

Protecting theatres for everyone



Ref.: TC

11 May 2020

Planning and Regeneration
Brent Civic Centre
Engineers Way
Wembley
Middlesex
HA9 0FJ

By e-mail: Neil.Quinn@brent.gov.uk

Applications: 20/1163 & 20/1164

Site: 1 Burnt Oak Broadway, Edgware, HA8 5LD

Proposal: Partial demolition, restoration and extension of former bingo hall (Use Class D2) to create a seven storey building to provide co-working space and 127 purpose-built shared living units (Use Class Sui Generis), café (Use Class A3) with ancillary facilities and associated shared amenity space, landscaping, cycle and disabled parking; &

Listed building consent for partial demolition, restoration and extension of Grade II listed bingo hall (Use Class D2) to create a seven storey building to provide co-working space and 127 purpose-built shared living units (Use Class Sui Generis), café (Use Class A3) with ancillary facilities and associated shared amenity space, landscaping, cycle and disabled parking (REVISED DESCRIPTION).

Remit:

The Theatres Trust is the national advisory public body for theatres. We were established through the Theatres Trust Act 1976 'to promote the better protection of theatres' and provide statutory planning advice on theatre buildings and theatre use in England through The Town and Country Planning (Development Management Procedure) (England) Order 2015, requiring the Trust to be consulted by local authorities on planning applications which include 'development involving any land on which there is a theatre'.

Comment:

Thank you for consulting the Trust regarding this application for planning permission and listed building consent at this site, formerly the Savoy and more recently Mecca Bingo. The proposal seeks partial demolition and significant alteration to facilitate the change of use from D2 to Sui Generis co-working and shared living units along with ancillary café and supporting facilities. We note this site is included on Historic England's Heritage at Risk register and the Cinema Theatre Association's list of Cinemas at Risk.

Theatres Trust

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Chair Tim Eyles Director Jon Morgan

Trustees Richard Baldwin, David Blyth, Pam Bone, Paul Cartwright, Paddy Dillon, David Ian, Richard Johnston, Gary Kemp, Simon Ricketts, Truda Spruyt, Anna Stapleton

The National Advisory Public Body for Theatres

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The site is a Grade II listed cultural and heritage asset, opening originally as the Savoy in 1936. It was designed by prominent cinema architect George Coles in an Art Deco style. Historic England describe it as “an impressive cinema with all of its internal Moderne fittings intact”, although acknowledge it is in a declining state. The listing description assesses it as being a “good example of a relatively unaltered large suburban neighbourhood super cinema of the 1930s”. It is a distinctive feature of the local townscape and specifically referenced as a listed building of note locally within the Regulation 19 Draft Brent Local Plan which has been submitted for inspection. It was equipped with a stage and hosted occasional variety shows and some concerts, so while it falls within the remit of the Trust we acknowledge its actual use as a theatre was relatively limited. Cinema use ceased in 1961 after which it was converted to bingo use until closure in 2014. Like cinema and theatre, bingo is considered a community and cultural use which contributes towards the social and cultural wellbeing of local people and its users. Conversion between these functions is common, with bingo use tending to preserve much original character and preserve the possibility of return to performance use.

Where significant alteration is proposed which compromises or removes the future potential for performance use, as is the case with this proposal, notwithstanding any issues of design and heritage we would as a minimum seek robust demonstration and evidence the facility is no longer required by the local community for existing or alternative cultural/community use and appropriate marketing efforts have been exhausted without success. This position is reflected by local, London and national policy both adopted and proposed.

At a national level paragraph 92 of the NPPF (2019) seeks planning decisions to plan positively for community including cultural buildings and to guard against unnecessary loss. Within London, Policy 3.16.B of the London Plan (2016) states that, “Proposals which would result in a loss of social infrastructure in areas of defined need for that type of social infrastructure without realistic proposals for re-provision should be resisted.” Policy CP23 of the London Borough of Brent Core Strategy (2010) demonstrates additional need within Brent because it calls for new multi-functional community facilities at a rate of 370sqm per 1000 new population. Moreover the policy protects existing community and cultural facilities that support community participation. Section 11 of the Development Management Policies (2016) further articulates what is expected in practical terms to demonstrate lack of need; it requires consultation with the local community, vacancy and marketing data over a 24 month period and the potential to use the site for alternative community use.

It does not appear that sufficient evidence has been provided by the applicant to justify loss of the facility for continued or alternative community/cultural use in line with those policy requirements; for example the Heritage Statement states “a new use has not been able to be found” without substantiating that further. The Planning Statement makes no reference to any of the policies cited above managing community and cultural uses. The Design & Access Statement and Planning Statement both refer to pre-application advice accepting cinema use is no longer viable but this does not address whether the building could be used for other community or cultural purposes before looking to other uses.

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Further policy justification in support of retaining the building's existing character and function as a first priority before change of use and alteration comes from Policy 4.6.B which seeks planning decisions to address deficiencies in facilities and provide a cultural focus to foster more sustainable local communities. At a strategic level part A of that policy states the Mayor of London will, and boroughs should, support London's diverse range of arts and cultural enterprises and the cultural, social and economic benefits they offer to residents, workers and visitors. Support for culture and the arts has been clearly articulated by the current Mayor of London and this has manifested itself within emerging London Plan policies which have some weight in planning decisions. This includes Policy HC5.A which states plans and decisions should protect existing cultural venues and Policy HC6.B which protects and supports evening and night-time cultural venues.

Exploration of alternative community or cultural use is also pertinent in the context of more recent policy aspiration and direction for the site. The Regulation 19 Draft Brent Local Plan (2019) cites restoring the Savoy through its re-use as a priority and paragraph 5.3.38 states the Council consider its most appropriate use "is likely to be for community or leisure, but other uses compatible with its listed status will be considered. This will bring the building back into use without impacting its integrity or special interest". While we acknowledge the translation of "re-use" under opportunities can be open to interpretation, it is clear from subsequent text (not to mention policies cited above) that retained community or leisure use must be a first priority and even if those are demonstrated to be surplus to requirements this proposal undermines the building's integrity and special interest. While an existing adopted 2011 Site Allocation is still applicable (Site B/C4 3-5 Burnt Oak) this called for mixed use development across the wider site and it is clear that the residential element of 126 homes has already been exceeded; 53 units were envisaged for delivery in 2011/12 which matches the volume delivered within Cohen Court and 73 for 2013/14 which was delivered more recently (76 homes) within 3 Burnt Oak (Allied House). Therefore this proposal does not provide a basis by which to override normal policy requirements on loss of community/cultural use to address un-met residential need within the site allocation.

We are similarly concerned by the overall level of development proposed and the internal alteration and loss of fabric. Demolition plans show extensive areas of loss including substantial parts of the foyer, auditorium and front and back of house areas. While it is stated the walls and ceiling of the auditorium are to be restored and preserved with the stalls and stage re-purposed for co-working space visuals show the distinctive Art Deco colour scheme to be lost. The balconies will also be converted to meeting rooms and lecture space. The height and scale of the development can be considered to detract from the building's form and character as a heritage asset. It is stated within paragraph 5.15 of the Heritage Statement that "cinema buildings are notoriously difficult to repurpose due to the inherent nature of large, naturally unlit, internal auditoria being suited to a very small number of uses", and as such this necessitates demolition of parts of the building to extend it to allow for the purposes proposed. However, this is on the premise of other compatible uses being discounted and there is no objective

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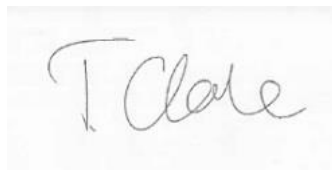
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assessment or evidence as noted above of continued community or cultural use being unviable or no longer required, and there is no analysis of alternative options. Paragraph 194 of the NPPF (2019) states that harm to the significance of designated heritage assets (including from alteration) should require clear and convincing justification. This is furthered by Policy DMP7.b seeks provision of detailed analysis and justification. Considering paragraph 196 of the NPPF, overall we do not consider the proposal offers sufficient public benefit to justify the level of harm and there is no evidence the proposed uses represent the optimal viable use.

In conclusion we object to this proposal on the basis of landuse, level of harm to a designated heritage asset and design. This is because the applicant has failed to robustly demonstrate the site is no longer required for its existing use or alternative community or cultural use in conflict with policy and emerging site allocation brief, and the proposal would undermine the character and significance of this building as a heritage asset due to its scale, poorly corresponding extension and significant alteration resulting in the loss and harm of historic fabric and character. While we appreciate the building and its features of significance are potentially in a deteriorating condition, this cannot on its own be sufficient justification for the level of alteration and harm proposed. We therefore recommend the refusal of planning permission and listed building consent.

Please contact us if we may be of further assistance or should you wish to discuss these comments further.



Tom Clarke MRTPI
National Planning Adviser

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