This map is indicative only.
RECOMMENDATION
The Committee resolve to agree in principle to grant conservation area consent, but delegate final determination of the application to the Assistant Director (Planning & Development) subject to:

(a) taking into account any further representations received on or before the 14th February 2013;

(b) any direction by the National Planning Casework Unit, the Secretary of State having considered the matter, to refuse the application.

EXISTING
The Willesden Green library centre is located on the southern side of Willesden High Road immediately to the west of the junction with Brondesbury Park. To the west of the site is Grange Road which is pedestrianised at its northern end.

The very northern section of the site falls within the Willesden Green Conservation Area, with the boundary of the Area falling between the old detached library and the newer library Centre. The detached old library building is a locally listed building.

The existing main library building was built in the mid-1980’s and is considered to have very few redeeming features in terms of its external appearance and relationship with what is around.

There is a large car park to the south of the site that provides a total of 73 parking spaces, vehicular access to which is gained off Brondesbury Park. The existing car park is provided for visitors to the library centre and managed by a system of issuing permits within the centre.

PROPOSAL
See above.

HISTORY
84/1334

Planning permission was granted for the new Willesden Green library centre in 1984. It opened in 1989 and the complex originally included a cinema, an arts complex, cafe/retail space and a bookshop, as well as the library itself. For the information of Members, the Willesden Green Conservation Area was not designated until 1993 and, consequently, the original approval was granted without having to take into account the policy issues that are relevant now and which are discussed below.
This planning application proposed demolishing all buildings on the site and the erection of a new cultural centre, cafe and retail space, along with 92 residential flats. The application was withdrawn on 3 July 2012 prior to a decision being made on it.

This Conservation Area Consent application proposed demolishing the old library building. It was also withdrawn on 3 July 2012.

This planning application to change the use of the ground floor of the Brent archive at 2 Grange Road to a temporary lending library was granted permission on 2 January 2013.

This planning application includes the retention of the original library building at the northern apex of the site, with a new four-storey Cultural Centre building attached to the rear and the erection of 95 flats on the existing car park. A report into this case appears elsewhere on this Agenda.

POLICY CONSIDERATIONS
National Planning Policy

The National Planning Policy Framework (NPPF) was published on 27 March 2012 and replaces Planning Policy Guidance and Planning Policy Statements with immediate effect. Its includes a presumption in favour of sustainable development in both plan making and decision making. It is considered that the saved policies referred to in the adopted UDP and Core Strategy are in conformity with the NPPF and are still relevant. The NPPF states that good quality design and a good standard of amenity for existing and future occupants of land and buildings are required. Of particular reference to this CAC application, the NPPF outlines policies for the historic environment and heritage assets. It emphasises the importance of being able to assess the significance of heritage assets that may be affected by a development.

Accordingly, the policies contained within the adopted SPG’s, London Borough of Brent Unitary Development Plan 2004 and Core Strategy 2010 carry considerable weight in the determination of planning applications and appeals.

Adopted Brent UDP

BE24 Locally Listed Buildings. The special character of buildings on the local list will be protected and enhanced.

BE26 Alterations & Extensions to Buildings in Conservation Areas. They should retain the original design and materials or where not practicable be sympathetic to the original design.

BE27 Demolition & Gap Sites in Conservation Areas. This policy is expanded on in the "Remarks" section below.

SUSTAINABILITY ASSESSMENT
Not applicable.

CONSULTATION
Members will be aware that, as explained above, a proposal for a similar form of development was withdrawn early last year. Although no formal decision was made at that time there was a good deal of concern about the form of development and, as a result, a summary of the initial application is set out below.

Previous Consultation (12/1190 & 12/1191)

Over 750 individual objections to the proposal were received in early 2012 and two petitions incorporating several thousand signatures were also submitted. The main focus of the petitions was opposition to the demolition of the locally listed building and called on the Council to prevent that demolition.
A summary of the content of the main objections is set down below:

- 1 – loss of original locally listed library building.
- 2 – reduction in facilities and loss of particular uses that existed within the building.
- 3 – loss of open public space.
- 4 – car parking issues.
- 5. – loss of the existing car park.
- 5 – impact of housing element on people living nearby.
- 6 – impact on tree to High Road frontage
- 7 – design of the new development and impact on the Willesden Conservation Area.

Consultation on Current Application (12/2924 & 12/2925)

As far as this current application is concerned a total of 2964 consultation letters were sent out on 8 November 2012. This joint letter made reference to both this Conservation Area Consent application, but also the planning application, a report into which appears elsewhere on this Agenda.

For clarity, all those who had submitted a formal response to the first withdrawn scheme were also notified of this second submission.

A total of 18 site notices (which included 9 relating to the Conservation Area Consent application) were posted at various locations around the application site advertising the proposal as a Departure to the Development Plan and affecting a Conservation Area on 13 November 2012. In addition, a Press Notice was published on 15 November 2012.

A further clarification letter was sent out to all third parties who were either on the original consultation list or who weren’t on that list, but had written in subsequently, on 27 December 2012 explaining that the red line application site had been amended to correctly include land to the north of Grange Road within the site, rather than being shown separately as being highway works relating to the development. A further 18 site notices were posted in the locality on 18 January 2013 and a Press Notice appeared on 24 January 2013. There was no change, at all, to the form of the development proposed, which remained unchanged, and the letter simply sought to clarify the question of the application site which was identified in a different way in the original submission.

In response to comments from the GLA (expanded upon in the “Remarks” section) two new pedestrian gates have been introduced to the Block B boundary to Grange Road. Those residents living on the opposite side of Grange Road to these new gates were re-consulted about the change on 24 January 2013.

Representations Received

In terms of considering representations on the proposal it is necessary to set out all those received for the sake of completeness. Although 12/2924 relates to the planning application and 12/2925 to the Conservation Area Consent, the comments received are in certain cases not only about a specific application (ie: comments could have been made about the redevelopment proposals on the Conservation Area Consent application reference) and so all representations are listed in full below.

12/2924

Comments (this option is given on-line) 26
Support 72
Objections 312

12/2925

Comments 3
Support 0
Objections 52

OBJECTIONS

The principal issues that have been raised are set out below:
1. The development would have a detrimental impact on the Willesden Conservation Area. The new library building will over-dominate the area.
2. The new building would lose the sense of openness towards the front of the site that the existing building provides for.
3. The loss of the open space to the front of the existing library is unacceptable in itself. It is well used by the community. The proposed open space is hidden around the back of the new library building and will not be welcoming.
4. Loss of car park to the rear.
5. The residential element would provide for high-density accommodation in an already over-populated area.
7. The facilities in the new building will be less/worse than what is available at present. Existing building should be refurbished, not demolished.
8. The scheme should incorporate affordable housing.
9. No attempt to consult the community on the future of the site. The motives of the Council are questioned and the proposal benefits the Council and the applicants with no benefit to the community.
10. The development will cause traffic problems in the area.
11. To knock a building down only 25 years after it was built is a waste of money.
12. The development would have an unacceptable impact on the existing residents because of its height and its location. Certain residents have a “Right to light” protected by law, although as Members will be aware these are not material planning considerations.
13. The residential element of the proposal is over dense. Too many flats are being proposed.
14. The changes to library services that the Council has undertaken recently mean that the new library here must actually be larger to compensate.
15. No consideration is being given to the cumulative impact of the developments in Willesden Green on services and infrastructure.
16. Lack of continuity of facilities for when the development is taking place.
17. The quality and source of letters supporting the development are questioned.
18. The validation of the application and the consultation undertaken on it are queried.
19. The Council is giving land away to a private developer.
20. The works, and the manner in which they will be carried out (eg: site hoardings) will present a danger to the general public.
21. Health risks from electricity sub-station.

SUPPORT

The following points have been made:

1. Proposal will provide a new library with improved facilities.
2. The development now keeps the locally listed library building which is welcomed.
3. The design of the building is improved.
4. The development will help to regenerate Willesden.
5. The existing facilities (eg: One Stop Shop services) do not provide the level of customer service needed for the future.
6. The existing open space to the front of the library building is not as welcoming as it could be.
7. The new building will be very sustainable and environmentally friendly.

For the information of Members, a large number of the supporting letters were submitted to the Council via the agents acting for the applicant on 14 January 2013. The letters are in semi-template form, in so far as much of the text is the same in each submission. All letters received raising material planning considerations and other issues have been summarised in this section of the report and the planning considerations are discussed more fully in the report below.

Representations from Councillors

Ward Councillors Jones and Hunter have written in supporting the application. Councillor Jones states that she feels that Willesden deserves a higher profile centre with good facilities. Pleased at the retention of the old library. She feels that the rebuilt centre will be a busy and vibrant place, with better services, including more Customer Service desks which are much needed. Councillor Hunter states that whilst she understands the objections to the proposals, she endorses these views and wishes to support the scheme.

Councillor Shaw has written in explaining that she is opposed to the planning application, on the grounds that
it will have an unacceptable impact on her residents.

Members will be aware that in order to give them the best opportunity of appreciating the views expressed in relation to the current scheme a copy of all the representations have been made available for Planning Committee Members at the Town Hall.

Representations from MPs

Sarah Teather MP has written in objecting to the development on the grounds of loss of open space, inappropriate residential development, the loss of the bookshop and Brent Irish Advisory Service, as well as the interim arrangements that will be put in place whilst any new library is being built.

EXTERNAL CONSULTATIONS

VICTORIAN SOCIETY

The Society welcomes the retention of the old library building. They are reassured that the value of the building has finally been recognised. The proposal must include full restoration of the exterior of the building, including reinsertion of front door and authentic colour scheme.

ENGLISH HERITAGE

No objection raised.

REMARKS

This application seeks consent for the partial demolition of the rear part of the old library building in order to facilitate its link to the new Willesden Green Cultural Centre.

Members will be aware that Policy BE27 of the adopted Brent UDP states that consent will not normally be given for the demolition of a building in a Conservation Area, or demolition of part of the building, unless that building positively detracts from the character or appearance of the area. It goes on to say that where demolition is considered to be acceptable, replacement buildings should be seen as a stimulus to imaginative high quality design and an opportunity to enhance the area.

The old library building is a locally listed building, as well as being in the Willesden Conservation Area. A previous proposal (12/1191) on the site envisaged demolishing the building in totality, but was withdrawn prior to formal determination, in order to allow consideration of an approach that allowed the retention of the old library. Obviously, on the basis that the building is locally listed, there is an acknowledgement that it has merit and, therefore, cannot be said to detract from the character or appearance of the Conservation Area.

In broad policy terms, therefore, the scheme does not accord with is UDP policy BE27. Local Authorities are not able to consider their own applications for Conservation Area Consent, along with other types of application, and although Brent Council are not the applicant here, the circumstances of the specific case meant that the judgement was made to refer the matter on. With the previous proposals (12/1190 & 12/1191) which proposed the complete demolition of the locally listed building the issue was very clear that CAC was needed. In this case, it is less so and, consequently, a matter for judgement. The proposal effectively retains the original building, with only a small element of non-original building being removed, but the view was taken to follow the referral route as demolition works, albeit of a later wing, were proposed.

The NPPF makes it clear that when determining applications Local Authorities need to understand the significance of any heritage asset that may be affected by the development. Furthermore, Local Authorities should account for the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation, the positive contribution that conservation of heritage assets can make to sustainable communities, including their economic viability. New development should make a positive contribution to local character and distinctiveness.

In respect of this, a report into the redevelopment of the site appears elsewhere on this Agenda and sets out that the retention of the old library is now a key element of the design approach. Linking the old library with the new WG GCC will be a glazed lobby, aligning with the eaves of the old library building and functioning as the main entrance and community gallery for the new library. Owing to the acknowledged value of the old library building, a historic building appraisal has been carried out to allow an understanding of the impact of the proposal on the building. The appraisal concludes that although the building has an important role within the
wider streetscape which has led it to be considered of local significance this does not extend to national levels of interest.

In terms of considering this status, Members should be made aware that in early 2012, English Heritage, during the time when other alternative approaches to the development of the site were being considered, received a request from, it is understood, a local resident, to designate the Old Library as a listed building. This request was rejected at their Initial Assessment stage (16 May 2012) and the views expressed in that report are of relevance, as far as this Conservation Area Consent application is concerned and, in particular, the consideration of the overall quality of the fabric of the existing building.

The history of the building is referred to in a number of locations within this Agenda, but to re-confirm the position, English Heritage say that the library was built in 1894 by a practice that specialised in public buildings. In 1904 the wings were raised to two storeys and they were demolished in the late 1980’s when the present library was built.

In their May 2012 decision, English Heritage set out the criteria that are used to assess whether, or not, libraries should be listed. Nineteenth century libraries, such as this, need to be externally little altered and have a strong architectural composition to be listed.

Willesden Green library was included in a London-wide survey of 181 pre-1914 public libraries carried out by English Heritage in 1992, which identified 23 buildings of potential special interest. Willesden Green, while noted as being “of some interest” was not among the buildings shortlisted. English Heritage does say that the old library is one of the most distinctive buildings in the area and that it does act as a focal point in the streetscape and Conservation Area. Officers consider that this will continue to be the case with this current scheme, with the vast majority of the old library now being retained and its role within the local area enhanced by what is proposed to happen around it.

The decision not to list the building was because it was considered to fall below the standard for listing for three reasons. They are repeated in full below:

“Architectural interest: as originally conceived and built this was an imaginative design which exploited the corner site to best advantage, aesthetically and functionally. The raising of the wings in 1904, although seamlessly executed, undermined the balance of the composition and it is therefore arguable whether the building would be listable had the wings survived. The architectural quality of the surviving frontage is good, but not sufficiently so as to outweigh the alterations and losses that have taken place overall.

Intactness: the loss of the entrance detracts from the elevation, while the removal of the wings has left the building with a truncated appearance.

Interiors: very few fittings or decorative features appear to survive. The library was notable for its planning, and the loss of the wings containing the main reading rooms has considerably reduced this claim to interest”.

For the information of Members, English Heritage have also been consulted about this current application and, particularly given what is set out above, it is not surprising that they do not object to it. They have confirmed that they are pleased to note that the former Willesden Green Library is retained within this current proposal and that they do not wish to comment in detail on it. They do say that in the event of the Council being minded to grant consent, they feel that particular attention should be given to the quality and appearance of materials and would request that particular consideration is given to the junctions with the retained former Library. English Heritage have confirmed that they do not wish to be consulted again on the proposal.

Officers endorse the views of English Heritage. In terms of the GLA their views on the proposals are set out in full in the report on application 12/2924 but they are considered pertinent to this CAC application and are, therefore, repeated here.

In terms of the old library building they say:

“In contrast to the withdrawn application for the site.........the proposal incorporates part of the original library building and reuses it for its original purpose, as the entrance to the library. This scheme preserves the heritage asset and allows the regeneration of the library and the wider site and the restoration and re-use of the historic building is strongly supported and welcomed.”

As far as urban design issues are concerned:
“The proposed development has the potential to have a transformative impact in the area and the current design successfully maximises the potential of the site, adds to the public realm network in the area and provides an impressive new cultural centre with a strong presence on the High Road”.

“The proposal would provide a positive architectural contrast to its setting. The current 1980’s building is a poor pastiche that detracts from the character of the conservation area and the surrounding townscape. The new building creates a strong identity that clearly signposts the civic function of the building and also civic pride in the building. The clear and bold articulation of the elevations captures the self-confident spirit of the areas original Edwardian character and would signpost its rejuvenation”.

What these external bodies are confirming is that although still playing an extremely important role in Willesden Green, the old library was substantially reduced in architectural value following works that were undertaken to it in the 1980’s. The planning application proposal allows the building to be retained, and its role actually enhanced within the wider regeneration proposals in a sustainable way.

In terms of the works that are required to allow the proposals to take place, the research mentioned above has confirmed that the Old library, as exists at present, is a small proportion of what was a much larger library built in 1894. This original building was changed significantly in the late 1980’s when a large amount of the original fabric was removed at the time the existing library building was built. Detailed work has been undertaken in order to confirm that the only portion of the original Old library that is still standing is approx. 25% of the existing High Road facade and there is a similarly small amount of internal works retained. The side and rear elevations of the building that exist at the moment, although built in a fairly successful attempt to match the original building, were actually built as recently as the 1984 planning approval.

As explained elsewhere, the key change to the approach to the development of the site arose around the retention of the majority of the old library facade. The historic building appraisal has provided a guide to the elements that contribute to the significance of the building, most notably the northern elevations. The majority of the external facade has now been retained in this scheme with consent been required for the demolition of the small staircase area to the rear of the building. Works will take place within the old library building to remove the existing staircase, along with internal walls and floors, in order to create the large, open space that will form an important part of the new library centre. For clarity, no planning consent is required for these internal works as the building is not listed.

Taking all matters into account, it is considered that the small element of the existing old library building that is to be demolished here, when considered in the context of the phasing analysis of the historic development of the site, does not enhance the character or appearance of this part of the Willesden Conservation Area such that it should be retained. As a result, there is no objection in principle to their removal. Indeed, as explained in the report elsewhere on the Agenda looking at the redevelopment of the site, and acknowledged by the GLA, it is considered that a redevelopment of the site would result in a visual improvement in this prominent town centre location, providing for a high quality, although clearly modern, replacement building.

However, the demolition of the buildings should not be allowed in the absence of an acceptable replacement scheme and this should be made a condition of any approval. Furthermore, as explained elsewhere, the decision to grant Conservation Area Consent cannot be made by the Council in this case and the matter needs to be referred onto the National Planning Casework Unit for their ultimate consideration.

**RECOMMENDATION:**  Grant Consent

**REASON FOR GRANTING**

1. The proposed development is in general accordance with policies contained in the:-
   - Brent Unitary Development Plan 2004
   - Core Strategy.
   - London Plan.

   Relevant policies in the Adopted Unitary Development Plan are those in the following chapters:-
Built Environment: in terms of the protection and enhancement of the environment

CONDITIONS/REASONS:

(1) The works to which this consent relates must be begun not later than the expiration of three years beginning with the date of this consent.

Reason: To conform with the requirements of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

(2) The development hereby permitted shall be carried out in accordance with the following approved drawing and documents:

Ref. 11034_(EX)_0001 03 – Site Location Plan
- Ref. 11034_(EX)_0002 02 – Site Allocation Plan
- Ref. 11034_(EX)_0010 02 – Masterplan: Existing Site Plan
- Ref. 11034_(EX)_0015 02 – Cultural Centre: Existing Site Plan
- Ref. 11034_(EX)_0020 02 – Residential: Existing Site Plan
- Ref. 11034_(PL)_1000 02 – Cultural Centre: Existing Ground Floor Plan
- Ref. 11034_(PL)_1010 02 – Cultural Centre: Existing First Floor Plan
- Ref. 11034_(PL)_1020 02 – Cultural Centre: Existing Second Floor Plan
- Ref. 11034_(PL)_1030 02 – Cultural Centre: Existing Roof Plan
- Ref. 11034_(PL)_2000 02 – Masterplan: Existing Street Elevations
- Ref. 11034_(PL)_2001 02 – Masterplan: Existing Street Elevations
- Ref. 11034_(PL)_2002 02 – Masterplan: Existing Street Elevations
- Ref. 11034_(PL)_4010 02 – Masterplan: Proposed Demolition Plan
- Ref. 11034_(PL)_4015 02 – Cultural Centre: Proposed Demolition Plan
- Ref. 11034_(PL)_4020 02 – Residential: Proposed Demolition Plan
- Ref. 11034_(PL)_0010 03 – Masterplan: Proposed Site Plan Ground Level
- Ref. 11034_(PL)_0011 03 – Masterplan: Proposed Site Plan First Floor Level
- Ref. 11034_(PL)_0012 03 – Masterplan: Proposed Site Plan Roof Level
- Ref. 11034_(PL)_1000 03 – Cultural Centre: Proposed Ground Floor Plan
- Ref. 11034_(PL)_1010 03 – Cultural Centre: Proposed First Floor Plan
- Ref. 11034_(PL)_1011 03 – Cultural Centre: Proposed First Floor Plan
- Ref. 11034_(PL)_1020 03 – Cultural Centre: Proposed Second Floor Plan
- Ref. 11034_(PL)_1021 03 – Cultural Centre: Proposed Second Floor Plan
- Ref. 11034_(PL)_1030 03 – Cultural Centre: Proposed Third Floor Plan
- Ref. 11034_(PL)_1031 03 – Cultural Centre: Proposed Third Floor Plan
- Ref. 11034_(PL)_1040 03 – Cultural Centre: Proposed Roof Plan
- Ref. 11034_(PL)_1041 03 – Cultural Centre: Proposed Roof Plan
- Ref. 11034_(PL)_2000 03 – Masterplan: Proposed Street Elevations
- Ref. 11034_(PL)_2001 03 – Masterplan: Proposed Street Elevations
- Ref. 11034_(PL)_2002 03 – Masterplan: Proposed Street Elevations
- Ref. 11034_(PL)_2011 03 – Cultural Centre: Proposed Elevations
- Ref. 11034_(PL)_2012 03 – Cultural Centre: Proposed Elevations
- Ref. 11034_(PL)_3000 02 – Masterplan: Proposed Site Sections
- Ref. 11034_(PL)_3010 02 – Cultural Centre: Proposed Section AA
- Ref. 11034_(PL)_3011 02 – Cultural Centre: Proposed Section BB
- Ref. 11034_(PL)_4000 02 – Cultural Centre: Detail Bay Study - East Willesden Green Cultural Centre & Residential Development

Residential
- Ref. 2012-100 PS - RESIDENTIAL: GROUND FLOOR PLAN
- Ref. 2012-101 PR - RESIDENTIAL: FIRST FLOOR PLAN
- Ref. 2012-102 PQ - RESIDENTIAL: PROPOSED SECOND FLOOR PLAN
- Ref. 2012-103 PQ - RESIDENTIAL: PROPOSED THIRD FLOOR PLAN
- Ref. 2012-104 PP - RESIDENTIAL: PROPOSED FOURTH FLOOR PLAN
- Ref. 2012-105 PM - RESIDENTIAL: PROPOSED ROOF PLAN
- Ref. 2012-106 PG - RESIDENTIAL: PROPOSED STREET ELEVATIONS
- Ref. 2012-107 PH - RESIDENTIAL: BLOCK A – ELEVATIONAL TREATMENT
- Ref. 2012-108 PG - RESIDENTIAL: PROPOSED ELEVATIONS BLOCK B
Reason:  For the avoidance of doubt and in the interests of proper planning.

(3)  The demolition works hereby approved shall not be allowed in the absence of an acceptable replacement scheme.

Reason:  In the interest of the visual amenity and character of the Conservation Area, in general, and this building, in particular.

INFORMATIVES:

None Specified

Any person wishing to inspect the above papers should contact Andy Bates, The Planning Service, Brent House, 349 High Road, Wembley, Middlesex, HA9 6BZ, Tel. No. 020 8937 5228