

GREATER LONDON AUTHORITY

[REDACTED]
(By email)

Our Ref: MGLA010920-2491

25 September 2020

Dear [REDACTED]

Thank you for your request for information which the Greater London Authority (GLA) received on 29 August 2020. Your request has been dealt with under the Environmental Information Regulations (EIR) 2004.

You asked for:

I understand that the London Borough of Brent referred the above planning application to the GLA , and that the matter is being dealt with under reference 5444.1.

I should be grateful if you would supply me under the FOIA: copies of any correspondence, emails , minutes of meetings, notes of discussions , notes of telephone conversations and documents supplied to or between GLA officer(s) and Brent Council officers prior to, in connection with or relating to the Stage 1 referral of the above planning application by Brent Council to the Mayor/GLA - in so far as they relate to "heritage".

The "Post Stage 1 response" by the case officer states "Heritage - All matters resolved and no heritage concerns raised at Stage 1", which is a surprise as the application is to demolish a locally listed asset, and described in the attached letter as a building the destruction of which "would be a terrible loss, not only to the local environment, but also to the architectural heritage of Victorian Britain."

Our response to your request is as follows:

Please find attached below the information the GLA holds within scope of your request. Some of the attachments have been placed onto our FOI Disclosure Log due to file size. A link has been included to this in our cover email.

Please note that some names of members of staff are exempt from disclosure under Regulation 13 (Personal information) of the EIR. Information that identifies specific employees constitutes as personal data which is defined by Article 4(1) of the General Data Protection Regulation (GDPR) to mean any information relating to an identified or identifiable living individual. It is considered that disclosure of this information would contravene the first data protection principle under Article 5(1) of GDPR which states that Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject

If you have any further questions relating to this matter, please contact me, quoting the reference at the top of this letter.

Yours sincerely


Information Governance Officer

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at:

<https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information>

1 Morland Gardens

Heritage Impact Assessment

Planning application ref: 20/0345

London Borough of Brent

Wednesday, June 3, 2020

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- Appendix 2 Listing description: Stonebridge Park Public House (Grade II)
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Introduction

1.0

1.1

This Heritage Impact Assessment (HIA) has been prepared by Lichfields on behalf of Brent Council Property and Assets Dept. It assesses the effect of the proposal to demolish and redevelop 1 Morland Gardens (locally listed) on the significance of the building. An application is currently under consideration by the local authority (application ref: 20/0345).

1.2

The locally listed building is located on the corner of Brentfield Road and Hillside (A404) in Stonebridge, Brent. It is a late-19th century building with substantial 20th century alterations and extensions, situated at a busy crossroads. It is not in a Conservation Area.

1.3

This HIA considers the significance and potential impacts on 1 Morland Gardens and the wider historic environment including 2 Morland Gardens (unlisted), Stonebridge Park Public House (Grade II listed), St Michael and All Angels Church (unlisted), and the remains of Stonebridge Park Estate (undesigned fragments of 19th century development). There are no other listed or locally listed buildings, or Conservation Areas in the vicinity of the site.

1.4

In accordance with paragraph 189 of the National Planning Policy Framework (NPPF, 2019), this HIA establishes the significance of the heritage assets to be affected by the proposed development. It then considers the potential effects of the development on that significance (including setting).

1.5

This HIA has been prepared by Lichfields specialist heritage team which comprises full members of the Institute of Historic Building Conservation (IHBC). Lichfields has extensive experience of preparing Heritage Impact Assessments. The assessment has been undertaken in accordance with Historic England guidance.

1.6

A detailed building recording has been undertaken by Compass Archaeology in their Historic Building Assessment (2019), this was submitted as part of the application.



Figure 1-1 View of 1 Morland Gardens (the site) from the Hillside crossroads. Source: Google Maps, June 2019.

Methodology

1.7

The NPPF defines significance as the ‘value’ of an asset based on its ‘heritage interest’, and it defines that interest as archaeological, architectural, artistic and historic. This broadly aligns

with the heritage values outlined in Historic England's Conservation Principles, 2008, which are evidential value, aesthetic value, historical value and communal value.

- 1.8 The overview of the significance of the heritage assets has been undertaken using a combination of desk-based study and archival research. Desk-based references consulted include the detailed Historic Building Assessment prepared by Compass Archaeology (April 2019), Brent's Local List (January 2020), the National Heritage List for England, and relevant historic mapping. Fieldwork was not possible due to the current Covid-19 situation.
- 1.9 The Design Manual for Roads and Bridges (DMRB, Sept 2019) volume 11, LA104 and LA106, provides a helpful guide for attributing value/significance to historic buildings. The methodology for our assessment of significance draws from the NPPF, HE's Conservation Principles and the DMRB:

Table 1.1 Criteria for assessing significance. Source: Lichfields, based on DMRB criteria for assessing significance, LA 104 (2019)

Importance	Designation types
Very High	Very high importance and rarity, international scale and very limited potential for substitution.
High	High importance and rarity, national scale and limited potential for substitution.
Medium	Medium or high important and rarity, regional scale, limited potential for substitution.
Low	Low or medium importance and rarity, local scale.
Negligible	Very low importance and rarity, local scale.

- 1.10 Brent's Local Listing Criteria (date unknown) has also informed our understanding of the significance of the locally listed 1 Morland Gardens.

Consultation/Feedback during determination

- 1.11 A series of pre-application meetings were held in 2019 which discussed the demolition of the locally listed building (subject to testing further options including retention). These meetings are summarised in the submitted Planning Statement (January 2020) and the options are presented in the Design and Access Statement by CLTH Architecture (January 2020). Pre-application engagement during the design development included a site walkaround with CLTH architecture and the Conservation Officer.
- 1.12 A Historic Building Assessment was prepared by Compass Archaeology and was submitted in support of application ref: 20/0345 on February 5th, 2020. It provided a detailed building survey and history of 1 Morland Gardens to Level 3 of Historic England's Building Recording guidelines.
- 1.13 Subsequently, the Principal Heritage Officer requested a Heritage Impact Assessment to consider the significance of the locally listed building and the effects of development, including justification for the loss of the building. This report addresses these requirements. Consultation comments were received raising concerns regarding the demolition of the building. This HIA addresses these comments by considering the significance of the building and assessing its loss in relation to local and national heritage policy.

2.0

Heritage statute and policy

Statute and policy context

2.1

The relevant statutory development plan for the Site comprises the London Plan (2016), the London Borough of Brent Core Strategy (CS, 2010), the London Borough of Brent Site Specific Allocations (SSA, 2011) and the London Borough of Brent Local Plan: Development Management Policies (DMP, 2016). The Regulation 19 Consultation Draft of the new Brent Local Plan was published in 2019 and holds some weight.

2.2

Morland Gardens is allocated in the draft Local Plan under BSSA14 for development for housing with an indicative capacity of 60 units.

2.3

As the setting of a listed building is considered, the Planning (Listed Buildings and Conservation Areas) Act 1990 is relevant. Under Section 66(1) of the Act, there is a statutory requirement to have special regard for the preservation of a listed building and its setting.

2.4

Material considerations include:

- 1 National Planning Policy Framework (NPPF) (February 2019);
- 2 National Planning Practice Guidance: Historic Environment (July 2019);
- 3 The Intend to Publish London Plan (December 2019), which holds substantial weight in the planning process as it is at an advanced stage of preparation. As there is no material difference between the heritage policies of the current and emerging London Plan which would affect this assessment, only the current London Plan is referred to below;
- 4 Historic Environment Placemaking Strategy, Brent Council (May 2019);
- 5 Brent Design Guide, Supplementary Planning Guidance (SPD1, 2018); and
- 6 Relevant Historic England guidance.

Application of policy

2.5

The following are the key heritage policy tests the proposal will be assessed against:

- 1 Does the proposal demonstrate an understanding of the architectural or historic significance of the heritage asset and its wider context; justify its potential impact on the heritage asset and its context as well as any public benefit; retain buildings where their loss would cause harm? (Brent DMP Policy DMP7; Draft Brent Local Plan Policy BHC1)
- 2 Does the proposal give weight to the preservation and, where appropriate, enhancement of the setting and significance of the affected heritage assets with greater weight given the more important the asset? (Paragraphs 192 & 193, NPPF; and London Plan Policy 7.8)
- 3 In weighing applications affecting non-designated heritage assets, has a balanced judgement been taken having regard to the scale of any harm or loss and the significance of the heritage asset? (Paragraph 197, NPPF)
- 4 Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, is this harm outweighed by the public benefits of the proposal? (NPPF para.196)
- 5 Does the proposal comprise high-quality design which has been informed by, and contributes to, the scale and form of the surrounding environment and local distinctiveness? (London Plan Policy 7.4; Brent DMP Policy DMP7; Brent CS Policies CP5 & CP17; Draft Brent Local Plan Policy BD1)

3.0

Baseline conditions

Site and surroundings

3.1

The site, 1 Morland Gardens, is situated on the corner of Brentfield Road and Hillside (A404), adjacent to a busy crossroads. Opposite, to the south, is the unlisted St Michael and All Angels Church (constructed 1891). To the rear of the site is 2 Morland Gardens, an unlisted late-19th century villa constructed in the late 1870s (as 1 Morland Gardens) and also heavily altered and extended in the 20th century.

3.2

The building occupying the site is locally listed but is not within or near a Conservation Area. There are no further locally listed buildings in the vicinity.

3.3

Stonebridge comprises predominantly late-20th century, mid-rise residential development with supporting uses such as shops and places of worship. To the west of the site, the architectural character is mixed, and heights range from 4 to 9 storeys. Beyond the adjacent residential development (The Stonebridge Centre) are the Stonebridge Park Public House (Grade II) and Stonebridge School (Grade II). While, to the north of the site, the mid-20th century, mid-rise buildings continue along Brentfield Road, the east of the site comprises late 19th-century terraces sandwiched between Brentfield Road and the trainline in a more rigid street pattern.



Figure 3-1 The site, 1 Morland Gardens (locally listed). Approximate site boundary in red, St Michael and All Angels highlighted in blue, 2 Morland Gardens highlighted in green and Stonebridge Public House highlighted in purple, all by author. Source: Google Earth, 2020.

Historic development

3.1

A brief summary of the historic development of the general Stonebridge area has been produced by Grange Museum of Community History and Brent Archive (accessed via Brent Council website). A comprehensive summary of the historic development of the site is provided in

Compass Archaeology's Historic Building Assessment (including historic mapping) – for further reference, see application ref: 20/0345.

3.2 Using the above sources, British History Online (BHO) and relevant historic mapping, the historic development of the site and surroundings can be summarised as follows:

- 1 The original Stone Bridge crossing the River Brent was built between 1660-1700 (situated to the north west of the site, no longer extant). Stonebridge Farm was situated near the bridge (potentially pre-dating it).
- 2 Prior to the late 19th century, the site appears to be open fields with Westend Farm to the west and Stonebridge Farm to the north-west. In the vicinity were the medieval and post-medieval settlements of Harlesden (north) and Church End (north-east).
- 3 There was some sporadic development of the area in the mid-19th century with the construction of the Police Station in 1851, the straightening of Harrow Road and the construction of several shops by 1855. The 1874 mapping (see fig.3-2) of the area shows this development is limited and the area (including the site) is predominantly agricultural fields. Dog Lane runs where Brentfield Road now is.
- 4 **The first new developments planned as part of London's expansion into Willesden were Brondesbury in the 1860s and Stonebridge in the 1870s.¹** Following the opening of Stonebridge Station in 1875, Stonebridge Park was developed by 1876 (first visible on the 1894 mapping, see fig.3-3). This was a 35-acre site running north from the Harrow Road (now Hillside) along a new road, Stonebridge Park, which ran beside Dog Lane, and comprised 60 to 80 '**smart new villas for City men**' (Bolton, et al., 1982). Cherry and Pevsner attribute the development to architect Henry Edward Kendall Jr (1805-1885) who was the District Surveyor for nearby Hampstead in 1844. No further information to confirm the extent of Kendall Jr's design involvement has been uncovered.
- 5 The Stonebridge Park Estate appears to have been focused along Stonebridge Park (now part Morland Gardens, part Stonebridge Park and interrupted by Magellan Court). **However, "it was never as grandiose as its planners had originally intended."**²
- 6 This development included, 1 Morland Gardens, dating the site to 1876. It was named Altamira in the late 19th century according to census data in 1891 (see Compass report for more details). 1 Morland Gardens was recorded in 1891 as owned by George Hilliers, Secretary to the São Paulo (Brazilian) Railway Company, his family and live-in staff. To the rear, 2 Morland Gardens (previously referred to as Hurworth) was owned by prominent local historian, F. A. Wood. 2 Morland Gardens is also attributed by Pevsner to Kendall Jr due to his role in planning the estate and the similarities in architectural style.
- 7 **According to Grange Museum's analysis of Stonebridge, further development in Stonebridge occurred in the 1880s and 1890s, including along Melville and Barry Roads (streets now mostly lost to late-20th century development surrounding Hilltop Avenue), as well as to the east of Brentfield Road (formerly Dog Lane). However, this appears to be separate from the Stonebridge Park Estate; the Compass Archaeology report notes "the surrounding areas, however, were built upon during the 1890s and mostly consisted of terraces for the working class, including launderers serving the wealthier district of Stonebridge Park (Bolton, et al., 1982)."**

¹ Diane K Bolton, Patricia E C Croot and M A Hicks, 'Willesden: Settlement and growth', in *A History of the County of Middlesex: Volume 7, Acton, Chiswick, Ealing and Brentford, West Twyford, Willesden*, ed. T F T Baker and C R Elrington (London, 1982), pp. 182-204. *British History Online* <http://www.british-history.ac.uk/vch/middx/vol7/pp182-204>.

² Brief History of Stonebridge, Grange Museum of Community History and Brent Archive [pdf accessed via: <https://www.brent.gov.uk/services-for-residents/culture-leisure-and-parks/brent-museum-and-archives/local-history-resources/brief-histories-of-the-areas-of-brent/>] p.2

- 8 British History Online summarises the Stonebridge development as follows:
- “The earliest development, at Kilburn, Willesden Green, Brondesbury, and Stonebridge Park, was for upper-class housing for merchants and professional men working in the City. Although builders in the other areas would have liked to serve a similar market, the existence of railway workings at Willesden Junction, the proximity of working-class suburbs, and simple demand meant that most of the building in the 1880s and 1890s was for the lower middle and working classes. Willesden was just outside the metropolis with its strict building regulations, and land companies and small builders competed to buy up estates and to cram them with cheap houses.”*³
- 9 St Michael and All Angels Church opposite the site was constructed in 1891.⁴
- 10 Historic mapping from 1894-96 appears to show that the detached villas (of which 1 and 2 Morland Gardens are included) are focused at the south end of Stonebridge Park. The north end of Stonebridge Park appears to be predominantly semi-detached properties with relatively large gardens. A small section of these survive to the north of what is now Gloucester Close; they appear as more modest late Victorian villas with few distinguishable features dating to the Stonebridge Park Estate.
- 11 The 1894-96 mapping indicates a Public House to the east Melville Road (this section of road has since been lost). This appears in the same location as Stonebridge Park Public House which is considered by Pevsner to have been built at a similar time to 1 and 2 Morland Gardens (and the rest of the Stonebridge Park Estate). It is now Grade II listed and its listing description (at Appendix 2) attributes it to mid-19th century (although it does not appear on 1874 mapping). The architect is considered to be Kendall Jr by Pevsner, however we have not uncovered firm evidence for this.
- 12 Stonebridge School (now Grade II listed – listing description at Appendix 3) was constructed in 1899-1900 in a Queen Anne style by GET Laurence and originally functioned as a Board School. It does not appear to have any specific connection with the early Stonebridge Park Estate.
- 13 In the early 20th century, the area was significantly expanded with development. In the immediate vicinity, further terraces were built to the north of Casselden Road (Hazeldean Road/Alric Avenue), between Barry and Melville Roads (Brent Road) and to the south of Hillside. A grouping of smaller terraced houses was added to the end of Stonebridge Park.
- 14 1 Morland Gardens was significantly extended between 1915 and 1937. By 1926, the site was **no longer a residence, but referred to as either the Altamira Working Man’s Club or the Services Rendered Club**. The extensions and alterations may relate to the change of use and development of bar and concert facilities.
- 15 The area became more working class in the early 20th century with several factories and a railway goods depot being based there. In the mid-20th century, the area was redeveloped to address concerns of overcrowding and poverty. Stonebridge Park was nearly entirely redeveloped, with the exception of 1 and 2 Morland Gardens, Stonebridge Park Public House and the small collection of more modest houses on the north side of Stonebridge Park (now north of Gloucester Close). The area surrounding St Michael and All Angels Church was also largely redeveloped.
- 16 Much of the mid-century development was poorly designed and sections were replaced later in the 20th century, for example to the east of the site near the Stonebridge Park Public House.

³ Bolton, et al., BHO.

⁴ Brief History of Stonebridge, Grange Museum

- 17 The site appears to have been substantially altered and extended further between 1967 and 1975 to the west and the north, and again in 1994 when the use was changed to an adult education centre.



Figure 3-2 Extract from Compass Archaeology's Historic Building Assessment, 2019: Extract from 1874 OS six-inch map with site highlighted in red by Compass.



Figure 3-3 Extract from Compass Archaeology's Historic Building Assessment, 2019: Extract from 1894-6 OS six-inch map with site highlighted in red by Compass.



Figure 3-4 View of 2 Morland Gardens. Source: Google Maps, 2019.



Figure 3-5 View of surviving Victorian villas at the north end of Stonebridge Park. Source: Google Maps, 2019.



Figure 3-6 View of Stonebridge Park Public House (Grade II). Source: Google Maps, 2019.

4.0 Significance of heritage assets

- 4.1 In accordance with NPPF para.189 and Brent's Policy DMP7, this section sets out the significance of 1 Morland Gardens using the methodology set out in Section 1 and Brent's local listing criteria as well as other elements of the wider historic environment.

1 Morland Gardens (locally listed)

- 4.2 The significance of the locally listed 1 Morland Gardens lies primarily in the architectural interest of the south and east facades. These were part of the original house and were constructed in an Italianate style with features like the prominent Belvedere Tower, groupings of arched window openings, gabled entrance canopy and surviving sash windows. Otherwise, it has been heavily altered internally and externally by subsequent alterations. There have been several extensions: a bar in 1926, a 1926-37 mushroom-shaped extension; major redevelopment including extension and internal reconfiguration between 1967-75; and 1997 internal and external alterations i.e. adding a glass frontage at the north façade. Many original internal features (fireplaces, cornicing, dado rails, walls, plan form) have been lost during conversion of the house to the Services Rendered Club and then to an education facility/support centre.
- 4.3 It has some limited historic interest as part of the Stonebridge Park Estate, which has now been largely redeveloped. It is located adjacent to another heavily altered house from the period (2 Morland Gardens). As a locally listed building, which forms a residual fragment of development left-over from the 1870s and which can no longer be readily understood as once having a wider setting of contemporary development, the building is of low significance. This is in accordance with the DMRB – a building of low **significance is one that is of 'low or medium importance and rarity, local scale'**. 1 Morland Gardens is of low importance and is a fragment of late 19th Century development of which much of the remainder has been lost and is in any event a frequent occurrence across Brent (i.e. Harlesden and Brondesbury)⁵.
- 4.4 Brent has included it on its local list according to the following assessment criteria and is considered to score 8/12: authenticity - 2, architectural significance - 2, historic/archaeological significance - 2, and townscape significance– 2 (local list entry included at Appendix 1).
- 4.5 Authenticity: The detailed survey of the building produced by Compass Archaeology demonstrates that while many of the external features of the building survive intact on the elevations facing Morland Gardens and Hillside, its intactness has been compromised as later **alterations have eroded the viewer's ability to appreciate the form, scale and massing of the original house**. As such, the assessment in the local list that **the villa is "virtually unaltered"** is incorrect. Pevsner described both 1 and 2 Morland Gardens as **"much altered" in 1951**.⁶ Internally, there is no coherent decorative scheme due to the extensive 20th century alteration. Few original features survive and the examples that remain are simple doorframes and cornicing which is typical of late 19th century interior features. Successive internal alterations have eroded the original domestic plan form which is no longer appreciable. As such, the **'authenticity' is considered to be lower than originally assessed**, scoring 1/3.
- 4.6 Historic significance: The historic interest of the site lies in its association with the 1876 Stonebridge Park Estate of which 2 Morland Gardens, the Public House and a short run of houses north of Gloucester Close is also associated. However, while the former Stonebridge Park

⁵ Brent Museum and Archive, A Brief History of the London Borough of Brent:

https://www.brent.gov.uk/media/387401/Brief_History_of_Brent.pdf

⁶ Pevsner, Buildings of England: London NW. [Referenced by Willesden Local History: http://www.willesden-local-history.co.uk/Altamira_1_Morland.htm]

Estate was originally of some interest as early development in the Stonebridge area, it was typical of the late-19th century suburban expansion of London and has since been almost comprehensively redeveloped. Taken in its wider context, 1 Morland Gardens is not a rare survival, but typical of the eclectic late-Victorian villas seen across Brent. Therefore, the historic significance of the building is considered to be lower than originally assessed, scoring 1/3.

- 4.7 Architectural significance: The Italianate style was popular in the mid-19th century following the construction of Osborne House in 1851, but declined once the Gothic, Tudor and Elizabethan Revival styles became popular. 1 Morland Gardens is a simple example of local interest built after the Italianate style was in high demand. As summarised in the UWE guide, **the Italianate style and Osborne House were “the inspiration for many large villas built in the 1850s and 1860s”.**⁷ As such, the style of 1 Morland Gardens is not particularly rare and a later example; comparable examples are visible across London and the UK.
- 4.8 The architect, Henry Kendall Jr (1805-1885), is known predominantly for both institutional buildings – such as schools, churches and asylums i.e. Harrison Hospital and St Francis Hospital – and for country houses such as Knebworth House. He wrote and contributed to **books on both domestic architecture (i.e. ‘Modern Architecture’, 1846) and institutional architecture (‘Designs for schools and school-houses, parochial and national’, 1847)**, and he worked in a variety of architectural styles. While a versatile Victorian architect of some recognition, 1 Morland Gardens is a comparatively small and modest example of his work. It contributes little to the understanding of his varied and eclectic architectural practice, particularly as the original plan form and external appearance have been eroded by later alterations.
- 4.9 Townscape: The Belvedere Tower and prominence of the building on the Hillside/Brentfield Road crossroads contributes to the surrounding townscape. However, while the south-east corner of the building contributes to the surroundings, other elements of the elevation where the building has been altered and extended – i.e. the south-west part of the elevation – make little contribution to the townscape. Subsequent development to the east and south of the site, as well as along Brentfield Road has increased in scale and the low height of the site is now out of scale with this development.

Summary

- 4.10 **As such, according to Brent’s local listing criteria the following score is more appropriate to the building: 6/12**, due to the authenticity of the building being affected by its 20th century alteration and extension and the lack of its surviving historic context.
- 4.11 In summary and according to DMRB significance criteria (set out in Section 1), the building is of low significance as it is of low historic and architectural importance and of local interest only.

Wider Historic Environment

- 4.12 The surroundings of the site comprise the remains of the Stonebridge Park Estate (site included). These are:
- 1 2 Morland Gardens
 - 2 Stonebridge Park Public House (Grade II)
 - 3 Group of semi-detached villas at the north end of Stonebridge Park

⁷ University of the West of England, Domestic Architecture 1700-1900:
https://fet.uwe.ac.uk/conweb/house_ages/flypast/print.htm

- 4.13 The early Stonebridge Park Estate reportedly included upper middle-class villas, of which only 1 and 2 Morland Gardens survive, and the simpler semi-detached villas at the north end of Stonebridge Park. The Stonebridge Park Public House is noted by Pevsner as part of this early development.
- 4.14 As summarised by BHO, the Stonebridge Park Estate was intended for the merchants and professionals working in the city. Although, as shown by the surviving terraces at the north end of Stonebridge Park, the scale and decoration of the Stonebridge Park estate varied. Since the early 20th century, most of the former Stonebridge Park Estate has been demolished and replaced with the mid-20th century and subsequent modern development along Stonebridge Park. As such, the surviving villas (1 and 2 Morland Gardens) and the Stonebridge Park Public House have lost their historic context as a formally planned suburban estate.
- 4.15 During the late-19th century, there was huge suburban expansion of London comprising late Victorian development ranging from middle class villas to rows of simple terraces with little architectural decoration. The late Victorian suburban expansion is characterised by an eclecticism of different styles by those **builders and architects attempting to avoid the ‘pattern books’** which were becoming common in many smaller developments.⁸ Italianate was a popular style. As such, the Stonebridge Park Estate is not unique in the style of its villas and its historic interest is limited. There is little historic written information available on the early construction and development of the estate which also indicates it is not of great historic interest.
- 4.16 Therefore, while 1 and 2 Morland Gardens, the Public House, and the semi-detached villas at the north end of Stonebridge Park are the only surviving remnants of the Stonebridge Park Estate, they are not rare survivals of Victorian middle-class villas in Brent i.e. Brondesbury Park.
- 4.17 Later additions to the area which were not linked to the Stonebridge Park Estate are: St Michael and All Angels Church (unlisted), Stonebridge School (Grade II) and Victorian terraces to the east of Brentfield Road were later additions to the area dating from the 1890s.
- 4.18 St Michael and All Angels contributes to the appearance of the townscape at the junction as a large, red brick church in a simple, late-Victorian Gothic style. However, it is a later addition to the area not linked to the development of the Stonebridge Park Estate and is not a distinguished building architecturally– **it is not included on Brent’s local list**. Similarly, while Grade II listed, Stonebridge School does not contribute to the understanding of the Stonebridge Park Estate as it was a later addition to the area.

Stonebridge Park Public House (Grade II)

- 4.19 The significance of Stonebridge Park Public House lies primarily in its architectural interest. The building has fine Italianate architectural detailing, such as the cast iron loggia and Doric columns. The listing description does not identify an architect. It is reasonable to assume the architect was Kendall Jr but we have not established concrete written evidence to suggest this. The building also has some historic interest as part of the early development of the Stonebridge area.
- 4.20 Visually, the setting little contribution to the significance of the building. Its immediate surroundings have predominantly been redeveloped including modern development of up to nine storeys in scale.
- 4.21 There is an historic association between the Stonebridge Park Public House and 1 and 2 Morland Gardens due to both being constructed as part of the Stonebridge Park Estate. Therefore, 1 Morland gardens contributes to its significance although the screening by

⁸ Historic England Listing Selection Guides: Domestic 3, Suburban and Country Houses (2017)

intervening development and the existing tall, modern character of the surrounding build environment means the visual connection **has been eroded and it's an historical understanding** that remains only for those who have an understanding of their locality. General users of the area would not readily link the two buildings together.

5.0

Effects of the proposal on significance

Description of proposal

5.1

The full details of the proposal are described in the Planning Statement by Tibbalds, the Design and Access Statement (DAS) and the application drawings, both by Curl la Tourelle Architects. A combination of photographs and application drawings has been used to predict and evaluate the change. The following features are key aspects of the proposal relevant to this assessment:

- 1 Demolition of 1 Morland Gardens;
- 2 Redevelopment of the site with mixed use scheme providing 65 affordable housing units, new education facilities, affordable workspace and community amenity areas;
- 3 Improved public realm, activated street frontage and tree planting; and
- 4 The use of pigmented Glass-reinforced-concrete panels in two red tones drawing from the existing building and surrounding area.

Assessment of effects

1 Morland Gardens (locally listed)

5.2

This building is allocated for development of approximately 60 residential units in emerging local policy (BSSA14, Draft Local Plan 2019) and as such, development at the site is considered desirable.

5.3

Brent DMP Policy DMP7 requires proposals to demonstrate an understanding of the architectural or historic significance of the heritage assets and its wider context. This has been carried out and it has been shown that the building is of low significance and does not contribute significantly to its wider historic context that has largely been lost. The impact of the loss of the heritage asset on the building itself and its wider context has been carried out:

- The development would not significantly harm the wider historic context given that this is not now readily understood through 20th Century redevelopment.
- The planning application has shown that the total loss of the building must be weighed against the significant public benefits that it delivers.

5.4

The policy requires heritage assets to be retained where their loss would cause harm. The loss would not cause harm to the wider historic context. The loss of the building itself must be considered against the NPPF policy for non-designated heritage assets.

5.5

According to NPPF para.197, when considering applications, a balanced judgement needs to be taken on non-designated heritage assets according to the significance of the asset and the scale of harm or loss. As summarised in Section 4 above, the significance of 1 Morland Gardens is low. It has lost much of its historic context due to the 20th century redevelopment of the Stonebridge Park Estate. In order to reach a balanced judgement, this assessment of significance needs to be considered against the proposed total loss of the building.

5.6

As summarised in the previous section, the building is of low architectural and historic interest and its significance has been eroded by substantial later alteration/extension. While attractive, the building is part of a typical middle-class suburban development typical of the late-Victorian expansion of London and not of particular historic or architectural merit. Given that the Stonebridge Park Estate was not of notable quality and typical of the suburban expansion of London, being a surviving remnant of this estate does not afford it substantial historic significance. Therefore, the loss of the building is justified by its low significance when taking

the wider application (the public benefits its delivers) into consideration. The Planning Statement should be referred to when carrying out the balancing exercise, to understand the extent of the public benefits.

- 5.7 In summary, the public benefits of the scheme are substantial providing 65 new homes – 100% of which will be affordable housing – new education facilities (as a Further Education college), affordable workspace and community amenity areas. The proposal provides a cohesive site design which includes an improved public realm and strong building frontage at the corner of Hillside Road and Brentfield Road which introduce townscape improvements at this prominent junction. This is set out in full in the Planning Statement and DAS.
- 5.8 Options for retention of the building were explored in accordance with the national and local policy requirements, and as requested during the pre-application process, to give regard to preservation of heritage assets, where possible. The difficulties retaining this building within a viable development scheme are set out in the Planning Statement and DAS (Appendix A). The retention of the building would inhibit the high-quality design and public benefits of the scheme, affecting the scheme viability and reducing the public benefits that could be delivered. Demolition of the building is manifestly required if the site is to be redeveloped to provide a viable, suitably high-quality and contextually appropriate new mixed-use development.
- 5.9 As such, the loss of 1 Morland Gardens is justified when considering Brent Policy DMP7 in conjunction with NPPF para.197.

Wider Historic Environment

Potential effect of demolition of 1 Morland Gardens

- 5.10 As summarised above, Stonebridge Park Estate is largely indistinguishable from much of the **late Victorian suburban development that characterised London's expansion. Much of the** formally planned estate of the 1870s has been lost and so it does not form a coherent historic townscape, but rather disparate elements.
- 5.11 While there is a lack of direct visual connection between 1 Morland Gardens and Stonebridge Park Public House (Grade II), there is some historic association as both were built as part of the Stonebridge Park Estate. It should be noted that the historic association has been partially eroded by the separation of buildings by intervening modern development and the redevelopment of much of the Stonebridge Park Estate.
- 5.12 The demolition of 1 Morland Gardens will cause some less-than-substantial harm to the setting and significance of Stonebridge Park Public House as it would amount to the loss of an historically associated element. However, this less-than-substantial harm will be at the lower end of the spectrum due to the limited significance of Stonebridge Park Estate. In addition, the significance of the Stonebridge Park Public House lies more in its architectural quality than its association to the former estate. NPPF para.196 states that less-than-substantial-harm should be weighed against the public benefits of the proposal. As such, the substantial public benefits of the redevelopment scheme providing 65 units of 100% affordable house alongside further education facilities and affordable workspace would outweigh the limited less-than-substantial to the setting and significance of the Grade II Public House. Notwithstanding this, great weight needs to be given to this less-than-substantial harm in the decision-making process.

Potential effect of proposed new development

- 5.13 The street layout of the area has changed since Nos. 1 and 2 Morland Gardens were constructed. Originally, they faced Stonebridge Park which was the larger road in comparison to Dog Lane (now Brentfield Road). The widening and upgrading of Brentfield Road over the decades has

meant that this is now the principal route and Morland Gardens is a smaller side street. The construction of the Catholic Church fronting Brentfield Road has increased the massing of buildings fronting Brentfield Road and No. 2 Morland Gardens is now located to its rear facing the side street. This provides some screening of views to No. 2 from the Hillside/Brentfield Road crossroads. Currently, No. 1 Morland Gardens is significantly set back from Brentfield Road beyond a landscaped area and, at its relatively low scale, is a weak element of the townscape given these more recent road interventions. The elevation of the status of this junction – Brentfield Road/Hillside Road – now requires a building of larger scale to successfully address it.

- 5.14 While the proposed development would be an increase in scale directly adjacent to 2 Morland Gardens, it would be consistent with the scale and character of surrounding modern and mid-20th century development on Hillside and Brentfield Road, including the large, red brick Catholic church with tower situated opposite No.2. Lower elements of the scheme would sit adjacent to No. 2 Morland Gardens with the tallest element fronting the junction. It would consolidate the existing setting of St Michael and All Angels Church which is characterised by mid-rise, mid-20th century and later blocks of development.

- 5.15 The massing and alignment of the proposal is appropriate to a large and busy crossroad and the height steps up towards the junction, as the current building does with its Belvedere tower, albeit this is currently significantly set back from Brentfield Road. It would maintain the concentration of massing at the south-east corner, alluding to the existing tower and better addressing and enclosing this large junction location. It would introduce strong and active frontages along the streets, with a number of different entrances from Morland Gardens, Hillside Road and Brentfield Road. As such, the proposal would contribute to the appearance of the townscape, as well as acting as a visual marker for the junction.

- 5.16 The carefully-considered façade design would improve the townscape contribution of the south and east aspects of the site due to its high-quality design and the coherence of the scheme. The proposed design draws from the local environment and its distinctiveness by reflecting existing Italianate details and materials - the arched openings and the polychromatic brickwork (pale and red) of the existing building and the neighbouring 2 Morland Gardens – and introducing them in a modern idiom. Darker red detailing in the existing building is reflected in the darker tone of the base of the proposed building, a dark oxide red. The upper floors will be a light oxide red. The contrasting red tones will be introduced through pigmented glass-reinforced-concrete panels to the upper residential floors which works successfully with the proposed cross laminated timber structure. The ground floors (FE College and workspace) will be a concrete structure. The residential entrances at ground floor have deep reveals and overhanging canopies with the workspace entrances and corner highlighted with arched window heads. The DAS illustrates the distribution of fenestration, solids and voids, which is an appropriate response to the building itself as well as addressing the wider townscape and existing buildings within it.

- 5.17 The existing poor-quality public realm will be replaced with a high-quality public space located at the base of the angled façade onto Brentfield Road. The angles introduced create texture and interest to the building, together with balconies and planters facing both Hillside and Brentfield Road. The DAS describes in detail, the materiality of the proposed scheme.

- 5.18 The scale, form, massing and materiality of the proposed development would not harm the setting of the Grade II listed Stonebridge School or Stonebridge Park Public House due to the existing character of the area (mid-rise and modern) and the recent development in the settings of the buildings. In addition, the intervening modern development would provide some screening.

- 5.19 Furthermore, the above analysis has shown that the effect on the unprotected (not locally listed) St Michaels and All Angels Church is acceptable – the townscape response of the scheme at this corner junction is appropriate and provides significant townscape benefits.

6.0

Conclusion

6.1

This assessment has established the significance of 1 Morland Gardens and has assessed the potential effects of the proposal on its significance as well as the wider historic environment.

6.2

It has been identified that the proposal would meet the heritage policy tests outlined in Section 2 as follows:

- 1 Does the proposal demonstrate an understanding of the architectural or historic significance of the heritage asset and its wider context; justify its potential impact on the heritage asset and its context as well as any public benefit; and retain buildings where their loss would cause harm?

This report has provided a detailed understanding of the significance of the identified heritage assets in order to assess the potential effects of the proposed development. The impact on the wider heritage context is considered to be low. The loss of the building itself can be justified in conjunction with para. 197 of the NPPF and the public benefits the application delivers.

- 2 Does the proposal give weight to the preservation and, where appropriate, enhancement of the setting and significance of the affected heritage assets with greater weight given the more important the asset?

*Yes. **The assessment of significance concluded that the asset's low significance means low weight is given to its preservation.** The proposal has considered the possibility of retention of the heritage asset and found that it would prevent the delivery of a viable, suitably high-quality and contextually appropriate development. Demolition is required to deliver **the site's redevelopment to yield the substantive** public benefits offered by the scheme. This requires the public benefits to be weighed against the loss of the building which is historically associated to a Grade II listed building. The proposed scheme would be an appropriate addition to the setting of the wider heritage assets.*

- 3 In weighing applications affecting non-designated heritage assets, has a balanced judgement been taken having regard to the scale of any harm or loss and the significance of the heritage asset?

Yes. When balanced, the application as a whole (the public benefits it delivers, including townscape improvements, as set out in the accompanying application documentation) can significantly outweigh the total loss of the heritage asset which has shown to be of low significance.

- 4 Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, is this harm outweighed by the public benefits of the proposal?

*Yes. **The less-than-substantial-harm to the setting and significance of the Grade II Stonebridge Park Public House is on the lower end of the spectrum as the historic association with Stonebridge Park Estate is a small element of its significance (which is mostly in its architectural interest).** As such, the substantial public benefits, as set out in the Planning Statement, of the proposal would outweigh this harm.*

- 5 Does the proposal comprise high-quality design which has been informed by, and contributes to, the scale and form of the surrounding environment and local distinctiveness?

*Yes. **The high-quality scheme has been carefully designed to draw from the character and scale of the local environment. It will contribute to local distinctiveness by using design details and materiality of the existing building. It will enhance the existing townscape.***

- 6.3 In summary and in accordance with Brent Policy DMP7 and the NPPF policy tests, the substantial public benefits offered by the scheme – which include 65 100% affordable housing units, further education facilities and townscape benefits – would outweigh the harm of the loss of the locally listed 1 Morland Gardens and the less-than-substantial harm to the significance (via setting) of the Grade II Public House. Great weight must be given to the low level of harm to the significance of the listed building to allow the statutory requirement (Sec. 661 of the Planning (Listed Buildings and Conservation Area) Act 1990) to be carried out.
- 6.4 The accompanying Planning Statement and DAS set out the public benefits and design development in detail and should be referred to when considering the overall heritage balance.

Appendix 1 **Brent Local List Entry for 1 Morland Gardens (January 2020)**

Ward: Stonebridge

**Brent Adult and Community Education Service (Stonebridge Centre),
1 Morland Gardens, Stonebridge, London, NW10 8DY**



Date: 1876

Architect: Henry Edward Kendall Jr.

Style: Victorian

Original use: Residential

Existing use: Education

Conservation area: no

Significance score - 8

Authenticity: 2

Architectural: 2

Historical/archaeological: 2

Townscape: 2

Description

Architectural significance – Capacious and fine 19th Century rustic villa in the Italianate style by Henry Edward Kendall Jr constructed in 1876. Constructed of yellow London stock brick with red brick and stucco dressings. Two stories with projecting gabled roofs supported by decorative bracketed eaves to slate roofs. Three storey square entrance tower with triple round headed windows and gabled entrance canopy. Double hung timber sash windows. Projecting brick string courses a feature as well as half-hipped bracketed slate roofs to windows. In 1995 an extension was added to provide

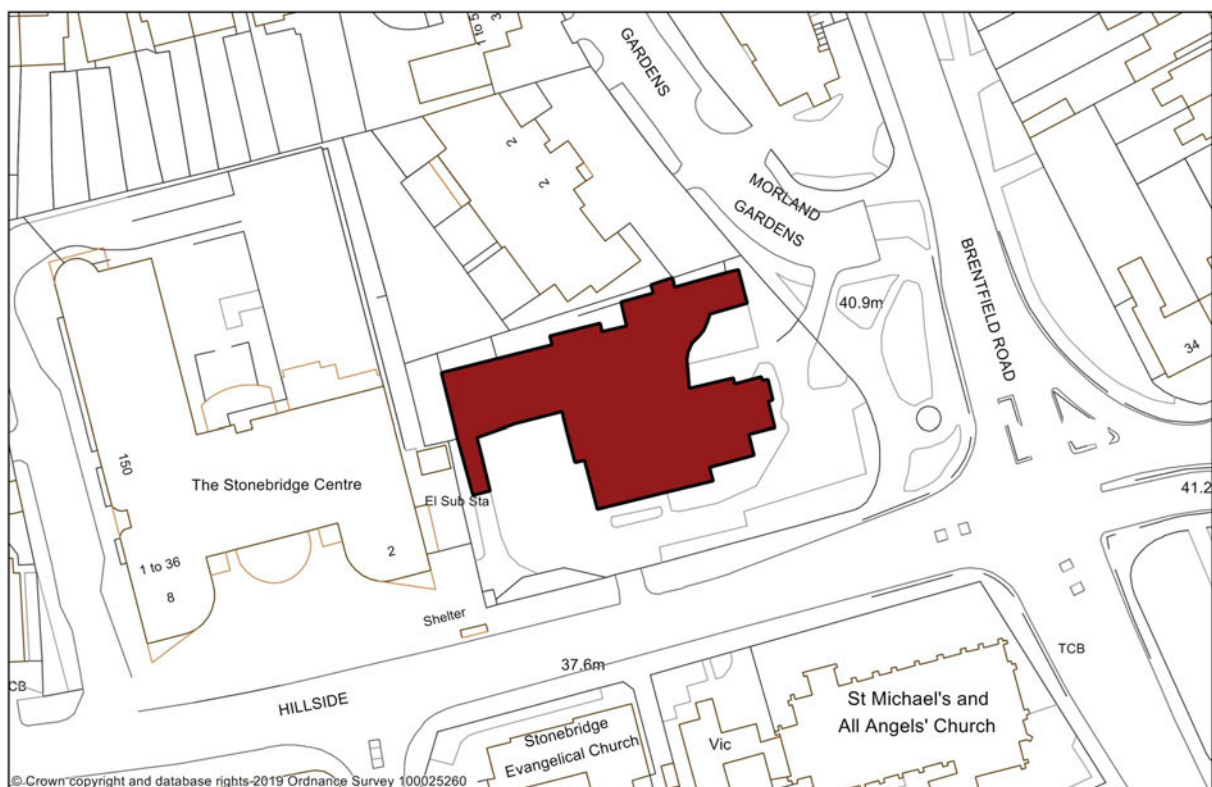
an education centre by Chassay Architects. This is a long low building that was designed to be subservient in nature so that the villa remained a prominent landmark within the streetscene. It is of no special interest.

Historic significance – The Stonebridge Park estate was an ambitious venture by Henry Edward Kendall Junior (1805-1885). It was laid out in 1876 when it was advertised as ‘three miles from Victoria Gate, Hyde Park’, and conveniently served by a direct railway line to Broad Street (now closed). From it remain only two houses, 1 and 2 Morland Gardens and the Bridge Park Hotel (listed grade II). In later years it became the Services Rendered Club. Kendall's works included schools, churches (including St John, Harrow Road, 1844), parsonages, lunatic asylums and many houses including the remodelling of Knebworth House (1843).

Authenticity – The villa is virtually unaltered and well maintained. The 1995 extension has not spoilt the special integrity of the building.

Townscape significance – The building stands out because it is on a corner plot and the tower a prominent feature in the streetscape.

Sources: London 3: North West, Bridget Cherry, Nikolaus Pevsner, Penguin Books, 1991; www.en.wikipedia.org/wiki/Henry_Edward_Kendall_Jr.



Appendix 2 **Listing description:** **Stonebridge Park Public House (Grade II)**

Overview

Heritage Category:

Listed Building

Grade:

II

List Entry Number:

1078882

Date first listed:

15-Mar-1979

Statutory Address:

STONEBRIDGE PARK PUBLIC HOUSE, HILLSIDE NW10

Location

Statutory Address:

STONEBRIDGE PARK PUBLIC HOUSE, HILLSIDE NW10

The building or site itself may lie within the boundary of more than one authority.

County:

Greater London Authority

District:

Brent (London Borough)

National Grid Reference:

TQ 20648 83916

Details

1. 5006 HILLSIDE NW10 "Stonebridge Park" Public House TQ 28 SW 4/7

II

2. Mid 19th century. A fine symmetrical public house; 2 storey centre with extra storey to flanking gabled wings; 8 bays wide; yellow stock brick. Bracketed eaves to slate roofs; flanking wings have splayed ground floor bays; tri-partite first floor windows with segmental pediments; paired

second floor windows with arched heads. Central section of ground floor with central projecting canted bay flanked by twin porches with Doric columns in antis. Continuous range of 6 arched-head windows to first floor with cast-iron canopied loggia over projecting bay and porches. Ground floor public house front somewhat altered.

Listing NGR: TQ2064883916

Legacy

The contents of this record have been generated from a legacy data system.

Legacy System number:

198771

Legacy System:

LBS

Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

End of official listing

Appendix 3 Listing description: Stonebridge School (Grade II)

Overview

Heritage Category:

Listed Building

Grade:

II

List Entry Number:

1393460

Date first listed:

28-Sep-2009

Statutory Address:

STONEBRIDGE SCHOOL, INCLUDING FORMER CARETAKER'S HOUSE, PLAYGROUND SHELTER AND COOKERY AND LAUNDRY TO NW, FORMER MANUAL INSTRUCTION ROOM AND PLAYGROUND SHELTER TO SE, AND BOUNDARY WALLS, GATES AND RAILINGS, SHAKESPEARE AVENUE

Location

Statutory Address:

STONEBRIDGE SCHOOL, INCLUDING FORMER CARETAKER'S HOUSE, PLAYGROUND SHELTER AND COOKERY AND LAUNDRY TO NW, FORMER MANUAL INSTRUCTION ROOM AND PLAYGROUND SHELTER TO SE, AND BOUNDARY WALLS, GATES AND RAILINGS, SHAKESPEARE AVENUE

The building or site itself may lie within the boundary of more than one authority.

County:

Greater London Authority

District:

Brent (London Borough)

National Grid Reference:

TQ 20475 83861, TQ 20508 83838, TQ 20539 83823

Reason for Designation

Stonebridge School is designated for the following principal reasons: * Special architectural interest as a London suburban board school built on an urban scale, which demonstrates the high standards of school design achieved by some school boards on the metropolitan fringes. * A bold and distinctive rendition of the Queen-Anne style with good detailing and a striking silhouette * The school, and outbuildings with their handsome inscriptions, constitute a well-preserved ensemble with strong group value

Details

WILLESDEN

935/0/10093 SHAKESPEARE AVENUE 28-SEP-09 Stonebridge School, including former caretaker's house, playground shelter and cookery and laundry to NW, former manual instruction room and playground shelter to SE, and boundary walls, gates and railings

II Primary school. Built 1899-1900 by Willesden School Board, Middlesex, to the design of GET Laurence.

MATERIALS: Red brick with cut and moulded-brick detailing; Portland stone dressings; clay tile and green copper roofs.

PLAN: Symmetrical rectangular plan on 3 floors, aligned NE/SW. It follows the standardised ER Robson Board School plan of a hall on each floor, with classrooms clustered around it on three sides: 3 parallel to hall on SE side; and 2 to NE and SW in crosswings. Polygonal tourelles set diagonally to NW and SW angles, each containing two entrances (Boys' and Girls') and two staircases.

EXTERIOR: Queen Anne manner. Windows have gauged-brick keyed arches, mainly cambered, and moulded brick cills; those to first floor with scrolled aprons. Moulded string-courses between floors continuing beneath cills. Moulded cornice above. Flemish gables with pinnacles to either side in red-coloured render, on moulded brick corbels. Segmental-pedimented dormers with carved tympana. Main body of school has mullion-and-transom windows with paired timber sashes and top-hung casements above. Principal (NW) elevation of 2-2-2 bays, outer bays set forward and surmounted by gables with tall round-headed windows flanked by small rectangular windows. The tourelles flank this elevation; each comprises a large main tower with octagonal roof and small cupola with lucarnes, and a slender canted stair tower to either side, also with an octagonal roof; top stages are set back. Stair towers have separate Boys' and Girls entrances in stone with carved segmental pediment; tablet on side of latter inscribed 'Stonebridge School'; scrolled pediments to first-floor windows; octagonal green copper roofs. Similar Infants' entrances set in inner angles of tourelles. Modern extension is not of special interest. Rear (SE) elevation of 2-2-2-2-2 bays; central 6 bays are similar to front elevation; outer pairs of bays are set back and have dormers with segmental pediments. Left-hand (SW) bays have repeat

fenestration of the right-hand (NE) bays except that the lower parts of the former are intentionally blind (not blocked); attic also blind. Two ground-floor modified as doors. Side elevations (SW and NE) are of 4 bays with gable to inner 2 bays; the outer 2 bays of the latter have part-blind windows. INTERIOR: Interior generally plainly finished. Plan generally as built, but with some classrooms subdivided. Most doors replaced. Second-floor hall has arch-braced roof. Stairs with simple iron balustrade and brown glazed-brick walls. Brown glazed-brick dados to most areas (some overpainted).

SUBSIDIARY FEATURES: Cast-iron gates and railings on low brick boundary wall; gate piers with stone domed caps.

Outbuildings in complementary Queen Anne style. Along the NW boundary of the playground is a range comprising a long playground shelter supported on cast-iron columns, flanked on the SW side by a single-storey building: the former cookery and laundry (identified in an inscription to carved segmental pediment over the door), with a Flemish gable matching those of the school, and on the NE side by a 2-storey caretaker's house, both buildings with timber sash windows. The house has a timber doorcase on the front (NE) elevation; the right-hand bay breaks forward and has canted bay window to ground floor and large tripartite dormer above with carved segmental pediment and cut-brick scrolled apron; identical dormer to SE elevation. Hipped roof. To the SE boundary is the former manual instruction room (identified in carved inscription to door lintel) of one storey with dormers and Flemish gable end, attached to which is a playground shelter. This range is plainer than that to the NW boundary. Interiors not of special interest.

HISTORY: Until the Elementary Education Act of 1870, education was largely left to voluntary initiatives, with the churches or local charities as the main providers for the poorer classes. The Act, steered through Parliament by William Forster and thus known as 'Forster's Act', actively supported by Gladstone, was the first to set a national, secular framework for the education of children aged 5-13. A driving force behind the Act was the need for a literate and numerate workforce to ensure that Britain remained at the forefront of manufacture and improvement. It required partially state-funded elementary schools to be set up in areas where existing provision was inadequate, to be managed by elected school boards. The churches and other pressure groups had opposed state-provided education. Reactionary opinion generally favoured church schools, and was concerned that secular and radical (as it was perceived) education provided by the board schools may threaten the status quo by teaching the labouring classes to think, but the Act's intention was to supplement rather than duplicate denominational schools in areas of most need. The new legislation resulted in a surge of school building across the country. The Education Act of 1902 steered in by Balfour's Conservative Government abolished the 2,568 school boards and replaced them with Local Education Authorities (LEAs).

ER Robson, appointed as architect to the School Board for London (SBL) in 1871, developed the characteristic Queen Anne style as a secular alternative to the Gothic of Anglican

schools. This interpretation of the red brick, sash windowed, vernacular idiom of houses of the late C17 and early C18 lent itself to a template for the large-scale designs required for schools, as well as for the large windows needed to light classrooms. Robson's 1874 book 'School Architecture' was highly influential, and his standard Board School plan was widely emulated.

Until the late C19 Willesden was still on the rural fringes of London but was transformed into a densely built-up suburb of largely lower-middle and working-class housing after Willesden Junction station was opened in 1866. By the 1880s a clear deficiency in the number of voluntary school places available was emerging and, in the face of considerable opposition from local Anglican churches, the Education Department made an order for the compulsory formation of a school board in Willesden in 1882, and compelled the board to open a temporary school in the Wesleyan lecture hall in Harlesden in 1885, and to build its first board school there in 1891. Before it was superseded in 1904, Willesden School Board opened another 12, mainly large, schools and several special schools. The 15 voluntary schools provided 10,217 places and the board schools another 10,876.

George Evelyn Tidmarsh Laurence (1860-1922) was articled under FE Morris of Colchester and worked for 7 years as an assistant to ER Robson at the SBL. He designed several schools for the Willesden School Board and its successor body, Willesden Education Authority, and for Edmonton, Tottenham and Wood Green school boards, Middlesex. While evidently continuing to practise in London, Laurence became sole architect to the Swansea Education Authority c1891, for which he designed a number of schools, in which capacity he acted until his death.

SOURCES: A History of the County of Middlesex: Volume 7: Acton, Chiswick, Ealing and Brentford, West Twyford, Willesden (1982), pp. 247-254 Cherry, B and Pevsner, N, The Buildings of England, London 3: North West, 1991.

REASONS FOR DESIGNATION: Stonebridge School is designated at Grade II for the following principal reasons: * Special architectural interest as a London suburban board school built on an urban scale, which demonstrates the high standards of school design achieved by some school boards on the metropolitan fringes; * A bold and distinctive rendition of the Queen-Anne style with good detailing and a striking silhouette; * The school, and outbuildings with their handsome inscriptions, constitute a well-preserved ensemble with strong group value.

Legacy

The contents of this record have been generated from a legacy data system.

Legacy System number:
505554

Legacy System:

LBS

Sources

Books and journals

Pevsner, N, Cherry, B, The Buildings of England: London 3 North West, (1991)

'A History of the County of Middlesex' in A History of the County of Middlesex - Acton, Chiswick, Ealing and Brentford, West Twyford, Willesden: Volume 7, (1982), 247-254

Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

End of official listing

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5th June 2020

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Dear ██████████

20/0345 - 1 Morland Gardens Planning Response

A detailed planning application was submitted on 03/02/2020 for the following development:

'Demolition of existing buildings and erection of a new mixed use building ranging in height from two to nine storeys, to provide 65 dwellings (Use Class C3), affordable workspace (Use Class B1), new further education college (Use Class D1), with associated amenity areas, public realm improvements, car and cycle parking and refuse/recycling store'

Subsequent to the application being submitted we have received a number of consultee comments from the Greater London Authority, Transport for London, council officers and members of the public. In response to these comments we have prepared the attached pack of reports and plans. We have summarised the supplementary information below and provided additional commentary as required.

A full schedule of the submitted documents is provided as an appendix to this letter.

Heritage (Litchfields)

A Heritage Impact Assessment ('HIA') has been produced by Litchfields. This report assessed significance and potential impacts on 1 Morland Gardens and the wider historic environment including. In accordance with paragraph 189 of the National Planning Policy Framework (NPPF, 2019), the HIA establishes the significance of the heritage assets to be affected by the proposed development. It then considers the potential effects of the development on that significance (including setting). The report demonstrates that the building is of low significance as it is of low historic and architectural importance and of local interest only.

The HIA is supplemented by information submitted with the original application which set out further detail of the historic context, the site constraints that have led

resulted in the proposed design and the wider benefits delivered by the scheme:

- A detailed building recording has been undertaken by Compass Archaeology in their Historic Building Assessment. This sets out a detailed review of the existing building and demonstrates that the many incremental internal and external changes to 1 Morland Gardens have eroded the historical significance of the building, which is reflected in the non-statutory listing.
- A Design and Access Statement produced by CLTH setting out the design rationale for the proposals and site constraints, demonstrating that redevelopment of the site is not possible without the loss of the existing building.
- A planning statement produced by Tibbalds, demonstrating that the scheme generally complies with planning policy, especially Brent Policy DMP7, para. 197 of the NPPF and the public benefits the application delivers.

In the event that the Local Planning Authority were to consider the value of the building was of medium significance, then the benefits of the scheme are still capable of outweighing the loss of the building for the following reasons:

1. The existing building is not fit for purpose since it was not originally constructed for education purposes. There is a recognised need in the Borough for new adult education facilities and the structure of a Victorian house is not suitable for modern educational needs. The proposed adult education centre will be over a single storey to allow for better access for people with disabilities, something that is impossible to provide for with the current structure. The Victorian structure can also not physically accommodate modern classrooms and the facilities that they require, with the proposed facility providing a significant uplift in floor space.
2. The proposal will deliver 100% affordable housing, contributing to the significant recognised need in the Borough for additional housing, and especially affordable housing.
3. The proposed building will positively contribute to the character of the area. Presently the frontage along the A404 is weak, with the buildings set back from the road and the junction to the south-east. Coupled with the broad and busy roads to the south and east, the result is an uninviting public realm. Bringing the proposed buildings closer to the road and increasing the height on the corner of the A404 and Brentfield Road will result in a much stronger frontage and a prominent building appropriate for the location.

Overall the applicant considers the substantial public benefits delivered by the proposed scheme, primarily 65 affordable housing units, a new further education facility and improved townscape, to outweigh the harm of the loss of the locally

listed building.

Design (CLTH, with input from others as noted)

CLTH have prepared a design response to the comments received, along with an updated pack of plans. The design response addresses the following major topics, along with a number of more minor clarifications:

1. Principle of development and the provision of affordable workspace
2. Offsite play and amenity space
3. Further education access
4. Noise impact
5. Sustainable infrastructure, including further information on gas fired boilers, CO2 reduction and PV cells
6. Green infrastructure, including Urban Greening Factor, Ecological Statement and Tree Strategy
7. Transport infrastructure, including deliveries and servicing, cycling strategy, car parking and access ramp
8. Lighting
9. Fire Strategy

The following documents are appended to the design response:

1. Noise Impact Assessment Report
2. Stage 3b Outline Fire Strategy For Planning
3. External Lighting Ground Level Layout

Highways and Transport (Vectos)

Vectos have prepared two separate responses, one to comments from the GLA and Transport for London and a second in response to comments received from the LB Brent Highways officer.

These comments and updated plans respond to comments received relating to Healthy Streets and the Mayor's Vision Zero Action Plan, site access, car parking, cycle parking, trip generation impacts, deliveries, servicing, construction logistics and travel plans.

Landscape (Planet IE)

Planet IE have prepared separate responses to the GLA comments and LB Brent comments on the proposed landscaping. An updated landscape masterplan and ground floor masterplan have been provided detailed the amendments to the proposals.

Sunlight and Daylight

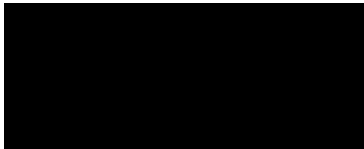
A minor error was identified with the submitted neighbouring sunlight and daylight assessment, with a window that had been mis-identified. The submitted updated Sunlight and Daylight appraisal addresses this error and demonstrates that the proposal is still supportable.

Conclusion

In conclusion, the submitted pack of reports and plans address consultee comments from the Greater London Authority, Transport for London, council officers and members of the public. We trust that this is sufficient to progress the planning application through to determination and please get in touch if you require any further information.

Yours sincerely

For Tibbalds Planning and Urban Design



Director



Enc. Document Schedule
cc

Document Schedule

The following documents are submitted with this covering letter in response to the comments received:

Heritage (Litchfields)

62125_01 1 Morland Gardens - Heritage Impact Assessment 22.05.20

Design (CLTH, with input from others as noted)

200602-GLAReviewResponse-Rev2A

Noise Impact Assessment Report, April 2020, MZA Acoustics

Stage 3b Outline Fire Strategy For Planning

External Lighting Ground Level Layout, April 2020, Max Fordham

Revised drawings (please see drawing register 200604-CLTH-DrawingRegister-PlanningSubmission3 for full list)

Highways and Transport (Vectos)

L01-GLA Response FINAL 200603

L02-Brent Response FINAL 200603

Landscape (Planet IE)

Planit-IE_Response Letter to GLA (6.3)

Planit-IE_Response Letter to Brent Council (7.4)

2092-PLA-XX-ZZ-DR-L-0100-Landscape Masterplan

2092-PLA-XX-GF-DR-L-0101-Ground Floor Landscape Plan

Sunlight and Daylight (Rights to Light)

Daylight and Sunlight Report (Neigh) 020420

Planning Decisions Unit
Greater London Authority
City Hall
The Queen's Walk
London SE1 2AA

5 February 2020
Our ref: 20/0345

Dear Sir/Madam

Town and Country Planning Act 1990 (as amended)
Greater London Authority Act 1999
Town and Country Planning (Mayor of London) Order 2008

Site: 1 Morland Gardens, London NW10 8DY

A planning application, reference 20/0345, has been received by the Council. The application is referable to the Mayor of London as it falls within Categories 1C and 3E of the Schedule of the Town and Country Planning (Mayor of London) Order 2008.

The application description is:

'Demolition of existing buildings and erection of a new mixed use building ranging in height from two to nine storeys, to provide 65 dwellings (Use Class C3), affordable workspace (Use Class B1), new further education college (Use Class D1), with associated amenity areas, public realm improvements, car and cycle parking and refuse/recycling store.'

This letter provides formal notification of the referral of this application under Article 4 of the Order. All submission documents are available to view on the Council website, however I have asked the applicant to send a set of all documents to you electronically (by appropriate method).

I trust you have sufficient information to register this as a Stage 1 referral. Do let me know if you require anything further at this stage.

Yours sincerely,

**Principal Planning Officer
North Area Planning Team
Planning and Regeneration**



INVESTORS IN PEOPLE



POSITIVE ABOUT
DISABLED PEOPLE

Development, Enterprise and Environment

Our ref: GLA/5444/01/RH

Your ref: 20/0345

Date: 9 March 2020

[REDACTED]
Principal Planning Officer

Brent Council
Brent Civic Centre
Engineers Way
Wembley Park
Wembley
London HA9 0FJ

Dear [REDACTED]

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

1 Morland Gardens, Stonebridge, London NW10 8DY
Local Planning Authority reference: 20/0345

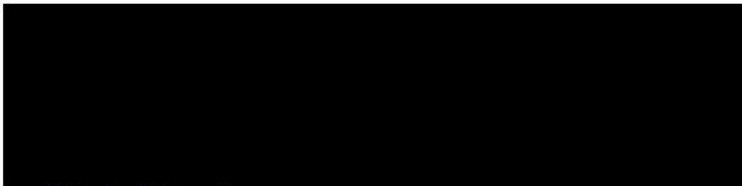
I refer to the copy of the above planning application, which was received from you on 18 February 2020. On 9 March 2020, the Mayor considered a report on this proposal, reference GLA/5444/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor considers that the application does not comply with the London Plan, for the reasons set out in paragraph 65 of the above-mentioned report; but that the possible remedies set out in that paragraph of this report could address these deficiencies.

If your Council subsequently resolves to grant permission on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is [REDACTED] e-mail [REDACTED]@tfl.gov.uk, telephone 0 [REDACTED]

Yours sincerely,



Head of Development Management

cc Navin Shah, London Assembly Constituency Member
 Andrew Boff, Chair of London Assembly Planning Committee
 National Planning Casework Unit, DCLG
 Alex Williams, TfL
 [Redacted] Senior Planner, Tibbalds

1 Morland Gardens, Stonebridge

in the London Borough of Brent

planning application no. 20/0345

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Demolition of existing buildings and erection of a new mixed-use building ranging in height from three to ten storeys, to provide 65 dwellings, affordable workspace and new further education college, with associated amenity areas, public realm improvements, car and cycle parking and refuse/recycling store.

The applicant

The applicant is **London Borough of Brent** and the architect is **Curl La Tourelle Head Architecture**.

Strategic issues summary

Principle of development: The proposed residential-led mixed use development is strongly supported in principle. The replacement further education facility is strongly supported, subject to measures to ensure continued operation. Further information on the provision of the affordable workspace is required (paragraphs 18-22).

Housing: 100% affordable housing, all of which would be social rented, is strongly supported and eligible for the Fast Track Route. A contribution towards off-site play space must be secured (paragraphs 23-27).

Urban design and heritage: The proposed density, height and massing, and architecture are supported. The applicant should demonstrate that the public realm can accommodate the entry, egress and emergency assembly of students safely. The impacts of noise from the development on neighbouring and on site residential uses should be considered and mitigation measures proposed. The applicant should provide a fire evacuation lift within each building core. The loss of the locally listed building is acceptable given the overall scheme benefits (paragraphs 28-39).

Transport: Further information on how the scheme accords with the ten Healthy Streets indicators is required. The proposed servicing arrangements should be reconsidered. The level of cycle parking should be increased and meet London Cycling Design Standards. A Construction Logistics Plan and Delivery and Servicing Plan should be secured by condition; Travel Plans should be secured in the S106 agreement (paragraphs 52-60).

Further information on **inclusive design, energy, air quality, urban greening and biodiversity** is required.

Recommendation

That Brent Council be advised that the application does not yet comply with the London Plan and the Mayor's Intend to Publish London Plan, for the reasons set out in paragraph 65 of this report; but that the possible remedies set out that paragraph could address these deficiencies.

Context

1 On 6 February 2020, the Mayor of London received documents from Brent Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor has until 18 March 2020 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under 1C(c) and 3E of the Schedule to the 2008 Order:

- 1C(c) *“Development which comprises or includes the erection of a building that is more than 30 metres high and is outside the City of London.”*
- 3E “Development — (a) which does not accord with one or more provisions of the development plan in force in the area in which the application site is situated; and (b) comprises or includes the provision of more than 2,500 square metres of floorspace for a use falling within any of the following classes in the Use Classes Order— (xi) class D1 (non-residential institutions).

3 Once Brent Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The 0.4 hectare site is located in Stonebridge in the London Borough of Brent. The site does not have any strategic designations. It is located 550 metres to the north west of Harlesden town centre and the site is near two listed buildings: the Grade II listed Stonebridge Park Public House and Stonebridge School.

6 The site has an allocation for development in the draft Brent Local Plan (2019), which is at publication stage, reference BSSA14. The site allocation gives an indicative site capacity of 60 homes. It is currently occupied by the Stonebridge Centre, a further education college (adult education centre), situated within a locally listed Victorian building and its modern additions. A public garden is located at the eastern end of the site, comprising plant beds, trees and a circular metal sculpture. The site is located on a slope, rising from west to east.

7 The site is bounded by 3-storey residential building to the north along Morland Gardens. The site is accessed from the cul-de-sac of Morland Gardens where the road would have originally joined Brentfield Road, which bounds the site to the east. Hillside Road is located to the south of the site, across from which are St Michael's and All Angels Church and Stonebridge Evangelical Church. To the west the site is bounded by a 5-storey residential development, with the BrentHub Community Enterprise Centre, a GP surgery and Tesco Express retail store at ground floor.

8 The nearest rail station is Harlesden station approximately 750 metres to the south, which provides access to London Overground services. Neasden station is approximately 1.8 kilometres northeast of the site and offers London Underground Jubilee Line services. Bus stops located within 120 metres of the site on A404 Hillside provide access to one bus route, while a further two routes are accessible within 250 metres on Knatchbull Road. Consequently, the site is afforded a public transport access level (PTAL) of 4, on a scale of 0 to 6b where 6b is the highest. As such the site has good access to public transport.

9 The nearest part of the Transport for London Road Network (TLRN) is the North Circular Road (A406) approximately 900 metres to the west of the site. The nearest part of the Strategic Road Network, the A404 Hillside, is adjacent to the site. The local cycle network includes Quietway 16 which can be accessed approximately 800 metres south of the site. Quietway 16 is a traffic-free route running along the Grand Union Canal between West Drayton and Paddington.

Details of the proposal

10 The applicant is proposing the demolition of all existing buildings and the construction of 750 sq.m. of affordable workspace, a 2,651 sq.m. further education college and 65 social rented units in buildings ranging from three to ten storeys.

Table 1: Proposed floorspace

Floorspace (GIA) by use	Existing (sq.m.)	Proposed (sq.m.)	Change (sq.m.)
Further education college (D1)	1,630	2,651	+1,021
Workspace (B1)	0	750	+750
Residential (C3)	0	6,141	+6,141
Total	1,630	9,542	+7,912

11 The affordable workspace would be located at the lower ground floor and would be accessed from the lower end of Hillside Road. A two-storey atrium multi-functional space would provide a connection between the affordable workspace and the further education college above. Two multi-faith rooms would be accessed from this space. Nine car parking spaces, cycle parking and plant and servicing would also be provided at this level, with access to the car park from the north of the site via the existing access on Morland Road.

12 The further education college would be provided on the upper ground floor and would be accessed from Brentfield Road, at the upper end of the sloped site. This would comprise multiple classrooms, a library and archive, a hall, cafe, craft room and staff facilities. The existing public garden between the main entrance and Brentfield Road would be retained and improved, although would be smaller than the existing garden.

13 The residential units would be accommodated above the further education college, accessed from two cores; one at the lower end of Hillside Road and one further to the east at the upper end of Hillside Road. The units would be contained within two

towers and two lower connecting elements, surrounding a central podium courtyard containing play space and landscaping. The western tower would be seven storeys in height (from lower ground floor) and the eastern tower would be part seven and part ten storeys in height. A further area of shared and private amenity space is provided to the west of the main podium and a shared roof garden is provided on the seventh floor of the eastern tower.

Case history

14 There is no strategic planning history associated with this site.

Strategic planning issues and relevant policies and guidance

15 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises Brent Council's Core Strategy (2010), Development Management Policies (2016), Site Specific Allocations (2011) and the 2016 London Plan.

16 The following are also relevant material considerations:

- The National Planning Policy Framework (revised February 2019);
- National Planning Practice Guidance;
- The London Plan Intend to Publish version (December 2019); and
- Draft Brent Local Plan (Stage 3 – Publication Stage).

17 The relevant issues and corresponding policies are as follows:

- | | |
|---------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| • Social infrastructure | <i>London Plan; Social Infrastructure SPG;</i> |
| • Affordable workspace | <i>London Plan;</i> |
| • Housing | <i>London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG;</i> |
| • Affordable housing | <i>London Plan; Housing SPG; Housing Strategy; Affordable Housing and Viability SPG;</i> |
| • Urban design & heritage | <i>London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;</i> |
| • Inclusive design | <i>London Plan; Accessible London: achieving an inclusive environment SPG;</i> |
| • Environment | <i>London Plan; Sustainable Design and Construction SPG; London Environment Strategy;</i> |
| • Transport & Parking | <i>London Plan; Mayor's Transport Strategy.</i> |

Principle of development

Further education college

18 London Plan Policy 3.16 and Intend to Publish London Plan Policy S1 identify that additional and enhanced social infrastructure provision is required to meet the needs of London's growing and diverse population. London Plan Policy 3.18 and Intend to Publish London Plan Policy S3 seek to ensure a sufficient supply of good quality education facilities to meet demand and offer choice. The main considerations of relevance to this

application are that educational facilities should: be located in areas of identified need; be accessible by public transport; maximise the extended or multiple use of educational facilities for community or recreational use; encourage the shared use of services; and be accessible and inclusive. Development proposals should result in no net loss of educational facilities.

19 The proposal would include the provision of a 2,651 sq.m. further education college. The new further education college would be on the site of an existing college, although it would be 63% larger. The applicant notes that whilst the existing centre is well used, it is limited and restricted by the lack of space and by functional and accessibility restrictions. As such, there is a clear rationale for an expanded and improved further education college on the site; however, the applicant should clarify the estimated number of future students at the college to address urban design and transport matters. The applicant should also explain how the continued use of the college will be facilitated during construction of the development. The site has a PTAL of 4 and so is easily accessible by public transport, walking and cycling. The facilities would include a cafe open to the public; the applicant is encouraged to consider whether any other facilities could be used by community groups and the Council should secure a community use agreement for this. Overall, the principle of the proposed replacement educational use with enhanced facilities on this site is strongly supported. The application responds positively to the objective of making the best use of public land to provide enhanced social infrastructure, in line with Intend to Publish London Plan Policy S1.

Affordable workspace

20 The Mayor's Intend to Publish London Plan Policy E3 sets out defined circumstances for the provision of affordable workspace, which is let at sub-market levels. The policy states that such workspace should serve a specific social, cultural and economic development purpose. Furthermore, affordable workspace should be provided in areas identified in a local Development Plan Document where cost pressures could lead to the loss of affordable workspace or where such workspace would sustain a mix of business or cultural uses which contribute to the character of an area.

21 There would be a clear synergy between the re-provision of the further education college, which would continue to run a variety of vocational courses, and the provision of affordable workspace. However, whilst this benefit is supported, the applicant has not provided any information on the affordable workspace in terms of planning policy. The applicant should clarify which sectors the affordable workspace is intended to support and how it addresses identified cost pressures or sustains a mix of business or cultural needs, with reference to the adopted and draft Brent Local Plan, the London Plan and the Mayor's Intend to Publish London Plan. The rent levels and management arrangements for the affordable workspace should be secured within the S106 agreement.

Housing

22 London Plan Policy 3.3 sets Brent a housing completion target of 15,253 units between 2015 and 2025, which is increased to 23,250 units between 2019/20 and 2028/29 in the Mayor's Intend to Publish London Plan Policy H1. The proposal to introduce residential use to this under-utilised site responds positively to London Plan and the Mayor's Intend to Publish London Plan policies to increase housing supply and optimise the use of public land, which is supported.

Housing

23 The following residential unit breakdown has been provided with the application:

Table 2: Proposed housing provision

Housing type	1 bed units	2 bed units	3 bed units	4 bed units	5 bed units	Total units
Social rented	26	18	10	7	4	65
Percentage of units	40%	27.7%	15.4%	10.8%	6.1%	

Affordable housing

24 London Plan Policy 3.9 seeks to promote mixed and balanced communities by tenure and household income and Policy 3.12 seeks to secure the maximum reasonable amount of affordable housing. Policy H4 of the Mayor's Intend to Publish London Plan and the Mayor's Affordable Housing and Viability SPG set a strategic target of 50% affordable housing. Policy H5 of the Mayor's Intend to Publish London Plan and the Mayor's Affordable Housing and Viability SPG set out a 'threshold approach' whereby schemes meeting or exceeding a specific threshold of affordable housing (in this case 50% on public land) by habitable room without public subsidy and which meets other criteria are not required to submit viability information to the GLA, nor would the application be subject to a late stage review mechanism. At a local level, the draft Brent Local Plan (2019) sets a new borough-wide strategic target of 50% affordable housing.

25 The applicant proposes to deliver 100% of the scheme as social rented affordable housing. This offer is strongly supported and exceeds the 50% threshold for the Fast Track Route for this type of application on public land as described in Policy H5 of the Mayor's Intend to Publish London Plan and the Mayor's SPG. As the offer is 100% affordable housing, exploration of grant funding is not required. As the 100% affordable housing offer is entirely social rented, no further discount or increase in affordable housing can be achieved and so an early stage review is not required. The rent levels for the social rent units must be secured within the S106 agreement.

Housing choice

26 London Plan Policy 3.8 and the Mayor's Intend to Publish London Plan Policy H10 encourage a full range of housing choice. For low cost rent, boroughs should provide guidance on the size of units required to ensure affordable housing meets identified needs. The application proposes 32% of the units as family-sized, which addresses the strategic need for this type of accommodation and is supported.

Children's play space

27 Policy S4 'Play and informal recreation' of the Mayor's Intend to Publish London Plan and London Plan Policy 3.6 seek to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 sq. m. per child. The proposal would provide 300 sq.m. of dedicated play space, which is significantly below the calculated requirement of 643 sq.m. of play space as set out in the Mayor's SPG; however, the play space would

exceed the calculated provision of 241 sq.m. for children aged 0-5 years old. The applicant has identified play space at Lawrence Avenue within 400 metres of the site but this is not dedicated play space for children aged between 5-11 years. The applicant has identified play space for children aged 12+ years old at Stonebridge Recreation Ground around 400 metres away and at Paulet Way and Gibbons Recreation Ground, both within 800 metres of the site, which is acceptable. The applicant has acknowledged the lack of dedicated play space for 5-11 year olds and is willing to make a financial contribution towards off-site play space. This is welcomed and would address the deficiency of on-site play space and should be secured within the S106 agreement.

Urban Design

28 London Plan Policies 7.1 and 7.4 and the Mayor's Intend to Publish London Plan Policies D1, D2 and D3 seek to ensure that new developments are well-designed and fit into the local character of an area. New buildings and spaces should respond to the form, style and appearance to successfully integrate into the local character of an area, with a positive relationship with the natural environment and respect and enhancement of the historic environment.

29 The general layout is supported. The proposal effectively optimises the ground floor uses and change in site levels by making use of the space underneath the further education college for affordable workspace, car parking and servicing. This enables the main frontages of the development to be well activated. On the upper floors, the layout of the units is logically oriented around a central green space and the location of the two residential towers next to Hillside helps to mitigate the impacts of the development on neighbouring residential properties to the north. The proposed shared private amenity space is well laid out, with a variety of more public and more secluded spaces, with effective use made of the limited available space for play space and landscaping. The use of the pitched roofs of the further education college for play equipment and skylights is particularly creative.

30 The proposal would retain an area of public realm to the east of the development along Brentfield Road in place of the existing public garden. Given that this space is contained between the main entrance of the college and Brentfield Road, it will be extensively used by students arriving and leaving the college. This space is stated to be the same size as existing, although it appears narrower than before. Officers are therefore concerned that the space is insufficient to accommodate the number of students using the college safely, with the potential for students to spill out onto the road, creating conflict between pedestrians and vehicles. The applicant should clarify how many students would be using the college and demonstrate that the public realm in this area is sufficient to allow for the safe entry, egress and emergency assembly of students from the development. The applicant should set back the building line further into the site if the space is insufficiently large. The applicant should also consider retaining some of the existing trees in this area.

31 The proposed maximum building heights are noticeably taller than the immediate surroundings, although the approach to massing has been sensitively considered to break up the two tallest elements and step down to the low-rise context to the north. The proposed height would be similar to nearby developments, including the nine storey Camellia Heights. The location of the tallest tower on the junction of Hillside and Brentfield Road will mark this key intersection and aid with wayfinding to the further education

college. The development includes a varied roof line, which creates a visually interesting development and avoids a “wall-like” massing.

32 The proposed architecture is supported. At ground floor the facade would feature a strong red band and arched entrances, with large windows facing onto Hillside. This would create a distinctive and active frontage around all of the public areas of the building, allowing views into the activities of the further education college and workspace, which is strongly supported. The main balconies are well integrated into the facade, providing a strong repeating pattern to the development. The cantilevering curved balconies are a thoughtful addition to the facade that provide variety and subtly extend the amount of external amenity space for each unit. The units connecting the two towers are also well designed, with large areas of external amenity space for each unit. The proposed arched parapets and balcony trims are an elegant reference to the existing Victorian house and the parapets are effective at hiding the plant on the roof. The Council should secure details of facing materials and building details such as roof lines at by condition to ensure a high quality of materials and architecture is secured.

Agent of change

33 The Mayor’s intend to publish London Plan Policy D10 requires applicants to take account of the Agent of Change principle and consider and mitigate for existing noise and other nuisance generating uses in a sensitive manner in new development. The proposed expanded further education college has the potential to generate additional noise, which could affect receptors in neighbouring residential properties as well as in the residential properties above it. The submitted noise assessment only considers the impact of noise on the development; the applicant should consider the impacts of noise from the development on neighbouring and on site residential uses and propose appropriate mitigation measures.

Housing quality

34 London Plan Policy 3.5 and the Mayor’s Intend to Publish London Plan Policy D6 promote quality in new housing provision, with further guidance provided in the Mayor’s Housing SPG. All of the units would meet the London Plan and the Mayor’s Intend to Publish London Plan minimum space standards, which is supported. Most of the units would meet or exceed the private amenity space requirements. Unit 02-08 has 0.5 sq.m. and unit 03-04 has 1.8 sq.m. less private amenity space than required; the applicant should increase the provision of this amenity space and demonstrate that the spaces are practical in terms of shape and utility. 75.4% of the units would be dual aspect and there are no north-facing single aspect units, which is supported.

Fire safety

35 In accordance with Policy D12 ‘Fire safety’ of the Mayor’s Intend to Publish London Plan, the applicant has produced a fire statement, produced by a third party suitable qualified assessor. The statement includes details of: the construction methods, products and materials; the means of escape for all building users; features which reduce the risk to life, including sprinklers in all apartments; access for fire service personnel and equipment; and access for fire appliances. The applicant should consider how future modifications to the building will not compromise the base build fire safety and protection measures. The applicant should also provide a fire evacuation lift within each building core for the evacuation of wheelchair users and other less mobile occupants.

Heritage

36 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions *“should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”*. If harm is identified, it should be given considerable importance and weight.

37 The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Policy HC1 'Heritage conservation and growth' of the Mayor's Intend to Publish London Plan, as well as London Plan Policy 7.8, states that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets.

38 The site includes a locally listed Victorian building that is proposed to be demolished. This would be contrary to London Plan and Intend to Publish London Plan policy, however the NPPF (paragraph 197) is clear, in relation to non-designated heritage assets, that “a balanced judgement will be required having regard to the scale of harm or loss and the significance of the asset”. In this instance, the demolition of the building would lead to a total loss of significance. However, the proposed development would deliver considerable public benefits, including a modern further education centre, workspace and 65 social rented residential units. It is clear from the submission that the existing building is not fit-for-purpose. Furthermore, the applicant's submission demonstrates that extensive consideration has been given to alternative configurations that retain the locally listed building. These were understandably ruled out as they don't deliver the required improved educational facilities. As such, on balance, the loss of the locally listed building is considered acceptable in this instance.

39 The site is near two listed buildings: the Grade II listed Stonebridge Park Public House and Stonebridge School. The applicant has not provided any assessment of the impacts on the Stonebridge Park Public House and Stonebridge School. Officers consider that intervening development would substantially, if not completely, obscure the proposal. As such there would be no impact on the setting of these two listed buildings and no harm to their significance as a result of the development.

Inclusive design

40 London Plan Policy 7.2 and the Mayor's Intend to Publish London Plan Policy D3 seek to ensure that proposals achieve the highest standards of accessible and inclusive design (not just the minimum) ensuring that developments can be entered and used safely, easily and with dignity by all; are convenient and welcoming with no disabling

barriers, providing independent access without additional undue effort, separation or special treatment; and are designed to incorporate safe and dignified emergency evacuation for all building users. It is not clear how wheelchair users can access the multi-faith rooms; a lift is shown between lower ground and upper ground floors and the applicant should clarify if this is for general use. The further education college would be located entirely on one level (with the exception of the multi-faith rooms), which avoids barriers to access and is strongly supported. The remainder of the non-residential development could also achieve the highest standards of accessible and inclusive design, subject to addressing the lack of inclusive cycle parking as detailed in the transport section.

41 Policy 3.8 of the London Plan and the Mayor's Intend to Publish London Plan Policy D5 requires that at least 10% of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. The proposal would provide 10% of homes as wheelchair accessible, equivalent to 7 homes. The Council should secure M4(2) and M4(3) requirements by condition as part of any permission.

Sustainable infrastructure

Air quality

42 The application is for a major development within an Air Quality Management Area. As such, in accordance with London Plan Policies 3.2, 5.3 and 7.14 and the Mayor's Intend to Publish London Plan Policy SI1 an Air Quality Assessment is required. Policy SI1 states that this should take an Air Quality Neutral approach.

43 The Air Quality Neutral assessment has not been carried out correctly, and therefore compliance with London Plan Policy 7.14 and the Mayor's Intend to Publish London Plan Policy SI1 cannot be determined. The Air Quality Neutral assessment must assess both building and transport emissions for all proposed land use classes. A scheme of mitigation should be proposed to address any exceedances of the Air Quality Neutral benchmarks. The reduction in car parking compared to existing uses is, however, welcomed.

44 An assessment of the emissions from the gas-fired boiler has not been undertaken, and it is not known whether there will be adverse impacts on air quality as a result. Compliance with London Plan Policy 7.14 and the Mayor's Intend to Publish London Plan Policy SI1 cannot therefore be determined. Building emissions must also be taken account in the revised Air Quality Neutral assessment. The assessment has determined there will be exposure to poor air quality (exceeding the air quality objectives) in some parts of the proposed development closest to roads. The impacts of the proposed gas-fired boilers on existing off-site receptors and proposed on-site receptors should be assessed using dispersion modelling should emissions exceed the IAQM/EPUK screening criteria. The applicant must submit details of a mitigation scheme to ensure future occupants are exposed to acceptable air quality.

Energy

45 In accordance with the principles of London Plan Policy 5.2 and Policy SI2 of the

Mayor's intend to publish London Plan, the applicant has submitted an energy statement, setting out how the development proposes to reduce carbon dioxide emissions. The approach proposed would achieve a 10% carbon dioxide reduction for the domestic element and a 17% reduction for the non-domestic element against 2013 Building Regulations. The carbon dioxide savings for the domestic and non-domestic elements fall short of the target within Policy 5.2 of the London Plan and the Mayor's intend to publish London Plan Policy SI2. To ensure compliance with the London Plan and the Mayor's intend to publish London Plan the applicant must: carry out an overheating analysis; follow the heating hierarchy by providing further information on district heating network connection and the potential for future connection and providing further information on the ambient loop heat pumps; and ensure the provision of PV and provide a detailed roof plan showing this.

Drainage and water

46 The surface water drainage strategy provides an assessment of greenfield runoff rates, existing runoff rates, and attenuation storage required to restrict the 100 year (plus 40% climate change) post-development discharge rate to greenfield rate. The surface water drainage strategy proposes a mix of green roofs, raingardens, permeable paving and attenuation tanks. This represents a good response to London Plan Policy 5.13 and the Mayor's Intend to Publish London Plan Policy SI13 and is supported.

47 The proposed development generally meets the requirements of London Plan Policy 5.15 and the Mayor's Intend to Publish London Plan Policy SI5. The applicant should also consider water harvesting and reuse to reduce consumption of wholesome water across the entire development site. This can be integrated with the surface water drainage system to provide a dual benefit.

Green infrastructure and natural environment

48 London Plan Policy 5.10 and the Mayor's Intend to Publish London Plan Policy G5 state that developments should provide new green infrastructure that contributes to urban greening. Policy G5 also sets out a new Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. Paragraph 170 of the NPPF and the Mayor's Intend to Publish London Plan Policy G6 support the net gain of biodiversity through planning decisions and Policy G6 further states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. London Plan Policy 7.21 and the Mayor's Intend to Publish London Plan Policy G7 seek to protect existing trees of value, which should be retained where possible or otherwise replaced.

49 The proposal includes a variety of new green infrastructure, including a re-provided public garden, as well as extensive podium planting and green roofs. The proposed development presents a well-considered approach to integrating green infrastructure and urban greening. The applicant should provide the UGF score for the development with the aim of meeting the target of 0.4 for predominantly residential developments as set out in the Mayor's Intend to Publish London Plan Policy G5. A drawing showing the surface cover types and accompanying UGF calculation should be submitted.

50 The applicant has identified the need to take measures to protect potential bat roosts within the existing site and measures, including bat boxes and planting for foraging for bats, to provide roosting within the new development. The planning statement refers to

an ecological statement being carried out; however, this is not apparent in the submitted materials and should be provided. This should outline the impacts of development and mitigation for other species as well as bats and measures to provide biodiversity net gain within the proposal in line with the NPPF and the Mayor's Intend to Publish London Plan Policy G6.

51 The Category B group of existing trees identified as G2 on the eastern site boundary are shown for removal to be replaced by a paved area and a small area of planting. The applicant should provide justification for the removal of this tree group given it appears that some of the trees could be restored in this area as part of the proposals. The applicant should consider planting large canopied tree species in the public realm which provide a wider range of benefits because of the larger surface area of their canopy.

Transport

Healthy Streets and the Mayor's Vision Zero Action Plan

52 The applicant is required to demonstrate how the scheme accords with the Mayor's Intend to Publish London Plan Policy T2 on Healthy Streets. The applicant has not undertaken an Active Travel Zone assessment in accordance with the Healthy Streets Transport Assessment guidance. Nevertheless, the applicant has undertaken audits which have assessed the local pedestrian and cycle environments. The applicant must provide further information on what improvements will be secured from these assessments. Furthermore, the applicant must also demonstrate how the proposal will positively contribute towards the Mayor's Vision Zero Action Plan.

Access

53 The existing vehicle access from A404 Hillside will be removed and a new vehicle access from Morland Gardens will be provided. The principle of this is welcomed, subject to a Stage 1 Road Safety Audit. Additionally, it is noted that the new access will necessitate the loss of six on-street car parking spaces on Morland Gardens, which is supported.

54 Refuse collection, deliveries and servicing (for larger vehicles) are proposed via a shared surface loading bay accessed from A404 Hillside. The Mayor's Intend to Publish London Plan Policy T7 requires the provision of adequate space for servicing and deliveries, which should be made off-street, with on-street loading bays only used where this is not possible. The proposed location of the loading bay is in very close proximity to the existing bus stop. Swept path analysis demonstrates that a refuse vehicle would not encroach the bus cage when accessing the loading bay; however, the footway width on the northern side of A404 Hillside would be severely restricted when the loading bay is occupied, creating safety hazards for pedestrians attempting to use the footway or waiting at the bus stop. Therefore, the proposed servicing arrangements raise concerns in terms of compliance with the Mayor's Intend to Publish London Plan Policies T2 and T7 and should be reconsidered.

Car parking

55 The proposal is car-free (with the exception of Blue Badge parking) in accordance with Policy T6.1 of the Intend to Publish London Plan. 7 Blue Badge parking spaces are

proposed, which complies with the requirement for a minimum of 3% provision from the outset and an overall provision of 10% to meet future demand. The provision of 10% from the outset is welcomed.

56 Two car parking spaces are proposed for staff of the further education college. Officers would support the provision of these spaces as Blue Badge car parking for the proposed college and affordable workspace, given that disabled parking is not proposed for these elements of the scheme. Intend to Publish London Plan Policy T6.5 requires all non-residential elements of a development to provide at least one on or off-street disabled parking bay. A Section 106 clause restricting residents from obtaining permits for the local controlled parking zones would be welcomed.

57 The car park should be monitored, managed and enforced through a Parking Design and Management Plan secured by condition. In accordance with the Intend to Publish London Plan, 20% of parking spaces must have an active electric vehicle charging point and at least passive provision is required for the rest; this must be secured by condition.

Cycle parking

58 112 long-stay cycle parking spaces are accommodated at lower ground floor and an additional 26 long-stay spaces are accommodated at upper ground floor. The Mayor's Intend to Publish London Plan requires a minimum provision of 117 long-stay spaces for the residential development, 26 long-stay spaces for the college and 5 long-stay spaces for the affordable workspace. The proposed long-stay provision therefore falls short of the minimum requirements by 10 spaces. In accordance with London Cycling Design Standards (LCDS), 5% of spaces should be wider spaces for non-standard bicycles. Supporting facilities including showers, changing rooms and lockers should be provided where feasible. 36 short-stay cycle parking spaces are provided at the northeast corner of the site within the public realm. This provision would meet the minimum requirements for the proposed college; however, a further provision of 5 visitor spaces is required to serve the residential development and affordable workspace and should include 20% Sheffield stand provision. Therefore, the proposed level of cycle parking should be increased. Further detail is also required on the cycle access routes to parking locations, the type of provision and to confirm compliance with LCDS in line with the Intend to Publish London Plan.

Trip generation impacts

59 With regard to the trip generation and impacts, the proposal will result in a net increase of 113 and 109 two-way person trips in the AM and PM peaks respectively. However, a detailed assessment of impacts on the local public transport network has not been undertaken. This is required and may result in the requirement for a contribution towards enhanced capacity.

Deliveries, servicing, construction logistics and Travel Plans

60 A Construction Logistics Plan (CLP) should be secured by condition. The CLP will need to include co-ordination arrangements with any other developments in the area to ensure management of cumulative impacts. A Delivery and Servicing Plan should be secured by condition and include consideration of management of deliveries to the college,

affordable workspace and residential development. Full Residential and Workplace Travel Plans should be secured through the Section 106 agreement.

Local planning authority's position

61 Brent Council officers are currently reviewing the application. A committee date for the application has not yet been set.

Legal considerations

62 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008, the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purposes of determining the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

63 The Equality Act 2010 provides that in exercising its functions (which includes the functions exercised by the Mayor as Local Planning Authority), that the Mayor as a public authority shall amongst other duties have due regard to the need to a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act; b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it. The protected characteristics set out in the Equality Act are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Equality Act acknowledges that compliance with the duties set out may involve treating some persons more favourably than others, but that this does not permit conduct that would otherwise be prohibited under the Act. Officers will consider the applicant's response to access to the multi-faith rooms and potential transport impacts on nearby churches in terms of the development's potential impact on the practice of religion or belief. Other matters of consideration where equality issues may arise include the provision of accessible housing and parking bays, the provision of accessible cycle parking, the provision of affordable and family housing, the provision of replacement and new social infrastructure, and the protection of neighbouring residential amenity.

Financial considerations

64 There are no financial considerations at this stage.

Conclusion

65 London Plan and the Mayor's Intend to Publish London Plan policies on educational facilities; affordable workspace; housing; affordable housing; social infrastructure; design; heritage; inclusive design; energy; water and drainage; urban greening and biodiversity;

and transport are relevant to this application. Having regard to these policies the application complies with some of these policies but not with others as per the schedule below:

- **Principle of development:** The proposed residential-led mixed use development is strongly supported in principle. The replacement further education facility is strongly supported, subject to measures to ensure continued operation. Further information on the provision of the affordable workspace is required.
- **Housing:** 100% affordable housing, all of which would be social rented, is strongly supported and eligible for the Fast Track Route. A contribution towards off-site play space must be secured.
- **Urban design:** The proposed density, height and massing, and architecture are supported. The applicant should demonstrate that the public realm can accommodate the entry, egress and emergency assembly of students safely. The impacts of noise from the development on neighbouring and on site residential uses should be considered and mitigation measures proposed. The applicant should provide a fire evacuation lift within each building core.
- **Heritage:** The loss of the locally listed building is acceptable given the overall scheme benefits.
- **Inclusive design:** The Council should secure M4(2) and M4(3) requirements by condition as part of any permission. The applicant should clarify how wheelchair users would access the multi-faith rooms.
- **Sustainable infrastructure:** The Air Quality Neutral assessment must assess both building and transport emissions for all proposed land use classes and details of a mitigation scheme provided. The impacts of the proposed gas-fired boilers on existing off-site receptors and proposed on-site receptors should be assessed. The applicant should provide further information on overheating, district heating connection and future-proofing and photovoltaics. The proposed development generally meets London Plan and the Mayor's Intend to Publish London Plan policies on drainage and water infrastructure.
- **Green infrastructure and natural environment:** The extensive area of urban greening is strongly supported. The applicant should provide the UGF for the development with the aim of meeting the target of 0.4 for residential developments as set out in the Mayor's Intend to Publish London Plan Policy G5. The applicant should provide further information on biodiversity mitigation and net gain and should consider retaining some of the existing trees.
- **Transport:** Further information on how the scheme accords with the ten Healthy Streets indicators is required. The proposed servicing arrangements should be reconsidered. The level of cycle parking should be increased and meet London Cycling Design Standards. A Construction Logistics Plan and Delivery and Servicing Plan should be secured by condition; Travel Plans should be secured in the S106 agreement.

for further information, contact GLA Planning Unit:
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This response reflects the views of the GLA case officer and is without prejudice to the Mayor's decision at Stage 2.

Stage 1 matter	Detail	GLA response to applicant comments
Principle of development	The facilities would include a cafe open to the public; the applicant is encouraged to consider whether any other facilities could be used by community groups and the Council should secure a community use agreement for this.	No response. Please confirm if this will/will not be provided for within the S106 agreement. GLA officers request sight of the S106 agreement before a Stage 2 referral is made.
	the applicant has not provided any information on the affordable workspace in terms of planning policy. The applicant should clarify which sectors the affordable workspace is intended to support and how it addresses identified cost pressures or sustains a mix of business or cultural needs, with reference to the adopted and draft Brent Local Plan, the London Plan and the Mayor's Intend to Publish London Plan.	Response should be provided
	The rent levels and management arrangements for the affordable workspace should be secured within the S106 agreement.	No response. Please confirm that this will be provided for within the S106 agreement. GLA officers request sight of the S106 agreement before a Stage 2 referral is made.
Housing and affordable housing	The rent levels for the social rent units must be secured within the S106 agreement.	To be provided in S106 agreement. GLA officers request sight of the S106 agreement before a Stage 2 referral is made.
	The applicant has identified play space at Lawrence Avenue within 400 metres of the site but this is not dedicated play space for children aged between 5-11 years. The applicant has identified play space for children aged 12+ years old at Stonebridge Recreation Ground around 400 metres away and at Paulet Way and Gibbons Recreation Ground, both within 800 metres of the site, which is acceptable. The applicant has acknowledged the lack of dedicated play space for 5-11 year olds and is willing to make a financial	To be provided in S106 agreement. GLA officers request sight of the S106 agreement before a Stage 2 referral is made.

Stage 1 matter	Detail	GLA response to applicant comments
	contribution towards off-site play space. This is welcomed and would address the deficiency of on-site play space and should be secured within the S106 agreement.	
Urban design	This space is stated to be the same size as existing, although it appears narrower than before. Officers are therefore concerned that the space is insufficient to accommodate the number of students using the college safely, with the potential for students to spill out onto the road, creating conflict between pedestrians and vehicles. The applicant should clarify how many students would be using the college and demonstrate that the public realm in this area is sufficient to allow for the safe entry, egress and emergency assembly of students from the development. The applicant should set back the building line further into the site if the space is insufficiently large. The applicant should also consider retaining some of the existing trees in this area.	Designed for use by up to 250 students, with 50 staff and 40 guest users. Average use will be 200 people in the mornings and afternoons, with evening classes for 60 students. This space is now considered to be sufficient to accommodate the number of people within the building. The applicant should confirm that the use of this space for emergency assembly would not prejudice the use of Morland Gardens for access by emergency vehicles.
	The Council should secure details of facing materials and building details such as roof lines at by condition to ensure a high quality of materials and architecture is secured.	To be provided by condition. No further comments.
	The submitted noise assessment only considers the impact of noise on the development; the applicant should consider the impacts of noise from the development on neighbouring and on site residential uses and propose appropriate mitigation measures.	The noise assessment appropriately considers the impact of from plant noise, vehicles and occupants, including the students, on surrounding sensitive receptors. The noise from plant and vehicles is agreed to be acceptable. The applicant should clarify the existing number of students at the further education centre so that officers can verify the assertion that the impact of student noise is not significant. No further comments.
	Unit 02-08 has 0.5 sq.m. and unit 03-04 has 1.8 sq.m. less private amenity space than required; the applicant should	It is noted that the outdoor amenity spaces were undersized mistakenly and officers are satisfied that this

Stage 1 matter	Detail	GLA response to applicant comments
	<p>increase the provision of this amenity space and demonstrate that the spaces are practical in terms of shape and utility. 75.4% of the units would be dual aspect and there are no north-facing single aspect units, which is supported.</p> <p>The applicant should consider how future modifications to the building will not compromise the base build fire safety and protection measures. The applicant should also provide a fire evacuation lift within each building core for the evacuation of wheelchair users and other less mobile occupants.</p>	<p>has been addressed. The 0.15 sq.m. shortfall on Unit 02-08 is negligible and acceptable. No further comments.</p> <p>The plans now show provision of a fire evacuation lift. However, this is referred to in documents as a firefighting lift. These two terms are not synonymous and the fire strategy should be updated to clarify that this is a fire evacuation lift. The remaining fire statement point has not been addressed.</p> <p>This matter is not resolved.</p>
Heritage	All matters resolved	No heritage concerns raised at Stage 1. No further comments.
Inclusive design	<p>It is not clear how wheelchair users can access the multi-faith rooms; a lift is shown between lower ground and upper ground floors and the applicant should clarify if this is for general use. The further education college would be located entirely on one level (with the exception of the multi-faith rooms), which avoids barriers to access and is strongly supported.</p> <p>The remainder of the non-residential development could also achieve the highest standards of accessible and inclusive design, subject to addressing the lack of inclusive cycle parking as detailed in the transport section. The Council should secure M4(2) and M4(3) requirements by condition.</p>	<p>The applicant has clarified that the lift to the lower ground floor will be a passenger lift. As such, officers consider that level access has been provided. No further comments.</p> <p>To be secured by condition. No further comments.</p>

Stage 1 matter	Detail	GLA response to applicant comments
Air quality	<p>The Air Quality Neutral assessment must assess both building and transport emissions for all proposed land use classes. A scheme of mitigation should be proposed to address any exceedances of the Air Quality Neutral benchmarks. The reduction in car parking compared to existing uses is, however, welcomed.</p> <p>The impacts of the proposed gas-fired boilers on existing off-site receptors and proposed on-site receptors should be assessed using dispersion modelling should emissions exceed the IAQM/EPUK screening criteria. The applicant must submit details of a mitigation scheme to ensure future occupants are exposed to acceptable air quality.</p>	Response should be provided
Energy	<p>the applicant must: carry out an overheating analysis; follow the heating hierarchy by providing further information on district heating network connection and the potential for future connection and providing further information on the ambient loop heat pumps; and ensure the provision of PV and provide a detailed roof plan showing this.</p>	See separate energy response
Urban Greening	<p>The applicant should provide the UGF score for the development with the aim of meeting the target of 0.4 for predominantly residential developments as set out in the Mayor's Intend to Publish London Plan Policy G5. A drawing showing the surface cover types and accompanying UGF calculation should be submitted.</p>	<p>The applicant has calculated the UGF of the proposed development as 0.2, which falls quite short of the target of 0.4 for predominately residential development. The applicant should therefore seek to improve the quantity and quality of urban greening across the site. One key area that should be explored is the extent of green roofs as it appears there is the opportunity to substantially increase the green roof coverage. At the same time the specification of the green roofs should be reviewed and the applicant should look to provide intensive green roofs</p>

Stage 1 matter	Detail	GLA response to applicant comments
		with a minimum substrate settled depth of 150mm, which offer substantially greater benefits than sedum mats. This matter is not resolved.
	an ecological statement being carried out; however, this is not apparent in the submitted materials and should be provided. This should outline the impacts of development and mitigation for other species as well as bats and measures to provide biodiversity net gain within the proposal in line with the NPPF and the Mayor's Intend to Publish London Plan Policy G6	Response should be provided
	The applicant should provide justification for the removal of this tree group given it appears that some of the trees could be restored in this area as part of the proposals. The applicant should consider planting large canopied tree species in the public realm which provide a wider range of benefits because of the larger surface area of their canopy	The trees are noted to be interconnected and restoring some of the trees would be difficult and the resulting appearance asymmetric. No further comments.
Transport	Nevertheless, the applicant has undertaken audits which have assessed the local pedestrian and cycle environments. The applicant must provide further information on what improvements will be secured from these assessments. Furthermore, the applicant must also demonstrate how the proposal will positively contribute towards the Mayor's Vision Zero Action Plan.	Response should be provided
	Therefore, the proposed servicing arrangements raise concerns in terms of compliance with the Mayor's Intend to Publish London Plan Policies T2 and T7 and should be reconsidered.	TfL welcome the removal of the proposed loading bay from A404 Hillside, and the new location of servicing / deliveries via Morland Gardens. However, the revised layout for the college short-stay cycle parking (Area A) should be shown on the swept path analysis drawings for the proposed loading bay. Subject to this, the revised

Stage 1 matter	Detail	GLA response to applicant comments
		servicing arrangements undertaken via Morland Gardens are considered safe in terms of ItP London Plan Policies T2 (Healthy Streets) and T7. This matter is not yet resolved.
	Officers would support the provision of these spaces as Blue Badge car parking for the proposed college and affordable workspace, given that disabled parking is not proposed for these elements of the scheme. Intend to Publish London Plan Policy T6.5 requires all non-residential elements of a development to provide at least one on or off-street disabled parking bay.	Response should be provided
	A Section 106 clause restricting residents from obtaining permits for the local controlled parking zones would be welcomed.	To be provided in S106 agreement. GLA officers request sight of the S106 agreement before a Stage 2 referral is made.
	In accordance with the Intend to Publish London Plan, 20% of parking spaces must have an active electric vehicle charging point and at least passive provision is required for the rest; this must be secured by condition.	To be secured by condition. No further comments.
	The proposed long-stay provision therefore falls short of the minimum requirements by 10 spaces. In accordance with London Cycling Design Standards (LCDS), 5% of spaces should be wider spaces for non-standard bicycles. Supporting facilities including showers, changing rooms and lockers should be provided where feasible.	The level of cycle parking provision for each element of the proposal now accords with the ItP London Plan minimum standards. It is welcomed that access routes to cycle parking locations have been shown on plan.
	however, a further provision of 5 visitor spaces is required to serve the residential development and affordable workspace and should include 20% Sheffield stand provision.	The qualitative improvements made to the cycle parking are welcomed. Access aisles have been increased in width (in compliance with the LCDS requirements) and some provision for non-standard cycles has been made.

Stage 1 matter	Detail	GLA response to applicant comments
	Further detail is also required on the cycle access routes to parking locations, the type of provision and to confirm compliance with LCDS in line with the Intend to Publish London Plan.	Individual showers / changing facilities have been identified for staff of the development, and the provision meets the recommended level of at least one shower per ten long-stay cycle parking spaces.
	Further detail is also required on the cycle access routes to parking locations, the type of provision and to confirm compliance with LCDS in line with the Intend to Publish London Plan.	No further comments.
	However, a detailed assessment of impacts on the local public transport network has not been undertaken. This is required and may result in the requirement for a contribution towards enhanced capacity.	The applicant has provided a public transport impact assessment as requested. Based on the anticipated additional bus trips, of 55 and 59 trips during the AM peak and PM peak respectively, a contribution of £383,500 is sought from the developer towards the development of the local bus network. This figure has been determined by applying the worst case peak hour bus trip generation to the maximum capacity of a double-decker bus (75 passengers). This proportion has then be applied to the cost of an additional bus over a 5-year period (£487,500). GLA officers request sight of the S106 agreement before a Stage 2 referral is made.
	A Construction Logistics Plan (CLP) should be secured by condition. The CLP will need to include co-ordination arrangements with any other developments in the area to ensure management of cumulative impacts. A Delivery and Servicing Plan should be secured by condition and include consideration of management of deliveries to the college, affordable workspace and residential development.	To be secured by condition. No further comments.

Stage 1 matter	Detail	GLA response to applicant comments
	Full Residential and Workplace Travel Plans should be secured through the Section 106 agreement.	To be provided in S106 agreement. GLA officers request sight of the S106 agreement before a Stage 2 referral is made.

22nd January 2019

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Dear [REDACTED]

Morland Gardens Planning Application (PP-08024681)

We write on behalf of the London Borough of Brent as applicants to submit the planning application for Morland Gardens. Full planning permission is sought, and the description of development is as follows:

'Demolition of a series of existing buildings, erection of a new mixed use building ranging in height from two to nine storeys, to provide 65 dwellings (use class C3), 750 sqm of affordable workspace (use class B1), 2,650 sqm new further education college (Class D1), with associated amenity areas, public realm improvements, car and cycle parking and refuse/recycling stores'.

The planning application is supported by the following documents:

1. Application Form
2. CIL Form
3. Covering Letter
4. Architectural plans:
 - a. Location Plan:
 - i. 01008-CLTH-XX-ZZ-DR-A-1000-ExistingLocationPlan1to1250
 - b. Block Plan:
 - i. 01008-CLTH-XX-ZZ-DR-A-1001-ExistingSitePlan1to500
 - c. Existing Site Sections:
 - i. 01008-CLTH-XX-ZZ-DR-A-1108-ExistingSections
 - d. Existing Site Elevations:
 - i. 01008-CLTH-XX-ZZ-DR-A-1107-ExistingEastAndWestElevations1to200
 - e. All other Architectural Drawings:
 - i. Please see: 01008-MorlandGardens-CLTH-DrawingRegister-200110
5. Design and Access Statement:
 - a. 220120-01008-MorlandGardens-DAS (submitted by electronic transfer)
6. Planning Statement:
 - a. MG00 5740 Morland Gardens Planning statement 22-01-2020 FINAL (submitted by electronic transfer)

7. Landscape Design and Access Statement:
 - a. 2092-PLA-RP-L-0001-01-Morland Gardens-Design and Access Statement (submitted by electronic transfer)
 - b. 2092-PLA-XX-01-DR-L-0102-Level 1 Residential Gardens Plan
 - c. 2092-PLA-XX-06-DR-L-0103-Level 6 Rooftop Garden Plan
 - d. 2092-PLA-XX-GF-DR-L-0101-Ground Floor Landscape Plan
 - e. 2092-PLA-XX-ZZ-DR-L-0100-Landscape Masterplan
 - f. 2092-PLA-XX-ZZ-DR-L-0104-Rooftops Plan
8. Historic Building Assessment:
 - a. MG03 1 Morland Gardens Historic Building Assessment
9. Preliminary Ecological Assessment, including Bat Surveys:
 - a. RT-MME-129781-04 (PRA)
 - b. rtmme130307-01
10. Drainage Strategy:
 - a. 28058 PM Drainage Strategy Ver 01 – Appendices (submitted by electronic transfer)
 - b. 28058 PM Document Issue Record
 - c. 28058 PM Drainage Strategy Ver 01
 - d. 28058-6000_1
 - e. 28058-6001_1
 - f. 28058-6003_1
 - g. 28058-6100_1
 - h. 28058-6101_1
11. Foul Sewage and Utilities Assessment:
 - a. SOR014706
12. Daylight/Sunlight Assessment (internal):
 - a. Daylight and Sunlight Study (Within) 200120
13. Daylight/Sunlight Assessment (neighbouring properties)
 - a. Daylight and Sunlight Study (No CC) 170120
14. Arboricultural Survey and Report:
 - a. RT-MME-129781-01 (PAA)
 - b. RT-MME-129781-02 (AIA) (submitted by electronic transfer)
 - c. RT-MME-130722 AMS (submitted by electronic transfer)
 - d. TRUK 0002 Moorland Gardens TreeRadar Rev A (submitted by electronic transfer)
15. Ground Conditions Report:
 - a. 10363A Morland Gardens - GMA report (Rev1_Final_19_08_19) (submitted by electronic transfer)
16. Basement Impact Assessment:
 - a. 00878_Morland Gdns_Stage 3a_Structural Statement X2 (submitted by electronic transfer)
 - b. 10363 Morland Gardens - GIR (Rev2_Final_23_08_19) (submitted by electronic transfer)
 - c. Document Issue Sheet
17. Air Quality Assessment, including Air Quality Neutral Assessment:
 - a. MG01 AQ1532 Morland Gardens Air Quality Assessment v2
18. Energy Statement:
 - a. J6576_Morland Gardens_Energy, Sustainability & BREEAM Assessment - Final
19. Lighting Assessment:

- a. *External Lighting Assessment for Planning 2 (submitted by electronic transfer)*
 - b. *SK-V41-000*
 - c. *SK-V41-001*
- 20. Noise and Vibration Assessment:
 - a. *1700209-RP-NIA-0001.4-17012020.KD (submitted by electronic transfer)*
- 21. Transport Statement and Travel Plan:
 - a. *Appendix D-F*
 - b. *R01-DSS-PERS Audit (Appendix B)_Part 1 (submitted by electronic transfer)*
 - c. *R01-DSS-PERS Audit (Appendix B)_Part 2*
 - d. *R02-YA-Cycling Level of Service Audit (Appendix C)*
 - e. *R03-YA-Transport Statement -Appendix A*
 - f. *R04-YA- Residential Travel Plan 190910*
 - g. *R05-YA-Work Place Travel Plan 190910*
- 22. Fire Strategy:
 - a. *190822 Morland Gardens Stage 3 Outline Fire Strategy Report with App A spliced (submitted by electronic transfer)*
- 23. Wind Microclimate Assessment:
 - a. *190906 RWDI Project 1903642 Morland Gardens - Pedestrian Winds Assessment Final Report*

We trust you have sufficient information to register and validate the application but should you have any queries at this stage please do not hesitate to contact me at this office.

Yours sincerely

For Tibbalds Planning and Urban Design



Senior Planner



enc

cc

An architectural rendering of a modern, multi-story residential building. The building features a curved facade with a grid of windows and balconies. The balconies have metal railings and some have small planters. The ground floor has large glass windows and a central entrance labeled 'STONEBRIDGE CENTRE'. There are trees and landscaping in front of the building, including a large tree with pink blossoms. The sky is clear and blue.


Morland Gardens

Planning Statement

January 2020

Tibbalds

planning and urban design

Quality Assurance	
Project title	Morland Gardens
Document title	Morland Gardens Planning Statement
Client	
Checked by Project Runner	
Approved by Project Director	
Project number	5740
Location of file on server	TPUD - Main/Job Server/5740 Morland Gardens/5740 4.0 Design Work/5740 4.4 Reports & Output/5740 4.4 indd

Revision History		
Revision	Date	Status
1	28-08-2019	DRAFT
2	03-10-2019	DRAFT
3	21-02-2020	FINAL

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1. Introduction

This Planning Statement has been prepared on behalf of the London Borough of Brent as the applicant in support of a full planning application which is submitted to the London Borough of Brent as the local planning authority.

The application site ('the site' or '1 Morland Gardens' or 'the Stonebridge Centre') is made up of a series of buildings of different ages, with a Victorian core that has been extended and altered many times since it was built in the 1880s. The building is currently occupied by the Brent Adult and Community Education Service and Victim Support. The existing building is unfit for purpose due to poor accessibility and limited opportunities to extend the premises to meet modern requirements.

In light of these restrictions, the applicant is proposing to demolish the current building and replace it with the following:

- 65 new homes at a range of sizes, 100% of which will be affordable.
- 2,650 sqm GIA of new learning space for the Further Education College
- 750 sqm of affordable workspace

The description of development is:

'Demolition of a series of existing buildings, erection of a new mixed use building ranging in height from two to nine storeys, to provide 65 dwellings (use class C3), 750 sqm of affordable workspace (use class B1), 2,650 sqm new further education college (Class D1), with associated amenity areas, public realm improvements, car and cycle parking and refuse/recycling stores'.

The format of the application and supporting technical documents was agreed with officers during the pre-application stage. This Planning Statement describes the site, the proposed development, planning context and assesses the development against relevant planning policy.

The application is supported by the following documents:

- i. Application form and Ownership Certificates
- ii. CIL form
- iii. Architecture plans, including:
 - a. Location plan
 - b. Block plan

- c. Existing site sections
- d. Proposed site sections
- e. Proposed floor plans
- f. Proposed elevations
- g. Proposed sections
- iv. Design and Access Statement
- v. Planning Statement
- vi. Landscape Design and Access Statement
- vii. Historic Building Assessment
- viii. Preliminary Ecological Assessment, including Bat Surveys
- ix. Drainage Strategy
- x. Foul Sewage and Utilities Assessment
- xi. Daylight/Sunlight Assessment (internal)
- xii. Daylight/Sunlight Assessment (neighbouring properties)
- xiii. Arboricultural Survey and Report
- xiv. Ground Conditions Report
- xv. Basement Impact Assessment
- xvi. Air Quality Assessment, including Air Quality Neutral Assessment
- xvii. Energy Statement
- xviii. Lighting Assessment
- xix. Noise and Vibration Assessment
- xx. Transport Statement and Travel Plan
- xxi. Fire Strategy
- xxii. Wind Microclimate Assessment

■ 2. The site, location and context

The entire 1 Morland Gardens site is within Brent Council's ownership. The site is located in the south of the London Borough of Brent, and sits in the north-west corner of the crossroads of the A404 Hillside, and Brentfield Road. The site is 10 minutes' walk north-west from Harlesden High Street.

The Stonebridge area is predominantly residential, with architectural styles ranging from Victorian terraces to the east, post-war apartment blocks to the north, and more modern developments further west along Hillside.

The original building has a similar historic value to the proposal site, however it has since had a number of insensitive extensions added. The property at No.2 Morland Gardens neighbours the site to the north. To the west of the site is 1-7 Hillside, an apartment block completed in 2009, which connects to the Brent Hub Community Enterprise Centre. The remaining sides are bounded by two main roads (A404 Hillside and Brentfield Road). Across the road, directly south of the site is St Michael & All Angels Church, a late nineteenth century church well-used by the local community.

The existing building is set back from the main road, behind an area of planting, and a car park that wraps around the perimeter of the building. A community garden is located on the eastern edge of the site. The site is highly accessible, with an excellent public transport accessibility level (PTAL) of 4. The nearest station is Harlesden Overground station, which is 10 minutes' walk south of the site, and Stonebridge Park underground station which is only 20 minutes' walk. There are a number of bus stops nearby providing routes into Euston, and across to Kilburn.

■ 3. Pre-application Engagement

The proposals have been developed in consultation with the LB Brent planning team over a series of PPA meetings. At the initial meetings the general development strategy was discussed, with subsequent meetings focussing on specific key elements of the design, especially heritage, residential amenity, daylight, sunlight and height.

■ PPA 01 - 08/03/2019:

- Introduction to the project and the strategic brief.
- Client explained that discussions with neighbours were to take place to finalise consultation with all key stakeholders
- Discussions focused on the key material considerations, including separation distances and sunlight/daylight, and the need to comply with policy.
- Discussion surrounding building height highlighted that a tall building could be justified in order to include education space, affordable workspace, and outstanding design quality.
- Amenity space for residents would be prioritised, and requirements would meet London Plan policy.
- Further engagement with Heritage Officer required to discuss loss of locally listed villa.
- The council were supportive of the tenure mix and split

■ PPA 02 – 24/03/2019:

- Further discussion around the retention of the locally listed villa - two options to be explored: 1) retention of core parts of the villa, 2) removal of the villa as part of a new build scheme.
- Architect's to adjust massing to ensure compliance with SPD 1 with regard to sunlight/daylight.
- Agreement that as the building is now proposed to be over 30m, it will be referred to the GLA,.
- The council stated that 0-4 age group play space should be provided on-site, but that older age group play space could be provided in local parks within 400m

■ PPA 03 – 06/06/2019:

- Architects agreed to revisit the sunlight/daylight modelling to reduce impact on neighbouring amenity by applying policy from SPD 1.

- The council approved of the materials suggested, but highlighted that the quality of these materials would be critical to the success of the project.

■ PPA 04 - 12/07/2019

- The position and orientation of the proposal was adjusted to improve the sunlight/daylight credentials of the scheme.
- The GLA have updated their play space calculator, and this will need to be acknowledged in the proposal.
- Details around refuse collection still need to be discussed with the highways team.
- No further PPA meetings required.

Please see the Design and Access Statement for details of design development and details of public engagement.

■ 4. Development Plan and Planning Considerations

The Development Plan

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

The Development Plan for the site consists of the following planning policy documents:

London

The London Plan (Draft) (December 2017) ('DLP')

London Borough of Brent

Core Strategy (July 2010) ('CS')

Development Management Policies (November 2016) ('DMP')

Brent Design Guide (SPD1) (November 2018) ('SPD1')

Basements SPD (June 2017)

National

The National Planning Policy Framework (February 2019) ('NPPF') is also a material consideration.

5. Planning Policy Assessment

Through the design and development process the Applicant and their design team have sought to deliver a high-quality response that strikes an appropriate balance between the site constraints and planning policy considerations.

The following topics cover the key material planning considerations raised by the proposed scheme.

- 5.1. Heritage
- 5. 2. Sunlight and Daylight
- 5. 3. Separation distances and residential amenity
- 5. 4. Building height
- 5. 5. Trees
- 5. 6. Unit mix
- 5. 7. Tenure split
- 5. 8. Parking
- 5. 9. Access
- 5. 10. Waste and refuse
- 5. 11. Energy
- 5. 12. Air Quality
- 5. 13. Amenity space
- 5. 14. Play space

The following section demonstrates how the scheme has been designed in response to site constraints, policy requirements and PPA feedback.

5.1 Heritage

The London Borough of Brent has published a schedule of locally listed buildings which identifies non-designated heritage assets in the Borough. This list includes the Stonebridge Centre (1 Morland Gardens, ref. 004). Buildings and structures included on this list are considered to be of good quality design or to have historical significance, however they are not statutory listed on the National Heritage List for England. This means that the Stonebridge Centre isn't granted the same level of protection that listed building status would afford, but the Council will take the building's historic significance into account when determining a planning application that affects it. For the purpose of this application we consider that the significant element of the building is the older part dating from the 1880's ('the historic core') and not the modern expansion covering the north west portion of the site.

The design team have carefully considered a wide range of development options for the application site, including options that retain the historic core of the building, but have determined that it is not viable to retain it. This application is therefore proposing to demolish all of the existing buildings on the site and replace them with new build. This iterative design process has been set out in detail in Appendix A of the submitted Design and Access Statement, and helped the design team reach this conclusion. We consider this approach to be supportable for the following reasons.

1. The existing building has been subject to numerous incremental changes since it was originally built, including several modern extensions and modifications to room layouts. Whilst much of the Victorian exterior of the historic core remains intact, the interior has been extensively modified, resulting in many of the original features being lost. This has degraded the historical significance of the building and there are many other better examples of Victorian mansion blocks in the Borough and London as a whole. The submitted Historic Building assessment catalogues the building in detail and supports this position.
2. The existing building is not fit for purpose since it was not originally constructed for education purposes. There is a recognised need in the Borough for new adult education facilities and the structure of a Victorian house is not

suitable for modern educational needs. The proposed adult education centre will be over a single storey to allow for better access for people with disabilities, something that is impossible to provide for with the current structure. The Victorian structure can also not physically accommodate modern classrooms and the facilities that they require, with the proposed facility providing a significant uplift in floor space.

3. Retaining the existing building results in significantly less educational floorspace and affordable housing provision. At the beginning of the design process many options were explored to retain the historic core of the building and construct around it, but this resulted in a significantly smaller adult education facility and less housing.
4. The proposed building will positively contribute to the character of the area. Presently the frontage along the A404 is weak, with the buildings set back from the road and the junction to the south-east. Coupled with the broad and busy roads to the south and east, the result is an uninviting public realm. Bringing the proposed buildings closer to the road and increasing the height on the corner of the A404 and Brentfield Road will result in a much stronger frontage and a prominent building appropriate for the location.
5. Care has been taken to integrate the proposed building into the existing townscape. The proposed building is fundamentally inspired by the Italianate design of the existing house. These include the use of arched window heads across the proposed scheme; the buff-coloured cladding which reflects the original brickwork and the relief panels of the proposed facades that respond to the refined brick textures of the existing structure. Design inspiration has also been taken from the surrounding buildings, including St Michaels church to the south and the Five Precious Wounds church to the north. The use of light terracotta coloured glass reinforced concrete (GRC) for the facade reflects the red brick used in the nearby churches. These panels will be embossed with decorative patterns that have been inspired by the traditional brick arches of the existing building on site. The design of these patterns has not yet been fully developed, however the applicant would be happy to accept securing the quality of facade materials through

a condition. This will guarantee the delivery of a high-quality facade.

Overall we consider the proposals to accord with planning policy. As the submitted documents demonstrate, the many incremental internal and external changes to 1 Morland Gardens have eroded the historical significance of the building, which is reflected in the non-statutory listing. Options to preserve the remaining historic elements have been carefully considered from the beginning of the design process, informed by detailed survey work to build a clear understanding of the historic elements of the building in the context. On balance, the design team concluded that the minimal significance of the historic core is outweighed by the need for new education facilities and housing in the Borough.

We therefore consider the proposals to conform with London Plan Policy HC1 and Policy DMP 7.

5.2 Sunlight and Daylight

The daylight and sunlight impact on neighbouring properties and within the proposed development are central to the submitted designs, with several rounds of testing and pre-application discussions taking place to develop a supportable scheme.

Neighbouring Properties

This iterative design process has resulted in the following design elements to minimise the impact on neighbouring properties at 2 to 8 & 21 Hillside, Stonebridge Evangelical Church, St Michaels and All Angels C of E Church, The Five Precious Wounds RC Church, 2 Morland Gardens and 34 Craven Park. The application is supported by a full daylight and sunlight study for neighbouring properties, which sets out the results in full.

The massing of the proposed building has been carefully designed to minimise the impact on neighbouring properties. For example, the tallest elements of the scheme are pushed to the north of the site away from the three storey houses on Morland Gardens. The two blocks which comprise the majority of the residential accommodation also vary in height from 5 to 9 storeys, stepping down to limit impact on the properties to the west and stepping up to the prominent urban corner of Hillside and Brentfield Road.

The proposal was developed through detailed discussions between the design team and planning officers, and in order to further reduce the impact of the scheme, the proposed building was shifted 2m south and 2m east in order to increase separation distances from neighbouring properties. In addition, the entire western block was redesigned, with a significant reduction of height and volume to the north west corner of the scheme, allowing improved light transmission to the windows of 2-8 Hillside. This west block was also angled to allow light into the gardens and rear windows of 2 Morland Gardens.

The result of these incremental changes is a high level of compliance with BRE guidance, with 93% of neighbouring windows passing. In evaluating these results, it should also be noted that the site is in a relatively dense urban context and can be considered under-developed at present. In such a context, the BRE guidance is normally applied flexibly and we would therefore consider the development to be in a very supportable position. Finally, it is significant that the windows at 2 Morland Gardens which do not meet standards fail due to their unusually close proximity to the site boundary.

Please see the submitted neighbouring properties sunlight and daylight report for a full appraisal of the scheme.

Internal Results

The submitted internal daylight and sunlight report demonstrates that the proposed scheme secures a high level of compliance with the BRE guidance. The scheme has been designed so that 100% of the flats are dual aspect and will have acceptable levels of daylight and sunlight year round.

The central courtyard garden (Garden 1) fails to meet BRE guidance for sunlight on 21st March, however the remaining amenity space meets guidance and we consider this to be an acceptable approach given the structure of the proposed building and the urban nature of the site. Securing compliance for garden 1 would result in a loss of residential units and we consider the excellent internal results to be more pertinent at this time of the year.

Please see the submitted internal sunlight and daylight report for a full appraisal of the scheme.

We therefore consider the proposals to accord with the new London Plan Policy D4.

5.3 Separation Distances and Residential Amenity

Policy 5.1 of the Brent Design Guide SPD1 requires that directly facing habitable rooms should have a minimum separation distance of at least 18m, except where the existing character of the area does not encourage this. Careful consideration has been given to the massing and layout of the proposed development to ensure adequate amenity and privacy for new residents and protect that of existing residents to ensure compliance with policy, especially where the separation distances to neighbouring properties are minimal.

The residential apartment block at 1-7 Hillside has a number of windows facing the site, however the proposed development will be at an appropriate separation distance of 18m from this block. Additionally, the tallest element of the proposed West residential block has been placed to the South of the site opposite the stair core of 1-7 Hillside, and one dual aspect apartment, which is primarily oriented away from the proposal (facing southwards over Hillside Road).

As previously mentioned in Section 5.2, 2 Morland Gardens, the residential block directly to the north of the site, is located very close to the property boundary. The separation distance to the proposed building ranges from 10 to 15m, as the buildings do not face each other directly. In order to address this separation distance, all units to the northern face of the building are dual aspect and predominantly face towards the South. The remaining windows that face 2 Morland Gardens will be small in size and angled to screen views and preserve the existing residential amenity. It should also be noted that the adjacent windows in 2 Morland Gardens are to secondary flank elevations, and there are numerous instances in the local area among the semi-detached houses on Craven Park and Bruce Road where flank elevations to 3 storey buildings contain small windows that are less than 10m distance from each other. Therefore the proposed treatment of this boundary is consistent with the character of the local area.

The Brent Design Guide SPD 1 states that the '30 degree rule' and '45 degree rule' should be employed, which requires the building envelope to be set below a line of 30 degrees from the nearest habitable room window of adjoining existing properties, or 45 degrees where the

proposal would overlook a garden/private amenity space. This is relevant when assessing the proposed building's relationship with 2 Morland Gardens, however when applying the 'mirror test', this allows for the volume of the west block and northern maisonettes to be slightly increased. It is considered that the amenity space at No. 2 Morland Gardens that will be affected by this slight increase in height is exempt from the '45 degrees' rule as the flat is served by additional areas of amenity to both the front and back of the property.

Overall, the residential area of the scheme will achieve appropriate internal ambient noise levels specified in BS8233 as long as the specification of façade elements, such as attenuated wall ventilators, are provided. Windows will have to remain closed to maintain appropriate internal noise levels, however, overheating mitigation methods will be provided by a mixture of mechanical and natural ventilation strategies. As the windows must remain closed in the educational area to meet the required internal ambient noise levels, a mixture of natural and mechanical background ventilation strategies will also be employed here. Mechanical cooling and ventilation will be used on the southern side of the building where the windows are able to remain closed. In the northern half of the building, internal levels can be achieved during normal ventilation conditions with operable windows or other natural ventilation openings.

All residential units will be dual aspect and comply with the London Plans standard for private residential amenity.

5.4 Building height

The proposed massing and height of the building has been developed in consultation with LB Brent through the pre-application PPA process and in consultation with sunlight and daylight specialists. The result is a development height of between 2 and 9 storeys.

This height is based on precedent set by the heights of other building in the immediate vicinity, which also range from 5 to 9 storeys and developed based on a 5-storey datum for the site. From this datum, the massing has been adjusted to allow light deeper into the block, and reduce over-bearing on the surrounding buildings. The two storey maisonettes at the edges of the block represent the lowest residential development height, and allow light into the central

courtyard. The western block height has been adjusted to seven storeys in total, reducing the effects on neighbouring residential amenity.

The site location on the corner of a prominent crossroads justifies the increased height of the eastern block to nine storeys. We consider the proposed height and massing of the building to respond positively to existing context and character of the area, and respect human scale.

We therefore consider the proposals to be in accordance with the London Plan and principle 3.1b of the Urban Design Compendium

5.5 Trees and Green Spaces

There will be 39 category B trees and a single Category U Tree removed in to accommodate the proposed development.

Across the site, the proposal is for a development set in an attractive and memorable setting which sensitively integrates into the wider landscape. A range of landscaped areas will be provided across the development, including a community garden, and green and biodiverse roofs. At street level, the arrival garden will feature new planting and trees, and retain the existing London Plane Tree. These features will act as a buffer to Brentfield Road, provide a comfortable environment for people to enjoy, as well as help to capture and filter stormwater runoff. Along the southern boundary against Hillside, deciduous trees will mark each end of the building. In the Sky Garden, deciduous tree planting will provide some sun protection and privacy to residents at this level.

Across the rest of the development, and on the rooftops, 38 multistem trees are proposed, which will result in a significant uplift in the quality of trees on the site.

5.6 Unit mix

The proposed development will provide 65 new dwellings, with the following unit mix:

- 40% 1 bed dwellings
- 18% 2 bed dwellings
- 10% 3 bed dwellings
- 7% 4 bed dwellings

■ 4% 5 bed dwellings

The units will be spread over all floors of the development and arranged to maximise residential amenity. As the client, the London Borough of Brent have identified the above unit mix as appropriate for the demand in the area, which also helps to deliver mixed communities.

Please see Appendix B of the Design and Access Statement for a full schedule of accommodation.

5.7 Tenure split

The proposed development will deliver 100% affordable social rented housing, considerably exceeding the policy requirement that 50% of all new housing delivered across London must be genuinely affordable.

5.8 Cycle and Car Parking

The proposed development will supply 134 long stay and 39 short stay cycle parking spaces in the following configuration:

Cycle Store A: 112 double-stacked spaces for residential and workspace, short stay and long stay

Cycle Store B: 26 double-stacked spaces for FE long stay

Cycle Store C: 36 spaces (18 Sheffield stands) for FE short stay

Total: 133 long stay and 40 short stay

The provision for the 65 residential units is 104 long stay spaces and 2 visitor spaces, corresponding to 1 space for each 1 bed unit and 2 spaces for each 2 bed + unit. The draft London Plan requires 1.5 cycle parking spaces for each 1 bed unit, resulting in a shortfall of 13 cycle parking spaces against policy, but the proposals still represents a significant level of provision that has been agreed in principle with the LB Brent planning team during the PPA process. Cycle store A is shared with the FE college, meaning that there can be a degree of overlap where residents will take their bikes out during the day when college users require parking spaces,

resulting in extra capacity in the evenings when the college cycle parking spaces are not required.

The proposed development is largely car free, reducing the number of car parking spaces from the 14 existing to the 9 proposed. Policy T6 of the draft London Plan encourages car-free development in places that are well-connected by public transport and 1 Morland Gardens has a PTAL rating of 4, representing a good level of public transport access. Following a review of existing parking stress, it can be concluded that any minor increase in on-street parking demand resulting from the proposals can be comfortably accommodated on local roads.

The proposals include 9 car parking spaces in the lower ground floor. There is capacity to provide up to 7 wheelchair spaces, which exceeds the requirement for all wheelchair units to have access to a dedicated wheelchair accessible parking space. The intention is to provide 5 dedicated wheelchair accessible spaces initially, which can be expanded in accordance with demand. The remaining spaces can be used by FE college staff.

2 of the 9 parking spaces will have active charging facilities, with passive provision for all remaining spaces in accordance with the draft London Plan.

5.9 Access

Pedestrian entrances will be located along Hillside, Brentfield Road and Morland Gardens. Cycle parking will be located on the lower and upper ground floor so that it is accessible from street level. Access to the car parking spaces will be from Morland Gardens via a ramp to the lower ground floor parking area.

The proposed FE college will be located on a single level so that it is fully accessible.

The new London Plan, in Policy D5, ensures that at least 10 per cent of dwellings meet Building Regulation requirement M4 (3) 'wheelchair user dwellings', and all other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. Seven of the 65 units will meet the M4(3) standard and the remainder will meet M4(2) standards.

5.10 Waste and refuse

A hierarchical waste management strategy of “Prevent, Reduce, Reuse, and Recycle” will be employed during the design, construction and operation of the building. The development will provide refuse bins for the FE college and residential units in the west core and refuse bins for residential units only in the east core. This includes capacity for dry recycling. Refuse storage has been allocated on the lower ground floor and can be moved easily through an external door to the street. Servicing and refuse collection for all uses will be undertaken along the site frontage from A404 Hillside. Refuse collection vehicles and larger service vehicles will be accommodated on the proposed shared surface loading bay located on A404 Hillside. Servicing will also be possible north of the site from Morland Gardens, making use of an existing turning head to be landscaped.

During construction a Site Waste Management Plan will be utilized to ensure a thorough approach to waste control is maintained. Operational waste is provided for, including facilities for recycling and storage, as per local plan and BREEAM requirements.

5.11 Energy

An Energy, Sustainability and BREEAM Assessment has been prepared and submitted in support of this application which sets out the energy strategy for the proposed building against the GLA's energy hierarchy and the requirement for a minimum of at least 35 per cent reduction in CO2 emissions beyond Building Regulations in accordance with policy SI2 of the New London Plan. Please see the separate report for full details of the strategy, but in summary:

- **Be Lean:** Using robust passive design measures the proposed buildings emit less CO2 than the equivalent 'notional building'. To minimise energy demands solar gains have been controlled using deep window reveals and sensibly sized glazing and active cooling demand has been limited through detailed iterations of overheating analysis. Daylighting has been optimised in FE College areas to provide good daylighting without excessive solar gain thus minimising cooling demands and lighting loads.

- **Be Clean:** There is no existing nearby heat network within a sensible range for connection to this building and The use of CHP for this building has not been considered due to the increase in CO2 emissions that would result. The strategy proposes a low temperature energy network and each residential unit will have its own local heat pump unit to extract heat from this network when heating or producing hot water and to reject heat to this network when cooling the apartment. The FE College plant will work in the same way.
- **Be Green:** On-site renewable energy sources have been considered to meet the energy targets of a minimum of 35% reduction in CO2 emissions on site when measured using the SAP 10 Carbon Factors. The rigorous application of the Mayor's Energy Hierarchy has resulted in a reduction on site greater than 35% as required by the London Plan.

A BREEAM pre-assessment has been undertaken, and both parts of the proposal (Adult Education Centre and Affordable Workspace) are on track to achieve BREEAM Excellent rating, with current minimum scores of 72.99% and 71.55% respectively.

5.12 Air Quality

The application site and the immediate surrounding area are covered by an Air Quality Management Area ('AQMA'), which are designated by the Council when air quality objectives are not being met. This means that air quality is a particularly sensitive material consideration for the application and an Air Quality Assessment, including an Air Quality Neutral Assessment, has been submitted with the application to assess the potential impacts. This demonstrates that impact from the short-term construction activities will be small to medium and the air quality neutral assessment demonstrates that the proposed development will meet transport emission benchmarks in accordance with policy 7.14 of the London Plan.

An Energy, Sustainability and BREEAM Assessment has been prepared and submitted in support of this application in accordance with policy CP 19 of the Brent Core Strategy. This documents sets out the baseline emissions for the proposed scheme, along with an appraisal of the GLAs energy hierarchy, wider sustainability impacts and a

BREEAM assessment. Due to the high levels of noise and air pollution the entire FE College and all apartments need to be mechanically ventilated for fresh air and actively cooled for summertime comfort. All the apartments are to be fitted with activated carbon filtration on the fresh air inlets to purify the incoming air. Please see part 5.11 of this report for further details of the energy strategy.

5.13 Amenity space

All of the flats in the proposed scheme will comply with the London Plan policy D4, which requires a minimum of 5sqm of private outdoor space for 1-2 person dwellings and extra 1 sqm for each additional occupant, with a minimum depth of 1.5m. Development Management Policy 19 sets a far higher standard, requiring 20sqm per flat and 50sqm for family housing (including ground floor flats). It is not practical to meet these higher standards for private amenity space due to space restrictions, but in addition to London Plan compliant private amenity space there is a generous provision of communal amenity space. All of the communal amenity space will be accessible to all residents and will provide attractive green spaces that benefit from good levels of daylight and sunlight. Please see the submitted landscape design and access statement for further details.

5.14 Play space

The requirements for children's play space have been calculated based on the GLA population yield calculator, the full calculations are set out in part 4.2 of the submitted landscape strategy.

There is capacity for 300sqm of play space within the site, split into three primary areas within the building, as well as a small 20sqm play space to the north-east of the application site. The play provision on-site will comprise the central garden, including large timber recliners for all ages, climbing elements for young children, and stepping stone pathways through the planting for exploration. The Community Garden will have designated play areas including trampolines, moundings and play specialised play equipment. The Rooftop Garden contains a sandpit and stepping stone trail, and at ground level there are granite kerbstones for climbing and playing. The intention is for this to cater to 100% of the

0-3 years requirement and with additional opportunities for children aged 4-10 years.

The remainder of the provision for 4-10 years, as well as 11-15 years and 16-17 years will be delivered off-site through financial obligations to be agreed with LB Brent. The local green space and play space analysis in part 4.1 of the submitted landscape strategy sets out the open spaces and playgrounds within 100m, 400m and 800m of the site with potential for upgrades.

We consider this provision to be appropriate for the site and in accordance with the London Plan requirements for 10sqm of play space per child. Although ideally all of the provision would be on-site, the urban nature and size of the site makes this impractical and the proposed strategy for on-site provision for younger years coupled with a financial contribution for off-site provision for older years is typical for sites of this size and location. The on-site provision will be high quality and has been integrated into the proposed open spaces in a thoughtful manner.

6. Conclusions

In conclusion, the proposal will deliver a mixed-use development, revitalising a currently inefficient building that is unfit for purpose. The location on a prominent crossroads presents an opportunity for the design to be of exceptional quality, and help mitigate the impacts of climate change. The proposed development will serve a number of functions:

- New classrooms, offices, IT suites, a café, and multi-functional spaces for the Further Education College.
- Affordable Workspace for the local area.
- A range of different sized dwellings, and 100% affordable housing.
- A range of amenity spaces including a residents' garden, terraces, and a revitalised community garden.

In light of the building's relatively good access to public transport, it is expected that the majority of journeys will be made using such public transport, and some via private vehicles, motorcycles and cycles. The impact on the local road network should therefore be minimal, and only 9 car parking spaces are proposed for residents and employees.

Overall, the negligible significance of the current locally listed building, and the restrictions that this would impose on the future development help to justify the demolition of the building. This demolition would result in the creation of spaces of greater quality, scale and efficiency than those created if the existing building was retained. The proposals are consistent with the planning policies of the NPPF, London Plan, New London Plan, and the Brent Local Plan, and should be approved without delay.

An architectural rendering of a modern, multi-story residential building. The building features a curved facade with a grid of windows and balconies. The balconies have metal railings and some have small planters. The ground floor has large glass windows and a central entrance labeled 'STONEBRIDGE CENTRE'. There are trees and a paved area in front of the building. A large red rectangle is overlaid on the top right of the image, containing the title and date. A smaller red rectangle is overlaid on the bottom right, containing the firm's name and logo.

Morland Gardens

Planning Statement

January 2020

Tibbalds

planning and urban design

Quality Assurance	
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1. Introduction

This Planning Statement has been prepared on behalf of the London Borough of Brent as the applicant in support of a full planning application which is submitted to the London Borough of Brent as the local planning authority.

The application site ('the site' or '1 Morland Gardens' or 'the Stonebridge Centre') is made up of a series of buildings of different ages, with a Victorian core that has been extended and altered many times since it was built in the 1880s. The building is currently occupied by the Brent Adult and Community Education Service and Victim Support. The existing building is unfit for purpose due to poor accessibility and limited opportunities to extend the premises to meet modern requirements.

In light of these restrictions, the applicant is proposing to demolish the current building and replace it with the following:

- 65 new homes at a range of sizes, 100% of which will be affordable.
- 2,650 sqm GIA of new learning space for the Further Education College
- 750 sqm of affordable workspace

The description of development is:

'Demolition of a series of existing buildings, erection of a new mixed use building ranging in height from two to nine storeys, to provide 65 dwellings (use class C3), 750 sqm of affordable workspace (use class B1), 2,650 sqm new further education college (Class D1), with associated amenity areas, public realm improvements, car and cycle parking and refuse/recycling stores'.

The format of the application and supporting technical documents was agreed with officers during the pre-application stage. This Planning Statement describes the site, the proposed development, planning context and assesses the development against relevant planning policy.

The application is supported by the following documents:

- i. Application form and Ownership Certificates
- ii. CIL form
- iii. Architecture plans, including:
 - a. Location plan
 - b. Block plan

- c. Existing site sections
- d. Proposed site sections
- e. Proposed floor plans
- f. Proposed elevations
- g. Proposed sections
- iv. Design and Access Statement
- v. Planning Statement
- vi. Landscape Design and Access Statement
- vii. Historic Building Assessment
- viii. Preliminary Ecological Assessment, including Bat Surveys
- ix. Drainage Strategy
- x. Foul Sewage and Utilities Assessment
- xi. Daylight/Sunlight Assessment (internal)
- xii. Daylight/Sunlight Assessment (neighbouring properties)
- xiii. Arboricultural Survey and Report
- xiv. Ground Conditions Report
- xv. Basement Impact Assessment
- xvi. Air Quality Assessment, including Air Quality Neutral Assessment
- xvii. Energy Statement
- xviii. Lighting Assessment
- xix. Noise and Vibration Assessment
- xx. Transport Statement and Travel Plan
- xxi. Fire Strategy
- xxii. Wind Microclimate Assessment

■ 2. The site, location and context

The entire 1 Morland Gardens site is within Brent Council's ownership. The site is located in the south of the London Borough of Brent, and sits in the north-west corner of the crossroads of the A404 Hillside, and Brentfield Road. The site is 10 minutes' walk north-west from Harlesden High Street.

The Stonebridge area is predominantly residential, with architectural styles ranging from Victorian terraces to the east, post-war apartment blocks to the north, and more modern developments further west along Hillside.

The original building has a similar historic value to the proposal site, however it has since had a number of insensitive extensions added. The property at No.2 Morland Gardens neighbours the site to the north. To the west of the site is 1-7 Hillside, an apartment block completed in 2009, which connects to the Brent Hub Community Enterprise Centre. The remaining sides are bounded by two main roads (A404 Hillside and Brentfield Road). Across the road, directly south of the site is St Michael & All Angels Church, a late nineteenth century church well-used by the local community.

The existing building is set back from the main road, behind an area of planting, and a car park that wraps around the perimeter of the building. A community garden is located on the eastern edge of the site. The site is highly accessible, with an excellent public transport accessibility level (PTAL) of 4. The nearest station is Harlesden Overground station, which is 10 minutes' walk south of the site, and Stonebridge Park underground station which is only 20 minutes' walk. There are a number of bus stops nearby providing routes into Euston, and across to Kilburn.

■ 3. Pre-application Engagement

The proposals have been developed in consultation with the LB Brent planning team over a series of PPA meetings. At the initial meetings the general development strategy was discussed, with subsequent meetings focussing on specific key elements of the design, especially heritage, residential amenity, daylight, sunlight and height.

■ PPA 01 - 08/03/2019:

- Introduction to the project and the strategic brief.
- Client explained that discussions with neighbours were to take place to finalise consultation with all key stakeholders
- Discussions focused on the key material considerations, including separation distances and sunlight/daylight, and the need to comply with policy.
- Discussion surrounding building height highlighted that a tall building could be justified in order to include education space, affordable workspace, and outstanding design quality.
- Amenity space for residents would be prioritised, and requirements would meet London Plan policy.
- Further engagement with Heritage Officer required to discuss loss of locally listed villa.
- The council were supportive of the tenure mix and split

■ PPA 02 – 24/03/2019:

- Further discussion around the retention of the locally listed villa - two options to be explored: 1) retention of core parts of the villa, 2) removal of the villa as part of a new build scheme.
- Architect's to adjust massing to ensure compliance with SPD 1 with regard to sunlight/daylight.
- Agreement that as the building is now proposed to be over 30m, it will be referred to the GLA,.
- The council stated that 0-4 age group play space should be provided on-site, but that older age group play space could be provided in local parks within 400m

■ PPA 03 – 06/06/2019:

- Architects agreed to revisit the sunlight/daylight modelling to reduce impact on neighbouring amenity by applying policy from SPD 1.

- The council approved of the materials suggested, but highlighted that the quality of these materials would be critical to the success of the project.

■ PPA 04 - 12/07/2019

- The position and orientation of the proposal was adjusted to improve the sunlight/daylight credentials of the scheme.
- The GLA have updated their play space calculator, and this will need to be acknowledged in the proposal.
- Details around refuse collection still need to be discussed with the highways team.
- No further PPA meetings required.

Please see the Design and Access Statement for details of design development and details of public engagement.

■ 4. Development Plan and Planning Considerations

The Development Plan

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

The Development Plan for the site consists of the following planning policy documents:

London

The London Plan (Draft) (December 2017) ('DLP')

London Borough of Brent

Core Strategy (July 2010) ('CS')

Development Management Policies (November 2016) ('DMP')

Brent Design Guide (SPD1) (November 2018) ('SPD1')

Basements SPD (June 2017)

National

The National Planning Policy Framework (February 2019) ('NPPF') is also a material consideration.

5. Planning Policy Assessment

Through the design and development process the Applicant and their design team have sought to deliver a high-quality response that strikes an appropriate balance between the site constraints and planning policy considerations.

The following topics cover the key material planning considerations raised by the proposed scheme.

- 5.1. Heritage
- 5. 2. Sunlight and Daylight
- 5. 3. Separation distances and residential amenity
- 5. 4. Building height
- 5. 5. Trees
- 5. 6. Unit mix
- 5. 7. Tenure split
- 5. 8. Parking
- 5. 9. Access
- 5. 10. Waste and refuse
- 5. 11. Energy
- 5. 12. Air Quality
- 5. 13. Amenity space
- 5. 14. Play space

The following section demonstrates how the scheme has been designed in response to site constraints, policy requirements and PPA feedback.

5.1 Heritage

The London Borough of Brent has published a schedule of locally listed buildings which identifies non-designated heritage assets in the Borough. This list includes the Stonebridge Centre (1 Morland Gardens, ref. 004). Buildings and structures included on this list are considered to be of good quality design or to have historical significance, however they are not statutory listed on the National Heritage List for England. This means that the Stonebridge Centre isn't granted the same level of protection that listed building status would afford, but the Council will take the building's historic significance into account when determining a planning application that affects it. For the purpose of this application we consider that the significant element of the building is the older part dating from the 1880's ('the historic core') and not the modern expansion covering the north west portion of the site.

The design team have carefully considered a wide range of development options for the application site, including options that retain the historic core of the building, but have determined that it is not viable to retain it. This application is therefore proposing to demolish all of the existing buildings on the site and replace them with new build. This iterative design process has been set out in detail in Appendix A of the submitted Design and Access Statement, and helped the design team reach this conclusion. We consider this approach to be supportable for the following reasons.

1. The existing building has been subject to numerous incremental changes since it was originally built, including several modern extensions and modifications to room layouts. Whilst much of the Victorian exterior of the historic core remains intact, the interior has been extensively modified, resulting in many of the original features being lost. This has degraded the historical significance of the building and there are many other better examples of Victorian mansion blocks in the Borough and London as a whole. The submitted Historic Building assessment catalogues the building in detail and supports this position.
2. The existing building is not fit for purpose since it was not originally constructed for education purposes. There is a recognised need in the Borough for new adult education facilities and the structure of a Victorian house is not

suitable for modern educational needs. The proposed adult education centre will be over a single storey to allow for better access for people with disabilities, something that is impossible to provide for with the current structure. The Victorian structure can also not physically accommodate modern classrooms and the facilities that they require, with the proposed facility providing a significant uplift in floor space.

3. Retaining the existing building results in significantly less educational floorspace and affordable housing provision. At the beginning of the design process many options were explored to retain the historic core of the building and construct around it, but this resulted in a significantly smaller adult education facility and less housing.
4. The proposed building will positively contribute to the character of the area. Presently the frontage along the A404 is weak, with the buildings set back from the road and the junction to the south-east. Coupled with the broad and busy roads to the south and east, the result is an uninviting public realm. Bringing the proposed buildings closer to the road and increasing the height on the corner of the A404 and Brentfield Road will result in a much stronger frontage and a prominent building appropriate for the location.
5. Care has been taken to integrate the proposed building into the existing townscape. The proposed building is fundamentally inspired by the Italianate design of the existing house. These include the use of arched window heads across the proposed scheme; the buff-coloured cladding which reflects the original brickwork and the relief panels of the proposed facades that respond to the refined brick textures of the existing structure. Design inspiration has also been taken from the surrounding buildings, including St Michaels church to the south and the Five Precious Wounds church to the north. The use of light terracotta coloured glass reinforced concrete (GRC) for the facade reflects the red brick used in the nearby churches. These panels will be embossed with decorative patterns that have been inspired by the traditional brick arches of the existing building on site. The design of these patterns has not yet been fully developed, however the applicant would be happy to accept securing the quality of facade materials through

a condition. This will guarantee the delivery of a high-quality facade.

Overall we consider the proposals to accord with planning policy. As the submitted documents demonstrate, the many incremental internal and external changes to 1 Morland Gardens have eroded the historical significance of the building, which is reflected in the non-statutory listing. Options to preserve the remaining historic elements have been carefully considered from the beginning of the design process, informed by detailed survey work to build a clear understanding of the historic elements of the building in the context. On balance, the design team concluded that the minimal significance of the historic core is outweighed by the need for new education facilities and housing in the Borough.

We therefore consider the proposals to conform with London Plan Policy HC1 and Policy DMP 7.

5.2 Sunlight and Daylight

The daylight and sunlight impact on neighbouring properties and within the proposed development are central to the submitted designs, with several rounds of testing and pre-application discussions taking place to develop a supportable scheme.

Neighbouring Properties

This iterative design process has resulted in the following design elements to minimise the impact on neighbouring properties at 2 to 8 & 21 Hillside, Stonebridge Evangelical Church, St Michaels and All Angels C of E Church, The Five Precious Wounds RC Church, 2 Morland Gardens and 34 Craven Park. The application is supported by a full daylight and sunlight study for neighbouring properties, which sets out the results in full.

The massing of the proposed building has been carefully designed to minimise the impact on neighbouring properties. For example, the tallest elements of the scheme are pushed to the north of the site away from the three storey houses on Morland Gardens. The two blocks which comprise the majority of the residential accommodation also vary in height from 5 to 9 storeys, stepping down to limit impact on the properties to the west and stepping up to the prominent urban corner of Hillside and Brentfield Road.

The proposal was developed through detailed discussions between the design team and planning officers, and in order to further reduce the impact of the scheme, the proposed building was shifted 2m south and 2m east in order to increase separation distances from neighbouring properties. In addition, the entire western block was redesigned, with a significant reduction of height and volume to the north west corner of the scheme, allowing improved light transmission to the windows of 2-8 Hillside. This west block was also angled to allow light into the gardens and rear windows of 2 Morland Gardens.

The result of these incremental changes is a high level of compliance with BRE guidance, with 93% of neighbouring windows passing. In evaluating these results, it should also be noted that the site is in a relatively dense urban context and can be considered under-developed at present. In such a context, the BRE guidance is normally applied flexibly and we would therefore consider the development to be in a very supportable position. Finally, it is significant that the windows at 2 Morland Gardens which do not meet standards fail due to their unusually close proximity to the site boundary.

Please see the submitted neighbouring properties sunlight and daylight report for a full appraisal of the scheme.

Internal Results

The submitted internal daylight and sunlight report demonstrates that the proposed scheme secures a high level of compliance with the BRE guidance. The scheme has been designed so that 100% of the flats are dual aspect and will have acceptable levels of daylight and sunlight year round.

The central courtyard garden (Garden 1) fails to meet BRE guidance for sunlight on 21st March, however the remaining amenity space meets guidance and we consider this to be an acceptable approach given the structure of the proposed building and the urban nature of the site. Securing compliance for garden 1 would result in a loss of residential units and we consider the excellent internal results to be more pertinent at this time of the year.

Please see the submitted internal sunlight and daylight report for a full appraisal of the scheme.

We therefore consider the proposals to accord with the new London Plan Policy D4.

5.3 Separation Distances and Residential Amenity

Policy 5.1 of the Brent Design Guide SPD1 requires that directly facing habitable rooms should have a minimum separation distance of at least 18m, except where the existing character of the area does not encourage this. Careful consideration has been given to the massing and layout of the proposed development to ensure adequate amenity and privacy for new residents and protect that of existing residents to ensure compliance with policy, especially where the separation distances to neighbouring properties are minimal.

The residential apartment block at 1-7 Hillside has a number of windows facing the site, however the proposed development will be at an appropriate separation distance of 18m from this block. Additionally, the tallest element of the proposed West residential block has been placed to the South of the site opposite the stair core of 1-7 Hillside, and one dual aspect apartment, which is primarily oriented away from the proposal (facing southwards over Hillside Road).

As previously mentioned in Section 5.2, 2 Morland Gardens, the residential block directly to the north of the site, is located very close to the property boundary. The separation distance to the proposed building ranges from 10 to 15m, as the buildings do not face each other directly. In order to address this separation distance, all units to the northern face of the building are dual aspect and predominantly face towards the South. The remaining windows that face 2 Morland Gardens will be small in size and angled to screen views and preserve the existing residential amenity. It should also be noted that the adjacent windows in 2 Morland Gardens are to secondary flank elevations, and there are numerous instances in the local area among the semi-detached houses on Craven Park and Bruce Road where flank elevations to 3 storey buildings contain small windows that are less than 10m distance from each other. Therefore the proposed treatment of this boundary is consistent with the character of the local area.

The Brent Design Guide SPD 1 states that the '30 degree rule' and '45 degree rule' should be employed, which requires the building envelope to be set below a line of 30 degrees from the nearest habitable room window of adjoining existing properties, or 45 degrees where the

proposal would overlook a garden/private amenity space. This is relevant when assessing the proposed building's relationship with 2 Morland Gardens, however when applying the 'mirror test', this allows for the volume of the west block and northern maisonettes to be slightly increased. It is considered that the amenity space at No. 2 Morland Gardens that will be affected by this slight increase in height is exempt from the '45 degrees' rule as the flat is served by additional areas of amenity to both the front and back of the property.

Overall, the residential area of the scheme will achieve appropriate internal ambient noise levels specified in BS8233 as long as the specification of façade elements, such as attenuated wall ventilators, are provided. Windows will have to remain closed to maintain appropriate internal noise levels, however, overheating mitigation methods will be provided by a mixture of mechanical and natural ventilation strategies. As the windows must remain closed in the educational area to meet the required internal ambient noise levels, a mixture of natural and mechanical background ventilation strategies will also be employed here. Mechanical cooling and ventilation will be used on the southern side of the building where the windows are able to remain closed. In the northern half of the building, internal levels can be achieved during normal ventilation conditions with operable windows or other natural ventilation openings.

All residential units will be dual aspect and comply with the London Plans standard for private residential amenity.

5.4 Building height

The proposed massing and height of the building has been developed in consultation with LB Brent through the pre-application PPA process and in consultation with sunlight and daylight specialists. The result is a development height of between 2 and 9 storeys.

This height is based on precedent set by the heights of other building in the immediate vicinity, which also range from 5 to 9 storeys and developed based on a 5-storey datum for the site. From this datum, the massing has been adjusted to allow light deeper into the block, and reduce over-bearing on the surrounding buildings. The two storey maisonettes at the edges of the block represent the lowest residential development height, and allow light into the central

courtyard. The western block height has been adjusted to seven storeys in total, reducing the effects on neighbouring residential amenity.

The site location on the corner of a prominent crossroads justifies the increased height of the eastern block to nine storeys. We consider the proposed height and massing of the building to respond positively to existing context and character of the area, and respect human scale.

We therefore consider the proposals to be in accordance with the London Plan and principle 3.1b of the Urban Design Compendium

5.5 Trees and Green Spaces

There will be 39 category B trees and a single Category U Tree removed in to accommodate the proposed development.

Across the site, the proposal is for a development set in an attractive and memorable setting which sensitively integrates into the wider landscape. A range of landscaped areas will be provided across the development, including a community garden, and green and biodiverse roofs. At street level, the arrival garden will feature new planting and trees, and retain the existing London Plane Tree. These features will act as a buffer to Brentfield Road, provide a comfortable environment for people to enjoy, as well as help to capture and filter stormwater runoff. Along the southern boundary against Hillside, deciduous trees will mark each end of the building. In the Sky Garden, deciduous tree planting will provide some sun protection and privacy to residents at this level.

Across the rest of the development, and on the rooftops, 38 multistem trees are proposed, which will result in a significant uplift in the quality of trees on the site.

5.6 Unit mix

The proposed development will provide 65 new dwellings, with the following unit mix:

- 40% 1 bed dwellings
- 18% 2 bed dwellings
- 10% 3 bed dwellings
- 7% 4 bed dwellings

■ 4% 5 bed dwellings

The units will be spread over all floors of the development and arranged to maximise residential amenity. As the client, the London Borough of Brent have identified the above unit mix as appropriate for the demand in the area, which also helps to deliver mixed communities.

Please see Appendix B of the Design and Access Statement for a full schedule of accommodation.

5.7 Tenure split

The proposed development will deliver 100% affordable housing, considerably exceeding the policy requirement that 50% of all new housing delivered across London must be genuinely affordable. The proposed tenure split will be a policy compliant 70% social rent and 30% intermediate in accordance with policy DMP 15. The final mix and allocation of units to specific tenures is to be determined following planning approval.

5.8 Cycle and Car Parking

The proposed development will supply 134 long stay and 39 short stay cycle parking spaces in the following configuration:

Cycle Store A: 112 double-stacked spaces for residential and workspace, short stay and long stay

Cycle Store B: 26 double-stacked spaces for FE long stay

Cycle Store C: 36 spaces (18 Sheffield stands) for FE short stay

Total: 133 long stay and 40 short stay

The provision for the 65 residential units is 104 long stay spaces and 2 visitor spaces, corresponding to 1 space for each 1 bed unit and 2 spaces for each 2 bed + unit. The draft London Plan requires 1.5 cycle parking spaces for each 1 bed unit, resulting in a shortfall of 13 cycle parking spaces against policy, but the proposals still represents a significant level of provision that has been agreed in principle with the LB Brent planning team during the PPA process. Cycle store

A is shared with the FE college, meaning that there can be a degree of overlap where residents will take their bikes out during the day when college users require parking spaces, resulting in extra capacity in the evenings when the college cycle parking spaces are not required.

The proposed development is largely car free, reducing the number of car parking spaces from the 14 existing to the 9 proposed. Policy T6 of the draft London Plan encourages car-free development in places that are well-connected by public transport and 1 Morland Gardens has a PTAL rating of 4, representing a good level of public transport access. Following a review of existing parking stress, it can be concluded that any minor increase in on-street parking demand resulting from the proposals can be comfortably accommodated on local roads.

The proposals include 9 car parking spaces in the lower ground floor. There is capacity to provide up to 7 wheelchair spaces, which exceeds the requirement for all wheelchair units to have access to a dedicated wheelchair accessible parking space. The intention is to provide 5 dedicated wheelchair accessible spaces initially, which can be expanded in accordance with demand. The remaining spaces can be used by FE college staff.

2 of the 9 parking spaces will have active charging facilities, with passive provision for all remaining spaces in accordance with the draft London Plan.

5.9 Access

Pedestrian entrances will be located along Hillside, Brentfield Road and Morland Gardens. Cycle parking will be located on the lower and upper ground floor so that it is accessible from street level. Access to the car parking spaces will be from Morland Gardens via a ramp to the lower ground floor parking area.

The proposed FE college will be located on a single level so that it is fully accessible.

The new London Plan, in Policy D5, ensures that at least 10 per cent of dwellings meet Building Regulation requirement M4 (3) 'wheelchair user dwellings', and all other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. Seven of the 65 units will meet the M4(3) standard and the remainder will meet M4(2) standards.

5.10 Waste and refuse

A hierarchical waste management strategy of “Prevent, Reduce, Reuse, and Recycle” will be employed during the design, construction and operation of the building. The development will provide refuse bins for the FE college and residential units in the west core and refuse bins for residential units only in the east core. This includes capacity for dry recycling. Refuse storage has been allocated on the lower ground floor and can be moved easily through an external door to the street. Servicing and refuse collection for all uses will be undertaken along the site frontage from A404 Hillside. Refuse collection vehicles and larger service vehicles will be accommodated on the proposed shared surface loading bay located on A404 Hillside. Servicing will also be possible north of the site from Morland Gardens, making use of an existing turning head to be landscaped.

During construction a Site Waste Management Plan will be utilized to ensure a thorough approach to waste control is maintained. Operational waste is provided for, including facilities for recycling and storage, as per local plan and BREEAM requirements.

5.11 Energy

An Energy, Sustainability and BREEAM Assessment has been prepared and submitted in support of this application which sets out the energy strategy for the proposed building against the GLA's energy hierarchy and the requirement for a minimum of at least 35 per cent reduction in CO2 emissions beyond Building Regulations in accordance with policy SI2 of the New London Plan. Please see the separate report for full details of the strategy, but in summary:

- **Be Lean:** Using robust passive design measures the proposed buildings emit less CO2 than the equivalent 'notional building'. To minimise energy demands solar gains have been controlled using deep window reveals and sensibly sized glazing and active cooling demand has been limited through detailed iterations of overheating analysis. Daylighting has been optimised in FE College areas to provide good daylighting without excessive solar gain thus minimising cooling demands and lighting loads.

- **Be Clean:** There is no existing nearby heat network within a sensible range for connection to this building and The use of CHP for this building has not been considered due to the increase in CO2 emissions that would result. The strategy proposes a low temperature energy network and each residential unit will have its own local heat pump unit to extract heat from this network when heating or producing hot water and to reject heat to this network when cooling the apartment. The FE College plant will work in the same way.
- **Be Green:** On-site renewable energy sources have been considered to meet the energy targets of a minimum of 35% reduction in CO2 emissions on site when measured using the SAP 10 Carbon Factors. The rigorous application of the Mayor's Energy Hierarchy has resulted in a reduction on site greater than 35% as required by the London Plan.

A BREEAM pre-assessment has been undertaken, and both parts of the proposal (Adult Education Centre and Affordable Workspace) are on track to achieve BREEAM Excellent rating, with current minimum scores of 72.99% and 71.55% respectively.

5.12 Air Quality

The application site and the immediate surrounding area are covered by an Air Quality Management Area ('AQMA'), which are designated by the Council when air quality objectives are not being met. This means that air quality is a particularly sensitive material consideration for the application and an Air Quality Assessment, including an Air Quality Neutral Assessment, has been submitted with the application to assess the potential impacts. This demonstrates that impact from the short-term construction activities will be small to medium and the air quality neutral assessment demonstrates that the proposed development will meet transport emission benchmarks in accordance with policy 7.14 of the London Plan.

An Energy, Sustainability and BREEAM Assessment has been prepared and submitted in support of this application in accordance with policy CP 19 of the Brent Core Strategy. This documents sets out the baseline emissions for the proposed scheme, along with an appraisal of the GLAs energy hierarchy, wider sustainability impacts and a

BREEAM assessment. Due to the high levels of noise and air pollution the entire FE College and all apartments need to be mechanically ventilated for fresh air and actively cooled for summertime comfort. All the apartments are to be fitted with activated carbon filtration on the fresh air inlets to purify the incoming air. Please see part 5.11 of this report for further details of the energy strategy.

5.13 Amenity space

All of the flats in the proposed scheme will comply with the London Plan policy D4, which requires a minimum of 5sqm of private outdoor space for 1-2 person dwellings and extra 1 sqm for each additional occupant, with a minimum depth of 1.5m. Development Management Policy 19 sets a far higher standard, requiring 20sqm per flat and 50sqm for family housing (including ground floor flats). It is not practical to meet these higher standards for private amenity space due to space restrictions, but in addition to London Plan compliant private amenity space there is a generous provision of communal amenity space. All of the communal amenity space will be accessible to all residents and will provide attractive green spaces that benefit from good levels of daylight and sunlight. Please see the submitted landscape design and access statement for further details.

5.14 Play space

The requirements for children's play space have been calculated based on the GLA population yield calculator, the full calculations are set out in part 4.2 of the submitted landscape strategy.

There is capacity for 300sqm of play space within the site, split into three primary areas within the building, as well as a small 20sqm play space to the north-east of the application site. The play provision on-site will comprise the central garden, including large timber recliners for all ages, climbing elements for young children, and stepping stone pathways through the planting for exploration. The Community Garden will have designated play areas including trampolines, moundings and play specialised play equipment. The Rooftop Garden contains a sandpit and stepping stone trail, and at ground level there are granite kerbstones for climbing and playing. The intention is for this to cater to 100% of the

0-3 years requirement and with additional opportunities for children aged 4-10 years.

The remainder of the provision for 4-10 years, as well as 11-15 years and 16-17 years will be delivered off-site through financial obligations to be agreed with LB Brent. The local green space and play space analysis in part 4.1 of the submitted landscape strategy sets out the open spaces and playgrounds within 100m, 400m and 800m of the site with potential for upgrades.

We consider this provision to be appropriate for the site and in accordance with the London Plan requirements for 10sqm of play space per child. Although ideally all of the provision would be on-site, the urban nature and size of the site makes this impractical and the proposed strategy for on-site provision for younger years coupled with a financial contribution for off-site provision for older years is typical for sites of this size and location. The on-site provision will be high quality and has been integrated into the proposed open spaces in a thoughtful manner.

6. Conclusions

In conclusion, the proposal will deliver a mixed-use development, revitalising a currently inefficient building that is unfit for purpose. The location on a prominent crossroads presents an opportunity for the design to be of exceptional quality, and help mitigate the impacts of climate change. The proposed development will serve a number of functions:

- New classrooms, offices, IT suites, a café, and multi-functional spaces for the Further Education College.
- Affordable Workspace for the local area.
- A range of different sized dwellings, and 100% affordable housing.
- A range of amenity spaces including a residents' garden, terraces, and a revitalised community garden.

In light of the building's relatively good access to public transport, it is expected that the majority of journeys will be made using such public transport, and some via private vehicles, motorcycles and cycles. The impact on the local road network should therefore be minimal, and only 9 car parking spaces are proposed for residents and employees.

Overall, the negligible significance of the current locally listed building, and the restrictions that this would impose on the future development help to justify the demolition of the building. This demolition would result in the creation of spaces of greater quality, scale and efficiency than those created if the existing building was retained. The proposals are consistent with the planning policies of the NPPF, London Plan, New London Plan, and the Brent Local Plan, and should be approved without delay.

**1 MORLAND GARDENS
STONEBRIDGE CENTRE
London Borough of Brent, NW10 8DY
An Historic Building Assessment**



April 2019



**1 MORLAND GARDENS
STONEBRIDGE CENTRE
London Borough of Brent, NW10 8DY**

An Historic Building Assessment

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Abstract

An Historic Building Assessment was commissioned as part of the pre-planning process on a property at 1 Morland Gardens, Stonebridge NW10 (the Stonebridge Centre). It is proposed to redevelop the site into a new purpose-built Adult Education Centre, with adjoining affordable workspace and residential accommodation over.

The building is currently occupied by Brent Start Adult Education and the independent charity Victim Support, but has at its core a locally listed later-19th century house that was originally constructed as part of the Stonebridge Park estate. Subsequently the building underwent a number of phases of alteration and addition, which probably began with its development as a private members' club in the 1920s. Initially small-scale small changes were overtaken by a major extension to the north between the late 20s and mid-1930s. Further alterations and extensions followed in the 1950s to mid-70s, and again in the mid-1990s after the building had become an Adult Education Centre.

The original house has not been a private residence since the 1920s, and has since been adapted to varying social, public and educational requirements. Although the basic plan of the main building can be determined few internal fixtures or features survive, apart from some windows and plasterwork. There is no apparent trace of the original stables and other ancillary buildings, which lay to the west of the main house.

The external walls of the main Victorian house remain largely intact: the house's south-facing façade (including an early alteration to the original ground floor) still makes an impression on those passing along Hillside. Elsewhere changes in the road layout mean the original main entrance on east-facing façade is somewhat hidden.

In conclusion, the main section of Victorian house at the heart of the present building complex is externally relatively intact, but internally heavily altered and little more than a shell into which later functions have been introduced. The building has been repeatedly modified since the 1920s, with the design features and fittings of a large private house very largely sacrificed to new and changing demands.

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Figs 10-12, 20, 25-29, 38 and 45 adapted from drawings provided by Curl la Tourelle Head Architecture.

Supplementary Figures in Appendices

1 INTRODUCTION

- 1.1. This document forms an Historic Building Assessment, conducted by Compass Archaeology between January and March 2019. The assessment was carried out in relation to 1 Morland Gardens, also known as the Stonebridge Centre, which is currently occupied by Brent Start Adult Education along with the independent charity Victim Support. The building broadly occupies a plot of land at the corner of Brentfield Road and Hillside in the London Borough of Brent, NW10 8DY (fig.1). Some background research into the earlier history of the site and surrounding area was also undertaken, including a brief survey of earlier maps and Historic Environment Record data.

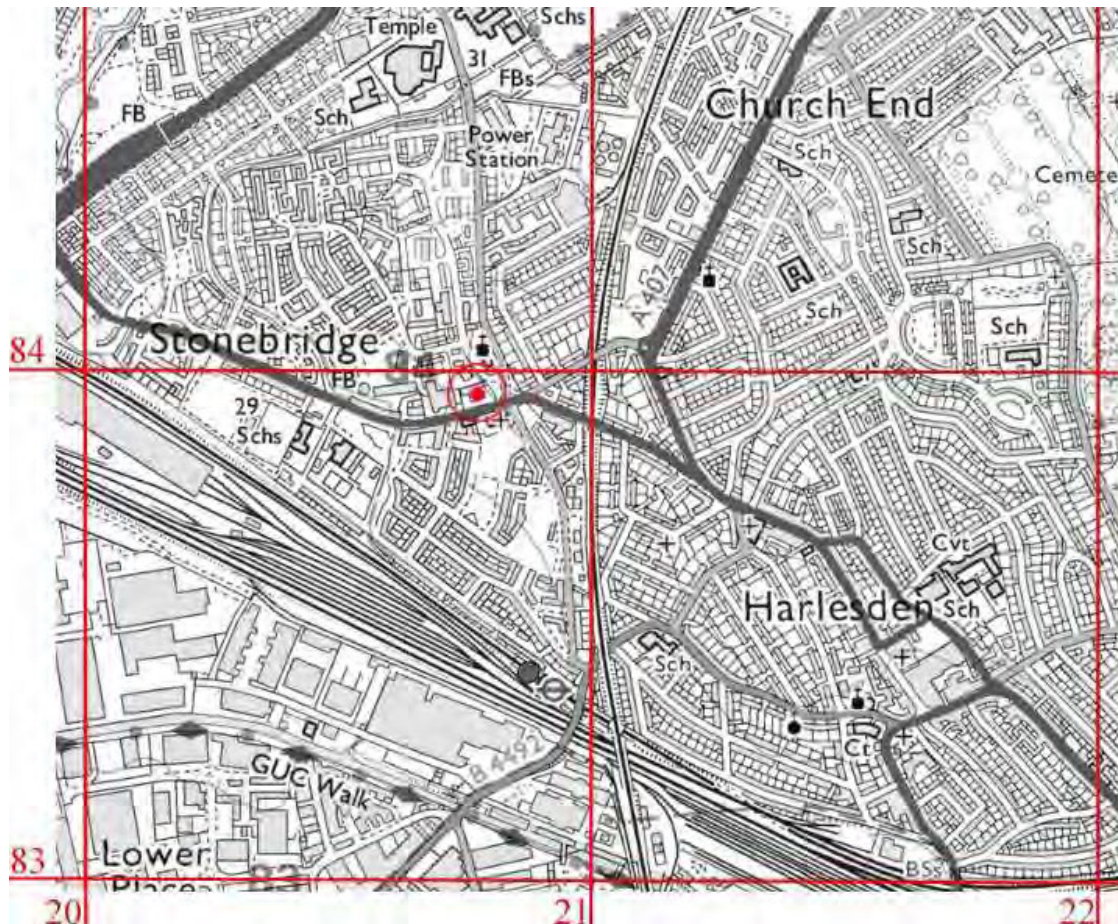


Figure 1: Site location on current Ordnance Survey 1:25 000 map

- 1.2. At the centre of the current building complex is a locally listed, late-19th century house, which will be the main focus of this assessment. It is one of two remaining 19th century houses left from the original Stonebridge Park.
- 1.3. Current redevelopment plans involve the demolition of the later-19th century house and its associated structures and additions. The whole site is to be redeveloped into a new purpose built Adult Education centre, with associated café and affordable workspace, and a significant residential development above.
- 1.4. In light of these proposals, Compass Archaeology was commissioned by Curl la Tourelle Head Architecture on behalf of the London Borough of Brent to carry out the Historic Building Assessment, prior to the submission of a planning application.

- 1.5. A preliminary visit to the site was made on the 5th February 2019, followed by an on-site photographic investigation on the 21st and 22nd February. This was supported by desk-based research, reference to Historic Environment Record (HER) data and by visits to national and local archives to consult relevant documentary, photographic and cartographic sources.
- 1.6. Compass Archaeology would like to thank Curl la Tourelle Head Architecture for sharing their development plans. Thanks also to the staff of the National Archives at Kew, the British Library and Brent Museum and Archives for their assistance during background research.

2 SITE LOCATION

- 2.1 The current entrance to the site is on Morland Gardens, but the site also faces on to Hillside (A404) to the south and, through some public green space, to Brentfield Road to the east. The building complex is aligned broadly ENE-WSW and set within a larger plot of land with the same broad alignment (fig.2).
- 2.2 Morland Gardens is a renamed and partially blocked off section of the original 'Stonebridge Park' road. Therefore in further historical discussion the building will be referred to as being on Stonebridge Park



Figure 2: Current site boundaries in blue. The late-19th century house now subsumed into a larger building complex.

3 METHODOLOGY

3.1 Aim of the survey

The primary objective in this report was to provide an assessment of the building, in terms of its background, development, character and present significance, and in the context of the present proposal for redevelopment of the site.

The report also provides a primarily photographic but also fairly detailed record of the building, both exterior and interior. This is accompanied so far as possible by interpretation and dating of the fabric, although there are areas where further investigation – particularly by means of physical removal of material &/or fittings – would be required to fully establish the history.

- 3.2 In undertaking the survey and report frequent reference has been made to the Historic England (2016) document ‘*Understanding Historic Buildings. A Guide to Good Recording Practice*’. In the case of proposed demolition the principal need is defined as ‘*Assessment of the significance of the building and a record of what is to be lost*’ (*ibid* Table 1). The appropriate level of record in these circumstances ranges from Level 2 to 4 depending on the significance of the building, and may also be carried out both prior to and during dismantling.

In this context it is also worth noting the need to retain flexibility within the levels of recording (*ibid* 27):

5.7.1 *...records will often tend towards one level or another rather than being capable of precise classification.Since destruction is irremediable a more detailed record may be required when fabric will be lost than when it will be preserved. The intensity of the record should nevertheless remain proportionate to the significance both of the fabric at risk and of the building of which it forms part.*

- 3.2.1 Within this report the broad basis adopted has been that of a Level 3 building record, which in part is outlined thus (*ibid* 26):

5.3.1 *Level 3 is an analytical record, and will comprise an introductory description followed by a systematic account of the building’s origins, development and use. The record will include an account of the evidence on which the analysis has been based, allowing the validity of the record to be re-examined in detail. It will also include all drawn and photographic records that may be required to illustrate the building’s appearance and structure and to support an historical analysis.*

5.3.2 *The information contained in the record will for the most part have been obtained through an examination of the building itself. The documentary sources used are likely to be those which are most readily accessible, such as historic Ordnance Survey maps, trade directories and other published sources. The record may contain some discussion the building’s broader stylistic or historical context and importance....’.*

- 3.2.2 The recommended levels of recording include a series of guidelines and options under separate headings – Types of drawing, Types of photograph, and Report sections (*ibid* 14, 19-20 and 22-23).

3.3 The site archive

If no further work is to be undertaken the records of this project, including the building survey and documentary research, will be ordered in line with the MoL *Guidelines for the Preparation of Archaeological Archives* and will be deposited in the Museum of London Archaeological Archive.

Copies of this report will be supplied to the Client and their representatives, and if agreed to Historic England, as well as ultimately being part of the deposited archive.

4 HISTORICAL BACKGROUND

- 4.1** A search of the Greater London Historic Environment Record (GLHER) was undertaken within a radius of 750m from the approximate centre point for the site (NGR: TQ 20778 83953) (fig.3). This produced four events, mainly desk-based assessments which do not specifically cover the area of 1 Morland Gardens. It also produced nine monument records, mainly listed buildings and documentary or antiquarian records. More detailed information on each monument can be found in Appendix I, Table 1.

Figure 3 overleaf shows the location of the nine monument records in relation to 1 Morland Gardens: the numbers shown on the Figure 3 will be used when referencing monuments in the discussion in Table 3. There are however no finds or documented records of archaeological significance in the immediate vicinity of the site.

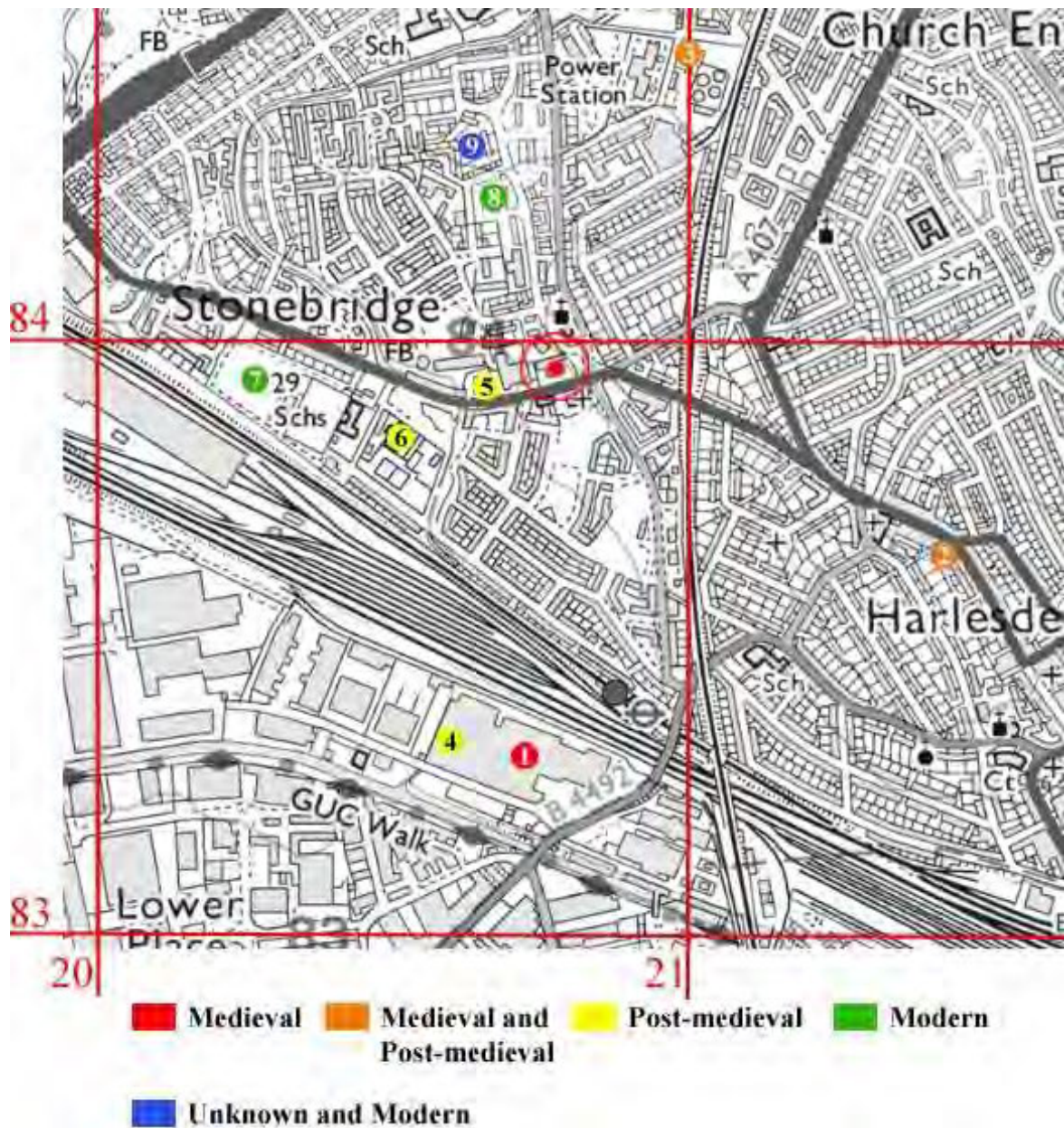


Figure 3: Distribution of HER entries within 750m of 1 Morland Gardens. Site location marked in concentric red circles.

- 4.2 The historical background of this area is well supported by other published written sources and cartographic evidence. A valuable source of information has been the account of Willesden's settlement and growth by Bolton *et al* (1982).

A tithe map held by the National Archives was consulted. However, confusion about the exact date of the map makes it an unreliable source. A copy is, however, included in Appendix I for reference.

The following account details the development and past uses of the house and is illustrated through a series of historical OS maps.

- 4.3 Prior to the mid-19th century the area now occupied by 1 Morland Gardens was probably not built upon. Nevertheless, medieval and post-medieval settlement existed at nearby Harlesden (No.2 on fig. 3) and Church End (No.3 on fig. 3).

- 4.4 In 1866, when the Ordnance Survey recorded the area, the site lay within open fields, within earshot of a rifle range (fig. 4). However, by the time the map was published in 1874, plans for the development of the area were probably well underway.



Figure 4: Extract from the 1874 OS 6 inch map. Approximate site location highlighted in red.

- 4.5 Residential building in the area was stimulated by the opening of a nearby station on the Midland line in 1875. By 1876, a 35-acre site running north from the Harrow Road beside Dog Lane had been covered by a new road, Stonebridge Park, and 60 to 80 'smart new villas for City men' (Bolton, et al., 1982). This included the house still standing at 1 Morland Gardens today. Cherry & Pevsner (1991, p.131) attribute this development to the British architect Henry Edward Kendall Jr (1805–1885), who was District Surveyor for nearby Hampstead from 1844.



Figure 5: Extract from 1894-1896 OS six-inch map. The site, highlighted in red, is now occupied by a large house.

- 4.6 This early housing development was marketed at the upper-middle classes and drew a collection of company directors, solicitors and even a small, girls' finishing school to Stonebridge Park in the 1880s. The surrounding areas, however, were built upon during the 1890s and mostly consisted of terraces for the working class, including launderers serving the wealthier district of Stonebridge Park (Bolton, et al., 1982). Efforts were made to provide a basic education for working class children and in 1900 Stonebridge Primary School was built within a quarter of a mile of Stonebridge Park. It still stands today (No.6 on fig. 3)
- 4.7 The 25-inch, 1894-96 OS map, revised in 1891, (fig. 6) shows a more detailed layout of the house and associated buildings. The map indicates two driveways leading up to the house. One cuts the SE corner of the site and leads up to the front entrance, presumably for the owners. The second enters the site from Harrow Road (now Hillside) to the south and could suggest a service entrance leading up to stables (the long rectangular western part of the building aligned NNE-SSW) as mentioned in census data from the time.



Figure 6: Extract from 1894-1896 OS 25 inch map. Site boundaries highlighted in blue.

- 4.8 Census data, from 1891, tells us that the house, named Altamira, was owned by George A. Hillier and his wife Louisa; they lived there with Louisa's sister, Letitia Wall. They had a cook, Elizabeth Warnes, and a housemaid, Eliza Knight, living with them in the house and a coachman, Arthur Dawes, and his wife and two daughters living above the stables.

Originally from Bristol, at age 67, George Hillier was 'Secretary to the São Paulo (Brazilian) Railway Company' and had been for at least ten years. His employers were a privately owned British railway company in Brazil, which operated the 1,600 mm (5 ft 3 in) gauge railway from the seaport at Santos via São Paulo to Jundiaí.

The name of the house may reflect the owner's Brazilian connection, or that they had an interest in archaeology. Altamira is the name of a cave site with Upper Paleolithic cave paintings, which was only made known to the public in 1880.

- 4.9** The footprint of the house does not appear to alter much between the 25-inch 1894-96 OS map (fig. 6) and the revised 1915 OS map (fig. 7 (left)). Although the projection from the southern face of the building (highlighted by dotted box in Figure 7) has lost its bow-shape.



Figure 7: Left, Extract from 1915 OS 25-inch map; Right, Extract from 1937 OS 25-inch map. In red, definite additions to the building and, in green, a structure possibly retained from 1915 plan, or now covering what was there in 1915.

- 4.10** Significant alteration to the building took place between the 1915 and 1937 OS maps (fig. 7). A mushroom-shaped structure adjoins the house to the north and an extension has been made in the south-west corner

On the 1937 map, it is not actually labelled as a club, like its neighbour, but two early planning permission applications from 1926 refer to the building either as 'The Altamira Club' or 'The Services Rendered Club Ltd'. These documents suggest it had ceased to be a private home by 1926 and was being actively redeveloped for social/leisure purposes. For example, one planning application relates to an extension to the bar (fig. 8).

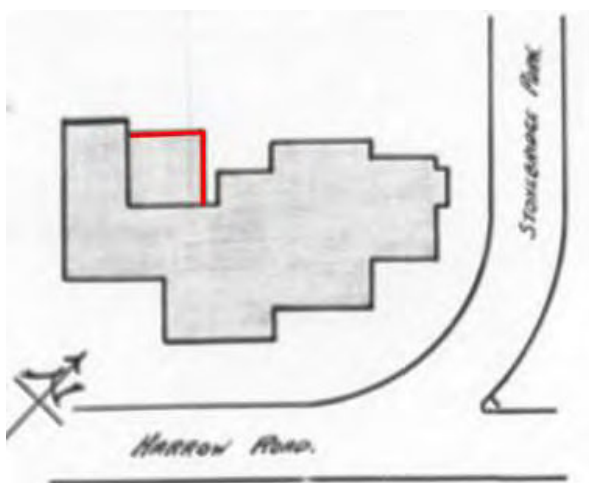


Figure 8: Extract from 1926 planning application (A1173) for a bar extension.

The other application proposed a new concert hall which does not appear on any OS maps in the form suggested in the planning application. Perhaps, the concert hall was not actually built. Alternatively, the large extension to the north of the Victorian house seen on the 1937 OS Map (fig. 7 (right)) could be a concert hall in a revised location and plan.

The fact that no mushroom-shaped extension is present on these 1926 planning applications narrows down the date for this extension to between 1926 and 1937.

- 4.11 On the 1939 Register (an unofficial census taken on the eve of World War Two) the property is recorded as 'Altamira Working Man's Club' with a club steward and his family living in part of the property.
- 4.12 This development corresponds with an overall picture of declining social status in the area in the 1940s. Many of the large houses on Stonebridge Park were converted to flats, institutions or even left derelict. For example, it is in 1939 that the Edgar Lee Home for Invalid Boys (No. 9 on Figure 3), also on Stonebridge Park, closes its doors and, after bomb damage, never reopens, later being demolished.
- 4.13 By the 1955 OS map, the building is labelled simply as the 'Services Rendered Club'. Few records are available to explain the origins or purpose of the Services Rendered Club organisation. It was probably set up after the First World War to support ex-services personnel and is now seemingly defunct (fig. 9).

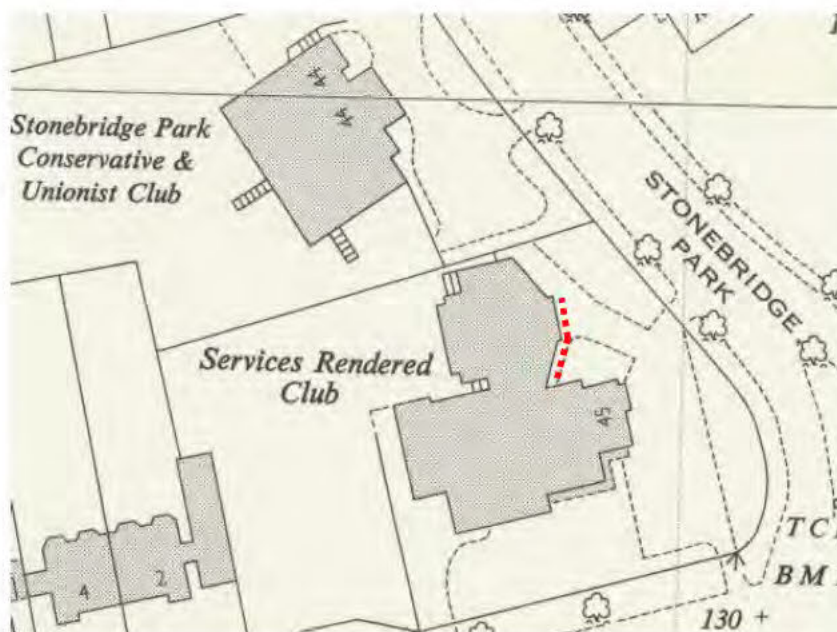


Figure 9: Extract from 1955 OS 1:1250 map. Red line highlights the area of frontage which clearly remains in the 1975 OS 1:1250 map

- 4.14 More recent OS maps, which are not shown here due to copyright restrictions, suggest a large part of the current building was built sometime between 1967 and 1975. This includes the large hall and classrooms on the western part of the site. At this point, the building was still a Services Rendered Club.

The outline of the building on the 1975 OS map suggests that at least part of the frontage of the mushroom-shaped extension (built sometime between 1926 and 1937) remained

(fig. 9). This may suggest that this 1960s/70s development involved extension and refurbishment rather than complete demolition and rebuilding. This 1926-1937 frontage remained until at least the 1997 OS map. At some point after this, the present curved glass frontage was installed.

- 4.15** The building continued as a Services Rendered Club until the mid-1990s, when ‘extensions and alterations’ (see Appendix I) were made to create a community adult education centre for Brent Council. Unfortunately, detailed plans associated with the 1994 planning application (Ref: 93/1429) are no longer held by Brent Council. Apart from the change (post 1997) to the frontage, mentioned above, there do not seem to be many obvious differences between the current footprint of the building complex and the 1975 OS Map. It is therefore unclear, from cartographical evidence alone, what these extensions and alterations were.
- 4.16** According to a number of plaques within 1 Morland Gardens, the Adult Education Centre was established using funds from Brent Council and Harlesden City Challenge Ltd (an urban regeneration agency which carried out projects with funds from local and national government). One plaque also records that a time capsule was buried somewhere near the current entrance in 1994.
- 4.17** The site is currently occupied by a Brent Start learning centre and an independent charity, Victim Support.

5 THE HISTORIC BUILDING SURVEY

- 5.1 A site visit was undertaken on the 21st and 22nd February 2019. What follows is a written description of 1 Morland Gardens, accompanied by relevant photographic evidence, illustrations and discussion of its historic development.

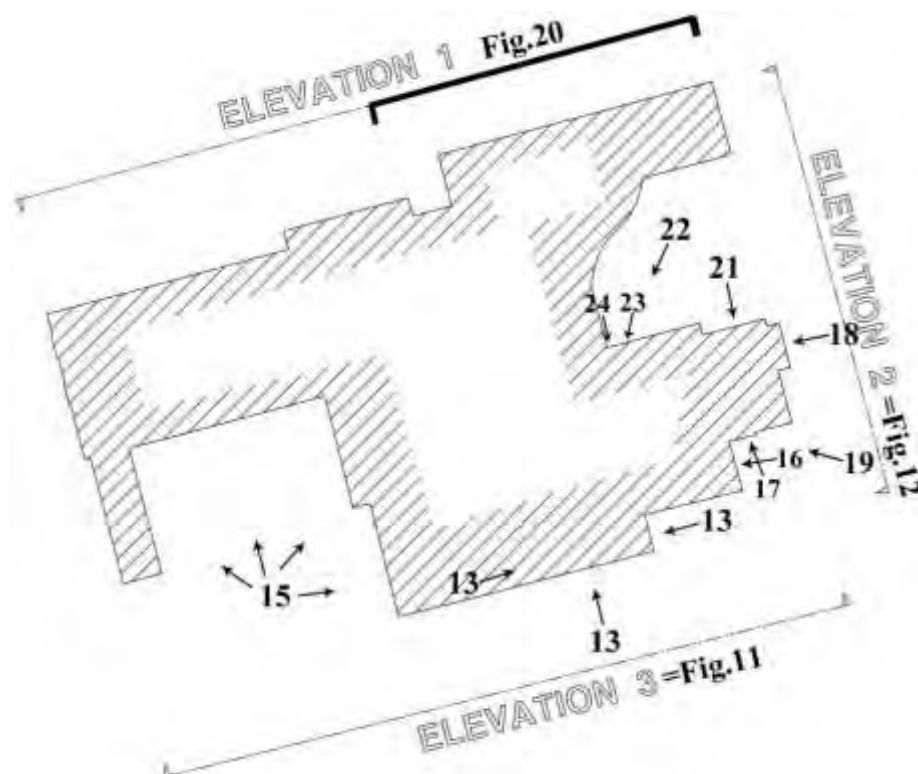


Figure 10: Plan of the exterior of 1 Morland Gardens demonstrating the direction from which figures 11 to 24 were taken. Adapted from Drawing No. TS19_003S/7 provided by Curl la Tourelle Head Architecture.

- 5.2 The building at 1 Morland Gardens, also known as the Stonebridge Centre, ranges between one and four storeys. The maximum length of the building, as illustrated in Elevation 1, is approximately 50m and the maximum width, as seen in Elevation 2, is approximately 30m. Both the original 1870s house and the current building complex are broadly aligned ENE-WSW.

6 THE EXTERIOR

- 6.1 The exterior of the building displays several phases of construction with associated changes in brick bonding and rendering. Some structures which were once external have been subsumed within later extensions. Nevertheless, as you walk around the outside of the building today, structures from the late 19th and early, mid and late 20th centuries can be seen.
- 6.2 The 1870s house is constructed of yellow London stock brick (probably MoL tile fabric code is 3035) laid in Flemish bond coursing with a grey mortar. Where brickwork is exposed on the later 20th century additions, it is generally of a modern yellow-orange stock brick laid in stretcher bond with a yellow-brown mortar. Additional examples of brickwork can be found in Appendix II.

- 6.3** The roof of the original 1870s house is predominantly tiled. Although Rooms E and AJ have flat, felt and concrete rooves respectively. The main section of the house has an open gable roof with two gables stretching out to the east and west. The western gable is cross hipped at the end. The roof of the three story tower is separate from the rest of the tile roof and is a pyramid hip roof. The entrance porch (Room I) also has its own gabled roof, whilst the east-facing frontage of Room J has a half-hipped roof.

The rest of the building complex is covered by either a flat, felt roof or a curved corrugated metal roof.

- 6.4** Features of the exterior, which reveal aspects of the building's history, will be discussed with reference to a number of annotated elevation plans (figs. 11, 12 and 20) provided by the architects, Curl la Tourelle Head Architecture, and photographs taken during the photographic survey.

6.5 Elevation 3 – The south-facing façade (fig. 11)

Discussed in relation to numbered points on Figure 11.

- 6.5.1** As the historical maps suggested, it appears there has been some modification to the room which sticks out from the southern façade, known as Classroom 4, or for the purposes of this report Room E (see figs. 11 and 25).

- 1) The parapet roof obscures the bottom half of first floor windows, which suggests it was not part of the original design, but has been added later.
- 2) The windows, particularly the central, four-paned window, are not in the same proportions as other windows on the ground floor. The appearance of the curved brick lintel above the windows also varies from other windows on this façade and even from the lintel over the shutter below. This suggests they belong to a different building phase.
- 11) Two wooden beams, one of which is also visible in Elevation 2, seem to be offering additional support to the frontage of this room. As seen in Figure 13, this beam does not extend back to where Room E meets Room F. This suggests the beam is a later addition to support a reconfiguration of the frontage of Room E.
- 5) Below the windows is a band of brickwork, which is slightly raised from the rest of the wall. This band continues briefly around the corner to the west, but then stops. This is also the case on the eastern corner, although the end of the band is obscured by ivy. Again this is a feature that suggests the frontage of Room E is a different phase from the walls that join it to the rest of the house.
- 6) The junction between Room E and the porch area to the west is unfortunately obscured by a large air handling unit (AHU). However, it would seem that the porch was built up against Room E.
- 7) Here, the same brick bonding (Flemish style) is used as Room E and the rest of the 1870s house. This along with the cartographic evidence suggests this might have been added between 1915 and 1937. Perhaps, concomitantly or soon after the frontage of Room E was revised (between 1897 and 1915 OS maps).



Figure 13: Exterior of Room E. Looking east (left), north (centre) and west (right). White arrows indicate features mentioned in the text (left, brick band stops) and (right, wooden support beam).

6.5.2 It is also important to note what is missing on the south façade, particularly on the exterior of Rooms F, G and H (see fig. 25 for room identification plan). The following numbers still relate to points on Figure 11.

3) Whilst repairs to brick lintels could result in the loss of original features, the lack of a curved, white stone border around the brick lintels of three windows is noticeable.

4) The discontinuation of another band of raised brickwork at this point is also curious. The band runs along the entire north-facing and east-facing façades, but stops here. Dotted lines on Figure 11 show where it should have continued (see also Figure 19).

These two absences combined with cartographical evidence suggest there was a light structure, such as a covered walkway, that once wrapped itself around this corner of the building. This could have been something like the structure pictured on the first floor of the Stonebridge Park Hotel (fig. 14), which was built around the same time as the houses on Stonebridge Park (Bolton, et al., 1982) and shares stylistic elements.



Figure 14: Victorian postcard showing the Stonebridge Park Hotel, built in the late 1870s/early 1880s.

- 6.5.3** The western half of Elevation 3 (from point (8) to (10) on Figure 11) is all the extension built sometime between the 1967 and 1975 OS maps. Although, the wheelchair access ramp (9) is probably a later addition. The store room indicated by point (10) was also once unconnected to the rest of the building.
- 6.5.4** The external walls of the corridor running alongside the two large halls (behind point (9) on Figure 11 and seen in Figure 15) are clearly built of a more modern yellow stock brick in a stretcher bond, but the exposed brickwork of the rooms below Rooms A, B, C and D are built of a brick more closely resembling the brick type used in the original 1870s house.
- 6.5.5** Below Rooms C and D, the use of a stretcher brick bond suggests a more modern construction date. However, the few exposed bits of wall below Rooms A and B have a Flemish bond. Why these two areas have a different brick bond is unclear, especially when cartographic evidence suggests they are both part of the same westward extension that occurred between 1967 and 1975.



Figure 15: Exterior of western part of site. Looking north (left) and east (right).

6.6 Elevation 2 – The east-facing façade (fig. 12)

Discussed in relation to numbered points on Figure 12.

- 6.6.1** A number of features on Elevation 2 are shared with Elevation 3. This includes the lack of a white lintel border above a window (point 3), the discontinuation of the brick band (point 4) seen on the exterior of Room I, J and K (fig.19) and the support beam (point 11) underneath Room E.
- 6.6.2** In addition, there is clear evidence of an attempt to repair or deal with structural issues around the brick lintel at point 12. Different coloured brickwork and the different curvature of the lintel compared to the neighbouring window (see figs. 16 and 17) suggest this is a relatively modern and unsuccessful repair job.



Figure 16: Brick lintel displaying evidence of repair, but also new cracks.



Figure 17: Window perpendicular to that in Figure 16. Also seen in Elevation 3 next to point (4).

- 6.6.3** The different colour bricks making up the mullion of a first floor window (point 15, see also fig. 18) may suggest a later repair job.
- 6.6.4** All the semi-circular brick lintels on the east-facing façade (fig.18) appear to be original and little altered. They represent a popular Victorian Italianate style of architecture.

- 6.6.5** The red brick lintels appear to be composed of very thin bricks, but they have been made to look thin by scratching lines into the brick and filling them with a white paste. The white paste has deteriorated or become fainter over time depending on its exposure to bad weather.
- 6.6.6** Brackets underneath overhanging eaves are also a characteristic feature of this style of architecture. The brackets on the first and second floors appear to be a consistent size and shape around the house and are probably original 1870s features. The ground floor brackets are a different shape, but not necessarily later than the others (fig.18). Two brackets may have been lost from the north-facing façade (above Rooms AI and AH), as on the south side (above Room AE) there are five brackets, whilst on the north side there are only three.



Figure 18: East-facing façade of Victorian house. Looking W. Different styles of bracket between ground and first floor.



Figure 19: East-facing façade of Victorian house. Looking NW

6.7 Elevation 1 (fig. 20)

Discussed in relation to numbered points on Figure 20.

- 6.7.1 A majority of this Elevation diagram showed the length of the 1960/70s extension stretching off to the west. However, only part of the original elevation drawing is used in Figure 20. It is used to demonstrate two final features noticed on the exterior of the original 1870s house.

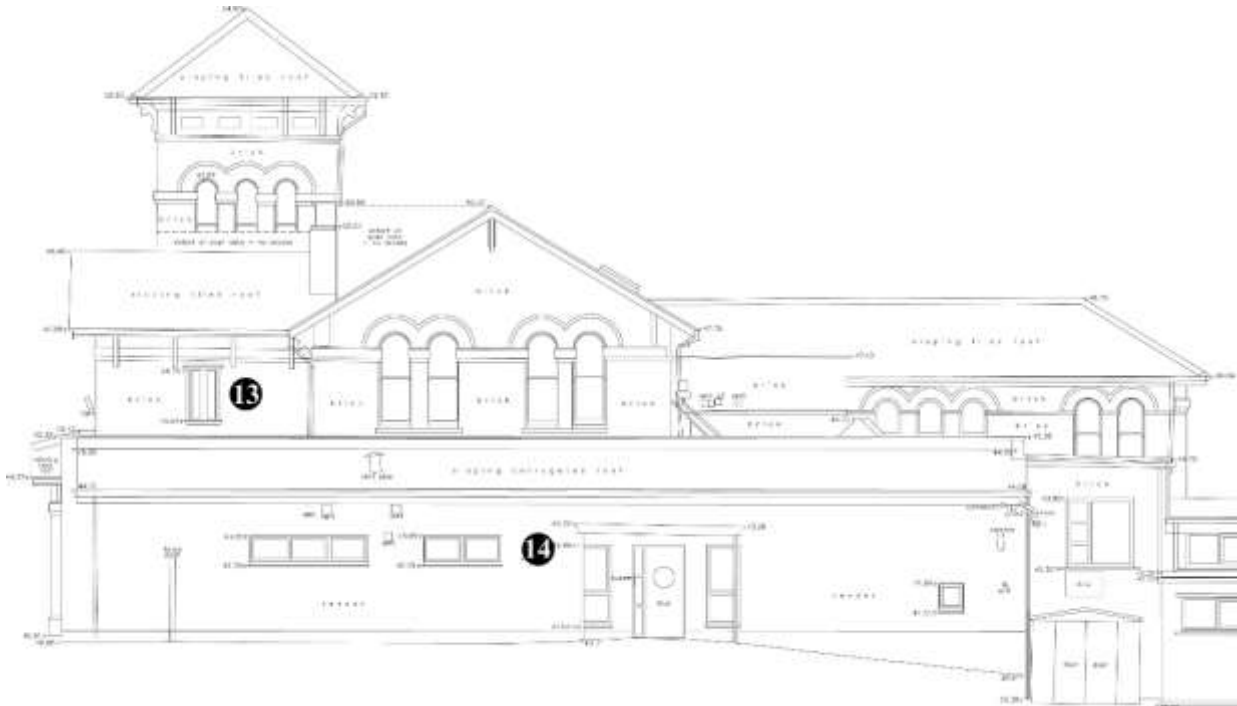


Figure 20: Eastern section of Elevation 1 Adapted from Drawing No. TS19_003S/7 provided by Curl la Tourelle Head Architecture

- (13) A prow window was inserted into the north-facing wall of Room AG (Finance Office). It does not appear to be replacing any original window and so is simply a later addition to the building. Its exact date is unclear.



Figure 21: Non-original, prow window protruding from Room AG

(14) This point references not the single storey building in the foreground, but the exterior wall of Room K which is part of the 1870s house.

Around one window in particular there are signs of modification.

Figure 23 shows:

- 1) Different coloured bricks and lighter coloured mortar.
- 2) Similarly shaped, but not original, white border to the brick lintel and clean, bright white lines etched into the brick.
- 3) Colour change between two areas, scratches and left over white mortar/plaster (fig.24).



Figure 22: North-facing façade of Victorian house, where it meets late 20th century glass frontage.



Figure 23: Features that suggest early 20th century, mushroom shaped extension covered this window.

- 6.7.2** These features correspond with cartographic evidence and suggest that the early 20th century mushroom-shaped extension extended around this window, so it became an internal, rather than external window. When the last remaining parts of this frontage were replaced (post 1997 OS Map), repairs were probably needed around this window, including perhaps removing internal plaster rendering.



Figure 24: Detailed view of point 3 in Figure 23: scratches and remnants of white mortar on the exterior wall

7 THE INTERIOR

- 7.1 The interior of 1 Morland Gardens will be discussed with reference to the following four figures adapted from drawings supplied by Curl la Tourelle Head Architecture. Rooms have been given new identification letters for the purposes of this report. However, where appropriate, their current function will also be mentioned. For example, Room O will also be referred to as the reception. Arrows also demonstrate the direction from which Figures 29 to 61 were taken.

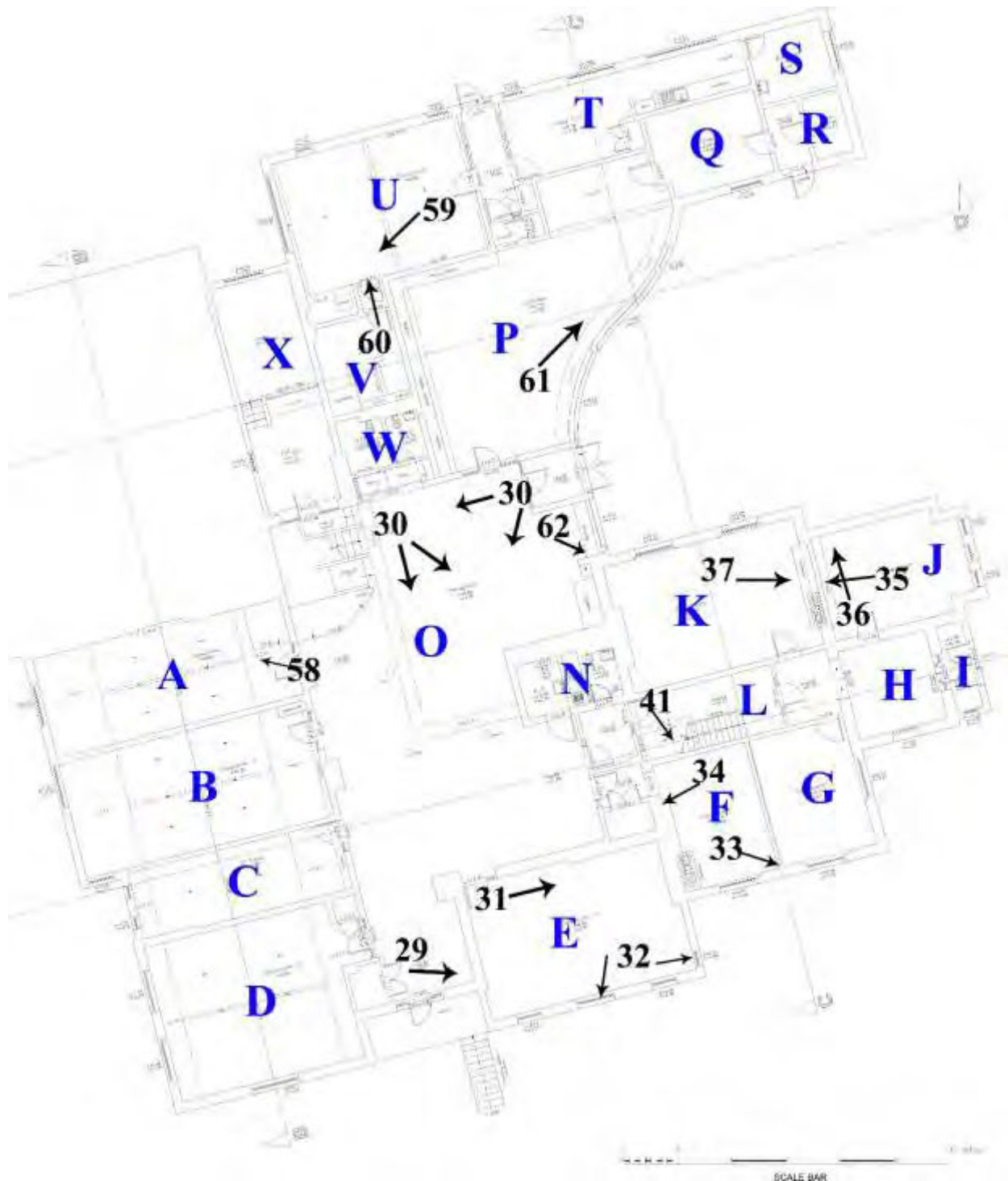


Figure 25: Key to room identification within this report. Upper Ground Floor. Adapted from Drawing No. TS19_003S/3 provided by Curl la Tourelle Head Architecture



Figure 26; Key to room identification within this report. First Floor. Adapted from Drawing No. TS19_003S/4 provided by Curl la Tourelle Head Architecture

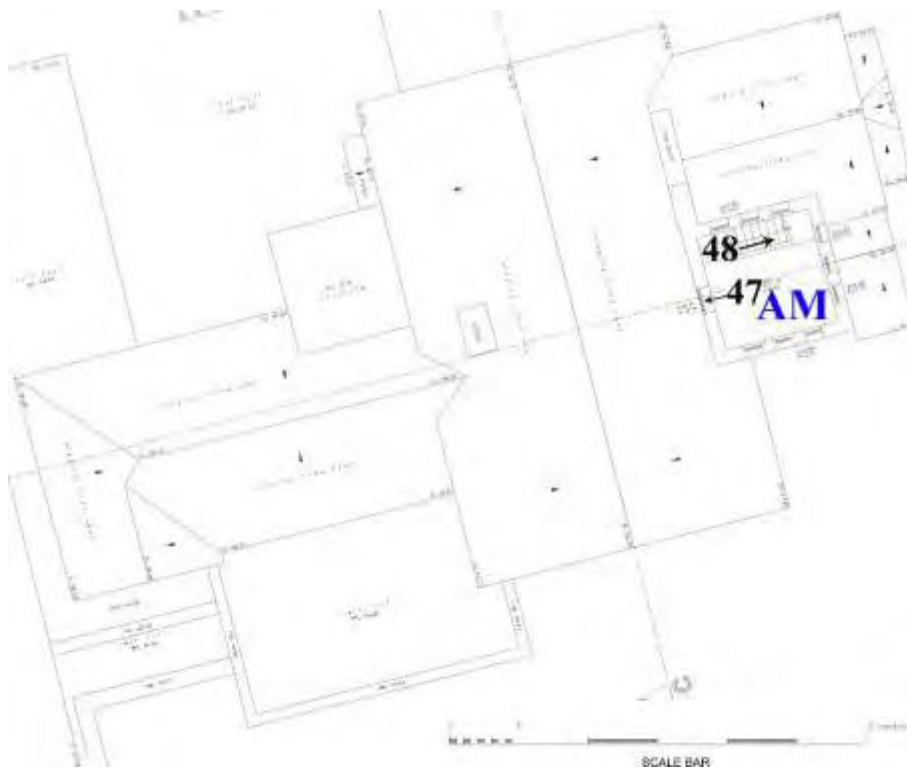


Figure 27; Key to room identification within this report. Second Floor. Adapted from Drawing No. TS19_003S/5 provided by Curl la Tourelle Head Architecture

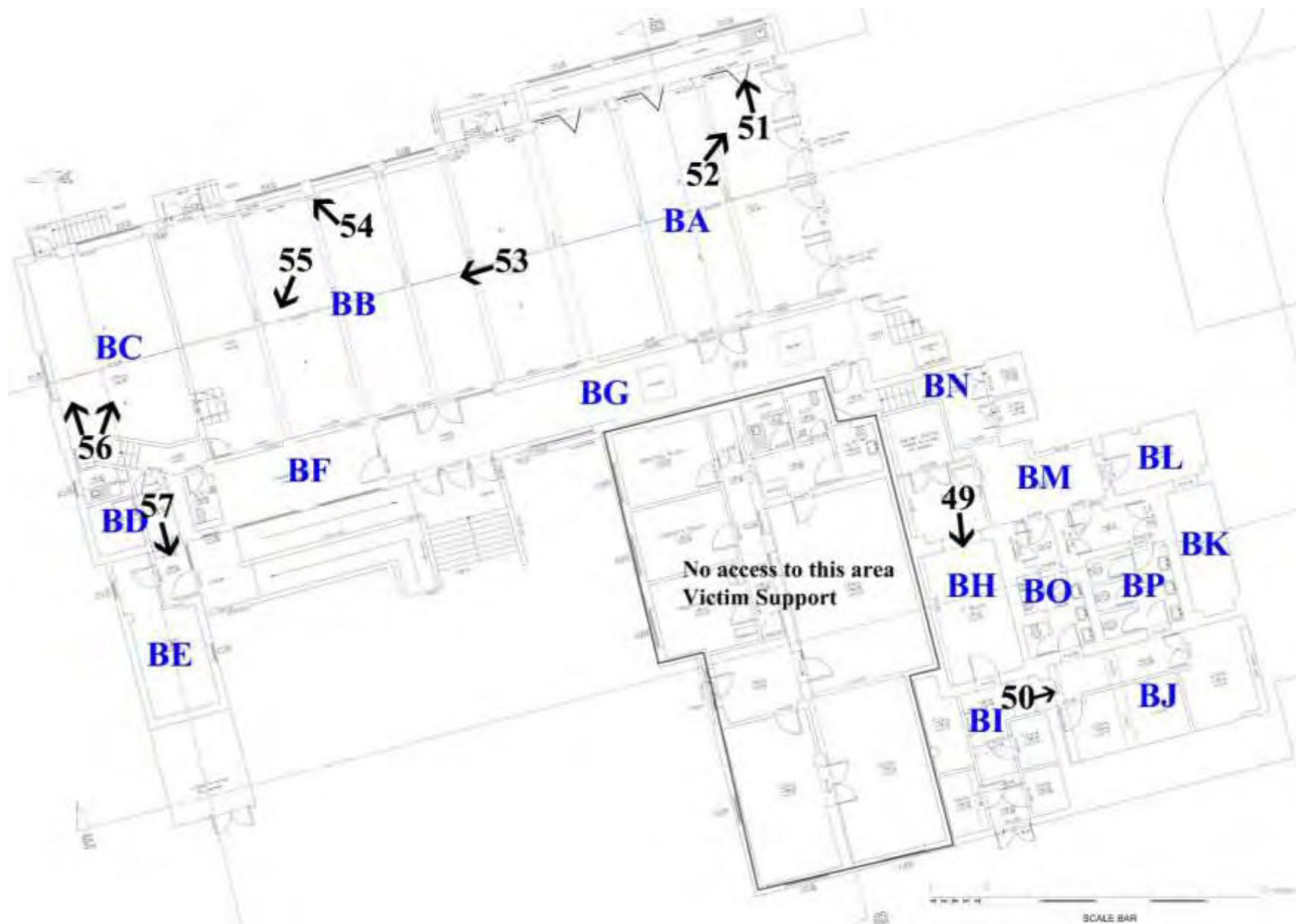


Figure 28: Key to room identification within this report. Lower Ground Floor. Adapted from Drawing No. TS19_003S/2 provided by Curl la Tourelle Head Architecture.

7.2 The heart of this building complex is Room O (fig. 30), which currently functions as the reception for the Adult Education Centre.

From within Room O structures can be seen that relate to the:

- original 1870s house (Rooms N and E, fig.25)
- 1926 bar extension

The four columns in Room O could still be related to the 1926 bar extension, for which we have planning application plans (fig. 29, also Appendix I). If not original structures, the columns were probably put in as structural support when the walls were taken down to allow access to later extensions. Two features jutting out from the western wall of Room O are also probably related to the bar extension (fig. 29). Point 2 on Figure 29 probably represents the boarded up remnants of the original 1870s external wall.

- small, SW extension (now between Rooms D and E, fig.25), which appeared between the 1915 and 1937 OS maps

There are three, antique radiators of the same make in Room O (Figure 29 nos. 3, 4 and 5). The location of one radiator (Figure 29 no.4) confirms the extension to the west of Room E took place relatively early on in the history of this building. However, as the western extension is not in the 1926 architect's plans, it suggests this heating configuration was set up post 1926.

- mushroom-shaped, 1926-1937 extension,

Room V (and possibly W) could still contain fabric from the extension which appeared to the north of the main house between the 1926 and 1937

- major redevelopment between the 1967 and 1975 OS maps (Rooms A-D, fig. 25)
- new glass frontage which was installed sometime after the 1997 OS map.

Mostly in Room P, the frontage continues into the NE corner of Room O.

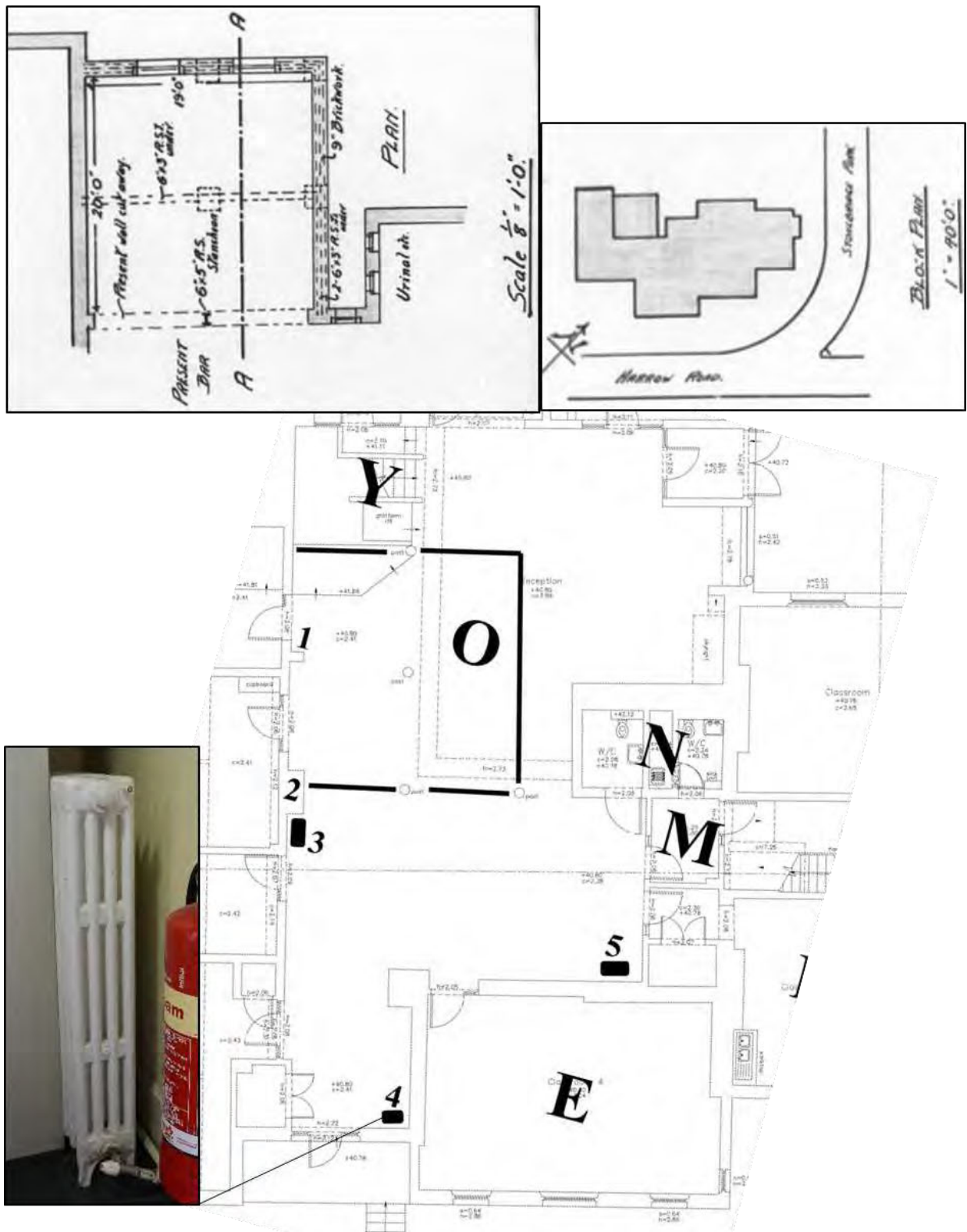


Figure 29: Features observed in Room O. Above: Extracts from 1926 planning permission documents for a bar extension. Below numbers 1, 2 and black square features associated with the 1926 bar; numbers 3, 4 and 5 are radiators. Partially adapted from Drawing No. TS19_003S/3 provided by Curl la Tourelle Head Architecture



Figure 30: Overview of Room O (the Reception). Clockwise from top left: looking SSW, looking WSW, looking ESE and looking SE.

7.3 FOCUS ON THE VICTORIAN HOUSE

Upper Ground floor

- 7.3.1** Room E. As with the exterior, the interior of Room E has seen episodes of modification which obscure its original function. Current modern panelling (related to the use of a digital projector) covers the NE corner of the room (fig.31). This obscures the only area of the room where a fireplace might have stood.

In the SW corner, the wall is slightly recessed with no obvious reason why. On the opposite wall (the SE corner) there is a window, but there is no evidence from the exterior or interior that there was a corresponding window in the SW corner.



Figure 31: Modern technical panelling and projectors

The window frame in the SE corner is clearly different to the other three windows, but whether this make it later or earlier in date is not clear (fig. 32). However, it further supports the idea that this room has been through multiple phases of development.



Figure 32: Window frame in the SE Corner (left) and the central window in the south-facing wall (right).

- 7.3.2** In general, the large ground floor rooms (E to L) within the 1870s house follow a similar decorative pattern. The skirting boards, hand and painting rails, parts of which could be original, late-19th century, are of a consistent style. Only Room F retains the ability to close its internal shutters, whilst the other rooms have had them fastened down or removed. Apart from the windows, there are few original interior design features. The chimney breasts are currently boarded up, so it is unknown whether any fireplaces survive.
- 7.3.3** It is very hard to be sure of the date of fixtures, such as painting rails, as they could have been part of later programmes of redecoration, perhaps during its transition from private house to public social club in the first quarter of the 20th century.

However, slight misalignments in these rails can tell us where later modifications were made. For example, a misalignment of both hand and painting rail in Room F, as well as the lack of a chimney in Room G, indicate that the dividing wall between rooms F and G is not original (fig. 33).

Moreover, a discontinuation of the skirting board and handrail in Room F indicate the current access point to Room F is later than the decoration scheme (fig. 34).

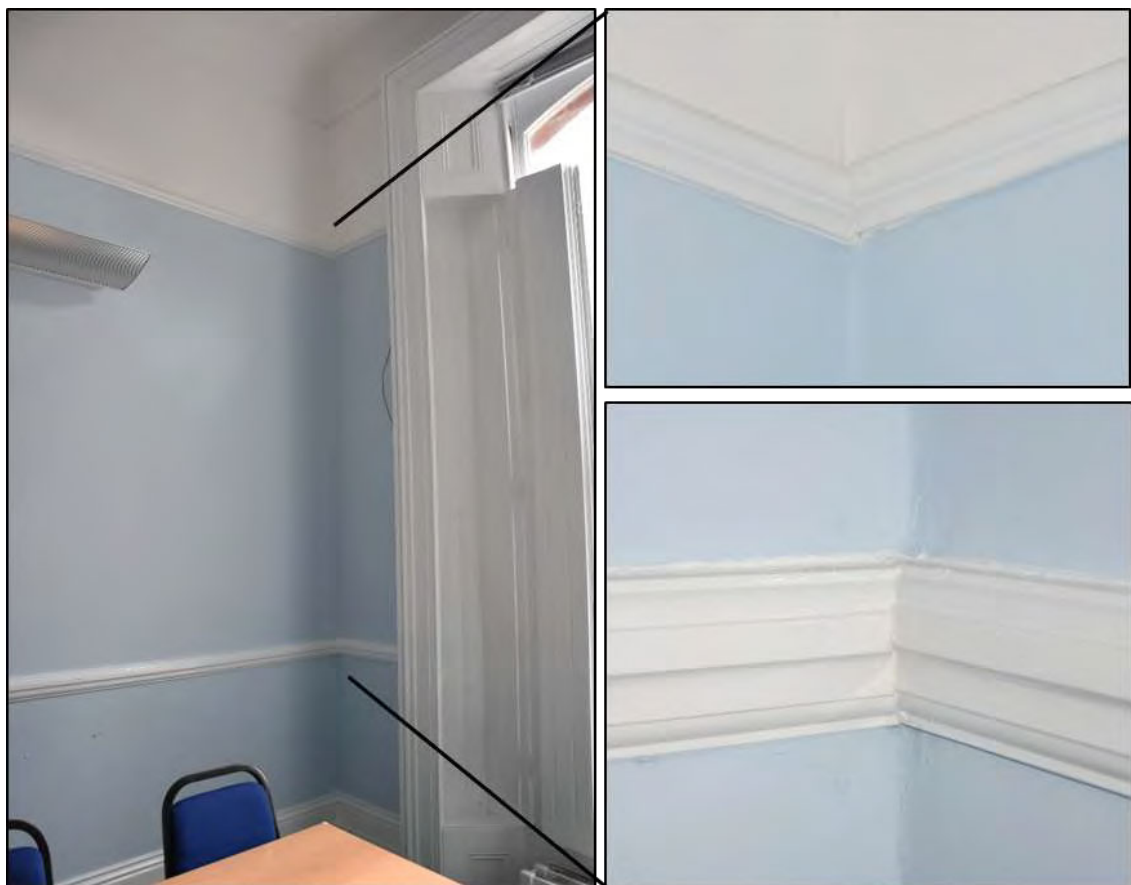


Figure 33: Misalignments of painting and hand rails in Room F.

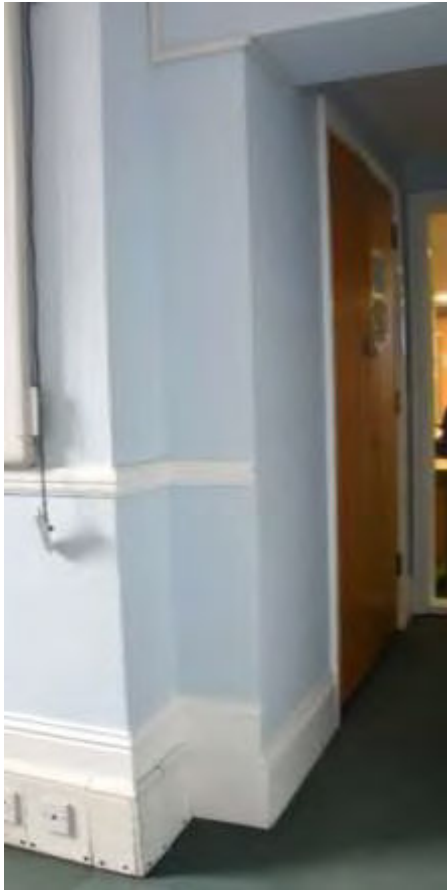


Figure 34: Discontinuation of skirting board and hand rail indicate current doorway into Room F is not original.

- 7.3.4** There is also clear evidence of alterations to the wall between Rooms J and K. An effort to knock through the wall and join up Rooms J and K has been subsequently reversed and a thin dividing wall erected (figs. 35-37). A comparison with the rooms above suggests that in knocking thorough the wall, a fireplace was removed (fig. 38).



Figure 35: Overhang into Room J. Looking west.



Figure 36: Overhang and dividing wall between Room J and K, as seen from within Room J looking NNW.



Figure 37: Dividing wall between Room J and K, as seen from Room K looking east.

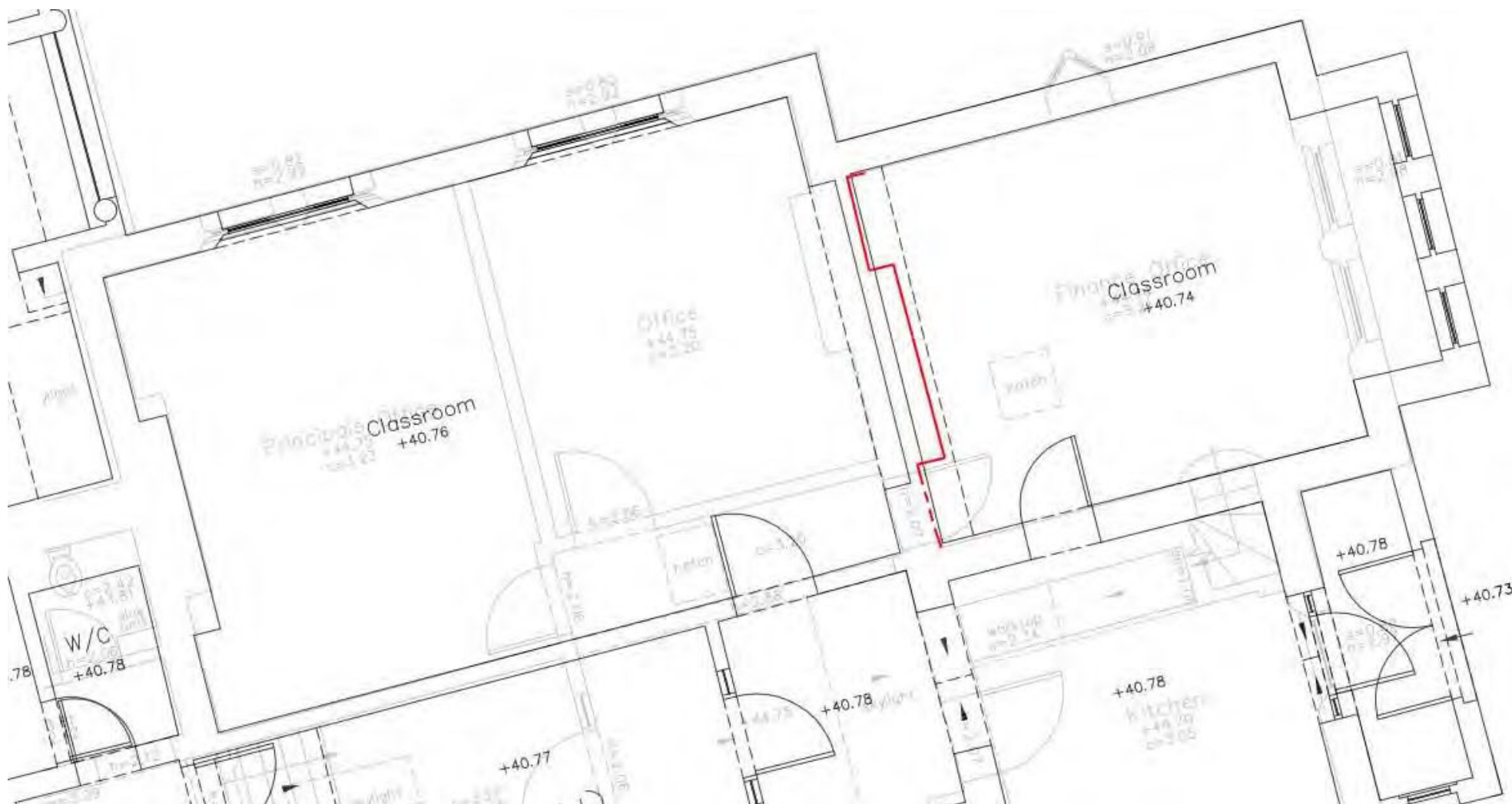


Figure 38: Plans of the upper ground and first floors overlaid to show where the chimney breast probably stood in Room J before it was removed. Adapted from Drawing No.s TS19_003S/3 and TS19_003S/4 provided by Curl la Tourelle Head Architecture.

First floor

- 7.3.5** On the first floor the rooms are smaller and seem to follow the originally intended layout. The doorframes are of a generally consistent style. The windows, again, seem to be original, apart from the prow window in Room AG (Finance Office), which is a later addition (fig.39).



Figure 39: Prow window in Room AG

- 7.3.6** The only example of original interior decoration on the first floor appears to be the moulded plaster corbels on the beam above the first flight of stairs in Room AK (fig.40).



Figure 40: Original plaster corbels

- 7.3.7** Inconsistencies in the fittings associated with the main staircase suggest it has been significantly reconfigured from the original, which no doubt stood in this place, but may have looked very different (fig. 41). The bird motif is probably very recent.



Figure 41: Main staircase as viewed from below in Room L.

- 7.3.8** The doorframes between Rooms AK and AL, and AL and AE are obviously different from the rest on the first floor. They are significantly wider, more appropriate for double doors, although, currently, there is only one door hung between AK and AL. Perhaps, this difference in doorframe style is to accommodate a two door design, rather than indicating they are later additions (fig.42).



Figure 42: Different style of doorframes. Room AE (left) and Room AF (right) both seen from Room AL.

7.3.9 The distribution of windows in the western projection of the first floor suggests the intention of four separate spaces: two rooms, one with an antechamber (Room AD), and a corridor. Therefore, the wall in Room AC (General Office), which currently survives only at half height, is likely to mark an original, full height corridor leading down to Room AB (fig. 43).

7.3.10 The position of the fireplace in Room AH and the need for easy access to Rooms AG, AH and AI (Principal's Office) from the central landing AL might suggest that the partition walls between Rooms AI and AH, and AH and AL are original. Although this leaves a strange-looking overhanging wall in AL (fig. 44) and makes the space wider than the rest of the hallway/stairs labelled AK.



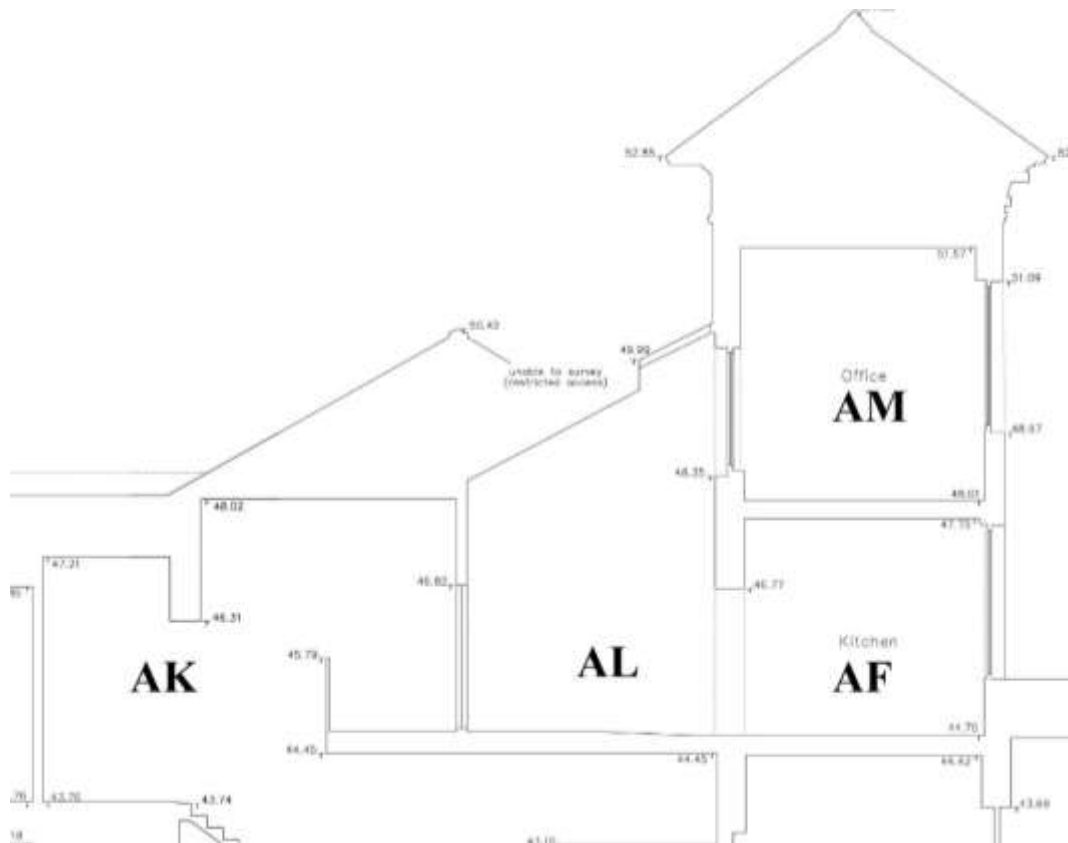
Figure 43: Wall surviving to half-height in Room AC.



Figure 44: Overhanging wall in the landing -Room AL

7.3.11 In many ways the central landing, labelled AL, is hard to understand and probably relates to multiple phases of modification. Best seen in section (fig. 45), the ceiling above AL currently slopes down from where it meets the tower. Where the two structures meet, there is a skylight and a large internal window, which means one can look down from the tower room AM in to AL. The overall shape of the roof suggests it should meet the tower just below the internal window in AM. The question, therefore, remains whether it originally did and whether the raised roof and skylight is a later modification.

7.3.12 In a certain light, faint lines showing through the wall paper in Room AL might correspond with this suggested, original, lower roof (fig. 46). Furthermore, this line meets a pilaster type structure which stops just below the internal window and on which a roof structure may have rested. If the roof did originally follow this line, the window between AL and AM would have been external.



7.3.13 The function and origin of the internal window between AM and AL (fig. 47) is unclear.

The window does not share any similarities with the other nine windows in Room AM. It is set on its own and lower down in the wall than the other windows (only approx. 30 cm above the current floor level of AM). At approximately 1.8 m long, it could be said to be an over-large window or a not large enough door. However, it could also have been enlarged from its original form, thereby obscuring its original purpose.

Further clarification of the relationship between these two rooms and how later modifications altered the original structure of the Victorian house could be gained from more destructive investigation. By which, the small-scale removal of plaster and window frames to reveal the exposed brickwork is meant.



Figure 47: Views of the window between the tower Room AM and landing Room AL

7.3.14 Room AG, the finance office, provides access to the tower room AM. The current stair case up to AM is not necessarily original and an extra sloping banister and safety wall have been added at a later date. The safety wall partially obscures the lower panelling of an east-facing window, but the floor level on the other side of the wall matches the bottom of the window panelling suggesting this was the intended floor level (fig. 48). It is possible that previous stairs came up through a smaller opening in the floor of AM, which did not obscure any panelling. However, it is not clear whether there was ever wooden panelling below the north-facing windows.



Figure 48: Safety wall obscuring panelling in the tower (Room AM).

Lower ground floor/ basement

- 7.3.15** The original 1870s house did have a lower ground, or basement, level underneath the western end of the house. This included Rooms BH – BL, BO and BP. Access to some areas was not possible during the photographic survey. Even when possible, the current use of many areas as storerooms meant it was hard to get a sense of the rooms and any original features may have been obscured (fig.49).
- 7.3.16** A probable feature of the original basement is the archway in BI (fig. 50). Part of the archway has been subsumed into a wall that runs roughly NE-SW. However, the position of the archway suggests it originally led into a large open space (BJ), which is currently partitioned into three different spaces. Given that this space had access to natural light and air through some half windows below Room E (fig. 13) it is likely that this space served as the kitchen. It is also likely that there was an entrance to the lower ground rooms from outside in this SW corner of the basement.



*Figure 49: The lower ground floor IT Room.
(Room BH) Looking SSW*



*Figure 50: Looking through an original archway towards
Room BJ*

- 7.3.17** In contrast, the small windowless rooms at the centre of the basement (Rooms BO and BP) were probably cold stores for food.
- 7.3.18** Room BL seems likely to have been part of the original basement lying underneath Rooms N, but it is less clear whether BN and BM are also part of the original basement configuration. They are located within the area into which the bar extended in 1926, but the extension plans do not show or propose any basemented rooms in this area. Furthermore, the staircase leading down to BN and BM protrudes into the upper ground floor area that would have been the new bar extension. This suggests the staircase was not there in the 1920s/30s, but is a later 20th century addition.

7.3.19 Unfortunately it was not possible to access the area of the basement occupied by the independent charity Victim Support.

7.4 THE WESTERN COMPLEX

7.4.1 The structures to the west of the original 1870s house, in other words the classrooms (Room A-D) and large halls (Room BA and BB), first appear clearly on the 1975 OS map. The large halls were built on virgin ground, but the classrooms may have been built out over the foundations of the Victorian stables.

7.4.2 The halls BA and BB seem to have been designed as a flexible space (figs. 52 and 53). Although, the extra storage space along the northern wall of BA, but not BB, suggests the space was also intended to function as two defined spaces (fig. 51).



Figure 51: Extra storage space in Room BA.

7.4.3 All the fire exits to the north, including the one backstage in Room BC, appear to be part of the original design. The wooden flooring could be original 1960s/70s, but the metal, corrugated roof is unlikely to be. A commemorative plaque on the wall in Room BB might give a clue as to when this roof, and the similar roof of Rooms A-D, was constructed. The plaque commemorates the opening of the site as an Adult Education Centre in 1996 (fig. 54). A new roof could be what was meant by ‘extensions and alterations’ in the 1994 building control application (see Appendix I).



Figure 52: Room BA, currently known as Hall 2.



Figure 53: Room BB, currently known as Hall 1



Figure 54: Commemorative plaque on the north wall of Room BB

- 7.4.4** Although the stage (Room BC) has now been partitioned off, it is clear that this space was designed to host theatrical performances (fig. 55). The stairs to the back-stage area and a number of small backstage rooms (e.g. Room BD) still remain. A very recent addition is the window on the west wall of BC, which, as well as a false ceiling, was put in with the conversion of the stage to an office (fig.56).



Figure 55: Blocked up stage viewed from Room BB

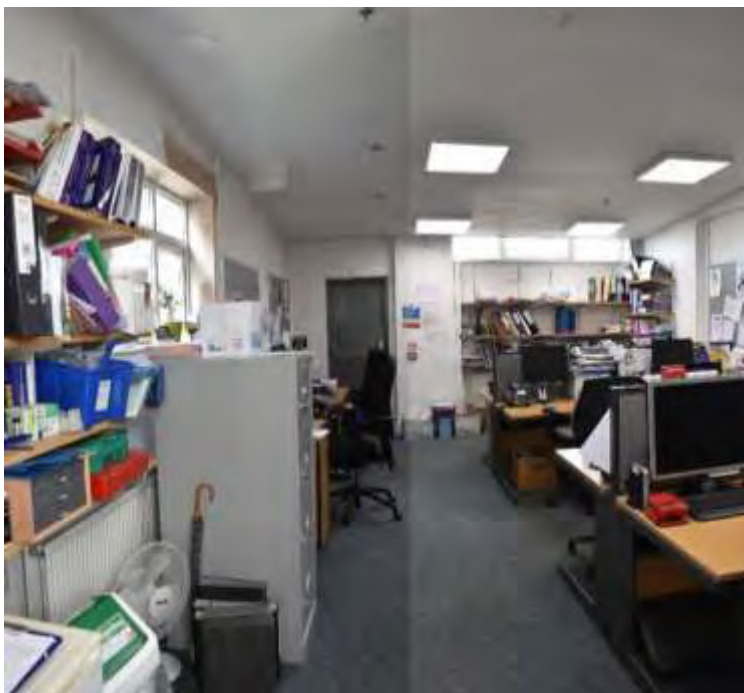


Figure 56: Room BC, the former stage, with window (left) put in within the last five years.

- 7.4.5** The change in floor level between Rooms BD and BE supports the cartographical evidence that Room BE was once a separate structure and later joined up to BD (fig. 57).
- 7.4.6** Room BF, which now acts as an office, appears just to be part of the corridor (BG) cordoned off. The conversion to office space has removed any evidence of whether there was previously access to the backstage rooms (BD) from the corridor.
- 7.4.7** An exterior outline which corresponds to the current outline of Rooms A-D (Classrooms 1-3 and an IT room) first appears on the 1975 OS map. This space was, therefore, built whilst the building was still a Services Rendered Club. However, the original use of this space has been obscured by later schemes of redecoration, which make these four rooms look very uniform. It is possible that during conversion to an Adult Education centre this space was subdivided, but there is very little clear evidence to confirm this.
- 7.4.8** Of note in Room A, is that part of the staircase down to the lower ground/ basement (Room BN) protrudes into the room (fig. 58). This feature continues out into Room O. Part of the northern wall of Room A is slightly recessed, but with no apparent purpose.
- 7.4.9** The dimensions of Room D (Classroom 3) respect the small extension to the west of Room E. However, it is unclear whether any of the fabric of this extension still remains within the eastern wall of Room D.



Figure 57: From outside Room BD looking down towards Room BE

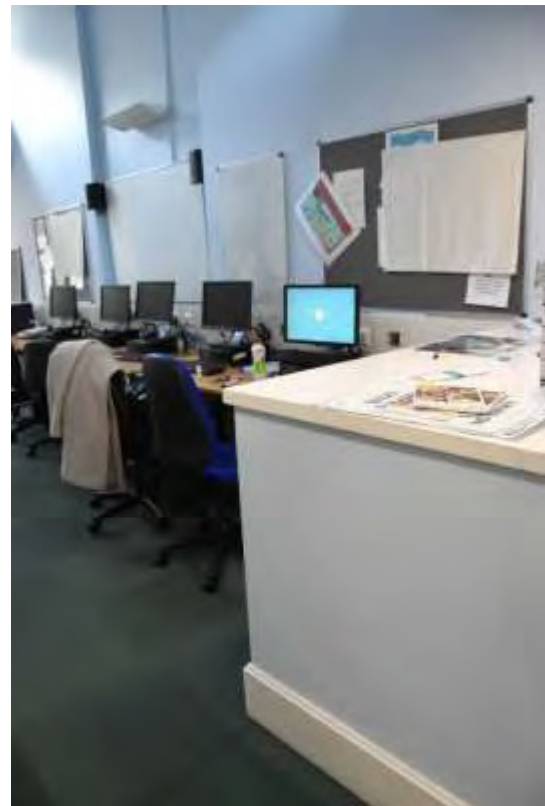


Figure 58: Boxed off area in Room A is the headspace for the staircase (Room BN) below.

7.5 THE NORTHERN COMPLEX

- 7.5.1** Rooms P to X include rooms currently used as a café, toilets, offices and the living flat. Rooms Q and R could not be accessed during the photographic survey. Three phases of development have taken place in this area: between 1926 and 1937, between 1967 and 1975, and post 1997. It is possible that remnants of the earliest phase still remain, although later development has significantly obscured the evidence.
- 7.5.2** As mentioned previously, the cartographical evidence suggests the 1960s/70s redevelopment of this area retained an older frontage, built at some point between 1926 and 1937. If the frontage was partially kept, perhaps other structures were retained. Whilst there is no clear evidence, the slight difference in floor level between Rooms U and V might indicate they are from different building phases (fig. 59 and 60). Room V, and possibly W, may have been rooms within the early 20th century, mushroom shaped extension.



Figure 59: Room U. Looking WSW



Figure 60: The floor in Room V, which is currently lower than the doorframes. Perhaps, the floor was lowered to match the level in Room U, which can be glimpsed under the door.

- 7.5.3** More recent redecoration of the living flat (Rooms S and T) has obscured any features that might indicate whether structures in Room T were retained from the early 20th century extension.
- 7.5.4** The curved glass frontage abuts Room Q at its northern end (fig.61). At its southern end, it meets the corner of the 1870s house and another masonry structure (fig.62). This projection may be a remnant of a wall associated with the 1926-1937 mushroom-shaped extension and retained to support the roof of Room O.



Figure 61: Glass frontage in Room P (the café) Looking NE



Figure 62: Where glass frontage meets Victorian house.

8 CONCLUSION

- 8.1** This building-complex retains features from several phases of development, most of which occurred as the building took on an increasingly public role.
- 8.2** This more public role started in the 1920s when the house was taken over by a members club, possibly associated with ex-service personnel after World War I. The first small additions to the footprint of the house (e.g. the 1926 bar extension) were soon overtaken by a large extension to the north, built between 1926 and 1937.
- 8.3** The footprint of the house and northern extension remained the same into the 1950s/60s.
- 8.4** However, by 1975 major new extensions to the west, and redevelopment of the northern extension had more or less given the building complex the footprint that it has today.
- 8.5** Later alterations in the mid-1990s did not significantly change the footprint, but probably rejuvenated interiors and roofs. These alterations have tried to make the complex of rooms a coherent space, but have also obscured many features which would have demonstrated its previous history. This is briefly summarised as follows:

Phase 1 (1873-1876)	Initial construction
Phase 2 (1876- c1920s)	Occupation as private house, minor alterations to southern frontage.
Phase 3 (1920s-1930s)	Taken over by private members club, associated northern extensions
Phase 4 (1960s/1970s)	Western and northern extensions, whilst still a Services Rendered Club
Phase 5 (1990s-present)	Alterations to create Adult Education Centre, and continued maintenance and redecoration

- 8.6** The original, 1870s, Victorian house has not been a private residence since about the 1920s and there are few internal features, apart from the windows and some plaster corbels, which are clearly original. Nevertheless, the original layout of the house is mostly reconstructable.
- 8.7** Since the 1920s two institutions, social and then educational, have modified the Victorian house for their own purposes. This has involved alternately subdividing and opening up spaces. It has also led to the situation where we have practically every phase of this building's development overlapping each other in the reception area (Room O).
- 8.8** Externally, the Victorian house remains mostly intact. Only the upper ground floor portion of the north wall which would have run through Room O and adjoined Room N is missing. The house's south-facing façade still makes an impression on those passing along Hillside. Although changes in the road layout mean the east-facing façade and original entrance is now slightly hidden. No trace of the original stables is in evidence today.

- 8.9** Whilst the exterior remains visually impressive, the interior has been thoroughly modified in the succeeding decades, leaving the house practically a shell.
- 8.10** In conclusion, the Victorian house at the heart of the present building complex is externally relatively intact, but internally unremarkable, having been modified often since the 1920s. It was built as a private house, but most features have been obscured or removed by its progressive transformation into an educational institution.

9 BIBLIOGRAPHY

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Appendix I

Figure 63: Extract from a tithe map of the parish of Willesden. Labelled in the National Archives catalogue as ‘Draft tithe map of the parish of Willesden, Middlesex. Drawn by H M Grellier, Surveyor. Signed by C Wood, Assistant Land Commissioner, 2 November 1886’. If it was drawn around 1886, there should be houses all along Stonebridge Park. The map also shows a railway company that went out of business in the 1870s, suggesting it might be an earlier revision than the current associated date of 1886 52

Figure 64: 1926 Planning Application for bar extension 53

Figure 65: 1926 Planning Application for bar extension 54

Figure 66: Decision letter relating to the creation of the Adult Education Centre. Unfortunately, the plans mentioned were no longer held by Brent planning department 55

Figure 67: Building control entry for the conversion to Adult Education Centre 56

Table 1: Detailed information on GLHER Monuments within 750m of 1 Morland Gardens

No.	Mon. UID	TQ Ref.	Description	References
Medieval (1066 AD -1539 AD)				
1	050359/00/00 - MLO280	2074 8329	Waxlow Road (Lower Place Farm) Moated site probably associated with the manor of East Twyford. Destroyed c 1890	Ordnance Survey Archaeological Record Card: Ordnance Survey. Ordnance Survey Card Index. TQ 28 SW 3 Unpublished document: West London Archaeological Field Group. SMR. M67. Article in monograph: Victoria County History. MIDDLESEX. P 10.
Medieval and post-medieval (1066 AD – 1900 AD)				
2	052835/00/00 - MLO68383	2144 8363	Harlesden manor. First mentioned pre 1215. There was a house on Lords' Croft at Harlesden Green by 17th century. A two roomed building by 1835, demolished c 1887. Harlesden Lodge built on site. Manor house was 2 storey, 4bay, timber framed and weather boarded farm.	Victoria County History. MIDDLESEX. P 211. West London Archaeological Field Group. SMR. M792.
3	054660/00/00 - MLO73251	2100 8450	A few cottages grouped around a rectory and vicarage	Article in monograph: Victoria County History. MIDDLESEX. P 189.
Post-medieval (1540 AD- 1900 AD)				
4	MLO67405	2060 8330	Canal feeder built by Grand Junction Canal Company, 1809 for the Brent Reservoir (see MLO67404). (1-3)	Database: GLIAS: FIRTH, W. BRENT OR WELSH HARP RESERVOIR. IRIS NUMBER: LO/GLIAS/WF7. Article in monograph: FAULKNER, A.H. THE GRAND JUNCTION CANAL. Article in monograph: DENNEY, M. LONDONS WATERWAYS.

5	MLO78491	20648 83916	Stonebridge Park Public House. Mid-19th century. A fine symmetrical public house This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.	Website: Historic England. 2015. The National Heritage List for England. www.historicengland.org.uk/listing/the-list/list-entry/1078882
6	MLO102914	20507 83846	Stonebridge School is a Grade II listed Primary School built in 1899-1900 by the Willesden School Board. It was designed by GET Laurence. This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.	Website: Historic England. 2015. The National Heritage List for England. www.historicengland.org.uk/listing/the-list.1393460
Modern (1901 AD – 2050 AD)				
7	MLO107320	20303 83911	Stonebridge Recreation Ground opened as a public park in 1902, and was subsequently enlarged in 1906 when new facilities were provided; an open air theatre was added in 1957 (no longer extant).	London Parks and Gardens Trust. 2007. London Parks and Gardens Trust Site Database. http://www.londongardensonline.org.uk.BRE034
8	MLO108812	2068 8425	Edgar Lee Home for Invalid Boys (14 Stonebridge Park) opened in 1919 for boys with heart disease and rheumatism. The patients were evacuated at the outbreak of WWII in 1939 and the Home never reopened.	Website: Chambers V. Lost Hospitals of London. http://ezitis.myzen.co.uk/index.html . Edgar Lee Home for Invalid Boys
Unknown and modern				
9	MLO107316	20634 84338	Stonebridge Park / Gloucester Close (The Old Orchard), Brent, NW10. The Old Orchard is former agricultural land, now an area of public open space surrounded by mid-20th century housing. It retains pear trees presumably from the former orchard, as well as birch and sycamore trees.	Ian Yarham, Meg Game 'Nature Conservation in Brent, Ecology Handbook 31', London Ecology Unit, 2000. Website: London Parks and Gardens Trust. 2007. London Parks and Gardens Trust Site Database. http://www.londongardensonline.org.uk.BRE021



Figure 63: Extract from a tithe map of the parish of Willesden. Labelled in the National Archives catalogue as 'Draft tithe map of the parish of Willesden, Middlesex. Drawn by H M Grellier, Surveyor. Signed by C Wood, Assistant Land Commissioner, 2 November 1886'. If it was drawn around 1886, there should be houses all along Stonebridge Park. The map also shows a railway company that went out of business in the 1870s, suggesting it might be an earlier revision than the current associated date of 1886.

A1173

No. _____ Date 3rd Aug 1926

Public Health
Act, 1875.
Willesden
Local Board
Act, 1887.

WILLESDEN DISTRICT COUNCIL, Town Hall, Dyne Road, Kilburn, N.W. 6.

Engineer's and Surveyor's Department.

BUILDINGS AND DRAINAGE.

The Application of J. L. L. L. L. for permission to erect
a bar extension to the present bar of the Willesden Club
situated at St. Mary's Park, Willesden, N.W.
and to be known or numbered as _____
Also to lay in accordance with the By-Laws and Regulations of the District Council
a _____ Drain from such proposed premises, as
shown on the plan left herewith, into the Sewer at _____
aforesaid.

The said Applicant undertakes to construct the entire Works and Drainage
of the Premises aforesaid to the satisfaction of the Surveyor to the said Council,
and to give written notice before the Buildings are commenced and the drains,
foundations, damp course and concrete over site are covered: also upon the completion
of any building. Notice forms for this purpose can be obtained at this office, gratis.
So much of the drainage as is constructed under the road will be laid by the Council's
Contractor at the Applicant's cost.

Name and Address of Owner Willesden Club
St. Mary's Park, N.W. 6
Name and Address of Builder W. L. L. L.
St. Mary's Park, Willesden N.W.
Signature and Address of Applicant J. L. L. L.
4 St. Mary's Park, N.W. 6

Applicants are informed that all plans for New Buildings intended for submission
to the Council should be delivered at the Surveyor's Office, not later than 4 o'clock p.m.
on Wednesday previous to the meeting of the Outdoor and Open Spaces Committee.

These particulars
are to be filled in by
District Surveyor.

Total Area of Building in Square Feet 1120
No. of Stories _____
Amount of Fees chargeable £ 17-6
Cubical Contents of Building 6250

Figure 64: 1926 Planning Application for bar extension

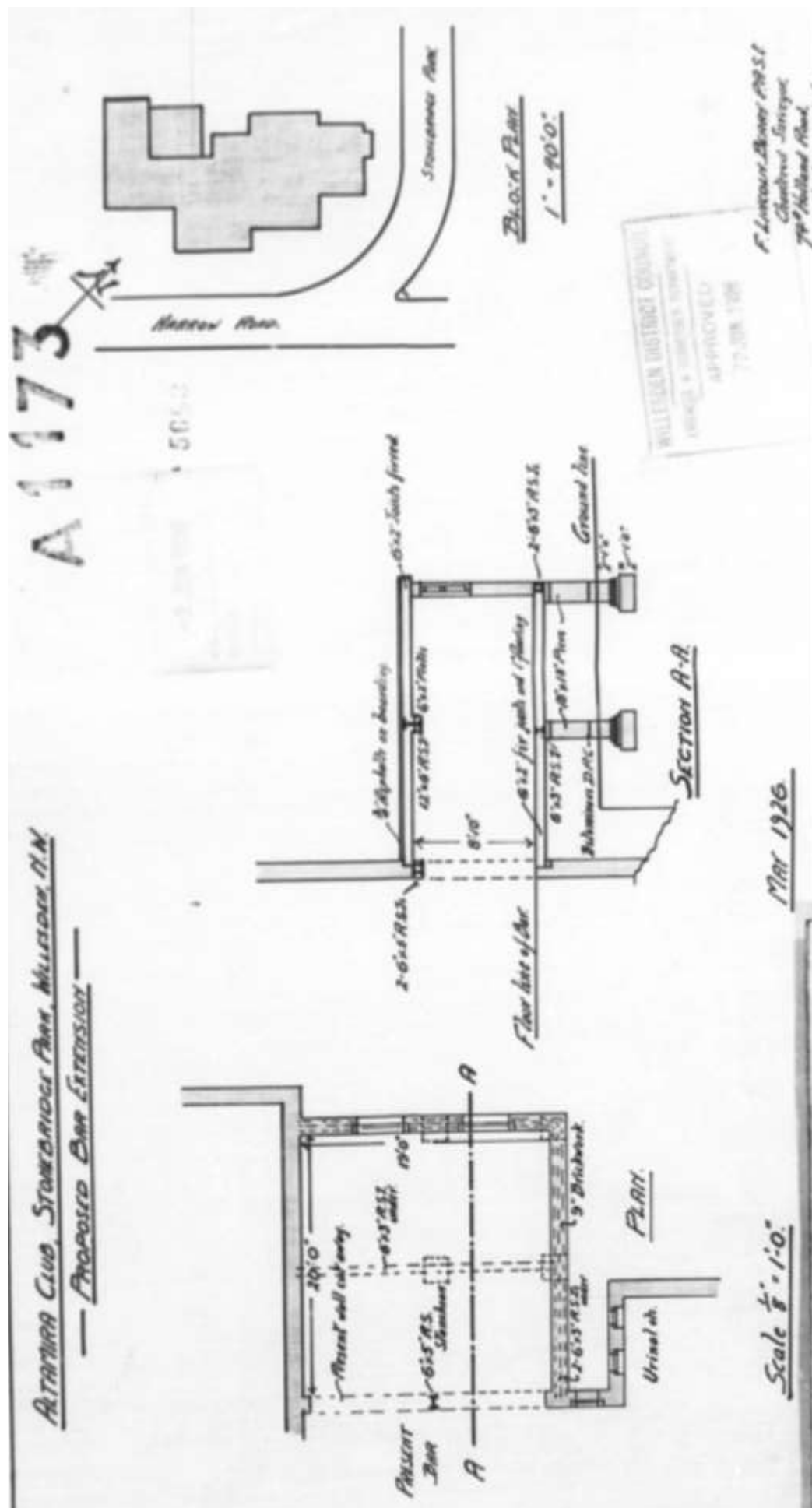


Figure 65: 1926 Planning Application for bar extension



**BRENT COUNCIL
TOWN & COUNTRY PLANNING ACT 1990**

DECISION NOTICE - APPROVAL

=====

To:

CHASSAY ARCHITECTS
90 WESTBOURNE TERRACE
LONDON
W2 6QE

APPLICATION NO: **93/1429L**

I refer to your application dated 16/09/93 accompanied by plans for CONVERSION OF SERVICES RENDERED CLUB INTO ADULT EDUCATION CENTRE FOR BRENT COUNCIL. (Plan Nos: BAC (SITE PLAN); 00A, 01A, 02A, 03A (EXISTING PLANS AND SECTIONS); T8, T9, T10, T11, T12, T13, T36 & T37 (PROPOSED PLANS AND ELEVATIONS).

at FORMER SERVICES RENDERED CLUB 1, MORLAND GARDENS,
LONDON, NW10.

The Council of the London Borough of Brent, the Local Planning Authority, hereby **GRANT PERMISSION** subject to the following condition and to the conditions set out on the attached Schedule B

CONDITION:1

The development to which this permission relates must be begun not later than the expiration of five years beginning with the date of this permission.

REASON:

To conform with the requirements of Section 91 of the Town and Country Planning Act 1990.

Date: 12th Jan 1994


 Signature: _____
 Director of Planning & Building Control

NOTES:

- (i) Attention is particularly drawn to Part I of Schedule A to this notice which sets out the rights of applicants who are aggrieved by the decisions of the Local Planning Authority.
- (ii) This decision does not purport to convey any approval or consent which may be required under the Building Regulations or under any enactment other than the Town & Country Planning Act 1990.

Figure 66: Decision letter relating to the creation of the Adult Education Centre. Unfortunately, the plans mentioned were no longer held by Brent planning department.

Summary

Description Of Works	EXTENSIONS & ALTERATIONS TO FORM COMMUNITY ADULT EDUCATION
Site Address	CENTRE 1 Morland Gardens, Stonebridge, NW10 8DY
Application Reference Number	RW/94/00005
Valid Date	Wed 05 Jan 1994
Decision Date	Tue 31 Mar 1998
Status	Building Work Started - Not completed

Further Information

Application Reference Number	RW/94/00005
Description Of Works	EXTENSIONS & ALTERATIONS TO FORM COMMUNITY ADULT EDUCATION
Agent Name	CENTRE CHASSAY ARCHITECTS
Ward	Not Available
Parish	Not Available
Decision	Pass plans unconditionally, all types
Status	Building Work Started - Not completed

Plots

Plot Commencement Date	24 Jan 1994
Plot Completion Date	Not Available
Plot Address	Not Available

Important Dates

Application Received	Wed 05 Jan 1994
Application Deposited	Wed 05 Jan 1994
Decision Date	Tue 31 Mar 1998
Application Commencement Date	Mon 24 Jan 1994
Application Completion Date	Not Available

https://pa.brent.gov.uk/online-applications/buildingControlDetails.do?activeTab=printPreview&keyVal=BCAPR_10016

Figure 67: Building control entry for the conversion to Adult Education Centre

Appendix II

Figure 68:	Plaque found just inside current entrance to 1 Morland Gardens	58
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Figure 68: Plaque found just inside current entrance to 1 Morland Gardens



Figure 69: Plaque also found just inside current entrance to 1 Morland Gardens.



Figure 70: Examples of brickwork. Clockwise from top left: Victorian house with Flemish bond; 1960/70s corridor alongside hall with stretcher bond and Flemish bond; lower ground floor area occupied by Victim Support with stretcher bond.



Figure 71: Room E, looking SE



Figure 72: Room F, looking S



Figure 73: Room L, looking NE



Figure 74: Room G, looking S



Figure 75: From Room H, looking W



Figure 76: From Room H, looking E at the original front door



Figure 77: Room J, looking NE



Figure 78: Room AK, looking W



Figure 79: Room AC, looking NW



Figure 80: Room AB, looking SW



Figure 81: Room AK, looking NE



Figure 82: Room AI, looking NW



Figure 83: Room AE, looking SW



Figure 84: Room AF, looking NE



Figure 85: Room AG, looking NE



Figure 86: Room AG, looking S



Figure 87: Room AM, looking SE



Figure 88: Room AH, looking NE

[REDACTED]

From: planningsupport@london.gov.uk
Sent: 18 February 2020 16:05
To: [REDACTED] [REDACTED] [REDACTED]@brent.gov.uk
Subject: GLA 5444 - 1 Morland Gardens

Dear [REDACTED] [REDACTED]

Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008.

Site name: 1 Morland Gardens
Address: 1 Morland Gardens , London , NW10 8DY
GLA case number: 5444
Local planning authority reference: 20/0345

Thank you for consulting the Mayor of London in respect of the above application of potential strategic importance, which your Council validated on **3 February 2020**.

Under Article 4(2) of the above Order the Mayor has six weeks from the date of validation by the GLA to provide a statement setting out whether he considers the application complies with his London Plan and his reasons for taking that view.

I hereby give notice that your letter was received on **05 February 2020** and validated on **06 February 2020**, therefore the six week period will terminate on **18 March 2020**.

The application has been allocated to [REDACTED] [REDACTED] who can be reached on 020 7983 [REDACTED] or email [REDACTED]@london.gov.uk

Yours sincerely

[REDACTED] [REDACTED]
Development Management
Greater London Authority

[REDACTED]

From: [REDACTED] <[REDACTED]@brent.gov.uk>
Sent: 21 February 2020 11:28
To: [REDACTED]
Cc: Planning Support
Subject: RE: GLA 5444 - 1 Morland Gardens
Attachments: 5740 Morland Gardens Planning statement 21-02-2020.pdf

Dear [REDACTED]
Further to the below, I attach a copy of a slightly revised Planning Statement which was submitted to us. The revised statement clarifies (section 5.7) that the scheme would provide 100% affordable social rented units, rather than the 70:30 social: intermediate split which was previously advised. Please contact me if there are any further queries.

Regards,
[REDACTED]
Principal Planning Officer
North Area Development Management Team
Planning and Regeneration
Brent Council

[REDACTED] / [REDACTED]
www.brent.gov.uk



From: planningsupport@london.gov.uk <planningsupport@london.gov.uk>
Sent: 18 February 2020 16:05
To: [REDACTED]@london.gov.uk; [REDACTED] <[REDACTED]@brent.gov.uk>
Subject: GLA 5444 - 1 Morland Gardens

Dear [REDACTED]

Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008.

Site name: 1 Morland Gardens
Address: 1 Morland Gardens , London , NW10 8DY
GLA case number: 5444
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Yours sincerely

[REDACTED] [REDACTED]
Development Management
Greater London Authority

#LondonIsOpen

[REDACTED]

From: planningsupport@london.gov.uk
Sent: 09 March 2020 16:33
To: [REDACTED] spatialplanning@tfl.gov.uk; Andrew Boff; PCU@communities.qsi.gov.uk; Lucinda Turner; [REDACTED]
Subject: GLA 5444 - 1 Morland Gardens
Attachments: 5444 stage 1 letter and report.pdf

Dear all

Please find the attached decision letter & report relating to the above application.

Regards

[REDACTED]

GLA Planning Support Team

[REDACTED]

From: [REDACTED] <[REDACTED]@brent.gov.uk>
Sent: 11 March 2020 11:38
To: [REDACTED]
Subject: RE: GLA 5444 - 1 Morland Gardens

Hi [REDACTED]
I'm just checking when you expect to issue the Stage 1 report on the above? Are there any immediate issues you could make us aware of?

Regards,

[REDACTED]
Principal Planning Officer
North Area Development Management Team
Planning and Regeneration
Brent Council

[REDACTED] / [REDACTED]
www.brent.gov.uk



From: [REDACTED]
Sent: 24 February 2020 10:25
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: GLA 5444 - 1 Morland Gardens
Thanks [REDACTED]

[REDACTED]
Principal Planning Officer
North Area Development Management Team
Planning and Regeneration
Brent Council

[REDACTED] / [REDACTED]
www.brent.gov.uk



From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 24 February 2020 09:31
To: [REDACTED] <[REDACTED]@brent.gov.uk>
Cc: Planning Support <planningsupport@london.gov.uk>
Subject: RE: GLA 5444 - 1 Morland Gardens

Dear [REDACTED]
Thank you for your email. I'll make sure to refer to the revised statement in my report.
Many thanks,

[REDACTED]
Senior Strategic Planner, Development Management, Planning

GREATER LONDON AUTHORITY

City Hall, The Queen's Walk, London SE1 2AA

020 7983 [REDACTED]

www.london.gov.uk/what-we-do/planning

[REDACTED] london.gov.uk

From: [REDACTED] <[REDACTED]@brent.gov.uk>

Sent: 21 February 2020 11:28

To: [REDACTED] <[REDACTED]@london.gov.uk>

Cc: Planning Support <planningsupport@london.gov.uk>

Subject: RE: GLA 5444 - 1 Morland Gardens

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Please contact me if there are any further queries.

Regards,

[REDACTED]

Principal Planning Officer
North Area Development Management Team
Planning and Regeneration
Brent Council

[REDACTED] / [REDACTED]

www.brent.gov.uk



From: planningsupport@london.gov.uk <planningsupport@london.gov.uk>

Sent: 18 February 2020 16:05

To: [REDACTED] [\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk); [REDACTED] <[REDACTED]@brent.gov.uk>

Subject: GLA 5444 - 1 Morland Gardens

Dear [REDACTED]

**Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007;
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Site name: 1 Morland Gardens

Address: 1 Morland Gardens , London , NW10 8DY

GLA case number: 5444

Local planning authority reference: 20/0345

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The application has been allocated to [REDACTED] [REDACTED] who can be reached on 020 7983 [REDACTED] or email [REDACTED] [\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)

Yours sincerely

[REDACTED] [REDACTED]

Development Management
Greater London Authority

#LondonIsOpen

[REDACTED]

From: [REDACTED]
Sent: 16 March 2020 12:21
To: [REDACTED]
Subject: RE: GLA 5444 - 1 Morland Gardens
Attachments: 5444 stage 1 letter and report.pdf

Hi [REDACTED]

Sorry this should have been issued to you last week through Planning Support – I was on leave so was unable to check.

Please see attached. The main issues relate to people moving in and out of the college, affordable workspace policy justification and energy matters.

Many thanks,

[REDACTED]

[REDACTED]

Senior Strategic Planner, Development Management, Planning

GREATERLONDONAUTHORITY

City Hall, The Queen's Walk, London SE1 2AA

020 7983 [REDACTED]

www.london.gov.uk/what-we-do/planning

[REDACTED] london.gov.uk

From: [REDACTED] <[REDACTED]@brent.gov.uk>
Sent: 11 March 2020 11:38
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: GLA 5444 - 1 Morland Gardens

Hi [REDACTED]

I'm just checking when you expect to issue the Stage 1 report on the above? Are there any immediate issues you could make us aware of?

Regards,

[REDACTED]

Principal Planning Officer
North Area Development Management Team
Planning and Regeneration
Brent Council

[REDACTED] / [REDACTED]

www.brent.gov.uk



From: [REDACTED]
Sent: 24 February 2020 10:25
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: GLA 5444 - 1 Morland Gardens

Thanks [REDACTED]

[REDACTED]
Principal Planning Officer
North Area Development Management Team
Planning and Regeneration
Brent Council

[REDACTED] / [REDACTED]
www.brent.gov.uk



From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 24 February 2020 09:31
To: [REDACTED] <[REDACTED]@brent.gov.uk>
Cc: Planning Support <planningsupport@london.gov.uk>
Subject: RE: GLA 5444 - 1 Morland Gardens

Dear [REDACTED]

Thank you for your email. I'll make sure to refer to the revised statement in my report.

Many thanks,

[REDACTED]

[REDACTED]

Senior Strategic Planner, Development Management, Planning
GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA
020 7983 [REDACTED]

www.london.gov.uk/what-we-do/planning

[REDACTED] london.gov.uk

From: [REDACTED] <[REDACTED]@brent.gov.uk>
Sent: 21 February 2020 11:28
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: Planning Support <planningsupport@london.gov.uk>
Subject: RE: GLA 5444 - 1 Morland Gardens

Dear [REDACTED]

Further to the below, I attach a copy of a slightly revised Planning Statement which was submitted to us. The revised statement clarifies (section 5.7) that the scheme would provide 100% affordable social rented units, rather than the 70:30 social: intermediate split which was previously advised.

Please contact me if there are any further queries.

Regards,

[REDACTED]
Principal Planning Officer
North Area Development Management Team
Planning and Regeneration
Brent Council

[REDACTED] / [REDACTED]
www.brent.gov.uk



From: planningsupport@london.gov.uk <planningsupport@london.gov.uk>
Sent: 18 February 2020 16:05
To: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@brent.gov.uk>
Subject: GLA 5444 - 1 Morland Gardens

Dear [REDACTED]

Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008.

Site name: 1 Morland Gardens
Address: 1 Morland Gardens , London , NW10 8DY
GLA case number: 5444
Local planning authority reference: 20/0345

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I hereby give notice that your letter was received on **05 February 2020** and validated on **06 February 2020**, therefore the six week period will terminate on **18 March 2020**.

The application has been allocated to [REDACTED] [REDACTED] who can be reached on 020 7983 [REDACTED] or email [REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk)

Yours sincerely

[REDACTED]
Development Management
Greater London Authority

#LondonIsOpen

[REDACTED]

From: [REDACTED]
Sent: 11 June 2020 16:37
To: [REDACTED]
Subject: RE: GLA 5444 - 1 Morland Gardens

Hi [REDACTED]

Thanks for your email. I have received the applicant's response and am downloading the documents now. I'll come back to you and the applicant as soon as I can with a response, noting the committee dates below.

Many thanks,

[REDACTED]

[REDACTED]

Senior Strategic Planner, Development Management, Planning
GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA

[REDACTED]
020 7983 [REDACTED]

Please contact my mobile in the first instance.

[REDACTED] [london.gov.uk](https://www.london.gov.uk)
www.london.gov.uk/what-we-do/planning

From: [REDACTED] <[REDACTED]@brent.gov.uk>
Sent: 10 June 2020 12:05
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: GLA 5444 - 1 Morland Gardens

Hi [REDACTED]

Just to confirm that we have received revised documents in order to address GLA's initial comments at Stage 1. I will ask the planning consultant to send a WeTransfer link to access these documents directly, as some of the documents are very large files. At this stage, we are targeting a committee date of 22nd July, with a fallback of August 12th.

Please contact me if you have any further queries.

Regards,

[REDACTED]
Principal Planning Officer
North Area Development Management Team
Regeneration and Environment
Brent Council

[REDACTED] / [REDACTED]
www.brent.gov.uk



From: [REDACTED]
Sent: 18 May 2020 12:30
To: [REDACTED] <[REDACTED][london.gov.uk](mailto:[REDACTED@london.gov.uk])>; [REDACTED][tibbalds.co.uk](mailto:[REDACTED@tibbalds.co.uk])
Subject: RE: GLA 5444 - 1 Morland Gardens

Hi [REDACTED]

Apologies for the delay coming back. At the moment we're still waiting for amendments in relation to some of the highways concerns raised both by you/ Transport for London at Stage 1, and our own highways officers. I would anticipate these being received in the next 1-2 weeks and being able to issue a revised set of drawings then. At the moment there is also no provisional Committee date.

Please contact me if you have any further queries.

Regards,

[REDACTED]
Principal Planning Officer
North Area Development Management Team
Regeneration and Environment
Brent Council

[REDACTED] / [REDACTED]
www.brent.gov.uk



From: [REDACTED] <[REDACTED][london.gov.uk](mailto:[REDACTED@london.gov.uk])>
Sent: 18 May 2020 12:16
To: [REDACTED] <[REDACTED][brent.gov.uk](mailto:[REDACTED@brent.gov.uk])>; [REDACTED][tibbalds.co.uk](mailto:[REDACTED@tibbalds.co.uk])
Subject: RE: GLA 5444 - 1 Morland Gardens

Hi [REDACTED] and [REDACTED]

I hope you are both well. Could you please update me on progress on this case?

Many thanks,

[REDACTED]

[REDACTED]

Senior Strategic Planner, Development Management, Planning
GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA

020 7983 [REDACTED]

Please contact my mobile in the first instance.

[REDACTED] [london.gov.uk](https://www.london.gov.uk)
www.london.gov.uk/what-we-do/planning

From: [REDACTED]
Sent: 24 April 2020 09:59
To: [REDACTED] <[REDACTED]@brent.gov.uk>; [REDACTED]@tibbalds.co.uk'
<[REDACTED]@tibbalds.co.uk>
Subject: RE: GLA 5444 - 1 Morland Gardens

Hi [REDACTED] and [REDACTED]

I hope you're both well.

Would you be able to give me an update on this case please? I haven't had any response to the Stage 1 report and it would also be helpful to know when this case is going to committee (considering the challenges the pandemic has raised).

I have also attached the GLA's technical reports for this case on energy, water and air quality. The response to the energy matters should be made within the energy spreadsheet.

Many thanks,

[REDACTED]

[REDACTED]

Senior Strategic Planner, Development Management, Planning
GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA

020 7983 [REDACTED]

Please contact my mobile in the first instance.

[REDACTED] [london.gov.uk](https://www.london.gov.uk)
www.london.gov.uk/what-we-do/planning

From: [REDACTED]
Sent: 16 March 2020 12:21

To: [REDACTED] [REDACTED] <[REDACTED]@brent.gov.uk>
Subject: RE: GLA 5444 - 1 Morland Gardens

Hi [REDACTED]

Sorry this should have been issued to you last week through Planning Support – I was on leave so was unable to check.

Please see attached. The main issues relate to people moving in and out of the college, affordable workspace policy justification and energy matters.

Many thanks,

[REDACTED]

[REDACTED] [REDACTED]

Senior Strategic Planner, Development Management, Planning

GREATERLONDONAUTHORITY

City Hall, The Queen's Walk, London SE1 2AA

020 7983 [REDACTED]

www.london.gov.uk/what-we-do/planning

[REDACTED] london.gov.uk

From: [REDACTED] [REDACTED] <[REDACTED]@brent.gov.uk>

Sent: 11 March 2020 11:38

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Subject: RE: GLA 5444 - 1 Morland Gardens

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Regards,

[REDACTED] [REDACTED]

Principal Planning Officer
North Area Development Management Team
Planning and Regeneration
Brent Council

[REDACTED] / [REDACTED]

www.brent.gov.uk



From: [REDACTED]
Sent: 24 February 2020 10:25
To: [REDACTED] <[REDACTED][london.gov.uk](mailto:[REDACTED]@london.gov.uk)>
Subject: RE: GLA 5444 - 1 Morland Gardens

Thanks [REDACTED]

[REDACTED]
Principal Planning Officer
North Area Development Management Team
Planning and Regeneration
Brent Council

[REDACTED] / [REDACTED]
www.brent.gov.uk



From: [REDACTED] <[REDACTED][london.gov.uk](mailto:[REDACTED]@london.gov.uk)>
Sent: 24 February 2020 09:31
To: [REDACTED] <[REDACTED][brent.gov.uk](mailto:[REDACTED]@brent.gov.uk)>
Cc: Planning Support <planningsupport@london.gov.uk>
Subject: RE: GLA 5444 - 1 Morland Gardens

Dear [REDACTED]

Thank you for your email. I'll make sure to refer to the revised statement in my report.

Many thanks,

[REDACTED]

[REDACTED]

Senior Strategic Planner, Development Management, Planning
GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA
020 7983 [REDACTED]

www.london.gov.uk/what-we-do/planning
[REDACTED][london.gov.uk](mailto:[REDACTED]@london.gov.uk)

From: [REDACTED] <[REDACTED][brent.gov.uk](mailto:[REDACTED]@brent.gov.uk)>
Sent: 21 February 2020 11:28
To: [REDACTED] <[REDACTED][london.gov.uk](mailto:[REDACTED]@london.gov.uk)>
Cc: Planning Support <planningsupport@london.gov.uk>
Subject: RE: GLA 5444 - 1 Morland Gardens

Dear [REDACTED]

Further to the below, I attach a copy of a slightly revised Planning Statement which was submitted to us. The revised statement clarifies (section 5.7) that the scheme would provide 100% affordable social rented units, rather than the 70:30 social: intermediate split which was previously advised.

Please contact me if there are any further queries.

Regards,

[REDACTED]
Principal Planning Officer
North Area Development Management Team
Planning and Regeneration
Brent Council

[REDACTED] / [REDACTED]
www.brent.gov.uk



From: planningsupport@london.gov.uk <planningsupport@london.gov.uk>
Sent: 18 February 2020 16:05
To: [REDACTED] [\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk); [REDACTED] [REDACTED] <[\[REDACTED\]@brent.gov.uk](mailto:[REDACTED]@brent.gov.uk)>
Subject: GLA 5444 - 1 Morland Gardens

Dear [REDACTED] [REDACTED]

Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008.

Site name: 1 Morland Gardens
Address: 1 Morland Gardens , London , NW10 8DY
GLA case number: 5444
Local planning authority reference: 20/0345

Thank you for consulting the Mayor of London in respect of the above application of potential strategic importance, which your Council validated on **3 February 2020**.

Under Article 4(2) of the above Order the Mayor has six weeks from the date of validation by the GLA to provide a statement setting out whether he considers the application complies with his London Plan and his reasons for taking that view.

I hereby give notice that your letter was received on **05 February 2020** and validated on **06 February 2020**, therefore the six week period will terminate on **18 March 2020**.

The application has been allocated to [REDACTED] [REDACTED] who can be reached on 020 7983 [REDACTED] or email [REDACTED] [\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)

Yours sincerely



Development Management
Greater London Authority

#LondonIsOpen

[REDACTED]

From: [REDACTED]
Sent: 29 June 2020 10:12
To: [REDACTED]
Subject: RE: Morland Gardens Planning Response
Attachments: 5444 1 Morland Gardens GLA Consultation (post stage I) - Energy Memo.xlsx; 5444 Post Stage 1 GLA officer comments.pdf

Hi [REDACTED] and [REDACTED]

Please find attached the further comments from the GLA and TfL on this case and the further energy comments. Please let me know if you have any questions.

Many thanks,

[REDACTED]

[REDACTED]

Senior Strategic Planner, Development Management, Planning
GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA

[REDACTED]

020 7983 [REDACTED]

Please contact my mobile in the first instance.

[REDACTED] [london.gov.uk](https://www.london.gov.uk)
www.london.gov.uk/what-we-do/planning

From: [REDACTED] <[REDACTED]@tibbalds.co.uk>
Sent: 22 June 2020 11:55
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: Re: Morland Gardens Planning Response

Hi [REDACTED]

I've attached the flood risk assessment for Morland Gardens for information.

Kind regards

[REDACTED]

On Tue, 16 Jun 2020 at 15:42, [REDACTED] <[REDACTED]@tibbalds.co.uk> wrote:

Thanks for confirming [REDACTED]

Kind regards

[REDACTED]

On Tue, 16 Jun 2020 at 15:35, [REDACTED] <[REDACTED]@london.gov.uk> wrote:

Hi [REDACTED]

Sorry for not responding to your link last week. Yes I have downloaded everything and will respond as soon as I can, likely early next week.

Many thanks,

[REDACTED]

[REDACTED] [REDACTED]

Senior Strategic Planner, Development Management, Planning

GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA

[REDACTED]

020 7983 [REDACTED]

Please contact my mobile in the first instance.

[REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk)

www.london.gov.uk/what-we-do/planning

From: [REDACTED] <[REDACTED]@tibbalds.co.uk>

Sent: 16 June 2020 15:33

To: [REDACTED] <[REDACTED]@london.gov.uk>

Cc: [REDACTED] <[REDACTED]@brent.gov.uk>

Subject: Morland Gardens Planning Response

Hi [REDACTED]

I sent you a wetransfer link last week that's about to expire, I just wanted to check that you have everything downloaded?

Kind regards

[REDACTED]

Senior Planner

for Tibbalds Planning and Urban Design Ltd

tel: 020 7089 [REDACTED]
direct dial: 020 3598 [REDACTED]
e-mail: [REDACTED] [tibbonalds.co.uk](mailto:[REDACTED]@tibbonalds.co.uk)
website: www.tibbonalds.co.uk
Address: 19 Maltings Place, 169 Tower Bridge Road, London, SE1 3JB

Appointed to the HCA Multidisciplinary Panel 2014-2018: www.tibbonaldscampbellreithjv.com

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[REDACTED]
Senior Planner

for Tibbalds Planning and Urban Design Ltd

tel: 020 7089 [REDACTED]
direct dial: 020 3598 [REDACTED]
e-mail: [REDACTED] [tibbonalds.co.uk](mailto:[REDACTED]@tibbonalds.co.uk)
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██████████
Senior Planner

for Tibbalds Planning and Urban Design Ltd

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direct dial: 020 3598 ██████████

e-mail: ██████████ [tibbalds.co.uk](mailto:██████████@tibbalds.co.uk)

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Energy Memo: GLA Consultation

Case details

Date of first review:		02/03/2020
Case Name:	1 Morland Gardens	
Case Number:		5444
Case Officer:	■■■■	
London Borough:	Brent	
Application Type (Outline/Hybrid/Detailed):	Detailed	
Applicant:	London Borough of Brent	
Energy Consultant:	Max Fordham	
Document Title:	Energy, Sustainability and BREEAM Assessment	
Document Date:		23/08/2019

Development proposals

Use	Floorspace/Number of units
Residential	65 units
affordable workspace (use class B1	750 m ²
further education college (Class D1)	2650 m ²

GREATERLONDONAUTHORITY

Comment No.	GLA Stage I Date: 02/03/20	Applicant's Stage I response Date:	GLA Post Stage I response Date:	Applicant's Post Stage I response Date:
General compliance comments				
1	The Energy Hierarchy has broadly been followed; however, the applicant is required to review their energy proposals to ensure compliance with the London Plan policies.	No response provided		
3	The applicant is encouraged to submit the GLA's Carbon Emission Reporting spreadsheet, which has been developed to allow the use of the updated SAP 10 emission factors alongside the SAP 2012 emission factors. The link to the spreadsheet can be found here: https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0 .	No response provided		
4	The applicant has provided the proposed CO2 emissions savings but they should also provide the absolute emissions figures for each element of the energy hierarchy.	No response provided		
Be Lean				
Overheating				
7	The applicant should submit the overheating checklist that helps in identifying potential site-specific risks which may lead to overheating.	No response provided		
8	The applicant should undertake a Dynamic Overheating Analysis to assess the overheating risk. This should follow the CIBSE TM59 methodology for the London Design Summer Year 1 (DSY1) weather file: 2020s, High emission, 50% percentile scenario. The applicant should also investigate the risk of overheating using the DSY 2 & 3 weather files.	No response provided		

	<p>The area weighted average (MJ/m2) and total (MJ/year) cooling demand for the actual and notional building should be provided and the applicant should demonstrate that the actual building's cooling demand is lower than the notional.</p>	
9	<p>A Dynamic Overheating Analysis to assess the overheating risk on any naturally ventilated spaces should be carried out. This should follow the CIBSE TM52 methodology for the London Design Summer Year 1 (DSY1) weather file: 2020s, High emission, 50% percentile scenario. The applicant should also investigate the risk of overheating using the DSY 2 & 3 weather files.</p>	No response provided
Be Clean		
10	<p>The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. They should contact the borough energy officer and ask them whether they know of any opportunities for connection coming forward. Evidence of the correspondence should be provided.</p>	No response provided
11	<p>The applicant should provide a commitment to ensure that the development is designed to allow future connection to a district heating network. It appears that an ambient loop network is proposed; this is not considered readily connectable to district heating in future and an conventional higher temperature heat network would be preferred. Drawings demonstrating how the site is to be future-proofed for a connection to a district heating network should be provided; these should include space provision for heat exchangers in the plant room, isolation valves, safe-guarded pipe route to the site boundary etc.</p>	No response provided
12	<p>The applicant is proposing a site-wide heat network supplied by a centralised energy centre. It should be confirmed that all apartments and non-domestic building uses will be connected to the heat network. A drawing showing the route of the heat network linking all buildings/uses on the site has been/should be provided alongside a drawing indicating the floor area, internal layout and location of the energy centre.</p>	No response provided

13 The applicant is not proposing to install any Photovoltaic (PV) panels and suggests that roofspace is used for amenity space and ASHPs. This is very disappointing. They should review the proposals and provide a rationalised roof design including for all required uses including for PV. They should confirm the proposed kWp, net PV area and kWh of electricity generation. A detailed roof layout should be provided demonstrating that the roof's potential for a PV installation has been maximised. The on-site savings from renewable energy technologies should be maximised regardless of the London Plan targets having been met.

Centralised heat pumps are being proposed in the form of an ambient loop network. An ambient loop network is not considered readily connectable to district heating in future and a conventional higher temperature heat network served by ASHPs would be preferred. Further information on the proposed heat pumps should be provided including:

a. An estimate of the heating and/or cooling energy (MWh/annum) the heat pumps would provide to the development and the percentage of contribution to the site's heat loads.

b. Details of how the Seasonal Coefficient of Performance (SCOP) and Seasonal Energy Efficiency ratio (SEER) has been calculated for the energy modelling. This should be based on a dynamic calculation of the system boundaries over the course of a year i.e. incorporating variations in source temperatures and the design sink temperatures (for space heat and hot water).

c. Manufacturer datasheets showing performance

No response provided

14	<p>under test conditions for the specific source and sink temperatures of the proposed development and assumptions for hours spent under changing source temperatures. Whether any additional technology is required for hot water top up and how this has been incorporated into the energy modelling assumptions.</p> <p>d. An estimate of the expected heating costs to occupants, demonstrating that the costs have been minimised through energy efficient design.</p> <p>e. The expected heat source temperature and the heat distribution system temperature with an explanation of how the difference will be minimised to ensure the system runs efficiently. The distribution loss factor should be calculated based on the above information and used for calculation purposes.</p> <p>f. A commitment to monitor the performance of the heat pump system post-construction to ensure it is achieving the expected performance approved during planning. (It is recommended that boroughs condition this).</p>	No response provided
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Carbon performance and offsetting

15	<p>The applicant should provide the relevant modellings output sheets (i.e. TER, DER, BRUKL) for the Be Lean stage of the energy hierarchy.</p>
16	<p>The carbon dioxide savings exceed the on-site target set within Policy 5.2 of the London Plan for domestic uses, however, they fall short for non-domestic uses.</p> <p>The applicant should consider the scope for additional measures aimed at achieving further carbon reductions for the non-domestic element.</p>
17	<p>The applicant should ensure that the remaining regulated CO2 emissions will be met through a contribution to the borough’s offset fund and should confirm the tonnes CO2 of shortfall and the associated £. Evidence of correspondence with the borough confirming this should be provided.</p>

Other points

Move resolved comments under this section

2	For the purposes of this assessment, the applicant will be estimating the CO2 emission performance against London Plan policies using the SAP 10 emissions factors. This is supported.	No response provided
5	Based on the information provided, the domestic element of the proposed development is estimated to achieve a reduction of 10% in regulated CO2 emissions compared to a 2013 Building Regulations compliant development.	No response provided
6	Based on the information provided, the non-domestic element of the proposed development is estimated to achieve a reduction of 17% in regulated CO2 emissions compared to a 2013 Building Regulations compliant development.	No response provided

Domestic

SAP 10	Total residual regulated CO ₂ emissions	Regulated CO ₂ emissions reductions	
	(tonnes per annum)	(tonnes per annum)	(per cent)
Baseline i.e. 2013 Building Regulations	TBC		
Energy Efficiency	TBC	1	10%
CHP	TBC	0	0%
Renewable energy	TBC	6	61%
Total		7	71%

Non-domestic

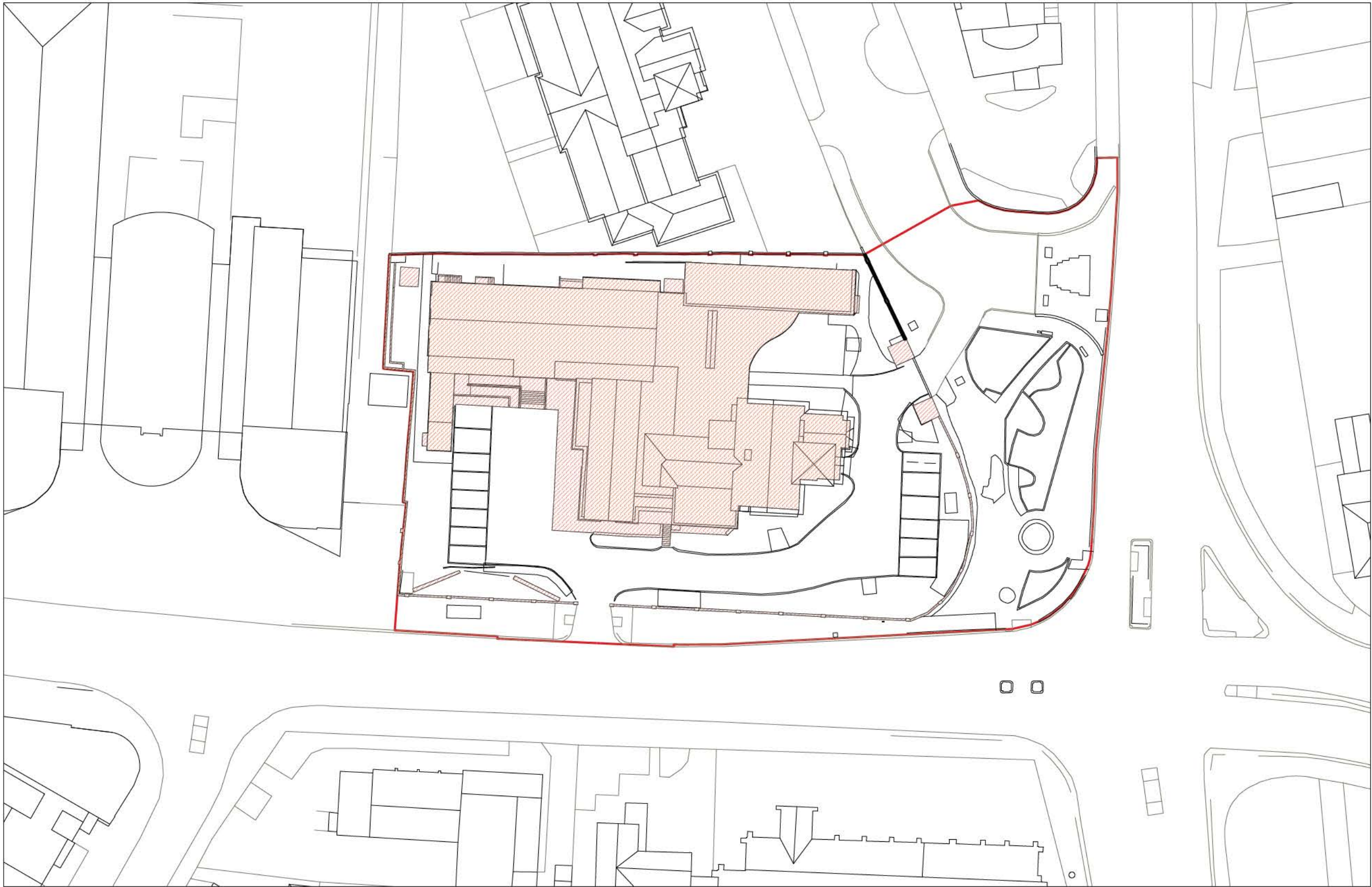
SAP 10	Total residual regulated CO ₂ emissions	Regulated CO ₂ emissions reductions	
	(tonnes per annum)	(tonnes per annum)	(per cent)
Baseline i.e. 2013 Building Regulations	TBC		
Energy Efficiency	TBC	7	17%
CHP	TBC	0	0%
Renewable energy	TBC	6	14%
Total		13	33%

Carbon offsetting

	Shortfall (tonnes per annum)	Shortfall (£)
Domestic	TBC	TBC
Non-domestic	TBC	TBC
Total	TBC	TBC

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mail@clth.co.uk

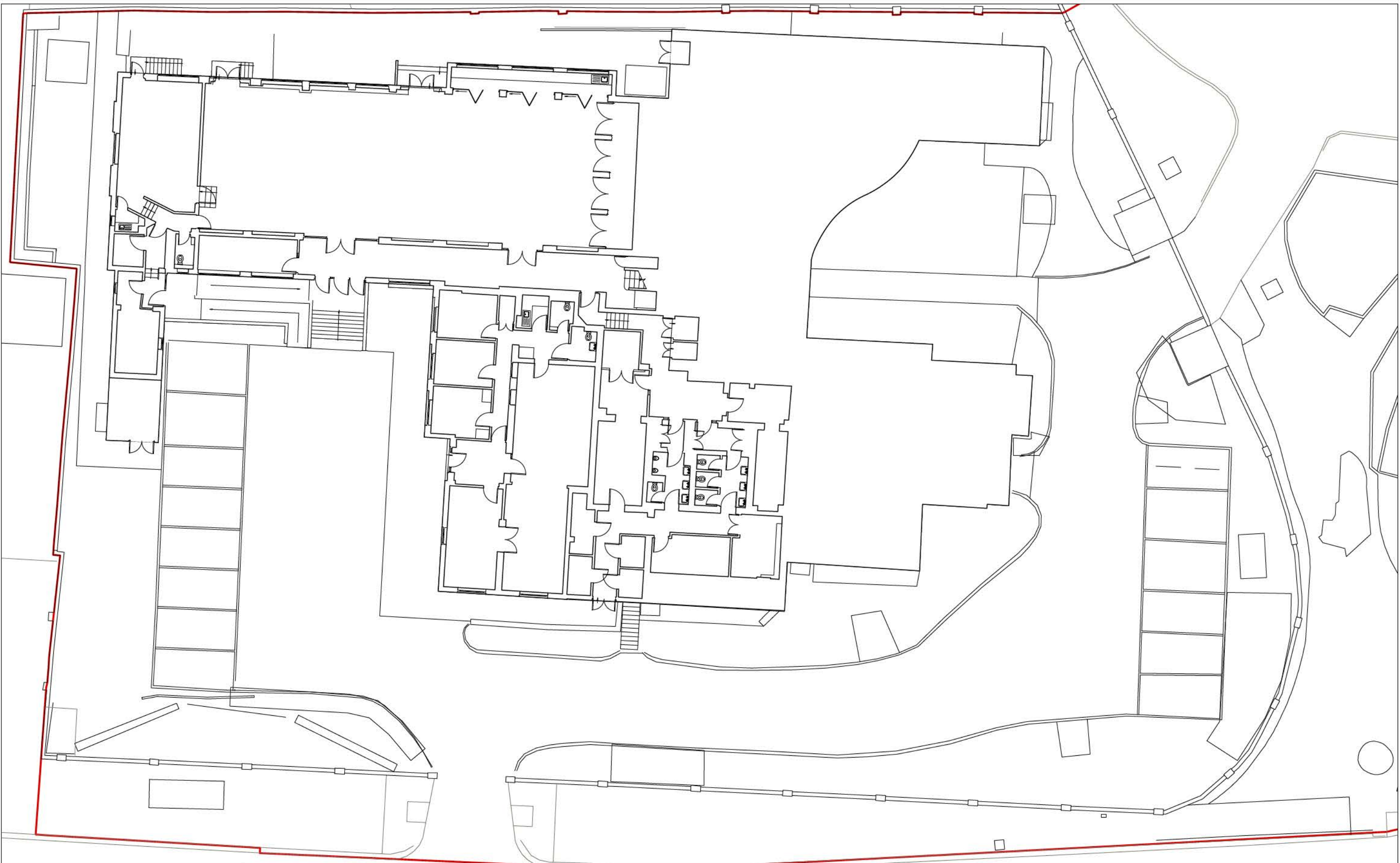
issued 10/01/2020



Demolition Plan
1:500



<div>Key</div> <div><div></div>Demolition</div>	<div>Rev</div> <div>Date</div> <div>Drawn</div> <div>Comment</div>	<div>Date of First Issue</div> <div>10.01.2020</div> <div>Issued</div> <div>WH</div> <div>Drawn</div> <div>AT</div> <div>Checked</div> <div>WH</div> <div>Scale</div> <div>1:250 @ A1</div> <div>1:500 @ A3</div>	<div>Planning</div> <div>Drawing Title</div> <div>Existing Demolition Plan</div> <div>Drawing No.</div> <div>01008 1002</div> <div>Rev</div> <div>-</div>	<div>Curl la Tourelle Head Architecture</div> <div>80 Lamble Street, London NW5 4AB</div> <div>+44 (0)20 7267 0055</div> <div>www.clth.co.uk</div> <div>© Curl la Tourelle Head Architecture</div>
	<div>Client</div> <div>London Borough of Brent</div> <div>Job</div> <div>Morland Gardens</div> <div>Brent NW10 8DY</div>			

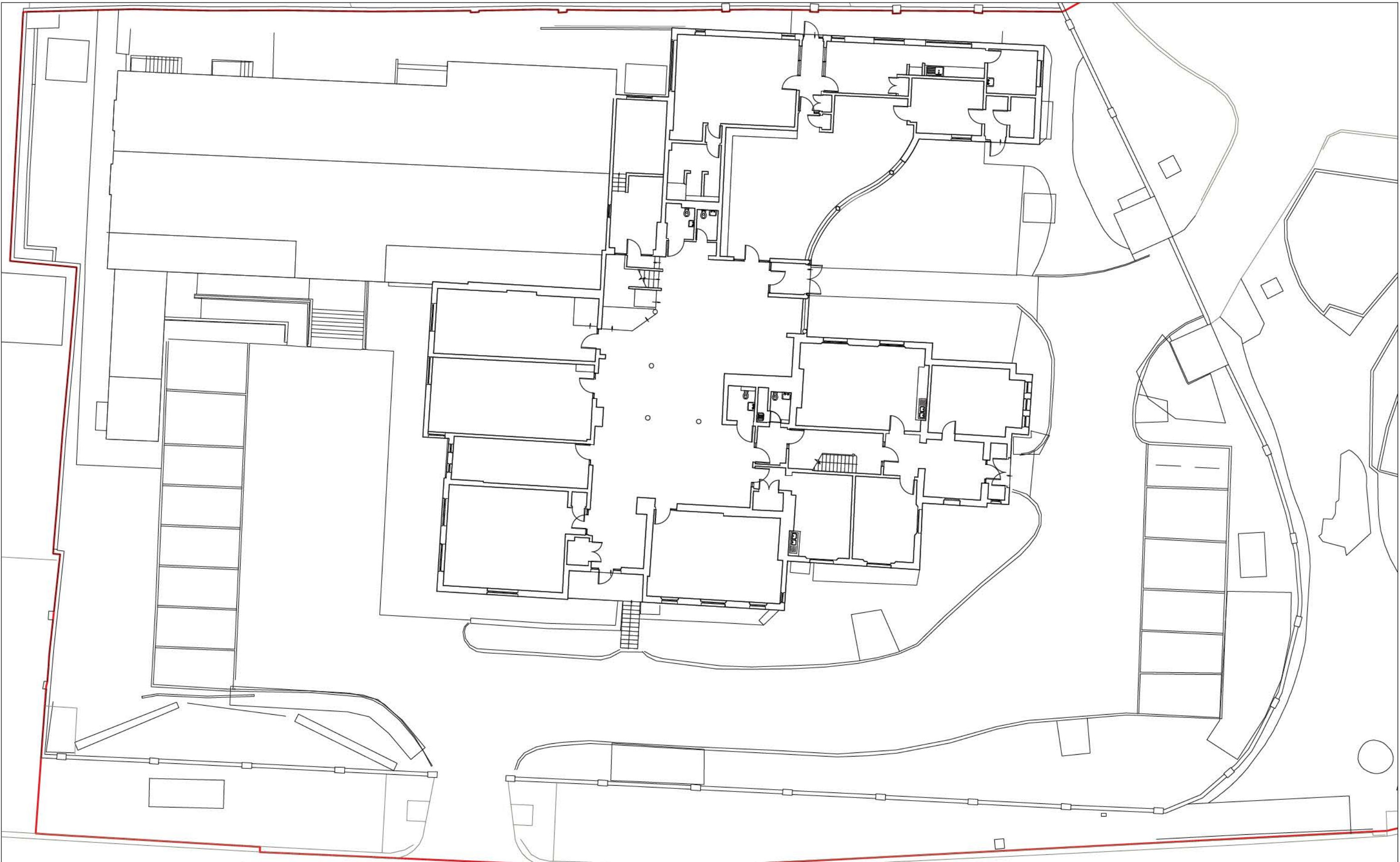


Existing
Lower Ground Floor Plan
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Rev	Date	Drawn	Comment

Client London Borough of Brent Job Morland Gardens Brent NW10 8DY	Date of First Issue 10.01.2020	Issued WH	Planning Drawing Title Existing Lower Ground Floor Plan Drawing No. 01008 1100	Rev -	Curl la Tourelle Head Architecture 80 Lamble Street, London NW5 4AB +44 (0)20 7267 0055 www.clth.co.uk © Curl la Tourelle Head Architecture
	Drawn AT	Checked WH			
	Scale 1:100 @ A1 1:200 @ A3				



Existing
Ground Floor Plan
1:200



Rev	Date	Drawn	Comment
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Client
London Borough of Brent

Job
Morland Gardens
Brent NW10 8DY

Date of
First Issue
10.01.2020

Drawn
AT

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1:200 @ A3

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WH

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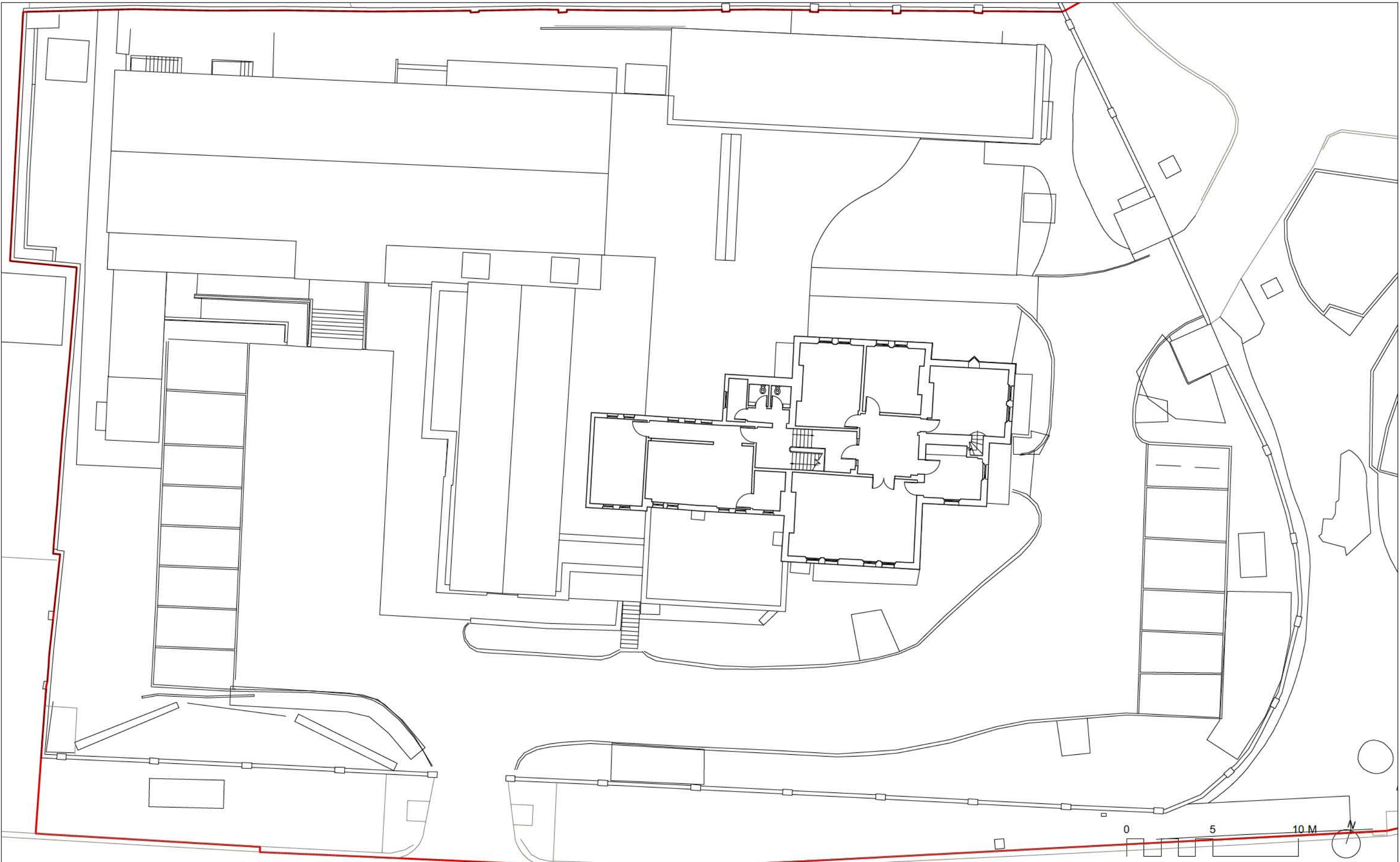
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Drawing Title
Existing
Ground Floor Plan

Drawing No.
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First Floor Plan
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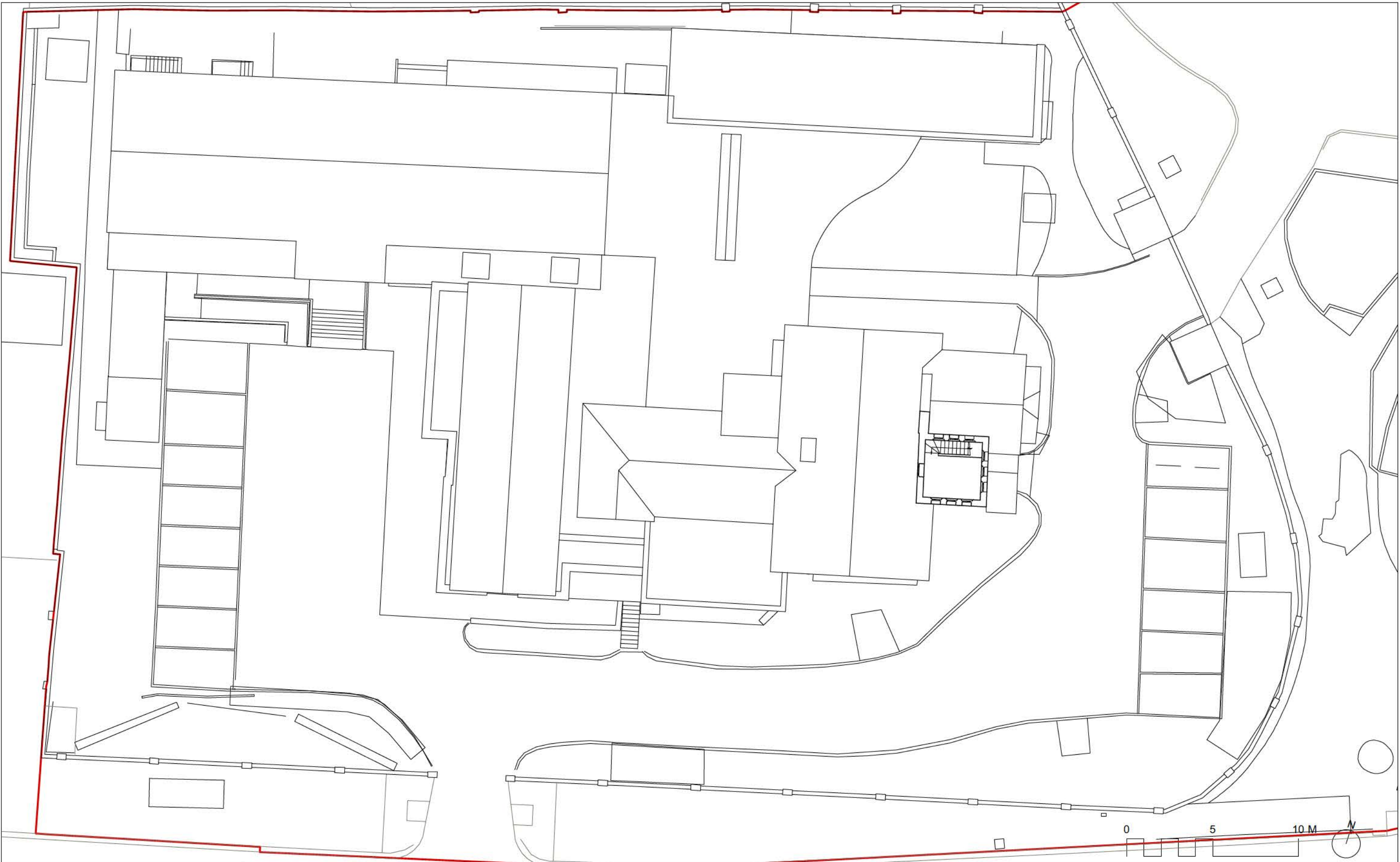
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First Floor Plan

Drawing No.
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Existing
Second Floor Plan
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10.01.2020

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WH

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Planning

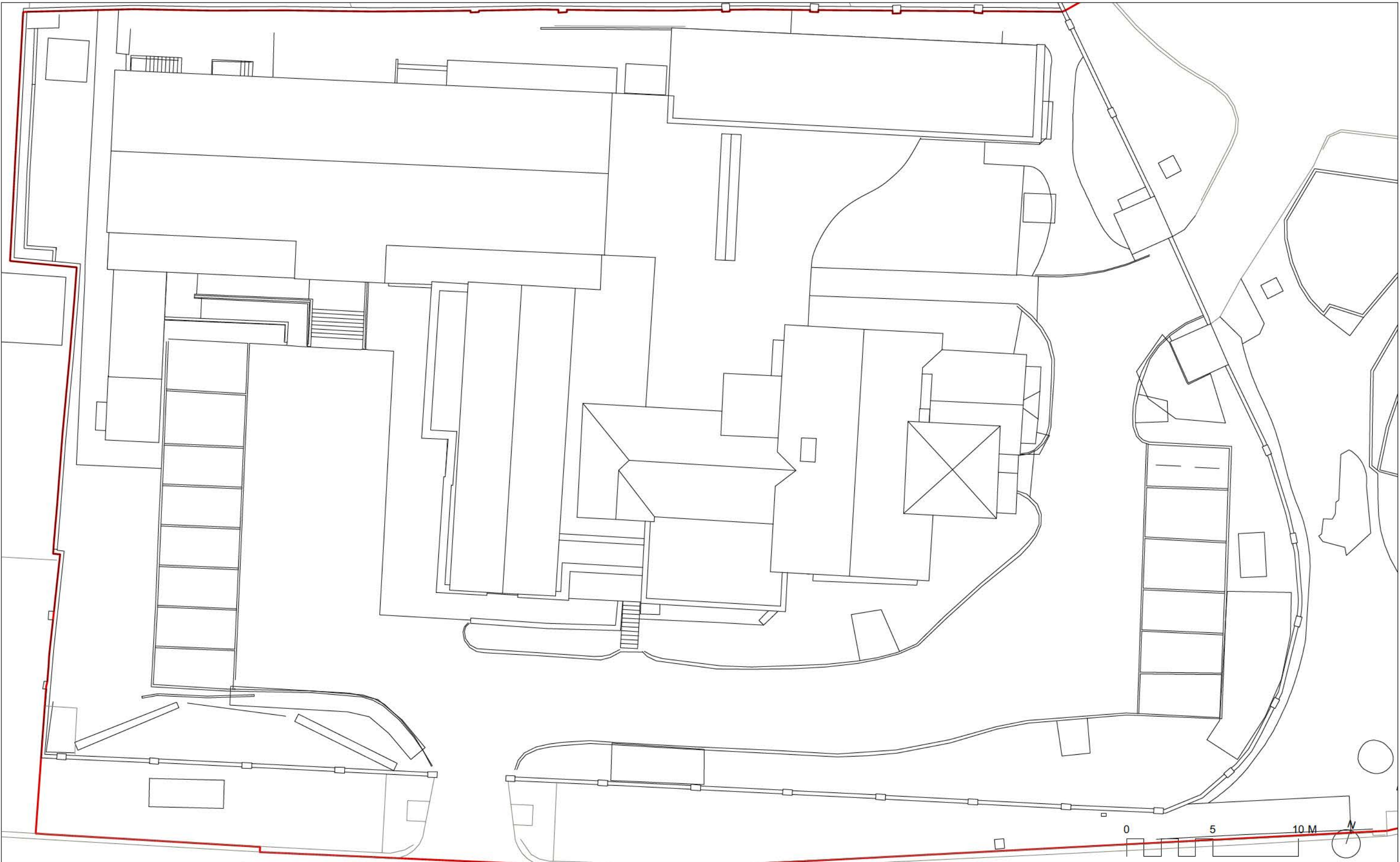
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Second Floor Plan

Drawing No.
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Roof Plan
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WH

Planning

Drawing Title
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Roof Plan

Drawing No.
01008 1104

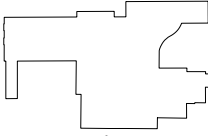
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


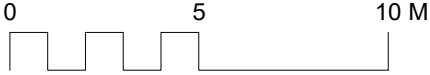
Existing
South Elevation
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South

Diagrammatic Plan 1:2000





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Client
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10.01.2020

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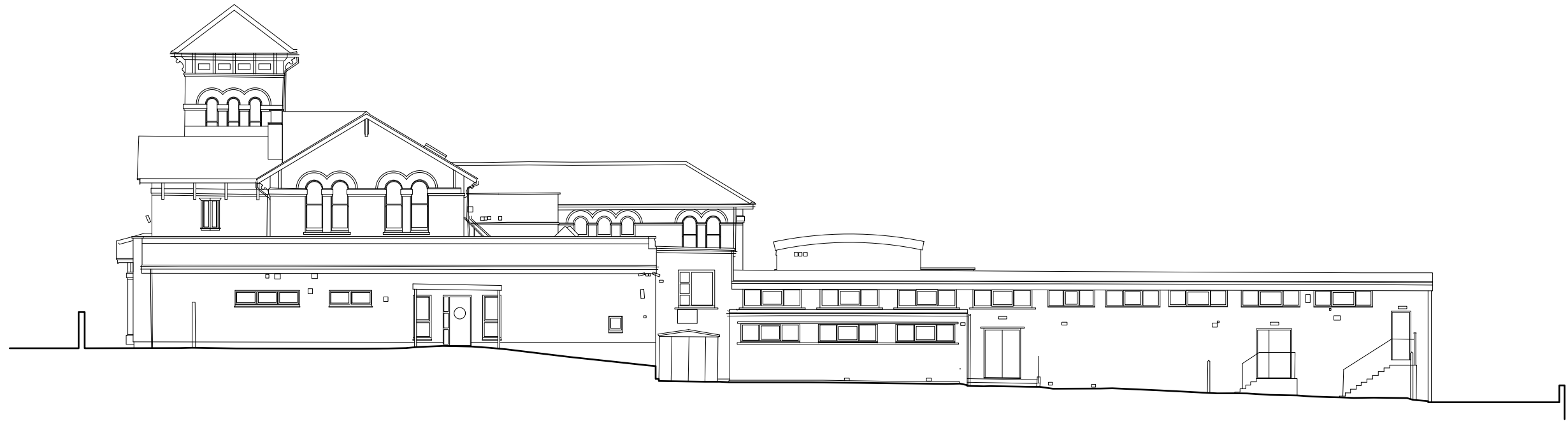
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Existing South Elevation

Drawing No.
01008 1105

Rev
-

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Existing
North Elevation
1:200

North

Diagrammatic Plan 1:2000

N

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Client
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Job
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10.01.2020

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North Elevation

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Rev
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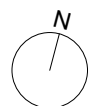
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West Elevation
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Existing
East Elevation
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Diagrammatic Plan 1:2000



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East & West Elevations

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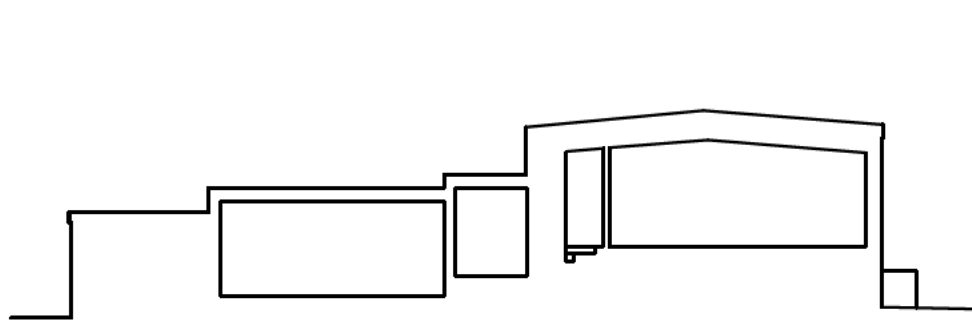
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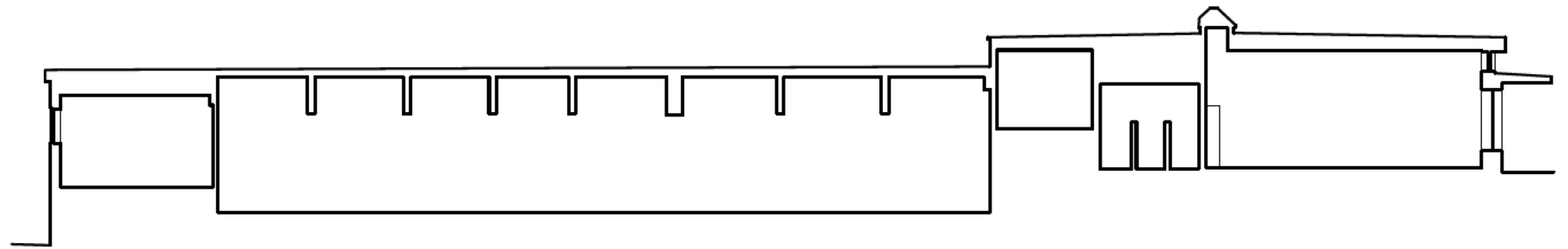
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Job
Morland Gardens
Brent NW10 8DY

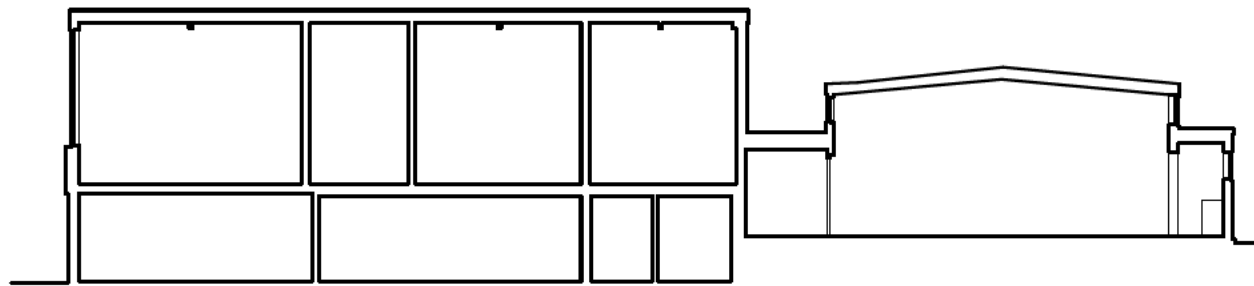
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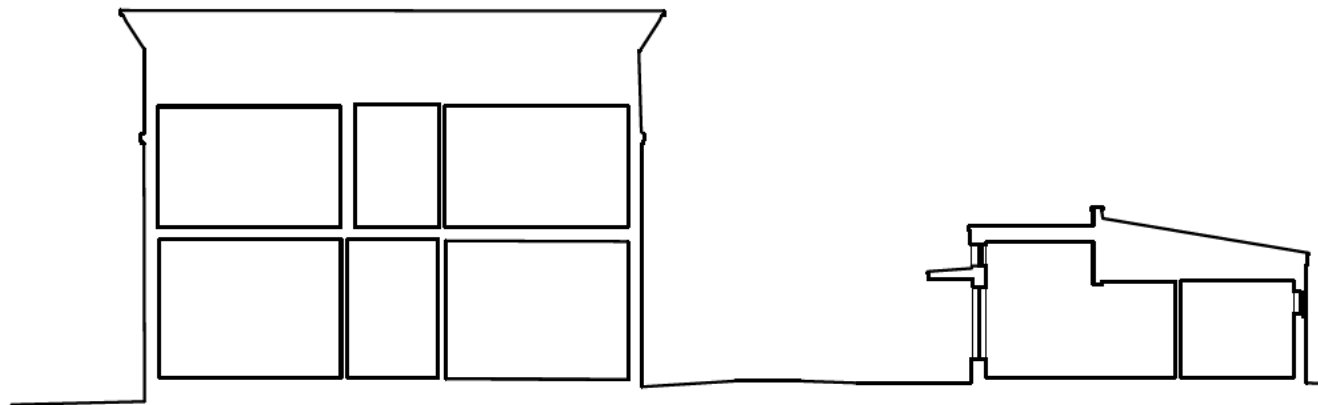
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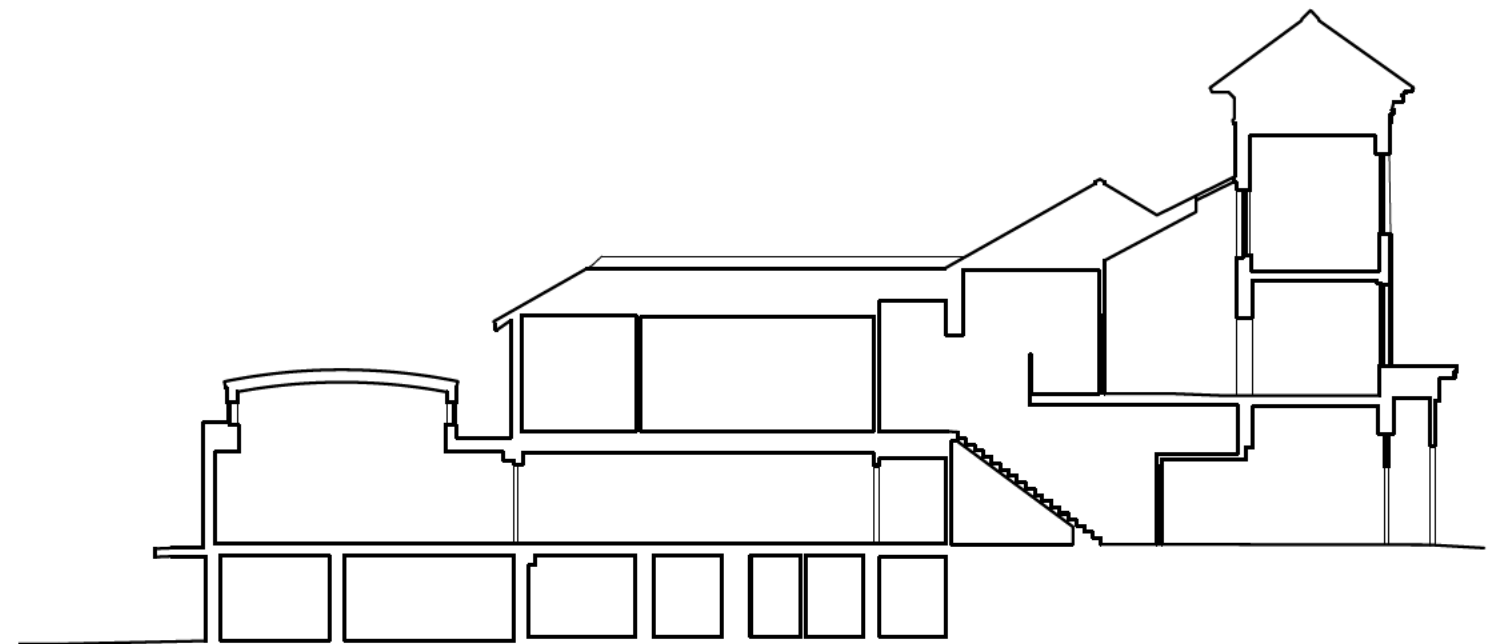
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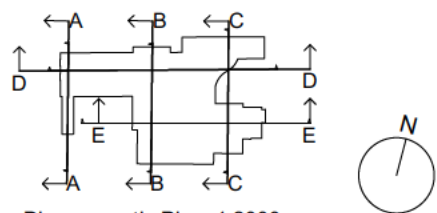
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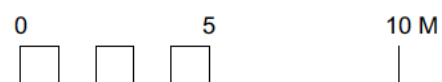
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Diagrammatic Plan 1:2000



Rev	Date	Drawn	Comment
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Date of
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Client
London Borough of Brent

Drawn
AT

Checked
WH

Drawing No.
01008 1108

Rev
-

Job
Morland Gardens
Brent NW10 8DY

Scale
1:100 @ A1
1:200 @ A3

Curl la Tourelle Head Architecture

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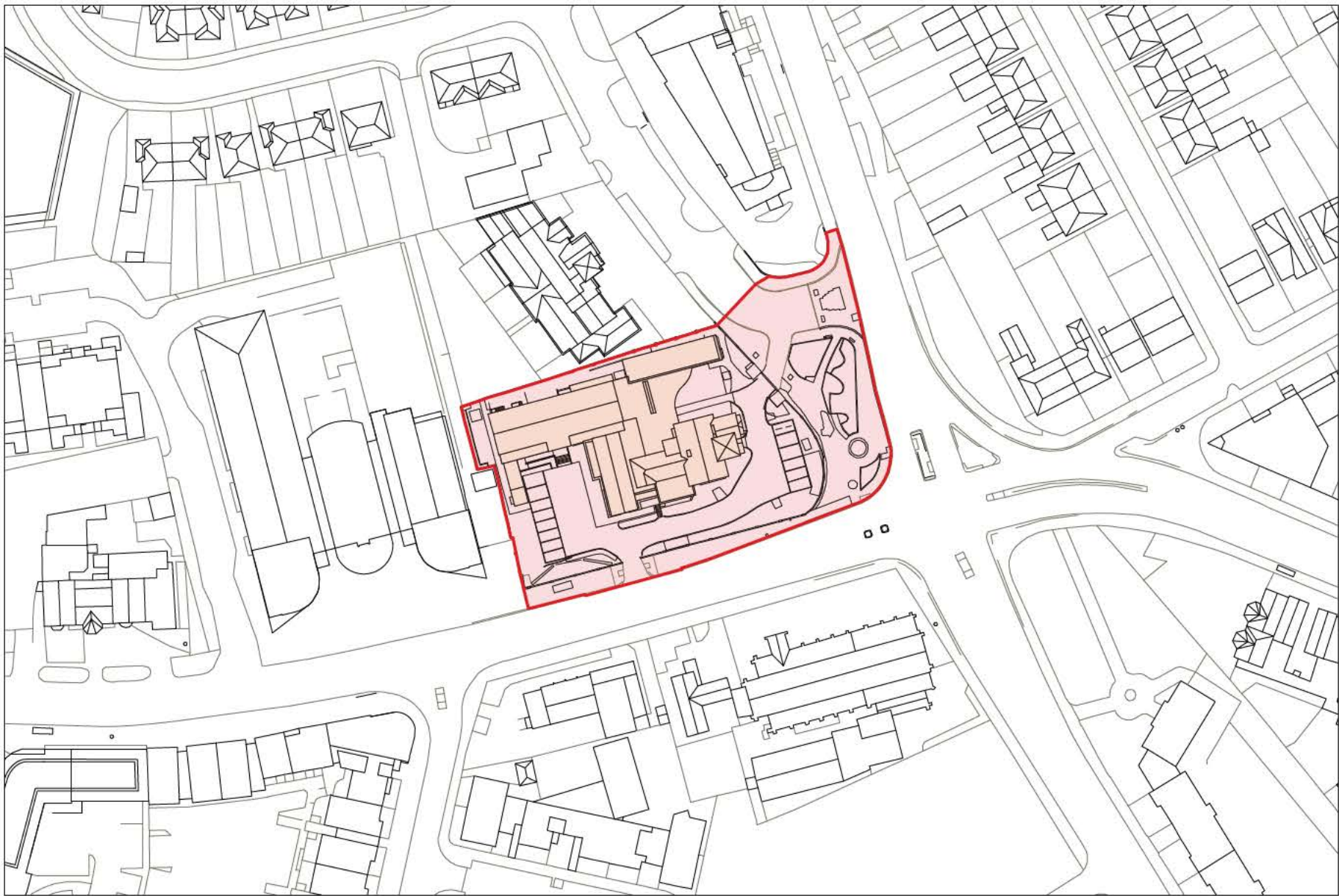
mail@clth.co.uk

DRAWING ISSUE SHEET 1008 - No 1000 to 2405													Status	10.01.20 - Planning Sub. 1	11.03.20 - Planning Sub. 2	04.06.20 - Planning Sub. 3
Project	Originator	Zone	Level	Type	Role	Drawing no.	Description	Full Description	Scale	Paper Size						
01008	CLTH	01	RF	DR	A	1000	Existing Location Plan	Existing Location Plan	1250	A3	-	X				
01008	CLTH	01	RF	DR	A	1001	Existing Site Plan	Existing Site Plan	500	A3	-	X				
01008	CLTH	01	RF	DR	A	1002	Demolition Plan	Demolition Plan	500	A3	-	X				
											-					
01008	CLTH	01	RF	DR	A	1100	Existing Lower Ground Floor Plan	Existing Lower Ground Floor Plan	100	A1	-	X				
01008	CLTH	01	RF	DR	A	1101	Existing Upper Ground Floor Plan	Existing Upper Ground Floor Plan	100	A1	-	X				
01008	CLTH	01	RF	DR	A	1102	Existing First Floor Plan	Existing First Floor Plan	100	A1	-	X				
01008	CLTH	01	RF	DR	A	1103	Existing Second Floor Plan	Existing Second Floor Plan	100	A1	-	X				
01008	CLTH	01	RF	DR	A	1104	Existing Roof Plan	Existing Roof Plan	100	A1	-	X				
01008	CLTH	01	RF	DR	A	1105	Existing South Elevation	Existing South Elevation	100	A1	-	X				
01008	CLTH	01	RF	DR	A	1106	Existing North Elevation	Existing North Elevation	100	A1	-	X				
01008	CLTH	01	RF	DR	A	1107	Existing East West Elevation	Existing East West Elevation	100	A1	-	X				
01008	CLTH	01	RF	DR	A	1108	Existing Sections	Existing Sections	100	A1	-	X				
01008	CLTH	01	RF	DR	A	2000	Proposed Site Location Plan	Proposed Site Location Plan	1250	A3	A	X			X	
01008	CLTH	01	00	DR	A	2001	Proposed Site Plan	Proposed Site Plan	500	A3	A	X			X	
01008	CLTH	01	B1	DR	A	2100	Lower Ground Floor Plan	Lower Ground Floor Plan 1 to 500	500	A3	A	X			X	
01008	CLTH	01	00	DR	A	2101	Upper Ground Floor Plan	Upper Ground Floor Plan 1 to 500	500	A3	A	X			X	
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01008	CLTH	XX	00	DR	A	2251	Proposed UpperGroundFloorPlan	Upper Ground Floor Plan	100	A1	A	X			X	
01008	CLTH	XX	01	DR	A	2252	Proposed Level1Plan	Level 1	100	A1	B	X	X		X	
01008	CLTH	XX	02	DR	A	2253	Proposed Level2Plan	Level 2	100	A1	B	X	X		X	
01008	CLTH	XX	03	DR	A	2254	Proposed Level3Plan	Level 3	100	A1	B	X	X		X	
01008	CLTH	XX	04	DR	A	2255	Proposed Level4Plan	Level 4	100	A1	B	X	X		X	
01008	CLTH	XX	05	DR	A	2256	Proposed Level5Plan	Level 5	100	A1	B	X	X		X	
01008	CLTH	XX	06	DR	A	2257	Proposed Level6Plan	Level 6	100	A1	B	X	X		X	
01008	CLTH	XX	07	DR	A	2258	Proposed Level7Plan	Level 7	100	A1	B	X	X		X	
01008	CLTH	XX	08	DR	A	2259	Proposed Level8Plan	Level 8	100	A1	B	X	X		X	
01008	CLTH	XX	09	DR	A	2260	Proposed Level9Plan	Level 9	100	A1	A	X			X	
01008	CLTH	XX	RF	DR	A	2261	Proposed LevelRFPlan	Roof Plan	100	A1	A	X			X	
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01008	CLTH	XX	XX	DR	A	2304	East Elevations	East Elevations	200	A3	-	X				

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Project	Originator	Zone	Level	Type	Role	Drawing no.	Description	Full Description	Scale	Paper Size							
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01008	CLTH	01	XX	DR	A	2405	Long Section CC	Long Section CC		200	A3	-	X				
Issued to									Whom								
								LB Brent	JO					X	X	X	
								CLTH (Principal Designer)	0								
								Allman Woodcock	CW								
								Fire Ingenuity	NW								
								Structure Mode	GM								
								Max Fordham	TB								
								Planit ie	CO								
								Vectos	AP								
								Right To Light	MJ								
								T bbalds	MB					X	X	X	
								MZA Acoustics	KD								
								Compass Archeology	0								
								Price & Myers	SR								
								PFB (Principal Designer)	SB								
								EURBAN	AS								
												Purpose of Issue	PL	PL	PL		
												Method of Issue	E	E	E		
											PDF		X	X		X	
											IFC						
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Notes								Purpose of Issue		P = Preliminary PL = Planning T = Tender C							
								Method of Issue		P = Paper Copy E = E-mail copy							

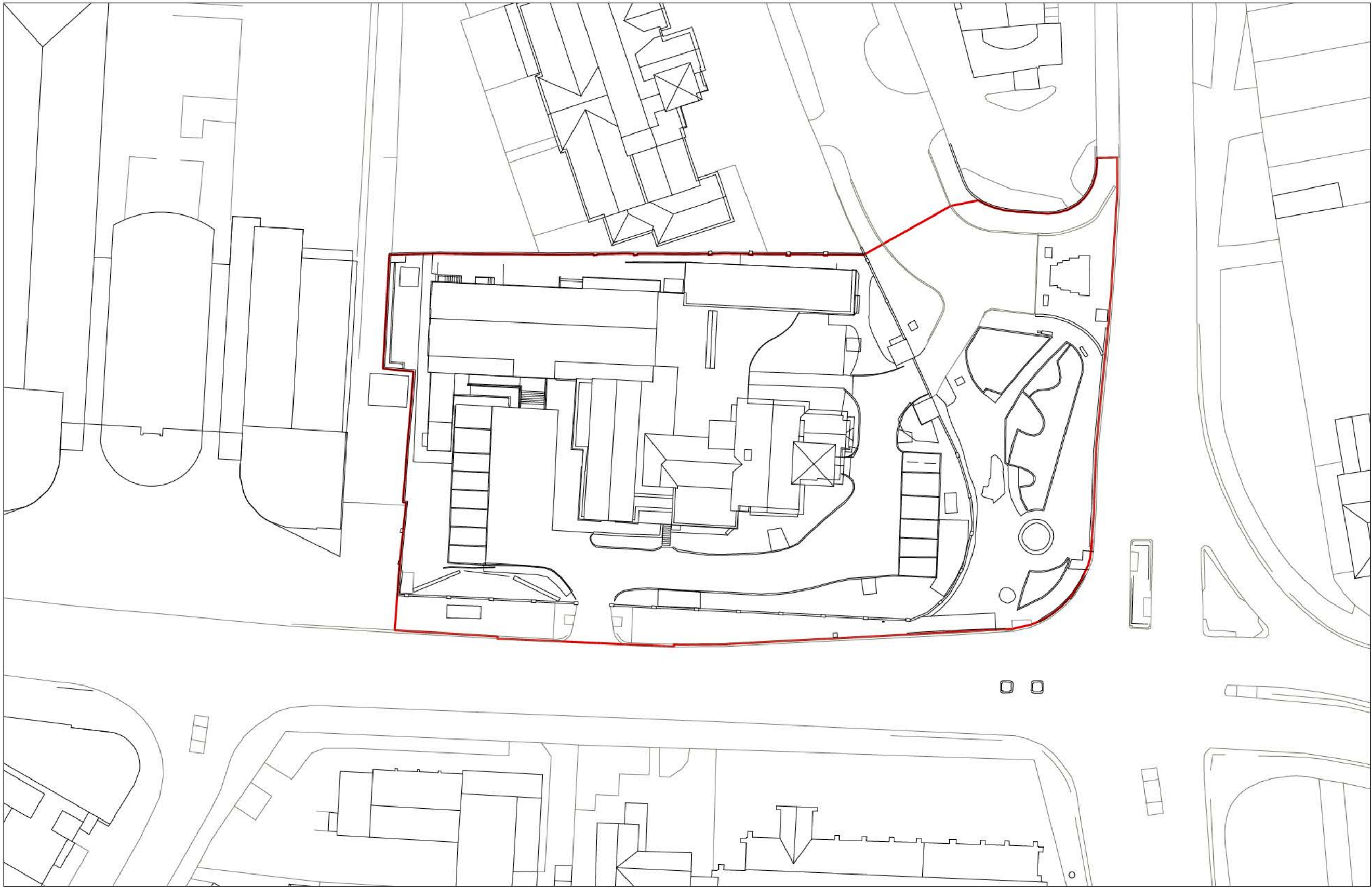


Existing Location Plan
1:1250



Rev Date Drawn Comment		

Client London Borough of Brent	Date of First Issue 10.01.2020	Issued WH	Planning Drawing Title Existing Location Plan	Drawing No. 01008 1000	Rev -	Curl la Tourelle Head Architecture 80 Lambie Street, London NW5 4AB +44 (0)20 7267 0055 www.clth.co.uk © Curl la Tourelle Head Architecture
	Drawn AT	Checked WH				
Job Morland Gardens Brent NW10 8DY	Scale 1:625 @ A1 1:1250 @ A3					

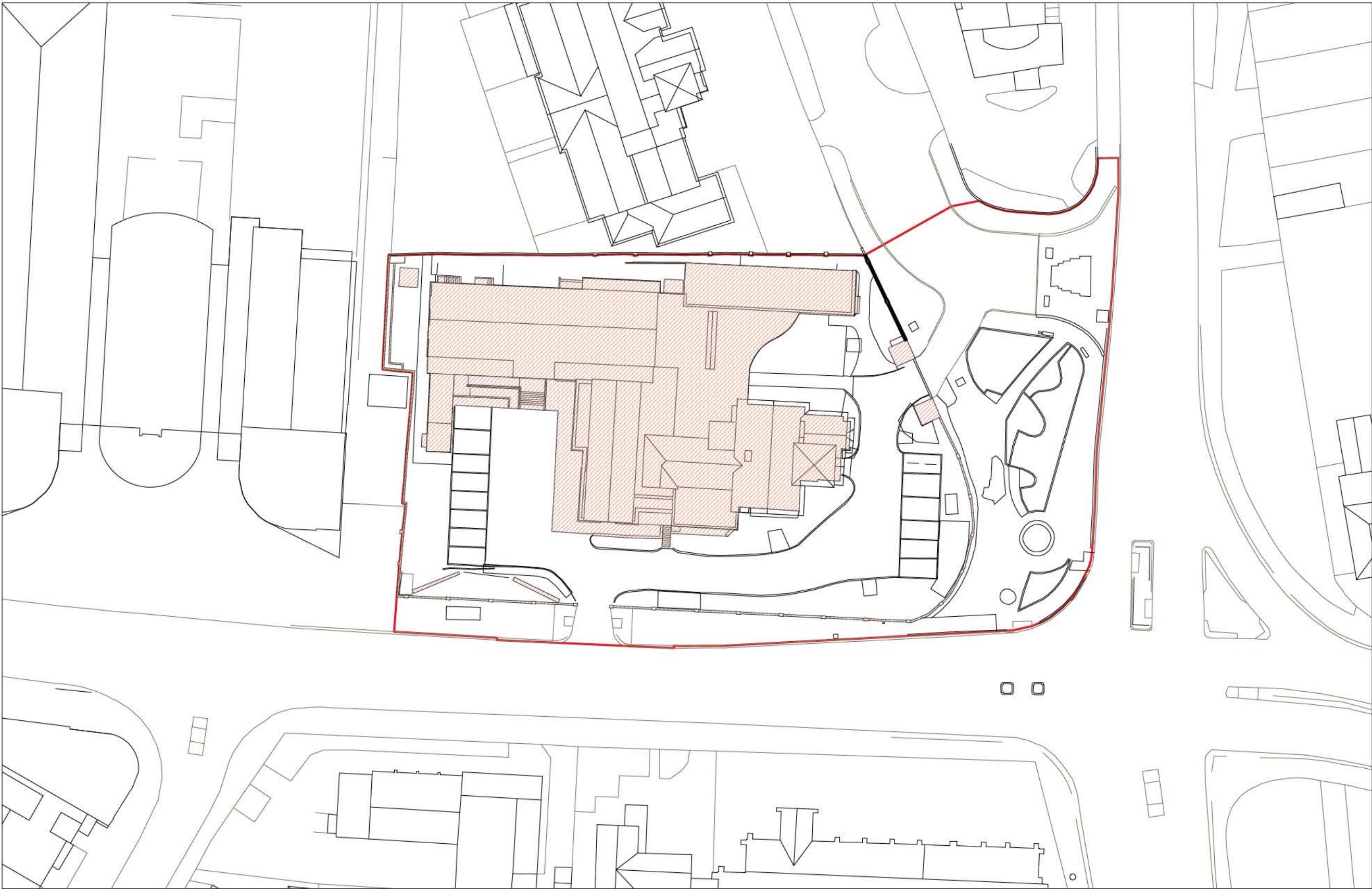


Existing Site Plan
1:500



Rev Date Drawn Comment		

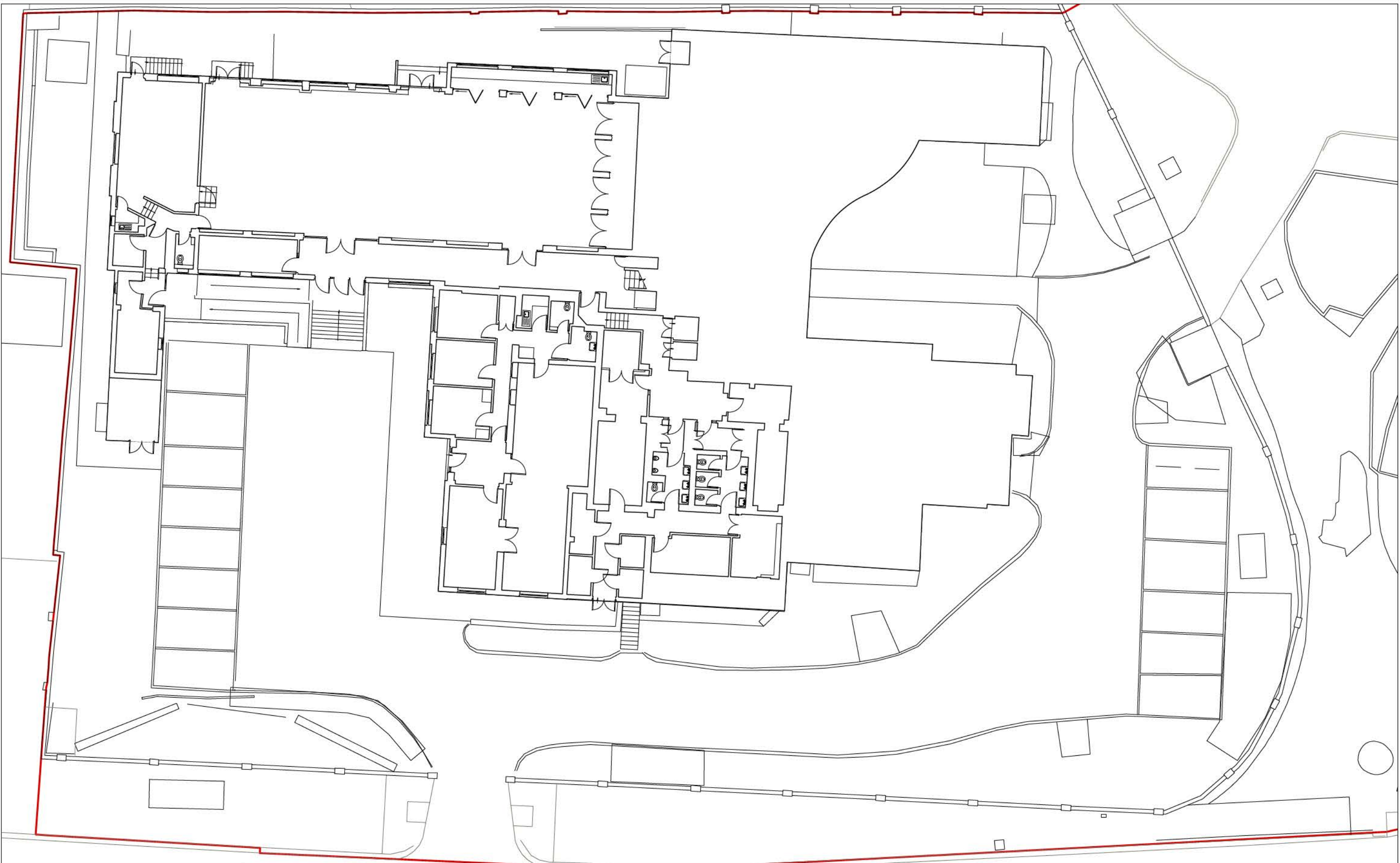
Client London Borough of Brent	Date of First Issue 10.01.2020	Issued WH	Planning Drawing Title Existing Site Plan	Curl la Tourelle Head Architecture
	Drawn AT	Checked WH		
Job Morland Gardens Brent NW10 8DY	Scale 1:250 @ A1 1:500 @ A3		Drawing No. 01008 1001	80 Lamble Street, London NW5 4AB +44 (0)20 7267 0055 www.cth.co.uk © Curl la Tourelle Head Architecture
			Rev -	



Demolition Plan
1:500



<div>Key</div> <div><div></div>Demolition</div>	<div>Rev</div> <div>Date</div> <div>Drawn</div> <div>Comment</div>	<div>Date of First Issue</div> <div>10.01.2020</div> <div>Issued</div> <div>WH</div> <div>Checked</div> <div>WH</div> <div>Planning</div> <div>Drawing Title</div> <div>Existing Demolition Plan</div> <div>Drawing No.</div> <div>01008 1002</div> <div>Rev</div> <div>-</div>	<div>Curl la Tourelle Head Architecture</div> <div>80 Lamble Street, London NW5 4AB</div> <div>+44 (0)20 7267 0055</div> <div>www.clth.co.uk</div> <div>© Curl la Tourelle Head Architecture</div>	
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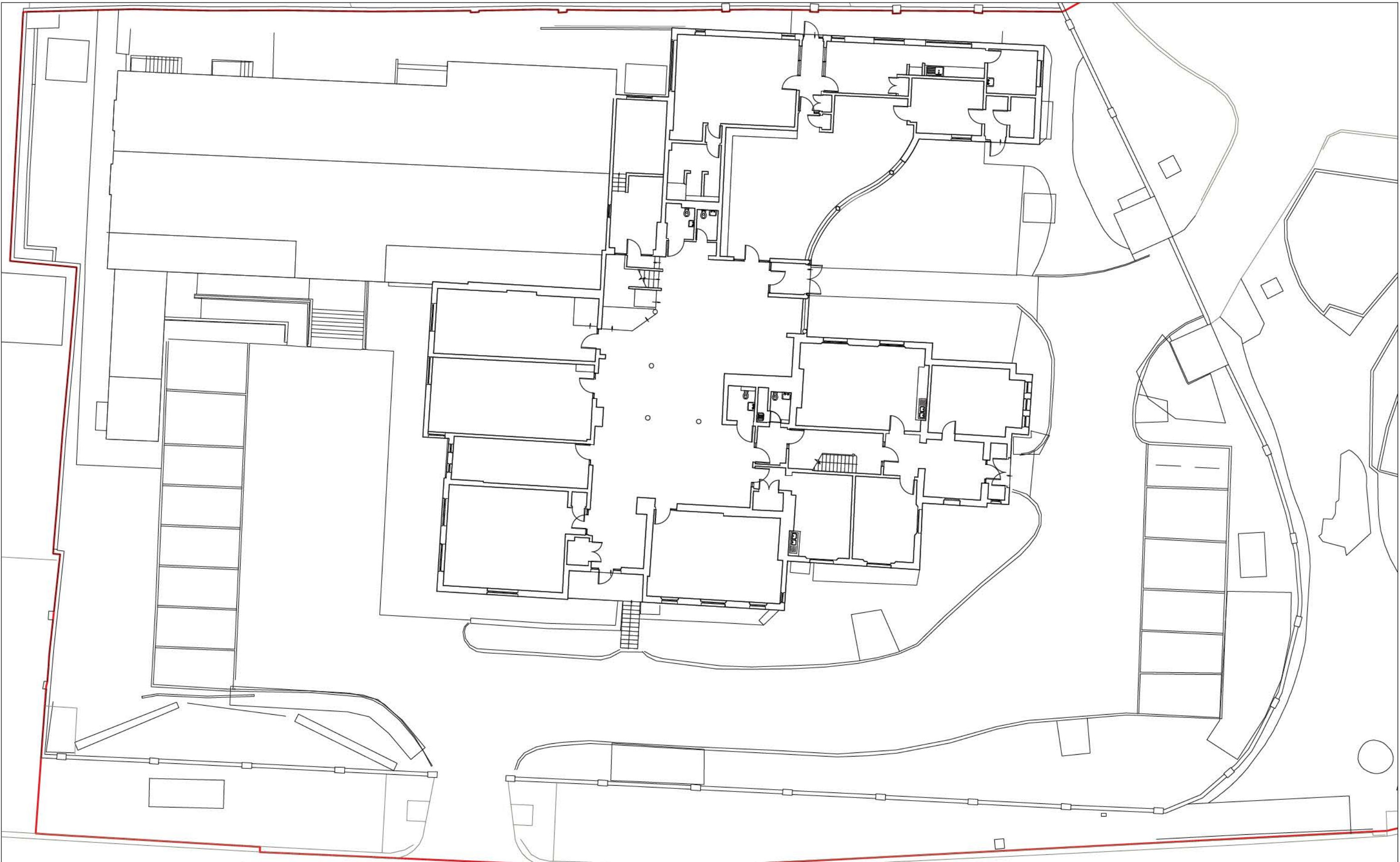


Existing
Lower Ground Floor Plan
1:200



Rev	Date	Drawn	Comment

Client London Borough of Brent	Date of First Issue 10.01.2020	Issued WH	Planning	Curl la Tourelle Head Architecture
	Drawn AT	Checked WH	Drawing Title Existing Lower Ground Floor Plan	
	Scale 1:100 @ A1 1:200 @ A3	Drawing No. 01008 1100	Rev -	
Job Morland Gardens Brent NW10 8DY				



Existing
Ground Floor Plan
1:200



Rev	Date	Drawn	Comment
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Client
London Borough of Brent

Job
Morland Gardens
Brent NW10 8DY

Date of
First Issue
10.01.2020

Drawn
AT

Scale
1:100 @ A1
1:200 @ A3

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WH

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WH

Planning

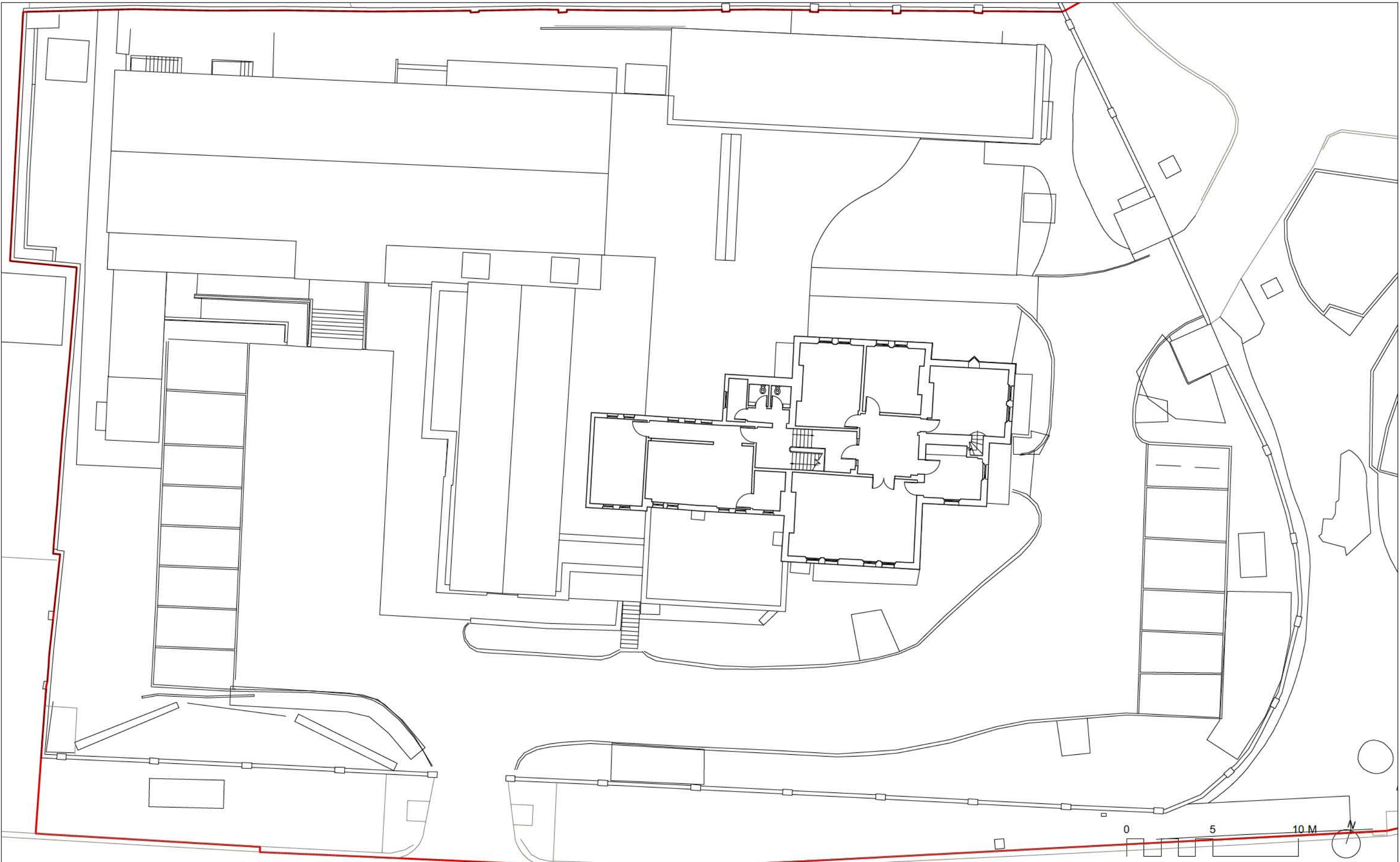
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Existing
Ground Floor Plan

Drawing No.
01008 1101

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Existing
First Floor Plan
1:200



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1:100 @ A1
1:200 @ A3

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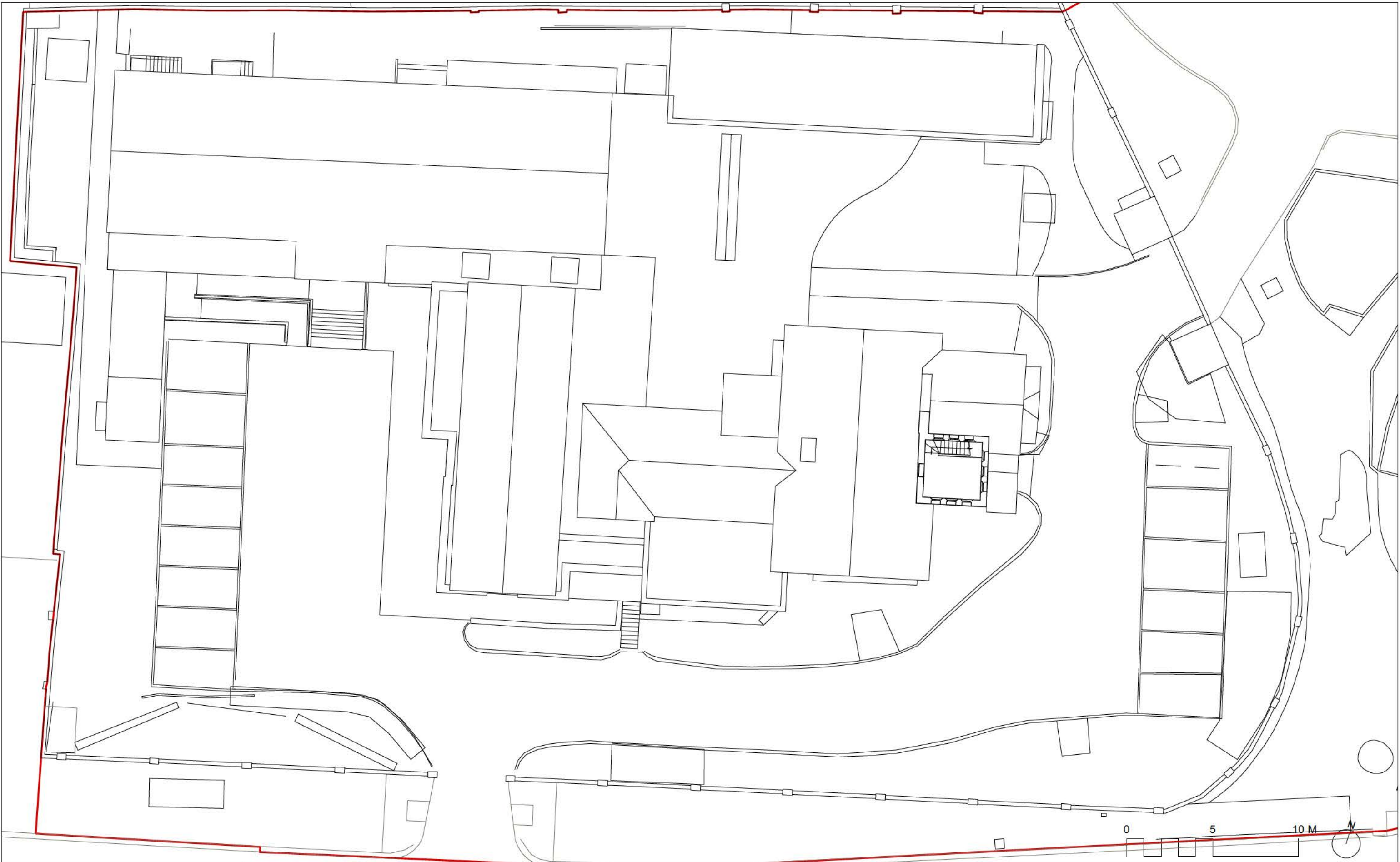
Drawing Title
Existing
First Floor Plan

Drawing No.
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Existing
Second Floor Plan
1:200



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10.01.2020

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AT

Scale
1:100 @ A1
1:200 @ A3

Issued
WH

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WH

Planning

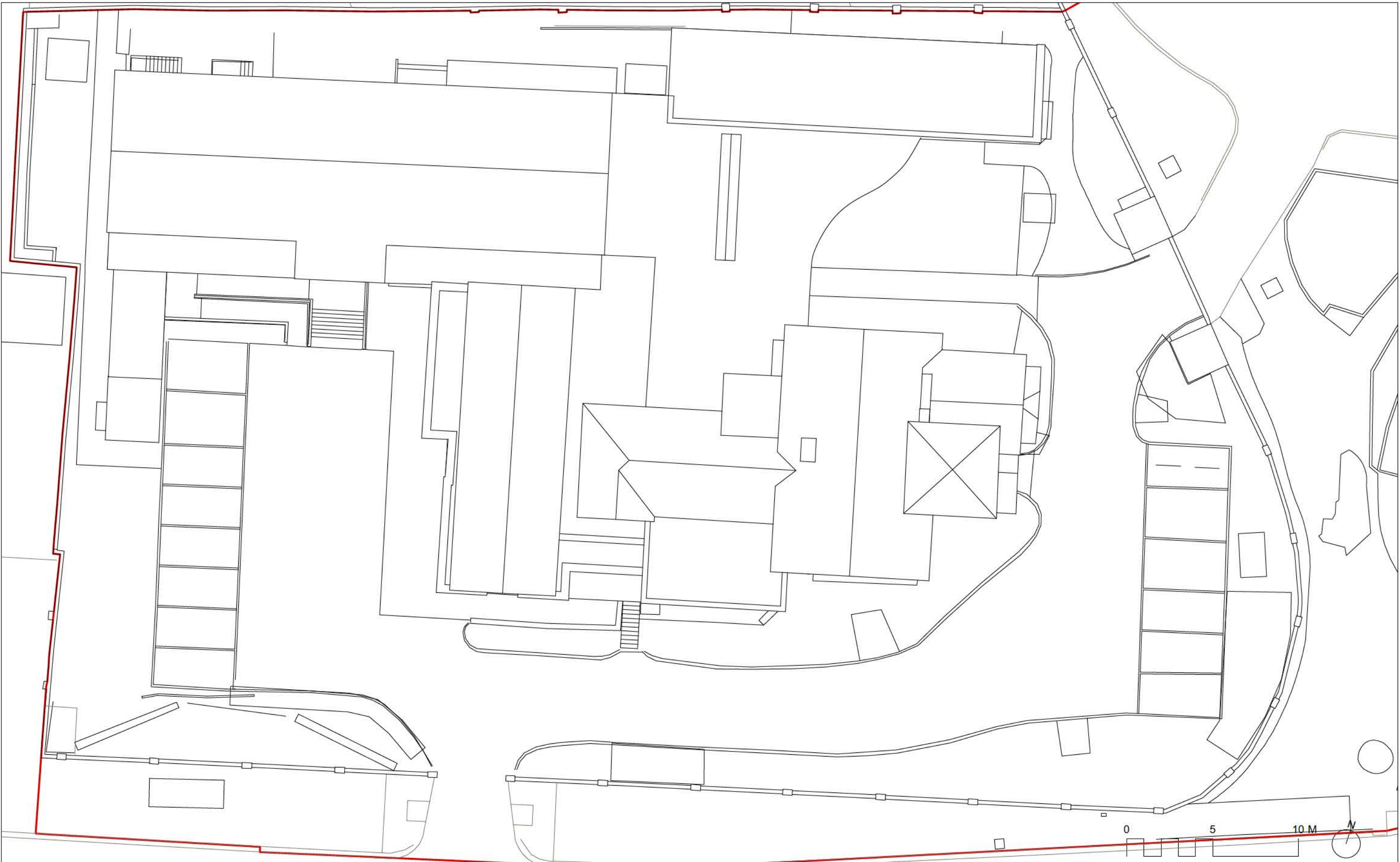
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Second Floor Plan

Drawing No.
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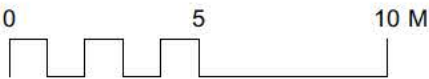
Rev
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Existing
Roof Plan
1:200



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10.01.2020

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WH

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WH

Planning
Drawing Title
Existing
Roof Plan

Drawing No.
01008 1104

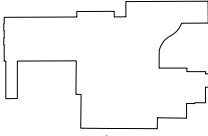
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


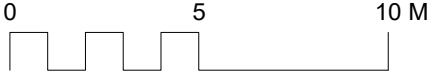
Existing
South Elevation
1:200



South

Diagrammatic Plan 1:2000





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Client
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Brent NW10 8DY

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Scale
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1:200 @ A3

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WH

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WH

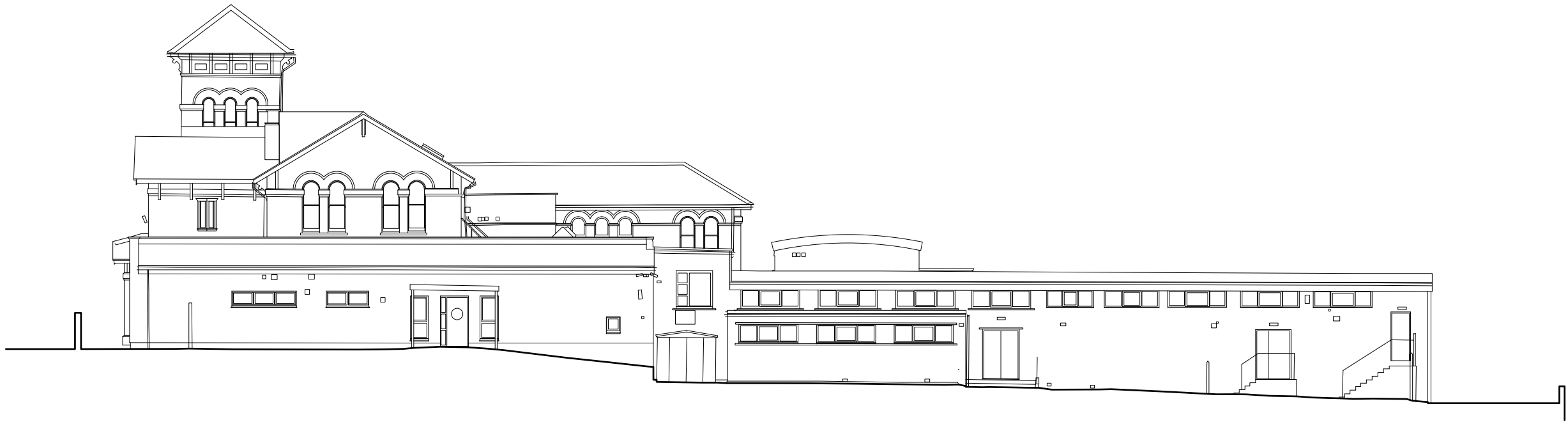
Planning
Drawing Title
Existing South Elevation

Drawing No.
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Existing
North Elevation
1:200

North

Diagrammatic Plan 1:2000

N

0 5 10 M

Rev	Date	Drawn	Comment

Client
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Job
Morland Gardens
Brent NW10 8DY

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10.01.2020

Drawn
AT

Scale
1:100 @ A1
1:200 @ A3

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WH

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WH

Planning
Drawing Title
Existing
North Elevation

Drawing No.
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Rev
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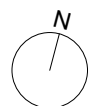
Existing
West Elevation
1:200



Existing
East Elevation
1:200



Diagrammatic Plan 1:2000



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Drawing Title
Existing
East & West Elevations

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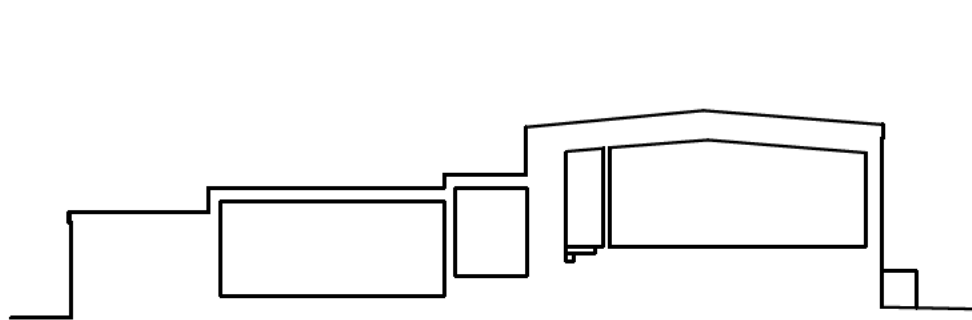
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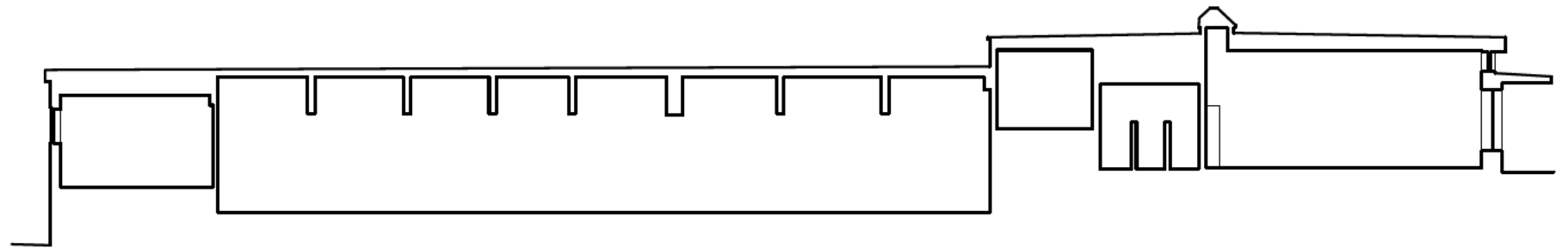
Rev
-

Job
Morland Gardens
Brent NW10 8DY

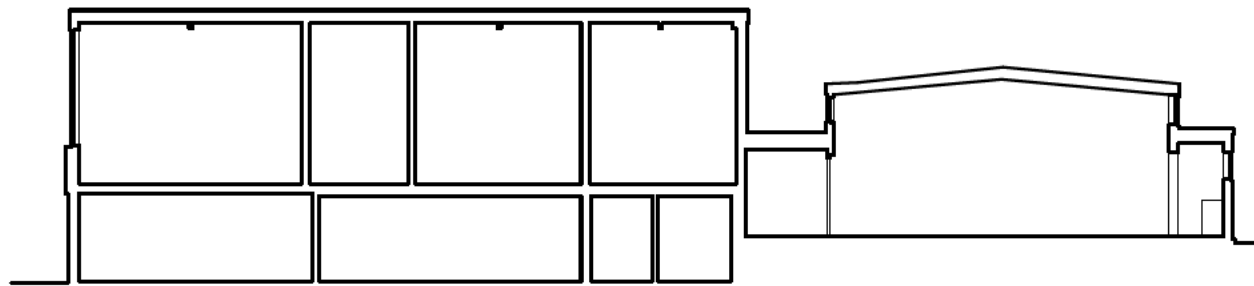
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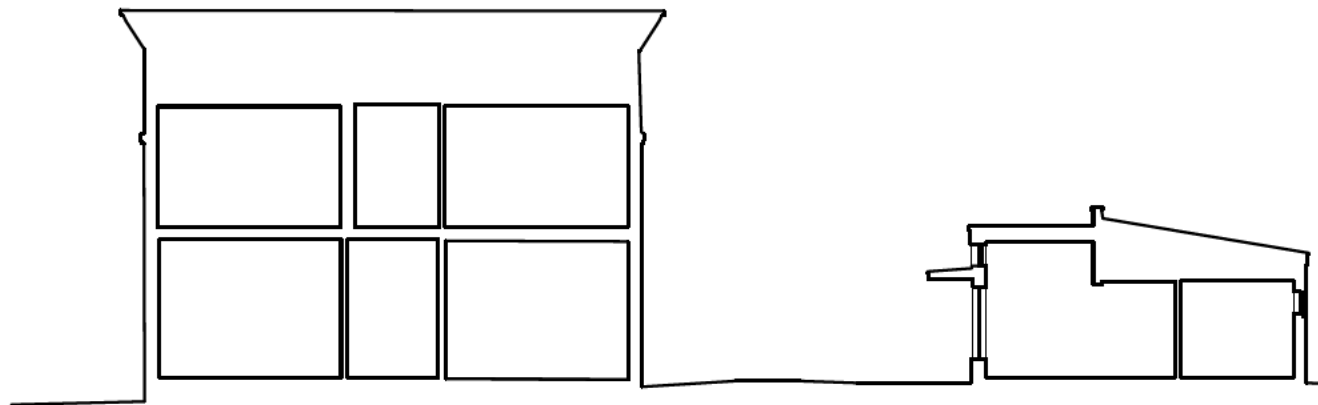
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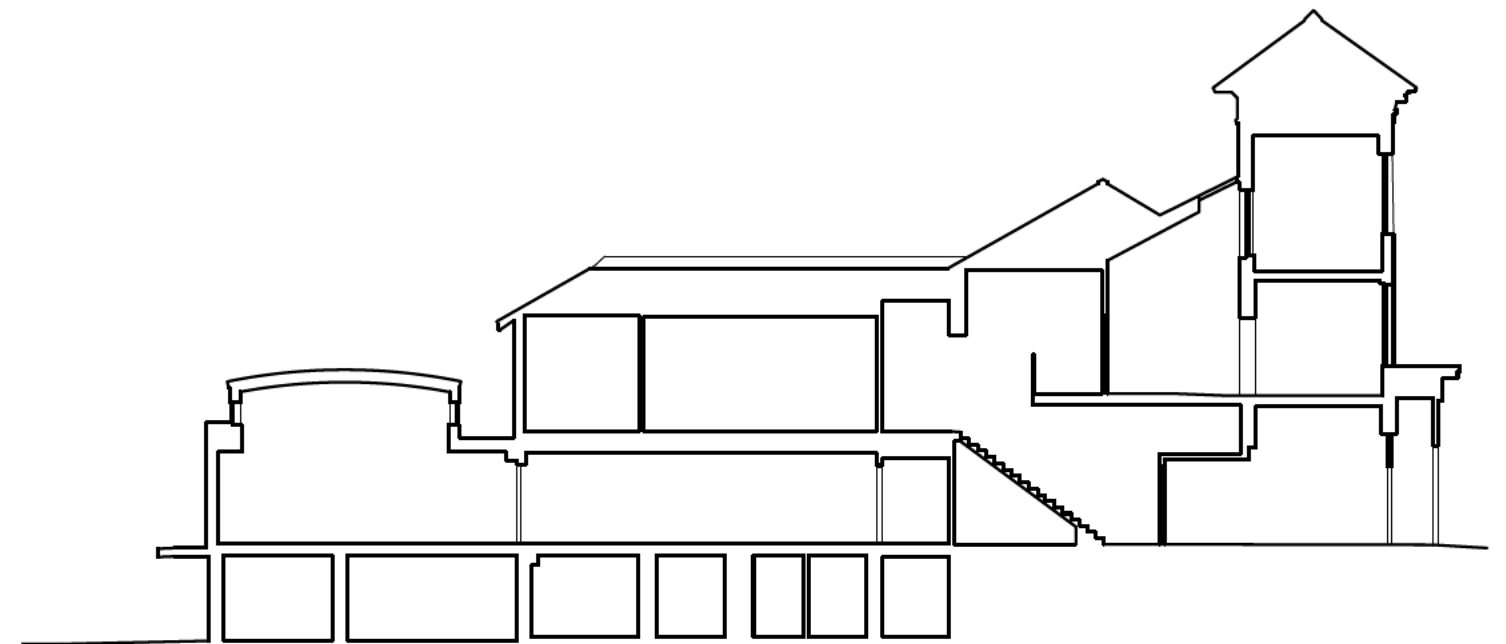
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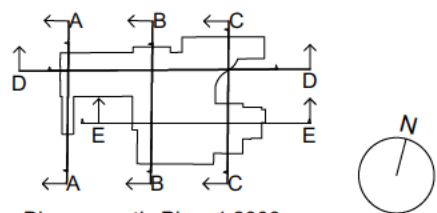
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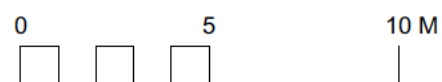
Existing Section C C
1:200



Existing Section E E
1:200



Diagrammatic Plan 1:2000



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Client
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Existing Sections

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