1 Morland Gardens planning application – how significant is "significance"?

Guest blog by Philip Grant, in a personal capacity

Back in February, I first wrote about the 1 Morland Gardens planning application (<u>Housing or Heritage? Or both?</u>), under which Brent Council propose to demolish a locally listed Victorian villa in Stonebridge, to build a new adult education college and 65 affordable homes on the site.



2 Morland Gardens, the "twin" Victorian villa that was sympathetically converted (Photo by Harry Brown)

Because of some defects in the original application, identified from "consultee comments", a new batch of plans and documents has recently been submitted. Public consultation is now open again on application 20/0345, until Thursday 16 July. One of the new documents is a Heritage Impact Assessment ("HIA") [see copy below], and this is what raises the important question in my title.

Locally listed buildings are those which have been identified by a Council as "heritage assets". "Significance" for planning purposes is defined as: "The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic."

Brent's planning policies (like national ones, and the London Plan), acknowledge the importance of heritage assets, and set out how they should be protected when there are any proposals affecting them. The policy states: 'The council will resist significant harm to or loss of heritage assets.' Anyone considering a development should start with 'an understanding of the architectural or historic significance of the heritage asset and its wider context.'

Brent Council is capable of doing this, as the current application for the locally listed Clock Cottage at Kenton Grange shows. Those plans conserve the old cottage, while building assisted-living flats for disabled people around a courtyard (former stables) behind it. Unfortunately, whoever was giving planning advice, to the Council Officers / Lead Member for the 1 Morland Gardens scheme, either did not understand the policies over heritage assets, or thought they could be ignored (because it was a Council scheme, Planning Committee would "rubber stamp" it?).

When the original application was submitted in February, Brent's planning agents claimed that the locally listed Victorian villa had **'minimal significance'**, without providing much evidence to support that, and ignoring existing evidence (such as Brent's existing local listing assessment, which gave it a significance score of 8 out of 12). Local historians knew this was

nonsense, and launched a campaign to save the building (originally known as "Altamira")'. Their petition, asking the Council not to demolish the building, achieved 368 signatures.



Cutting from the "Brent & Kilburn Times", 5 March 2020.

I submitted my objection comments in early March, explaining in detail why the application's assessment of heritage significance was false, and recommending that Planning Officers should advise their Council colleagues to withdraw the application. This appeared to have no effect.

In April, a copy of the <u>comments on the application by Brent's Principal Heritage Officer</u> was obtained. He said that 1 Morland Gardens '**should be considered an important local heritage asset of high significance**.' He also pointed out that the applicants (Brent Council) had not provided a proper appraisal of the heritage asset, and the impact of their proposals on it, as required by Brent's own planning policies, and said 'the applicants should seek further advice from a heritage specialist to gather further evidence in support of this application.'

The June 2020 HIA is in response to the Principal Heritage Officer's comments. The document was prepared on the Council's behalf by Messrs Lichfields, who describe themselves as 'the pre-eminent planning and development consultancy in the UK.' Lichfields report was prepared by heritage specialists, but they were aware why their client (planning agents, acting on behalf of Brent Council) needed that report, at such a late stage in the planning process - to support their planned demolition of the building!

In the introduction to their report, Lichfields make clear that: 'The overview of the significance of the heritage assets has been undertaken using a combination of desk-based study and archival research.' They go on to say that: 'Fieldwork was not possible due to the current Covid-19 situation.' In other words, they only looked at a limited number of documents, and did not come to look at the building, its setting or the surrounding area.

Despite the limited material available to them, they reached the conclusion: 'the building is of **low significance'**. Explaining how they reached this conclusion, their report says: 'The methodology for our assessment of significance draws from the NPPF, HE's Conservation Principles and the DMRB.' The table they show for the criteria used is taken from the DMRB, and their conclusion is also: 'In summary and according to DMRB significance criteria (set out in Section 1), the building is of **low significance** as it is of low historic and architectural importance and of local interest only.'

DMRB? No, I hadn't heard of it either. It is actually the <u>Design Manual for Roads and Bridges</u>, issued by Highways England in 2019, as guidance for designing national infrastructure projects such as trunk roads and motorways. Your guess, as to why the HIA used those criteria, may be similar to mine – to get the "right" result for their client! Why not use Brent's own significance scoring criteria for locally listed buildings, which was adopted by the Council's Planning Committee in July 2015?

Eligibility Criteria	Scores (in brackets)
Authenticity	As appropriate for either of the following:
	a) Almost all original features retained (3); or
	b) Most features retained (2); or
	c) Some features retained (1).
	(maximum total = 3)
Architectural significance	As specified for each of the following
	d) an example of a style of building that is unique to the local area or a good surviving example of an historic architectural style (2);
	designed by notable local or national architects, engineers or designers; or an example of a particular technological innovation in building type, material or technique (1).
	(maximum total = 3)
Historic/ archaeological significance	As specified for each of the following
	 strong community or socio-economic development significance, such as schools, institutions or an important part of the Borough's industrial and military history (2); or
	 g) association with an important historic figure, local or national; or important local historic events (1).
	(maximum total = 3)
Townscape significance	As specified for each of the following
	building groups, including groups or terraces buildings, structures or features, which help form an attractive local character (2);
	 good examples of town planning layout; or notable buildings, or structures on important routes into the area, or key landmark buildings or features, which create a vista or contribute to the skyline (1);
	(maximum total = 3)

Brent's significance scoring system for locally listed heritage assets, adopted July 2015.

The HIA does refer to that system, claiming that the significance score for 1 Morland Gardens should be 6 out of 12, rather than the 8 out of 12 given to it for its entry in Brent's local list. I will explain why I believe they are wrong.

One of the "sources" their desk-based assessment used for considering the historic development of the area was a "Brief History of Stonebridge", produced by the Grange Museum and Brent Archives. The author of that booklet has already submitted an objection comment, pointing out that a quotation used from it was taken out of context. The HIA had used 'it was never as grandiose as its planners had originally intended' to play down the importance of the 1876 Stonebridge Park development. The author had actually compared the smart villas built to the scene originally envisaged in a lithograph by the architect.



H.E. Kendall Junior's lithograph of his proposed estate development, c.1872. (Brent Archives image 1776)

The HIA devotes just eight lines to assessing the historic significance of 1 Morland Gardens, before marking down its score to just 1 out of 3. The author of the booklet, who became an expert on the local history of Brent in his 17 years at our Museum and Archives, has made clear that this assessment is totally flawed. Its key statements are that Stonebridge Park 'was typical of the late-19th century suburban expansion of London,' and that '1 Morland Gardens is not a rare survival, but typical of the eclectic late-Victorian villas seen across Brent. Therefore, the historic significance of the building is considered to be lower than originally assessed, scoring 1/3.'



The entrance to Stonebridge Park from Hillside, c.1905. (Brent Archives online image 7914)

The 1876 development, was the first housing development in this part of Willesden, and gave its name to the Stonebridge Park area. It was built when Willesden's population was around 25,000, <u>before</u> the massive late-Victorian influx that saw most of the area's mainly working-class housing constructed, and the population rise to 114,000 by 1901. Added to this, 1 and 2 Morland Gardens are the only two surviving Italianate-style villas in Brent, so they <u>are</u> rare survivals. Any change to the existing historic significance score should be up to 3/3, not down to 1/3.



1 and 2 Morland Gardens from Hillside, February 2020.

The other significance criteria that the HIA seeks to mark the building down on is its authenticity. Because it ceased to be a private house 100 years ago, and has undergone internal alterations several times since then, Lichfields argue that the building is 'much altered', and therefore only worth 1/3. But the alterations had already been taken into account when Brent scored it 2 out of 3. It is the authentic Victorian outside appearance of the villa, in its setting with the similarly styled 2 Morland Gardens, which has hardly changed since they were built, which makes them so valuable and significant. Just compare the two views above, taken 115 years apart!

If you agree that the Victorian villa at 1 Morland Gardens has a high significance, not a low one, and that it still has value to this and future generations, then I hope you will help to persuade Brent Council that it should not be demolished. The planning application, 20/0345, is open for public consultation again, and you can submit your comments (hopefully objecting to the plans to demolish "Altamira") on the <u>planning website</u>.

Significance **is** significant. We can try to ensure that the true significance of this building is what decides the planning application, not the false appraisal of it presented in the Heritage Impact Assessment!

Philip Grant.