**Project Title:** Redevelopment of Stonebridge Primary School and Hillside

**Client:** London Borough of Brent

<table>
<thead>
<tr>
<th>Version</th>
<th>Date</th>
<th>Version Details</th>
<th>Prepared by</th>
<th>Checked by</th>
<th>Approved by</th>
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<td>V1</td>
<td>21/12/2015</td>
<td>Draft</td>
<td>Jonny Hill</td>
<td>Jon Grantham</td>
<td></td>
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<tr>
<td>V2</td>
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<td>Jonny Hill</td>
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</table>
Stonebridge Primary School and Hillside Redevelopment

Planning Statement
Prepared by LUC on behalf of London Borough of Brent’s Capital Projects Team
January 2016
## Project Team

<table>
<thead>
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<thead>
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| Southstudio Architects  
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<table>
<thead>
<tr>
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</tr>
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1 Introduction

1.1 This Planning Statement accompanies a hybrid planning application which seeks full planning permission for:

- the expansion of Stonebridge Primary School from a 2-form to a 3-form entry primary school;
- the reconfiguration of Shakespeare Avenue to connect to Hillside; and
- the creation of 1.2ha of public open space (see drawing 016 003).

1.2 The hybrid planning application is also seeking outline planning permission with all matters reserved for the construction of 73 residential units on Hillside and Milton Avenue (see drawing 016 003). A breakdown of the residential units is provided in Section 4 of this Statement.

1.3 The Statement should be read in conjunction with the Design and Access Statements which accompany this planning application.

1.4 Reference is made throughout the Statement to drawings that form part of the planning application package. The full list of submitted drawings is set out in Table 1.1.

Table 1.1: Schedule of Drawings

<table>
<thead>
<tr>
<th>Drawing</th>
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<tbody>
<tr>
<td>016 001</td>
<td>Site Location Plan</td>
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<tr>
<td>016 002</td>
<td>Existing Site Plan</td>
</tr>
<tr>
<td>016 003</td>
<td>Proposed Site Plan</td>
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<tr>
<td>016 010</td>
<td>Phasing Plan</td>
</tr>
<tr>
<td>016 020</td>
<td>Existing Former Adventure Playground – Ground Floor and Mezzanine Plans</td>
</tr>
<tr>
<td>016 021</td>
<td>Existing Former Adventure Playground – Roof Plan</td>
</tr>
<tr>
<td>016 022</td>
<td>Existing Former Adventure Playground – Elevations AA and BB</td>
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<td>016 023</td>
<td>Existing Former Adventure Playground – Elevations CC and DD</td>
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<td>016 090</td>
<td>Proposed Demolition Site Plan</td>
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<td>016 091</td>
<td>Main School Building – Proposed Demolitions Ground Floor Plan and Ground Floor Mezzanine</td>
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<td>Main School Building – Proposed Demolitions First Floor Plan and First Floor Mezzanine</td>
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<td>Main School Building – Proposed Demolitions Second Floor Plan</td>
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<td>016 094</td>
<td>Shed and WC Block – Proposed Demolitions Ground Floor Plan</td>
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<td>016 095</td>
<td>Former Welsh School – Building B – Proposed Demolitions Ground Floor Plan</td>
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<tr>
<td>016 096</td>
<td>Former Adventure Playground – Proposed Demolitions Ground Floor Plan</td>
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<td>Proposed First Floor Plan</td>
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<td>016 102</td>
<td>Proposed Second Floor Plan</td>
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<td>016 103</td>
<td>Proposed Roof Plan</td>
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<td>016 200</td>
<td>Proposed Elevation AA</td>
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<td>016 201</td>
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<td>Proposed Section CC</td>
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<td>016 303</td>
<td>Proposed Section DD</td>
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<td>016 400</td>
<td>Main School Building – Proposed Ground Floor Plan Stair and Lift Core</td>
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<td>016 810</td>
<td>Hillside – Proposed Sections AA and BB</td>
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<td>016 900</td>
<td>Milton Avenue – Proposed Ground Floor Plan</td>
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This Statement comprises the following six sections:

- 1: Introduction
- 2: The Site
- 3: Background to Application and Planning History
- 4: The Proposed Scheme
- 5: Statement of Community Involvement
- 6: Planning Policy Appraisal

In addition to this Statement, the application is supported by the following documents:

- Design and Access Statement: Stonebridge Redevelopment and Surrounding Lands – Masterplan and Housing at Hillside and Milton Avenue
- Design and Access Statement: Stonebridge Redevelopment and Surrounding Lands – Stonebridge Primary School
- Landscape Concept Report
- Pre-Development Arboricultural Survey
- Preliminary Ecological Assessment
- Daytime Bat Survey
- Nocturnal Emergence and Dawn Bat Survey
- Transport Assessment
- Travel Plan – Stonebridge Primary School
- Travel Plan – Residential Open Land (Hillside)
- Travel Plan – Retail (Hillside)
- Travel Plan – Residential Milton Avenue
- BREEAM Pre-Assessment
- Sustainability Statement
- Energy Statement
- Ventilation Statement
- External Lighting Statement
- Water Statement
- Acoustic Design Review Report
- Flood Risk Assessment
2 The Site

2.1 The proposed scheme is located in Stonebridge and the site totals an area of approximately 2.5ha and is illustrated in Figure 2.1.

![Figure 2.1: Site Location](Source: DigitalGlobe, GeoEye, Microsoft, CNES/Airbus DS 2015)

2.2 The site is formed of four land uses including Stonebridge Primary School (use class D1), the Former Adventure Playground (use class D1), public open space and wasteland (which is currently fenced off).

2.3 Hillside (A404) runs along the northern boundary of the site which provides access to Stonebridge Primary School via Wesley Road and Shakespeare Avenue which are both no through roads. To the east and south of the site are residential properties in the form of two-storey terraced houses and three/four-storey apartment blocks. To the west of the site is Our Lady of Lourdes Catholic Primary School.

2.4 The site is located approximately 530m to the northwest of Harlesden Rail Station and 880m to east of Stonebridge Park Rail Station. Both stations are served by London Overground and Underground services.

2.5 Running north-south within the eastern boundary of the site is a canal feeder connecting the River Brent to the Grand Union Canal. The feeder is designated as a Site of Borough Importance for Nature Conservation (SBINC) Grade II.

2.6 Stonebridge Primary School is Grade II curtilage listed and comprises the main school building, the former caretaker’s house, playground shelter and cookery and laundry, former manual instruction room and playground shelter and boundary walls, gates and railings.

2.7 The site is not considered to be at risk of flooding as defined on the Environment Agency’s Flood Risk Map.

2.8 Figure 2.2 illustrates the site in further detail.
Figure 2.2: Extract of Location Plan (Source: Drawing 016 001, Southstudio Architects)
3 Background to Application & Planning History

Background to the Proposals

Stonebridge Primary School

3.1 The case for permanently expanding Stonebridge Primary School to a 3-form entry school is set out in a report which was considered by Brent Cabinet on 1 June 2015 – see Appendix 1. A summary of the report is provided below.

3.2 In October 2014, LBB approved a new School Place Planning Strategy which established the need for a continuing programme of provision of additional school places. The Strategy was updated in November 2015 and identified a requirement to provide 23 additional primary forms of entry by 2018 which is in accordance with the Greater London Authority (GLA) roll projections. The Strategy set out which Schools were identified for expansion, including Stonebridge Primary School.

3.3 Stonebridge Primary School was identified as a school to expand as it is in accordance with the principles set out within the Strategy, including Principle 1: “we will only undertake expansions of good or outstanding schools where leadership is secure”¹, as described below:

“Stonebridge Primary School was judged Good by the Office for Standards in Education (Ofsted) at the inspection in March 2013. Pupils of Stonebridge Primary are attaining higher results year on year. The percentage of Key Stage One pupils attaining Level 2 and above in reading, writing and national curriculum tests has increased by at least 2 per cent between 2013 and 2014, and in mathematics assessments have seen improvements of 15 per cent in the same period.

The school utilises effective methods for closing the gap between disadvantaged and other pupils. In 2014, 100 per cent of disadvantaged pupils achieved expected progress.

The Brent Schools Partnership has recognised Stonebridge Primary as a Specialist Centre for Safeguarding. Becoming a specialist centre gives Stonebridge a leading role in working with a number of agencies to share good practice and ensure a safe learning environment for all children. This includes offering child protection training for others.

In order to become a Specialist Centre, Stonebridge Primary School provided evidence of its successful safeguarding practices and demonstrated its track record for supporting other schools.”

Pressure on Primary School Places

3.4 The current permanent capacity of Stonebridge Primary School is 420. To meet additional demand, from autumn 2012 Stonebridge Primary School commenced accepting pupils in a temporary annexe building which has a capacity of 180 places at a site known as the Former Day Centre on Twybridge Way – see planning permission – 12/2820 below. As of June 2015, there were 748 children in Brent being educated temporarily in offsite annexes and such temporary provision is neither educationally desirable nor cost effective. The Council wants to reduce its reliance on this provision by providing sufficient flexibility in the permanent provision on school sites. In recognition of this and the projected growth in primary cohort size from Reception to Year 6, Cabinet recommended, in October 2014, that Brent should aim to maintain a 5% surplus in Reception places. The current Reception place surplus across the Borough is 2.02%.

3.5 Brent Cabinet approved the permanent expansion of Stonebridge Primary School and the decision can be found on LBB’s Democracy webpage².

¹ This principle was amended to “we will only undertake expansions at high quality or improving schools where leadership is secure” as per the School Place Planning Strategy 2014-2018 – update.

² Brent Cabinet Decision: Permanent expansion of Stonebridge Primary School to 3-form entry - http://democracy.brent.gov.uk/ieDecisionDetails.aspx?AIId=15815
Hillside, Milton Avenue and the Former Day Centre

3.6 As part of the redevelopment of Stonebridge Primary School, LBB took the opportunity to fully integrate the School into the surrounding area, subsequently, a Masterplan was prepared. The Masterplan seeks the redevelopment of land at Hillside and Milton Avenue to provide new homes. Also, a new high quality public open space is proposed.

3.7 In addition, the masterplan seeks the expansion of Stonebridge Primary School which will allow the School to transfer 180 pupils currently being taught at Stonebridge Primary School Annexe located at the Former Day Centre to the main School on Shakespeare Avenue. Subsequently, this will enable the Former Day Centre to be redeveloped for much needed housing comprising market housing and New Accommodation for Independent Living (NAIL) which provides self-contained supported accommodation for adults with physical and learning impairments. This type of accommodation is in demand within Brent as outlined in Brent’s Adult Social Care – Market Development Strategy.

3.8 An outline application for the redevelopment of the Former Day Centre was submitted at the same time as this hybrid application and neither scheme can come forward without the other as they are intrinsically linked, i.e. the residential development of Hillside, Milton Avenue and the Former Day Centre will contribute towards the costs of the expanding Stonebridge Primary School and the expansion of Stonebridge Primary School will enable the School to accommodate the bulge classes at the Former Day Centre (currently being used as Stonebridge Primary School as an annexe site) releasing the Former Day Centre for residential development.

3.9 The applications therefore have to be considered together.

3.10 The case for redeveloping Hillside, Milton Avenue and the Former Day Centre is set out in a report which was considered by Brent Cabinet on 23 February 2015 – see Appendix 2.

3.11 Brent Cabinet approved the principle of the redevelopment of Hillside, Milton Avenue and the Former Day Centre and the decision can be found on LBB’s democracy webpage.

Planning History

3.12 There have been a number of decisions by LBB relating to the proposed scheme, those of relevance are summarised below.

Table 3.1: Relevant Planning History

<table>
<thead>
<tr>
<th>Case No.</th>
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<th>Decision</th>
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<tr>
<td>14/4072</td>
<td>Listed Building Consent for the replacement and renewal of windows with associated alterations to main building and caretaker’s house, including the installation of x5 extract fans, stone and brick cleaning and repair, repair and renewal of rainwater goods, removal of redundant dumb waiter, tile repairs, and alterations to the former Pupil Referral Unit building to include window and door repairs, renewal of tile roof, lead roofs and lead dormer roofs and asphalt</td>
<td>Approved December 2014</td>
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3 Details of the Masterplan can be found in the Design and Access Statement: Masterplan and Housing at Hillside and Milton Avenue.
<table>
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<td>14/4071</td>
<td>Replacement and renewal of windows with associated alterations to main building and caretaker’s house, including the installation of x5 extract fans, stone and brick cleaning and repair, repair and renewal of rainwater goods, removal of redundant dumb waiter, tile repairs, and alterations to the former Pupil Referral Unit building to include window and door repairs, renewal of tile roof, lead roofs and lead dormer roofs and asphalt repairs</td>
<td>Approved December 2014</td>
</tr>
<tr>
<td>12/2820</td>
<td>Remodelling of the existing Stonebridge Centre, to provide a new educational facility to be used as an extension of the established Stonebridge Primary School. Works include the resurfacing and landscaping of external areas to provide play areas, the installation of new fencing, new pedestrian gates and new doors to the existing building.</td>
<td>Approved January 2013</td>
</tr>
<tr>
<td>12/2411</td>
<td>Proposed boundary fence to the School</td>
<td>Approved October 2012</td>
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<tr>
<td>97/0188</td>
<td>Erection of 2.1m high railing fence to the boundary of School</td>
<td>Approved March 1997</td>
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<td>96/1017</td>
<td>Construction of an outdoor games area to the rear of the School</td>
<td>Approved October 1996</td>
</tr>
<tr>
<td>84/0192</td>
<td>Erection of a detached nursery</td>
<td>Approved May 1984</td>
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<tr>
<td>84/2191</td>
<td>Erection of a single-storey building to provide recreation facilities, storage and office accommodation (Adventure Playground)</td>
<td>Approved February 1985</td>
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4 The Proposed Scheme

4.1 The proposed scheme can be broken down into five components, three of which are seeking full planning permission and two are seeking outline permission with all matters reserved:

**Full Planning Permission**
- The expansion of Stonebridge Primary School from a 2-form to 3-form entry school.
- The reconfiguration of Shakespeare Avenue to connect to Hillside.
- The creation of 1.2ha of public open space.

**Outline Planning Permission**
- The construction of 51 residential units (use class C3) and 246m² of A3 floorspace on Hillside.
- The construction of 22 residential units (use class C3) on Milton Avenue.

Stonebridge Primary School Expansion

4.2 The proposed scheme seeks the redevelopment of Stonebridge Primary School from a 2-form entry to 3-form entry school, increasing its roll from 600$^5$ to 630 pupils. It comprises the construction of a new two-storey building which will provide new nursery and reception teaching facilities at ground floor and years 1 and 2 teaching facilities at first floor. A large assembly hall is also proposed which is intended to be a multi-purpose space. The new building will be linked to the existing School building via a first floor walkway which will allow users to travel between each building without having to walk outside. **Drawings 016 100 to 016 103 and 016 200 to 016 204** illustrate the proposed building.

4.3 A number of alterations are proposed to the Grade II listed School building to ensure that it is fit for 21st century primary school education. Works include rationalising internal circulation through the creation of a new staircase and lift shaft in a central bay on all three floors. The new staircase will also form the point of connection at first floor level to the new building via the first floor walkway. These works will have a limited impact on the original fabric of the listed building as only half of one structural floor bay over two intermediate floors will be removed.

4.4 The new staircase and lift lobby will also serve as the reoriented entrance for pupils and visitors into the building. The non-original existing double door in this area will be replaced with a window and a new double doorway created in the adjacent existing window.

4.5 The current main entrance on the west elevation facing the car parking area will revert to a secondary entrance for staff and service deliveries.

4.6 Additional WC's will also be provided which will be located within the existing staircase towers.

4.7 Details of these amendments are illustrated on **drawings 016 400 to 016 404 and 016 410**.

4.8 The School playground has been reconfigured to provide a fully integrated learning area for pupils. Two multi-use games areas (MUGA) will be constructed in the eastern corner of the site and a new playground will be laid with colourful thermoplastic play markings. Play surfacing will also be installed constructed of tiger mulch recycle bound rubber and paths linking the new playground character areas will be constructed of self binding gravel. The new hard landscaping will be complemented by a high quality soft landscape comprising wildflower meadow turf, general amenity turf, ornamental planting and trees – including deciduous, evergreen and orchard trees.

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$^5$ Note – this includes the 180 pupils currently being educated at the Stonebridge Primary School Annexe.
4.9 Details of the proposed landscaping of the playground can be found in the Landscape Concept Report and illustrated on drawings (90)LP001 and (90)LP003.

**Reconfiguration of Shakespeare Avenue**

4.10 The proposed scheme will reconfigure Shakespeare Avenue so that it connects Hillside to Wesley Road. The carriageway will be 6.4m wide and will be one-way with traffic entering Hillside and exiting via Wesley Road. Traffic calming measures will be installed adjacent to the proposed School pedestrian entrance which comprises a designated crossing point which reduces the carriageway width to 3.4m – see Appendix G of the Transport Assessment.

4.11 Shakespeare Avenue will provide access to the basement car parking of the proposed Hillside residential development and continue to provide vehicular access for School staff and servicing.

4.12 A loading bay will be provided for servicing and refuse collection on the eastern side of the realigned Shakespeare Avenue which will serve the Hillside residential development. Parents will be able to drop off/pick-up their children along Shakespeare Avenue which will be marked with a time limited single yellow line.

4.13 See the Design and Access Statement: Stonebridge Primary School, Transport Assessment and drawings 016 003 accompanying this application for further information.

**Creation of Public Open Space**

4.14 The proposed scheme includes the creation of a new high quality 1.2ha public open space as illustrated on drawing 016 003. The proposed open space will provide a high quality space seamlessly connecting the proposed scheme with the surrounding uses. It will be made up of number of key gateways which will welcome users to the space as well as seating and picnic areas, outdoor gym, community garden, gathering spaces and playground areas for 0-6yrs and 6-14yrs. The proposals also include the naturalisation of the canal feeder as it will be broken out of its current steel and concrete culverts and a more natural course will be created. A new deck will be installed along part of the new canal feeder which will be a feature of interest within the open space. High quality deciduous, evergreen and orchard trees will be planted which will be complemented by wildflower meadow turf, community garden beds, general amenity turf, ornamental planting and riverside planting. Furniture to be erected and provided within the open space includes timber benches, granite seating walls, timber picnic tables, litter bins, bicycle stands, new timber bridges, educational signage and a community garden notice board.

4.15 Details of the proposed open space can be found in the Landscape Concept Report and illustrated on drawings (90)LP001 and (90)LP003.

**Hillside and Milton Avenue Residential Development**

4.16 This hybrid planning application seeks outline planning consent for the development of 73 residential units with all matters reserved with the exception of the access arrangements to Hillside which are set out above. Table 4.1 provides the breakdown of units.

<table>
<thead>
<tr>
<th>Table 4.1: Breakdown of Residential Units</th>
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<tr>
<td>Tenure of Residential Units</td>
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### Size and Type of Residential Unit

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<td>Milton Avenue</td>
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<td>0</td>
<td>4</td>
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</table>

| Total                     | 73            |

**Hillside**

4.17 The indicative design of the Hillside scheme is a rectangular building stepped in height from a maximum of six storeys above ground to three and four storeys above ground.

4.18 The majority of residences will have dual aspects facing south, southeast or southwest. North facing units will also be provided with dual aspects and, where possible, inset external private balconies.

4.19 Level access will be provided to all external entrances and separate DDA compliant lift cores will be located within the ground floor entrance lobbies. The lift and stair cores will serve all floors, including the residents' basement car parking area which will include disabled parking bays.

4.20 No private amenity space will be provided at ground floor level. Instead, entrances on the south and southeast elevations will provide direct access onto the proposed open space and large south facing, landscaped terraces will be provided at first floor level, accessible from within the building.

4.21 A 246m² community café (use class A3) will be located on the ground floor adjacent to the reconfigured Shakespeare Avenue. Servicing to the unit will be provided via the basement car parking area and deliveries will be made via Hillside – see drawing 016 800.

4.22 Landscaping immediately adjacent to the proposed building will complement the existing and proposed open space including the provision of specimen trees set in an open grassed setting on the elevations away from Hillside.

4.23 The existing footpath along Hillside will be enhanced and widened and a number of specimen trees will be planted to soften the kerbside appearance of the building. All existing category A trees within the site will be retained at the east and west boundaries.

4.24 Hard surfacing will be provided around the communal residential entrances and the community café in the form of permeable sets of pavers.

4.25 All residential parking will be onsite contained within a basement level accessible via the reconfigured Shakespeare Avenue. Bicycle storage will also be provided within the basement car parking area at a ratio of one space per 1-bed flat and two spaces per 2 and 3-bed flat.

4.26 Communal bin storage space will be provided for recyclable and non-recyclable waste near to communal circulation cores on the ground floor. Adjacent to the bins additional lockable space will be provided for items of bulky waste. Dedicated waste storage space will also be provided within the curtilage of Community Café which will be within 10m of a servicing bay.

4.27 See the Design and Access Statement: Masterplan and Housing at Hillside and Milton Avenue and drawings 016 800, 016 801 and 016 810 accompanying this application for further information.

**Milton Avenue**

4.28 The Milton Avenue scheme will consist of the construction of 22 three storey terraced houses. The new terrace will face south onto Milton Avenue providing each unit with dual aspects with the north elevations facing into rear gardens, a minimum of 10m in length.
The proposed units will be set back from the pavement line to provide sufficient waste storage space within the curtilage of each unit and provide the opportunity for planting along the street edge. Front boundary treatments will consist of brick walls below railings integrated with shrub planting.

Trees will be removed as a result of the scheme and it is proposed that two symmetrical groups of specimen trees will be planted along the existing line of the footpath kerb. The existing footpath will be resurfaced with high quality materials and tree pits will be installed to ensure any new planting has sufficient space to grow and not damage the proposed footpath surface.

Vehicular access to the residential units will be provided from Milton Avenue. Car parking will be provided in the form of on-street parking at a ratio of one space per unit. Secure bicycle storage will be provided within the front garden of each unit.

Space to store recyclable and non-recyclable waste will be provided within each plot.

See the Design and Access Statement: Masterplan and Housing at Hillside and Milton Avenue and drawings 016 900 and 016 910 accompanying this application for further information.

**Affordable Housing**

The affordable housing component of this application must be considered together with the provision provided at the Former Day Centre as one development cannot come forward without the other, as discussed in Section 3 of this Statement and the Design and Access Statement: Masterplan and Housing at Hillside and Milton Avenue.

In total, 128 residential units will be provided across the two sites and 45 will be affordable housing and are anticipated to be for rent at up to 80% of the market rent value. This equates to 35% across the two sites.

This is below the 50% required by Brent’s Core Strategy policy CP2 Population and Housing Growth. The reasons for this are two-fold:

- 28 of the affordable units will be NAIL housing which requires a large amount of communal space for this specific supported housing. As such, if the NAIL housing was replaced by standard affordable units, approximately 7 more units would be available for development at the Former Day Centre.
- A development appraisal has been completed using ProVal software to demonstrate that the proposed level of affordable housing is the maximum reasonable level that can be viably delivered by the scheme given the requirement to fund the expansion of Stonebridge Primary School, the proposed highways works and provision of a high quality public open space. The results of the ProVal appraisal have been submitted to Brent Council as a confidential annex for reasons of commercial sensitivity.

17 affordable units will be delivered as part of this scheme with four units provided along Milton Avenue and 13 at Hillside. The units will comprise 2, 3 and 4-beds with a mix of flats and houses to ensure that the application delivers a mix of sizes to meet the community’s needs. The 17 units are put forward as rental properties as it is considered that 3 and 4-bed properties on a shared ownership basis may be not viable.

The remaining 28 affordable units will be provided at the Former Day Centre which will be NAIL. The units will be 1-bed as they are specifically required for this type of accommodation and will be ring-fenced to a specific client group by LBB’s Adult Social Care department once planning permission has been granted.

The Former Day Centre was deemed the most appropriate location to house the NAIL as the site was of a sufficient size that would enable the construction of a self-contained building. Consequently, the majority of the affordable housing is located on the Former Day Centre site.

The Hillside scheme will be the first of the housing plots to be constructed and will therefore bring forward 13 affordable units for occupation. Milton Avenue and the Former Day Centre will be constructed at the same time bringing the remaining 32 affordable units on-stream together.
4.41 The exact location of the affordable housing units will be set out in the subsequent reserved matters applications.

**EIA Screening**

4.42 As part of this application we would like to formally request a Screening Opinion pursuant to Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 in relation to this application and the outline application at the Former Day Centre, Twybridge Way as the sites are intrinsically linked (see Section 3 for further details) (hereafter referred to as ‘the proposed development’).

4.43 The proposed development falls within the ‘urban development projects’ category of Schedule 2 of the Regulations. Schedule 2 developments are deemed to require an Environmental Impact Assessment (EIA) only if the particular development is judged likely to give rise to significant environmental effects which may be by virtue of the sensitivity of the receiving environment. The applicable thresholds for this category of development are if the overall area of the development exceeds 5 ha; or the development includes more than 150 dwellings; or the development includes more than 1 hectare of urban development which is not dwellinghouse development.

4.44 The proposed development falls below these thresholds.

4.45 The indicative thresholds and criteria for urban development projects state "EIA is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination”.

4.46 The existing school building at Stonebridge Primary School is Grade II Listed and the existing canal feeder is designated as a SBINC (Grade II). The listed building will be preserved and the SBINC enhanced as part of the open space proposals. This application will involve some loss of trees although all important trees will be retained and there will be a net increase in trees across the site as result of the proposed scheme. The sites are not directly affected by any other planning designations. It is therefore considered that the proposed development (which comprises this application and the outline application at the Former Day Centre) is not likely to have a significant environmental effect on the receiving environment.
5 Statement of Stakeholder and Community Involvement

5.1 Initial design work on the proposed scheme started in 2013, and has progressed to the point that the scheme addresses all the issues raised by the various stakeholders. A summary of consultations undertaken during the design of the scheme is provided below.

London Borough of Brent – Planning

5.2 A pre-application meeting was held at LBB’s Civic Centre on 25th November 2015 and was attended by LUC, Southstudio Architects, LBB’s Capital Projects Manager Emma Sweeney, LBB’s Regeneration and Growth Manager Jill Rennie, LBB’s Deputy Area Planning Manager Ben Martin and LBB’s Principal Heritage Conservation Officer Mark Price.

5.3 The meeting included the following items:

- Explanation of the proposed scheme, including the redevelopment of the Former Day Centre, Twybridge Way.
- Strategy for the planning applications.
- Heritage at Stonebridge Primary School.
- Other planning-related considerations.
- EIA Screening.
- Consultation.
- Documents to accompany the planning applications.
- Programme for the planning applications.

5.4 In summary, the proposed scheme was received well, with no significant issues raised by Ben Martin or Mark Price.

London Borough of Brent – Transport

5.5 TPA sent a Transport Scoping Note to John Fletcher, Development Control Team Leader, on 15th June 2015 to agree the scope of works with regard to the proposed traffic/ parking survey programme. A response was received on 24th June 2015 and the advice can be summarised as follows:

- Kentachbull Road/ Hillside junction can be scoped out of the traffic count as the impact will not be significant enough to warrant consideration.
- Hillside/ Welsey Road, Hillside/ Shakespeare Avenue, and Hillside/ Twybridge Way should be considered as part of the traffic count.
- An Automatic Traffic Counter (ATC) on Hillside would be beneficial.
- With regard to the parking survey, overnight snapshot surveys should be carried out for the Twybridge Way site, rather than an 8am-9am parking beat survey. A 5-minute interval survey of Wesley Road would be useful at School opening and closing times, in addition to the 15-minute beat survey across the wider 200m area.

5.6 A further request for pre-application advice was submitted by TPA on 24th June 2015 requesting confirmation that the proposed dates for the survey work were acceptable. A response from John
Fletcher was received on 1st July 2015 confirming that the scope and timeframes for the survey work were acceptable.

5.7 A third request for pre-application advice was sent by TPA on 4th December 2015 which set out the amendments to the proposed scheme since the previous discussions. A response to the request was not received prior to the submission of this application.

**London Borough of Brent – BREEAM**

5.8 The client team has received pre-application advice on a number of school expansion projects with regard to BREEAM. Brent Core Strategy policy CP19 Brent Strategic Climate Change Mitigation and Adaptation Measures requires a BREEAM rating of ‘Excellent’ for all majors. However, in advice received from David Glover, Deputy Manager, on 11th June 2015 he noted “for Major school extension applications we ask applicants to endeavour to achieve ‘Excellent’ but have accepted ‘Very Good’ where this has not been feasible. The application submissions therefore [should] show how the score has been reasonably maximised whilst outlining why ‘Excellent’ is not feasible.”

5.9 It is considered that the advice above is applicable to this application and the BREEAM Pre-Assessment submitted with this application sets out that a BREEAM score of ‘Very Good’ can be achieved and a score of ‘Excellent’ is possible. It is not possible to say with any certainty that ‘Excellent’ will be achieved as further verification is required because: the level of detail required is not known at the time of submission for planning; the costs are unknown; and further survey work is required.

5.10 See the BREEAM Pre-Assessment for further details.

**London Borough of Brent- Heritage and Conservation**

5.11 A pre-application meeting was held on 13th July 2015 at LBB’s Civic Centre which was attended by Southstudio Architects, LBB’s Capital Projects Manager Emma Sweeney, LBB’s Regeneration and Growth Manager Jill Rennie, LBB’s Principal Heritage Conservation Officer Mark Price and LBB’s Planning Officer Andrew Bates.

5.12 The meeting focused on the heritage issues of the proposed scheme including the impact of housing on the School setting, works associated with the listed building including the first floor walkway and the impact of the proposed School building.

5.13 The key matters considered at the meeting can be summarised as follows:

- The Hillside scheme should step down in scale when adjacent to the School and the frontage along Hillside should step up – subject to further design.
- Some of the panels of the proposed first floor walkway should be coloured translucent polycarbonate instead of clear translucent polycarbonate.
- The balustrades on the mezzanines should be in glass, to reduce their impact.
- The planning application should include details of the link bridge connection to the existing listed building and details of the new lift and stair elements.
- The existing kitchen block will remain and it was suggested that it could be over clad to soften its appearance.
- No objection was raised to the proposed waste management location which is to the rear of the covered staff car parking area.
- The existing railings in the main playground which originally defined the school boundary are considered an obstacle, disrupting the movement of pupils and teachers. No objection was raised to its realignment in relation to the new proposals.
- It was agreed that a light grey zinc tile should be used to clad the proposed building instead of a dark zinc colour.
An additional meeting was held on 10\textsuperscript{th} December 2015 attended by LBB’s Capital Projects Manager Emma Sweeney and LBB’s Principal Heritage Conservation Officer Mark Price to discuss works to the existing gates and railings. In summary, it was agreed that:

- Both sets of gates and the pedestrian gate can be removed and replaced with appropriate electric gates.
- A higher fence can be erected behind the existing listed fence along the northern boundary of the School.
- The existing railings in the playground which defined the original school boundary can be removed in the line with the building to be finished with a column matching the others.

Details of the proposed scheme’s impact on heritage are set out in the Design and Access Statement: Stonebridge Primary School accompanying this planning application.

### Historic England

Pre-application advice was received from Kathy Clark, Assistant Inspector of Historic Buildings and Areas, on 20\textsuperscript{th} November 2015 which provided advice on the significance of the School buildings, planning policy, the proposed scheme and its impacts and Historic England’s position. The advice can be summarised as follows:

- "The proposed approach of appropriating a classroom on each floor to become a new stair core is a suitable one, subject to careful detailing and retention of historic structural and decorative fabric as far as possible”.
- The alterations to the upper hall are likely to be acceptable, subject to the alterations being reversible, remain at a low level, and the roof structure remains fully visible.
- The general massing and form of the proposed building would not cause undue harm to the significance of the listed building as it is considerably lower in height and separated from the main building. As such, it will be read as subservient to the listed building.
- The contemporary design of the proposed building is considered appropriate.
- The materials for the proposed building, including colour and texture, should “sit harmoniously alongside the listed building and the engineering workshop”.
- The proposed building will be linked to the listed building via first floor walkway. The eastern elevation of the listed building is well composed, formal and mostly symmetrical. The inclusion of the walkway will cut off views off the elevation, and project from the centre of the elevation. Historic England are not sure if this part of the scheme can be resolved without compromising the eastern elevation. Historic England therefore requested that the design team reconsider the requirement for a fully enclosed walkway, and that solutions such as an open-sided walkway at ground floor level should be explored as an alternative.
- Paragraphs 132 and 134 of the National Planning Policy Framework (NPPF) are of direct relevance to the proposed scheme. Historic England considers that the proposed walkway is likely to cause some harm to the listed building. If the proposals were to be submitted as they were at pre-application stage, Historic England would advise LBB that paragraph 134 should apply, and that the harm should be outweighed by the public benefits of the proposed scheme.

A copy of Historic England’s pre-application advice can be found at Appendix 3.

### Canal and River Trust

Pre-application advice was received from Claire McLean, Area Planner at Canal and River Trust on 10\textsuperscript{th} December 2015. The pre-application advice can be summarised as follows:

- The Canal and River Trust supports the principle of the proposed naturalisation works to the canal feeder, which will improve the amenity and biodiversity value of the open space.
• The proposed walkway along the canal feeder should be setback on the bank.
• It has been reported in the past that great crested newts are located within the canal feeder.
• A trash screen should be considered where the canal feeder enters the culvert at Milton Avenue, to prevent debris causing an obstruction, particularly in a flood event.
• Proposed vegetation around the waterway must be well managed, to prevent it overgrowing into the channel and causing blockages.

Sport England

5.19 A pre-application advice request was sent to Sport England on 5th November 2014 and a response was received from Katy Walker, Principal Planning Manager, on 6th November 2014. The response confirmed that “the site is not considered to form part of, or constitute a playing field as defined in the town and Country Planning (Development Management Procedure) (England) Order 2010 (Statutory Instrument 2010 No. 2184)… As the proposal does not have any impact on sport facilities or playing field, Sport England has no comments to make and would not require to be consulted [at the] formal planning application stage”.

Community Engagement

5.20 LBB organised six consultation events for the proposed scheme which also sought comments on the redevelopment of the Former Day Centre. The dates, venues and formats for the events are set out in Table 5.1.

Table 5.1: Pre-Application Consultation Events

<table>
<thead>
<tr>
<th>Date</th>
<th>Venue</th>
<th>Format</th>
</tr>
</thead>
<tbody>
<tr>
<td>14th October 2014</td>
<td>Stonebridge Primary School</td>
<td>Drop-in consultation event for parents, teachers and pupils</td>
</tr>
<tr>
<td>3:30-5:30pm</td>
<td></td>
<td></td>
</tr>
<tr>
<td>21st October 2014</td>
<td>Bridge Park</td>
<td>Brent Connects – presentation and question and answer session</td>
</tr>
<tr>
<td>7pm</td>
<td></td>
<td></td>
</tr>
<tr>
<td>29th October 2014</td>
<td>The Hub, Hillside</td>
<td>Drop-in consultation event</td>
</tr>
<tr>
<td>9:30-11:30am</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5th November 2014</td>
<td>The Hub, Hillside</td>
<td>Drop-in consultation event</td>
</tr>
<tr>
<td>5:30-7:30pm</td>
<td></td>
<td></td>
</tr>
<tr>
<td>12th November 2014</td>
<td>Stonebridge Primary School</td>
<td>Drop-in consultation event</td>
</tr>
<tr>
<td>5:00-7:00pm</td>
<td></td>
<td></td>
</tr>
<tr>
<td>23rd July 2015</td>
<td>Stonebridge Primary School</td>
<td>Workshop focusing primarily on the proposed open space</td>
</tr>
<tr>
<td>3:00-8:00pm</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Drop-in Consultation Events

5.21 The consultation aimed to gather the views of residents and interested parties on the proposed scheme. A consultation leaflet was prepared and delivered to: properties within 0.5 miles of the

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6 This advice solely relates to the development within the School grounds.
site, all pupils at Stonebridge Primary School, the Brent Play Association (who managed the Former Adventure Playground), the Former Welsh School, the Our Lady of Loudres Catholic Primary School, Fawood Children’s Centre, The Hub Hillside reception, Brent START Stonebridge, Hillside Primary Care Centre and St. Michael’s Nursery. In total, approximately 6,700 leaflets were distributed over the course of the consultation.

5.22 Consultation information was also provided to the local press and a website was created which had the consultation information and an online consultation response portal. The website link was provided to a number of organisations for further distribution.

5.23 Approximately 60 individuals attended the drop-in consultation events (excluding Brent Connects which was not exclusively for this consultation) and 90 written submissions (leaflets, online comments and 17 A4 signed standard documents) were received. LBB also received one response via the phone prior to the start of the consultation. Comments from the telephone call were added to the verbal comments from the consultation events.

5.24 LBB officers at the consultation events also took notes of conversations they had with members of the public.

5.25 A summary of the responses is provided below:

**School Expansion**
- The school expansion should be redesigned so not to be at the expense of the Adventure Playground or leave the school as existing, i.e. on two sites.
- The consolidation of Stonebridge Primary School onto one site was welcomed.
- Due to the School having the annexe site it was felt that the school expansion was only providing a further 30 places.

**Adventure Playground**
- Importance of the facility in terms of a safe and supervised environment for children to play.
- Importance of the facility in terms of childcare – including after school and summer school provision.
- Importance of the facility in terms of a place where children could go where anti-social behaviour/crime would not be tolerated.
- The benefits the facility provided with regard to indoor play space.
- The benefits the facility provided to low-income households as it was free.

**Open Space**
- Generally the new play spaces to be provided were unsupported as they were considered unsafe as they would be unsupervised and adjacent to roads. However, a number of responses recognised that the proposed scheme would improve the open space and canal feeder.
- A number of respondents did not want to see a loss of open space or trees as a result of the proposed scheme.

**Residential**
- A number of respondents did not want more housing, especially on Hillside and along Milton Avenue.
- Where responses were received in favour of the proposed residential element they wanted to see more housing within the area, not flats. The homes should also be affordable.
- There was a desire for the proposed residential elements to be to a high standard of design.

**Welsh School**
- Limited responses were received with regard to the Welsh School but where responses were received they questioned what the future of the Welsh School would be.
Other Issues

- The proposed scheme should ensure that community cohesion is maintained and enhanced.
- Traffic and parking issues were raised with regard to ensuring that there is enough parking provision for the existing uses and the proposed scheme.

Open Space Workshop

5.26 The workshop held on 23rd July 2015 sought to gather public views in relation to the proposed open space provision, including what should be provided. Similar to the drop-in consultation events, a leaflet was prepared and distributed to addresses within 0.5 miles of the site and a number of local organisations. An advert was uploaded on to LBB’s website and an additional advert ran for two weeks in The Brent and Kilburn. Emails were also sent to those individuals who had previously provided their email address.

5.27 12 people in total attended the workshop which is considered to be extremely low for such an event.

5.28 A summary of the comments is provided below:

- A mix of facilities should be provided which will encourage a range of people to use the open space.
- The safety of children should be a high priority.
- A supervised children’s play space should be provided.
- It is important to get play space into open space, with a need for more space for children.
- A similar facility to Chalkhill Gym was suggested as a facility that could be provided at the site.
- A Community Garden/Gardening Club would help bring the community together, particularly the young and elderly.
- A Community Café, similar to Roundwood Park would provide a place for people to meet, acting as a focal point within the site.
- Ecological information boards should be erected to enable users to further their understanding of the local environment.
- A number of responses highlighted the importance of creating a place where the community could come together and enhance community cohesion.
- The canal feeder should be maintained so it is safe for its proposed use.
- Issues were raised with regard to cleaning, vandalism and dogs.
6 Planning Policy Appraisal

Introduction

6.1 This section summarises the relevant planning policy context at national and local policy levels, and considers the Development Plan policies against which this planning application should be considered, as well as other material considerations.

6.2 The proposed redevelopment of Stonebridge Primary School and Hillside complies with national and local planning policy legislation.

6.3 The policy context is set out below under the following headings:

- Development Plan Policy.
- Material Planning Considerations.

Development Plan Policy

6.4 Section 38(6) of the Planning & Compulsory Purchase Act 2004 states that:

"if regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise".

6.5 The statutory Development Plan that covers the proposed scheme comprises the London Plan (2015, also known as the Further Alterations to the London Plan - FALP), the saved policies within the Unitary Development Plan (UDP) (2014) and the Core Strategy (2010).

6.6 LBB is also preparing a Development Management Policies Development Plan Document (DPD) (2015) and the Proposed Submission Document was consulted on between 24th September–5th November 2015. Approval will now be sought from Brent’s Full Council to submit the DPD to the Planning Inspectorate. It is anticipated that Examination will take place between winter 2015 and spring 2016. As the document is still to be submitted to the Planning Inspectorate, less weight should be given to the draft policies when compared to the extant planning policies of the London Plan, the UDP and the Core Strategy.

The London Plan

6.7 The FALP (hereafter referred to as the ‘London Plan’) was adopted in March 2015 and consolidates the London Plan, the Revised Early Minor Alterations (REMA) to the London Plan and the further alterations into one document. It sets out the spatial development strategy for Greater London, providing a framework for the development and use of land over the next 20-25 years. It provides a strategic, London-wide policy context within which boroughs should set their local planning policies.

6.8 A number of policies in the London Plan are of relevance to the proposed scheme, as outlined below:

- Policy 3.1 Ensuring Equal Life Chances for All seeks to protect and enhance facilities that meet the needs of particular groups and communities.
- Policy 3.2 Improving Health and Addressing Health Inequalities states new developments should be designed, constructed and managed in ways that improve health and promote healthy lifestyles and reduce health inequalities.
- Policy 3.4 Optimising Housing Potential states development should optimise housing output for different types of location within the relevant density range set out in Table 3.2 of the London Plan. Developments which compromise this policy should be resisted.

- Policy 3.5 Quality and Design of Housing Developments states the design of all new housing developments should enhance the quality of local places, taking into account physical context, local character, density, tenure, land use mix and their relationships with the locality.

- Policy 3.6 Children and Young People’s Play and Informal Recreation Facilities states housing development should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. The Mayor’s Supplementary Planning Guidance for Children and Young People’s Play and Informal Recreation (correct title is Shaping Neighbourhoods: Play and Informal Recreation (2012)) sets out guidance to assist.

- Policy 3.8 Housing Choice states boroughs should ensure that new developments offer a range of houses, in terms of the mix of housing sizes and types, taking into account the housing requirements of different groups, all new housing is built to ‘The Lifetimes Homes’ standard, 10% of new housing to be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users and offer houses to meet the needs of large families.

- Policy 3.12 Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes seeks the maximum reasonable amount of affordable housing within the aforementioned schemes. Negotiations on sites should take account of individual circumstances including development viability, availability of public subsidy and the implications of phased development.

- Policy 3.13 Affordable Housing Thresholds states boroughs should normally require affordable housing provision on development proposals which have 10 or more units, applying the density guidance set out in policy 3.4 and Table 3.2 of the London Plan.

- Policy 3.15 Co-ordination of Housing Development and Investment states boroughs should ensure that the London Plan’s long-term, strategic housing policies are informed by, and integrated with, the short to medium-term goals provided by their own programmes and other relevant agencies.

- Policy 3.16 Protection and Enhancement of Social Infrastructure supports development proposals which provide high quality social infrastructure in light of local and strategic needs assessments.

- Policy 3.18 Education Facilities supports development proposals which enhance education and skills provision, including the expansion of existing schools. Those which address the current and projected shortage of primary school places will be particularly supported.

- Policy 3.19 Sports Facilities supports development proposals which increase or enhance the provision of sport and recreation facilities. Proposals that result in the net loss of facilities should be resisted.

- Policy 5.2 Minimising Carbon Dioxide Emissions states development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:
  - Be lean – use less energy;
  - Be clean – supply energy efficiently; and
  - Be green – use renewable energy.

Non-residential developments should ensure they meet the target carbon dioxide emissions as set out in Building Regulations. Major developments should be supported by an energy assessment which demonstrates how the carbon dioxide emission targets will be met.

- Policy 5.3 Sustainable Design and Construction states developments should demonstrate that sustainable design standards are integral to the scheme, including its construction and operation. Major developments should meet the minimum standards outlined in the Mayor’s supplementary planning guidance.
• Policy 5.7 **Renewable Energy** states within the framework of the energy hierarchy (policy 5.2) major developments should provide a reduction in expected carbon dioxide emissions through the use of onsite renewable energy generation, where feasible.

• Policy 5.9 **Overheating and Cooling** states major developments should demonstrate how the design, materials, construction and operation of the scheme will minimise overheating and meet its cooling needs. New development should also be designed to avoid the need for energy intensive air conditioning systems as much as possible.

• Policy 5.10 **Urban Greening** seeks to integrate green infrastructure in schemes through tree planting, green roofs and walls and soft landscaping.

• Policy 5.11 **Green Roofs and Development Site Environs** states major developments should be designed to include roof, wall and site planting, especially green roofs and walls where feasible.

• Policy 5.13 **Sustainable Drainage** states developments should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield runoff rates and ensure that surface water runoff is managed as close to the source as possible.

• Policy 5.14 **Water Quality and Wastewater Infrastructure** states developments must ensure that adequate wastewater infrastructure is available for the development to be constructed.

• Policy 5.15 **Water Use and Supplies** states developments should minimise the use of mains water by incorporating water saving measures and equipment.

• Policy 6.3 **Assessing Effects of Development on Transport Capacity** states developments should ensure that impacts on transport capacity and the transport network are fully assessed and that developments should not adversely affect the safety of the network. Major developments should be supported by Transport Assessments.

• Policy 6.9 **Cycling** states developments should provide secure, integrated, convenient and accessible cycle parking facilities in line with the minimum standards set out in Table 6.3 in the Parking Addendum of the London Plan.

• Policy 6.10 **Walking** states developments should ensure high quality pedestrian environments.

• Policy 6.13 **Parking** states the maximum standards set out in Table 6.2 in the Parking Addendum of the London Plan should be the basis for considering planning applications.

• Policy 7.1 **Lifetime Neighbourhoods** states developments should be designed so that the layout, tenure and mix of uses interface with surrounding land and improve people’s access to social and community infrastructure, including green spaces and the blue ribbon network. Development should also enable people to live healthy active lifestyles, maximise community cohesion, contribute to people’s sense of place, safety and security and should be designed so that the spaces created reinforce and enhance the character, legibility and permeability of a neighbourhood.

• Policy 7.2 **An Inclusive Environment** states Design and Access Statements should explain how, following necessary consultation, the principles of inclusive design have been integrated into the proposed scheme.

• Policy 7.3 **Designing Out Crime** states developments should reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating.

• Policy 7.4 **Local Character** states developments should be of high quality design and have regard to the form, function and structure of the local area.

• Policy 7.5 **Public Realm** states development should make the public realm comprehensible at a human scale integrating gateways and focal points into the design. Landscape treatment, street furniture and infrastructure should be of the highest quality and the treatment of the public realm should be informed by the heritage value of the place.

• Policy 7.6 **Architecture** states developments should be of the highest architectural quality and make a positive contribution to the streetscape and the wider character of the local area.
• Policy 7.8 Heritage Assets and Archaeology states development should identify, value, conserve, restore, re-use and where appropriate incorporate heritage assets. Development affecting heritage assets including their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

• Policy 7.14 Improving Air Quality states developments should minimise increased exposure to existing poor air quality and address local problems of air quality, promote sustainable design and construction to reduce emissions from demolition and construction and be at least ‘air quality neutral’.

• Policy 7.15 Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Appropriate Soundscape states developments should seek to manage noise by avoiding significant adverse noise impacts on health and quality of life as a result of new development.

• Policy 7.19 Biodiversity and Access to Nature states developments, where possible, should make a positive contribution to the protection, enhancement, creation and management of biodiversity and should not adversely affect the integrity of European sites.

• Policy 7.21 Trees and Woodlands states existing trees of value should be retained and any loss as a result of developments should be replaced following the ‘right place, right tree’ principle. The planting of additional trees should also be included in new developments, where appropriate.

• Policy 7.27 Blue Ribbon Network: Supporting Infrastructure and Recreational Use states developments should enhance the use of the Blue Ribbon Network, improving access to and alongside the Blue Ribbon Network.

• Policy 7.30 London’s Canals and Other Rivers and Waterspaces states developments should respect the local character of other rivers and waterspaces and contribute to their accessibility and active water related uses.

Brent Unitary Development Plan

6.9 The Brent UDP provides planning guidance for the development and use of land in Brent, seeking to improve the environment, promote the regeneration of areas in need of renewal and promote access to new development for the whole community. Saved policies of the UDP of relevance to the scheme include:

• STR5 seeks a sustainable pattern of development which reduces the need to travel, especially by car.

• STR6 states on-street parking controls and off-street parking standards will be used to restrain traffic.

• STR13 seeks the development of environmentally sensitive forms of development which reduces the overall energy demand of the development and is positively integrated with ecological and natural processes.

• STR14 states developments will be expected to make a positive contribution to improving the quality of the urban environment in Brent.

• STR15 states development should enhance the public realm, by creating or contributing to attractive and successful outdoor areas.

• STR20 states where suitable and practical, development accommodating 15 or more units should include the maximum reasonable proportion of affordable housing consistent with the UDP’s affordable housing provision levels.

• STR36 states sites which have a nature conservation value will be protected and enhanced.

• BE1 Urban Design Statements states an Urban Design Statement should be submitted for developments where the site is 0.3ha or larger. The Statement should include matters relevant to the scheme such as important features, the location and nature of existing and
potential links, important views, the relationship of the site to the surrounding area and how the design relates to its urban context.7

- **BE2 Townscape: Local Context and Character** states proposals should be designed with regard to their local context, making a positive contribution to the character of the area.

- **BE3 Urban Structure: Space and Movement** states developments should have regard to the existing urban grain, development pattern and density in the layout of sites.

- **BE4 Access for Disabled People** states developments used for educational purposes should include suitable access and facilities for disabled people.

- **BE5 Urban Clarity and Safety** states developments should be designed to be understandable to users, free from physical hazards and reduce the opportunities for crime.

- **BE6 Public Realm: Landscape Design** states a high standard of landscape will be required as an integral element of a proposed development.

- **BE7 Public Realm: Streetscape** states a high quality of design and materials will be required for the street environment.

- **BE8 Lighting and Light Pollution** supports developments which are sensitively designed. However, developments should conserve energy through the use of low energy or renewable lighting systems where appropriate. Furthermore, the darkness of the night time sky should be preserved and harm to residential amenity and/or detriment to local distinctiveness should be avoided.

- **BE9 Architectural Quality** states new buildings should embody a creative and appropriate design solution, specific to the site’s shape, size, location and development opportunities.

- **BE12 Sustainable Design Principles** states developments should embody the sustainable design principles which are appropriate for the scale and type of development taking into account sustainable design, sustainable construction and pollution control.

- **BE17 Building Services Equipment** states all air-cooling, heating, ventilation, extraction and conditional systems and any ancillary plant and ducting should in the first instance be accommodated within the internal envelope of the proposed buildings. Where this is not possible they should be positioned so that they are in visually inconspicuous locations. If this is not possible they should considered as part of an overall integrated architectural design.

- **EP2 Noise and Vibration** states development will not be permitted if it generates or worsens noise levels above accepted levels. In particular, development will not be permitted where it would harm existing or proposed sensitive developments (e.g. housing).

- **EP3 Local Air Quality Management** states regard will be had to a development’s impact on air quality, especially affecting or in Air Quality Management Areas.

- **EP10 Protection of Surface Water** states development will be refused which harms watercourses.

- **H4 Off-site Affordable Housing – Provision in Lieu** states where affordable housing is appropriate it should be provided in situ other than in exceptional circumstances.

- **H12 Residential Quality – Layout Considerations** states the layout and urban design of residential development should comply with the policies in the Built Heritage chapter of the UDP.

- **H13 Residential Density** states the primary consideration in determining the appropriate density of new residential development will be achieving an appropriate urban design which makes efficient use of the land and meets the amenity needs of potential residents. The density of a development should have regard to the context and nature of the proposal and the constraints and opportunities of the site and type of accommodation proposed.

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7 It is considered that the submitted Design and Access Statements meet the requirement for an Urban Design Statement to be submitted as part of this application.
- **H14 Minimum Residential Density** states planning permission will be refused where development would under-utilise a site. Outline permissions will be the subject of a condition specifying a minimum number of dwellings at reserved matters stage.

- **TRN1 Transport Assessment** states developments which may have a significant impact on the transport network should be supported by a Transport Assessment. Applications will be assessed, as appropriate, for their impact on the environment, the road network and modes of public transport.

- **TNR3 Environmental Impact of Traffic** states where a development would cause or worsen an unacceptable environmental impact from traffic generation it will be refused.

- **TRN4 Measures to Make Transport Impact Acceptable** states where transport impacts are unacceptable, measures should be considered individually or in combination, which could mitigate the impacts and enable the development to go ahead.

- **TRN10 Walkable Environments** states new developments should have safe walking routes which are overlooked, convenient and attractive within the site and to surrounding facilities and areas.

- **TRN11 The London Cycle Network** states developments should comply with the UDP’s minimum cycle parking (PS16), with cycle parking situated in a convenient, secure and where appropriate, sheltered location.

- **TRN12 Road Safety and Traffic Management** states that when considering planning applications, priority will be given to road safety issues, particularly those affecting the convenience and safety of vulnerable road users such as pedestrians and cyclists.

- **TRN14 Highway Design** states new highway layouts, visibility splays and accesses to and within developments should be designed to a satisfactory standard in terms of safety, function, acceptable speeds, lighting and appearance.

- **TRN17 Restriction of New Roads** seeks to resist new roadspace unless it is necessary to provide access to, or circulation within a development.

- **TRN22 Parking Standards – Non-Residential Developments** states non-residential developments should make provision for vehicular parking in accordance with the maximum standards sets out in Appendix TRN2.

- **TRN23 Parking Standards – Residential Developments** states residential developments should not provide more parking than the levels as listed in standard PS14 for that type of housing, with its maximum assigned parking levels. On local access roads outside heavily parked streets parking may be provided onsite, for the frontage of the development only.

- **TRN34 Servicing in New Development** states the provision of servicing facilities is required in all development covered by the UDP’s standards in Appendix TRN2.

- **TRN35 Transport Access for Disabled People and Others with Mobility Difficulties** states access to parking areas within developments should facilitate access for disabled people and others with mobility difficulties. Designated car parking spaces should be set aside for the exclusive use of holders of disabled persons parking permits. The number and layout of spaces is to comply with the UDP’s standard (PS15).

- **OS13 Development on Site of Borough (Grade II) and Local Nature Conservation Importance** states development will not be permitted on site of Borough (Grade II) and Local Nature Conservation Importance unless it is demonstrated that there will be no adverse effects or compensatory provision for wildlife is made.

- **OS15 Species Protection** states developments which would have an adverse effect on protected species or national or local Biodiversity Action Plan species that are uncommon or under threat in London will be refused.

- **OS17 New Wildlife Habitats** seeks the creation of wildlife habitats as part of the landscaping schemes in major developments in the following locations: adjacent to areas of nature conservation importance and in areas of wildlife deficiency.
OS18 **Children’s Play Areas** seeks to provide suitable play areas for pre-school and junior children to National Playing Fields Association standards in residential developments over 15 units. Where such provision may not be appropriate, contributions to their provision in a more appropriate location will be acceptable.

CF6 **School Places** states contributions to build new school classrooms and associated facilities will be required where new housing development would worsen or create a shortage of school places.

CF8 **School Extensions** states developments which seek to expand schools to accommodate the forecast growth in pupil numbers will be supported. The proposals should have an acceptable transport impact and will be subject to the measures to reduce car use set out in TRN1.

**Brent’s Core Strategy**

6.10 Brent adopted its Core Strategy in July 2010 and sets out the spatial development plan for the Borough, the spatial vision of how Brent should be in 2026 and how the vision will be achieved. The planning policies set out in the Core Strategy which are of relevance to the proposed scheme are as follows:

- **CP2 Population and Housing Growth** seeks to provide at least 22,000 additional homes by 2026 and 50% of new homes should be affordable. 25% of new homes should also be family sized (three bedrooms or more).

- **CP18 Protection and Enhancement of Open Space, Sports and Biodiversity** states support will be given to the enhancement and management of open space for recreation, sporting and amenity use and the improvement of natural and built environment for biodiversity and nature conservation.

- **CP19 Brent Strategic Climate Change Mitigation and Adaptation Measures** states all developments should contribute towards achieving sustainable development, including climate change mitigation and adaptation. For major non-residential development a BREEAM rating of Excellent is expected. Major proposals should be accompanied by a Sustainability Statement demonstrating how the scheme will mitigate and adapt to climate change.

- **CP21 A Balanced Housing Stock** seeks to maintain and provide a balanced housing stock in Brent in support of Policy CP2, including the provision of an appropriate range and mix of self-contained accommodation types and sizes and care and support accommodation to enable people to live independently.

**Brent’s Development Management Policies DPD – Proposed Submission Document**

6.11 Brent consulted on the Development Management Policies DPD Proposed Submission Document in September-November 2015. The DPD will set out the detailed planning policies which are necessary for determining planning applications within the Borough. Once adopted, the remaining saved policies of the UDP will be superseded. Policies within the DPD which are of relevance to the proposed scheme are as follows:

- **DMP1 Development Management General Policy** states development will be acceptable provided it is in accordance with the criteria set out in the policy including location, design, access, impact on heritage assets, maintaining/ enhancing sites of ecological importance, reduces the potential for crime, minimise exposure to dust, noise and light pollution and general disturbance and retain existing blue and green infrastructure.

- **DMP7 Brent’s Heritage Assets** states development’s concerning heritage assets should sustain and enhance the significance of heritage asset and its setting. A detailed analysis and justification of the impact of the development on the heritage asset and its context as well as any public benefit should be provided.

- **DMP8 Open Space** states where open space is proposed it should be publicly accessible, designed to be safe, enhance biodiversity and include a suitable long-term management plan.
• DMP9 *Waterside Development* seeks to enhance the Blue Ribbon Network and proposals for development adjacent to river and canal edges are required to improve access to the waterways and provide an appropriate landscaped set-back.

• DMP12 *Parking* states development should provide parking consistent with parking standards in Appendix 1. Additional parking provision should not have a negative impact on existing parking, highways, other forms of movement or the environment.

• DMP13 *Movement of Goods and Materials* states the provision of servicing facilities is required in all development covered by the Plan's standards in Appendix 2.

• DMP15 *Affordable Housing* states the maximum reasonable amount of affordable housing will be sought on individual residential and mixed-use developments where 10 or more units are proposed. 70% of new affordable housing provision should be social/affordable and 30% intermediate. Where a reduction to affordable housing obligation is sought on economic viability grounds, developers should provide an appraisal to demonstrate that schemes are maximising their affordable housing output.

• DMP18 *Dwelling Size and Residential Outbuildings* states the size of dwellings should be consistent with London Plan Policy 3.5 Table 3.3 – Minimum Space Standards for New Development.

• DMP19 *Residential Amenity Space* states all new dwellings will be required to have external private amenity space of a sufficient size and type to satisfy its proposed residents’ needs. This is normally expected to be 20sqm per flat and 50sqm for family housing (including ground floor flats).

### Material Planning Considerations

6.12 In addition to the statutory Development Plan, there are a series of further planning documents that are material considerations.

**The National Planning Policy Framework**

6.13 The National Planning Policy Framework (NPPF) was published in March 2012 and constitutes guidance for local planning authorities as a material consideration in determining planning applications. It follows a principle based system and reinforces the government’s commitment to a plan-led system where local planning authorities should approve development proposals that accord with the Development Plan without delay.

6.14 The NPPF does not change the statutory status of the Development Plan as the starting point for decision making, stating that proposed schemes that accord with an up-to-date Local Plan should be approved. At the heart of the NPPF is a presumption in favour of sustainable development that should run through both plan-making and decision-taking. In assessing and determining development proposals, local planning authorities should apply the presumption in favour of sustainable development.

6.15 In terms of delivering sustainable development, the NPPF sets out a number of overarching policies which, taken as a whole, contribute to the achievement of sustainable development. Those of relevance to the proposed scheme include:

- Promoting sustainable transport.
- Requiring good design.
- Meeting the challenges of climate change.
- Conserving and enhancing the natural environment.
- Conserving and enhancing the historic environment.

6.16 With regards to good design, paragraph 58 states local planning authorities should "ensure that developments:
will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;

optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;

respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;

create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and

are visually attractive as a result of good architecture and appropriate landscaping”.

6.17 With regards to the preservation and enhancement of the historic environment, paragraph 31 of the NPPF states that local planning authorities, when determining planning applications, should take account of the following:

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 the conservation of heritage assets can make to sustainable communities including their economic vitality; and

The desirability of new development making a positive contribution to local character and distinctiveness.

6.18 Paragraph 134 of the NPPF states "where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be outweighed against the public benefits of the proposal, including securing its optimum viable use”.

6.19 With regards to the natural environment, paragraph 118 of the NPPF states “local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

...opportunities to incorporate biodiversity in and around developments should be encouraged;

Planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland, and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits, of the development in that location clearly outweigh the loss;...”.

6.20 With regard to the development of schools, the NPPF attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Specifically, paragraph 72 states that “local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

give great weight to the need to create, expand or alter schools and

work with schools promoters to identify and resolve key planning issues before applications are submitted”.

The London Plan Sustainable Design and Construction Supplementary Planning Guidance

6.21 The Sustainable Design and Construction Supplementary Planning Guidance (SPG) was adopted in April 2014 and provides supplementary information to support the implementation of London Plan policies, notably policy 5.3 Sustainable Design and Construction as well as a range of policies, primarily in Chapters 5 and 7 of the London Plan which relate to environmental sustainability. The SPG sets out the principles of sustainable design and construction and how they should be
implemented in London. This document is not policy; however it has considerable weight as a supplement to the London Plan and is therefore a material consideration.

6.22 To support the London Plan the SPG includes guidance on:

- energy efficient design;
- meeting the carbon dioxide reduction targets;
- decentralised energy;
- how to off-set carbon dioxide where the targets set out in the London Plan are not met;
- retro-fitting measures;
- support for monitoring energy use during occupation;
- an introduction to resilience and demand site response;
- air quality neutral;
- resilience to flooding;
- urban greening;
- pollution control;
- basements policy and developments; and
- local food growing.

**Shaping Neighbourhoods: Play and Informal Recreation – London Plan Supplementary Planning Guidance**

6.23 This guidance document supports the implementation of London Plan policy 3.6 – Children and Young People’s and Informal Recreation Facilities. The document provides guidance on what makes a good quality place for play including: space, location and accessibility, an environment that encourages healthy lifestyles, inclusion, diversity in lifetime neighbourhoods, playable space in a child-friendly city, access to nature, safety and security and management and maintenance.


6.24 Brent’s Design Guide for New Development was published in 2001 and aims to encourage high quality design in new developments whilst protecting the character and amenities of existing areas that are worth preserving. The sections of relevance to the proposed scheme include: 2.0 Designing Streets and Neighbourhoods, 3.0 Design Layout; 4.0 Design Appearance and 5.0 Outside Space.

**Compliance with Policy**

6.25 There is a clear rationale underpinning the proposed scheme. LBB currently has a shortage of primary school places and has identified that the expansion of Stonebridge Primary School is required in order to provide sufficient school places to enable the Council to meet its statutory duty.

6.26 The proposed expansion of Stonebridge Primary School will contribute to meeting this shortfall within Brent by providing one permanent additional form of entry, increasing the School’s roll to 630 pupils.

6.27 The proposed scheme will also enable the School to accommodate the pupils currently being taught at the temporary Stonebridge Primary School Annexe, located at the Former Day Centre, Twybridge Way.

6.28 The proposed scheme will therefore have a significant beneficial effect on education provision within Brent.

6.29 With regard to housing, the proposed scheme must be considered together with the redevelopment of the Former Day Centre as they are intrinsically linked – the Former Day Centre
can only be redeveloped once Stonebridge Primary School has been expanded enabling the School to accommodate the pupils at the Stonebridge Primary School Annexe, which currently occupies the Former Day Centre. The Stonebridge Primary School cannot be expanded (and the high quality open space and new access cannot be provided) without the redevelopment of the Former Day Centre, in addition to the residential development of Hillside and Milton Avenue, as the capital receipts from these components will cover a part of the School, open spaces and access costs.

6.30 The proposed scheme will provide 73 of the 128 residential units proposed across both sites comprising 1, 2 and 3-bed flats and 4-bed houses. 45 affordable units will be provided across both sites (17 as part of this application) which equates to 35% affordable housing provision – below the 50% required by policy CP2. The reasons for this are two-fold:

- 28 of the affordable units will be NAIL housing which requires a large amount of communal space for this specific supported housing. As such, if the NAIL housing was replaced by standard affordable units, approximately 7 more units would be available for development at the Former Day Centre.

- A development appraisal has been completed using ProVal software to demonstrate that the proposed level of affordable housing is the maximum reasonable level that can be viably delivered by the scheme given the requirement to fund the expansion of Stonebridge Primary School, the proposed highways works and provision of a high quality public open space. The results of the ProVal appraisal have been submitted to Brent Council as a confidential annex for reasons of commercial sensitivity.

6.31 Furthermore it was noted in the Report which was presented to Brent’s Cabinet on 23rd February 2015 to approve the principles of the proposed scheme that “the scale and mix of this development is likely to be predominantly private and intermediate products in recognition of the overwhelming concentration of affordable social housing in the vicinity”.

6.32 As such, it is considered that the proposed scheme is considered acceptable with regard to housing provision.

6.33 An assessment of the proposed scheme’s impact on heritage assets, namely the Grade II listed Stonebridge Primary School building is set out in the Design and Access Statement: Stonebridge Primary School. In summary, the proposed scheme includes a number of internal alterations, including the construction of a new stair and lift core, the installation of new WC’s and three new classrooms at first floor. The amendments are required to ensure that the School is DDA compliant and is fit for 21st century primary school education. It is considered that the installation of the fittings will have a negligible impact on the historic fabric of the building and with regard to the new classrooms, all of the interventions are reversible.

6.34 A number of external alterations are proposed to the listed building, most notably the construction of a first floor walkway to the proposed building located to the east of the listed building. The construction of the walkway will require minimal intervention and the bridge will not cause any additional loading onto the existing foundations as it will be supported by a pair of freestanding columns, supported on independent foundations.

6.35 With regard to the proposed building, it has been set back from the listed building to enable the listed building to continue to be read as an individual building from key views surrounding the School. The proposed building is also smaller in scale to ensure that when it is viewed along the listed building it appears subservient.

6.36 A section of original railings, gate, plinth and brick piers approximately 8.7m long will be removed from within the playground to facilitate emergency and maintenance access. The materials will be carefully removed, salvaged and stored for reinstatement of missing sections around the School as necessary. The termination of the new railing will be constructed with a matching brick pier and ornamental stone capping, using salvaged material or new materials.

6.37 A covered outbuilding in the location of the proposed building comprises a redundant and underused space. The building will be demolished as part of the proposed scheme and 3 original iron cast columns will removed carefully and salvaged for reuse. A 2.5m high fence will also be constructed around the School and in some places this will be immediately behind the existing listed railing.
6.38 The proposed external works will have an impact on the listed building, most notably the proposed building and first floor walkway, although this is judged to be less than substantial harm to the significance of the designated heritage asset, as defined in the NPPF. Also, and as set out above, the proposed scheme will have a significant beneficial effect on education provision within Brent. Therefore, paragraph 134 of the NPPF is applicable to the proposed scheme and it is considered that the harm of the proposed scheme on the listed building does not outweigh the proposed educational benefits.

6.39 LBB’s Principal Heritage Conservation Officer Mark Price was consulted throughout the iterative design process of the proposed scheme and raised no significant issues with regard to the proposals – see Section 3 of this Statement.

6.40 A Transport Assessment has been carried out to determine the likely impact of the proposed scheme on the public highway network, including the impact of the realigned Shakespeare Avenue. Four junctions were assessed including Hillside and Wesley Road, Hillside and Twybridge Way, Hillside and Shakespeare Road and Hillside and Shakespeare Avenue. The assessment demonstrates that once the proposed scheme is operational all four junctions will continue to operate within their designed capacities with a maximum ratio of flow to capacity of 75.9%. As such, there will be no impact on safety or the free flow of traffic.

6.41 16 car parking spaces will be provided within the School boundary, including one disabled space. The cycle and scooter spaces will be increased to 70 and 54 respectively. With regard to Hillside, 30 car parking spaces and 90 cycle spaces will be provided within a basement accessible from the realigned Shakespeare Avenue. A further five Sheffield stands providing ten cycle spaces will be provided in the public realm to serve the proposed retail unit. No marked spaces will be provided for the housing along Milton Avenue as it will be served by on-street parking in a similar fashion to the existing parking arrangements along Milton Avenue.

6.42 An assessment of the proposed servicing and refuse collection and emergency access to the School, Hillside and Milton Avenue has been undertaken and a summary is provided below.

6.43 Servicing and refuse vehicles will enter and exit the School in forward gear and will not restrict the stop line visibility at the junction of Wesley Road and Shakespeare Avenue when in place. Emergency access will be undertaken via the main access gate to the School playground. The vehicle will enter in forward gear and will perform a turning manoeuvre within the playground so that it can depart in forward gear.

6.44 Servicing and refuse collection for Hillside will be undertaken from a marked loading bay on the eastern side of the realigned Shakespeare Avenue. The bay allows for a 10m rigid vehicle (proxy for a delivery vehicle) and an 8.42m refuse vehicle (considered to be the most comparable to the refuse vehicle outlined within LBB’s Waste and Recycling Storage and Collection Guidance for Residential Properties). Emergency vehicle access will be taken from Hillside or Shakespeare Avenue.

6.45 Servicing, refuse collection and emergency access along Milton Avenue will continue as existing.

6.46 It is therefore considered that the proposed scheme will not result in any unacceptable impacts on the public highway network.

6.47 With regard to design, the proposed scheme has been designed based on an understanding of the site and its surroundings. The Design and Access Statements which accompany this application describe the design process that was followed. The proposed scheme is of a high quality that is compatible with the surrounding land, buildings and topography, as such, it is considered that the proposed scheme is considered acceptable with regard to design.

6.48 The proposed scheme will provide a new high quality 1.2ha public open space which will significantly improve the public open space provision within the area as it will bring areas of fenced wasteland back into public use. The open space will also provide a number of play areas, outdoor gym, community garden and the naturalisation of the canal feeder which will mitigate the loss of the Former Adventure Playground which closed in March 2015. The Landscape Concept Report submitted with this Application sets out in detail the various components which will be provided as part of the public open space and how the space will be fully integrated into the surrounding locality. It is therefore considered that the proposed scheme is acceptable with regard to open space.
6.49 To conclude, it is considered that the proposed redevelopment of Stonebridge Primary School and Hillside complies with national and local planning policy legislation.
Appendix 1 - Determination of the Proposal to permanently Expand Stonebridge Primary School Report
Cabinet
1 June 2015

Report from the Strategic Director
Children and Young People and the
Strategic Director Regeneration and Growth

Wards Affected: ALL

Determination of the proposal to permanently expand
Stonebridge Primary School

1. Summary

1.1. In line with the School Place Planning Strategy approved by Cabinet in October 2014, the proposal to permanently expand Stonebridge Primary School by one form of entry (1FE) has been put forward by the governing body in partnership with Brent Council.

1.2. This report informs the Cabinet of the outcome of the statutory consultations on the proposals to alter Stonebridge Primary School through permanent expansion from September 2015 and recommends that the statutory proposals to expand the school be approved.

1.3. The representation period on the proposals ended on 2 April 2015. This report also informs the Cabinet of the responses to the consultation.

2. Recommendations

2.1. The Cabinet is recommended to:

2.2. Approve the permanent expansion of Stonebridge Primary School, a community school, by one form of entry from September 2015, (conditional upon the grant of full planning permission under the Town and Country Planning Act 1990 by September 2015 or at such date as agreed by the Strategic Director of Children and Young People and the Strategic Director of Regeneration and Growth).

2.3. Note that the reason for approving the alterations is to provide sufficient permanent primary school places in line with the council’s statutory duties and its School Place Planning Strategy 2014.
3. **Background**

3.1.1. In October 2014, the Cabinet approved a new School Place Planning Strategy. This established the need for a continuing programme of provision of additional school places and, for the first time, a set of principles which the council would use to determine its future decision making on school place planning. These were established in the context of the overall objective of securing sufficient high quality school places for all Brent’s children in line with the council’s statutory responsibilities. The strategy also established that the council would aim to meet the Department for Education guideline of having a five per cent vacancy rate to allow for mobility and fluctuations as well as to support parental preference. Currently the vacancy rate in Brent primary schools is 2.1 per cent.

3.1.2. The Strategy identified a total primary requirement for the opening of 23 additional forms of entry by 2018. Members will recall that the strategy set out the list of planned permanent new places in Brent which included Stonebridge Primary School:

<table>
<thead>
<tr>
<th>School</th>
<th>No. of places</th>
<th>No. of additional FE</th>
<th>Will be total FE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wembley High Technology College</td>
<td>840</td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td>Uxendon Manor Primary</td>
<td>420</td>
<td>2</td>
<td>4</td>
</tr>
<tr>
<td>Elsley Primary</td>
<td>420</td>
<td>2</td>
<td>4</td>
</tr>
<tr>
<td>Stonebridge Primary</td>
<td>210</td>
<td>1</td>
<td>3</td>
</tr>
<tr>
<td>Islamia Primary</td>
<td>210</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Malorees Infants and Juniors</td>
<td>210</td>
<td>1</td>
<td>3</td>
</tr>
<tr>
<td>Byron Court Primary*</td>
<td>420</td>
<td>2</td>
<td>5</td>
</tr>
<tr>
<td>Leopold (Gwenneth Rickus)</td>
<td>420</td>
<td>2</td>
<td>4</td>
</tr>
<tr>
<td>Kilburn Grange (Free School)</td>
<td>420</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Oakington Manor Primary*</td>
<td>210</td>
<td>1</td>
<td>4</td>
</tr>
</tbody>
</table>

**Total number of places** 3,780

*Now scheduled for September 2016

<table>
<thead>
<tr>
<th>School</th>
<th>No. of Places</th>
<th>No. of additional FE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oriental City site</td>
<td>420</td>
<td>2</td>
</tr>
<tr>
<td>Quintain site</td>
<td>630</td>
<td>3</td>
</tr>
<tr>
<td>Carlton Vale Infants and Kilburn Park (South Kilburn regeneration)</td>
<td>210</td>
<td>1</td>
</tr>
</tbody>
</table>

**Total number of places** 1,260
Table 3: Planned permanent new places for September 2017

<table>
<thead>
<tr>
<th></th>
<th>No. of Places</th>
<th>No. of FE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stanley Avenue Alperton site</td>
<td>630</td>
<td>3</td>
</tr>
</tbody>
</table>

3.1.3. This shows a programme of expansion right across the borough. Stonebridge Primary School is situated in Planning Area 4 where, even with the new places as planned, there is a potential shortfall in this Planning Area (Stonebridge/Harlesden) in almost every school year.

3.1.4. To meet additional demand, from Autumn 2012 Stonebridge Primary School commenced accepting pupils in a temporary Annexe building. Its Annexe facility has 180 places. There are currently 748 children in Brent being educated temporarily in offsite annexes and while plans are underway to bring 562 of them into permanent arrangements for September 2015 (including the Stonebridge Annexe pupils becoming part of a permanently expanded Stonebridge Primary) this situation is not tenable even in the medium term. It is vital that sufficient permanent places are provided both to address the current situation as described and to avoid the need for temporary places to be provided to meet projected demand if sufficient permanent provision cannot be secured.

3.1.5. Brent primary schools continue to be popular with parents of the increasing child population. The number of on-time applications for Reception places received for September 2015 totals 3,925. It is anticipated that there will be approximately 800 late Reception applications received between the closing date in January 2015 and the end of the academic year in July 2015. The number of late Reception applications has been increasing in recent years, primarily because of high population mobility.

The proposal in relation to educational standards (Principle 1)

3.1.6. Stonebridge Primary School was judged Good by the Office for Standards in Education (Ofsted) at the inspection in March 2013. Pupils of Stonebridge Primary are attaining higher results year on year. The percentage of Key Stage One pupils attaining Level 2 and above in reading, writing and national curriculum tests has increased by at least 2 per cent between 2013 and 2014, and in mathematics assessments have seen improvements of 15 percent in the same period.

3.1.7. The school utilises effective methods for closing the gap between disadvantaged and other pupils. In 2014, 100 per cent of disadvantaged pupils achieved expected progress.

3.1.8. The Brent Schools Partnership has recognised Stonebridge Primary as Specialist Centre for Safeguarding. Becoming a specialist centre gives Stonebridge a leading role in working with a number of agencies to share good practice and ensure a safe learning environment for all children. This includes offering child protection training for others.

3.1.9. In order to become a Specialist Centre Stonebridge Primary School provided evidence of its successful safeguarding practices and demonstrated its track record for supporting other schools.
3.1.10. **Proposals to alter Stonebridge Primary School**

3.1.11. The proposals comply with the Government’s guidance on school expansions and their current agenda for raising standards, innovation and transforming education. The internal accommodation and external play areas in the proposed expansion meet the area and design guidance standards detailed in Building Bulletin 103.

3.1.12. The expansion of the school is fully in line with the aim of the guidance and the wish of the Secretary of State that local authorities provide school places where demand is high. Stonebridge School serves a range of ethnic minority children, both boys and girls, and the proposals will be of benefit to them.

3.1.13. The expansion will increase the choice available to local parents and residents in an area of demand. The proposal will increase diversity of provision and enable the local authority to meet its statutory duty to provide school places to all resident pupils. The additional places will help meet for current and future need.

3.1.14. Additional classrooms and facilities will be provided to support the educational standards for all pupils and staff. The expansion will provide:

- a safe and secure environment
- a healthy environment with properly ventilated, appropriately sized classrooms with easy access to outside space (where required).
- spaces to maximise natural day lighting and control sunlight, to maximise thermal comfort, control glare and provide a suitable internal environment.
- environmentally friendly and efficient spaces
- minimal loss of ‘down-time’ i.e. travel to core facilities, toilets, etc. within at least the expanded building.
- a variety of learning experiences - individual, group, class, year group, quiet spaces internal and external in line with the requirements of the EFA baseline designs.
- maximised use of existing outdoor playing space and enhancement where possible and required.
- classrooms to support easy access to ICT provision.

3.1.15. In line with the criteria for school expansion approved by Cabinet in January 2015, a strategic view of anticipated costs of significant items of building condition work is sought. As a result the proposed works will include some work to the existing buildings in order to both avoid future cost in significant maintenance in the near future and to achieve an optimal layout from a school management perspective.

3.1.16. Subject to planning application approval and detailed programme review, it is anticipated that, the building works will commence at the beginning of 2016 and last for approximately one year.

3.1.17. No change to the existing SEN provision is being proposed. The proposal will comply with the standards, quality and range of educational provision for children with special educational needs in the proposed expansion of primary provision. The proposal will fully meet the requirements of the SEN Code of Practice and the accessibility standards.
3.1.18. **Capacity**

3.1.19. The current capacity of Stonebridge Primary School is 420. The school’s admission number is 60 pupils per year (two forms of entry).

3.1.20. As stated above, the school also has 180 places offsite at the Stonebridge Annexe (see paragraph 3.1.4 for details). These children would move onsite from September 2015, depending on the phasing of building works on the main site.

3.1.21. Therefore the current total number of places at both sites is 600. The expansion plans to increase the school’s capacity to 630 places and its admission number to 90 (three forms of entry). In real terms this means an increase of 30 pupils.

3.1.22. The non statutory informal consultation process commenced on 6 October 2014 and the architects began developing the previously completed feasibility study into a fully designed scheme (alongside the consultation) in December 2014. If expansion is approved new permanent Reception places will be accommodated at the school from September 2015.

3.1.23. It is anticipated that there will be a new build accommodation block with at least a 60 year design life. The designs are currently being developed to ensure that the school would be built in the most efficient way, with sustainable standards targeting a BREEAM rating of Excellent.

3.1.24. The council will complete the permanent building works in the 2016/2017 academic year. Should planning approval be granted and approval to expand the school be granted based on this report, then the school will take the first additional permanent Reception classes from September 2015 in existing accommodation. The construction work will be phased to account for the school being occupied during construction and will take place in the most part during the 2015/16 academic year (dates to be confirmed based on approvals).

3.1.25. The additional classrooms for September 2015 will be provided in existing accommodation.

3.2. **Background details of Stonebridge Primary School**

3.2.1. Stonebridge Primary School is located at Shakespeare Avenue, Stonebridge, NW10 8NG. It is a Community School (i.e. maintained and run by the local authority). It offers co-educational places for pupils aged 4-11 years.

3.2.2. Stonebridge Primary School building was first opened as a school in 1899. It has been maintained and modernised as far as possible and continues to accommodate many functioning teaching spaces. The main aspect of the school that continues to restrict its use is the circulation and access.
arrangements to all floors, something that will be addressed as part of this project.

3.2.3. Stonebridge Primary School was classified as Good by Ofsted in their inspection in March 2013. This contributes to the popularity of the school – see paragraph 3.1.7.

3.2.4. Stonebridge Primary School is very popular and there are few vacancies in the school overall.

3.3 Statutory Consultation Process – Four Stages

3.3.1 Since January 2014 the statutory school expansion process has four stages instead of five - Stage 1 Publication, Stage 2 Representation (formal consultation), Stage 3 Decision, Stage 4 Implementation. The informal consultation carried out by Brent Council prior to Publication is not legally required but is good practice as advised by the Department for Education.

3.3.2 The Governing Body of Stonebridge Primary School in partnership with the local authority carried out an informal consultation with key interested parties on the proposals of Stonebridge Redevelopment which included details of the School Expansion. The consultation document is attached as Appendix 2. Over 6,700 copies of the consultation document were distributed through hand delivery, email and/or internal/external post:

- the document was available at the consultation meetings
- the document was placed on the school website and the Brent consultation website
- approximately 400 copies were emailed out, including to all Councillors in Brent, all Brent schools, neighbouring boroughs and other statutory consultees.

3.3.3 The informal consultation began on 6 October 2014 and ended on 17 November 2014. All applicable statutory requirements to consult in relation to these proposals have been complied with.

3.3.4 Five consultation events with the community were held at various dates and locations (the responses to these events can be found in Appendix 3)

<table>
<thead>
<tr>
<th>Date</th>
<th>Venue</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>14/10/2014</td>
<td>Stonebridge Primary School</td>
<td>Drop in consultation event for parents, teachers and pupils</td>
</tr>
<tr>
<td>21/10/2014</td>
<td>Bridge Park</td>
<td>Brent Connects – Presentation and Question and Answer Session</td>
</tr>
<tr>
<td>29/10/2014</td>
<td>The Hub, Hillside</td>
<td>Drop in consultation event</td>
</tr>
<tr>
<td>05/11/2014</td>
<td>The Hub, Hillside</td>
<td>Drop in consultation event</td>
</tr>
<tr>
<td>12/11/2014</td>
<td>Stonebridge Primary School</td>
<td>Drop in consultation event</td>
</tr>
</tbody>
</table>
3.3.5 The consultation posed two open questions:

1. Please tell us what you like about the proposals and why?
2. Please tell us what you would like changed and why?

3.3.6 The Stonebridge Primary proposal received 90 responses in total this first informal consultation. Included in the total were 17 identical letters against the proposal referred to in this report as a group letter (see Appendix 4). Some people may have submitted a written response as well as the group letter therefore submitting two responses each. In this report we have treated them as separate submissions and counted every response in the total.

3.3.7 In addition a petition was submitted with over 1000 signatures protesting against the closure of the Adventure Playground. This was dealt with separately and does not form part of the consultation responses.

3.3.8 This consultation was linked to a wider consultation on regenerating the Stonebridge area. As a result a number of responses did not refer to the school expansion, or referred to the school expansion in conjunction with another aspect of the regeneration- particularly the Adventure Playground. Out of the 90 responses there were 47 responses that referred to the Stonebridge Primary School expansion.

3.3.9 Breakdown of responses from the informal consultation

Table 6: Breakdown of responses received for Stonebridge Primary (informal)

<table>
<thead>
<tr>
<th></th>
<th>Number of responses received</th>
<th>Percentage of response overall</th>
</tr>
</thead>
<tbody>
<tr>
<td>Group Letter</td>
<td>17</td>
<td>36%</td>
</tr>
<tr>
<td>Agree with expansion</td>
<td>11</td>
<td>23%</td>
</tr>
<tr>
<td>Disagree with expansion</td>
<td>18</td>
<td>38%</td>
</tr>
<tr>
<td>No decision reached</td>
<td>1</td>
<td>2%</td>
</tr>
<tr>
<td><strong>Total responses</strong></td>
<td><strong>47</strong></td>
<td><strong>100%</strong></td>
</tr>
</tbody>
</table>

3.3.10 The 47 responses on the school expansion were assessed in terms of 18 reoccurring themes:

**Themes**

**Educational**

1. School improvements
2. Unification of the school
3. Impact on the Welsh School
4. Disruption of construction on children’s education

**Necessity**

5. The need for school spaces
6. The scale of the school expansion- mostly arguing expansion is too small
7. Need to build on this site - arguments the annexe should remain, other schools could be built or the annexe could be developed

Health and Safety
8. Potential car accidents

Environmental
9. Traffic, congestion and pollution
10. Environmental impact - especially on mature trees

Community
11. Parking
12. Impact on the greater community - including an increase of crime
13. Impact on the adventure playground
14. Disruption of construction on residents
15. Housing and overcrowding
16. Regeneration in the Stonebridge Area
17. Conservation of the school building as a listed building

Transparency
18. Unfair process - particularly the pupils numbers appear misleading, lack of consultation on the Welsh School

3.3.11 Frequency of each theme:

3.3.12 The 18 themes were mentioned a total of 252 times in the 47 responses. The tables below highlight the frequency of responses to each theme. The most popular theme was theme number 13 - the impact on the Adventure Playground, with 35 responses out of 252, followed by housing and overcrowding (theme 15). Themes 4, 8 and 14 were equally unpopular with only 1 response each out of a possible 252.

3.3.13 As the group letter against the expansion accounts for 36% of all responses any topic that was listed on this letter has a very large number of responses compared with topics that are not listed on the petition.

3.3.14 The 18 themes were later grouped into 6 headings to provide a summarised version of the results. A table containing the frequencies and percentages of all themes can be found in Appendix 5.

Table 7: Frequency of themes - Stonebridge

<table>
<thead>
<tr>
<th>Theme groups</th>
<th>Frequency of themes</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Education (1-4)</td>
<td>26</td>
<td>10.3%</td>
</tr>
<tr>
<td>Necessity (5-7)</td>
<td>40</td>
<td>15.9%</td>
</tr>
<tr>
<td>Health and Safety (8)</td>
<td>1</td>
<td>0.4%</td>
</tr>
<tr>
<td>Environmental (9-10)</td>
<td>43</td>
<td>17.1%</td>
</tr>
<tr>
<td>Community (11-17)</td>
<td>139</td>
<td>55.2%</td>
</tr>
<tr>
<td>Transparency (18)</td>
<td>3</td>
<td>1.2%</td>
</tr>
<tr>
<td>TOTAL:</td>
<td>252</td>
<td>100%</td>
</tr>
</tbody>
</table>
3.3.15 The overall tone of the points made in the responses

3.3.16 These themes generated a mixture of responses which were graded as positive (for the expansion), concerned and negative (against the expansion).

<table>
<thead>
<tr>
<th></th>
<th>Education (1-4)</th>
<th>Necessity (5-7)</th>
<th>Health &amp; Safety (8)</th>
<th>Environmental (9-10)</th>
<th>Community (11-17)</th>
<th>Transparency (18)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Positive responses</td>
<td>5 19%</td>
<td>8 20%</td>
<td>0 0%</td>
<td>2 5%</td>
<td>6 4%</td>
<td>0 0%</td>
</tr>
<tr>
<td>Concerns</td>
<td>3 12%</td>
<td>1 3%</td>
<td>0 0%</td>
<td>17 40%</td>
<td>23 17%</td>
<td>0 0%</td>
</tr>
<tr>
<td>Negative responses</td>
<td>18 69%</td>
<td>31 78%</td>
<td>1 100%</td>
<td>24 56%</td>
<td>110 79%</td>
<td>3 100%</td>
</tr>
<tr>
<td>Total Responses per theme group</td>
<td>26 40%</td>
<td>1 43%</td>
<td>139 3%</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Negative responses to expansion are highest in every theme, accounting for 74 per cent of all responses.

3.3.17 The area with the greatest number of negative comments was theme 13- the impact on the adventure playground. This has been the subject of separate decision making by Cabinet and the Stonebridge Adventure Playground has now been vacated by the Brent Play Association.

3.3.18 The need for school places (theme 5) generated the most positive responses. The table above highlights the tone of responses to each theme group.

3.3.19 The written analysis is also considered in two parts, those identified as from within Brent and those who are not. This is in order to understand if there is a different response to those who are “local” and those who are not.

3.3.20 Response from the informal consultation from within Brent

3.3.21 Over a third of respondents discussed the school expansion proposals. The response to whether to expand the Stonebridge Primary School was mixed.

3.3.22 There were a number that did not want the proposed expansion due to the impact on the Adventure Playground, and would want the school expansion re-planned or relocated, including the school remaining on two sites.

3.3.23 Some respondents did not view that there was a need for the school expansion or that the proposed expansion was not producing any significant increase in spaces. This was due to the school having the annexe site and it being felt that the expansion was only producing a further 30 spaces.

3.3.24 Some respondents were against the expansion as they viewed Stonebridge as too crowded, whilst there were respondents who were in favour of the proposals.
3.3.25 Responses from the informal consultation that did not identify Brent

3.3.26 Just over a quarter of respondents discussed the school proposals. The majority of responses that discussed the school expansion or the need for additional school places were positive.

3.3.27 All tables containing all of the consultation responses related to the school expansion can be found in Appendix 6.

**Formal consultation**

3.3.28 Following careful consideration of the responses in the consultation stages outlined above, the governing body of Stonebridge Primary School in partnership with the local authority published the Statutory Notice in the Brent and Kilburn Times on 5 March 2015 for altering the school by 1FE from September 2015. Notices were also displayed on the school gates, on the school website, on the Brent Council consultation website and on the Brent and Kilburn Times electronic edition.

3.3.29 On 23 February 2015 a decision was made by Cabinet not to renew the contract for Brent Play Association to run the Adventure Playground and for BPA’s occupation of the site to be terminated. Individuals who had responded to the informal consultation by email were informed of this decision when the statutory notice was published.

3.3.30 The statutory notice is attached as Appendix 7.

**Stage Two – Representation (formal consultation)**

3.3.31 The statutory notices (issued on 5 March 2015) were followed by a four week statutory period (Representation stage), which ended on 2 April 2015, during which representations (i.e. objections or comments) could be made. The representation period is the final opportunity for residents and organisations to express their views about the proposal (in this consultation) and ensures that they will be taken into account by the Cabinet when the proposal is determined.

3.3.32 In total 1 representation was received during statutory period. The objection is listed below.

“I strongly oppose this expansion on the grounds that it will demolish the Stonebridge adventure Playground which has been there for 40 years. Any proposals should take this into consideration and make sure the expansion does NOT affect the adventure Playground which is needed and loved by the entire community. If this goes ahead it will not be with the agreement of the Stonebridge community”

**Conclusion**

3.3.33 The majority of negative responses (informal and formal) related to the future of the Stonebridge Adventure Playground, a matter already determined by the Cabinet earlier in the year. Environmental and safety concerns will be addressed through the planning process, while the necessity for the places and the education value of the expansion is clearly demonstrated.

3.3.34 The council is estimating that the planning permission would be granted under Part 3 of the Town and Country Planning Act 1990 from July 2015. Hence, the Cabinet is requested to approve the expansion of Stonebridge Primary
School from September 2015, conditional upon the granting of planning permission and in accordance with Schedule 3 paragraph 3 of the School Organisation Regulations 2013.

3.4 **Next Steps**

3.4.31 The anticipated dates for the key project milestones following a decision by the Cabinet to determine this proposal to alter Stonebridge Primary School are set out in the timetable below:

<table>
<thead>
<tr>
<th>Table 9: Project milestones</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Milestone</strong></td>
</tr>
<tr>
<td>Cabinet Decision to expand the school</td>
</tr>
<tr>
<td>Planning Application submitted</td>
</tr>
<tr>
<td>Planning Approval anticipated by</td>
</tr>
<tr>
<td>Award of contract for building works by the Cabinet</td>
</tr>
<tr>
<td>Reception class with 30 new places</td>
</tr>
<tr>
<td>Building work finishes</td>
</tr>
<tr>
<td>Full New Capacity (R-Y6) available from</td>
</tr>
</tbody>
</table>

4 **Financial Implications**

4.1 As part of consideration of the Update on Schools Capital Portfolio report dated 26 January 2015, Cabinet approved the proposal to expand Stonebridge Primary School. This report stated the total estimated cost of the project is provided for within the element of the School Expansion Programme of Works to be met from secured grant funding.

4.2 The proposed expansion of pupil numbers at the school will result in increased revenue costs associated with the additional provision. These costs will be met from the individual school’s budget, which will increase proportionately based on the formula allocation from the DfE. However, the proposed intake of additional pupils from September 2015 will mean that the school will not receive the increased grant until the following academic year as the calculation is based on the previous October’s pupil numbers. As such the school will require funding equivalent to 7/12 of the total additional grant to meet the costs of the expanded pupil numbers until the following year’s allocation is received. This shortfall in funding will be provided from existing Dedicated Schools Grant revenue budget as funding has been set aside for additional classes.

5 **Legal implications**

5.1 The procedure for the enlargement of Stonebridge Primary School is as required by The Education and Inspections Act 2006 (as amended by the Education Act 2011) and The School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2013. The local authority is entitled to make prescribed alterations to Stonebridge Primary School pursuant to powers granted by The Education and Inspections Act 2006, Sections 18 and 19 and in accordance with Schedules 2 and 3 Regulations.
5.2 The authority has the power to consider and determine proposals published under Section 19 of The Education and Inspections Act 2006, pursuant to Section 21 (2) (f) of the Act and in accordance with Schedule 3 paragraph 3 of The School Organisation Regulations 2013.

5.3 Under sections 13 and 14 of The Education Act 1996, as amended by The Education and Inspections Act 2006, a local education authority has a general statutory duty to ensure that there are sufficient school places available to meet the needs of the population in its area. The local authority must promote high educational standards, ensure fair access to educational opportunity and promote the fulfilment of every child’s educational potential. They must also ensure that there are sufficient schools in their area and promote diversity and increase parental choice. To discharge this duty the LA has to undertake a planning function to ensure that the supply of school places balances the demand for them.

5.4 The Brent Cabinet acting on behalf of the Brent Local Authority is the Decision Maker pursuant to The Education and Inspection Act 2006 Section 21 (2) (f) and schedule 3 of the School Organisation Regulations 2013.

5.5 The Cabinet would need to have regard to guidance issued by the Secretary of State before making a decision upon this proposal entitled School Organisation Maintained Schools – guidance for proposers and decision makers January 2014.

5.6 If the local authority fails to decide proposals within two months of the end of the representation period the local authority must forward proposals, and any received representations (i.e. not withdrawn in writing), to the schools adjudicator for decision. They must forward the proposals within one week from the end of the two month period.

5.7 Decision Making:

5.8 The department does not prescribe the exact process by which a decision-maker carries out their decision-making function. However, the body or individual that takes the decision must have regard to the statutory ‘Decision-makers Guidance’ (at Annexe B).

5.9 There are four key issues which the Decision Maker should consider before judging the respective factors and merits of the statutory proposals:

- Is any information missing? If so, the Decision Maker should write immediately to the proposer specifying a date by which the information should be provided.

  All necessary information has been provided.

- Does the published notice comply with statutory requirements?

  The statutory notice is complete and in line with the statutory requirements. The four week statutory representation period closed on 2 April 2015
• Has the statutory consultation been carried out prior to the publication of the notice?

**All applicable statutory requirements to consult in relation to the proposal have been complied with.**

• Are the proposals “related” to other published proposals?

**Yes, Stonebridge redevelopment proposals including Primary School Expansion and the Stonebridge Day Centre – (Report recommendations resolved at Cabinet, 23 February 2015, Item 8)**

5.10 **Types of Decision**

5.11 When issuing a decision, the decision-maker can:

• reject the proposal;

• approve the proposal without modification;

• approve the proposal with modifications, having consulted the LA and/or governing body (as appropriate); or

• approve the proposal – with or without modification – subject to certain prescribed events11 (such as the granting of planning permission) being met.

5.12 A proposal can be withdrawn by the proposer at any point before a decision is taken. When doing so the proposer must send written notice to the LA and the governing body (as appropriate) and the Schools Adjudicator (if the proposal has been sent to them). A notice must also be placed on the website where the original proposal was published.

5.13 **Rights of appeal against a decision**

5.14 25. The following bodies may appeal to the Schools Adjudicator against a decision made by a LA decision-maker, within four weeks of the decision being made:

• the local Church of England diocese;

• the local Roman Catholic diocese; and

• the governors and trustees of a foundation, foundation special or voluntary school that is subject to the proposal.

5.15 On receipt of an appeal, a LA decision-maker must then send the proposal, representations received and the reasons for its decision to the Schools Adjudicator within one week of receipt. There is no right of appeal on determinations made by the Schools Adjudicator.

5.16 **Procurement:** The construction contract associated with this expansion will be addressed as part of the wider primary school expansion contract. A report approved by Cabinet in January 2015 set out the procurement strategy to be adopted for this project and in accordance with Council Standing Orders gave approval to procure a works contract. Subsequent Cabinet approval would be sought to award any works contract in accordance with Council Standing Orders.
6 **Diversity Implications**

6.1 Stonebridge School has an ethnically diverse pupil population and catchment of pupils who need places. The expanded schools would enable the council to provide additional new places required for Brent’s growing pupil population.

6.2 The expansion will improve choice and diversity. The impact on Equalities will be kept under review and reported as the school expansion programme is reviewed.

6.3 An Equality Assessment has been completed for the proposed expansion of Stonebridge Primary School (Appendix 8).

7 **Staffing Issues**

7.1 With the expansion of pupil numbers there is likely to be an expansion of posts rather than a reduction. The costs relating to the need to provide for additional pupils will be covered by the Dedicated Schools Grant allocated through the funding formula. In the consultation, objectors have queried whether the school can recruit sufficient high quality staff to enable them to cater for such a large number of children. Staffing will, however, need to be built up gradually as the new numbers rise through the school.

8 **Background Papers**

Stonebridge Consultation Report

School Organisation Maintained Schools - Guidance for proposers and decision-makers - January 2014

9 **Appendices**

Appendix 1 Map of Brent Schools

Appendix 2 Stonebridge Primary School – consultation document

Appendix 3 Stonebridge Primary School – notes to meetings

Appendix 4 Stonebridge Primary School group letter

Appendix 5 Stonebridge Primary- Informal consultation analysis

Appendix 6 Stonebridge Primary School informal consultation responses

Appendix 7 Stonebridge School Statutory notice (Stage 1 of the statutory process)

Appendix 8 Equality Impact Assessment for Stonebridge Primary School and the area surrounding the school
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GAIL TOLLEY  
Strategic Director of Children and Young People

ANDY DONALD  
Strategic Director of Regeneration and Growth
Appendix 2 - Stonebridge Redevelopment Proposals including Primary School Expansion and the Stonebridge Day Centre – Update Report
Appendix 3 of the Report is not for publication

1. Summary

1.1 Appendix 1 of this Report details the lands that are the subject of this report, namely the former Stonebridge Day Centre currently Stonebridge Primary School Annexe (a temporary use), Stonebridge Primary School including the Welsh School, the Adventure Playground, Stonebridge Open Space and Waste Land, together referred to as the “Subject Lands”.

1.2 On 16 September 2013 the Executive approved the following principles of redevelopment of the Subject Lands, namely:

- That the existing Stonebridge Day Centre be redeveloped to provide new housing;
- That the listed Stonebridge Primary School be permanently expanded from two Forms of Entry (FE) to 3 FE accommodating ‘bulge classes’ currently located at Stonebridge Day Centre, subject to the School’s Governing Body’s consent;
- That the existing Adventure Playground be re-planned and improved;
- That the Stonebridge Open Space be re-planned and improved; and
- That residential development is bought forward in order to better utilise the lands.

1.3 Members also agreed at that Executive meeting that public consultation and negotiation be undertaken on the development proposals with local stakeholders, in particular the managers of the Adventure Playground, the Welsh School and the Secretary of State in relation to land adjacent to Stonebridge Primary School;
1.4 Following public consultation, this report is an update to Members, detailing the development of site proposals for the Subject Lands, setting out the process of public consultation on the most up-to-date plans and setting out the feedback received. Based on this, Officers have made various recommendations with regard to the redevelopment.

2. Recommendations

That the Cabinet approve:

2.1 The revised principles of redevelopment:

(i) That the former Stonebridge Day Centre site - currently the Stonebridge Primary School Annex (a temporary use) and Milton Avenue be re-planned to provide new homes;
(ii) That Stonebridge Primary School be expanded from 2 Forms of Entry to 3 Forms of Entry;
(iii) That in respect of the Adventure Playground the land be re-planned to form part of the expanded Primary School;
(iv) That the Open Space is re-planned to provide an equivalent area, of improved quality, running alongside the existing canal feeder;
(v) That the existing open space at the frontage of the site be re-planned for housing;
(vi) That the School building currently let to the Welsh School revert back to the Stonebridge Primary School; and
(vii) That an alternative proposal in respect of play provision be developed on site as appropriate.

2.2 That formal statutory consultation on the proposed expansion of Stonebridge Primary School from 2 Forms of Entry to 3 Forms of Entry is undertaken, subject to approval of the school’s Governing Body to proceed to this stage on the basis of the proposals approved by the Cabinet as described in this report.

2.3 That existing occupation arrangements (as per Confidential Appendix 3) with Brent Play Association are terminated and that the mitigation plan included within the Diversity Implications section of this report is implemented.

2.4 That existing occupation arrangement (as per Confidential Appendix 3) with Ysgol Gymraeg Llundain, the Welsh School are terminated and that the relocation plan at paragraph 3.47 is progressed.

2.5 That the Operational Director Property and Projects in consultation with the Operational Director Children and Young People be delegated authority to agree the terms of the termination arrangement with Brent Play Association. And that the Operational Director Property and Projects be delegated authority to agree the terms of the termination arrangement with Ysgol Gymraeg Llundain, the Welsh School.

2.6 That subject to the decisions made on the revised principles of redevelopment a subsequent report be submitted to a future meeting of the Cabinet for approval providing details of final plans for the expansion of the Stonebridge Primary
school and proposed redevelopment of the wider Stonebridge site and the associated forecast costs of the proposed redevelopment.

2.7 That the Chief Finance Officer determines the precise financing arrangements for the scheme, once costs and likely receipts are more certain.

2.8 That Cabinet note that the overall land receipts are expected to exceed the capital costs as per 4.5.

2.9 That Members note the findings of the Equality Analysis.

3 Detail

3.1 The former Stonebridge Day Centre site currently the Stonebridge Primary School Annex (a temporary use), comprises a 1960’s building of 1500m2 partially used to accommodate primary school ‘bulge classes’ until 2016/17. These classes are managed by the nearby Stonebridge Primary School which is earmarked for expansion to accommodate the ‘bulge classes’ on a permanent basis.

3.2 Stonebridge Primary School is a grade II listed Victorian building of 3,000m2 that operates as a 2 FE school. Adjoining the school are various parcels of land comprising an Adventure Playground, open space and unused waste land (see Appendix 1). London Borough of Brent is the owner of all the lands, including the school and Adventure Playground.

3.3 On 16th September 2013 Brent Executive approved the principles of redevelopment of the day centre, primary school, Adventure Playground and surrounding lands, and that public consultation be undertaken in respect of the proposed scheme.

3.4 Redevelopment plans were discussed with the Governing Body of the school, Brent Play Association (BPA) (the organisation that occupies the Adventure Playground) and the Welsh School (the organisation that occupies buildings in Stonebridge Primary School).

3.5 The equality analysis that accompanied the 2013 report identified a negative impact on the Welsh School which Officers have subsequently sought to mitigate through negotiation - see paragraphs 3.43 to 3.47 on the Welsh School below for further details.

3.6 Since the 2013 Executive approvals, the nearby former Pupil Referral Unit was vacated by Brent’s Children and Young People Department. It was subsequently agreed that a license be given to the Stonebridge Primary School to make use of the building during the period that redevelopment plans are further developed.

3.7 There is a small building located in the Adventure Playground. A condition survey undertaken in December 2014, shows that the property appears generally to be in a satisfactory condition. The projected cost of planned
maintenance, repairs and improvements for this building going forward is as follows:

<table>
<thead>
<tr>
<th></th>
<th>Emergency Test / Repairs</th>
<th>Maintenance Costs</th>
<th>Planned Replacements</th>
<th>M&amp;E</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Expenditure Year 1</td>
<td>£8,300.00</td>
<td>£4,000.00</td>
<td>£0.00</td>
<td></td>
<td>£41,750.00</td>
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<td>Expenditure Years 2 to 5</td>
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<td>£0.00</td>
<td></td>
<td>£31,000.00</td>
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<tr>
<td>Expenditure Years 5 to 10</td>
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<td>£22,000.00</td>
<td>£34,500.00</td>
<td></td>
<td>£13,850.00</td>
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<td>£6,900.00</td>
<td></td>
<td>£14,250.00</td>
</tr>
<tr>
<td>Expenditure Years 15 to 20</td>
<td>£0.00</td>
<td>£26,000.00</td>
<td>£3,300.00</td>
<td></td>
<td>£11,050.00</td>
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<tr>
<td>Total 20 Year Costs</td>
<td>£8,300.00</td>
<td>£92,000.00</td>
<td>£44,700.00</td>
<td></td>
<td>£111,900.00</td>
</tr>
</tbody>
</table>

3.8 With regard to the new homes proposed in Stonebridge, the following Executive reports are noteworthy as they may impact residential proposals:

- On 11 November 2013 the Executive Report on the Housing Revenue Account (HRA) asset management strategy affordable housing development approved proposals for Brent to start self building new affordable homes.
- On 17 February 2014 the Adult Social Care Market position statement (MPS2014) resulted in work being undertaken on the New Accommodation for Independent Living (NAIL) project and report to Cabinet in July 2014 that sets out self development options in respect of adult social care housing provision.

Proposals

3.9 The fundamental objectives of the proposals are to deliver an expanded 3 FE primary school in Stonebridge and in so doing to secure an amount of ‘enabling’ residential development that will contribute towards the cost of this, an improved open space for the area and the release of the former day care centre site (currently Stonebridge School annex) for alternative uses. To this end Southstudio Architects have been appointed to prepare redevelopment proposals. Appendix 2 sets out the proposed land uses across the main site.

3.10 The need to provide additional school places to help meet ongoing increases in demand is well documented. The proposal is to expand Stonebridge Primary School, which currently has a good Ofsted rating, by 210 places to help meet growing demand. The school currently has 420 pupils at the main school site and 180 in the Annex building (the former Stonebridge Day Centre – temporary ‘bulge classes’). The proposal is to expand the Primary School from 2 FE to 3 FE. This would mean Stonebridge Primary School would have 630 primary school places in total.

3.11 In order to accommodate the expansion in a feasible manner, it has become clear that it will be necessary to make use of land currently occupied by the Adventure Playground. Although early feasibility proposals indicated that there may be a prospect of the expanded school not requiring additional land take, subsequent testing has demonstrated that this is not feasible.
3.12 Options have been explored which increase the school site area to meet the current space guidelines. This will ensure that the expanded school has an appropriate amount of outdoor play space, which in turn will provide opportunities for the school to open up the space for wider use than is currently possible. The latest iterations of the design for the school look to improve access arrangements, which are currently congested. A new safe pedestrian entrance into the school will be introduced, which would be approached via pedestrian footpaths through the new landscaped open space.

3.13 The existing Welsh School would no longer be accommodated within the site. These proposals are subject to further design development with the School. The new proposals would result in the loss of the existing site for the Adventure Playground. This will require the termination of the existing occupation arrangements with Brent Play Association (BPA).

3.14 The proposed scheme would see a considerable improvement in the quality of open space provision across the site, by moving the space away from Hillside – where it adjoins a busy main road and relocating it along the southern part of the site to incorporate the canal.

3.15 The current open space would then be developed for mixed tenure residential development, which would ultimately make a financial contribution to the redevelopment of the school. The scale and mix of this development will be worked up as part of the planning application but is likely to be predominantly private and intermediate products in recognition of the overwhelming concentration of affordable social housing in the vicinity.

3.16 The delivery of this scheme will then negate the need for Stonebridge School to make use of the temporary annex currently provided at the former Day Care Centre. Alternative development proposals for new homes will be brought forward for this site.

Consultation Process

3.17 Extensive consultation has been undertaken to seek the views of residents and interested parties on the redevelopment proposals. The consultation period ran from Monday 6th October 2014 to Monday 17th November 2014. A consultation leaflet was produced which included details of the proposals and sought views through two open questions:

- Please tell us what you like about the proposals and why; and
- Please tell us what you would like changed and why.

3.18 A website was created setting out consultation information with an on-line response portal.

3.19 This consultation exercise formed part of the consultation process for school expansion.

3.20 Five face to face consultation events were held:
<table>
<thead>
<tr>
<th>Date</th>
<th>Venue</th>
<th>Event Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>14 October 2014</td>
<td>Stonebridge Primary School</td>
<td>Drop in consultation event for parents, teachers and pupils</td>
</tr>
<tr>
<td>21 October 2014</td>
<td>Bridge Park</td>
<td>Brent Connects – Presentation and Question and Answer Session</td>
</tr>
<tr>
<td>29 October 2014</td>
<td>The Hub, Hillside</td>
<td>Drop in consultation event</td>
</tr>
<tr>
<td>5 November 2014</td>
<td>The Hub, Hillside</td>
<td>Drop in consultation event</td>
</tr>
<tr>
<td>12 November 2014</td>
<td>Stonebridge Primary School</td>
<td>Drop in consultation event</td>
</tr>
</tbody>
</table>

3.21 Ahead of the start of formal consultation, meetings were held with the Governing Body of Stonebridge School, the Governing Body of the Welsh School, Brent Play Association, the Head-teacher and Governing Body of Our Lady of Lourdes - a nearby Catholic 1 FE Primary School sitting opposite Stonebridge Primary School and the Diocese of Westminster.

3.22 Public consultation was widely advertised as follows:

- At the start of the consultation leaflets were delivered to properties within 0.5 miles of the ‘subject site’, all pupils of Stonebridge Primary School, the BPA and Our Lady of Lourdes. Further leaflets were issued on 7 November to the Fawood Children’s Centre, the Hub, Hillside reception, Brent START Stonebridge, Hillside Primary Care Centre and St Michael’s nursery. A total of 6,700 leaflets were distributed over the course of consultation.
- Consultation information was provided to the local press.
- A link to consultation information was sent to a long list of organisations, see appendix 5 (the consultation analysis report) for full details.

3.23 Ahead of the start of the formal consultation process, BPA started a campaign to save the Adventure Playground. This generated considerable local press coverage.

Petition

3.24 On 28 October 2014 the Council received a petition calling for the retention of the Stonebridge Adventure Playground. The petition comprises of 1,042 paper signatures and 152 on line signatures, under the heading:

“We the undersigned insist that the redevelopment of Stonebridge School and the new housing includes keeping the Stonebridge Adventure Playground open”.

Asset of Community Value

3.25 On 31 October 2014 the Stonebridge Park Adventure Playground was entered as nominated land on the Council’s list of assets of community value. Under Section 95 of the Localism Act – ‘moratorium on disposal of listed assets’, the owner (London Borough of Brent) must not enter into a relevant disposal of land unless certain conditions are met.
3.26 The proposal is to change the use of the Adventure Playground. It is not intended that the Council will dispose of the listed assets as part of these redevelopment proposals.

Consultation Outcome

3.27 Around 60 individuals attended consultation events (excluding Brent Connects which was not exclusively for this consultation) and 90 written submissions have been received (leaflets, on line and 17 A4 signed standard documents). Two thirds of the written responses were from people in Brent or Brent organisations. The Council also received one response on the phone ahead of the start of the consultation and this comment has been added to the summary of the verbal comments made at the consultation events.

3.28 The majority of responses focused on the loss of the Adventure Playground and the desire to keep this provision. A number of responses only discussed the Adventure Playground, with many of these respondents saying they did not like anything about the proposals.

3.29 Key consultation messages are as follows:

(i) Former Stonebridge Day Centre. There was a mixed response as to whether there should be more housing. For those who did wish to see more homes there was a desire for houses as opposed to flats and for homes to be affordable. There was a desire for no high rises and for good design.

(ii) Stonebridge Primary School Expansion. Respondents said that the school expansion should be re planned so not to be at the expense of the Adventure Playground or to leave the school on two sites. Due to the school having the annexe site it was felt that the school expansion was only providing a further 30 places. There were respondents who welcomed the school being on one site.

(iii) The Adventure Playground. Respondents highlighted the importance of the safe and supervised nature of the provision. The importance of the facility in terms of childcare – including after school and summer school provision was emphasised. The point was made that it was a safe place for children to go, without which they could partake in anti-social behaviour/crime. Respondents valued the play facilities (including the indoor space) and the facility being a free provision.

(iv) Open Space re-location and improvements. People wanted to see the open space improved. The proposed open space and improvements to the canal feeder were welcomed. Respondents did not want to see a loss of open space or trees.

(v) Welsh School. There were limited responses on the Welsh School. A few responses questioned what the future of the Welsh School would be.

(vi) Other issues. Generally the location of the proposed new play space was not supported as it was seen as unsafe as it was by a road and unsupervised. Traffic and parking issues were raised both with regard to the need to address the current situation and the potential impact of the new proposals. Respondents said the proposals need to ensure community cohesion.
3.30 A detailed consultation report is attached to this report as Appendix 5. Key messages are analysed in the Equalities Analysis at Appendix 4 and a mitigation plan is set out in the equalities section 6 below.

Planning Comments

3.31 The Stonebridge Primary School forms site specific allocation 19 of the Local Development Plan. The allocation is for residential development to the rear of the site, where it will have a limited impact on the setting of the Listed Building.

3.32 Key policy considerations:-

- Impact on the setting of the Grade II Listed School Building
- Impact on open space
- The need to mitigate any impacts on the Adventure Playground
- Impact on biodiversity

3.33 The impact of the proposed development on the Listed Building and its setting must be fully considered. In accordance with the National Planning Policy Framework (NPPF), a statement will be required on the significance of the heritage asset, including the contribution made by its setting. It must be demonstrated the proposed development would not harm the heritage asset, and would make a positive contribution to local character and distinctiveness.

3.34 The area to the north of the school comprises open space. The ‘wasteland’ is not accessible to the public, derelict and does not provide any recreational opportunities; it is therefore not considered to constitute open space. In accordance with the NPPF and London Plan policy 7.18, the open space must be replaced by at least equivalent provision in terms of quantity or quality. The re-provision must be within the footprint of the site.

3.35 The Adventure Playground is a community facility which contributes to play provision. As required by London Plan policy 3.16 and Core Strategy policy CP 23, given the identified need for play in this area, re-provision will be required of a facility that will meet an equivalent need to the existing Adventure Playground. In determining what constitutes equivalent provision consideration needs to be given to the age range the existing facility serves, the provision it offers and its opening times.

3.36 A Grade II Site of Importance for Nature Conservation runs along the canal feeder on the eastern boundary of the site. In addition, the open space and ‘wasteland’ is likely to have ecological value. An ecological survey of the site will be required, and any scheme should seek to provide net gain in biodiversity as far as is possible, as required by the NPPF.

Brent Play Association

3.37 The council has a contract with BPA for the provision of play services in Brent and pursuant to that contract BPA occupies the Brent owned Adventure Playground and manages and maintains the area. As occupation of the
Adventure Playground is required by the contract for the provision of play services, Brent receives no rent in respect of BPA’s occupation of the Adventure Playground. The rental guide depending on lease term is between £10-15,000 per annum. Planning applications date back to 1974, 1975 and 1985 relating to buildings in the Adventure Playground area. The newer adventure play equipment has been funded by the Big Lottery Fund and the grant agreement is in the name of Brent Council.

3.38 BPA is a registered Charity (No: 1085110). Companies House records inform BPA were incorporated in 11 November 1999. BPA’s accounts for the years ending March 2013 state their objectives as follows:

“The charity's object and its financial activity continues to be that of providing and supporting facilities within the London Borough of Brent and surrounding areas for the daily care, play, recreation and education of children and young people seven days per week and school holidays and also provide day respite and learning opportunities for children and young people with special needs up to the age of 18 years”.

3.39 In respect of the Adventure Playground, the BPA March 2013 accounts state:

“The charity currently runs an all year round club in the Stonebridge Adventure Centre, on behalf of Brent Council. It offers integrated facilities for children and young people with special needs, ‘state of the art’ Adventure Playground structures and indoor facility which include art and craft room, TV and video room, main hall and kitchen”.

3.40 The BPA service at Stonebridge is not Ofsted registered. The BPA services at the Stonebridge Adventure Playground run from Monday to Friday during term time, from 2pm to 7pm, on Saturdays from 11am to 4pm and during School Holidays from 7am to 6pm. The core age range is 5 to 13 year old young people.

3.41 BPA received funding of £118,000 from Brent in 2014/15 under a contract for the provision of play services. The BPA March 2013 accounts highlight the Stonebridge free facility as a one off, funded primarily by Brent. BPA’s accounts show that for the year ending 31 March 2013, the grant received totalled £315,304 (£211,304 67% from Brent), equating to 95.7% of the BPA’s total income. A report to Brent’s Cabinet of 15 December 2014 from the Chief Finance Officer, as per recommendations from the Strategic Director, Children and Young People proposes:

‘to cease contract for play provision with the Stonebridge Adventure Playground, this funding to BPA provides after school and holiday provision for children at the SAP which is free to the families at point of delivery and is unique to this area. It is proposed to cease this funding as it is no longer sustainable or justifiable in the current financial climate”.
3.42 Officers in a separate report to this Cabinet meeting are recommending that the current funding arrangements with the BPA be terminated.

The Welsh School

3.43 The Ofsted report of 2013 identifies that the Ysgol Gymraeg Llundain (The Welsh School London) was established in 1958. The school relocated to its current site at Stonebridge School in 2004.

3.44 Officers understand the Welsh School’s occupation was agreed directly with Stonebridge School. A below market rent is paid to Stonebridge School - a position which Council Officers have been looking to regularise for some time.

3.45 The Welsh School is a non-selective, co-educational independent day school for pupils between the ages of 3 and 11 years. As at the inspection date there were 34 pupils on roll, of whom five were part time. It is understood that only a handful of students are from Brent.

3.46 The school is run by a board of directors on behalf of the Welsh Schools Trust and aims to provide ‘bilingual Welsh education outside of Wales’.

3.47 Since September 2013’s Executive approvals, Officers have been in negotiation with the Welsh School and a relocation plan to the former Bowls Club Pavilion, King Edwards VII Park, Park Road, Wembley HA9 7RX has been agreed in principle subject to the Welsh School securing planning consent and Fields in Trust approval. Officers are recommending that the current occupation arrangement with the Welsh School is terminated. A planning application has been submitted and was deferred for further consideration by the planning committee on 13th January 2015. It is expected that a decision will be made at the planning committee on 4th March 2015.

Next Steps

| Discussions with BPA concerning the vacation of the Adventure Playground | February 2015 |
| Welsh School relocation plan negotiations continue | February 2015 |
| Stonebridge Primary School Statutory Consultation ends | April 2015 |
| Planning Application target date | June 2015 |
| Tender for School expansions works | June 2015 |
| Option Analysis in respect of proposed new Housing. | June 2015 |
| Marketing of lands as required | August 2015 |
| School expansion works end | October 2016 |
4 Financial Implications

4.1 Capital funding for the expansion of Stonebridge Primary School was originally approved as part of the Phase 3 programme in the August 2012 Executive report on the strategy for provision of sufficient primary school places, and subsequently re-affirmed in the May 2013 Executive report.

4.2 In an Executive report dated 11 November 2013 (from the Strategic Director of Regeneration and Growth and the Acting Director of Children and Families) titled School Expansion Programme - Phase 2 Permanent Primary School Expansion Works Contract and Portfolio Update, under phase 3 and 4 permanent primary school expansion plans, Stonebridge School is noted as planned to expand by one FE by December 2015 with funding from Department for Education (DfE) including Targeted Basic Need grant of £316,000, which must be spent by September 2015 otherwise the funding is at risk. The total current provision for the school expansion is £3.5m. If the school expansion was not to progress this funding would have to be returned to the DfE.

4.3 The report to Executive in September 2013 advised that the capital receipts arising from the proposed disposals in the area are estimated to be in excess of £9m. The indicative marketer’s opinion of land value for the three sites is £7.6m for the combined sites, assuming 30% affordable housing. These assumptions will be reviewed following the agreement of the final site configuration.

4.4 The disposal of the former Day Centre Site, current Stonebridge Primary School annexe is included in the Councils Capital Disposals Programme for 2016/17 at a forecast value of £1.5m. As such the amount available from any capital receipt arising, as detailed in paragraph 4.3, will be net of this £1.5m which is already included in forecasts for the future funding of the Council's capital programme.

4.5 At present costs arising directly from the sale of the sites and overall proposed scheme costs (excluding the primary school expansion) are proposed to be met from the capital receipts arising. As these costs cannot be fully defined until there is an agreed configuration for the site this will be subject to a further report to be submitted to a future meeting of the Cabinet. This will also need to be reviewed further and reported upon should self development of the housing options be pursued.

4.6 Due to timing requirements of works and the availability of land for sale, costs would need to be met initially from the Council’s overall Capital funding resource. Again, as costs cannot be fully defined at this time, consideration of affordability and funding requirements will need to be subject to a further report to be submitted to a future meeting of the cabinet.

4.7 The financial consequence of ending the Welsh School’s ongoing occupation of the site will impact lease income derived by Stonebridge Primary School which is currently £10,500 per annum. This does not have a direct impact on the Council’s budget. This small loss of income is not an issue for the governing body of the school.
4.8 If existing occupation arrangements with BPA are terminated, there would be costs arising associated with the move of the Adventure Playground. These have been estimated at £220k for demolition and clearance, and £830k for re-provision. The demolition costs would be required for the expansion of the school and open space. The costs of re-provision would be dependent on the type of facility re-provided and the implementation of the mitigation plan. Any re-provision will remain as an asset to the Council.

4.9 If the Adventure Playground is closed, a sum of £40,267 would need to be paid back to the Big Lottery Fund in respect of total grant received of £199,555 to develop the Adventure Playground under a Deed of Dedication for 10 years, entered into on 22 July 2008.

4.10 The revenue funding of £118,000 for the year 2014/15 paid by Brent to BPA, contributing to management and maintenance of the Adventure Playground, is under consideration as part of the overall Council Savings Proposals for 2015/16 (see Contract with Brent Play Association for Stonebridge Adventure Playground paper).

5. **Legal Implications**

5.1 Under Section 123 of the Local Government Act 1972, the Council has a general power to dispose of properties including by way of the sale of the freehold or the grant of a lease. The essential condition is that the Council obtains the best consideration that is reasonably obtainable.

5.2 Disposal on the open market either via auctioneer, marketing agent (sealed bids tender) or to a special purchaser by way of private treaty will satisfy the best consideration requirement.

5.3 The Adventure Playground was part funded by the Big Lottery Fund (BPL) and therefore is subject to title restrictions to reflect the funding agreement which required the consent of the BPL to any works or disposal of the site.

5.4 Terminating BPA’s funding arrangements and allowing the current contract to expire on 31 March 2015 leading to the termination of BPA’s licence to occupy and require BPA to give up possession of the Adventure Playground on the same date, failing this Officers would take steps to secure possession.

5.5 In order to avoid the Adventure Playground site being vacant until the site is required for the proposed redevelopment in September 2015, Officers could look to offer the space to the market for an interim use or alternatively look to agree a temporary license with BPA. Should this option be used, appropriate property arrangements would need to be put in place to allow the Council to obtain immediate possession once the site is required.

5.7 The Shakespeare Road site is subject to a covenant in favour of the Homes and Communities Agency in summary providing for relevant percentage of the disposal proceeds of redevelopment of the land other than for educational facilities to be invested within a 3 year period thereafter in the re-provision or enhancement of facilities at Our Lady of Lourdes and /or Stonebridge School or
in any other education or community facilities in the Stonebridge Area – potentially assisting proposals at Bridge Park.

5.8 The disposal or land swap of qualifying school playing fields forming part of the site will require an application to the Secretary of State for the consent under education legislation if it does not come within the categories which have deemed consent under the General Consent. To mitigate this plans maintain the school site size. Initial legal advice confirmed the application can therefore be dealt with as class consent to change the use of the land and not dispose, this has also gained support from Sport England.

5.9 Any disposal of any land or building used for school or education purposes in the last 8 years requires the consent of the Secretary of State.

5.10 The Welsh School has occupied the school site under an agreement with Stonebridge School in accordance with an agreement made between Brent Council and Stonebridge Primary School some years ago.

5.11 Any proposal to dispose of public open space will need to be advertised under Section 123 2(A) of the Local Government Act 1972 in the local press on two consecutive publication dates giving 21 days from the first publication date for representations to be made to the Council.

5.12 Land registered with a local authority as land of community value land cannot in general be disposed of (save for an exempt disposal) within a 6 month period following the community land registrar being given requisite notification of a proposed disposal by the owner if within 6 weeks of the owner’s notification a community group informs the community land registrar of a wish to be considered as a bidder for the land.

5.13 A disposal of land of community value for this purpose is in summary the disposal of the freehold or the grant or assignment of a qualifying lease subject to certain conditions. The proposal in this Report to change the use of the Adventure Playground is therefore not a disposal of land of community value.

Formal Statutory School Expansion Process

5.14 The different stages are set out below.

1. Consultation (informal) - which we have just completed. The governing body and the LA must decide if they still want to go ahead with the expansion given the level of objections.
2. Publication - statutory notice in the local paper explaining the details of the expansion and surrounding plans.
3. Representation (formal consultation) - at least another 4 weeks for the public to give their views. At this stage most of their questions should be addressed.
4. Decision - report to Cabinet giving all the details of the two consultations. The Cabinet has two months to make the decision.
5. Implementation - if the Cabinet decide the school should expand this is the period that the changes take place.
6. Diversity Implications

6.1 On 16 September 2013, the Executive approved the principles of redevelopment. The proposals included the relocation or termination of arrangements with the Welsh School, which was a negative impact which Officers have been looking to mitigate. The council is in active discussions with the Welsh School and a relocation plan has been agreed in principle, subject to planning consent and Fields in Trust approval.

6.2 In respect of current proposals, the loss of the Adventure Playground will negatively impact BPA, its staff and BPA service users (children and their families). Due to the local make up (as per 2011 census data) which comprises a higher than average 5-19 year old population in an area with a high concentration of socially rented homes which suggest deprivation, BPA services are likely to be in demand.

6.3 The most up-to-date plans result in the following impacts:

<table>
<thead>
<tr>
<th>Area</th>
<th>September 2013</th>
<th>February 2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stonebridge School</td>
<td>Positive</td>
<td>Positive</td>
</tr>
<tr>
<td>Adventure Playground</td>
<td>Positive</td>
<td>Negative</td>
</tr>
<tr>
<td>Open Space</td>
<td>Negative</td>
<td>Positive</td>
</tr>
<tr>
<td>The former day centre site &amp; housing</td>
<td>Positive</td>
<td>Positive</td>
</tr>
<tr>
<td>Welsh School</td>
<td>Negative</td>
<td>Positive</td>
</tr>
</tbody>
</table>

6.4 Public consultation was undertaken on current proposals resulting in a well publicised campaign to save the playground and a petition being submitted to the Council, the majority of 60 attendees at consultation events and 90 of the paper responses focused on keeping the Adventure Playground provision.

6.5 To mitigate against this negative impact, the following accommodation based solutions could be developed:

- Redesign the school expansion plans to see if at all possible the Adventure Playground can stay put, as above. The plan produced by the architect’s shows a severely compromised open space solution which would need to be measured to ensure no loss of area. Officers have discussed the plan with BPA and the initial feedback is that the proposals are unsuitable in the main.
- To work with the adjoining land owner Hyde Housing Association – Hillside Housing Trust, considering options on their land. The principle has been discussed, though the detail needs to be worked through.

6.6 In respect of the BPA service, the December 2014 Cabinet report from the Chief Finance Officer proposed funding cuts. The Brent Cabinet forward plan / agenda for the meeting on 23rd February 2014 includes a paper from the Strategic Director of Children and Young people on the proposed funding cuts including an equality analysis and mitigation plan. Only if the service’s mitigation plan requires accommodation for BPA will accommodation solutions be developed.
6.7 In respect of consultation overall, in future Officers will look to find ways in which to better engage with all sections of the community in particular Asian households who although forming 17% of the local community in the 2011 census, failed to respond to the consultation.

6.8 All other outcomes of consultation will be further developed as proposals move through planning. Particular to the open space, Officers will work with colleagues in Sports and Parks to develop an alternative solution to the play space which the public said they did not like.

6.9 Officers recognise the mitigations may not fully mitigate all negative impacts and that some may not work for various reasons. However due to ongoing demand for school places and homes, the recommendation is to proceed as proposed. Leaving the Adventure Playground in situ would compromise the overall development impact.

7. **Staffing/Accommodation Implications (if appropriate)**

7.1 There are no staffing/accommodation implications for Brent Council employees. There would be staffing implications for the Brent Play Association and the Welsh School.

8. **Background Papers**

1. Executive Report 16th September 2013: Stonebridge redevelopment proposals including Primary School Expansion and the Stonebridge Day Centre
2. 11 November 2013 the Executive Report on the Housing Revenue Account – asset management strategy affordable housing development.
3. The 17 February 2014 Adult Social Care Market position Statement

9. **Appendix**

1. The Stonebridge ‘Subject Lands’
2. New Proposed Site Plan
3. EXEMPT Occupation Status of Welsh School and Brent Play Association. Confidential
4. Equality Analysis
5. Consultation Report

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Appendix 1 - The Stonebridge ‘Subject Lands’
Appendix 2 – New Proposed Site Plan
Appendix 3 - Historic England’s Pre-Application Advice
Dear Mr Brearley

Pre-application Advice

STONEBRIDGE PRIMARY SCHOOL, SHAKESPEARE AVENUE, BRENT, LONDON

Thank you for consulting Historic England regarding the proposal to construct a new linked building and make internal alterations at Stonebridge Primary School, with the aim of expanding to three-form entry.

We appreciate that a degree of adaptation is required to make historic schools function for the same purpose today, and acknowledge the benefits of retaining these buildings in educational use. Were this proposal to be submitted as at present we would not raise an objection to the general principals of creating a new internal circulation core, and constructing a new building to the east of the listed school. We would, however, express reservations about the manner of linking the listed building to the new structure.

Advice

Significance of the building

Stonebridge Primary School is a grade II listed, red brick early twentieth century board school, in an attractive Queen Anne style with large windows and Flemish gables. Additions were made to the (west) entrance front in the latter half of the century, and some minor internal changes have taken place. The school retains good small workshop outbuildings and apart from the western additions is externally relatively unaltered.

Proposals and Impact

The current circulation arrangement causes problems in the functioning of a modern school, but as you acknowledge, the staircases are of high significance and should be
retained. We therefore consider that the proposed approach of appropriating a classroom on each floor to become a new stair core is a suitable one, subject to careful detailing and retention of historic structural and decorative fabric as far as possible. We consider that alterations to the upper hall, as discussed, are likely to be acceptable, as long as the divisions are reversible, remain at a low level, and the roof structure remains fully visible.

The proposed new building would be two storeys, and be situated on land to the east behind and beside the engineering workshop, a curtilage listed building. It is beneficial, as proposed in recent iterations of the design, to ensure that the new building is separated from the Edwardian workshop, to retain its fabric and the sense of its form as an outbuilding. We consider that a new building of the general massing and form proposed would not cause undue harm to the significance of the listed building. Although it has a very large footprint, its considerably lower height and separation from the listed block by the playground means that it would be likely to read as subservient to the listed building. We appreciate the desire for the building to be coherent in its own right and consider that a contemporary design is appropriate, but to ensure that the building does not appear too dominant it would be beneficial for the materials, in colour and texture, to sit harmoniously alongside the listed building and the engineering workshop.

The new building is proposed to be linked to the listed building with a first floor corridor, stretching across the playground and joining the listed building through a modified window opening. The eastern elevation of the listed school is well-composed, formal and mostly symmetrical. Given its height and the open playground it overlooks, it is highly visible from various positions in the surrounding area. Adding any enclosed bridge link to this elevation at first floor level will necessarily cut off views of this elevation, projecting very prominently from the centre of the façade. We consider that it may not be possible to resolve this in a satisfactory way without compromising this important façade. We recommend that the requirement for a fully enclosed link is reconsidered, and that solutions such as a covered, open-sided walkway at ground floor level could be explored as an alternative.

Policy
Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 makes it a statutory duty for Local Planning Authorities to consider the impact of proposals on listed buildings and their settings.

Guidance on the fulfilment of statutory planning duties is set out in the Government’s National Planning Policy Framework 2012 (NPPF). Fundamental to the NPPF is a presumption in favour of sustainable development. This includes a core principle which states that heritage assets should be conserved in a manner appropriate to their significance. Section 12 of the NPPF is devoted to the conservation and enhancement of the historic environment, and includes the following paragraphs of direct relevance to this case:

- Paragraph 132 - Local Authorities should put great weight on an asset’s conservation, and the more important the asset the greater the weight of consideration. The significance of an asset can be harmed by development within its setting.
- Paragraph 134 - where proposals would lead to less than substantial harm to the significance of a designated heritage asset, harm needs to be weighed against public benefits.

We consider that the link element of the proposals would be likely to cause some harm to the listed building. If the proposals were submitted in their current form, we would therefore advise the local authority that paragraph 134 of the NPPF should apply, and that the harm should be weighed against the public benefits.

**Position**

We are content with the general principals of the new structure and internal alterations, subject to detail. We recommend that alternative options to the link element of the scheme are explored.

**Next Steps**

Thank you for involving us at the pre-application stage. We are broadly content with your proposals, subject to you addressing the issues as outlined above before any statutory approval is sought.

Yours sincerely
STONEBRIDGE PRIMARY SCHOOL, SHAKESPEARE AVENUE, BRENT, LONDON

Pre-application Advice

List of information on which the above advice is based