



Executive
12 March 2012

**Report from the Director of
Regeneration and Major Projects**

Wards affected:
Barn Hill, Welsh Harp, Tokyngton,

Brent Town Hall Planning Brief

1.0 Summary

1.1 This report follows on from a recommendations to Planning Committee on 16th November 2011 to undertake a consultation exercise on the attached Development and Planning Brief (Please see Appendix One) to guide the future development of Brent Town Hall. Planning Committee was invited to review and comment upon the contents of the brief and approve a broader more comprehensive consultation exercise. It was also recommended to Planning Committee that the results of the consultation be reported to Executive for approval and subsequent adoption as a Supplementary Planning Document (SPD). The Planning and Development Brief provides detailed guidance for future potential owners of the Town Hall and its site, it indicates what original fabric is important and what elements of the building have potential for sensitive adaptation and alteration. This report explains the need for the brief and the principles that it requires of any new proposals for alteration and development of this important listed building and its curtilage. The site already has an adopted Site Specific Allocation (SSA W3) (See Appendix Three) which has been thoroughly consulted upon, the planning brief is intended to expand upon and provide detailed specific guidance for future owners.

2.0 Recommendations

- 2.1 That Executive notes the contents of the development brief (Appendix One) and approve its adoption as a "Supplementary Planning Document".
- 2.2 That the Executive notes the results of the consultation exercise and agrees the Council's response as set out in Appendix 2.

- 2.3 That the Director, Regeneration and Major Projects is authorised to make further editorial changes to the document in relation to advice from the Council's consultant's advising on the historic building implications and managing the disposal process.

3.0 Detail

Introduction

- 3.1 As Executive is aware the Council is due to relocate its administrative functions to the new Civic Centre on Engineers way in early to mid late 2013, at which time the existing Town Hall on Forty Lane will be surplus to the Council's accommodation requirements.

- 3.2 In preparation for this move the Council has already identified the Town Hall and its site for future disposal and adopted some fundamental policy requirements in its Site Specific Allocation (SSA) Development Planning Document (DPD). The DPD was comprehensively consulted upon, approved and adopted by Full Council in July 2011. The DPD forms part of the Council's Local Development Framework (LDF). The Site Specific Allocation states that further development guidance will be produced, the attached brief (Appendix One) satisfies that requirement of the allocation and builds upon SSA W3 in making provision for:

“Mixed use development including offices, retail (for local needs only), residential, hotel and community facilities ensure the retention of the Listed Building. Any change of use and/or development should enhance and not detract from the character and importance of the Town Hall, and have regard for existing traffic problems to surrounding residential areas and seek to improve these conditions”.

- 3.3 The Town Hall is a Grade II statutory listed building which places certain restrictions on the way in which the building can be altered and the type and level of development within its site. This makes the disposal of the Town Hall a much more complicated exercise than would normally be required for unlisted buildings. (The Town Hall and associated site are illustrated in (Fig.1 within the attached guidance document).
- 3.4 The Council is aware of the past and indeed future significance of the Town Hall for the Borough and to help in securing a sensitive but ultimately successful future use, the attached brief has been produced. The guide deals with many issues but principally it outlines the basic legislative restrictions but also the significant opportunities that the statutory listing represents. The document outlines the Council's expectations for any development scheme and having been consulted upon; it is recommended that the brief be adopted as a “Supplementary Planning Document”. Once formally adopted the guidance within the SPD will become the fundamental requirement of any successful planning application for future change of use and or associated site development.

Significant Issues

- 3.5 The brief through its general and detailed guidance will ensure that the character of the Town Hall is preserved through a new use or mix of uses that is/are sustainable and financially viable well into the future. The brief will require that the following issues are rigorously and sensitively considered by any new potential owners in their

aspirations from the building and the site. The Council has appointed Consultants to help with the disposal of the Town Hall who have contributed to the Brief.

The Town Hall was purpose built for Local Government administration but the nature of its design, the spaces within, the building and its landscape setting offers a strong opportunity for sensitive adaptive reuse. Although opinions are split, the building has a strong architectural presence, a strong relationship with and is within the new Wembley Regeneration Area. However, care will have to be taken in the reconfiguration and conversion of the site and the following principle issues are dealt with and expanded upon within the Development brief:

1. The Grade II Statutory listing will require a sensitive and informed approach to the development of the Town Hall and its site. Although it is likely that changes will be required, they will have to respect the character of the building, its architecture, the nature of internal spaces and volumes; however, uses that require significant remodelling of these internal spaces and volumes will not preserve the established character of the building.
2. Any new uses proposed for the building and its site will not only have to be sensitive to the character and configuration of the historic fabric, but be cognisant of site accessibility, circulation and the needs of the buildings existing neighbours.
3. New buildings within the site will have to be considered in relation to the setting of the Town hall and their potential impact. New building footprints will have to be designed to minimise impact on the predominant role of the Town hall within the site and be subservient in their scale, form and expression.
4. The part that Brent's community and the wider heritage lobby will play in the future of the building and the need to liaise and coordinate with other agencies including most importantly English Heritage.
5. All alteration and or interventions into the structure of the existing buildings will have to be of the most sensitive architectural designs and executed to high construction detail standards.
6. Any new buildings within the site will have to be constructed to high architectural standards making reference to the form and quality of the original architecture whilst at the same time allowing the presence and character of the town hall to predominate.
7. Prospective purchasers or applicants will have to understand the implications of further site development on the site's neighbours and the immediate community. The Council has other guidance to assist with these issues including SPG17 and will expect this guidance to be applied to the design of new buildings and other alterations for the site.

4.0 Consultation

- 4.1 The Council has comprehensively consulted upon the Development Brief inviting a number of statutory bodies, organisations and residents groups to comment upon the guidance. The Council has also written to 275 households in the immediate surrounding area full details are outlined in Appendix Three.
- 4.2 The consultation exercise was extended to six weeks to compensate for the Christmas period; it ran from the 1st December 2011 to the 16 January 2012. The Council received 3 responses 2 by letter and 1 through the website. The respondent's comments the Council's response and the formal representations are shown in Appendix Three.

5.0 Financial Considerations

- 5.1 The preparation and production of the brief as a Supplementary Planning Document (SPD) will be met from existing Regeneration and Major Project's budgets
- 5.2 The sale of the Town Hall is an essential part of the Council's financial strategy for the new Civic Centre and a key element in the business case. The Planning Brief will help to ensure an efficient sales process is carried out and that prospective purchasers fully understand the physical and financial implications of the ownership of the statutorily listed Town Hall.

6.0 Legal Implications

- 6.1 The adopted "Supplementary Planning Document" (SPD) will be supplementary to the "Site Specific Allocations" (SSA) "Development Plan Document" (DPD). The specific allocation SSA W3 (Appendix Three) outlines the basic potential for the site at Brent Town Hall. The preparation of the LDF of which all these documents are a part, including the Wembley "Area Action Plan" (AAP), is governed by a statutory process set out in the Planning and Compulsory Purchase Act 2004. There are also associated Government planning guidance and regulations that applicants and owners will have to comply with. Once adopted with the status of an SPD the Brent Town Hall Planning and Development Brief will become a principal consideration in the decision making and scrutiny of any listed building consent or planning application.

7.0 Diversity Implications

- 7.1 An Impact Needs Requirement Assessment .INRA has been prepared covering the guidance (Please see Appendix Four)

8.0 Staffing/Accommodation Implications

- 8.1 The SPD has been produced, consulted upon using staff resources within Planning and Development, Design Team.

9.0 Environmental Implications

- 9.1 The new Town Hall SPD will guide the sale and development of the site. However, further controls and requirements including the Wembley Area Action Plan will influence impacts on the wider environment, including requiring measures to mitigate climate change. Sustainability appraisal will be undertaken through the life of any application and further supplementary guidance including SPG17 and SPG19 applied.

10.0 Background Papers

Brent Core Strategy July 2010
Brent Site Specific Allocations Development Plan Document
Wembley Masterplan, June 2009

Planning Policy Statement 5 (PPS5) (DCLG)

Historic Environment Planning Practice Guide (PPS5) (DCLG)

Draft Heritage Assessment Report - Kevin Murphy Associates

Contact Officers

Any person wishing to inspect the above papers should contact Mark Smith Design Team, Planning & Development 020 8937 5267

Andy Donald
Director Regeneration & Major Projects

Appendix One – Brent Town Hall Development Brief: Supplementary Planning Document

Appendix Two – Brent Town Hall Development Brief: Consultation Summary

Respondent	Issue	Council Response	Action Taken
English Heritage	<p>“The indicative development within the site is too intensive”.</p> <p>...And at odds with the need to deliver the minimum possible development “</p>	<p>In the present property market it is extremely difficult for the Council and its consultants to understand the minimum possible development site viability will be another complex study. The council needs to provide a flexible brief to help ensure that a new owner is secured</p>	<p>The Council has not specified a particular level of development in the text of the brief. But will remove the indicative drawings that may give an impression of “over development”</p>
English Heritage	<p>“We would advise greater analysis to be undertaken to inform the brief”</p>	<p>The Council has engages a consultant to determine the Heritage value of the Town Hall</p>	<p>The findings of the Councils historic buildings consultant have been integrated into the brief. However the Council expects that further more detailed studies will be carried out when specific concrete proposals are brought forward. The Brief has a further section that identifies the historically and architecturally significant elements of the building and identifies important views into and out of the site. To help preserve the setting Suitable locations for development are shown on plan. (FIG 4) within the brief.</p>
English Heritage	<p>“No reference has been made to National Policy Documentation, “Planning Policy Statement 5” and it’s the associated Practice guide”</p>	<p>The Council is aware of this and has adjusted subsequent versions of the brief.</p>	<p>The brief now refers to the broader national and regional planning policy framework and recommends that potential new owners and developers refer to and comply with the assertions of these documents.</p>
English Heritage	<p>“The Visualisations appear to be extensions which form a substantial barrier around the entire hall</p>	<p>The 3D drawings in the development brief do not completely enclose the hall. The indicative drawings show a pavilion development</p>	<p>A note has been added to the Brief to indicate the development area on (Fig 3) is not intended to be a possible total footprint but an area where elements of</p>

	wing of the Town Hall”	along the West elevation of the Hall and a “C” plan pavilion in the landscape area to the West of the Main hall. The potential for new development is indicate here to minimise impact on the residential areas to the North of the Town hall The Associated plan (Fig 3) shows areas of potential development it does not suggest that a building could completely enclose the rear wing	development may variously be possible.
English Heritage	“We would recommend that a full conservation statement is produced for both the Town Hall and its landscape is undertaken”	The Council has appointed a Conservation Architect to do a heritage study and the findings have influenced the development of this document	The Council will require a full conservation statement to be submitted with any new application for alterations or development at the Town hall
Environment Agency	“We have some concerns that the document lacked reference to the natural environment and green space. The natural environment should feature in this SPD guidance to ensure it is recognized as a priority”	The development brief has been revised to include further guidance on the natural environment	The policy reference section has been amended to include reference to the London plan - Policy 2.18 on Green Infrastructure and Policy 5.10 of the London Plan on Urban Greening
Environment Agency	We are pleased to see that Flood Risk has been identified in Section 7.15 and that the requirement to consult with the Environment Agency has also been identified. An additional sentence here could be added to highlight that due to the site being over 1 hectare a Flood Risk Assessment (FRA) will be required.	The brief will be expanded	The following information will be added to the brief - <i>“As the site is over 1 hectare a Flood Risk Assessment (FRA) will be required.”</i>

Environment Agency	<p>“We have some concerns with Section 7.14 the Hard Landscaping section as we would be looking for soft landscaping solutions, as part of Sustainable Drainage Systems (SUDS) which would need to be identified within a Flood Risk Assessment for the site”</p>	<p>The brief will be revised</p>	<p>The Development Brief has been revised to require SUDs drainage strategies from any new proposals for the site.</p>
Environment Agency	<p>“They (developers) will also need to meet level 3 or 4 Code for Sustainable Homes. For non residential uses we would suggest the applicant investigates the use of water-efficiency measures and aims to achieve BREEAM (BRE Environmental Assessment Method) ‘Excellent’ with maximum ‘water’ credits. This would complement CP19 in your Core Strategy.”</p>	<p>The development brief makes reference to the Councils UDP Core Policies and LDF which describes in detail the Councils policy expectation of any new developments</p>	<p>The Development brief will be clarified to ensure that the Councils broader policies will be applied to the decision making process when assessing any new proposals.</p>
Barn Hill Residents Association 2004”	<p>“I fear that this obsession with restraint based parking will prove costly”</p>	<p>The Councils parking standards are being reviewed by consultants and the adopted standards that are relevant and adopted at the time of any future development will be applied</p>	<p>No changes to the Development Brief proposed</p>
Barn Hill Residents Association 2004”	<p>“Use of green roofs should be a requirement”</p>	<p>The London Plan to which any development will have to comply has a fundamental policy requiring Green Roofs.</p>	<p>Future development may propose green roofs but any development of this type will require careful assessment of the impact through structural loading on the listed structure and or the impact on the listed buildings character.</p>

Barn Hill Residents Association 2004”	“Optimum / close to current number of car parking spaces should be retained.”	The Council is keen to reduce the number of car journeys that development generates as a strategic target	The number of Car parking spaces should be supportive and appropriate to any new use proposed. no adjustment to the development brief proposed
Barn Hill Residents Association 2004”	“Suggest include alternatives to the front external entrance.”	Because of the listed status of the building design control will be retained by The Council and English Heritage	As specific detail design is not part of the brief. No further detailed change is proposed.
Barn Hill Residents Association 2004”	Project management techniques should be required	The brief is not intended to control the way in which future construction or design projects are managed	No change to the brief

Resident Consultation

As part of the broader consultation the Council contacted 275 households within the local community on the following streets. The Councils did not receive any observations or comments from these households:

Barn Hill

Bridge Road

Famborough Close

Forty Lane

Linear View

Greenhill way

Kings Drive

The Paddocks

Appendix Three – Brent Town Hall Development Brief: Site Specific Allocation (SSA W3)

W3. Brent Town Hall

Address: Forty Lane, Wembley, HA9

Ward: Barnhill

Area: 2.1 hectares. (0.5 hectares assumed developable area)

Description:

Grade II Listed Building performing administrative, political and ceremonial roles for Brent Council set within a predominantly suburban context. The site is within short distance to Wembley Park station and is afforded impressive views over the new Wembley Stadium development.



Map W3

Core Strategy policy context:

Core Policies 1, 2, 4, 5, 6, 7, 17, 18, 19, 21 and 23

Planning guidance:

The Council intends to prepare guidance for this site.

Planning history: None relevant

Allocation:

Mixed use development including offices, retail (for local needs only), residential, hotel and community facilities ensuring the retention of the Listed Building. Any change of use and/or development should enhance and not detract from the character and importance of the Town Hall, and have regard for existing traffic problems to surrounding residential areas and seek to improve these conditions.

Indicative development capacity	78 units	78 units
Indicative development phasing	2015 - 16	2017 - 18

Flood risk comments:

A Flood Risk Assessment will be required as the site area is over 1ha. Flood zones are subject to change and modelling and re-modelling is carried out on a quarterly basis by the Environment Agency, therefore any assessment must ensure that the most up to date data is used as part of the Flood Risk Assessment.

Justification:

The building is reaching the limits of its use in terms of purpose and size and the Council is seeking a new Civic Centre within the Wembley Regeneration Area. The existing Grade II Listed building however remains an important visual, social and historic landmark in the borough. The outbuildings to the rear have been added over time and are not subject to the Listing. The sensitive redevelopment of these buildings and appropriate re-use of the main building can enable its continued use and secure its long term restoration.

Notes:

Because of the Listed Building Status, the entire site area has not been used to estimate the indicative development capacity. An assumption has been made regarding an area to the rear of the building, that could possibly be used for development in principle. A more detailed design and feasibility exercise is required to establish the true capacity of this site.

Appendix Four – Brent Town Hall Development Brief: Impact Needs

Department: Regeneration and Major Projects	Person Responsible: Mark Smith
Service Area: Development and Planning Design Team	Timescale for Equality Impact Assessment : 12th March (Executive)
Date: 30 th January 2012	Completion date: 10 th February 2012
Name of service/policy/procedure/project etc: <u>Planning and Development Brief for Brent Town Hall</u> Planning and Development - Design Team	Is the service/policy/procedure/project etc: New <input checked="" type="checkbox"/> Old <input type="checkbox"/>
Predictive <input checked="" type="checkbox"/> Retrospective <input type="checkbox"/>	Adverse impact Not found <input checked="" type="checkbox"/> Found <input type="checkbox"/> Service/policy/procedure/project etc, amended to stop or reduce adverse impact Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Is there likely to be a differential impact on any group? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Please state below:
1. Grounds of race: Ethnicity, nationality or national origin e.g. people of different ethnic backgrounds including Gypsies and Travellers and Refugees/ Asylum Seekers Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	2. Grounds of gender: Sex, marital status, transgendered people and people with caring responsibilities Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
3. Grounds of disability: Physical or sensory impairment, mental disability or learning disability Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	4. Grounds of faith or belief: Religion/faith including people who do not have a religion Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
5. Grounds of sexual orientation: Lesbian, Gay and bisexual Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	6. Grounds of age: Older people, children and young People Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Consultation conducted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Person responsible for arranging the review: N/A	Person responsible for publishing results of Equality Impact Assessment: N/A

Person responsible for monitoring Mark smith	Date results due to be published and where: N/A
Signed:	Date:

Please note that you must complete this form if you are undertaking a formal Impact Needs/Requirement Assessment. You may also wish to use this form for guidance to undertake an initial assessment, please indicate.

1. What is the service/policy/procedure/project etc to be assessed?

A new Supplementary Planning Document published to provide guidance to prospective new owners of the statutorily listed Brent Town Hall and its site.

2. Briefly describe the aim of the service/policy etc? What needs or duties is it designed to meet? How does it differ from any existing services/ policies etc in this area

Brent Town Hall Planning and Development Brief

The aim of the "Supplementary Planning Document" is to provide clear, equitable guidance on the future and development potential of the Town Hall and its site. The guide will outline the type of new uses and mix of uses that would be acceptable and how the building may be altered and or extended. The Building is statutory Listed Grade II and as such will have more significant restrictions on the degree and type of alterations that would be permitted than a non listed institutional building. The guide has been produced to support a disposal process to prevent potential future users having unrealistic expectations of what can and can't be altered or extended on the site. The guide is a specific document dealing with the circumstances for the specific site at Forty lane. There is a large corpus of national and regional guidance that deals with the basic principles of development within the historic environment which is referenced within the Development brief Section 10.0

3. Are the aims consistent with the Council's Comprehensive Equality Policy?

The Council's Equality and Diversity Policy statement makes reference to the importance of ensuring that the services we provide meet the needs of the community. The policy seeks to ensure that everyone has equal access to services, regardless of their race, heritage, gender, religious or non religious belief, nationality, family background, age, disability or sexuality. Services must be relevant, responsive and sensitive, and the Council must be perceived as equitable in its provision of services by its service users, partners and the wider community.

The Planning Brief will assist the Council in an expeditious disposal process; it will assist the Council's agents in explaining the full potential of the building and its site and make this guidance expressly clear to any potential new owner regardless of their nationality, ethnicity, physical sensory or mental impairment, sexuality age or faith. The guide is also supplementary to the Council's "Local Development Framework" and adopted "Core Policies" which have already been through an Impact Needs Requirement Assessment.

4. Is there any evidence to suggest that this could affect some groups of people? Is there an adverse impact around race/gender/disability/faith/sexual orientation/health etc? What are the reasons for this adverse impact?

There is no evidence that any group of people would be adversely impacted upon by the guidance contained within the new document. The guidance is based upon existing published planning and historic buildings policy document national, regional and local. All these policies and strategies have been widely and comprehensively consulted upon at all levels. There may be some minor implications for some potential new uses in that the building is architecturally sensitive in its plan and volumetric configuration making some potential religious proposals for the site more difficult to accommodate. However there is significant experience within the historic environment management field at national and local level to help with compromise in design. The guide cannot specific about this issue until The Council receives a Listed Building

and or planning application from a new owner. There fore there is no negative impact inferred or implied by the Brief.

5. Please describe the evidence you have used to make your judgement. What existing data for example (qualitative or quantitative) have you used to form your judgement? Please supply us with the evidence you used to make your judgement separately (by race, gender and disability etc).

The Council has submitted the development brief to its Planning Committee for permission to carry out a full consultation exercise before submitting the guide to the Council's Executive for adoption. The implication of liturgy is from personal experience and no primary or secondary evidence exists to suggest that this issue will definitely arise - In fact experience suggest otherwise.

6. Are there any unmet needs/requirements that can be identified that affect specific groups? (Please refer to provisions of the Disability Discrimination Act and the regulations on sexual orientation and faith, Age regulations/legislation if applicable)

None identified at the time of submission to the Council's Executive

7. Have you consulted externally as part of your assessment? Who have you consulted with? What methods did you use? What have you done with the results i.e. how do you intend to use the information gathered as part of the consultation?

The Council has undertaken a specific consultation exercise following submission to Planning Committee, with all the National Statutory Consultees including, English Heritage and the Twentieth Century Society Local resident groups and 275 Households that are directly or indirectly neighbours of the site. The Council received submissions for three respondents none raising issues of nationality, ethnicity, physical sensory or mental impairment, sexuality age or faith. The Consultation process was structured around the Council's consultation website, through "Objective Online". However, 270 Households and the statutory undertakers were also individually invited to comment by Letter and E-mail. As well as the specific consultation procedure both the submission of the Planning Committee report and the report to the Executive are published on the Council's website as part of the democratic reporting process.

8. Have you published the results of the consultation, if so where?

The Consultation methodology, scope and responses are described and discussed in the report to executive which is published on the Councils democratic services website as part of the publication of agendas.

9. Is there a public concern (in the media etc) that this function or policy is being operated in a discriminatory manner?

None identified

10. If in your judgement, the proposed service/policy etc does have an adverse impact, can that impact be justified? You need to think about whether the proposed service/policy etc will have a positive or negative effect on the promotion of equality of opportunity, if it will help eliminate discrimination in any way, or encourage or hinder community relations.

No adverse impacts can be identified at this stage

11. If the impact cannot be justified, how do you intend to deal with it?

N/A

12. What can be done to improve access to/take up of services?

a

13. What is the justification for taking these measures?

n/a

14. Please provide us with separate evidence of how you intend to monitor in the future. Please give the name of the person who will be responsible for this on the front page.

The Brent Town Hall Planning and Development Brief will be monitored and facilitated by officers within the Regeneration and Major project Department of the Council and specifically the planning Service

15. What are your recommendations based on the conclusions and comments of this assessment?

No further action or revision of the brief necessary at this stage.

Should you:

- | | |
|--|----|
| 1. Take any immediate action? | No |
| 2. Develop equality objectives and targets based on the conclusions? | No |
| 3. Carry out further research? | No |

16. If equality objectives and targets need to be developed, please list them here.

N/A

17. What will your resource allocation for action comprise of?

N/A

If you need more space for any of your answers please continue on a separate sheet

Signed by the manager undertaking the assessment:



Full name (in capitals please): Mark Vernon Smith
2012

Date: 7th February

Service Area and position in the council:

Planning and development Head of Planning

A handwritten signature in black ink, appearing to be 'Chris Walker'.

Details of others involved in the assessment - auditing team/peer review: Chris Walker Ken Hullock

Once you have completed this form, please take a copy and send it to: **The Corporate Diversity Team, Room 5 Brent Town Hall, Forty Lane, Wembley, Middlesex HA9 9HD**

An online version of this form is available on the Corporate Diversity Team website.