390 – 406 High Road, Wembley

Request for Environmental Impact Assessment Screening Opinion

Prepared for:
Regal High Road Limited

Date:
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Introduction

1. We write on behalf of Regal High Road Limited (hereinafter referred to as the 'Applicant') to request an Environmental Impact Assessment (EIA) Screening Opinion from the London Borough of Brent ('LBB') in relation to the redevelopment of an 0.14 hectares (ha) site in Wembley referred to as 390 – 406 High Road ('the Site').

2. The Applicant is seeking detailed planning permission for a Proposed Development (hereinafter referred to as the 'Proposed Development') that involves the demolition of the existing buildings on the Site and the construction of a single building ranging in height from 13-17 storeys. The single building is to provide up to 350 new student accommodation units, flexible ground floor employment and commercial space and associated indoor and outdoor amenity space. The Site currently contains two mixed use commercial buildings comprising Fairgate House and Pitman House.

EIA Legislation and Guidance

3. The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended in 2018 and 2020)[1] ('EIA Regulations') are the key legislation relating to the requirement to consider the likely environmental effects of development projects within the planning system in England. The EIA Regulations provide screening criteria and thresholds at which certain types of development projects should be screened in order to determine whether a project is an 'EIA Development.'

4. Regulation 2 of the EIA Regulations define 'EIA Development' as that which falls either under Schedule 1, where EIA is mandatory, or under Schedule 2, where **only development likely to have significant effects on the environment** by virtue of factors such as its nature, size or location should be considered 'EIA Development.'

5. The Proposed Development does not fall under any of the descriptions within Schedule 1, it does however fall under 10(b) 'Urban Development Projects', as listed in Column 1 of Schedule 2. For this type of development, consideration must be given to whether the Site is located in a 'sensitive area' (as defined under Regulation 2), or whether the associated relevant screening thresholds and criteria are met or exceeded, which in this case are:

   - The development includes more than 1 hectare 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 5 hectares.

6. When a development lies within a 'sensitive area' or meets/exceeds these screening thresholds, the development constitutes 'Schedule 2 development' and needs to be screened by the relevant local authority to determine whether significant environmental effects are likely and hence whether an EIA is required. When screening Schedule 2 developments, the relevant authority, in this case the LBB, must take account of the selection criteria in Schedule 3 of the EIA Regulations. This includes the:

   - Characteristics of development;
   - Location of development;
   - Types and characteristics of the potential impact.

Application of the Legislation to the Proposed Development

7. Based on the Schedule 2 criteria of the EIA Regulations, the Site is not located within or in proximity (i.e. 500m) of an environmental 'sensitive area'. The Site area does not exceed 5 hectares and the development does not include more than 1 hectare of urban development which is not dwelling house development.

8. However, the Proposed Development consists of more than 150 dwellings (i.e student accommodation units), which exceeds the thresholds stated in Schedule 2 of the EIA Regulations. Therefore, the

[1] *The Town and Country Planning (Environmental Impact Assessment) Regulations 2017*

Proposed Development is required to be screened by the LBB to determine whether significant environmental effects are likely which would trigger the requirement for an EIA.

9. This Request for an EIA Screening Opinion presents a review of the environmental topic areas and associated receptors that have the potential to be affected by the Proposed Development, to ascertain whether significant effects are likely, and an EIA would be required.

10. It is demonstrated through this review that there is not likely to be any significant environmental effects that would trigger the requirement for an EIA. This document also stipulates what mitigation has been relied upon to avoid or prevent what might otherwise have been significant adverse effects.

Information Required for Screening

11. To enable an LPA to provide a Screening Opinion and determine whether or not a development is an EIA Development, the EIA Regulations (paragraph 6(2)) require that the following information be issued to the LPA, as the competent authority:

- (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.

12. The information above is provided within this Request for an EIA Screening Opinion, set out in accordance with the EIA Regulations Schedule 3 screening criteria.

Site Location and Surrounds

The Site Location and On-Site Conditions

13. The Site is located at 390 – 406 High Road, Wembley, in the LBB (centred on National Grid Reference TQ 18621 85274). It is occupied by two buildings Fairgate House (390 – 400 High Road, Wembley) and Pitman House (402 – 406 High Road, Wembley).

14. Fairgate House is located to the east and Pitman House to the west, the two buildings are connected at ground floor. The ground floor uses comprise a number of retail and commercial uses (Use Class E(a) and E(c)). Pitman house extends 2-stories above ground level comprising further retail and commercial land uses whilst Fairgate House comprises an additional 6 stories ground level containing office space. A number of the onsite premises are currently vacant and not currently in operation. The existing buildings are shown in Figure 1.

Figure 1 The Existing Site

Source: Google Maps 2022

15. The Site is bound by:

- Hardstanding and railway lines associated with Chiltern Railways to the north;
- Capital School of Business and Management, Stonebridge Boxing Club and Yaseen Youth Centre to the east;
- High Road (A404) to the south and Ark Elvin Academy, which is a mixed use secondary school and sixth form, further to the south; and
- A small access road as well as retail and food and food and beverage shops to the west.

16. The Site's location plan and planning application redline boundary are illustrated in Figure 2 and Figure 3 respectively.

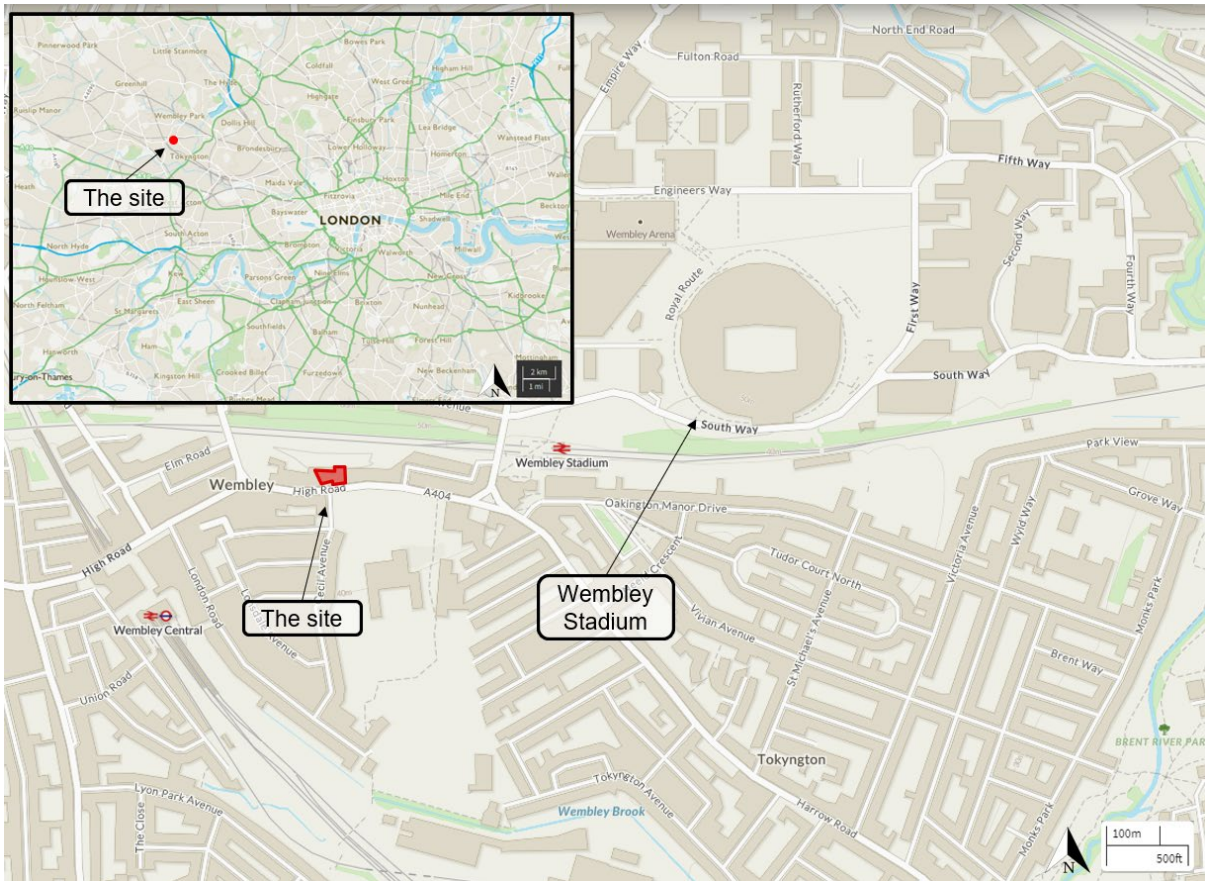
17. A desk-based review of the Site and its onsite environmental considerations is provided below. The Site:

- is located within an Air Quality Management Area (AQMA, 2006)[2] for nitrogen dioxide and particulate matter;

[2] *DEFRA (2021). https://uk-air.defra.gov.uk/aqma/details?aqma_ref=120*

- is located between the A404 High Road and railway tracks associated with the Chiltern Railway serving Wembley Stadium station. Both of these noise generating uses contribute to baseline and ambient noise conditions;
- does not contain any statutory or non-statutory nature conservation designations;
- does not contain any listed buildings or located within a Conservation Areas area;
- is not located within a Landmark Viewing Corridor identified by the London View Management Framework (LVMF)[3]; and
- is defined as being located within Flood Zone 1[4], indicating a 'low' probability of flooding from rivers.

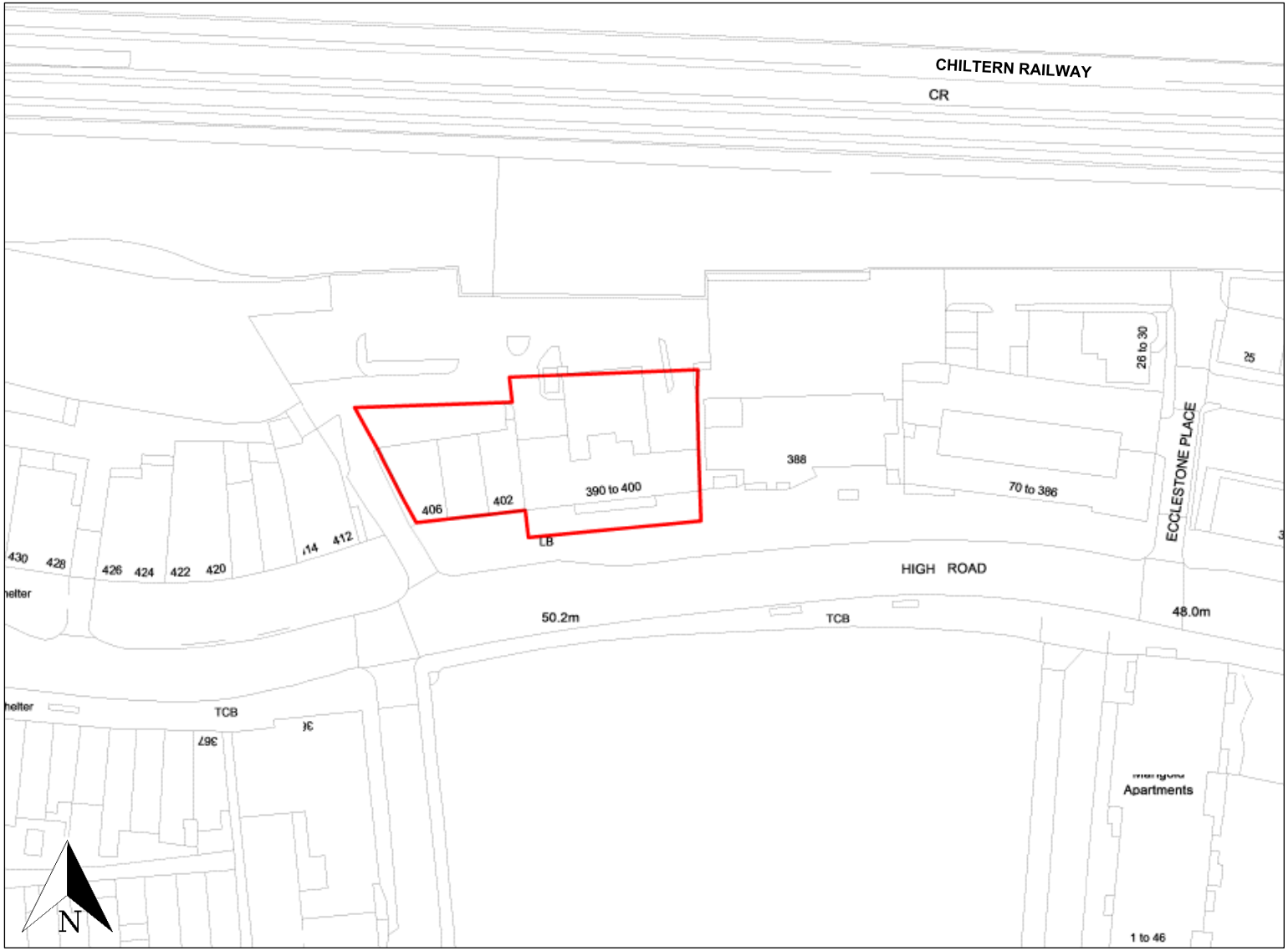
Figure 2 Site Location



Source: OS Maps (2022)

[3] *GLA (2012). https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs/london-view-management*
[4] *https://flood-map-for-planning.service.gov.uk/*

Figure 3 **Indicative Red Line Planning Application Boundary**



The Surrounding Area

18. A desk-based review of the surrounding environmental considerations has been undertaken, a summary of which is provided below and illustrated in Figure 4:

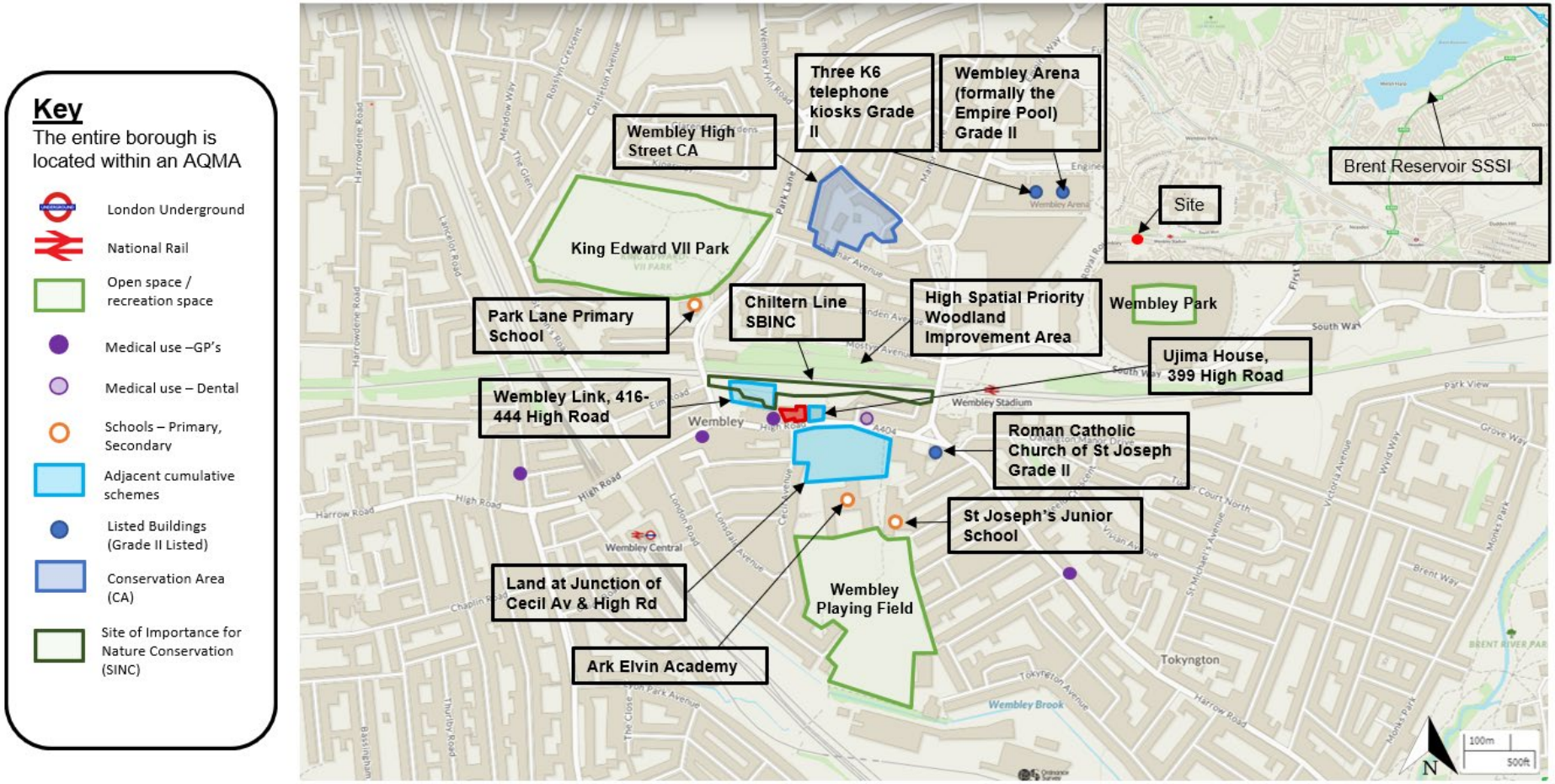
- An Air Quality Management Area (AQMA) which was declared by the LBB for exceedances of the annual mean nitrogen dioxide (NO_2) and 24-hour particulate matter (PM_{10}) objectives. The AQMA is located across the entirety of the south and east of the LBB with the nearest area not covered by the AQMA being located over 1.5km to the north. The *'Wembley High Road from Ealing Road to Park Lane'* air quality Focus Area is located approximately 50m to the east. The Focus Area is one of 187 areas identified by the Greater London Authority (GLA)[5] as locations that not only exceed the annual limit value for NO_2, but also have high levels of human exposure;
- The wider landscape character of the surrounding area is dominated by an urban environment. A High Spatial Priority Woodland Improvement Area[6] is located to the north of the Site. The Chiltern Line between River Brent and Sudbury Hill Harrow Site of Borough Importance for Nature Conservation (SBINC) is located approx. 20m to the north of the site.
- Wembley Stadium 600m to the north-east, sports fields 350m south and Kind Edward VII Park located 310m north-west. No internationally protected sites are located within 7km of the Site and Brent Reservoir Site of Special Scientific Interest is located 2.75km north west;
- There are a range of local public transport facilities within the surrounding area these include Wembley Stadium and Wembley Central railway stations circa 350m and 450m respectively from the Site. The Wembley Park London Underground (LU) station also available within a 1.5km walking distance. The railway stations provide access to Chiltern Railways at Wembley Stadium and Southern Railways / London Overground at Wembley Central, with the LU station providing Jubilee and Metropolitan line services;
- The nearest listed building is St Josephs' Church (Grade II), the church is approximately 220m southeast and Wembley High Street Conservation Area is approximately 320m north.
- The social infrastructure within a 1-mile radius includes, nine state-funded primary schools, six secondary schools, four independent schools and one infant school. The closest infant school is St Joseph's Infant School, around 340m southeast. The closest primary school is Park Lane Primary School, approximately 300m northwest. The nearest secondary school is Ark Elvin Academy located approximately 200m southeast from the Site. The closest nursery is Eliana's Bilingual Nursery 280m southeast. There are 14 GP surgeries (NHS Brent CCG) within a 1-mile radius, the closest being Lancelot Medical Centre located 610m west;

19. A detailed baseline assessment has been undertaken for each environmental topic considered within this report as part of the **Characteristics of Potential Effects** section.

[5] *Air quality Focus Areas are locations with high levels of human exposure where the EU annual mean limit value for nitrogen dioxide is exceeded.*

[6] *London Borough of Brent. Review of Sites of Importance for Nature Conservation* https://legacy.brent.gov.uk/media/16402896/sinc-introduction-methodology.pdf

Figure 4 Surrounding Environmental Context



Description of the Proposed Development

20. The Applicant is seeking planning permission of the demolition of the existing buildings and the construction of a single building which will contain student accommodation housing. The single building is likely to range in height, stepping up from 13, 16 and 17 storeys. The Proposed Development will provide:

- Up to 350 units of student accommodation (Sui Generis) and ancillary facilities including a gym, study spaces and external roof terrace;
- Up to 400m^2 flexible employment and commercial floorspace (Use Class E) at ground floor level;
- An external roof terrace at 13th floor level;
- Bin store, plant, Back of House (BOH), cycle parking; and
- Associated ground floor landscaping.

21. The student accommodation building will comprise a range of accommodation types within cluster style accommodation. Room types will include double bedrooms with access to communal living / kitchen areas, studios, double bedrooms with private kitchen and larger double bedrooms with private kitchens.

22. The ground floor of the Proposed Development will contain non-residential uses including flexible employment and commercial floorspace (Use Class E), a cycle hub and indoor student amenity space. The first floor will contain a large section of indoor student amenity in addition to cluster accommodation. The remaining floors from second floor level upwards will contain student accommodation units (Sui Generis Use) and indoor student amenity. An external roof terrace will be provided for on the twelfth-floor level and will be accessible by student residents of the building.

23. Both hard and soft landscaping will form part of the Proposed Development. Landscaping will feature at ground floor level along the southern boundary, adjacent to High Road, and to the north of the single building. Further landscaping will be included at terrace level.

Planning Context

Planning Policy

24. The National Planning Policy Framework (NPPF)[7] sets up the Government's economic, environmental and social planning policies for England. The policies contained within the NPPF articulate the Government's vision of sustainable development, which are intended to be interpreted at a local level, to meet the requirements of local aspiration.

25. On the 19th of June 2019, the Ministry of Housing, Communities and Local Government published a revised NPPF, this revision replaces the previous editions of the NPPF.

26. The Brent Local Plan 2019-2041[8] was adopted by the LBB on 24th February 2022. This replaced the Brent Core Strategy 2010, Brent Site Allocations Plan 2011, Wembley Area Action Pan 2015 and Development Management Policies Plan 2016.

27. The site forms part of the larger BSWSA8 – Wembley High Road Site Allocation as described in the Brent Local Plan 2019 – 2041. The site and its surrounds are allocated for mixed-use residential led development incorporating main town centre uses and an increase in industrial floorspace.

28. There are two planning applications with permission granted (subject to discharge of conditions) located within site allocation BSWSA8 (Ujima House (planning reference: 19/3092) and Wembley Link – Phase 2 (planning reference: 18/3111)). Should future planning applications be sought for approval following planning permission being granted for the Proposed Development within the site allocation, each future application would need to consider the potential for effects (including cumuatlive effects) which could be considered significant in accordance with the EIA Regulations. In the event that significant cumulative effects are considered likely, an EIA may be required for any future planning applications.

[7] *Ministry of Housing, Communities and Local Government (DCLG), (2019); National Planning Policy Framework*
[8] *London Borough of Brent (LBB), (2022); Brent Local Plan*

Planning Application Supporting Documents

29. A number of environmental reports will be prepared to accompany the planning application (in addition to a number of other planning documents) and include the following:

- Transport Assessment (including Draft Delivery and Servicing Plan);
- Framework Travel Plan;
- Circular Economy Statement ;
- Air Quality Assessment (including Air Quality Positive Assessment);
- Ecological Impact Assessment (including relevant protected species surveys and reports);
- Noise and Vibration Impact Assessment;
- Wind Report (CFD);
- Contamination Assessment;
- Construction Logistics Plan;
- Energy Statement;
- Sustainability Statement ;
- Heritage and Townscape Visual Impact Assessment;
- Tree Survey and Arboriculture Impact Assessment;
- Flood Risk Assessment;
- Daylight and Sunlight Assessment (including overshadowing and solar glare);
- Drainage Strategy (including Foul Sewage Assessment);
- Whole Carbon Lifecycle Assessment; and
- Urban Greening Plan (included in D&AS).

30. Input from the technical consultants preparing these assessments has been sought throughout the EIA Screening process.

31. A Construction Traffic Management Plan (CTMP) and Site Waste Management Plan (SWMP) is likely to be secured through a planning condition.

32. This Request for an EIA Screening Opinion is also informed an accompanied by the following reports:

- **Appendix A:** Preliminary Ecological Assessment
- **Appendix B:** Archaeological Desk Based Assessment
- **Appendix C**: Preliminary Risk Assessment
- **Appendix D:** Acoustic Survey Report
- **Appendix E:** Townscape View Maps

Screening of the Proposed Development

33. The potential for the Proposed Development to have significant environmental effects have been considered in relation to the following environmental aspects:

- Population and Health;
- Ecology and Biodiversity;
- Ground Conditions and Contamination;
- Flood Risk and Drainage;
- Transport and Access;
- Air Quality;
- Noise and Vibration;
- Heritage and Townscape, Visual Impact Assessment (HTVIA);
- Archaeology;
- Microclimate – Daylight, Sunlight, Overshadowing, Solar Glare, and Light Pollution;
- Microclimate – Wind Microclimate;
- Waste; and
- TV and Radio Interference.

34. A review of the likelihood for significant environmental effects has been undertaken by Trium Environmental Consulting LLP (Trium) in conjunction with the relevant technical specialists within the project team, and is presented below, with justification provided for concluding that significant environmental effects are not likely.

35. In line with Regulation 6(4a) of the EIA regulations, the criteria provided in Schedule 3 ("*Selection criteria for screening Schedule 2 development*") must be considered when determining whether or not a Schedule 2 development is 'EIA development'.

36. Making use of the provision contained within Regulation 6(3)(d), the Applicant has also taken the opportunity to provide further information on the Proposed Development and its potential effects in relation to each of the selection criteria contained in Schedule 3. This is provided in the section of this report titled **Consideration of Schedule 3 EIA Screening Criteria**.

Consideration of Schedule 3 EIA Screening Criteria

1. Characteristics of the Development

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

a. Size and design of the development

The Site boundary covers an area of 0.14ha. The Proposed Development comprises the demolition of all above ground structures and construction of one new stepped building of maximum 17 storeys, which steps down to 16 and 13 storeys in height to provide accommodation up to 350 student units. The ground floor will contain five flexible employment generating spaces with an area of up to 240m^2.

b. Cumulation with other development / or approved development

38. A review has been undertaken of the potential for any in combination effects relating to the Proposed with surrounding relevant cumulative schemes. The following assessment of potential cumulative effects is based on the information available on the LBB's planning register[9].

39. Generally, the schemes (referred to as 'cumulative schemes') included when considering potential cumulative effects are within 1km of the Site and either have:

- Full planning consent; or
- A resolution to grant consent; and

[9] *https://pa.brent.gov.uk/online-applications/search.do?action=simple*

- An uplift of more than 10,000 square meters GEA of mixed-use floorspace or, provide over 150 residential units; or
- Office to residential conversions (granted under the General Permitted Development Order) giving rise to over 150 residential units.

40. Table 1 lists other developments which meets the criteria listed above.

Table 1 Cumulative Scheme List (February 2022)

Cumulative Scheme	Planning Application Reference Number	Distance	Status
Land Surrounding Wembley Stadium Station, South Way, Wembley.	**14/4931**	550m NE	Some of the buildings are complete and operational, others are still under construction. **Permission Granted:** 23rd December 2016.
Wembley Masterplan	**15/5550**	400m – 1km NE	A number of elements of the outline application are complete and operational whilst others are yet to begin construction. **Permission Granted:** 23rd Dec 2016.
Land at Juncture of Cecil Ave & High Road, HA9	**19/2891**	40m S	Construction has not yet started. **Planning Permission Granted:** 5th February 2021.
Fulton Quarter - Stadium Retail Park + Fountain Studios 128 Wembley Park Drive Olympic Way.	**17/3059**	1km NE	Construction has not yet started. **Planning Permission Granted:** 1st February 2021
Red House building, South Way, Land and Pedestrian walkway between South Way and Royal Route, Wembley Park Boulevard, Wembley	**15/3599**	500m NE	Construction has not yet started. **Planning Permission Granted:** 27th Jul 2016
Wembley Link, Land, garages, alleyway rear of 416-444, High Road, Wembley, HA9	**18/3111**	50m NW	The site has been cleared; construction has started. **Planning Permission Granted**: 6th April 2020.
1-7, 9, 11 & 11A Elm Road, Wembley, HA9 7JA	**18/1592**	420m W	Construction has not yet started. **Planning Permission Granted:** 17th October 2018.
Ujima House, 388 High Road, Wembley, HA9 6AR	**19/3092**	Adjacent E	Construction has not yet started. **Planning Permission Granted:** 5th February 2021.

41. All the identified developments should be constructed in adherence to a CEMP, or an equivalent construction plan designed to avoid and minimise environmental effects (e.g., noise and dust) as far as is practicable. It is expected that a CEMP would be secured through a suitably worded planning condition for any of the above listed potential cumulative schemes. If the Proposed Development proceeds at the same time as one or more of these other schemes, as a result of environmental control and mitigation measures secured in relation to each scheme, and the distance of each cumulative scheme from the Site, it is considered unlikely that significant cumulative environmental effects will arise during the construction works.

42. The potential for significant environmental effects as a result of the Proposed Development in combination with other cumulative schemes (where relevant) during demolition and construction works is considered in further detail under the **Section 3 Type and Characteristics of Potential Effects** section below.

43. During operation of the Proposed Development, traffic associated with each of the cumulative schemes are accounted for through the application of growth factors on existing traffic flows. This means that cumulative increases in transport, and by extension increases in air pollutants and road traffic noise, are intrinsically taken into account in these assessments.

44. Given the location of the Site within the surrounding townscape, the Proposed Development will be seen in conjunction with other cumulative schemes and, the Proposed Development has been designed with the surrounding context in mind. At a maximum of 17 storeys, the Proposed Development would feature above the neighbouring 12 storey Ujima house, and below the 18 storey Wembley Link building. This is explored further within the **Section 3 Type and Characteristics of Potential Effects** section of this Request for an EIA Screening Opinion. The HTVIA would assess a range of cumulative schemes chosen for their potential impact on views, townscape, and heritage. The results of the cumulative assessment would be provided in the HTVIA, which will accompany the planning application.

45. A preliminary wind impact assessment has been undertaken to support the design development and it has considered cumulative schemes included within 360m of the Site boundary. The results of the cumulative assessment will be provided in the Wind Impact Assessment which will accompany the planning application.

46. Cumulative effects in relation to construction, wind microclimate, townscape and traffic are those topics where cumulative effects are considered most likely. Potential cumuatlive effects from other topics are not considered likely therefore have not been considered in further detail.

47. None of the cumulative schemes shown in Table 1 are expected to result in impacts on the Proposed Development or surrounding properties in relation to environmental effects or themselves be affected by the Proposed Development.

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

48. The Proposed Development would utilise sustainable design measures to minimise the use of natural resources during construction and operation. The Proposed Development would be constructed using highly efficient modern methods of construction, employing recycled steel, aluminium, concrete, FSC certified timber and low carbon cements to minimise the embodied carbon footprint. In line with best practice and policy requirements.

49. The Proposed Development shall seek to minimise energy and water use by design. Sustainable Drainage Systems (SuDS) are proposed to be incorporated to manage surface water runoff, with attenuation to be provided within cellular storage tanks at basement level.

50. Ground floor landscaping to the south and north of the building will enhance the existing ecological value. The Preliminary Ecological Assessment (PEA) has made recommendations which would lead to a biodiversity net gain over the existing Site, with the inclusion of green roofs, native planting, and biodiverse landscaping. **Appendix A** presents the PEA.

d. The production of waste

51. Best construction practices would be employed to minimise the construction waste arisings, according to current waste legislation and guidance, and would be achieved through the implementation of the CEMP and (SWMP). It is expected that a CEMP and SWMP will be secured by a reasonably worded planning condition.

52. Sufficient waste storage facilities would be designed into the Proposed Development, in line with the LBB requirements and the waste hierarchy. Refer to the waste section under **Section 3 Type and Characteristics of Potential Effects** of this report for further consideration of waste effects.

e. Pollution and nuisances

53. Possible noise and air pollution / nuisances arising from building plant and light pollution during the construction phase and once the Proposed Development is complete and operational would be subject to regulatory controls, to ensure that any adverse pollution / nuisance effects are avoided or reduced to an acceptably low level. Given the surrounding noise sensitive uses (surrounding residential uses), activities with the potential to generate high levels of noise, vibration, air pollution and dust during demolition and construction would be identified and mitigated for the Proposed Development; for example, screening/hoarding the borders of the Site, using low impact machines and techniques, using water as a dust suppressant. Suitable construction working hours would be proposed following engagement with surrounding sensitive receptors and be subject to agreement between the Applicant and the LBB regarding reasonable operational hours, given noise sensitive uses nearby the Site.

54. Plant installed as part of the Proposed Development would be built to the latest energy standards and regulatory requirements and, as such, is anticipated to improve energy use and reduce carbon emissions compared with the existing plant. There is also likely to be a betterment in noise and air quality emissions associated with the installed plant, with noise limiting values set to achieve acceptable noise levels at nearby sensitive receptors. Additional betterment is likely as a result of reduced vehicle trips, which are set to achieve an improvement over baseline conditions.

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

55. The Site is not located in the vicinity[10] of any Control of Major Accident Hazard (COMAH)[11] sites. During the construction works, the implementation of the CEMP by the appointed contractor would through a range of environmental controls ensure that any hazardous materials onsite, including asbestos, would be removed in an appropriate manner and by licenced contractors. As the Site is located within Flood Zone 1, flood risk would be dealt with through a standalone Sustainable Urban Drainage Strategy (SuDS) strategy which will accompany the planning application.

56. The Site is not in the protected flight zones of Heathrow Airport, RAF Northolt or Denham Aerodrome, and the Proposed Development is notably smaller than the evolving surrounding context. The Proposed Development does not comprise industrial development, so the risk of accidents and disasters in relation to the end use of the Proposed Development is inherently low.

g. The risks to human health

57. The Proposed Development would not lead to significant risks to human health. As further explained in **Section 3**, no significant population and health, air quality or acoustic issues are anticipated as a result of the Proposed Development, with the potential for improvements over the existing baseline.

58. Gross contamination is not anticipated at the Site based on its existing or historic uses given extensive clearance will have been undertaken for the enabling works of the existing building, though contamination 'hotspots' may be encountered within soils. An intrusive ground investigation is proposed following demolition of the existing building, to determine whether there are potential risks to human health or environmental receptors from soil, groundwater, or ground gas contamination, which will assist in identifying whether a remediation strategy is required to ensure that the Proposed Development is suitable for the proposed use. Construction workers will be protected through use of appropriate Personal Protective Equipment (PPE) in accordance with the CEMP.

2. Location of Development

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

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

i. The existing land use is commercial comprising office and retail uses;
ii. The Site currently comprises two buildings Pitman House and Fairgate House which are ground + 2 storeys and ground + 6 storeys respectively;

[10] *No establishments were identified within three miles of the site, as identified by https://notifications.hse.gov.uk/COMAH2015/Search.aspx.*
[11] *HSE Control of Major Accident Hazards (COMAH) Regulations sites www.hse.gov.uk/COMAH2015/Search.aspx*

iii. The immediate surrounding land uses are characteristic of urbanised area. The surrounding uses comprise primarily of a mix of commercial, educational, and residential uses. Key surrounding public transport infrastructure includes Wembley Central, and Wembley Stadium stations and several bus stops are located within 500m of the Site; and

iv. To avoid duplication, a full summary of the surrounding land uses is included earlier in this Request for an EIA Screening Opinion.

b. the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water, and biodiversity) in the area and its underground.

60. The quality and regenerative capacity of natural resources in the area should not be impacted significantly given the existing land uses and the scale of the Proposed Development:

i. The Site is currently occupied by a commercial building and would therefore be considered a brownfield site. The demolition and construction of the existing building would follow a CEMP and SWMP to be carried out by a principal contractor the scope of which would be agreed with LBB.

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

(i) Is not located within a 'sensitive area', as defined by the EIA Regulations (Regulation 2);

(ii) Is not located in nor bound by a nature reserve nor in a nationally designated area such as a Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC), Special Protection Area (SPA), National Park, Area of Outstanding Natural Beauty (AONB), National Nature Reserve (NNR) or Ramsar Site;

(iii) Is not covered by any statutory or non-statutory nature conservation designations. The nearest statutory designated site is Brent Reservoir (SSSI) located 2.75km northeast of the Site. The nearest non-statutory nature designation is the Chiltern Line between River Brent and Sudbury Hill Harrow Site of Borough Importance for Nature Conservation (SBINC) located approx. 20m to the north of the site.

c. The absorption capacity of the natural environment

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

i.- iv Wetlands, riparian areas, river mouths coastal zones, mountain and forest areas, Nature reserves and parks:

a. The Site is not located within the vicinity of any of the following areas identified in Schedule 3 of the EIA Regulations: wetlands, river mouths, the marine environment, coastal zones, mountains, forests, nature reserves or parks.

iv. European sites and other areas classified or protected under national legislation

a. The Site is not located within a World Heritage Site (nor are there any located in the immediate vicinity) and there are no scheduled monuments or listed buildings onsite. The Site is located within the SSSI Impact Risk Zone for Brent Reservoir (SSSI) which is located 2.75km northeast. Given the above distances, the Proposed Development will not lead to direct impacts during demolition, construction or operation.

v. Areas in which there has already been a failure to meet the environmental quality standards

a. The Site is located within an AQMA for exceedances in Particulate Matter PM_{10} over the 24-hour mean and Annual Nitrogen Dioxide NO_2 quantities. The LBB have opted to apply these classifications across the Borough. Site suitability and air quality potential effects have been considered throughout the design of the Proposed Development and reasonable mitigation measures have been implemented or committed to, to avoid and reduce potential effects where possible.

vi. Densely populated areas

a. The Site is located within a dense urban area within Wembley. The area lies between two of Wembley's main transport routes, Wembley Stadium and Wembley Central rail stations are both within a close walking distance. Wembley Park London Underground (LU) station also available within 1.5km walking distance.

b. The Proposed Development will deliver a new piece of public realm along the High Road, improving the townscape environment.

vii. Landscapes and sites of historical, cultural or archaeological significance

a. The Proposed Development would appear among the grouping of emerging buildings lying to the south of the tall buildings cluster at Wembley Stadium. The Proposed Development would not be visible from any LVMF views. In the cumulative condition, it would appear among the grouping of residential buildings lying to the south of the commercial tall buildings cluster in such views, its height consistent with the stepped arrangement of these buildings from north to south

b. The Site is not located within an archaeological priority area.

3. Type and Characteristics of Potential Effects

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

Population and Health

63. The consideration of the potential effects on population and health as a result of the Proposed Development has been undertaken by Trium.

Baseline

64. The LBB has a population of 330,795 across 118,710 households. The BLP estimates that the population is expected to grow by 17% between 2020 and 2041 (56,900 additional residents). Brent is densely populated with 7,580 people per square kilometre and growth within the LBB is expected to be concentrated around significant housing developments. As of 2018, 71% of the population were in employment, which is lower than the national average of 75%. The median age of the population within LBB is 36, with the highest proportion of people being aged between 35 – 39. The borough Plan 2021 – 2022[12] includes delivering 954 affordable homes and 309 social housing properties to meet housing needs.

65. The social infrastructure within a 1-mile radius of the Site includes, nine state-funded primary schools, six secondary schools, four independent schools and one infant school. The closest infant school is St Joseph's Infant School, around 340m southeast from Site. The closest primary school is Park Lane Primary School, approximately 300m northwest of the Site. St Joseph's currently have capacity available for 2021/2022 academic year and Park Lane Primary School also have capacity available for the 2022/2023 academic year. The nearest secondary school is Ark Elvin Academy located approximately 200m southeast from the Site. Ark Elvin is currently at full capacity for the 2021/2022 academic year for all year groups. The two closest nurseries are Eliana's Bilingual Nursery 280m southeast and Wembley Central Nursery School, approximately 430m southwest.

66. There are 14 GP surgeries (NHS Brent CCG) within a 1-mile radius of the Site, the closest being Lancelot Medical Centre located 610m west of the Site and Wembley Park Drive Medical Centre located 740m north of the Site, both of these are registering new patients. Lancelot Medical Centre currently has 7,007 practice patients, and Wembley Park Drive Medical Centre have 12,380 registered patients. The Healthy Urban Development Unit (HUDU) has a benchmark of 1,800 registered patients per NHS GP, for which Lancelot Medical Centre and Wembley Park Drive Medical Centre.

67. There are 9 dentists within a 1-mile radius, the closest being Wembley High Street Dental Practice, located approximately 70m east of the Site. The closest hospital is Central Middlesex Hospital, located 1.9 miles from the Site which is part of London Northwest University Trust.

68. The nearest public amenity spaces include King Edwards VII Park, located 310m north of the Site and Barham Park, located 1.1km west of the Site. King Edwards VII Park contains sports facilities, a playground and a flower garden. Barham Park has a children's play area and walled garden, popular with visitors. There are numerous shops, gyms, cafes, and restaurants along High Road, Wembley. Wembley Stadium is also located approximately 600m northeast from the Site. Wembley Central train

[12] *Brent (2020); Brent Borough Plan Accessible via: https://www.brent.gov.uk/media/16417953/borough-plan-2021-22.pdf*

station is approximately 420m southwest and Wembley Stadium train station is closest to Site at approximately 280m east.

Key Issues and Potential Effects

Demolition and Construction

69. The construction of the Proposed Development would provide some temporary local employment opportunities, as would be expected for a development of this type. There would be construction jobs supported during the demolition and construction phases of the Proposed Development, which is beneficial, but, in the context of mobility of construction workers across London and level of existing employment in the London Borough of Brent, unlikely to be significant.

Operation

70. Once complete and occupied, the Proposed Development would provide student accommodation housing in the local area. This new resident student population within the Proposed Development would result in some increased spending in the local area. This effect whilst positive, would be unlikely to be significant in terms of the local economy. Although it is not expected that the Site would produce an increased child yield by nature of the studio clustered student accommodation, a review of the local primary and secondary schools indicates they have capacity, GP's also show capacity. Therefore, effects on social infrastructure are not expected to be significant.

71. Once operational, the Proposed Development will introduce new Class E floorspace to High Road, Wembley. Given that the majority of the existing buildings on the Site are vacant, this will provide additional employment opportunities with active frontages to connect to the wider regeneration of High Road, Wembley and an aspirational route between Ecclestone Place and Park Lane. The final intended uses of this employment space have not yet been determined and will be finalised at subsequent design stages. The quantum of operational jobs created at the Proposed Development as a result of the Use Class E floorspace is expected to be very small relative to existing levels of employment in the LBB but will be beneficial none-the-less. Based on this minor contribution, effects on operational employment are not anticipated to be significant.

72. Consideration has been given to the operational health implications of the Proposed Development - health has been inherently considered under a number of topics within this Request for an EIA Screening Opinion, namely the air quality assessment, noise & vibration assessment, within the implementation of the mitigation measures referenced in the relevant sections of this report, no significant effects are anticipated. As described, the Proposed Development will provide predominantly student accommodation and Use Class E floorspace which is expected to contribute positively to the health and wellbeing of the resident existing population, and the future Proposed Development community.

Conclusion

73. Given the above, the Proposed Development is not considered likely to result in significant effects in relation to population or human health. An Air Quality Assessment and a Noise and Vibration Impact Assessment will be produced and submitted to accompany the planning application. Human health has also been considered in section 1 (g) (paragraphs 56 and 57).

Ecology and Biodiversity

74. The consideration of the potential effects of the Proposed Development has been undertaken by Ecology by Design Ltd. A Preliminary Ecological Appraisal (PEA) has been prepared by Ecology by Design Ltd was produced in February 2022. This report is based on a field survey using standard methodologies[13] and utilising the UK Habitat Classification System[14] carried out to assess the ecology of the Site on 4th February 2022. The aim of the PEA is to map the habitats present onsite and assess their potential to support notable / protected species. The PEA was supported by the following:

[13] *CIEEM (2017). Guidelines for preliminary ecological appraisal, 2nd edition. Chartered institute of Ecology and Environmental management, Winchester*
[14] *Butcher, B., Carey, P., Edmonds, R., Norton, L. ad Treweek, J. (2020). UK Habitat Classification– Habitat Definitions V1.1. at http://ukhab.org*

- An initial ecological desk study;
- A survey of the habitats; and
- A protected species scoping survey.

75. The PEA has been appended to this report and is included in **Appendix A**.

Baseline

76. The Site is deemed to have low ecological value, being of negligible value to local wildlife. None of the habitats within the Site meet the criteria for a habitat of principal importance under the NERC Act 2006.[15]. The Site was assessed as being dominated by two large buildings, the existing building's walls and roofs were assessed for protected species such as bats and birds and the habitats onsite were assessed for other flora, mammals, reptiles, amphibians and invertebrates – the buildings were found to contain some features considered to be suitable for roosting bats, foraging and commuting. There remains the potential for bats to be affected by the Development, and surveying has been recommended and the PEA will be updated following these surveys and resubmitted to support the planning application. Habitats onsite are considered suitable for other species such as reptiles and invertebrates, but it is considered that these species are unlikely to be present within the Site due to its isolated nature and the very limited extend of suitable habitat. Therefore, it is assessed that no other protected species would be present. There is potential for breeding birds to be present onsite and all birds within the UK are protected by the Wildlife and Countryside Act 1981 (as amended) whilst nesting, these will be managed during construction through the implementation of a CEMP.

77. There is one nationally protected Site, Brent Reservoir Site of Special Scientific Interest (SSSI), notified for its ecological interest 2.8km north east of the Site boundary.

78. The Chiltern Line between River Brent and Sudbury Hill Harrow Site of Borough Importance for Nature Conservation (SBINC) is located approx. 20m to the north of the site.

Key Issues and Potential Effects

Demolition and Construction

- Potential for destruction of active wild birds' nests during building demolition and vegetation clearance; and
- Potential for destruction of a bat roost or roosts during demolition of the building.

Operation

- Potential for disturbance of wildlife, particularly foraging bats, in habitat to the north of the Site due to altered lighting within the Site.

Design Measures and Mitigation

79. Following the implementation of reasonable design and mitigation measures the Proposed Development will not result in any adverse significant impacts to species present within the Site or surrounding area. The PEA has recommended the following specific mitigation and enhancement for species include:

- Habitat creation to improve the biodiversity value of the Site;
- Implementation of a sensitive lighting scheme to avoid disturbing bats;
- A check for hedgehogs prior to clearance of the mixed scrub;
- Demolition of buildings and vegetation clearance undertaken outside of the nesting bird season (March to August inclusive) or preceded by a check from a suitably experienced ecologist;
- Control of invasive species to prevent their spread; and
- Implementation of appropriate site management practices.

[15] *Anon (2006). Natural Environment and Rural Communities (NERC) Act 2006. HMSO, London.*

80. It is likely that given the implementation of the above measures, the Proposed Development is likely to result in a net gain of biodiversity once completed and operational. Ecological enhancements will be embedded into the design of the Proposed Development.

Conclusion

81. The Proposed Development is not considered likely to result in significant effects in relation to biodiversity. An updated Preliminary Ecological Appraisal alongside a Bat Emergence/Return Roost Survey Report will be submitted to inform the planning application.

Ground Conditions and Contamination

82. The consideration of the potential effects on ground and groundwater conditions as a result of the Proposed Development has been undertaken by Curtins.

83. A Phase 1 Preliminary Risk Assessment (PRA) (Refer to **Appendix C**) has been produced for the Proposed Development and has been used to inform this screening assessment.

Baseline

84. The Site has been subject to two previous phases of development since the nineteenth century. The first phase (1940s) comprised a depot and a garage which extends beyond the Site boundary to the east. The Site was later developed to within its current configuration (commercial) in the 1970s.

85. Based on geological mapping and phases of development, it is anticipated that the Site is underlain by made ground over bedrock of London Clay detailed as an Unproductive Aquifer. Unproductive Aquifers are defined as strata with negligible significance for water supply or baseflow to rivers, lakes and wetlands. The Site is not within a groundwater Source Protection Zone (SPZ). The Site is designated as being at Low risk from groundwater flooding.

86. There are no surface water features within 250m of the Site.

Key Issues and Potential Effects

87. Previous contaminative activities associated with the depot and garage may have resulted in soil contamination which could potentially impact upon human health. Significant groundwater contamination originating from the Site is not anticipated given the presence of underlying Unproductive Aquifer comprising low permeability cohesive material and any mobile phase contamination is unlikely to migrate beyond low permeability strata to deeper groundwater.

88. Potential pollutant linkages during the construction works are likely to include:

- Direct contact between construction workers and potentially contaminated shallow soils and groundwater during works to install additional foundations – Low Risk with construction workers to be provide with suitable PPE in line with their risk assessments under CDM (2015) Regulations[16];
- Spills or leaks from construction materials stored onsite reaching offsite users and ecological receptors – Low Risk with a CEMP to be produced to limit any potential spillages.
- Mobilisation of potential contamination present at shallower levels to shallow and deep groundwater due to expected intrusive works – Low Risk with a CEMP to be produced to limit any potential spillages; and
- Inhalation of potentially contaminated dust, or direct contact with run-off from stockpiled soils during the construction works to onsite and offsite users, and ecology - Low Risk with a CEMP to be produced to limit any run-off or airborne dust.

89. Potential pollutant linkages when the Proposed Development is completes and operational are likely to include:

- Chemical attack from pyrites (sulphur/sulphate) within soil and groundwater conditions to proposed below-ground structures and buried services – Low Risk the Proposed Development is to be designed to withstand any potential chemical attack; and

[16] *The Construction (Design and Management) Regulations 2015*

- Foundation piles creating a potential preferential pathway for downward migration of shallow groundwater to deeper aquifers – Low Risk – the proposed piling technique will be cognisant of any migration of contamination and the adopted technique likely to comprise CFA piles.
- The construction of the proposed hardstanding (building footprints and pavements) onsite will remove any near surface interaction of soil contamination with future site users. However, there is potential inhalation of vapours risk to future Site users given former industrial uses (depot and garage) – Low to Moderate risk with a generic quantitative risk assessment (GQRA) to be undertaken as part of intrusive ground investigation works and summarised within a report which will accompany the planning application. The GQRA will verify contamination conditions and recommendation will be provided based on the analysis of results. This will assist in deriving the final risk assessment for the Site which will identify if there are any specific remediation or mitigation measures to be implemented. A Remediation Strategy and/or Mitigation Strategy is to be secured via planning condition that will address land contamination as identified by intrusive site investigation work. With the implementation of this strategy this will reduce the risk to Low.

90. The Proposed Development will be undertaken in accordance with current best practice and therefore will not introduce new sources of contamination which could adversely impact upon ground or groundwater quality. Redevelopment of the Site will require compliance with regulatory standards in relation to contamination and therefore it is considered that the Proposed Development will have either no effect or a beneficial effect on ground and groundwater quality.

Design Measures and Mitigation

91. A ground investigation works will be undertaken to confirm the ground and groundwater conditions beneath the Site. A GQRA will be undertaken as part of the ground investigation (following on from the Phase 1 PRA (see **Appendix C**). The GQRA will be undertaken from data obtained during the ground investigation works to determine whether there are potential risks to human health from soil, groundwater, or ground gas contamination. Should potential risks be identified, then a Remediation Strategy will be developed and implemented as part of the pre-commencement enabling and construction activities associated with the Proposed Development. If contamination is identified, then it is likely that standard remedial techniques will be sufficient to mitigate the risks. At this stage, it is considered likely that remediation would comprise the use of Personal Protective Equipment (PPE) during construction, the installation of upgraded potable water supply pipes resistant to permeation by hydrocarbons and the installation of ground gas and/or vapour protection measures in the new buildings.

Conclusion

92. The Proposed Development is not considered likely to result in significant effects in relation to ground and groundwater conditions. It is considered likely that the redevelopment of the Site once operational would have beneficial effect in relation to ground and groundwater conditions as a result of future ground investigations and remediation (where required).

93. The ground investigation and accompanying GQRA will be undertaken and submitted as part of the planning application for the Proposed Development. The GQRA will determine the presence or absence of soil, groundwater, and ground gas contamination, assess any potential risks to human health or environmental receptors and if necessary, design remediation measures to protect the receptors at risk. All remediation activities will be independently verified and following completion, a Verification Report will be produced and submitted to the LBB to support the discharge of any imposed contaminated land planning conditions.

Flood Risk and Drainage

94. The consideration of potential effects on flood risk and drainage as a result of the Proposed Development has been undertaken by Curtins.

Baseline and Consideration of Potential Effects

95. The Environment Agency's (EA) indicative flood map indicates that the Site lies in Flood Zone 1 (lowest risk) and therefore has a likelihood of flooding by river or sea of less than 0.1% in any given year and is not located within 250m of any surface water features

96. The EA's online pluvial maps, shows the risk of potential surface water inundation or flooding at the Site is considered low risk.

97. A review of publicly available information contained on the British Geological Survey's (BGS) website indicates the Site is likely underlain by London Clay Formation to a depth of over 15m. Due to the impermeable nature of this strata, groundwater flooding is considered to be low risk. This aligns with the Phase 1 Preliminary Risk Assessment (RPA) (See **Appendix C**) carried out by Curtins which states the underlying strata is London Clay.

98. Mapping produced in support of the West London Strategic Flood Risk Assessment's (SFRA) also shows the Site is not located in an area of potential elevated groundwater.

99. The footprint of the Proposed Development covers the majority of the Site and as a result there is limited space for below ground attenuation structures. The Site is not located in a critical drainage area and flow controls will limit the discharge of the Proposed development in line with local guidance. The rate will be agreed with both the Lead Local Flood Authority (LLFA) at Brent Council and Thames Water.

100. The Proposed Development will also use a separate foul water system designed to Building Regulations Part H and discharging to the foul water sewer. This is to be confirmed with Thames Water.

Design, Operation and Construction Mitigation Measures

101. As part of Site enabling and demolition and construction activities the contractor will be required to produce an appropriate project specific CEMP, which will be implemented prior to and during the construction phase of the Proposed Development. The CEMP will include appropriate measures to manage any discharges of water from the Site, such as silt capture techniques, protective coverings on stockpiles, provision of spill kits, bunded perimeters around construction areas and fuel storage and locating refuelling areas away from the road. Significant effects on water quality during the demolition and construction works are therefore not considered likely.

102. As such, significant effects associated with flood risk, drainage, and water quality during demolition of the existing buildings and construction of the Proposed Development are not considered to be likely, either in relation to the Site itself or, at offsite locations.

103. The planning application will be accompanied by a Drainage Strategy which will provide an operational and maintenance strategy for the below ground drainage

Conclusion

104. The Proposed Development is not considered likely to result in significant effects in relation to flood risk and drainage. As the Proposed Development is less than 1 hectare and is located within Flood Zone 1 a site-specific Flood Risk Assessment is not required for the planning application. The planning application will be accompanied by a Drainage Strategy.

Transport and Access

105. The consideration of potential impacts on transport and access has been undertaken by Iceni Projects Ltd, who are also preparing a Transport Assessment (TA) to be submitted to support the planning application for the Proposed Development. This will include a detailed analysis of the Site from a transport and access perspective, including the necessary assessments to determine the impact on the surrounding area / highway network.

Baseline

106. A vehicular access is present immediately to the west of the Site boundary which provides access to car parking spaces and servicing areas to the rear of the Site.

107. The Site benefits from excellent connections to local public transport facilities, as indicated by its Public Transport Accessibility Level (PTAL) of 6a (the highest level). Wembley Stadium and Wembley Central rail stations are both within a close walking distance of the Site, approx. 350m and 450m respectively,

with Wembley Park London Underground (LU) station also available within a 1.5km walking distance. The rail stations provide access to Chiltern Railways at Wembley Stadium and Southern Railways / London Overground at Wembley Central, with the LU station providing Jubilee and Metropolitan line services.

108. In addition, bus stops are located along High Road on either side of the Site, the nearest of which are located approximately 70m from the Site. Further bus stops available on Park Lane and Wembley Hill Road. These bus stops provide access to a high number of bus services providing frequent buses to a range of destinations.

109. Given the location of the Site, there are a substantial number of amenities and services available within the immediate vicinity, including food shops, gyms, restaurants / bars etc. A full assessment of the connectivity of the Site to these amenities, as well as the public transport facilities, will be provided within the TA which will include an Active Travel Zone (ATZ) assessment to review the local walking and cycle routes, which includes London Cycle Network 45 on High Road.

110. In summary, there is an excellent level of existing public transport facilities and amenities / services available within the local area which will ensure future student residents of the Proposed Development will not be reliant on private car ownership.

111. A Site visit has been undertaken to inform the condition of the surrounding highway network. The footway on High Road fronting the Site is of generous width, circa 6m wide and at the time of writing this report the LBB were undertaking upgrades in the form of re-paving alongside provision of trees, street lighting and required street furniture. It is understood that this work will be completed by April 2022.

112. Along the Site frontage, High Road operates under a two-way arrangement, with one lane eastbound, and two lanes (one of which is a bus lane) westbound. Directly to the front of the Site there is an existing loading bay, which will not be impacted by the improvement works. This bay is approx. 17m long and 3m wide, and is subject to the following restrictions; “Loading only. 30 mins. No return within 1 hour”.

113. Whilst no traffic data surveys are required given the car-free proposals as detailed later in this note, there is Department for Transport (DfT) traffic count data for High Road, shown to be circa 100m east of the Site. This DfT data provides two-way motor vehicle traffic flows on High Road for 2019, (showing traffic levels pre-Covid), which are as follows:

- 2020 Eastbound Flow – 7,712
- 2020 Westbound Flow – 7,558
- 2020 Two-way Flow – 15,270

114. Of the total 11,923 vehicles, 256 were classified as heavy goods vehicles (HGVs).

Key Issues and Potential Effects

Demolition and Construction

115. During the construction phase of the Proposed Development there is likely to be a short term, temporary increase in local traffic, which will include heavy (HGVs). This increase in traffic is likely to result in some temporary, localised disruption to road users, however, these will be short term effects typical of any construction project. They will be managed through the implementation of a Demolition and Construction Logistics Plan (DCLP) and it is therefore considered that with the implementation of these secured mitigation measures, no significant long-term demolition and construction effects are anticipated.

116. The effects of construction traffic on ecology, noise and vibration and air quality including dust deposition has been considered within the relevant sections of this Request for an EIA Screening Opinion, primarily within the noise and vibration, air quality sections.

Operational

117. The Institute of Environmental Management and Assessment (IEMA) document 'Guidance Notes No.1: Guidelines for the Environmental Assessment of Road Traffic'[17] states that:

118. "Within the IEMA guidance, two broad rules are suggested which can be used as a screening process to limit the scale and extent of the assessment:

> Rule 1: include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%); and
>
> Rule 2: include any other specifically sensitive areas where traffic flows have increased by 10% or more."

119. The IEMA Guidelines also set out a number of potential environmental impacts which may require assessment, including:

- Severance;
- Delay;
- Amenity;
- Fear and Intimidation;
- Accidents and Safety; and
- Hazardous Loads.

120. 'Amenity', 'Fear' and 'Intimidation' can be considered together as they are strongly interrelated.

121. The Proposed Development for student accommodation with ground floor flexible employment and commercial use does not include for any car parking spaces, in line with the policy requirements. As such, the Proposed Development is expected to generate a very minimal level of vehicular traffic, predominantly linked to delivery and servicing vehicles. A multi-modal trip generation assessment will therefore be undertaken to determine the expected number of trips to be made by modes other than the private car, and this will be included in the TA.

122. Notwithstanding the above, and whilst it may be subject to marginal change as the scheme progresses towards a planning application submission, the initial multi-modal trip generation assessment has shown there is expected to be a total of 36 two-way vehicle trips associated with the proposed student accommodation. Of these, 22 are associated with deliveries / servicing, and the remaining 14 are student trips (taxi, car passenger and motorcycle trips). Again, a robust estimate of the Class E delivery / servicing trips (retail represents the highest potential trip generation for the proposed flexible employment and commercial uses (Use Class E) proposed at the ground floor) at this stage show there could be up to 6 two-way vehicle trips daily associated with that use. That presents a total of 42 two-way vehicle movements. Of these, a robust assumption would be that 4 of the associated vehicles (equating to 8 two-way trips) will be made by HGVs.

123. Based on the DfT data previously detailed, the 42 two-way trips associated with the Proposed Development is less than a 1% increase on the 15,270 two-way vehicle movements shown in the 2019 dataset. With regards to HGVs, the 8 two-way trips will only be a 3.1% increase on the 256 recorded in the baseline situation. The increase of flows on the local highway network falls substantially short of the recommend IEMA Guidelines[1] for requiring further assessment. Based on the above, the assessment is considered to be overly robust given it does not account for the existing vehicle trips associated with the Site that will be removed, nor the fact that the majority of these new trips will be linked trips which are already on the local highway network.

124. However, a more detailed review of each of the potential environmental impacts is undertaken below.

125. With regard to severance, given the car-free proposals, it is considered that the Proposed Development will not result in any significant level of vehicular traffic, irrespective of what the existing uses on the Site generate, as shown in the above assessment. As such, the Proposed Development is not expected

[17] *IEMA, (1993); Guidance for the Environmental Assessment of Road Traffic*

to result in changes which could detrimentally affect perceptions of severance during the Operational phase.

126. On 'Delay', the IEMA Guidelines refers to potential delays to drivers and to pedestrians, however, users of other modes can also experience delays, such as cyclists and those travelling by bus and rail. The Proposed Development is not expected to result in changes which could affect perceptions of driver delay due to the minimal level of vehicular trip generation as already noted. Similarly, with regard to bus delay, the limited vehicular traffic, along with the existing bus service provision and no proposed changes to speed limits or the road network layout would mean that no change to driver delay would be expected as a result of the Proposed Development. It is considered that the Proposed Development will result in an improvement to rail delay, and delays for pedestrians / cyclists, given the increased connectivity / permeability of the Site, and the provision of an enhanced and more pleasant environment for pedestrians and cyclists.

127. The Proposed Development is not expected to result in changes which could affect perceptions of amenity, fear and intimidation during operation. The Development can be expected to be designed to create an attractive and secure environment with increased active frontages and natural surveillance though the Site and improved pedestrian realm along the frontage.

128. Likewise, the Proposed Development is not expected to result in changes which could affect accidents and safety during operation given the car-free proposals.

129. The Proposed Development is not expected to generate or attract hazardous loads.

130. In summary, the Proposed Development is not considered likely to result in significant effects in relation to: Severance, Delay, Amenity, Fear, Intimidation, Accidents & Safety and Hazardous Loads.

131. Notwithstanding, the TA will fully assess the transport impacts of the scheme, with mitigation measures identified as appropriate. This work will be completed in close liaison with TfL and LBB.

132. Alongside the TA, a Framework Travel Plan (FTP) and a Delivery and Servicing Plan (DSP) will also be produced in support of the planning application. These documents will consider the impact of the development on all modes of transport, and detail any mitigation that is considered necessary, regarding both onsite and offsite impacts.

133. Given the existing level of public transport infrastructure available within the vicinity of the Site, reflected by the PTAL rating of 6a (the highest level), it is considered unlikely that the proposed development will result in any significant impact on these services. A full assessment of public transport impacts will be undertaken and provided within the TA.

Design Measures and Mitigation

134. Increases in traffic generated during the construction period will be mitigated through best practice construction methods which will be detailed within a DCLP subject to approval by the LBB and secured through an appropriate planning condition(s).

135. The car-free proposals ensure that there would be no substantial increase in vehicular traffic generated over the course of the day following the redevelopment of the Site. There will be associated delivery and servicing trips, which will be fully assessed within the TA, but these will be limited, spread across the day, and predominantly form part of linked trips i.e. the vehicle is already on the highway network making a delivery to other locations nearby.

136. The servicing vehicles will be accommodated in line with the existing arrangements and via use of the existing loading bay to the Site frontage. This will be detailed in full in the associated TA / DSP, with appropriate management measures set out.

137. The Proposed Development will result in the generation of multi-modal trips by sustainable modes such as public transport, walking and cycling. However, the TA will include an assessment of these trips and will determine whether any mitigation is required. For public transport, this will include a 'Public Transport Impact Assessment' which will determine whether the existing capacity on the services is sufficient to accommodate the new trips, or if improvements will be required. For walking and cycling, the TA will include the ATZ assessment which will assess the existing pedestrian and cycle links to key

destinations and suggest improvements that are considered necessary. Both of these assessments will be discussed and agreed with both the LBB and TfL.

138. Lastly, the Proposed Development will also incorporate cycle parking provision for students, employees and visitors, which will further promote the use of cycling as a mode of travel. Details on the type and number of cycle parking spaces will be provided within the TA.

Conclusion

139. The Proposed Development is not considered likely to result in significant effects in relation to transport and access. A Transport Assessment (including draft Travel Plans, Delivery and Servicing Plan and Construction Logistics Plan) will be submitted to accompany the planning application.

Air Quality

140. The consideration of potential impacts on air quality has been undertaken by Air Quality Consultants Ltd, who are also preparing an Air Quality Assessment to be submitted to support the planning application for the Proposed Development.

Baseline

141. The Site lies within an AQMA declared by LBB for exceedances of the annual mean nitrogen dioxide (NO_2) and 24-hour mean particulate matter (PM_{10}) objectives. The Site is also located approximately 50m to the east of the *'Wembley High Road from Ealing Road to Park Lane'* air quality Focus Area, one of 187 areas identified by the Greater London Authority (GLA)[18] as locations that not only exceed the annual limit value for NO_2, but also have high levels of human exposure.

142. A review of the LBB's 2020 Annual Status Report (ASR)[19] indicates that annual mean concentrations of NO_2 within 1km of the Site exceeded the objective in 2019. 2020 data are available within the ASR; however, it should be treated with caution due to the impact of the COVID-19 pandemic on measured pollutant concentrations as a result of reduced activity and traffic volumes.

143. The closest sensitive receptors which may be affected by the Proposed Development are the residential properties located approximately 10m to the west along High Road and 40m to the east of the Site at 370 – 386 High Road.

Key Issues and Potential Effects

Demolition and Construction

144. Machinery and plant used during demolition and construction can generate emissions including dust, particulate matter and NO_2, in addition to construction traffic movements to and from the Site. The demolition and construction works themselves can also generate dust and particulate matter.

145. The Institute of Air Quality Management (IAQM) guidance[20], on which the GLA's Supplementary Planning Guidance (SPG) on 'The Control Dust and Emissions from Construction and Demolition' is based[21], provides a method for assessing the risk from construction dust on nearby sensitive receptors. This risk-based assessment allows the potential level of risk from the demolition and construction activities associated with the Proposed Development to be identified, which then allows for the appropriate level of mitigation required to be determined.

146. As presented within the baseline, the nearest residential properties to the Site are located approximately 10m to the west, with further residential properties located to the east. It should be noted that the annual mean air quality objectives do not apply at commercial properties, such as the adjacent boxing club and restaurants, where members of the public are unlikely to be regularly present.

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[18] Air quality Focus Areas are locations with high levels of human exposure where the EU annual mean limit value for NO_2 is exceeded.
[19] London Borough of Brent (2021) Air Quality Annual Status Report for 2020.
[20] IAQM (2016) Guidance on the Assessment of Dust from Demolition and Construction v1.1, Available: http://iaqm.co.uk/guidance/.
[21] GLA (2014) The Control of Dust and Emissions from Construction and Demolition SPG, Available: https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/control-dust-and.

147. With regards to ecological receptors, the guidance from the IAQM[20] also states that designated ecological sites within 50m of the Site have the potential to be impacted by the construction works. There are no designated ecological sites within 50m of the Site boundary, or those roads along which material may be tracked, such as Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Sites of Specific Scientific Interest (SSSI); however, the Chiltern Lines Site of Importance for Nature Conservation (SINC) is located within 50m the Site to the north. This ecological site is a low sensitivity receptor, however, the impacts of construction works upon it will be assessed and mitigated accordingly.

148. The appropriately determined mitigation will be secured through a standard CEMP, which will include a Dust Management Plan (DMP). A CEMP would be secured by a suitably worded planning condition, to be agreed with LBB. This will include standard measures to control emissions and may include monitoring of dust deposition and/or visual inspections. With appropriate mitigation in place, the guidance is clear that the residual effect should normally be 'not significant'.

149. In addition to emissions from the works themselves, construction traffic will lead to temporary changes in traffic flows on the existing local road network, which may impact upon air quality at existing properties. As the Proposed Development is located within an AQMA, the 'Land-Use Planning and Development Control: Planning for Air Quality v1.2' guidance[22] published by Environmental Protection UK (EPUK) and the IAQM recommends that, where the annual average number of Heavy-Duty Vehicle (HDV) movements is greater than 25 vehicles per day (as an Annual Average Daily Traffic (AADT) flow), a more detailed assessment of the impacts of construction traffic is required. However, given the scale of the Proposed Development, it is unlikely that there will be an average of more than 25 HDV movements per day. Additionally, a Construction Logistics Plan (CLP) will be implemented, to ensure that vehicles movements are appropriately managed. Taking these aspects into account, it is judged that the impact of construction traffic emissions upon local air quality will be 'not significant'.

Completed Development

150. The Proposed Development will be a 'car-free' scheme and the majority of associated vehicular movements will be attributable to servicing and deliveries, with a small number of movements associated with the proposed student accommodation. An initial review of trip generation has indicated that the development would generate up to 42 two-way vehicle trips, of which a maximum of 8 would be HGV. On this basis, it is anticipated that development-generated road traffic can be screened out of the assessment as their volumes will be below screening criteria for within an AQMA, published by EPUK/IAQM. This will, however, be confirmed once the Transport Assessment for the Proposed Development has been undertaken. Any changes to these numbers will be summarised and included within the Air Quality Assessment which will support the planning application.

151. The Proposed Development will include roof-mounted Air-Source Heat Pumps (ASHP) systems for the provision of heat and hot water, supplemented by a back-up emergency diesel generator. ASHP systems do not have any emissions associated with them, and thus can be screened out of the assessment. The emissions from the emergency diesel generator could, however, impact on local air quality conditions at existing (and introduced) receptors, and as such consideration will need to be given to their emissions, taking into account of the engine specification and testing regime.

152. As the Site is located within an AQMA, consideration also needs to be given to the potential effects on the new sensitive receptors (i.e., student residential receptors) introduced within the Proposed Development. The design of the Proposed Development will, however, ensure that the new residents and users are not exposed to unacceptable air quality, so that any significant effects are minimised.

153. The GLA's London Plan[23] requires new developments to be at least 'air quality neutral'. The air quality neutral policy is intended to minimise the cumulative impacts of many developments throughout London. The air quality neutrality of the Proposed Development will, therefore, be addressed following the methodology provided in the GLA's Supplementary Planning Document (SPD) on 'Sustainable

[22] *Moorcroft and Barrowcliffe et al (2017) Land-Use Planning & Development Control: Planning For Air Quality v1.2, IAQM, London, Available: http://iaqm.co.uk/guidance/.*
[23] *GLA (2021) The London Plan: The Spatial Development Strategy for London, Available: https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf*

Design and Construction'[24]. Appropriate mitigation will be recommended, if required, to ensure that the Proposed Development meets the air quality neutral requirement of the SPD.

154. Additionally, Part C of Policy SI 1 on 'Improving Air Quality' within the London Plan[23] introduces the concept of Air Quality Positive for large-scale development subject to Environmental Impact Assessment (EIA). It is anticipated that the Proposed Development will not be subject to an EIA, thus an Air Quality Positive statement will not be required.

Design Measures and Mitigation

155. In terms of measures to minimise emissions associated with the Proposed Development, the Proposed Development will utilise all-electric ASHP systems for the provision of heat and hot water to the building. As previously discussed, the Proposed Development will include an emergency diesel generator for the provision of essential power to the building in emergencies. The location, height and setting of the generator flue, alongside the testing and maintenance regime, will be carefully considered so as to ensure that there will be no significant impacts upon local air quality.

156. Flexible employment and commercial units will be located at ground-floor level with more sensitive student accommodation uses located at first floor and above, increasing the distance between sensitive receptors and sources of pollution (i.e., road traffic emissions). Additionally, as previously discussed, the Proposed Development is a 'car-free' development.

Conclusion

157. The Proposed Development is not considered likely to result in significant effects in relation to air quality. An Air Quality Assessment and Air Quality Neutral Assessment will be submitted to support the planning application.

Noise and Vibration

158. The potential for effects due to noise and vibration arising as a result of the Proposed Development have been considered by Sandy Brown.

Baseline

159. The Site location in relation to its surroundings is shown in Figure 5 outlined in red. Baseline noise monitoring (**Appendix D** – Acoustic Survey Report) has been undertaken in February 2022, a period when all Government mandated restrictions on movement relating to the Covid-19 pandemic have ended.

160. The existing environmental noise climate at the Site is dominated by road traffic noise from the surrounding road network and to a lesser extent the railway traffic. The Chiltern Railways line, at surface level, approximately 50m north of the Site, runs east to west between Wembley Stadium station and Sudbury & Harrow Road station. This is the key environmental vibration source considered for the Proposed Development.

[24] *GLA (2014) Sustainable Design and Construction Supplementary Planning Guidance, Available: https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/sustainable-design-and.*

Figure 5 Aerial view of the Site (courtesy of Google Earth Pro)

Noise Sensitive Receptors

161. The Site is adjacent to the following premises:

- Mixed residential and commercial premises on High Road (highlighted in yellow in Figure 5);
- Ujima House – Commercial (highlighted in green in Figure 5, cumulative scheme with Planning Ref. 19/3092);
- Best Western Hotel (highlighted in blue in Figure 5);
- Lanmore House – Residential and commercial (highlighted in orange in Figure 5) ;
- Proposed residential premises – Wembley Link (highlighted in cyan in Figure 5 with Planning Ref. 18/3111); and
- Proposed residential premises – Land at Juncture of Cecil Ave & High Road (highlighted in Brown in Figure 5 with Planning Ref. 19/2891).

162. These sensitive receptors have the potential to be affected by noise and vibration from the Proposed Development due to their proximity to the Site.

163. The Proposed Development will also introduce student accommodation and employment generating uses, that will be considered as sensitive receptors within a site suitability assessment.

Noise Baseline

164. An environmental noise survey has been carried out to determine the existing sound levels in the area (**Appendix D**). The noise survey was carried out between 12:30 on 3 February 2022 and 13:30 on 8 February 2022. Data from the survey has been used to determine the baseline conditions.

165. The representative background sound levels measured during the survey were $L_{A90,15min}$ 53 dB during the daytime and $L_{A90,15min}$ 44 dB at night at position 'A' (overlooking High Road), and $L_{A90,15min}$ 48 dB during the daytime and $L_{A90,15min}$ 42 dB at night at position 'B' (overlooking the railway line to the north).

166. Attended measurements were undertaken at positions labelled '1' to '4' in Figure 5.

167. Measured ambient noise levels were in the range of $L_{Aeq,5min}$ 56-79 dB during the day. The average ambient noise levels measured during the unattended survey were $L_{Aeq,16h}$ 58 dB during the daytime and $L_{Aeq,8h}$ 52 dB at night.

168. Data from the survey will also be used to inform the design of the development with respect to noise egress from building services plant and environmental noise ingress through the building envelope.

Vibration Baseline

169. An environmental vibration survey has been carried out to determine the existing vibration levels in the area Key Issues and Potential Effects. The vibration survey was carried out 21 February 2022 at position 'V'. This measurement position was chosen to avoid interference from construction activities at Wembley Link. Data from the survey has been used to determine the baseline conditions.

170. Based on review of published train timetables and the vibration measurement results, the equivalent vibration dose value (VDV) at position 'V', over a 16 hour daytime period and 8 hour night period have been predicted, as summarised below.

- Equivalent VDV daytime (16 hour): 0.14 $m/s^{1.75}$
- Equivalent VDV night-time (8 hour): 0.08 $m/s^{1.75}$.

171. The predicted equivalent VDV over daytime and night-time periods are both below the respective criteria of 0.2 $m/s^{1.75}$ and 0.1 $m/s^{1.75}$.

172. Assessment of re-radiated ground-borne noise has been carried out based on; the building comprises a heavyweight construction (ie, steel and/or concrete) supported on piles; there will not be significant changes to the nearby railway lines in terms of arrangement, track, rolling stock or operation.

173. The predicted re-radiated ground-borne noise levels for ground floor and first floor levels are summarised below. Re-radiated noise levels would be lower than this at higher levels within the building.

- Ground floor ground-borne predicted re-radiated noise levels, L_{ASmax} 11-28 dB
- First floor ground-borne predicted re-radiated noise levels, L_{ASmax} 9-25 dB.

174. Predicted ground-borne re-radiated noise levels due to passing trains are below the criterion of L_{ASmax} 35 dB.

175. Both tactile vibration and ground-borne re-radiated noise are below their respective assessment criteria and therefore vibration from passing trains are not considered to be an issue for the Proposed Development.

Key Issues and Potential Effects

176. The potentially significant effects to be considered at nearby sensitive receptors comprise those during the (temporary) demolition/construction phase and those during the (permanent) operational phase of the Proposed Development. The potential effects of the Proposed Development are as follows:

- Effects due to noise and vibration from demolition and construction (including substructure works);
- Effects due to noise and vibration from the operation of building services plant equipment;
- Effects due to noise from the proposed commercial uses; and
- Effects due to changes in road traffic noise on the local road network.

177. Potential effects due to noise and vibration from construction traffic on the local road network and due to noise from servicing vehicles that form part of the operation of the Proposed Development are not expected to be significant where managed effectively through the CEMP and servicing plans, including restrictions to the time of day that these vehicle movements occur.

178. Effects due to existing levels of noise on the permanent operation of the Proposed Development will be considered as part of the detailed design of the Proposed Development. Where good acoustic design practice is followed throughout the design and construction stages, the effects on the future occupants due to existing noise sources are not expected to be significant.

Demolition and Construction

179. Noise and vibration due to demolition and construction will need to be managed to avoid significant effects at the nearby sensitive receptors, though any effects would be local, direct and temporary in their nature. It is expected that, should planning permission be granted, there will be a planning

condition requiring the preparation of a CEMP for the LBB approval. This is likely to require assessment of construction noise and vibration, accounting for the likely demolition/construction methodologies, major activities, and expected programme. The level of demolition/construction noise and vibration at the nearest sensitive receptors will then be assessed by the Contractor following guidance within BS 5228:2009+A1:2014[25].

180. Appropriate noise and vibration mitigation measures will need to be considered by the Contractor where the potential significant effect at existing sensitive receptors is identified. Mitigation measures would then be included as part of a CEMP, with the aim of reducing adverse effects and avoiding adverse effects and protecting the amenity of nearby receptors.

Operational: Noise from building services plant equipment

181. The potential effects due to noise from primary building services plant equipment associated with the Proposed Development will need to be controlled in order to avoid affecting existing sensitive receptors and the proposed sensitive uses within the Proposed Development itself. It is expected that noise from building services would be assessed in accordance with BS 4142:2014+A1:2019[26].

182. Plant noise egress limits will be derived using representative background sound levels for the nearby sensitive receptors and accordance with the LBB requirements. In line with the Brent Local Plan[27] it is understood that plant noise egress should be controlled to a level at least 10 dB below the existing background sound level at the nearest noise sensitive receptor.

183. Noise limits will also be determined for the new sensitive uses within the Proposed Development. Noise control measures will be identified to achieve these noise limits and to avoid adverse effects. Therefore, the effects due to noise from building services plant equipment are not expected to be significant.

Operational: Noise from commercial uses

184. The potential effects due to noise from the proposed potential commercial uses could affect existing nearby sensitive receptors. It is expected that the use of these premises will be subject to obligations for the tenant as well as controls through the LBB licencing authority (including hours of use). Noise egress through the proposed building envelope and noise transfer within the building will need to be considered as part of the detailed design stages. Significant adverse effects will be avoided through appropriate specification of the building envelope, internal elements and, where necessary, appropriate internal noise limits within commercial spaces.

Operational: Changes in road traffic noise

185. Changes in road traffic noise levels as a result of the Proposed Development once completed may occur. In order to assess this quantitatively, traffic data for the 'with development' and 'without development' scenarios in the year of construction completion would be required. A percentage change in traffic volume of around 20 to 25% is required to result in a 1 dB change in road traffic noise (when speeds and traffic composition remain the same).

186. The EIA Transport screening document indicates less than a 1% increase in two-way vehicle movements and a 3.1% increase in two-way HGV movements on High Road, associated with the Proposed Development. These increases would not lead to an increase in the noise level from road traffic from High Road.

Site Suitability

187. The suitability of the Site for the Proposed Development will be assessed as part of the detailed design process with reference to internal and external noise guidelines, and internal vibration guidelines within best practice guidance and standards.

188. Internal noise level criteria will be established for each proposed use and the suitable methods of ventilating the building will be determined along with outline specifications for the building envelope. No significant effects will occur where internal noise level criteria are achieved upon completion. An

[25] *BS 5228:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise*
[26] *BS 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound*
[27] *London Borough of Brent Local Plan. https://www.brent.gov.uk/localplan*

assessment of the expected level of internal and external noise at relevant parts of the Proposed Development will form part of the Noise and Vibration Impact Assessment submitted in support of the planning application.

189. Internal vibration level criteria will be established for each proposed use. No significant effects will occur where vibration level criteria are achieved upon completion. An assessment of the expected level of vibration at relevant parts of the Proposed Development will form part of the Noise and Vibration Impact Assessment submitted in support of the planning application.

Conclusion

190. Subject to the control measures described above and the provision of appropriately worded planning conditions, the Proposed Development is not considered likely to result in significant effects in relation to noise and vibration.

191. A stand-alone Noise and Vibration Impact Assessment will be submitted in support of the planning application. This will set out the internal and external noise level criteria, and internal vibration criteria to be achieved upon completion an assessment of site suitability from an environmental noise and vibration perspective, and a description of the expected mitigation measures required to achieve these criteria.

Townscape, Visual, Built Heritage Assessment

192. The consideration of potential impacts on townscape, visual impact and built heritage has been undertaken by The Townscape Consultancy who are also preparing an HTVIA to be submitted alongside the planning application for the Proposed Development.

Baseline

193. The existing structures on the Site comprises two 20th century office buildings with retail units on ground, one a simple red brick 3 storey building and the second building a 7-storey yellow brick building set perpendicular to the street, featuring an element of cantilever over the High Street.

194. The Site's location on High Road forms part of a single high street route which has evolved into a more complex high street network with secondary routes and spaces.

195. Taller buildings are emerging in the immediate context, including the recently completed 26-storey UNCLE Wembley development (approx. 150m west) and a large number of taller buildings set around Wembley Stadium forming Wembley Masterplan (Planning Ref. 15/5550), at its closest point 400m north east of the Site.

196. Site visits were undertaken by the Townscape Consultancy in December 2021 and January 2022. As a result of these site visits, 14 townscape views have been identified and the heritage assets within a 1km radius mapped and those assets to be assessed have been identified. A 1km radius for assessing heritage is considered appropriate in a dense urban context where intervisibility is limited owing to the scale of intervening townscape.

197. The maps attached identifies the 14 views identified for assessment and the heritage assets identified for assessment as part of the HTVIA.

198. The Site is not located within a Conservation Area, and there are no listed or locally listed buildings on the Site. There are several heritage assets within a 1km radius of the Site. These are identified within **Appendix E**.

199. As the closest heritage asset is 250m away, it is considered that the Site does not lie within a heritage sensitive area. The Site does not contribute to the setting of any of the heritage assets identified within the study area.

200. The following assets are within proximity of the Site and are shown within **Appendix E**. These will be assessed as part of the HTVIA for the planning application:

- Wembley Arena (Grade II Building) (Map ref 1);
- Roman Catholic Church of St. Joseph (Grade II Building) (Map ref 4);

- No. 324 Harrow Road (Locally listed Building) (map ref 10);
- Wembley High Street Conservation Area (Map ref A); and
- King Edward VII Park (Locally listed Park) (Map ref i).

Key Issues and Potential Effects

201. Demolition and construction activities may cause indirect effects on townscape, visual and heritage receptors as a result of a change to the receptor's setting. This will largely be limited to visibility of equipment associated with construction (cranes, hoarding, etc.). The effects during demolition / construction will be temporary and will transition in magnitude between those of the existing Site to those of the completed development. As such the assessment of townscape, visual and heritage effects as a result of the completed development should be considered as the worst-case scenario.

202. The Proposed Development would rise to a maximum height of up to 17 storeys. The height would not be dissimilar to that of recently completed and emerging buildings situated in the immediate and wider locality i.e., broadly consistent with the existing and emerging townscape and visual character of the surrounding area. The planning application will be supported by a HTVIA, the key issues to be addressed by the HTVIA will be:

- The effect of the Proposed Development on views within the local and wider area;
- The effect of the Proposed Development on townscape character;
- The effect of the Proposed Development on the setting of above-ground built heritage assets (excluding archaeology)

203. The extent and magnitude of change caused by the Proposed Development would be limited in respect of townscape and views. There is some potential for adverse environmental effects in respect of short to medium range views - as would likely be the case for all but the smallest developments in views at such distances. It is anticipated that these effects would not extend much beyond the local area around the Site.

204. Ultimately the provision of a new building as part of the Proposed Development would have the potential to alter the existing townscape character and quality of the Site as well as the surrounding townscape study area. It is considered it will be an enhancement to the heritage assets to the east of the Site, through its high-quality architecture. Therefore, significant effects on the townscape and heritage assets are considered unlikely.

205. In respect of heritage, there is the potential for some environmental effects due to the location of heritage assets within the 1km radius of the Site. It should be noted that large scale modern development is part of the wider context in which these are experienced today, and therefore potential for significant effects is considered limited. It is expected that the Proposed Development would not cause harm to any heritage assets through a change in their setting. This will be as a consequence of replacing existing low-quality buildings with a scheme of high-quality architecture and urban design, which will open the Site up to its surroundings and engage positively with Wembley's High Road.

206. A HTVIA would be produced as a stand-alone report and this would consider the effect of the Proposed Development on a range of views, areas of townscape around the Site, and the settings of aboveground heritage assets in the local area. The HTVIA will include a range of accurate visual representations of the proposed Development (produced by a specialist visualisation company). The HTVIA will be undertaken in accordance with the Townscape Consultancy's methodology which is written in line with the following planning legislation, policy and guidance:

- National Planning Policy Framework (2021)
- Planning Practice Guidance, last updated June 2021
- The National Design Guide 2019
- The London Plan 2021
- Brent Local Plan 2019-2041
- Historic England: Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (March 2015).

- The Setting of Heritage Assets: Historic England: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) December 2017
- Historic England Advice Note 4 - Tall Buildings (2022)
- Historic England Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage assets (October 2019)

Conclusion

207. The Proposed Development is not considered likely to result in significant effects in relation to townscape, visual impact and heritage, however, the effects of the Proposed Development will be assessed in a HTVIA, to be submitted as a standalone report which will support the planning application.

Archaeology

208. The consideration of potential effects on archaeological remains as result of the Proposed Development has been undertaken by Oxford Archaeology. The Request for an EIA Screening Opinion is accompanied by an archaeological desk-based assessment (DBA) (see **Appendix D**) A 500m study area was considered to adequately characterise the likely archaeological conditions within the Site. Greater London Historic Environment Record (GLHER) data was obtained in January 2022 and that data has been examined for the preparation of the archaeological DBA.

Baseline

209. According to the British Geological Survey the underlying bedrock geology is clay, silt and sand of the London Clay Formation, sedimentary bedrock formed approximately 48–56 million years ago in the Palaeogene period. No overlying superficial deposits are recorded. The soils within the Site are recorded as slowly permeable, seasonally wet and slightly acid but base-rich loamy and clayey soils.

210. No designated heritage assets are recorded within the Site, and only one listed building is located within the study area. The Roman Catholic Church of St Joseph is situated approx. 225m southeast of the Site and is a Grade II listed post-war church in a loosely neo-Georgian style with Romanesque influences, built in 1955–7 to designs by Reynolds and Scott. The current modern church replaced a small late 19th-century building that was originally used as a cemetery chapel, serving the small cemetery located at the end of Waverley Avenue.

211. No previous archaeological investigations have been carried out within the Site's redline boundary. The GLHER records 15 investigations within the surrounding study area comprising six desk-based assessments, three evaluations and six watching briefs. No significant archaeological remains were encountered during the six watching briefs (carried out in the northeast of the study in the area of Wembley Stadium, all of which revealed made-ground deposits related to 20th-century development overlying the natural London Clay. Archaeological evaluation at 34 Wembley Hill Road, approx. 375m northeast of the Site, revealed a sequence of alluvial deposits but no archaeological features or finds.

212. The Site and surrounding study area are situated on London Clay. Limited archaeological evidence of prehistoric activity has been identified on the claylands of north London and the wider London Clay zone, which contrasts with the abundance of sites recorded on the gravels of the River Thames and its tributaries.

213. No heritage assets of specific prehistoric date have been recorded within the Site or study area by the GLHER, however, a single shard of late Bronze Age pottery was recovered from a shallow modern pit excavated during an evaluation at the Ark Elvin Academy (formerly Copland Community School), approx. 225m southeast of the Site. Although residual within a modern feature, the pottery provides some, albeit very limited, evidence of a low-level and perhaps transitory presence in the wider landscape during the late Bronze Age period.

214. During the Roman period, Wembley was situated to the northwest of the Roman settlement of *Londinium* and west of the Roman road Watling Street. No heritage assets indicative of Roman activity have been recorded within the Site or the 500m study area, which is consistent with the more general absence of evidence for Roman settlement on the clay-topped high ground of north London, possibly reflecting the well-wooded nature of the landscape in the period.

215. Wembley is likely to have developed from a small Saxon settlement, a sub-manor of the ancient parish of Harrow. The first documentary reference of Wembley or 'Wemba Lea'—meaning 'Wemba's clearing'—is from a charter dated AD 825. There is no specific mention of Wembley in the Domesday Book (1086), though it records the settlement at Harrow, located in the Hundred of Gore in the county of Middlesex.

216. During the medieval period, the parish of Harrow (also known as Harrow on the Hill) comprised 12 centres of settlement, of which Wembley was one, located in the southeast of the parish. The medieval settlement of Wembley lay on the north side of a large triangular green on the top of Wembley Hill, approx. 260m to the north of the Site, and is known to have had well-wooded surroundings. High Road, Wembley, which runs directly south of the Site and continues to the west and southeast as Harrow Road, is likely to have medieval, if not late Saxon, origins.

217. At the end of the medieval period, the Site and surrounding landscape was part of a large open field system that was served by scattered farmsteads The agricultural nature of the landscape during the medieval period is reiterated by the results of archaeological investigations carried out within the study area, in particular a 2008 evaluation at the Ark Elvin Academy approx. 225m southeast of the Site in which medieval remains comprising a shallow gully and shallow parallel ditch, both containing 12th to 14th-century pottery, were recorded and considered to have been related to land drainage.

218. The rural settlement character of the study area continued from the medieval period into the early post-medieval period. This is reiterated by the recording of several types of land drains during the 2008 evaluation at the Ark Elvin Academy (formerly Copland Community School).

219. The Site remained much the same at the end of the 19th century, as illustrated by the 1896 OS map which also indicates that a number of properties had been developed in the vicinity by this time. The Site itself does not appear to have undergone any significant changes, though a new route of the Great Central Railway had been constructed by the time of the 1914 OS map and the area directly north of the Site formed part of the associated embankment. The Site remained undeveloped until the mid-1950s when a depot was constructed at 390–400 High Road, occupying the eastern half of the Site. By 1968, 402–406 High Road (Pitman House) had been constructed in the west of the Site, while the adjacent depot had undergone some modifications. The east of the Site had been redeveloped by the early 1980s into its current form (Fairgate House).

Key Issues and Potential Effects

220. As outlined above the Site has a generally low potential to contain prehistoric, Roman or medieval deposits. Any deposits within the Site are likely to have been damaged or removed by the 20th century development of the Site. It is possible, if present, archaeological remains may survive in the less disturbed areas of the Site, notably around the Site boundary and in the north-west part of the Site. Any such deposits are likely to have been disturbed by the insertion of the modern services which the Site visit suggested are likely to be present within this part of the Site.

221. The potential impacts resulting from the Proposed Development would be dependent upon the nature of the groundworks and the exact construction methodology. It is anticipated that the Proposed Development could result in groundworks associated with some or all of the following activities:

- Demolition and clearance of the existing buildings;
- Landscaping and grading of the Site to create level ground;
- Excavation of foundation trenches and installation of piling caps for the foundations of the new buildings;
- Excavation of trenches for new services, soakaways and other attenuation features;
- Ground modification for infrastructure; and
- Any other intrusive groundworks.

222. No basement is proposed as part of the Proposed Development.

223. Given the likely low potential of the area and the disturbance from the 20th-century development of the Site, it is unlikely that there will be significant surviving below-ground archaeological remains across

much of the Site and the Proposed Development is therefore considered unlikely to have any significant archaeological impact.

Design Measures and Mitigation

224. The effect of the Proposed Development on potential archaeological remains will be a material consideration in the determination of a submitted planning application. This DBA (see **Appendix D**) has not identified any archaeological remains of sufficient importance to prevent or significantly constrain the development of the Site, which has been developed since the mid-1950s. Redevelopment of the Site has potential to have an adverse impact upon any surviving archaeological remains that may be present. However, this report has demonstrated that the Site has low potential to contain archaeological deposits predating the medieval period and has suggested that any later deposits are likely to have been at least partially disturbed/truncated by 20th-century development. On the basis of the low potential of the Site and the likelihood that any deposits that may have been present are likely to have been significantly affected by the post-war development of the Site it is suggested that there is no requirement for further archaeological surveys or mitigation measures associated with the Proposed Development of the Site.

Conclusion

225. The Proposed Development is not considered likely to result in significant effects in relation to archaeology. The Archaeological DBA has been appended to this Request for an EIA Screening Opinion (see **Appendix B**).

Microclimate – Daylight Sunlight, Overshadowing, Solar Glare and Light Pollution.

226. The consideration of the potential effects on Daylight, Sunlight and Overshadowing at nearby sensitive receptors as a result of the Proposed Development is being undertaken by GIA.

227. The assessments will cover daylight receptors, undertaking Vertical Sky Component (VSC) and No Sky Line (NSL) methodologies. The sunlight methodology will comprise Annual Probable Sunlight Hours (APSH) and Overshadowing methodology that adopts the Sun Hours On the Ground (SHOG) assessments. These will form part of the Daylight and Sunlight Report to be submitted in support of the planning application and will provide a comprehensive technical analysis.

Baseline

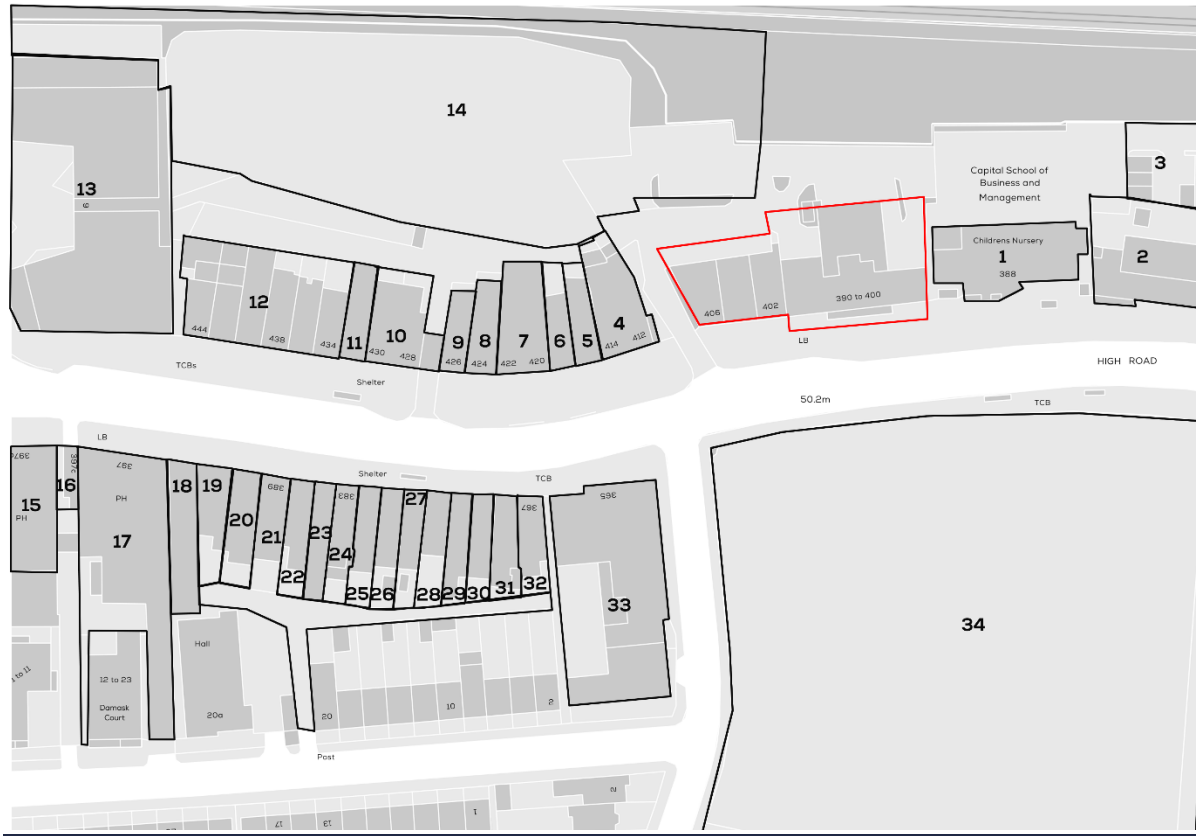
228. BRE Guidelines[28] suggests that only neighbouring residential buildings, or other sensitive uses, require consideration in terms of daylight and sunlight. As such, a review of sensitive neighbouring buildings in the surrounding context has been undertaken which have the potential to be affected in terms of daylight and sunlight. BRE Guidelines also notes that outdoor amenity spaces are sensitive to changes in overshadowing, which are therefore also considered.

229. Those existing buildings that contain sensitive uses and form part of the baseline condition are listed below and illustrated on Figure 6:

- (**2**) Lanmore House (Residential);
- (**3**) 26-29 Ecclestone Place (Mixed Use);
- (**5-12**) 416-444 (evens) Wembley High Street (Mixed Use);
- (**15-32**) 367-397 (odds) Wembley High Street (Mixed Use);
- (**13**) Chesterfield House (Residential);
- (**33**) Best Western (Hotel); and
- (**34**) Ark Elvin Academy (Educational).

[28] *Building Research Establishment 'Site Layout Planning for Daylight and Sunlight - A Guide to Good Practice 2nd Edition, 2011 (BRE Guidelines).*

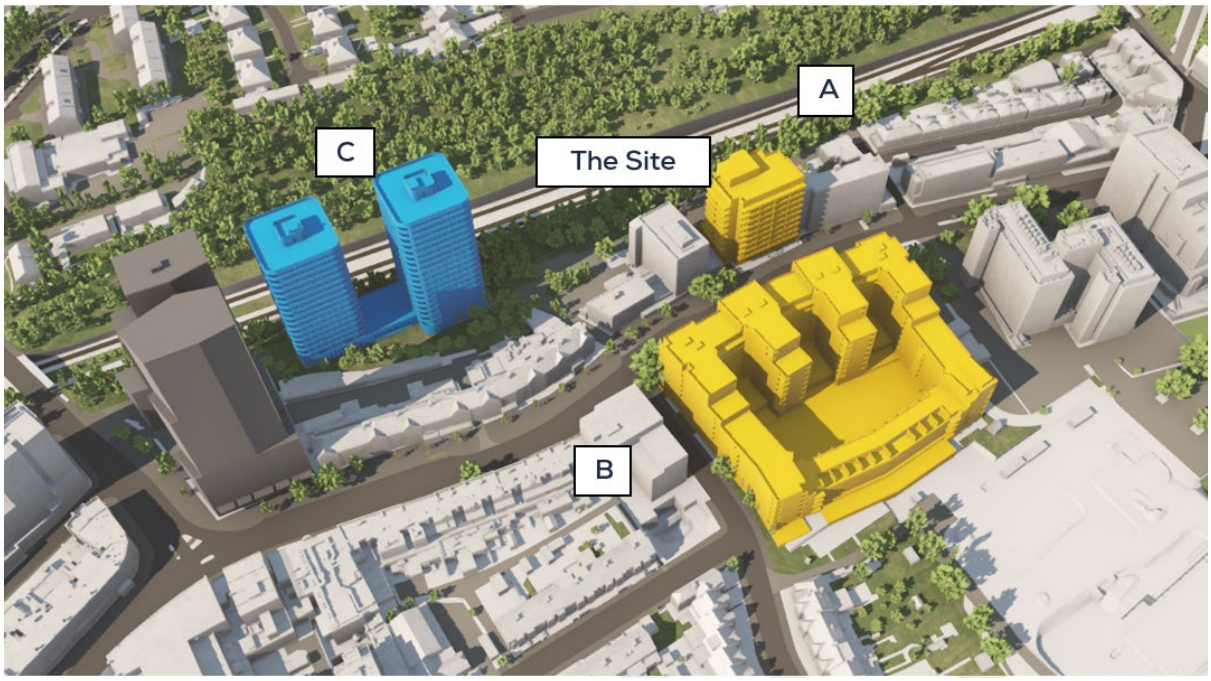
Figure 6 Existing Baseline Receptors



230. There are a number of consented emerging residential developments surrounding the Site as shown in Figure 7. As these schemes are consented and, in some cases, already under construction, they would form part of a Future Baseline in against which the impacts of the Proposed Development would be considered. These emerging residential developments would be considered in combination with the existing buildings described above. These cumulative schemes include:

- (**A**) Ujima House, 388 High Road, Wembley, (Residential) - Planning Ref. 19/3092;
- (**B**) Land at Juncture of Cecil Ave & High Road (Residential) – Planning Ref. 19/2891; and
- (**C**) Wembley Link, Land, garages, alleyway rear of 416-444, High Road, Wembley, HA9 (Residential) **-** Planning Ref. 18/3111.

Figure 7 Emerging Residential Receptors



231. In terms of overshadowing, there are no outdoor areas of amenity which require consideration in the baseline condition. Any amenity space associated with those consented schemes located south of the Proposed Development would not be affected by the Proposed Development. There is potential for amenity space associated with the consented Wembley Link (Indicated C in Figure 7), located northwest of the Site, to be overshadowed by the Proposed Development which will therefore be considered in the standalone Daylight and Sunlight Report.

Key Issues and Potential Effects

Daylight and Sunlight to Existing Residential Neighbours

232. Sensitive existing residential neighbours in proximity to the Site, include Lanmore House and Wembley High Street, have predominantly north/south facing windows, and therefore would only have an oblique view of the Proposed Development. Those sensitive buildings further away, Ecclestone Place, Chesterfield House and Ark Elvin Academy would see the Proposed Development only from a distance which would therefore not cause a continuous obstruction. Whilst isolated impacts may occur, it is considered that these would not be meaningfully beyond BRE Guidelines and would be commensurate with an area undergoing regeneration. The closest building to the Site, Best Western, is of commercial hotel use and of lower sensitivity. Therefore, no significant daylight and sunlight effects to existing residential receptors are anticipated. The impacts will be reported in the Standalone Daylight and Sunlight Report.

Daylight and Sunlight to Consented Future Residential Neighbours

233. The impact of the Proposed Development upon future consented schemes also requires consideration. It is likely that the Proposed Development would result in reductions to the levels of daylight and sunlight within these three future residential buildings. Additionally, all three future residential neighbours, in particular Ujima House, overlook the current low-rise Site, which is allocated for re-development under local planning policy, and so levels of light within these consented schemes were approved in the knowledge that taller massing on at the Site is likely to come forward in the future. Therefore, daylight and sunlight impacts to future residential receptors are anticipated, in line with the Site's allocation, and will be reported in the Standalone Daylight and Sunlight Report.

Overshadowing

234. In terms of overshadowing, no existing sensitive outdoor areas of amenity have been identified which are in close enough proximity to be affected by the Proposed Development and so no significant overshadowing effects are anticipated. Amenity space associated with Wembley Link may be affected by shadow form the Proposed Development and will therefore be considered within the Standalone Daylight and Sunlight Report.

Solar Glare and Light Pollution

235. Solar Glare and Light Pollution are not considered to be key issues in relation to the Proposed Development. The Proposed Development does not intend to comprise large areas of glazed or reflective material, as such, the risk of solar glare towards nearby roads or rail viewpoints is considered low. The Chiltern railway line runs to the north of the Site. However, due to its east-west direction of travel and location to the north, the southern elevation of the Proposed Development where solar reflections could occur if the external façade of the building was glazed or contained reflective material would not be visible to train drivers. In addition, the east and west elevations are likely to be shielded by future developments coming forward around the Site (Wembley Link and Ujima House). This, combined with the nature of the Proposed Development which does not include large areas of glazing, means that Solar Glare is not considered a key issue. Therefore, no further consideration is required for Solar Glare

236. Similarly, as the Proposed Development is residential containing purpose built student accommodation, it is not anticipated to emit levels of artificial light beyond the ILP recommendation[29]. Therefore, no further consideration is required for Light Pollution. A lighting strategy will be included within the Design and Access Statement (DAS) which will be submitted in support of the planning application.

Design Measures and Mitigation

237. Throughout the design process, feasibility studies considering the daylight and sunlight impacts to neighbours have been undertaken to help inform the massing of the Proposed Development. It is considered that the massing of the Proposed Development is in line with the Site's allocation of development and would not result in daylight and sunlight effects beyond what is anticipated for an area undergoing regeneration. Therefore, where practicable, mitigation has been embedded within the design to minimise impacts to neighbours.

Conclusion

238. The Proposed Development is not considered likely to result in significant effects in relation to daylight, sunlight, overshadowing, solar glare and light pollution. A standalone Daylight and Sunlight Report will be submitted in support of the planning application and will provide a comprehensive technical analysis.

Microclimate - Wind Microclimate

239. The consideration of the potential effects on wind microclimate as a result of the Proposed Development has been undertaken by GIA. A qualitative wind assessment and initial Computational Fluid Dynamics (CFD) assessment has been undertaken to determine if the introduction of the Proposed Development would result in adverse effects which could be considered significant both within the Site and the surrounding area.

240. Further CFD testing will be performed to assess the Lawson Comfort and Safety criteria[30]. The planning application will be accompanied by a Wind Microclimate Assessment which will present the findings of this testing including any necessary mitigation measures.

Baseline

241. Within London, prevailing winds come from the south to west quadrant, with the maximum winds from the south-west. Windy conditions can be expected in areas densely populated by tall buildings.

[29] *Institute of Lighting Professionls (ILP) ILP Guidance Note 1 for the reduction of obtrusive light (2021) GN01-21*
[30] *The Lawson comfort and safety criteria is recommended by BRE and CIBSE for wind microclimate assessments.*

242. The Site location has shelter from the west by the relatively taller UNCLE Wembley (recently completed under Planning Ref. 15/4550) and Wembley Link (Planning Ref. 18/3111). Moving around to the south-west, the Site is sheltered by the Best Western on the corner of High Road and Cecil Road, and moving to the south, the adjacent Land at Juncture of Cecil Ave & High Road scheme (19/2891), which once constructed will also provide shelter.

243. Based on the above assessment of the Site, the existing baseline conditions are expected to be consistent with an urban wind environment which taller massing within the surrounding area provides both shelter as well as impacting wind speed and direction around the Site. The Wembley Link (Planning Ref. 18/3111) indicates that winter wind conditions are typically standing with no on Site safety concerns at the locations measured.

Key Issues and Potential Effects

244. The increased building massing and height associated with the Proposed Development at the Site does have the potential to alter the local wind environment.

245. It is recognised that throughout the demolition and construction of the Proposed Development, the use of cranes and the erection of the new structure may affect the local wind microclimate. However, given the scale of the Proposed Development and therefore the scale of the equipment to be used, these effects are not anticipated to be significant. It is also noted that these demotion and construction effects will be temporary in nature and are transitory, with wind conditions progressing from the current baseline conditions towards those of the final Proposed Development which are considered to be the worst-case scenario.

246. The operation of the Proposed Development will replace the current building with building that ranges in height from 13 to 17-storeys. The Site is sheltered from the westerly winds by the developments mentioned above. The southwest corner of the Proposed Development is in line with the prevailing south-westerly wind which is expected to reduce the potential for downwash by a building of this height.

247. Initial CFD testing has been performed on the Proposed Development within its existing surrounds to assess the ground level pedestrian comfort and safety. There are no uncomfortable or safety concerns on the Site. Building entrances where there could be the potential for wind which could exceed either pedestrian comfort or safety thresholds would require mitigation in the form of recessed entrances or screens at these locations. These measures as required will be part of further CFD testing and necessary design amendments to the Proposed Development will be designed and incorporated into its design. The external roof terrace located at level 12 of the Proposed Development has potential for wind which could exceed either pedestrian comfort or safety thresholds, due to its elevated height in the surrounding area. However, this can likely to be managed with appropriate mitigation measures in place, such as balustrades of sufficient height, landscaping or targeted screens.

248. Further CFD testing is underway as part of the design of the Proposed Development, the results of this testing will identify the specific locations as described above where mitigation may be required to reduce wind speeds to below the relevant comfort criteria for these locations. These measures will then be incorporated into the design of the Proposed Development and / or landscape design as appropriate to ensure there are no wind-related safety exceedances and all conditions onsite are suitable for their intended use.

Conclusion

249. The Proposed Development is not considered likely to result in significant effects in relation to wind microclimate. Wind safety and comfort conditions both onsite and offsite are expected to remain suitable for their intended uses. CFD testing will be undertaken to further inform the detailed design, and a wind assessment will be submitted in support of the planning application.

Waste

250. The consideration of the potential effects on solid waste generation as a result of the Proposed Development has been undertaken by Trium.

Baseline

251. Where commercial and operational units on the Site remain operational and are not vacant / closed, it is assumed that the operational waste is stored in 1,100-litre Eurobins, with collections by a commercial waste contractor, which is considered to be industry standard.

252. The West London Waste Authority (WLWA) acts as the local waste authority for the LBB, Ealing, Harrow, Hillingdon, Hounslow and Richmond Upon Thames. The current West London Waste Plan[31] 2015 (also including the Old Oak and Park Royal Development Corporation) provides an assessment of existing and future waste processing capacity against estimated generation of waste within the area. Though capacity gaps are predicted based on the currently available facilities, additional waste management sites have been identified and with the implementation of the West London Waste Plan, the area would achieve net self-sufficiency by the end of the plan period. Sufficient land has been allocated for new waste management sites, and it is assumed the operation of these sites will reflect the future processing methodologies required.

Key Issues and Potential Effects

253. The demolition of the existing buildings will inevitably generate waste but works will be conducted in accordance with the controls set out within a CEMP and a SWMP which will be conditioned via an planning condition. This would ensure that waste is managed in line with relevant legislation and best practice to maximise reuse and recycling.

254. In terms of operational waste, the Proposed Development will provide sufficient space for the storage of segregated general and recyclable waste, in accordance with local policy. In addition, the servicing relating to the commercial areas and facilities management of the Proposed Development would ensure that adequate waste collection occurs, as necessary

Conclusion

255. The Proposed Development is not considered likely to result in significant effects in relation to waste.

TV and Radio Interference

256. The planning application Validation Checklist for the LBB requires a TV and Radio Assessment be submitted with the planning application. TV and radio reception has been considered within this Request for EIA Screening Opinion, despite TV and radio reception sitting outside the EIA Regulations.

257. Since the replacement of analogue TV with digital TV, there has been a reduced need to assess signal interference from introduced massing as digital TV signals are less prone to interference than analogue.

258. A review of Ofcom's mobile availability checker[32] has identified that 4G mobile services for four network providers (EE, O2, Vodaphone and Three) are available within and in close proximity to the Site. In addition to this, mobile phone reception interference is unlikely to be affected in the Site locality due to the lack of surrounding tall buildings which have the ability to interfere with mobile phone reception.

259. Due to radio signals being at lower frequencies, they can 'bend' to a greater extent around buildings (or other obstructions) when compared to TV signals. Radios are also able to make constructive use of reflected signals. As such, radio signals are able to operate successfully in dense urban settings (i.e. containing a large density of tall and large buildings) and therefore radio reception (both analogue and digital) is not considered to be at risk of degradation as a result of the Proposed Development. No likely significant effects to radio reception (both analogue and digital) are therefore anticipated as a result of the Proposed Development.

260. In addition, best practice recognises that telecommunication issues do not normally constitute environmental effects and that such issues can be dealt with by way of standard planning conditions. Considering the above, no significant environmental effects with regards to TV / radio reception.

[31] *London Borough of Brent et, al,.(2015) West London Waste Plan [online] Available: https://legacy.brent.gov.uk/media/16402581/west-london-waste-plan.pdf*
[32] *Ofcom. Mobile and Broadband Checker. Accessed online 24.02.2022 [URL: https://checker.ofcom.org.uk/mobile-coverage]*

Screening Opinion Request Conclusion

261. In the view of the Applicant and their technical consultant team, and as demonstrated within this Request for an EIA Screening Opinion, the **Proposed Development is considered unlikely to result in significant environmental effects**.

262. As can be seen from the **Consideration of Schedule 3 EIA Screening Criteria** set out in this report (above), a significant amount of environmental assessment work and reporting has been undertaken in respect of the Proposed Development to date. The results and conclusion of this work demonstrate that with an appropriate level of mitigation applied where relevant, the Proposed Development is unlikely to result in significant adverse effects on the environment.

263. In accordance with Regulation 6(6)(a) of the EIA Regulations, the LBB should adopt their screening opinion within 3 weeks beginning with the date of receipt of the request for a screening opinion.

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