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Our ref CL/13349/NG/CW
Your ref

Dear Sir

Town and Country Planning (Environmental Impact Assessment)(England & Wales) Regulations 2011 - Request for a Formal Screening Opinion

Proposed Extension, Refurbishment and Change of Use of Brent Town Hall, Forty Lane to create a new Primary and Secondary School

On behalf of our client, The French Education Property Trust, we request that the Council provides a formal screening opinion to confirm the requirement for an Environmental Impact Assessment ('EIA') in respect of the proposed demolition of a number of buildings on site, the extension, refurbishment and change of use of Brent Town Hall to create a new French International primary and secondary school on Forty Lane. This request is made in pursuance of Regulation 5 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2011 ('the Regulations').

To enable your consideration of this issue, we set out below the following information:-

- 1 Description of the site and its surroundings
- 2 Description of the proposed development
- 3 Review of the requirement for an EIA

A summary of the content of the proposed planning application has also been provided.

1. Description of the Site and its Surroundings

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.

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The main building is Grade II listed, but is not located within a conservation area. It is currently in use as a Town Hall/Council Offices (Sui Generis use). It was designed by the architect Clifford Strange in a Scandinavian influences Art Deco Moderne style, set out in a “T” shaped form with the three storey façade on an east-west axis. Projecting to the rear, the Paul Daisley Hall comprises a large theatre/auditorium space with large blank brick elevations. The parapet height of the Paul Daisley Hall is 14m above its internal floor level.

Within the northern part of the site, there is a single storey temporary-style annex building and garages.

There are a number of mature trees and areas of planting across the site, most of which are concentrated in the north east of the site, towards The Paddocks. There is an open green area to the north. A low level, formal garden area with some planting bounded by a low wall forms the frontage of the site on either side of the main steps leading up to the entrance. At a higher level, a car parking area is located in front of the building.

The topography of the site has a significant downward slope from north to south, of about 9.4m from the pavement on Forty Lane to the base of the northern boundary wall. The residential properties to the north of the site are approximately 1m higher.

The main staff/visitor parking areas are located to the front of the site providing approximately 107 car parking spaces, with access obtained via Kings Drive and exit obtained via The Paddocks. Additional vehicular access/servicing points are located on Kings Drive. There are various pedestrian access points located around the site.

The site is located within an area with a low probability of flooding (Flood Zone 1). It is located within the Borough’s Air Quality Management Area for traffic related pollutants. The site is not located within an Archaeological Priority Area. There are two nature conservation sites with statutory protection and nine nature conservation sites with non-statutory protection within 1km of the site.

The site is predominantly surrounded by residential properties, with those further to the west located within the Barn Hill Conservation Area, which is characterised by 1920s Mock Tudor detached and semi-detached houses. The conservation area boundary is located approximately 75m to the west of the site, including those properties which front onto Barn Hill.

There is a large Asda supermarket on the opposite side of Forty Lane, to the south west of the site, with Wembley Park District Centre continuing to the west.

The site is well served by public transport. Wembley Park London Underground Station is 500m to the south west of the site, providing Metropolitan and Jubilee London Underground services into Central London, Stanmore, Amersham and Uxbridge.

Forty Lane and Bridge Road are key bus corridors in the local area, with bus stops close to the site both east and west bound. There are a number of bus routes along Forty Lane.

Wembley Stadium is located about 1.6km to the south, but is visible from certain vantage points within the site grounds.

Ark Academy, an “all-through” school is located to the south west of the site.



Fryent Country Park, a large 103 hectare park comprising grassland and small woods, is located approximately 700m to the north of the site.

2. Description of the proposed development

It is proposed to refurbish the main, original building along with a new annex to the rear (north east) to allow the proposed French School (Use Class D1, Non-residential Institutions) to occupy the former Council Office building. The existing occupants of the Town Hall/Council use are relocating to the new Civic Centre, nearby on Engineers Way.

In formulating the design response, the similarity of space requirements of an office building to provide a new school will mean that much of the new function can be accommodated whilst maintaining the existing internal arrangements of the existing building.

A number of existing buildings will be removed, including the single storey annex building and free-standing garages to the rear. The print room (formerly the mortuary) attached to the main building will also be demolished.

It is proposed to erect a part two and part three storey “L” shaped annex, stepping up towards the north of the site. It runs parallel with the eastern elevation of the Paul Daisley Hall and projects into the garden area. It is separated from the existing building by an external courtyard area. The proposed annex is subservient in form, and will retain views of the upper part of the expansive brick elevation of the Paul Daisley Hall. The entrance route and axial view of the entrance doors into the Hall, from The Paddocks, will be retained and enhanced by an opening in the built form.

The proposed school comprises a one form of entry primary school and nine form of entry secondary school with a total of 1,070 pupils and 96 teaching and support staff.

The school will be open Monday to Friday from 07:30 am to 18:30 for normal activities. However, community use will occur at the site with evening classes and some use of the indoor sports facilities likely to be set up, subject to local demand. It is likely that the use of external sports facilities would be restricted to the hours of 08.30 to 18.30.

To assist in your consideration of this Screening Opinion request, we provide the following illustrative drawings.

- 1 Site Location Plan (ref: WFS-SSA-A0-000100)
- 2 Proposed Annex Elevations 1 (ref: WFS-SSA-A0-ALL-ELV-000020)
- 3 Proposed Annex Elevations 2 (ref: WFS-SSA-A0-ALL-ELV-000133)
- 4 Proposed Annex Elevations 3 (ref: WFS-SSA-A0-ALL-ELV-000134)
- 5 Proposed Annex Elevations 4 (ref: WFS-SSA-A0-ALL-ELV-000135)
- 6 Undercroft (ref: WFS-SSA-A3-ALL-GA-UND-000110)
- 7 Lower Ground (ref: WFS-SSA-A3-ALL-GA-LG-000111)
- 8 Ground Level (ref: WFS-SSA-A3-ALL-GA-GND-000112)
- 9 Level 1 (ref: WFS-SSA-A3-ALL-GA-01-000113)



10 Level 2 (ref: WFS-SSA-A3-ALL-GA-02-000114)

11 Roof Level (ref: WFS-SSA-A3-ALL-RF-02-000115)

These are provided at A3, but we can provide full size scale plans if required.

We can confirm that a detailed planning application will be submitted in respect of the above development.

3. Requirement for EIA

The development is one to which the EIA Regulations may apply because it falls within Schedule 2 as an urban development project on a site exceeding 0.5 hectares (category 10(b)). For Schedule 2 developments the Regulations require that an EIA be undertaken where “the development is likely to have significant effects on the environment by virtue of factors such as its nature, size or location”.

In determining whether the development is likely to give rise to significant environmental effects, reference should be made to Schedule 3 of the Regulations. This identifies three categories of criteria:-

- 1 Characteristics of the development (such as size, cumulative effects, use of natural resources, production of waste, pollution and nuisances, and risk of accidents)
- 2 Location of the development (by reference to the environmental sensitivity of the area)
- 3 Characteristics of the potential impact (having regard in particular to the extent of the impact, its transfrontier nature, magnitude and complexity, probability and duration, frequency and reversibility)

1. Characteristics of the development (such as size, cumulative effects, use of natural resources, production of waste, pollution and nuisances, and risk of accidents)

Size

Based upon the plans which accompany the planning application, in summary the proposed scheme will comprise:

- The demolition of a number of buildings, comprising the removal of 1,831sq.m (GEA) of floorspace
- The refurbishment and alteration of the main building
- A new annex building with a footprint of 1,780sq.m and a GEA of 5,071sq.m. It will have a height of 11.6m above the new entrance level and would be 2m lower than the Paul Daisley Hall parapet.

The existing buildings have a gross floor area of 10,644sq.m (GEA). The total proposed floorspace is 13,884sq.m (GEA), which represents an increase of 3,240sq.m (GEA). This equates to an increase in gross floor area of just over 30%.



Cumulative Effects

There are no significant proposed or committed developments in the immediately surrounding area that need to be taken into account when assessing the impacts of the proposed development. This has been discussed with the Case Officer.

We are, however, aware that there is a substantial amount of development currently occurring, or nearing completion, to the south of Wembley Park Station, as part of the Wembley City development around Wembley Stadium. We understand that the final element of Phase 1, the London Designer Outlet, a 350,000sq.ft retail and leisure hub, is currently under construction and will offer restaurants, bars and a cinema alongside retail units.

We understand that Phase 2 is also underway, which comprises new homes and a new shopping street.

The timetable for the proposed commencement on site is currently scheduled for early 2014. As such, the majority of construction works associated with the early phases of Wembley City is likely to be finished or nearing completion before works commence on the application site.

There are no other significant proposed or committed developments in the surrounding area that need to be taken into account when assessing the impacts of the proposed development. Given the above, and the relatively small scale nature of the proposed new build element, it is not considered that the proposed scheme would result in cumulative effects which give rise to the need for an EIA.

The proposed additions and refurbishment are not a complex or hazardous activity and will, therefore, have only localised environmental effects.

Use of Natural Resources and Production of Waste

The development will not result in the significant loss of resources considered to be scarce. The energy efficiency of the development will be in line with local and national policy and legal requirements. The applicant is seeking to achieve a BREEAM 'excellent' environmental rating for the annex to the main building.

The use of natural resources will be typical for an urban development project such as that proposed, as will the production and management of waste. Waste and recycling collection services will take place from a dedicated area within the site. The level and method of waste and recycling is not expected to be significantly different to the existing situation.

Pollution, Nuisances and Risk of Accidents

Given the non-hazardous materials associated with the construction of the proposed annex and refurbishment works and the operation of the school, the effect of pollution and nuisances will be low. Likewise, the risk of accidents will be low, managed in accordance with Health and Safety regulations by Bouygues UK, an experienced development contractor and, therefore, are not significant.

Impacts associated with construction (including vehicular movements, noise and dust) will be localised and temporary and, with the implementation of best practice and legislative requirements, will not give rise to any irreversible impacts on the environment.



At the current time, the hours of working during the construction period have not been determined. It is, however, envisaged that the working hours will be typical of a new school development i.e. Monday to Friday between 08.00 - 18.00 and on Saturday between 08.00 - 12.30pm. It is not anticipated that there would be construction works on a Sunday or Bank Holiday.

The construction contractor will adhere to Environmental Health / noise requirements that are typically imposed upon such development projects. It is likely to be necessary for the contractor to complete a Construction Management Plan to be agreed with the Council in order to comply with a condition imposed on any grant of planning permission. The contractor will be obligated to work within the terms of the Management Plan to ensure that development impacts are managed in accordance with standards set by environmental legislation.

The proposed use will not produce significantly different levels of pollution when compared to the existing use. Although school pupils may create more noise than the existing use during certain times of the day when using outside space, given the site's proximity to Forty Lane and current background noise levels, the proposed use is unlikely to differ significantly to the existing use.

Noise is dealt with below in more detail.

2. Location of the development (by reference to the environmental sensitivity of the area)

The site is not within an environmentally sensitive area as defined within the Regulations.

The proposed development will not affect the absorption capacity of the natural environment (as demonstrated below). The site is not located within a zone at risk of flooding (Flood Zone 1), but due to the size of the site, a Flood Risk Assessment will accompany the planning application that will assess the risk of flooding and surface water drainage).

The site is not located within an Archaeological Priority Area.

The site is located within part of the Borough's Air Quality Management Area for traffic related pollutants. The pollutants involved are nitrogen dioxide (NO₂) and particles that are referred to as PM₁₀ (particulate matter up to 10 micrometers in size).

There are two nature conservation sites with statutory protection and nine nature conservation sites with non-statutory protection within 1km of the site.

3. Characteristics of the potential impact (having regard in particular to the extent of the impact, its transfrontier nature, magnitude and complexity, probability and duration, frequency and reversibility).

The proposal comprises a typical urban development project and would not have significant environmental impacts. In reaching this view, we have identified the following potential impacts:

Highways and Transportation

The site benefits from a Public Transport Accessibility Level (PTAL) rating of 5 (in a range of 1 (poor) to 6 (excellent)), which demonstrates that it is very well served by public transport.



The site is an existing developed site and the proposal envisages the change of use of Brent Town Hall from a Town Hall/Council Office to an educational use.

The proposal envisages a reduction in the number of car parking spaces on the site from approximately 107 to 46, plus the provision of a small area of hard standing which will serve as a coach pick-up / drop off point and an occasional “overspill” parking area (for occasional evening events).

The trip generation calculations undertaken demonstrate that the proposed school will generate approximately 18% fewer vehicular trips than the existing use of the site. Consequently, given the volume of vehicle movements the proposed school is forecast to generate, no material impact will occur on the local highway network or public transport network as a result of the development proposals. This effect is not considered to be significant giving rise to a need to undertake an EIA.

As part of the Transport Assessment that will be prepared to accompany the planning application submission, a detailed audit of existing pedestrian routes and associated infrastructure will be undertaken and, if necessary / appropriate, measures will be proposed to ensure that facilities are both convenient and safe.

Ecology

An Extended Phase 1 Habitat Survey has been undertaken to inform the landscape design and to determine the potential presence of protected species. It has identified two nature conservation sites with statutory protection and nine nature conservation sites with non-statutory protection within 1km of the site.

No protected species were found on site, but an initial bat survey will be undertaken on any trees and buildings impacted by the development. Any vegetation clearance is to be carried out outside the nesting bird season. Provision will be made within the scheme for nesting boxes for birds and bats.

Two invasive plant species were noted on the site (Cotoneaster and Virginia creeper). A method statement will be developed to ensure that the proposed works do not result in the spread of these two species.

A tree survey has been undertaken and will inform the Arboricultural Implications Assessment. Existing retained trees will be protected where they are impacted by the works. More than 25 new trees will be planted on the site to replace those that are removed due to their poor condition or because of the building works.

A new landscape scheme will be developed for the whole site. This gently enhances the open grassed areas on Forty Lane and King’s Drive whilst new woodland shrub and understorey planting will be installed to the area of trees on the east of the site on The Paddocks.

It is not considered that the proposed development would have a significant effect giving rise to the need for an EIA.



Heritage

The existing Town Hall is Grade II listed. The scheme proposes limited intervention to the existing main building as part of the refurbishment works.

The single-storey pre-fabricated office accommodation to the north of the main building (the Town Hall Annexe) and the existing garages to the west of the Paul Daisley Hall are of no architectural or historic interest. Consequently, their demolition as part of the overall scheme is considered beneficial.

Although the printing room (the former mortuary) has a degree of architectural interest, this has been compromised by more recent alterations. As its demolition will allow for the provision of a new annex, which will bring much wider public benefits, its demolition is considered to be beneficial.

Interventions to the historic fabric have been kept to a minimum and, where possible, modern alterations that mask the legibility of the original plan form and detailing of the Town Hall will be removed. New interventions will use a modern and simple palette of materials and will be read as sympathetic and subservient additions to the building. As such, the architectural and historic significance of the listed Town Hall will be preserved and better revealed.

The site is located in a relatively densely built up area of London with buildings ranging from two to nine storeys in height. It is proposed to demolish the existing temporary single storey building to the rear and a number of single storey garages. The extension proposes a high quality design which generally would not impact on the principal elevations of the building. The proposed extension will maintain views of the top element of the Paul Daisley Hall. The axial view from The Paddocks will also be maintained.

Given the limited intervention and sensitive design, which retains the principle elevations and those visible from the public realm, it is not considered that the proposals will have a significant impact giving rise for the need for an EIA, and will preserve and enhance the character and setting of the Grade II listed building.

The site is not located within an Archaeological Priority Area (as defined on the UDP proposals map). Analysis of historic maps shows the site to be open fields before it was developed for its present use. The proposed extension will affect a relatively limited area of the site and it is not considered it will have an impact on any archaeological remains.

On this basis, it is not considered that the proposals will have a significant environmental impact on the heritage of the site or the surrounding area.

Contamination

The site is located within a predominantly residential area and the Town Hall was constructed in the late 1930s and has been occupied by the Council since then. As such, there has been no industrial, or other activities which have occurred on the site likely to result in significant levels of contamination that would give rise to the need for an EIA.



Noise

The site is located within a densely built up area, with the existing building currently in use as Council Offices. The site fronts onto Forty Lane, which is a London Distributor Road and a London Bus Priority Network. The surrounding areas to the north, west and east are predominantly residential properties.

Our commissioned acoustic survey has found that background noise incident on the front façade facing Forty Lane is typically 66dB $L_{Aeq,1}$, which is high. Roof mounted air handling plant for ventilation will be acoustically treated such that noise emissions are below the background noise levels, at adjacent properties, as per planning policy guidelines.

Furthermore, given the anticipated reduced impact on current levels of traffic movement, the overall resultant impact on noise will not be significant.

Given the existing use of the site and its location adjacent to Forty Lane, any increase in noise levels at certain points of the day are not considered to be significant and would not have a significant environmental impact.

Air Quality

As the proposals are relatively small scale in nature, comprising an annex to the main building, and there will a reduction in traffic generation, the proposed development is likely to have a negligible impact on air quality and will not give rise to a need for an EIA.

Flood Risk

The site is located in Flood Zone 1, which confirms that it is not an area at risk of flooding. The nearest identified surface watercourse is Wealdstone, approximately 600m to the south of the site which is classified by the Environment Agency as a “main river”.

A Flood Risk Assessment has been carried out, which will be submitted to accompany the planning application as the site exceeds 1 hectare in area. Sustainable drainage measures are proposed to ensure that there is no increase in surface water run-off. There will be no significant effect giving rise to a need for an EIA.

Socio-Economic

The existing Town Hall is occupied by Brent Council services, which is relocating to the Council's new Civic Centre, Engineers Way, approximately 1.5km to the south of the site. As the existing employees of the Town Hall will relocate to the new Civic Centre, and the proposed school will employ 96 staff, there will be a net increase in employment. Additional temporary jobs will also be created through the construction phase.

The proposed development will provide a high quality educational facility, with some elements available for the local community to use in the evenings and at weekends. The facilities available to the community are likely to include the Paul Daisley Hall, the dining area and some classrooms. This is a significant positive benefit for the local community.



The proposed development will not result in socio-economic environmental effects which give rise to the need for an EIA.

Planning submission

Notwithstanding the LPA's consideration of the requirement for EIA in connection with the proposed development, additional material will accompany the forthcoming planning application to assist in your consideration of the proposed development.

The accompanying material, as agreed with yourself, will comprise:

- 1 Design and Access Statement
- 2 Arboricultural Report and Survey
- 3 Flood Risk Assessment
- 4 Habitat and Ecology Survey
- 5 Heritage Assessment
- 6 Landscaping Design Strategy
- 7 Noise Assessment
- 8 Planning Statement
- 9 Site Waste Management Plan
- 10 Statement of Community Involvement
- 11 Sustainability and Energy Efficiency Statement
- 12 Transport Assessment and Travel Plan

Conclusion

We trust that you have sufficient information to determine whether or not this is an EIA development under the 2011 Regulations. From these Regulations, we note that the local authority has three weeks (beginning from the date of receipt) to form a screening opinion.

Please contact myself or Neil Goldsmith if you have any questions.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Catherine Widdowson'.

Catherine Widdowson
Associate Director