

Catherine Widdowson  
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London  
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Date: 23rd July 2013

Dear Mrs Widdowson

Re: Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 5 (1) 2011:  
Request for EIA Screening Opinion for Wembley French International School

Thank you for your letter dated 20<sup>th</sup> June 2013 in which you requested that the planning authority adopt a screening opinion of The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 in respect of a forthcoming planning application for the proposed extension, refurbishment and change of use of Brent Town Hall, Forty Lane to create a new primary and secondary school.

The description of the proposed development is to refurbish the main, original building and construct a new annex to the rear to allow the proposed French School (Use Class D1, Non-residential Institutions) to occupy the former Council Office building. It is stated much of the existing internal arrangements of the existing building will be maintained. A number of existing buildings will be removed, including the single storey annex building and freestanding garages to the rear. The print room (formerly the mortuary) attached to the main building will also be demolished.

The Town Hall site is located to the north of Forty Lane and occupies an area of approximately 2.1 hectares. It is bounded to the east by The Paddocks, which is lined by two-storey, large detached houses. Kings Drive forms the site's western boundary, which comprises four storey apartment blocks opposite the site and two storey detached houses to the north. The site adjoins the rear gardens of houses to the north. The south of the site, on the opposite side of Forty Lane is the relatively new multi-storey housing units of the Chalkhill housing scheme. The main building is Grade II listed.

Having considered the proposals as detailed in your letter, Brent Council is of the opinion that the application does not fall within Schedule 1 Development of the Environmental Impact Assessment Regulations 2011 but within Schedule 2 Development, Part 10, Infrastructure Projects (b) – Urban development projects. The application site is 2.1 hectares and therefore falls within the criteria set out for Part 10 (b) as the area of the development exceeds the threshold of 0.5 hectares. However, Brent Council has also given consideration to the characteristics of the development, its location and potential impact as set out in Schedule 3 of the Environmental Impact Assessment Regulations 2011 and the criteria set out in Annex A of Circular 02/99 Environmental Impact Assessments. Annex A indicates the types of case in which, an EIA is more likely to be required. It states:

***"A18. In addition to the physical scale of such developments, particular consideration should be given to the potential increase in traffic, emissions and noise. EIA is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination (paragraph 41)."***

**“A19.** *Development proposed for sites which have not previously been intensively developed are more likely to require EIA if:*

- *the site area of the scheme is more than 5 hectares; or*
- *it would provide a total of more than 10,000 m<sup>2</sup> of new commercial floorspace; or*
- *the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).*

(Reference: DCLG, Circular 02/99 – Environmental Impact Assessments, Annex A, page 44)

Therefore the Local Planning Authority does not consider that the forthcoming application for the redevelopment of Brent Town Hall requires an Environmental Impact Assessment (EIA).

### **Ecology and Nature Conservation**

Paragraph 36 of Circular 02/99 lists land designations where an EIA would, by definition, be required because of the sensitive character of these sites. In these cases, the size thresholds in Schedule 2 Development do not apply.

These designations are:

- a) Sites of Special Scientific Interest, any consultation areas around them (where these have been notified to the local planning authority under article 10 (u)(ii) of the GPDO), land to which Nature Conservation Orders apply and international conservation sites; and
- b) National Parks, the Broads, Areas of Outstanding Natural Beauty, World Heritage Sites and scheduled monuments.

There are no areas which have an ecological designation (as listed above) on or immediately around the site. I am of the view that the proposed development would not cause any significant adverse impacts.

### **Traffic related impacts-Movement and Safety**

The Council does not consider that the development will result in significant impacts on highway capacity to warrant an EIA, as the proposal will not require any significant upgrades to the highway network or access.

The council accepts that the development will lead to some traffic and air pollution within the vicinity of the development but that the impact is not significant when taking into account the existing situation.

### **Contamination**

It is considered that there is a very low risk of contamination associated with the forthcoming proposal for the redevelopment of this site and thus it is not considered to be large enough, complex or unusual enough to require an EIA.

### **Archaeology and Architectural Context**

The site is not located within an Archaeological Priority Area (as defined on the UDP proposals map).

Given it is proposed to preserve and enhance the character and setting of the Grade II listed town hall building through sensitive design, it is not considered that the proposals will have a significant impact giving rise for the need for an EIA.

### **Air Quality and Noise**

The site falls within Brent's Air Quality Management Area. The development will not release significant pollutants or hazardous, toxic or noxious substances into the air and the proposed use is not predicted to have a significant effect upon air quality or traffic generation in the area which would require an EIA.

It is anticipated the proposal will result in an increase in noise levels at certain points of the day. However, it is accepted Forty Lane generates background noise, therefore the change in noise levels will not be significant enough when compared to existing levels to warrant an EIA.

### Other impacts

The council has assessed other possible impacts and effects of the development, and considers that there are none that are significant enough to warrant an EIA.

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Date of Decision: 23<sup>rd</sup> July 2013

On behalf of the Council of the London Borough of Brent



Ken Hullock  
Head of Planning & Transport Strategy