard landscaping the site, which would encapsulate the underlying soils and any potential contamination present, there would be no risk to the human health receptor when the development is completed. Therefore, it is considered that the nature of any potential contaminants is not likely to be unusually complex or hazardous that would pose any significant environmental or health risk. Standard best practice and mitigation methods (which would be secured through a CEMP) would ensure that potential impacts from the proposed development are fully understood and mitigated. As such, significant effects warranting assessment through EIA are not considered likely, and consideration of ground conditions can be suitably addressed (where necessary) through the planning application process. **Lighting (Including Daylight, Sunlight and Overshadowing)** The following potential effects with respect to daylight, sunlight, overshadowing, light pollution and solar glare have been identified: ▪ Temporary changes to daylight, sunlight, overshadowing and light pollution during the demolition and construction works ▪ Changes to the duration and quality of daylight and sunlight, as well as the incidence and duration of overshadowing experienced by surrounding sensitive receptors on completion of the proposed development ▪ Increased levels of light pollution from internal and external lighting schemes of the proposed development The key sensitive receptors to light and overshadowing impacts are the surrounding student accommodation units to the west. The introduction of buildings up to 14 storeys in height in close proximity to the surroundings will influence the light availability and shadow patterns in the immediate surrounds. In line with policy, the development will be designed to ensure sufficient daylight and sunlight within new and existing buildings is achieved, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity. Whilst the introduction of tall buildings to the site will impact on the immediate surrounds and the daylight and overshadowing patterns, when considering the emerging urban context of the site, the potential impacts to neighbouring buildings are considered to be within the intention and practical application of the BRE Guidelines and can be considered alongside the regeneration aspirations for the area. Therefore, it is not considered that significant environmental effects will arise. The scale of the proposed development and the anticipated design (e.g. taller elements

	located along the eastern boundary of the site to provide further distance between the neighbouring properties to the west) means that impacts would be confined to the immediate surrounds of the buildings. **Greenhouse Gas Emissions** The proposed development will result in greenhouse gas emissions from activities undertaken over its lifetime. In line with best-practice guidance presented by IEMA, all greenhouse gasses emitted to the atmosphere are considered significant, however the emissions associated with this proposed development are not considered likely to prevent the UK, GLA or Local Authority in meeting its current or future carbon emission reduction ambitions. Opportunities to minimise carbon emissions will be incorporated into the design through: ▪ Adopting best practice working and construction methods, administered and monitored through a detailed CEMP ▪ A 'fabric first' approach, low carbon heat generation, and zero-carbon ▪ Energy efficient systems – MVHR, LED lighting, smart controls Furthermore, the new buildings introduced will be compliant with current policies and standards in relation to energy efficiency and sustainability. Taking into account the above, implementation of suitable mitigation measures and the nature and scale of the proposed development, adverse effects related to greenhouse gas emissions sufficient to warrant an EIA are considered unlikely. In addition to this, connection to an existing heat network and opportunities to incorporate renewable technologies will be adopted where possible to further reduce GHG emissions. **Wind** The provision of tall buildings has the potential to influence the microclimate in which they are situated. At street level, wind may be reduced overall with the introduction of new built development acting as a barrier. However, urban developments can also cause an increase in wind locally due to the 'wind tunnel' effect in which air flow is funnelled through concentrated areas resulting in greater wind speeds in those areas. This has the potential to impact on human receptors in the surrounding streets. During the demolition phase, the removal of the existing built form and tall buildings currently surrounding the site could impact the wind environment on the site as it becomes more open. During the initial construction phase, whilst the scale of the proposed development remains in line with the current buildings, no effects are considered likely to arise given the change on site would be negligible at this point. During the later phases of construction and into the operational phase, when the proposed development is largely built out, the wind microclimate of the site and immediate surrounds will be influenced by the new massing. The magnitude of wind impacts is dependent upon the height of the buildings. The taller the building, the greater the displacement of air and therefore impact on the wind environment. However, given the maximum height of the proposed development (with several blocks likely to be under this maximum height), significant effects are not considered likely to arise.

	Through the use of embedded mitigation measures, the tall elements of the proposed development will be designed to ensure that significant effects relating to wind microclimate do not occur, and comfort criteria are met on and off site in relation to the proposed uses.
f) The risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge	The site's location within the UK is such that natural disasters, including those caused by climate change, are not considered to represent a likely risk to the proposed development. For example, it is considered that the likelihood of an earthquake with a magnitude sufficient to cause damage to buildings and/or loss of life occurring and impacting the site is extremely low. The proposed development will be designed in accordance with recognised and accepted best practice in terms of highway design, specification of drainage and current building regulations, to further reduce the susceptibility of the site to major accidents and/or disasters. It is considered that, whilst there is always a potential risk that an accident, fire or natural disaster could result in a significant environmental impact, this risk can be appropriately mitigated through embedded design measures and through compliance with statutory design guidelines. Therefore, significant effects are considered to be unlikely. The nature of the proposed development is such that it is not likely to give rise to a major accident or disaster. **Climate Change Resilience** Aspects of the proposed development such as the infrastructure and functionality of the building and users will be subject to current and future changing climates. Summers are likely to become warmer and drier, whilst winters are likely to be warmer and wetter. Opportunities to increase the resilience of the proposed development to climate change will primarily be incorporated into the design. It is therefore considered that the proposed development will be resilient to future climate scenarios and would not be vulnerable to any significant impacts as a result of climate change.
g) The risks to human health (for example, due to water contamination or air pollution)	During the construction phase, a temporary increase in HGV movements could present an increased accident risk on the local road network. However, given the scale of the development, the current waste uses (associated with HGV movements) and the implementation of temporary construction traffic controls, it is not considered that a significant risk will arise. Therefore, this consideration can be suitably addressed through the planning application process. During the operational phase, there is not anticipated to be any increase in traffic that would impact the safety of the surrounding road network. Furthermore, the location of the site within an urban environment means that pedestrian safety measures are well established in the area so that future occupiers travelling to and from the site will not be exposed to adverse or unusual accident risk. The nature of the development is such that future uses on site are not considered to result in risk to human health. As discussed above, the proposed development is not considered to result in significant impacts in relation to noise and air quality, therefore the risk to human health with regards to these environment conditions is also considered to be low.

2. Location of development	
a) The existing and approved land use	As described above, the site is currently used as a commercial waste site. As such, the proposed development represents the redevelopment of existing brownfield land. The proposed development is consistent with the surrounding land uses to the west and would not introduce any category of receptor which is not already present in the area.
b) The relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground **c) The absorption capacity of the natural environment**	In relation to criteria 2 (b) and (c), the site is not subject to any statutory environmental, landscape or heritage designations. Consideration is given below to potential environmental impacts by virtue of the site's location. Consideration has also been given to any high quality and scarce resources on and around the site which could be impacted by the development. **Townscape and Visual** The site currently has an urban character. At a site level, the townscape will change as a result of the new built form. However, within the context of the wider environment, given the existing urban character of the site and surrounds it is not considered that the proposed development would result in significant urbanising effects. The proposed development will result in an increase in built form and heights, therefore views of the site will change through the construction and occupation phases. The proposed development is consistent with the massing and urban grain of its surroundings and can be absorbed into the surrounding environment. Therefore, whilst there will be a visual change at some receptors, it is not considered these will be significant in EIA terms. Brent Council's adopted Local Plan identifies the Wembley Growth Area (in which the site is situated) as appropriate for tall buildings, and the site allocation (BCSA9) also identifies the site as appropriate for tall buildings. The site is within a Tall Building Zone in the Local Plan policies map. The Wembley area is subject to a number of protected views to conserve views of the stadium. Upon analysis of these views and the potential massing of the proposed development, it is considered that the proposals fit into the emerging context of the area and would not have any significant impacts to views of the stadium arch, particularly in the context of other new proposals in the area. Through careful design, the proposed development is expected to result in a direct beneficial effect, primarily experienced through the renewal and regeneration of the current site and improved public realm. Indirect effects will mostly be experienced in the visual contribution the proposed development would establish, altering the experience of the site and altering views within the wider townscape. Overall, it is not considered townscape and visual impacts will be significant in EIA terms. A Townscape and Visual Impact Assessment will be submitted as part of the suite of planning application documents. **Archaeology and Built Heritage** There are no designated heritage assets on the site and, as outlined above, there are limited listed buildings in the vicinity. The listed buildings in the wider area are disconnected from the site by considerable screening and development and the site is not considered to contribute to their setting. Furthermore, the emerging designs for the proposed development ensure a high quality of architecture for the proposed development and as such will represent an improvement of the site from its current use as a waste site.

	During construction, standard best practice working methods will be followed to ensure that, should any below ground non-designated heritage assets be discovered, appropriate mitigation fieldwork will ensure adverse impacts are avoided. Any potential environmental effects can be balanced by the public benefits of the scheme and avoided or minimised by the implementation of an agreed programme of archaeological mitigation fieldwork. The programme of archaeological mitigation will be drawn up in consultation with Greater London Archaeology Advisory Service (GLAAS), which provides development control advice in regard to archaeology to the local planning authority. **Ecology** The site does not contain any designated ecological assets and the surrounding area has very few designated and non-designated ecological sites. Given the distance between the site and other sites of ecological importance, it is not considered that significant environmental effects will arise as no ecological links currently exist. The introduction of new residents (student accommodation) to the area has the potential to increase recreational pressure on areas of ecological value within the surrounding area. However, given the scale of the proposed development this is not likely to be significant. Furthermore, the redevelopment of the site will provide ecology benefits compared with the existing baseline, through the provision of new landscaping. **Noise** The site is located in an area where the background noise levels are principally characterised by road noise and plant from commercial buildings. The surrounding land uses primarily consist of student and residential accommodation and commercial uses. The site is adjacent to strategic industrial land (SIL) identified as key employment area and it is understood that the immediately adjacent uses within the SIL to the east comprise of general storage, vehicle services, and wholesale businesses, which are not considered to be incompatible with student amenity. Given the urban location, the site is also situated in close proximity to rail infrastructure including overground lines. Wembley Stadium will be an occasional source of noise on match days. However, given the site is next to uses consistent with the proposals and has been identified for mix-use development (including student accommodation under Site Allocation BCSA9), it is established that it is suitable for the proposed development and reasonable acoustics conditions of future occupants will be maintained. The proposed development will introduce new uses to the site which are sensitive to noise (student accommodation). However, the new buildings will be designed and constructed with modern building materials; as such, it is considered that internal noise can be suitably managed to ensure that the relevant thresholds are met for the intended uses. With the appropriate standard mitigation employed to ensure future amenity, no significant effects are likely. **Flood Risk and Drainage** The Environment Agency (EA) Flood Map for Planning shows the site is located within Flood Zone 1 (land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding). Given the existing uses, it is established that it is a suitable location for the proposed development in terms of flood risk.

	A Flood Risk Assessment (FRA) will be undertaken to assess the level of flood risk posed to and from the Proposed Development during its operational phase. The assessment will be compliant with national and local guidance, including the NPPF and the PPG. The drainage strategy is expected to be designed to accommodate the 1 in 100 year plus climate change event and the discharge rate must be restricted to greenfield runoff. As the site is currently developed, the proposed development would not result in any material change in non-permeable surfaces on site. There are currently areas within the site susceptible to surface water flooding. Therefore, the proposed development would offer the opportunity to improve the on-site drainage from the current baseline through the implementation of SuDS. With the implementation of appropriate and established mitigation measures to be set out in the drainage strategy, this will ensure that no on site property flooding or increased off site flood risk will occur. The drainage strategy also will ensure suitable management of surface water quality. Therefore, significant effects in relation to flood risk are not considered likely. **Socio-Economics** There are likely to be some short term employment benefits during the construction period. Furthermore, direct and indirect jobs will be created from the student accommodation in use, which are likely to be beneficial in the local context. However, given the scale of the proposed development, significant effects are not likely to occur. The applicant would expect that an appropriate financial contribution could be secured, through the Borough Community Infrastructure Levy (CIL), to address any impacts on local education, community and health facilities.
3. Types and characteristics of the potential impact	
a) The magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);	The magnitude and spatial extent of the impact will be local in nature, both geographically and in terms of population that could potentially be affected. The site is currently developed and therefore the range and magnitude of potential impacts from the redevelopment proposed, are not expected to be significant above the existing baseline. Therefore, the site is considered to have the capacity to accommodate the level of development proposed.
b) The nature of the impact;	The proposed development is of a scale that the local highway network can sustain, and mitigation and safeguarding measures mean that no significant impacts are likely to occur. The site is currently developed, therefore the nature of impacts is not considered to change to a significant degree from the existing baseline.
c) The transboundary nature of the impact;	Impacts are unlikely to be transboundary, given the scale and nature of the development proposed. There is a potential for future occupants to travel from outside of the borough to the site for work, as well as from the site during work activities. Furthermore, as student accommodation, travel to and from the site from outside the borough will occur. However, notable effects on the local highway network are not anticipated.

d) The intensity and complexity of the impact;	The overall impact of the proposed development is predicted to be of a normal intensity and complexity for a scheme of this size and nature. As discussed above, any anticipated developmental effects can be managed effectively through common mitigation measures.
e) The probability of the impact;	All of the potential impacts and their probability are understood and predictable. With the implementation of standard best practice measures, none of the potential impacts are considered likely to result in significant effects.
f) The expected onset, duration, frequency and reversibility of the impact;	The potential for temporary impacts to arise during the construction phase of the project has been outlined above. However, these will be minimised through adherence to best working practices. The duration and reversibility of some proposed impacts, particularly in relation to townscape, would be considered permanent (but not significant) as the proposed development is intended to be a high quality, sustainable, long term construction and there is no expectation with regards to decommissioning. However, the magnitude of some of the impacts will reduce as planting and mitigation measures become established around the site. Once the development is operational, some impacts will be permanent, given the expected life span of the proposed development. However, these impacts are not considered significant in the context of other land uses in the immediate area.
g) The cumulation of the impact with the impact of other existing and/or approved development;	The possibility of cumulative impacts has been considered in association with selection criteria 1(b).
h) The possibility of effectively reducing the impact	As no significant effects are considered likely to arise, consideration of the probability of effectively reducing impacts is not determinative in this case. Nevertheless, as discussed above, the potential impacts associated with the proposed development can be mitigated through the use of best practice construction methods and the implementation of typical mitigation measures. During the construction phase, such measures would be controlled through a CEMP. The Transport Assessment, ecological surveys, Flood Risk Assessment and other technical reports, which will accompany the Planning Application, will identify appropriate mitigation measures for operational impacts that can be secured as part of the application submission, subsequent planning conditions and legal agreements. Whilst potential impacts have been identified, the nature of these are such that these are not considered likely to be significant and therefore would not trigger EIA.

Conclusions

The proposed development does not qualify as a Schedule 1 development and is not located wholly, or partly, within a 'sensitive area' as defined in Regulation 2(1). However, it does fall within the description of 'Infrastructure Projects 10(b) Urban Development Projects' within the first column of Schedule 2 of the Regulations and exceeds the thresholds in the second column, as the proposal includes more than 150 dwelling houses (student housing).

To determine whether the proposed development comprises EIA development, it is necessary for the Local Planning Authority to consider whether it is likely to have significant effects on the environment, taking account of the selection criteria in Schedule 3 of the Regulations.

Our assessment concludes that the characteristics and location of the development are unlikely to give rise to significant environmental effects, alone, or in accumulation with other developments. The proposed development consists of the redevelopment of an existing waste site to provide up to 670 student accommodation units in blocks of up to 14 storeys in height and up to 4,200 sqm of employment floorspace (Class E (g)(ii) and (iii)) at ground and first floor level. Whilst the additional uses proposed represent an intensification of use on the site, this will not introduce any different sensitive receptors into the wider area than are already present. Given its urban location and surrounding development, the proposed development is not considered to result in any significant urbanisation.

The proposed development will primarily consist of the same uses as the wider area. Therefore, the potential environmental impacts from the development are considered to be of similar nature to those already present and experienced by the surrounding environment and would not result in new or different effects that would warrant the need for an EIA. Additionally, as set out in this letter, with the implementation of suitable design alongside mitigation and avoidance measures, drainage design, landscaping and best practice construction methods, it is considered that significant environmental effects are unlikely to arise and therefore the proposal would not constitute EIA development.

This conclusion is in line with the Planning Practice Guidance on Schedule 2 development which defines 1,000 new dwellings as a suitable threshold above which significant effects may occur. This is substantially higher than the quantum of development proposed.

As stated in the PPG: "*Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination".*

We request that, in accordance with the EIA Regulations, London Borough of Brent provides a formal EIA Screening Opinion within the requisite three weeks. Please do not hesitate to contact me should you require additional information prior to forming the Screening Opinion.

Yours sincerely

Charles McClea
Savills Planning and EIA

Enc Location Plan (Drawing 1557-BUJ-ZZ-GF-DR-A-0001)