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5th May 2022

Dear Sir/Madam,

**Environmental Impact Assessment Screening Opinion Town and Country Planning
(Environmental Impact Assessment) Regulations 2017**

Proposal: Request for Screening Opinion as to whether an Environmental Impact Assessment is required for a proposed development that involves the demolition of the existing buildings (two mixed use commercial buildings comprising Fairgate House and Pitman House) and 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.

Site: 390-406 High Road, Wembley

I write in connection to your screening request submitted on 14th April 2022 by Trium Environmental Consulting LLP on behalf of Regal High Road Ltd. Reference has been made to Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations') "Requests for screening opinions of the relevant planning authority".

Upon review of the material supplied in association with the screening request from the applicant, plus other material that is mentioned in association with this screening opinion, the London Borough of Brent considers that the proposed development is not EIA development. As such it will not require an EIA to be undertaken to accompany any planning application for development described that incorporates the proposed mitigation measures to address potential adverse effects of the development as set out in this screening opinion.

As required by Regulation 6(6) of the EIA Regulations please find attached the Council's Statement of Reasons which provides full reasons for this conclusion.

If you require any further assistance, please do not hesitate to contact Paul Lewin, on telephone 020 7937 6710 or email paul.lewin@brent.gov.uk.

Yours sincerely,

Paul Lewin
Team Leader Planning Policy

EIA SCREENING OPINION STATEMENT OF REASONS
The Town and Country Planning (Environmental Impact Assessment) Regulations
2017

Description of proposed development – Request for Screening Opinion as to whether an Environmental Impact Assessment is required for a proposed development that involves the demolition of the existing buildings (two mixed use commercial buildings comprising Fairgate House and Pitman House) and 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.

Site – 390-406 High Road, Wembley

Notes - The assessment of the proposed development's likely significant effects is in relation to the EIA Regulations only. The assessment does not imply any consideration of the planning merits of the proposals or indicate the likely success or otherwise of an application for planning permission.

Introduction

Trium Environmental Consulting LLP have requested a screening opinion from the London Borough of Brent (the Council) on 14th April 2022. Associated with this request details of the site boundary, proposed development and an initial assessment of the potential impacts of the proposed development were submitted to support the request.

The Existing Site and Surrounding Area

The site is located at 390 – 406 High Road, Wembley and covers an area of 0.14ha. It is occupied by two buildings Fairgate House (390 – 400 High Road, Wembley) and Pitman House (402 – 406 High Road, Wembley). 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-storeys above ground level comprising further retail and commercial land uses whilst Fairgate House comprises an additional 6 storeys above ground level containing office space. A number of the onsite premises are currently vacant and not currently in operation.

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, a cleared development site allocated for mixed use of residential and commercial 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.

The applicant has provided a desk-based review of the site and its onsite environmental considerations. The site:

- is located within an Air Quality Management Area and is approximately 50m from the 'Wembley High Road from Ealing Road to Park Lane' Air Quality Focus Area;

- 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. A High Spatial Priority Woodland Improvement Area is located to the north of the site. The Chiltern Line between the River Brent and Sudbury Hill Harrow Site of Borough Importance for Nature Conservation is located approximately 20m north of the site. No internationally protected sites are located within 7km of the site and Brent Reservoir SSSI is located 2.75km north east of the site;
- does not contain any listed buildings and is not located within a Conservation Area. The nearest listed building is St Josephs' Church (Grade II) approximately 220m southeast and Wembley High Street Conservation Area is approximately 320m north;
- is not located within a Landmark Viewing Corridor identified by the London View Management Framework (LVMF);
- is defined as being located within Flood Zone 1, indicating a 'low' probability of flooding from rivers.

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 is also available within a 1.5km walking distance. The site has a PTAL of 6a.

The site is located within site allocation reference BSWSA8 (Wembley High Road) in the Brent Local Plan 2019-2041. It is also located within the Wembley Growth Area and Wembley Opportunity Area, in addition to the Wembley town centre boundary, within a Primary Shopping Area and Secondary Shopping Frontage.

The Size and Design of the Proposed Development

The proposed development involves the demolition of the existing buildings (two mixed use commercial buildings comprising Fairgate House and Pitman House) and construction of a single building ranging in height from 13-17 storeys. The building will step up from 13, 16 and 17 storeys. The single building is to provide up to 350 new student accommodation units (Sui Generis) and ancillary facilities including a gym, study spaces and external roof terrace at 13th floor level. Up to 400sqm flexible employment and commercial space (Use Class E) is to be provided at ground floor level, with associated indoor and outdoor amenity space, bin store, plant, back of house, cycle parking, and landscaping.

Information Provided in Support of the Request for a Screening Opinion

The request for screening opinion has been submitted with a supporting statement and location plan setting out an analysis of the likely environmental effects of the proposal. Various appendices have been attached, including:

- Appendix A: Preliminary Archaeological Appraisal
- Appendix B: Archaeological Desk-Based Assessment
- Appendix C: Phase 1 Preliminary Risk Assessment
- Appendix D: Acoustic Survey Report /Environmental Noise Survey Report
- Appendix E: Townscape View Maps

This information has been utilised, as necessary, to inform this EIA Screening Opinion.

Previous History

17/1546 – Change of use of the existing retail unit (Use class A1) into a mixed used comprising retail (Use class A1) and restaurant (Use class A3) to also include the installation of an external duct to the rear elevation (Granted - 27/11/2017)

11/1638 - Proposed single storey rear extension to shop (Granted – 19/08/2011)

08/1195 - Change of use of part of ground floor from office (Use Class A2) to retail (Use Class A1) as amended by plans received 25/07/08 (Granted – 14/08/2008)

Large Scale Development within the Vicinity

Within the vicinity there are currently the following applications for significant developments which have not yet commenced/ been completed to take account of when assessing the impact of the cumulative impact of the proposed development subject of this screening opinion in association with other developments:

Wembley Masterplan

15/5550 - Permission Granted – 23/12/2016- *Hybrid planning application, accompanied by an Environmental Impact Assessment, for the redevelopment of the site including;- Full planning permission for erection of a 10-storey car park to the east of the Stadium comprising 1,816 car parking spaces of which 1,642 are for non-residential purposes, up to 82 coach parking spaces and associated infrastructure, landscaping and vehicular access.*

And

Outline application for the demolition of existing buildings on site and the provision of up to 420,000 sqm (gross external area) of new floorspace within a series of buildings comprising:

- *Retail/financial and professional services/food and drink (Use Class A1 to A4) up to 21,000 sqm;*
- *Commercial (Use Class B1) up to 82,000 sqm;*
- *Hotel (Use Class C1): up to 25,000 sqm;*
- *Residential (Use Class C3): up to 350,000 sqm (up to 4,000 homes) plus up to 20,000 sqm of floorspace for internal plant, refuse, cycle stores, residential lobbies, circulation and other residential ancillary space;*
- *Education, healthcare and community facilities (Use Class D1): up to 15,000 sqm;*
- *Assembly and leisure (Use Class D2): 23,000 sqm;*
- *Student accommodation (Sui Generis): Up to 90,000 sqm.*

And associated open space (including a new public park) and landscaping; car and coach parking (including up to 55,000 sqm of residential parking and 80,000 sqm non-residential parking) and cycle storage; pedestrian, cycle and vehicular accesses; associated highway works; and associated infrastructure including water attenuation tanks, an energy centre and the diversion of any utilities and services to accommodate the development.

A number of elements of the outline application are complete and operational whilst others are yet to begin construction. The following Reserved Matters have been approved in relation to the Outline application above, and are either under construction or have not yet started:

NW09/10 – 18/4422 - Reserved Matters –Granted 19/02/2019 - Started

NE02 – 21/2517 - Reserved Matters – Granted 22/10/2021 – Not Started
NE03 – 21/2424 – Reserved Matters – Granted 22/10/2021 – Started

Land Surrounding Wembley Stadium Station, South Way, Wembley

14/4931 – Granted – 23/12/2016

A hybrid planning application, for the redevelopment of the site to provide seven mixed use buildings up to 19 storeys in height accommodating:

- *outline planning permission for up to a total of 75,000sqm to 85,000sqm mixed floor space including*
- *up to 67,000sqm of C3 residential accommodation (approximately 725 units);*
- *8,000sqm to 14,000sqm for additional C3 residential accommodation,*
- *C1 hotel and/or sui generis student accommodation (an additional approximate 125 residential units;*
- *or 200-250 bed hotel; or approximate 500 student units; or approximate 35 residential units and 200 bed hotel);*
- *1,500sqm to 3,000sqm for Classes B1/A1/A2/A3/A4/D1/D2;*
- *together with associated open space and landscaping; car parking, cycle storage, pedestrian, cycle and vehicle access; associated highway works; improvements to rear access to Neeld Parade; and associated infrastructure*
- *full planning permission for a basement beneath Plots SW03 - SW05 to accommodate 158 car parking spaces and 9 motor cycle spaces; Building 3A within Plot SW03 to accommodate 188 residential units and 150 cycle spaces; and associated infrastructure, landscaping, open space, vehicular access and servicing*
and subject to a Deed of Agreement dated 23 December 2016 under Section 106 of the Town and Country Planning Act 1990, as amended

Some of the buildings are complete and operational, others are still under construction. The following Reserved Matters has been approved in relation to the Outline application above and is Under Construction:

SW01, SW02, SW07 – 18/0742 - Reserved Matters –Granted 06/07/2018 - Started

Fulton Quarter - Stadium Retail Park + Fountain Studios - 128 Wembley Park Drive Olympic Way

17/3059 – Granted – 01/02/2021 – Not Started

Outline planning permission for demolition of existing buildings on site and provision of up to 85,000 sqm (Gross External Area, GEA) of new land use floorspace (across 1.679 ha) within a series of buildings, with the maximum quantum as follows:

- *A1-A4 Retail and/or B1 Office and/or D1 (Non-Residential Institutions) and/or D2 Leisure and Assembly: up to 6,600 sqm; and*
- *C3 Residential: up to 78,400 sqm gross (approximately 995 units);*

No occupied residential accommodation will be at ground level or below.

The development will also provide associated open space and landscaping; car parking spaces and cycle storage; pedestrian, cycle and vehicle access; associated highway works; and associated infrastructure including water attenuation tanks, and the diversion of any utilities and services to accommodate the development. Internal plant, refuse, cycle stores, residential lobbies, circulation and other ancillary space will comprise a maximum of 10,000 sqm gross external in addition to the 85,000 sqm total set out above.

Subject to a Deed of Agreement dated 27 January 2021 under Section 106 of Town and Country Planning Act 1990, as amended.

Red House building, South Way, Land and Pedestrian walkway between South Way and Royal Route, Wembley Park Boulevard, Wembley

15/3599 – Granted – 27/07/2016 – Started

A hybrid planning application for the redevelopment of the site including;-

- *Full planning permission for the demolition of existing building and erection of a 13-storey building comprising a 312-bed hotel (Use Class C1) with ancillary and/or ground uses including a restaurant, bar, offices and gym (Use Classes A1-A4/B1 and/or D2) (referred to as Plot W11), on-site cycle parking and*
- *Outline planning permission for the demolition of existing building (The Red House, South Way) and erection of a 4-storey building comprising 1610sqm of and/or A1-A4/B1/D1 and D2 uses, with all matters reserved (referred to as Plot W12) and new pedestrian boulevard (outline).*

with associated service yard, landscaping and infrastructure works (as amended).

Land at Juncture of Cecil Ave & High Road, HA9

19/2891 – Granted 05/02/2021 – Not Started

Full planning application for the construction of a mixed use building comprising new homes (Use Class C3), flexible workspace and community space, landscaped courtyards and playspace, wheelchair and cycle parking, signage and wayfinding and associated plant and infrastructure

Wembley Link, Land, garages, alleyway rear of 416-444, High Road, Wembley, HA9

18/3111 – Granted 06/04/2020 - Started

*Erection of 2 residential blocks (17 and 19 storeys) connected at ground floor level comprising self-contained apartments, lower ground floor, flexible workspace (Use Class B1) on upper ground floor and roof top amenity, provision for car and cycle parking, refuse and associated communal spaces and hard and soft landscaping, subject to Deed of Agreement dated 01 April 2020 under Section 106 of the Town and Country Planning Act 1990. **This application is accompanied by an Environmental Statement***

1-7, 9, 11 & 11A Elm Road, Wembley, HA9 7JA

18/1592 – Granted 17/10/2018 - Started

Demolition of existing hotel buildings and erection of a part 3, part 4 and part 5 storey 226 bed aparthotel plus basement accommodation comprising guestrooms and ancillary facilities within a 5-storey basement (situated below the part-basement lower ground floor), together with soft and hard landscaping, servicing, cycle storage and refuse and recycling facilities, subject to a Deed of Agreement dated 15 October 2018 under Section 106 of the Town and Country Planning Act 1990, as amended.

Ujima House, 388 High Road, Wembley, HA9 6AR

19/3092 – Granted 05/02/2021 – Not Started

Demolition of the existing building and erection of a new building comprising residential floorspace (Use Class C3), flexible workspace with ancillary cafe, associated hard and soft landscaping, wheelchair car parking and cycle parking.

Other Environmental Assessments

Regulation 5(5)(b) of the EIA Regulations requires the relevant planning authority to take into account the results of any relevant EU environmental assessments.

Development Plan

The Brent Local Plan (2019 – 2041) was adopted at Full Council on the 24th February 2022 and is the key strategic document to guide and manage development in the borough. The development plan also comprises the West London Waste Plan (2015) and the London Plan (2021). Together these documents provide spatial policies, development management policies and site allocations to guide and manage development in the borough.

An Integrated Impact Assessment (IIA) accompanies the Local Plan, which incorporates the SA and SEA – that consider the potential for significant economic, social and environmental effects. This document has been considered when generating the EIA Screening Opinion. The SAs satisfied the requirements of the EC Directive 2001/42/EC and Strategic Environmental Assessment (SEA) Regulations on the assessment of the effects of certain plans and programmes on the environment.

These documents have been referred to when generating the EIA Screening Opinion.

Legislation

The proposed development does not fall within any of the descriptions of development listed in Schedule 1 of the EIA Regulations, and is therefore not a 'Schedule 1 development'. The development does, however, fall within the description of a Schedule 2 development, classified under item 10 (b) as 'urban development projects'.

'Schedule 2 development' means development (other than exempt development – which this is not) of a description mentioned in Column 1 of the table in Schedule 2 where:

- a) any part of that development is to be carried out in a sensitive area; or
- b) any applicable threshold or criterion in the corresponding part of Column 2 of that table is respectively exceeded or met in relation to that development.

No part of the proposed development is to be carried out in a 'sensitive area' as defined by the EIA Regulations.

The threshold for item 10(b) is as follows:

- (i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or
- (ii) the development includes more than 150 dwellings; or
- (iii) the overall area of the development exceeds 5 hectares.

The proposed development consists of 350 student accommodation units (bedrooms). When using the national housing delivery test methodology for dwelling completions monitoring (2.5 bedrooms to 1 dwelling), this equates to 140 dwellings; below the 150 dwellings threshold. This proposal therefore falls below the indicative criteria and screening thresholds, nevertheless, on a precautionary basis given the potential for different interpretation of the definition of student accommodation as dwelling numbers the Council will provide a screening opinion.

Consideration will therefore be given to whether the proposed development may give rise to significant environmental effects, such that an EIA may be required.

Likely Significant Effects

The ultimate stage in the screening process is to consider whether it is '*likely to have significant effects on the environment by virtue of factors such as nature, size or location*'. As required by regulation 5(4)(c), where a relevant planning authority has to decide whether Schedule 2 development is EIA development, they must take into account the selection criteria set out in Schedule 3 as are relevant to the development.

The Council has taken into account the selection criteria set out in Schedule 3, where relevant to the proposed development. This includes the characteristics of the development, the environmental sensitivity of geographical areas likely to be affected, and the likely significant effects in relation to these criteria, with regard to the factors specified in regulation 4(2) and taking into account the types and characteristics of the potential impact listed in paragraph 3.

In addition, as required by regulation 5(5)(a), where the relevant planning authority adopts an EIA Screening Opinion they must state the main reasons for their conclusion with reference to the relevant criteria listed in Schedule 3. Within this Statement of Reasons, the Council has stated the main reasons for their conclusion, referencing the relevant criteria listed in Schedule 3 as appropriate.

The Council has concluded that the proposed development does not require an EIA to be undertaken to accompany a planning application for the proposed development as the proposed development is not likely to generate significant environmental effects – Appendix A (below) sets out the reasoning for this decision.

Appendix A – Consideration of Likely Significant Effects

Air Quality

The site is located within the Brent Air Quality Management Area (AQMA). The majority of Brent has been designated as an AQMA, and therefore even small increases in emissions can lead to adverse effects. The AQMA has been declared for exceedance of the annual mean national objective for nitrogen dioxide (NO₂) and the 24 hour mean national objective for particulate matter (PM₁₀). The site is also approximately 50m from the 'Wembley High Road from Ealing Road to Park Lane' air quality focus area identified by the GLA.

There are a number of sensitive receptors in close proximity to the proposed development site, including the residential properties, businesses and a hotel.

Documentation Accompanying the Planning Application: *an Air Quality Assessment (including Air Quality Positive Assessment) will be submitted with a future planning application.*

Construction

Machinery used during construction can generate new sources of emissions, as well as traffic movements to/from the site and the works themselves. When assessing the effect of dust emissions generated during construction works, receptors are defined as the nearest potentially sensitive receptor to the boundary of the site in each direction. These receptors have the potential to experience effects of greater magnitude due to emissions of particulate matter generated by the works, when compared with more distant receptors.

The receptors in close proximity to the site, combined with the new emissions, means that there is the potential for adverse effects as a result of the construction of proposed development.

Whilst there is the potential for adverse effects, with the implementation of standard best practice measures, it is not anticipated that the effects would be significant. Taking account of these practices the effect of dust soiling and PM₁₀ is likely to be reduced to negligible with the implementation of appropriate mitigation measures. These may include: no idling vehicles; erect solid screens or barriers around dusty activities or the site's boundary; loads entering and exiting the site are covered; where practicable use mains or battery powered generators over fuel burning; other dust suppression measures e.g. damping down with water; and all constructions vehicles and equipment to comply with relevant EU stage ratings. These standard mitigation measures can be implemented through a construction environmental management plan (CEMP), which can be secured through a standard planning condition.

As such, whilst there is the potential for adverse effects as a result of the proposed construction, with the implementation of standard mitigation measures, it is not anticipated that the effects would be significant.

Operation

Air quality emissions during operation will be from new traffic generation, heating systems and potentially operation of the businesses related to the commercial floorspace proposed. Consideration also needs to be given to the potential effects on the new internal receptors given the location for the proposed development adjacent to a relatively heavy trafficked road.

The proposed development will be a 'car-free' scheme and the majority of associated vehicular movements will be attributed to servicing and deliveries with a small number of movements associated with the proposed student accommodation. A Controlled Parking Zone is in place in the surrounding area which will deal with potential displacement off-site. This, along with measures to support walking, cycling and public transport is likely to reduce private car use. Taking this into account the level of net traffic generation resulting from this development is likely to be negligible. As such emissions from vehicle movements will be minimal, and therefore effects are not considered to be significant.

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. The supporting information notes that ASHP systems do not have any emissions associated with them. However, the emergency diesel generator could impact on local air quality conditions. According to the supporting information, the location, height and setting of the generator flue will ensure there are no significant impacts upon local air quality.

Given the proximity of commercial to residential it is assumed that occupiers are unlikely to undertake activities that will generate potentially significant impacts on air quality. Such uses would be subject to environmental health legislation.

Consideration also needs to be given to the potential effects on the new internal receptors given the location for the proposed development adjacent in part to a relatively heavily trafficked road, and the site being within an AQMA. The Screening Requests states that the design of the development will ensure the users are not exposed to unacceptable air quality.

Mitigation

As the site is within a growth area in the Local Plan requires development to be air quality positive. During the construction phase a CEMP should be implemented which implements suitable measures to reduce the impact of dust and emissions. This can be secured via a planning conditions.

The developer should consider the potential impact of air quality and dust on occupational exposure standards (to minimise worker exposure) and breaches of air quality objectives that may occur outside the site boundary. Continuous visual assessment of the site should be undertaken and a complaints log maintained in order determine the origin of a particular dust nuisance.

For the operational phase suitable mitigation is to be secured through a planning condition to ensure that new internal receptors are adequately protected.

In addition, suitable conditions associated with the Travel Assessment including Travel Plan and measures to reduce reliance on the private car, for example through provision of sufficient cycle parking will ensure reductions in impact through vehicle movements.

Local Heritage

Documentation Accompanying the Planning Application: *A Heritage and Townscape Visual Impact Assessment will be submitted with any future planning application.*

The site is not within a conservation area, although a Site of Archaeological Interest is located approximately 25m west (on the Wembley Link site). The closest heritage asset is approximately 250m away, although there are several heritage assets within 1km of the site. The following are within proximity of the site:

- * Wembley Arena (Grade II Building)
- Roman Catholic Church of St. Joseph (Grade II Building – approximately 250m away)
- No. 324 Harrow Road (Locally listed Building)
- Wembley High Street Conservation Area
- King Edward VII Park (Locally listed Park)

The site can be considered to have a generally low archaeological potential for all past periods of human activity. It is possible that archaeological remains may survive in the less disturbed areas of the site around the site boundary in the north-west part of the site, but such deposits are likely to have been disturbed by the insertion of the modern services which are likely to be present within this part of the site. On the basis of the available information no further archaeological mitigation measures are recommended in this particular instance.

The impact of the scale and height of the proposed buildings through the design and access statement and HTVIA will allow sufficient clarity of impact on the setting of features of historic or cultural importance. The separation distance between the site and designated heritage assets means that significant impacts are not anticipated.

The Council considers that given the scale of the development and the urban nature of its location the proposed development would not lead to significant adverse environmental effects on heritage assets, as such EIA is not required in respect of heritage and cultural impacts.

Climatic Factors

Documentation Accompanying the Planning Application: *An Energy Statement, Sustainability Statement, Whole Carbon Lifecycle Assessment, Urban Greening Plan and Circular Economy Statement will be submitted as part of the planning application process.*

Construction

Emissions from construction traffic and plant can contribute towards the region's greenhouse gas emissions. Due to the size of the proposed development the emissions are not considered to be substantial, and therefore no significant effects are anticipated. It is advised that sustainable methods of working should be implemented to reduce any emissions, and should be implemented as part of the CEMP.

Operation

Supporting information states that 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. The proposed development shall also 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.

It is considered that the proposed development will be able to achieve the necessary carbon reduction targets, through actual reductions combined with financial contributions. The effects of which are beneficial, but are not considered to be significant.

Mitigation

A CEMP should be secured that includes measures to reduce emissions e.g. management of plant to prevent plant running when not in use.

The s106 will need to be worded to ensure that any required carbon reduction off-set payments are secured.

Taking account of the above the Council does not consider that the environmental impacts related to climate change are significant enough to warrant EIA.

Contaminated Land

Documentation Accompanying the Planning Application: A Contamination Assessment will be submitted with a future planning application. The Screening Request has been accompanied by a Phase 1 Preliminary Risk Assessment.

The site is located within a historic industrial site, and used to comprise a depot and garage. This was then re-developed to the site's current commercial configuration. Previous activities associated with the depot and garage may have resulted in soil contamination. As such there is the potential for sources of contamination related to its previous uses.

Construction

During construction there is considered to be a low likelihood of fuel leakages/ spills from construction vehicles. A CEMP would be implemented to manage potential effects. In addition, there is the risk of exposure to contaminated materials and opening up pathways to underlying substrata. Standard mitigation measures will be required during the construction of the proposed development, to ensure that the works are undertaken in an appropriate manner. These should be secured through conditions in agreement with the Council's Contaminated Land Officer.

Supporting information notes that 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.

With the implementation of these mitigation measures, no significant effects are considered likely.

Operation

Supporting information notes that 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.

With the implementation of any required impact avoidance measures as part of the construction phase, no significant effects are anticipated at operation.

Mitigation

A ground investigation works will be undertaken to confirm the ground and groundwater conditions beneath the Site. 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.

Standard construction mitigation measures should be secured through the CEMP and through conditions in agreement with the Council's Contaminated Land Officer.

Taking into account the above the contamination issues are not so significant as to warrant and EIA.

Daylight, Sunlight and Overshadowing

There are a number of sensitive receptors in close proximity to the proposed development site, including residential properties, businesses, and a hotel.

Documentation Accompanying the Planning Application: *A Daylight and Sunlight Assessment (including overshadowing and solar glare) will be submitted with a future planning application.*

Construction

During construction, there will be a change in the provision of daylight/sunlight due to the construction equipment (i.e. cranes) and the erection of the new building.

The construction equipment will be temporary and short-term, and therefore impacts are not considered to be significant.

The erection of the new building will generate some adverse effects as it is built out. The construction effects will however be no greater than the completed, operational development, which are not considered to be significant.

Operation

The operation of the proposed development will introduce buildings up to 17 storeys onto the site. Due to the proximity of nearby sensitive receptors and the height there is the potential for the proposed development to affect surrounding receptors. Some properties may be adversely affected by the proposed development, and supporting information notes that there is potential for amenity space associated with the consented Wembley Link scheme to be overshadowed by the proposed development. This will be considered in the standalone Daylight and Sunlight Report. In addition, daylight and sunlight impacts to future residential receptors are anticipated (in particular Ujima House) and this will also be considered in the Daylight and Sunlight Report. Given the number of receptors and the site's urban location, the effects are not considered to be significant.

With respect to onsite receptors the building will sit within a context where tall buildings are prevalent in close proximity which could impact on sunlight and daylight available to the development. Whilst this might impact on some receptors significant effects are not considered to be likely.

Mitigation

No discipline specific mitigation has been relied upon for the EIA Screening Opinion.

The supporting information notes that feasibility studies have been undertaken throughout the design process to help inform the massing of the proposed development and that where practicable, mitigation has been embedded within the design to minimise impacts on neighbours.

Taking account of the above it is considered that the environmental impacts in relation to daylight, sunlight and overshadowing would not be so significant to warrant EIA.

Biodiversity (including flora and fauna)

Documentation Accompanying the Planning Application: An Ecological Impact Assessment (including relevant protected species surveys and reports), Urban Greening Plan (included in the D&AS) and Tree Survey and Arboriculture Impact Assessment will be submitted with a future planning application. An updated Preliminary Ecological Appraisal alongside a Bat Emergence/Return Roost Survey Report will be submitted to inform the planning application.

The site contains no areas of statutory nature conservation and there are no such site within the immediate vicinity of the site. There are no SPA, SAC or Ramsar designations within 5km of the Site. The nearest nationally protected site is Brent Reservoir SSSI, 2.8km from the site. There are no LNRs within 1km of the site. The Chiltern Line between River Brent and Sudbury Hill Harrow SINC (Grade 1) and a wildlife corridor are located approximately 20m north of the site.

There are no environmental pathways such as water courses through which the proposal could adversely affect these protected areas. It is not considered that the proposed development will have a significant effect on the integrity of statutory or non-statutory nature conservation designations or protected species and the potential for conservation requirements and objectives would not be diminished.

A Preliminary Ecological Appraisal (PEA) has been appended to the Screening Request. The Screening Request supporting information states that the site is deemed to have low ecological value and is of negligible value to local wildlife. The PEA notes that an assessment of the current site found to contain some features considered to be suitable for roosting bats, foraging and commuting. Surveying has been recommended and the PEA will be updated following these surveys to be resubmitted with a future planning application. Habitats onsite are considered suitable for other species such as reptiles and invertebrates, but these are considered unlikely to be present within the site. There is potential for breeding birds to be onsite.

Construction

The supporting information notes that during demolition and construction there is potential for destruction of active wild birds' nests and bat roosts. A range of standard mitigation measures may be required to reduce potential adverse impacts on biodiversity, such as timing of demolition/ construction activities, relocation of bats and controls on lighting.

It is considered that following the implementation of reasonable design and mitigation measures there will not be any significant adverse impacts to species present on the site (considered in more detail in the 'mitigation' section below).

Operation

During operation, there is potential for disturbance to wildlife, particularly foraging bats, in the habitat to the north of the site due to altered lighting within the site. However, the supporting information notes that sensitive lighting could be implemented to avoid disturbing bats.

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. There is the potential for the proposed development to beneficially contribute to biodiversity of the local area through the implementation of ecological enhancement measures. Whilst this is considered to be beneficial, this is not considered to be significant.

Mitigation

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.

Suitable conditions should be in place to any potential planning permission to ensure potential adverse impacts on any existing protected species are minimised prior to and during works on site, as well as incorporation of suitable features to encourage bio-diversity resources as part of the development.

Taking account of the above no significant environmental effects should arise which would require the need for an EIA.

Flood Risk

Documentation Accompanying the Planning Application: *A Flood Risk Assessment will accompany a future planning application, in addition to a Drainage Strategy (including Foul Sewage Assessment).*

The site is located within Flood Zone 1 (fluvial) and as such has a low likelihood of flooding by river or sea. The site is also at low risk of surface water flooding. Additionally, the site is not susceptible to groundwater flooding or potential elevated groundwater.

Construction

Given that the site is located within Flood Zone 1 (for both fluvial and pluvial flooding) in the construction process there is considered to be limited risk to property and people.

Operation

The proposed development site is located in an area at low risk of flooding. Supporting information states that the footprint of the proposed development covers the majority of the site. That said, given the scale of the development and its location within flood zone 1, the operation of the proposed development is not considered to significantly affect flood risk.

The surface water runoff design will need to be undertaken in accordance with the requirements of the London Plan utilising sustainable drainage systems (SuDS). Surface water outfall will, consistent with the Local Plan, need to be at greenfield run off rates utilising appropriate sustainable drainage systems (SuDS), reducing the potential for flood risk off site. Supporting information notes that 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.

Mitigation

As part of the site enabling, demolition and construction activities the contractor will be required to produce an appropriate project specific CEMP, which will include appropriate measures to manage any discharge of water from the site.

Implementation and management of surface water run-off should be secured through a planning condition.

Taking account of these matters it is considered that the development will not have significant effects that warrant the need for EIA.

Human Health

It is considered that human health (both of existing and new receptors) has been appropriately considered within the relevant topic sections (e.g. water / land contamination, air pollution, acoustic issues) and as such, reference should be made to these sections as required.

Land (land take)

The construction and operation of the proposed development will utilise brownfield land to provide student accommodation and commercial floorspace. This is not considered to generate any significant effects. No discipline specific mitigation has been relied upon for the EIA Screening Opinion.

Material Assets

The construction and operation of the proposed development will utilise material assets, but given the scale of the development this is not considered to be substantial. As such, significant effects are not considered to be likely. No discipline specific mitigation has been relied upon for the EIA Screening Opinion.

Major accidents and/or disasters

The site is not located in the vicinity of any Control of Major Accident Hazard (COMAH) sites. It is considered that the risk from major accidents and/or disasters (both of existing and new receptors) has been appropriately considered within the relevant topic sections (e.g. climate change, flood risk) and as such reference should be made to these sections as required.

Noise and Vibration

Documentation Accompanying the Planning Application: *. A Noise & Vibration Impact Assessment will accompany the planning application.*

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.

There are sensitive receptors in close proximity to the site and the proposal will introduce student accommodation and employment generating uses, that in themselves will be considered as sensitive receptors.

Construction

Machinery used during demolition/construction on site can generate new sources of noise, as well as construction traffic movements in the vicinity. The nearby receptors combined with the new noise emissions, means that there is the potential for adverse effects as a result of construction activities.

Given the scale of the development, standard impact avoidance measures can be implemented to reduce emissions from construction activities, which will be secured through the CEMP. In the context of traffic movements around the site, the level of construction vehicle movements will not be exceptional. No significant effects are therefore anticipated.

Operation

Supporting information notes that 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. As such, there is not considered to be any significant effects from traffic noise.

The proposed residential use is not considered to be inherently noisy. There is potential for noise from the proposed commercial unit, but this can be considered as part of the detailed design stage. There are likely to be deliveries to residents and commercial properties as well as waste removal, but in an urban context the impacts will be limited.

Some noise may be generated from the operation of the building services plant equipment, but plant noise emissions will be required to meet local policy requirements and British Standards. Adherence to these values will ensure that new and existing receptors are not adversely affected, and will ensure that there will be no significant effects.

There is the potential for new residents to be affected by adverse noise due to the site's location. The Noise Assessment will consider how new residents can be protected through the appropriate design of the proposed development. The proposed development can therefore be designed with consideration to the location of the development and the potential noise implications – secured through planning conditions. In terms of vibration, supporting information notes that an environmental vibration survey has been carried out, which has determined that both tactile vibration and ground-borne re-radiated noise are below their respective assessment criteria and are therefore not considered to be an issue for the proposal.

No significant effects are therefore anticipated.

Mitigation

Adherence to the CEMP should be secured through a planning condition, the CEMP will include standard mitigation measures to reduce noise emissions. Plant noise should be controlled to local and national guidelines using a planning condition.

Suitable mitigation will be required to be included within the design of the proposed development to ensure that new internal receptors are adequately protected. This might be through specifications on glazing, acoustic trickle vents, air bricks or mechanical ventilators, in order to reduce noise ingress but provide adequate ventilation to the standards.

Taking account of these matters it is considered that the development will not have significant effects that warrant the need for EIA.

Socio-Economic (including population)

Documentation Accompanying the Planning Application: *The planning statement might give an indication of current land use and number of jobs within the site and compare this with what is proposed.*

Construction

The proposed development would create benefits to local employment though providing temporary employment during construction. This is considered to be beneficial, but not significant.

Operation

Supporting information notes that the proposed development would provide student accommodation housing, which would result in some increased spending in the local area. Whilst this would have a positive effect, it is unlikely to be significant in terms of the local economy.

The proposed development would create benefits to local employment though providing permanent employment once operational. Although the existing site contains commercial floorspace at ground floor, the majority of these are currently vacant. It is not clear how many jobs could be generated by the proposed development compared to the existing site, however regardless of a small increase or small decrease in total commercial floorspace, effects on operational employment opportunities are not anticipated to be significant.

The development will increase demand for local social infrastructure. Supporting information notes that the GP surgeries in the area show some capacity. Community Infrastructure Levy (CIL) payments will be sought to offset the effects of the development. These financial contributions will mitigate adverse effects, so that significant effects are unlikely.

Mitigation

Financial contributions through CIL will be sought to mitigate the effects of increased population/ users.

Taking account of these matters it is considered that the development will not have significant effects that warrant the need for EIA.

Soil (organic matter, erosion, compaction, sealing)

Construction

There is the potential for some loss of organic matter, erosion, compaction and sealing during the demolition/construction phase; however, given the scale of the development and the length of the demolition/construction phase, effects are not considered to be significant.

Operation

The operation of the completed development is not anticipated to affect organic matter, erosion, compaction and sealing. As such, significant effects are not considered to be likely.

Mitigation

The implementation of a CEMP during the construction phase will ensure that standard mitigation measures are implemented.

Telecommunications

Supporting information states that 4G services are available within and in close proximity to the site. Radio reception is not considered to be at risk of degradation as a result of the proposed development as radio signals can successfully operate in dense urban settings. Additionally, supporting information notes that since the introduction of Digital TV, there is a reduced need to assess signal interference as digital TV signals are less prone to interference than analogue.

It is considered that there is no known significant likelihood at this stage, of detrimental effects from or on telecommunications that would warrant the submission of an EIA.

Townscape and Visual Impact

Documentation Accompanying the Planning Application: *A Heritage and Townscape Visual Impact Assessment will be submitted with the planning application*

Construction

The construction works are likely to require large cranes/ equipment, and therefore there is the potential for adverse effects on views and townscape. That said, given the relatively short term, temporary nature of the construction works and the scale of the development, effects are not considered likely to be significant. Supplementary mitigation can be implemented through the use of hoarding, to provide a physical/visual barrier to the works.

Operation

The height of the proposed development will be up to 17 storeys, and therefore a greater scale than that previously on site. The context within which it sits however currently includes tall buildings in the near vicinity. The recently completed UNCLE Wembley development is located approximately 150m west and is 26 storeys. A number of taller buildings are also set around Wembley Stadium as part of the Wembley Masterplan, located approximately 400m from the site at its closest point. Wembley Link (18/3111), which is under construction to the north west of the proposal, reaches a height of 19 storeys. An Environmental Statement was submitted with this application, which included a townscape and visual analysis. The analysis determined that the height, bulk and mass of the buildings at Wembley Link was considered to be acceptable.

As such, the Council considers that although there is the potential for the proposed development to lead to some adverse effects on townscape and views, given the scale of the development and the urban nature of its location, significant effects are not considered likely.

Mitigation

During construction, ensure the erection and maintenance of hoarding. Design, height and massing to reduce potential for adverse impact.

Taking account of these matters it is considered that the development will not have significant environmental effects that warrant the need for EIA.

Traffic and Transport

Documentation Accompanying the Planning Application: *A Transport Assessment (including Draft Delivery and Servicing Plan), Framework Travel Plan and Construction Logistics Plan will be submitted with the planning application. A Construction Traffic Management Plan is likely to be secured through a planning condition.*

The site has a PTAL of 6a and therefore benefits from excellent transport connections. 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. Bus stops are located on the High Road on either side of the site.

Construction

There will be an increase in the number of vehicles accessing the site during the construction phase, however, given the scale of the development the anticipated numbers are not considered to be substantial. It is considered that any adverse effects can be mitigated through a Demolition and Construction Logistics Plan (DCLP) to control transport movements.

With the implementation of standard mitigation measures, no significant effects are anticipated.

Operation

The proposal is for student accommodation with ground floor flexible employment and commercial uses, and does not include any car parking spaces. The proposal is therefore likely to generate minimal vehicular traffic, predominantly linked to delivery and servicing vehicles.

An initial multi-modal trip generation assessment discussed in the supporting information found that a total of 42 two-way vehicle movements could be generated by the development. This does not take into account the existing vehicle trips already associated with the site that will be removed.

Given the scale of the development, these effects are not considered to be significant. The lack of on-site car parking and residents' controlled parking zone in the area will mean that suitable controls on residents potential to own/ park cars on site and in the vicinity will be

expected, this is likely to include restrictions within property leases as well as financial payments towards a local parking permit scheme, which will help to mitigate any adverse effects. There is likely to be additional use of the underground station and local bus services, which might need some capacity improvements.

The Transport Assessment will fully assess the transport impacts of the scheme and will identify mitigation measures as appropriate. It should set out how the site would be serviced when operational, which is consistent with an approach agreed with the local highway authority. A Framework Travel Plan and Delivery and Service Plan will also be produced to support a planning application.

Mitigation

A DCLP should be secured that includes standard mitigation measures to control transport movements.

Suitable conditions associated with the Travel Plan, the Framework Delivery Plan and Delivery and Servicing Plan will ensure reductions in impacts through vehicle movements. Controls on occupants and financial payments should be sought to offset operational effects.

As such no significant environment effects are anticipated to require EIA.

Waste

Documentation Accompanying the Planning Application: *A CEMP will be sought as part of the planning process to deal with demolition and construction waste matters.*

A Construction Logistics Plan will be submitted with a future planning application. A Site Waste Management Plan (SWMP) is likely to be secured through a planning condition.

A Waste Management Strategy or similar type of analysis within the planning statement of how the development will adequately cater for the storage and collection of domestic and commercial waste during its operation will be sought.

A Circular Economy Statement is also required for all developments referable to the Mayor.

Construction

The site will generate waste, principally building materials during the demolition and construction stages. The management of construction waste is covered by the Waste Duty of Care Legislation (2016), issued under section 34 of the Environmental Protection Act 1990. The implementation of standard impact avoidance measures will reduce waste from construction activities, which can be secured through the CEMP. Furthermore, the Circular Economy Statement will set out how materials arising from demolition will be re-used and/or recycled. No significant effects are therefore anticipated.

Operation

Sufficient waste storage facilities would be designed into the Proposed Development, in line with the LBB requirements and the waste hierarchy.

The inclusion of suitable waste facilities for residents is covered under part H6 of the Building Regulations, and to ensure this, inclusion of separate facilities for general waste, recycling and organic materials is normally assessed for capacity and suitability as part of

the normal planning process with reference to the 2015 Brent Council guidance. Commercial waste is covered under the same legislation as construction waste, above.

The decision notice should include suitable conditions to ensure that waste facilities for residents and businesses are provided prior to occupation. No significant effects are anticipated.

Mitigation

Adherence to the CEMP which will include standard mitigation measures should be secured through a planning condition for construction phase, as well as one that seeks to ensure sufficient space and practises to ensure adequate measures for waste management are in place prior to and during occupation.

Water Quality (hydromorphological changes, quantity and quality)

Documentation Accompanying the Planning Application: A Drainage Strategy (including a Foul Sewage Assessment) will be submitted as part of the planning application process. A Generic Quantitative Risk Assessment (GQRA) will be undertaken as part of intrusive ground investigation works and will be summarised within a report which will accompany the planning application. This matter may also be addressed in the Contamination Assessment and the CEMP that will be required as part of the application/ permission process.

The site has historic industrial use with potential for various compounds that could adversely affect water quality such as hydrocarbons within the ground if disturbed. The site however, is not located within or close to a groundwater Source Protection Zone.

Construction

During the construction process there is the potential to affect water quality through accidental pollution events, such as fuel spills and increased sediment within surface water passing through to adjacent watercourses. The implementation of standard impact avoidance measures should be secured through the CEMP. In addition the potential of contamination on site could result in pathways either above or below ground being created that lead to watercourses, for example through piled foundations. This will require measures to avoid such potential. With the implementation of standard impact avoidance measures to ensure that the site is adequately protected, no significant effects are anticipated. It is not considered, given the scale of the development and works proposed that there will be any significant effects on either water quantity or hydromorphology during construction.

Operation

There is the potential for the operation of the proposed development to affect the foul and surface water capacity/ quantity due to an increased demand. Whilst there may be an increase in demand, given the scale of the development, it is not considered to lead to significant effects.

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. It is not considered, given the scale of the development and the implementation of SuDS (refer to Floor Risk section above), that there will be any significant effects on either water quality or hydromorphology once operational.

Mitigation

A CEMP should be secured that includes measures to protect against and deal with accidental pollution events. The GQRA will identify if and where contamination is present and measures required to ensure that any construction activity does not increase risk to water quality will be secured through planning condition. The implementation and management of SuDS and associated pollution control mechanisms for surface drainage should be secured through a planning condition.

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.

As such it is not anticipated that the environmental effects will be of such significance to warrant EIA.

Wind

Documentation Accompanying the Planning Application: *A Wind Report (CFD) will accompany the planning application.*

Construction

It is recognised that throughout the demolition and construction phase of the project, the cranes and the erection of the new structure may affect the local wind microclimate, however these effects are considered to be temporary and not anticipated to be significant.

Operation

The operation of the proposed development will introduce new buildings onto the site that will be up to 17 storeys in height. On its own, or in combination with existing or proposed adjacent tall buildings therefore there may be adverse effects on the existing wind conditions. However, supporting information suggests that the site is sheltered from westerly winds by other developments, and the southwest corner of the proposal is in line with the prevailing south-westerly wind which is expected to reduce the potential for downwash by a building of this height.

Impacts can be assessed throughout the normal planning process taking account of the Wind Report. Mitigation measures should be incorporated into the development to reduce the impacts on those within and adjacent to the development to acceptable levels.

As such it is not anticipated that the environmental effects will be of such significance to warrant EIA.

Cumulative Effects

The 2017 EIA Regulations requires the consideration of cumulative effects through interactions being the combined effects of individual effects arising as a result of the development and also with other existing development and/or approved development.

Supporting information states that cumulative effects in relation to construction, wind microclimate, townscape and traffic are those topics where cumulative effects are considered most likely.

There are a number of major developments in the surrounding area that are likely to be built, as detailed in 'Large Scale Development within the Vicinity'. The proposal in association with these wider developments may have the potential for cumulative impacts. The impacts of this needs to be considered when determining if the effects would be so significant as to warrant EIA.

The Council has considered a wide area, consisting of other development sites adjacent or within 1km of the proposed site. Three of the applications identified (15/5550; 14/4931; 18/3111) as part of the cumulative assessment were subject to Environmental Impact Assessments. The Council has considered the information contained within this assessment related to the individual impacts and also the associated cumulative impacts of the proposals. It considers that the cumulative impacts of the proposal in association with existing and approved development are not likely to have effects so significant as to warrant EIA.

Demolition/Construction

Environmental Statements were submitted with planning application references 18/3111, 15/5550 and 14/4931. All three Statements identified potential adverse impacts in relation to Townscape, Visual Impact and Heritage during construction. 18/3111 also identified potential temporary negative effects during construction in relation to Ecology and Nature Conservation, and 14/4931 identified potential cumulative effects in relation to dust and dirt, negligible impacts in terms of ground water, soils and contamination, and potential for cumulative impacts in terms of air quality.

The developments at 15/5550 and 14/4931 are largely underway. Much of 14/4931 has completed with the remainder expected to complete in the 22/23 year. Cumulative impacts due to construction / demolition with this subject development are therefore not anticipated. In relation to 15/5550 (Wembley Masterplan), much of this proposal has also completed and Plot NW09/10 is due to complete in 22/23. Cumulative impacts are therefore not anticipated in relation to this element of the Masterplan. The remainder of the Masterplan area (North East Lands) is due to complete at a later date and is located further away from the proposed site, and as such cumulative impacts with the proposal are not anticipated.

18/3111 (Wembley Link) is located next to the proposed site and is currently expected to complete in 23/24. Development of the site has commenced. As noted above there is potential for some negative impacts in terms of townscape, visual and heritage, and ecology and nature conservation. Given the expected completion timescales of 18/3111, it is unlikely that there will be significant cumulative impacts during construction on townscape, visual impact and heritage. In relation to ecology, significant cumulative impacts are not anticipated, as the temporary negative affects identified in relation to 18/3111 relate to the clearance of the site, which has already taken place.

It is considered that no likely significant adverse cumulative construction effects will occur assuming the implementation of standard mitigation measures such as appropriate traffic management measures and construction routing; and maintenance of site hoardings and compliance with the mitigation measures detailed within the CEMP.

It is also assumed that the enabling works, demolition and construction phases associated with the other development schemes would adhere to legislative requirements, industry guidance and best practice as will be the case within the application sites. However, there remains the potential for cumulative effects to arise, particularly with respect to dust and noise.

In relation to other approved schemes the construction workers at the construction site of each individual cumulative scheme will have to adopt controls to prevent the significant transfer of airborne pollutants beyond their site boundaries and the use of monitoring to confirm the effectiveness of these measures. Therefore, cumulative effects at existing and future receptor locations would be appropriately managed by the contractors to avoid the occurrence of significant adverse cumulative effects. Cumulative effects during the enabling works, demolition and construction phase are therefore generally considered to be temporary, local and overall not significant.

Operation

Supporting information states that cumulative effects in relation to construction (discussed above), wind microclimate, townscape and traffic are those topics where cumulative effects are considered most likely. Environmental Statements were submitted with planning application references 18/3111, 15/5550 and 14/4931 and all are within 1km of the proposal.

In relation to wind microclimate, 14/4931 is due to complete in the 22/23 year and residual impacts are anticipated to be negligible. In relation to 15/5550, wind conditions were rated as suitable at all locations throughout the site and surrounding area. 18/3111 (Wembley Link) is located in closest proximity to the proposed site and the submitted Environmental Statement notes that the proposal has wind conditions ranging from acceptable for sitting use through to walking use during the windiest season, with some mitigation measures required at some locations.

A preliminary wind assessment has been undertaken for the subject site (as noted in the supporting information) and has considered cumulative schemes within 360m of the site boundary. A wind impact assessment will accompany a future planning application and supporting information states that the increased building massing and height does not have the potential to alter the local wind environment. On this basis, and on the basis of information in other Environmental Statements, significant cumulative effects are not considered likely.

In relation to townscape, the Environmental Statement submitted with 14/4931 notes no adverse cumulative effects on townscape character, views and the settings of heritage assets. The Environmental Statement submitted with 15/5550 states that due to the assumed high quality of cumulative schemes and the proposed development, no adverse effects are anticipated on the townscape character, views and settings of heritage assets.

18/3111 (Wembley Link) is located in closest proximity to the proposed site and the Environmental Statement notes that townscape impacts are anticipated to be (depending on the location) either minor to moderate beneficial, negligible and neutral, or minor neutral. Visually, from all viewpoints with the exception of one, the effect would be neutral or beneficial, with one view (from Horsenden Hill) judged as being moderate adverse but of minor or no significance in visual terms, given the context of other developments coming forward in the vicinity.

In terms of townscape, in the context of the changing urban landscape of London, in which tall buildings have become a more prevalent feature in suburban locations, together with the limited prevalence of designated heritage assets within the vicinity, the impacts are not so significant for the development to be regarded as EIA development.

With regards to the matters considered in this opinion it is not considered that there will be significant adverse cumulative operational effects when the cumulative developments and the proposed development are operational.

In relation to traffic, the Environmental Statement submitted with 14/4931 notes that impacts would be negligible with a small increase of traffic volumes on local roads. In relation to 15/5550, the Environmental Statement states minor positive cumulative impacts are anticipated in relation to driver delay, pedestrian delay, negligible impacts on accidents and road safety. In relation to 18/3111, which is located closest to the proposal, traffic was not scoped into the process as requiring further assessment as part of the EIA.

In terms of traffic, taking into account the lack of on-site parking, it is not anticipated that the proposal will generate a significant amount of additional trips than is the case currently. It is anticipated that CIL and S106 and other funding streams from Government and service providers will address capacity issues that might exist in relation to on and off-site infrastructure.