



### Planning Committee Map

Site address: Bowling Club and Collins Lodge, King Edward VII Park, Park Lane, Wembley

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This map is indicative only.

**RECEIVED:** 29 October, 2014

**WARD:** Wembley Central

**PLANNING AREA:** Wembley Consultative Forum

**LOCATION:** Bowling Club and Collins Lodge, King Edward VII Park, Park Lane, Wembley

**PROPOSAL:** Change of use of the bowling pavillion and adjoining land (Use class D2) into a primary school (Use class D1) also including the erection of a single storey classroom block, and part change of use of the land adjoining Collins Lodge (Use class C3) into parkland (Use class D2)

**APPLICANT:** London Welsh School

**CONTACT:** Mr Gywn Richards

**PLAN NO'S:**  
Refer to Condition 2

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**Introduction:**

1. The application is reported to Committee under the provisions of the Planning Code of Practice following the resolution at the meeting of the Planning Committee on 13th January 2015 to defer the application. The application was deferred for wider consultation and consideration of alternative sites within the park for land-swap. Both of these aspects are discussed below:

Wider Consultation

2. Consultation letters (49 by email, 357 by post) were sent on 27 January 2015 to the following addresses:

- 33 to 93 (odd) and 42 to 94 (even) Castleton Avenue
- 1 to 26 Keswick Gardens
- 3 to 71 Kingsway (odd) and 6 to 48 Kingsway (even)
- 1 to 12 Park Court
- Park Lane Methodist Church
- Park Lane Primary School
- 24 to 36 (even) and 65 to 199 (odd) Park Lane
- 1 to 41 Princes Court
- 60 to 88 (even) and 97 to 145 (odd) St Johns Road
- 19 to 27 (odd) and 28 to 56 (even) The Dene

3. Sixteen further letters of objection (three from residents who previously commented) and correspondence from the South Meadows Residents Association have been received during the course of the new consultation, raising the following points:

1. Adversely impact on amenity of nearby residential properties as a result of noise, disturbance, overlooking, loss of privacy, loss of views, lighting and CCTV
2. Increase risk of crime to nearby residential properties
3. Unsuitable location for school due to its location off a footpath and in close proximity to residential properties
4. No parking provision for school. Area already experiences parking problems with Park Lane Primary School and the Welsh School will add to further congestion
5. Loss of trees and adversely impact on natural wildlife and habitat
6. School not providing additional free school places and does not just serve Brent residents
7. Loss of community facility and parkland
8. Limited number of residents consulted
9. Proposal does not demonstrate compliance with paragraph 74 of the NPPF
10. Interest from members of the public in reopening the bowls club/community hub

11. If the school becomes a free school, the DfES can claim the land for educational purposes and build on it.

4. An objection has been received from Wembley Crime Prevention. They are a registered charity which support community based initiatives and projects principally with the objective to assist and defer young people away from crime through motivation into activities that work towards changing their perceptions on life through positive support and mentoring. They commented that the proposal could potentially provide cause for concern with crime. This is because the school will become regular users of this park in the earlier darkened seasonal hours, and that there have been reports of antisocial behaviour in the park.

5. Sport England have also provided further comments stating the following "Sport England is aware that local groups have shown an interest in reinstating the bowls club and former pavilion. Sport England would expect any approach made by local groups to continue using the facilities for their original sporting purpose, or some other sporting purpose to be given due consideration. Should there be a community need for the facility to remain in sporting (bowling) use, then paragraph 74 of the NPPF would suggest it be retained as such".

6. Points 1 to 7 have been previously raised and discussed within the main committee report. Points 8 to 11 and the comments provided by Wembley Crime Prevention and Sport England are discussed below:

7. One additional letter of support has also been received on the grounds that a new school that provides bilingual education will promote diversity in the Wembley area.

#### *Limited number of residents consulted*

8. The application has been deferred to allow for wider consultation with properties that surround the Park. A list of the properties that were consulted are listed above.

*If the school becomes a free school, the DfES can claim the land for educational purposes and build on it.*

9. The application site only relates to the bowling green pavilion and immediate surrounding land together with the Lodge House within the Park. The remainder of the Park including the bowling green will remain as public open space falling within use class D2. Any change of use or buildings for education purposes within the open space will require the benefit of planning permission, and assessed in accordance with planning policies.

#### *Response to representations received by Wembley Crime Prevention*

10. Concerns have been raised regarding the safety of the pupils of the school using the park. Reference has been made to incidents, including an individual loitering in the park climbing up trees seeking the opportunity to look upon residential households. In response, the school is proposed to operate during the opening hours of the park (0800 to 1600 Mondays to Fridays) and children are likely to be supervised or accompanied by an adult. It is not clear how the safety risks will be more significant than for other park users.

#### Consideration of alternative sites within the park for land-swap

11. A review of alternative sites within the park for the land swap has been undertaken. This review concludes that there are no alternative sites within the park, other than the Lodge (use class C3), which can be used for the land swap. The site adjacent to the Lodge is allocated within the agreement with Veolia as a depot site and the remainder of the park is defined as open space falling within use Class D2.

12. It is considered that the opening up of the land around the Lodge does have amenity value for use by the public. Although it is on a sloped area, it is well drained and can be used as a sitting/recreational area, providing views across the park and wider area. Sports and Parks Service have also advised that they are keen to use the Lodge as a cafe in the future with toilet facilities. There are existing examples of where this has taken place within Brent, including Roundwood Park. Any forthcoming proposal to change the use of the Lodge into a cafe will be subject to a separate planning application.

#### Proposal does not demonstrate compliance with paragraph 74 of the NPPF and expression of interest in reopening the bowls club

13. Paragraph 74 of the NPPF states the following:

*Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:*

- *an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- *the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- *the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.*

14. This application only relates to the former Bowling Green Pavilion and immediate surrounding land, and not the Bowling Green itself which will remain as open space. The former bowling green and pavilion is separated from the rest of the park by a hedge and fence. The bowling green pavilion currently has limited changing room space. Officers in Sports and Parks have advised that it is located too far away from either the sports pitches, tennis courts, MUGA or outdoor gym to provide changing facilities for these sports. The additional supporting statement, produced by the Welsh School in conjunction with Brent's Property and Projects, and Sports and Parks Service, has provided a map confirming the location of sporting facilities within the park and the existing changing rooms/pavilion building located centrally within the park. This building provides seven changing rooms and a kitchenette/tea room and looks directly onto the sport pitches. This pavilion building is ageing, and officers in Sports and Parks have advised that they will be applying for external funding together with Section 106 monies in 2016/17 will fund new changing rooms/pavilion in the same location as the existing building.

*Closure of the existing bowling club within King Edward VII Park, alternative bowling clubs within the Borough and future use of the former bowling green*

15. The former bowls pavilion and green at King Edward VII Park was the home of Wembley Bowl's club from 1919 with the club holding a full fixture calendar during the 2nd World War. The members aimed to maintain the club until 2019 however due to the lack of players the club was unable to sustain itself and closed at the end of the 2013 season with only 6 male and 4 female members. Since the bowls club closed at the end of the 2013 season, the green has not been maintained as a bowling green and will require substantial work at a significant cost to bring the green back to the standard required of a lawn bowls green. In recent years, only one green was used and the second green is no longer suitable as a bowling green.

16. There are four outdoor and one indoor bowls clubs in the Borough and all except one have a falling membership and are always keen to attract new members to ensure the club can sustain itself. The outdoor clubs play from April to September and the indoor one all year round. They Clubs are located around the Borough with the outdoor clubs being in different parks. Their distance by car from King Edward VII is:

- Preston Park - approx 1.6 miles
- Eton Grove park - approx. 3.3 miles
- Woodcock Park - approx. 2.5 miles
- Roundwood Park - approx. 3.4 miles
- Century Indoor bowls club off Logan Road - just over 1 mile.

17. The former bowling green pavilion cannot currently be accessed as public open space as it is enclosed by a fence and hedge. Sports and Parks have advised that they are applying for S106 monies (available from April 2015 if granted) to engage a landscape architect to prepare designs that will open up the bowling green land and incorporate it into the main park, allowing it to be more accessible as public open space. The anticipated timescale of the project will be until Spring 2016.

*Expression of interest in reopening the bowls club & community use*

18. The Council has received a proposal by the Friends of King Eddie's Park Group and the Princes Court & Keswick Garden Residents Association, wishing to reopen the bowling club with community use and a separate enquiry relating to opening the building for community use. Limited information has been provided regarding these proposals.

19. The proposal to reopen as a bowls club sets out that approximately 30 people have expressed an interest in bowls but the submission does not confirm that there is commitment to an ongoing annual membership. Sports and Parks have confirmed that due to their decreasing membership levels, those existing established bowls clubs are heavily subsidised with the clubs paying only £2,300 per annum towards the grounds

maintenance costs of the bowling green and for use of the pavilion. The Council needs to reduce the subsidy levels but is aware that should it do so with the existing clubs, the clubs would fold. If a new club were to be established, the Council could not be in a position to subsidise them to the same degree and would be looking to lease the pavilion to any new clubs on a full repairing lease. A club would then be responsible for paying for their utility consumption, insurance, legionella testing etc. Once the green has been brought up to standard (funded by a new club), the Council's public realm contractors could continue to undertake the main grounds maintenance functions on the bowling green at a cost of £2,300 per green or alternatively a new club could decide to undertake all the grounds maintenance themselves. The new club would also have to 'fit out' the pavilion with furniture etc as well as purchase necessary equipment.

19. The proposal states that they have approximately 30 members to date which would mean that as a minimum they would need to pay £76 per person per annum just to cover the contribution towards the maintenance of a single bowling green once the green is up to standard. The proposal was not supported by a financial analysis of the likely costs or a costed business plan and officers in Sports and Parks service have expressed great concern that this proposal for a club is not sustainable in the long run and there is a preference that if there is such demand for bowls that those interested parties should join one of the existing bowls clubs in the Borough to help them sustain their membership levels.

20. Any proposal for the use of the former bowling green pavilion and associated land as a community use that falls within use class D1 will be subject to planning permission, and assessed in accordance with national and local planning policies; this application proposal falls within use class D1. Property and Projects department advise that the proposed use of the building by the school has arisen in response to a request for assistance with relocating in view of the Council's proposals including the current Welsh School site in Stonebridge. They are developing a Community Asset Strategy to assist in responding to requests by other groups for community or other space.

21. Sports and Parks consider that the former bowling club pavilion is surplus to requirements as there is an alternative pavilion building within the park that better serves the sport pitches. The proposal for the reopening of the bowling club has been considered by officers in Sports and Parks Service which have taken the view that the proposal is not considered to be a long term sustainable proposition and that they would far rather see these people supporting an existing club then try to establish a new one. The proposal is therefore considered to not be contrary to paragraph 74 of the NPPF.

**Recommendation : Remains approval, for the reasons and recommended conditions set out in the original committee report and paragraphs 11 to 21 above.**

The main committee report and supplementary is attached below.

### **Planning Committee Report**

#### **RECOMMENDATION**

Grant Consent subject to conditions as set out after paragraph 38 of this committee report.

#### **CIL DETAILS**

Brent's CIL came into force on 1 July 2013. A charging schedule has been produced that sets out the differential rates of CIL to be determined by the land use of a proposed development. This application relates to an education use (use class D1) and has zero charge (£0).

The Mayor's CIL came into force on 1 April 2012. It also has a charging schedule of £35 per sqm for applicable floorspace in Brent. Once again as the application relates to an education use (use class D1) it has a zero charge (£0).

#### **CIL Liable?**

Yes/No: No

#### **EXISTING**

The application relates to two parcels of land located within King Edward VII Park. These are outlined in red on the site plan submitted with the application. The first of these parcels of land is the Bowling Pavilion located on the southern side of the park, adjacent to residential rear gardens on Princes Court and Keswick Gardens. The second parcel of land is land within the curtilage of Collins Lodge. The Lodge is located at the south eastern end of the park, close to the entrance from Park Lane.

#### **DEVELOPMENT SCHEDULE**

The table(s) below indicate the existing and proposed uses at the site and their respective floorspace and a breakdown of any dwellings proposed at the site.

### **Floorspace Breakdown**

<b>Primary Use</b>	<b>Existing</b>	<b>Retained</b>	<b>Lost</b>	<b>New</b>	<b>Net Gain</b>
assembly and leisure	77	0	77	0	0
non-residential institutions	0	77	-77	58	135

### **TOTALS in sqm**

<b>Totals</b>	<b>Existing</b>	<b>Retained</b>	<b>Lost</b>	<b>New</b>	<b>Net gain</b>
	77	77	0	58	135

### **PROPOSAL**

Change of use of the bowling pavillion and adjoining land (Use class D2) into a primary school (Use class D1) also including the erection of a single storey classroom block, and part change of use of the land adjoining Collins Lodge (Use class C3) into parkland (Use class D2)

### **HISTORY**

**09/1684:** Full Planning Permission sought for demolition of existing shed and toilet block and erection of new toilet block towards the west boundary of the site - Granted, 25/08/2009.

### **POLICY CONSIDERATIONS**

National Planning Policy Framework 2012 (NPPF)

Paragraph 72 of 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, and requires Local Planning Authorities to take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education.

Paragraph 74 of the NPPF

The London Plan 2011

Policy 3.18: Education Facilities

Policy 7.18: Protecting Local Open Space and Addressing Local Deficiency

Policy 7.21: Trees and Woodlands

Brent's Core Strategy 2010

CP18 Protection and enhancement of Open Space, Sports & Biodiversity

Brent's UDP 2004

BE9: Architectural Quality

CF7 New Schools

TRN22 Parking Standards - Non Residential Developments

Supplementary Planning Guidance

SPG17 "Design Guide for New Development"

### **CONSULTATION**

**Consultation Period: 04/11/2014 - 25/11/2014**

**Site Notice: 14/11/2014 - 05/12/2014**

21 neighbours consulted - three objections received on the following grounds:

- Increase in noise levels especially when pupils play outside, which is against the Human Rights Act and NPPF
- Adversely impact on tranquil character of Kings Edward VII Park
- Parking problems already exist with parents for nearby primary school parking in Princes Close. The new school will make parking congestion even worse.
- Loss of trees and greenery
- Loss of light to and outlook from neighbouring properties and rear gardens on Princes Close.
- Loss of open space and fails to comply with paragraph 74 of the NPPF and Brent's Core Strategy 2010
- Alternative sites should have been considered for the relocation of the school

Wembley Central Ward Councillors - no comments received.

Preston Ward Councillors - no comments received.

Tokynton Ward Councillors - no comments received.

### Internal Consultations

Transportation - no objections raised subject to a condition being secured for a School Travel Plan to be provided achieving a PASS rating.

Environmental Health - no objections raised. Due to the small scale size of the school no additional information or environmental health related planning conditions are required.

Landscape - no objections raised subject to tree protection measures being secured and a landscape buffer along the boundary with Princes Court with appropriate species - see remarks section below.

Parks Services - no objections raised. Further details are discussed in remarks section below.

## **REMARKS**

### Introduction

1. This application relates to the change of use of the bowling pavilion and adjoining land (Use class D2) into a primary school (Use class D1) together with the erection of a single storey classroom block. The application also includes a land swap with part change of use of the land adjoining Collins Lodge (Use class C3) into parkland (Use class D2), to re-provide accessible public open space. The land swap area is 555sqm which is of the same area as the bowling pavilion and adjoining land.

### Relocation of the London Welsh School

2. The London Welsh School (Ysgol Gymraeg Llundain) is a primary school which offers Welsh language based education for children aged 4 to 11. It accommodates 20 to 40 pupils, and currently has 30 pupils. The school has been based in Brent since 1958 where it was first established in Willesden. The school has since relocated to buildings in the grounds of Stonebridge Primary School over 10 years ago, where it is currently operating from. However, to facilitate the proposed expansion of Stonebridge Primary School, the school is required to vacate its current site by summer 2015. The London Welsh School is therefore seeking new accommodation in Brent to meet the needs of its pupils.

3. Following on from the London Welsh School being informed that they are required to vacate their current premises in September 2014, the school has looked at a number of possible relocation options. As part of the supporting information for this application, a list of alternative sites for consideration has been provided. Over 100 alternative sites and buildings have been considered by the School's Charity Board and a "Plan B Working Group" of parents. There were four educational based criteria to assist in narrowing down the search which are set out below:

- 140 sq m of internal space
- Flexible space to enable two or three spaces to facilitate two class teaching
- 400sqm of external play area
- D1 use (or if Planning advice suggests such a use is feasible)

- In North West, North or West London

4. All of the sites listed in the background information (almost all within the same D1 Use Class as a School Use) were dismissed as un-viable, un-realistic or un-affordable after a comprehensive assessment either based on a visit to the site, advice from agents, vendors or planning authorities. The main reasons for these properties being unsuitable were :

- unaffordable for the school which is a Registered Charity with very limited funds ;
- unsuitability of the buildings to being converted to a two class primary school to comply with basic educational requirements ;
- no external play area, again to comply with basic educational requirements ;
- Being too far from the school families and the geographical focus of the Welsh speaking community in terms of daily travelling and a sustainable future for the School
- Restrictive use, tenancy, planning or listed building issues
- Inappropriate location for a School, for example in an industrial park, traffic gyratory etc.
- Premises already rented for periods which makes block booking for school hours unfeasible

5. The bowling pavilion at King Edward VII Park was considered a good location of the relocation of the school as the accommodation can be readily converted , and is within short distance of pupils who live in Brent or Ealing.

#### Education Need for reproviding the London Welsh School

6. The Welsh language was once widely spoken as a majority language in Wales. However in the nineteenth century the language experienced a steep decline. By 1911 Census it had become the minority language in Wales and the rapid decline in the number of speakers continued through the Twentieth century. Today, only 16% of the population of Wales are fluent in Welsh (around 320,000 people). The census of 2011 showed a continued decline.

7. The long term future of the Welsh language is under significant threat, with UNESCO classifying Welsh as "Vulnerable" in its list of Endangered World languages. The decline in such minority languages is of concern to the European Union and the Council of Europe's Charter for Regional or Minority Languages if aimed at protection of regional and minority languages.

8. The London Welsh School is the only Welsh speaking school outside of Wales apart from Ysgol yr Hendre in Trelew in Patagonia, Argentina. The re-provision of the school at the bowling pavilion site will allow the continued long term future of the London Welsh School, meeting the needs of the Welsh speaking community in Brent.

#### Loss of the bowling pavilion

9. The bowls clubs that used the pavilion and bowling green disbanded at the end of the summer 2013 as they had less than 8 members, all ageing, and it was not possible for them to continue. Bowls generally is not attracting the numbers that it used to, being a game predominantly attracting older people. Most bowls clubs in London have declining memberships. There has been no interest in use of the bowling pavilion by other groups as the sports teams that use the pitches have access to the changing rooms located in the centre of the park. The Sports and Parks Service would not want to have a building in the park that becomes derelict through lack of use.

10. The Sports and Parks Service have advised that there is no reason for the Council to maintain the bowling green given that it is not attracting a user group. It is the intention to maintain the former bowling green as a grassed area of public open space but not for any formal sports as the area is not large enough. It is noted that the park already has football pitches, tennis courts and a MUGA. However, as is the case with existing the pitches and courts, the Council is considering whether this area, or part of the area, could be booked by local groups such as Park Lane Primary School, nursery groups, the Welsh School. This would provide an additional external play area for the Welsh School to that as shown within the application site, possibly for around 1.5 to 2 hours a day. The feasibility of undertaking works to better incorporate the former bowling green with the existing public open space is being considered by the Head of Sports and Parks and it is anticipated that works would be funded in whole or in part from existing S106 reserves allocated for improving public open space, subject to feasibility and Member approval, in the next financial year. Such works are proposed to take place next financial year.

11. In light of the lack of demand for the bowling pavilion as described above, it is considered that the



relocation of the London Welsh School to the site is an appropriate use that will ensure the continued use of the pavilion building.

#### Replacement public open space at Collins Lodge

12. Policy CP18 of Brent's Core Strategy 2010 seeks to protect public open space. This is also reinforced in policy 7.18 of the London Plan 2011 and paragraph 74 of the NPPF. The change of use of the pavilion building and the adjacent land from parkland to a school, will result in the loss of public open space. The area to be lost is 555sqm. This application proposes a land swap with 555sqm of land within the curtilage of Collins Lodge to be opened up as public open space within the park. A lodge house is defined as a dwellinghouse (use class C3) and the new parkland falls within use class D2. The land swap ensures that the loss of public open space is reprovided elsewhere within the park so that there is not a net loss. This would need the objectives of policy CP18.

13. In terms of the future of The Lodge, it has become vacant and the Council will look to market the site for a use appropriate for its park location, possibly as a park café. This would be subject to a separate planning application in the future. Sports and Parks will look to remove the fence along the paths that separates the lodge from the rest of the park which will open up the area and bring this area back into the public open space.

#### Conversion of the pavilion together with the design and siting of new classroom block

14. The existing pavilion will be used for one of the classrooms for the London Welsh School. The pavilion building was built around 2000 as a result of the former pavilion being fire damaged (there is a building control record ref: BR/00/1230/1). No external alterations are proposed to the existing pavilion building.

15. The second classroom is proposed to be accommodated within a new classroom block which will be sited at the southern end of the site, along the boundary with Princes Court. The building will be a portakabin which measures around 14.5m wide by 3.9m deep. It will have a flat roof that is just over 3m high. The building is proposed to be clad in vertical timber cladding so that it is more in keeping with the park setting. Further details of external materials both for the walls and roof are recommended to be conditioned to any forthcoming consent.

16. Revised plans were submitted during the course of the application to relocate the new classroom block 4m away from the boundary with the residential rear gardens on Princes Court. This was required to reduce the impact upon the amenities of the residents on Princes Close, and allowing trees within the site to be retained together with a significant landscape buffer to be provided to screen the new classroom building from the residential rear gardens of properties on Princes Close. Further discussions on residential amenity and trees/landscaping is set out below.

17. Behind the pavilion building is an existing area of hard surfacing that will be used as a play area for the school.

#### Neighbouring amenity

18. As discussed above, the new classroom building has been resited further away from the boundary with the rear gardens of Princes Court to reduce the visual impact of the classroom building and allow a landscape buffer to be provided.

19. In terms of noise and disturbance, as the school is of a small scale (maximum 40 pupils), no objections have been raised by officers in Environmental Health nor have they recommended any environmental health related planning conditions. It is recommended that a condition is secured to restrict the maximum number of pupils attending the school to 40 pupils.

20. The new classroom block proposes small windows on the rear and side elevations. To ensure that there is not a loss of privacy or noise and disturbance from the new classroom building, it is recommended that a condition is secured for these windows to be obscured glazed and non opening. The existing pavilion has high level windows and a single door on the rear elevation. The play area will also be provided within the hard surfaced area to the rear of the existing pavilion. Taking into account the existing landscape screen along the Keswick Gardens boundary, the small scale use of the school and restriction hours of use as discussed above, the use of the pavilion as a school classroom together with play area to the rear is not considered to adversely impact on the amenities of nearby residential occupiers on Keswick Gardens or Princes Close. Given that the small scale of the building and the restricting in the hours of use, scale of the school use is

comparable with the use of the building as a pavilion.

21. The school is proposed to be open Mondays to Fridays 0800 to 1600 during school term times. Given the proximity of nearby residential gardens, it is recommended that a condition is secured to restrict the opening hours to that as set out above.

### Trees and landscaping

22. A tree survey has been provided. The Council's tree officer has visited the site and advised that the retention and removal of the trees/shrubs identified in the tree survey is acceptable. Trees to be retained include the Norway Maple, Holly and privet hedge along the boundary with Princes Court. They have requested for a tree protection plan to be conditioned to any forthcoming consent, that protects the roof of T1 and the existing hedge throughout the duration of the construction.

23. The new classroom building will be set in 4m from the boundary with residential gardens on Princes Court. To allow the new classroom building to be screened, a landscape buffer is proposed. A basis statement has been provided setting out the main principles and an indicative list of species. This includes a mixture of native hedging to include Hawthorn, Holly, Viburnum lantana (Wayfaring tree), Viburnum opulus (Guelder Rose) and Prunus spinosa (Blackthorn). These are to be planted as a double row of 90/120cm bare rooted plants approximately 5 per linear metre. If planting is to be carried out outside traditional planting time (October-March), container grown stock is required. The hedge is to be interspersed with a few native trees, perhaps every 4 metres but none beneath the overhang of the retained Norway Maple (T1). The native trees include Mountain Ash (Sorbus aucuparia) and Crab Apple (Malus domestica), planted as 10-12cm girth heavy standards. The indicative landscape scheme is considered acceptable as it will involve native species that will enhance the biodiversity of the site and provide an appropriate setting with the adjoining parkland.

24. A landscape management plan is also required to be provided with regards to the establishment and future maintenance of the hedgerow. This will include the mixed hedge as being maintained at a height of approximately 3 metres and that the hedge and trees are regularly watered throughout the growing season for the first two years following planting.

25. Full details of landscaping and a landscape management plan are recommended to be conditioned to any forthcoming consent.

### Transportation considerations

#### *Car parking - school use*

26. The parking allowance for the proposed D1 use, for the school, is given in standard PS12 of the UDP. The allowance for the school is 1 space per 5 workers and the maximum additional visitor student parking should be 20% of the employee parking with a minimum provision of 1 space. The proposed school will have 6 employees and therefore a total allowance of 2 spaces, including the visitor parking, is permitted.

27. The application proposes no off-street parking and the nearest surrounding streets do have on-street restrictions. However, there are nearby pay and display car parks and the site also has good access to public transport.

28. Consideration needs to be given to the impact of overspill parking, but with parking spaces unavailable along Park Lane and with the surrounding streets being located within a CPZ, there is little scope for vehicles to park on-street in the area. As such, it is considered that parents are likely to travel by public transport. The design and access statement states that most parents' car share with 10 vehicular journeys are made for drop off, at the current school in Stonebridge. It is noted that the site is accessible by public transport being PTAL 4 at the access to the park from St John's Road and PTAL 5 at the access to the park from Park Lane; the current Stonebridge Primary School is PTAL 2.

29. The application is not accompanied by a school travel plan however, the applicant has advised in their Design and Access Statement that they are willing to commit to a school travel plan. A Travel Plan would help to mitigate any impact this school may have on the local area, and it is thus recommended that a full Travel Plan be conditioned to any forthcoming consent.

30. In conclusion, the proposed school is relatively small and it is not envisaged that drop off and pick up times will be detrimental to highway and pedestrian safety due to the site being located away from the public highway, with no vehicular access into the park. Officers in Transportation have advised that In fact, this is

likely to encourage parents to travel by public transport or park the car and walk their child into school.

#### *Cycle parking*

31. 2 cycle parking spaces are proposed, which does comply with Policy PS16.

#### *Refuse facilities*

32. The school will have two 120 Litre lockable wheelie bins located concealed to the north of the Bowling pavilion. One for normal refuse and one for recyclables.

33. The applicant has advised that the refuse is placed in black bin bags within the school and placed for storage in the wheelie bins. At present, the parents have a rota system of removing the bin bags as however there may be scope to incorporate the refuse collection with the existing collection arrangement within the Park or with the nearby Park Lane Primary School. It is therefore recommended that further details of the management of refuse collection for the school is conditioned to any forthcoming consent.

#### *Change of use of part of Collins Lodge to Parkland*

34. Officers in Transportation have advised that as this area of land will remain ancillary to the park use and of a small scale, this is not of concern in transportation terms.

#### Response to objections raised

35. A summary of the objections raised and responses to these objections is set out in the table below:

<b>Objection raised</b>	<b>Response</b>
Increase in noise levels especially when pupils play outside, which is against the Human Rights Act and NPPF	The impact on neighbouring amenity in terms of noise and disturbance is discussed in paragraphs 18 to 21 above
Adversely impact on tranquil character of Kings Edward VII Park	The school will allow the continued use of the former bowling pavilion so that it does not remain vacant and fall into disrepair. The setting of the parkland will be retained and enhanced with new boundary landscaping
Parking problems already exist with parents for nearby primary school parking in Princes Close. The new school will make parking congestion even worse	Parking considerations are discussed in paragraphs 26 to 30 above
Loss of trees and greenery	This is discussed in paragraphs 22 to 25 above
Loss of light to and outlook from neighbouring properties and rear gardens on Princes Close.	The impact on neighbouring amenity in terms of the new classroom block is discussed in paragraphs 15 and 16 above
Loss of open space and fails to comply with paragraph 74 of the NPPF and Brent's Core Strategy 2010	This matter is discussed in paragraphs 12 and 13 above
Alternative sites should have been considered for the relocation of the school	The report makes reference to alternative sites being considered. This is discussed in paragraphs 2 to 5 above

#### Conclusions

36. In conclusion, it is considered that the change of use of the former bowling pavilion into the London Welsh School will ensure that this building does not become derelict, and is an appropriate use within the park. To ensure that there is no net loss of public open space, part of the curtilage of Collins Lodge will be opened up for public open space.

37. The school will have a maximum of 40 pupils. As such, due to the small scale operation of the school, it is not considered to adversely impact on the amenities of neighbouring occupiers or the local highway network. Suitably worded conditions will be secured to any forthcoming consent. The new classroom block has been resited to minimise the impact on neighbouring occupiers, with a landscape scheme to be conditioned to ensure that the parkland setting is maintained and enhanced.

38. Approval is accordingly recommended subject to the conditions as set out below.

### **Supplementary Report (presented after publication of the Planning Committee report)**

**Agenda Page Number: 5**

#### **Members Site Visit**

Members of the Planning Committee visited the site on Saturday 10 January 2015. The following clarification is provided:

#### ***Use of wider park (in particular former bowling green) by school***

As discussed in paragraph 10 within the main committee report, the former bowling green will still be managed by Brent's Sports and Parks Service with the intention to maintain the former bowling green as a grassed area of public open space. The Sports and Parks Service are considering whether this area, or part of the area, could be booked by local groups such as Park Lane Primary School, nursery groups, the Welsh School. This would provide an additional external play area for the Welsh School to that as shown within the application site, possibly for around 1.5 to 2 hours a day. It should be noted that this application does not secure the use of any additional space as this would be subject to separate agreement with Sports and Parks Service. The application has been submitted on the basis that the site, as shown within the application submission, is of a sufficient size to accommodate the school.

#### ***Consultation***

Reference has been made to a letter of support being registered to the incorrect address. To clarify, a letter of support was received from 23 Toley Avenue. The letter was incorrectly registered to the wrong address 28 Princes Court when it received by the Council. This administrative error was rectified with appropriate letter sent to 23 Toley Avenue providing detail of the Planning Committee meeting and site visit. There has been no letter of support received from 28 Princes Court or letter purporting to be from this address.

A number of additional representations have been received since the main Planning Committee report was published. These are discussed in further detail below. When such representations are received by email/hard copies only the address is provided on the Council's website unlike when applications are submitted online; a copy of the email/letter can be viewed by the public if requested.

Concerns have also been raised with potential false addresses being provided by those wishing to support the planning application. Your officers can confirm that a total of 7 representations (of a total of 27) supporting the application have been received by residents in Brent, and that it has been verified that the names provided are connected to the relevant addresses. A number of the other representations have been received from outside the Borough. Whilst officers have not been able to verify these addresses, given the specialist nature of the Welsh School, it is not considered unrealistic that representations from outside the Borough could be provided. There is no evidence to suggest that false details have been provided.

#### ***Ownership of application site***

Property and Asset Management have confirmed that the site would remain in the ownership of the Council. Should the proposal be granted planning permission, an agreement would be put in place for the Welsh School would manage the buildings and a lease entered into (provisionally for 15 years).

#### ***Possible alternative site for land swap or school - Collins Lodge and land adjacent to Collins Lodge***

Collins Lodge was considered by the Welsh School when they were considering potential sites for the school. This site was discounted as it was not considered that the existing building would be appropriate to accommodate the school. Furthermore, given the prominent location in the park, it is considered unlikely that significant extensions or a further building would be appropriate.

With regard to the site adjacent to Collins Lodge, this is allocated within the agreement with Veolia as a depot site and as such is not available.

### ***Use of car park within King Edward VII Park***

Whilst the planning application does not propose any car parking, the Council's Sports and Parks Services have advised that they are willing in principle for the school to use the car park in the south west corner of the park accessed via St John's Road.. The school would need to be fully responsible for opening and closing the gates to the car park and that they remain closed when they are not in use and monitored / managed by the school even for the short period of time when they are open. This use/management of the car park could be secured as part of the School Travel Plan.

However, it should be noted that given the size and location of the proposed school, it is not considered to detrimentally impact on the surrounding road network and is acceptable without parking provided. This has been discussed in paragraphs 26 to 30 of the main Committee Report.

### **Additional representations received**

The following comments have been raised by Councillor Stopp:

- Queried whether providing the school on the green space is the best use of the land;

The school building will not be built on the "green space" and involves the reuse of the site of the bowling club which falls within a D2 use. The former bowling club green does not form part of the planning application and its future use is discussed in paragraphs 9 and 10 of the main committee report

- Concerns with increase in parking congestion and noise.

These matters have been considered as part of paragraphs of the main committee report. A condition is recommended to restrict the opening hours of the school.

- Loss of community facility

### *Further comments/objections*

9 further objections have been received. These are considered below:

- Loss of Welsh School consequence of expansion at Stonebridge Primary School – potential to explore sharing this site;

Each application is assessed on its individual merits. The justification for this proposal is set out in the Planning Committee report.

- Security fears over isolation of site – previous concern with nursery at Park Lane Primary School;

The building was previously in use and there is no reason to suggest that with normal supervision that this location for a school would give rise to security concerns. Sports and Parks Services have advised that, subject to Section 106 funding being agreed, a landscape design for the former bowling green could potentially include removing the fence but retaining some of the hedge so that the bowling green is brought back into the open space but that we do not lose the biodiversity value of the hedge.

- Potential disputes between Parks and school regarding maintenance of paths;

The lease agreement will cover the terms of the use/access between the Council and the leasee (the Welsh School)

- Arrangements for deliveries and waste impractical;

Arrangements regarding servicing are set out in the Committee Report (paragraphs 32 and 33)

- Emergency access;

In terms of emergency access, Sports and Parks Service have advised that there are three entrances the

park that would be used, principally using the entrance from Park Lane. All the gates have fire service locks on them so they can be opened by the fire service. The other entrances are off St Johns Road and The Dene. These are the entrances would be used if there was a fire in the changing rooms/pavilion for example.

- Yard next to Collins Lodge to be considered for land swap;

Please refer to comments provided above.

- Funding of school;

The justification for this proposal is set out in the Planning Committee report.

- Precedent for building on parks;

The justification for this proposal is set out in the Planning Committee.

- Area of park annexed by Park Lane School

Officers can advise that the school were initially given use of the area during curriculum time at a period in time when schools were being encouraged to use park space to encourage people to be active and make greater use of the outdoors. Originally it is believed that outside of curriculum time the area was supposed to be available for use by the public however it would seem that over time the school has developed exclusive use of this area.

- Use of the car park within the park and safety issues with general public access to the former bowling green

This application must be considered on its own merits. There is no reason to suggest that with normal supervision that the location would give rise to security concerns. The Council often have requests to use areas of open space that aren't formal pitches either for one off activity or on a regular basis. When the Council receives a request, a permit is issued as this would provide evidence to the wardens or anyone else that the group has the councils permission to use that space.

- School is not a charity but a Private Fee paying school and will not enhance the use of the park for local residents, if anything it will have a detrimental impact on regular users by fencing, CCTV, additional Lighting and people wishing to freely exercise their dogs.

Full details of lighting will be conditioned to any forthcoming consent. The former bowling green and pavilion is already fenced off from the main park, and this proposal is seeking to include the former bowling green as a grassed area for public open space. In terms of the management such as areas where dogs are permitted, this will be subject to the agreement of the Council's Parks Services.

**Sport England** - concerned regarding the ongoing use of the bowling green and clarity around its future status. Sport England advise they would support the ongoing use of the application site for sports and that strictly speaking, the application does not demonstrate full conformity with para 74 of the NPPF:

*Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:*

- *an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- *the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- *the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.*

Whilst Sport England does not dispute that the Bowls Club disbanded in 2013, this in itself does not mean that the site has no future purpose in serving the ongoing strategic needs of the bowls community. Sport England would advocate that the site remain in sporting use and that other sporting uses should be considered ahead of non sporting uses.

In response, the Sports and Parks service have confirmed the following:

*They supported Brent's bowls clubs for several years to try and help them extend their membership however across the board membership of bowls clubs is falling and aging. The fact that Brent has a considerably young population may be one of the factors as bowls tends to be an older persons sport.*

*King Edwards park already has the following sports facilities:*

- *Hard court tennis courts*
- *Outdoor gym*
- *Multi Use Games Area*
- *Football pitches and we are planning to provide a cricket wicket.*

*There are no other sports facilities that we could be provided on the bowling green site that aren't already provided within the park. Sports and Parks will not be maintaining the bowling green.*

*There is already a large block of changing rooms / pavilion within the park that serves the pitches and the longer term aim using external and capital money is to re-provide these facilities within the existing footprint so that they are more up to date and fit for purpose. The bowls pavilion does not have the facilities required for the pitches nor is it appropriately located to serve the other sports facilities in the park.*

### *Representations supporting the application*

27 representations have been received from individual properties supporting the application. These comments make reference to the importance of the Welsh School as an educational, cultural and community asset, and how the loss of the Welsh School operating in Brent would be a threat to the continued use of the Welsh language. The historical reference to the Welsh School operating in Brent since the 1950s was also raised.

The above matters have been referred to within the main committee report as part of paragraphs 6 to 8.

**Recommendation: Remain approval subject to conditions set out after paragraph 38 of the main Committee Report.**

**RECOMMENDATION:** Grant Consent

### **REASON FOR GRANTING**

(1) The proposed development is in general accordance with policies contained in the:-

National Planning Policy Framework  
London Plan 2011  
Brent Unitary Development Plan 2004  
Brent Core Strategy 2010  
Council's Supplementary Planning Guidance 17 "Design Guide for New Development"

Relevant policies in the Adopted Unitary Development Plan are those in the following chapters:-

Built Environment: in terms of the protection and enhancement of the environment  
Open Space and Recreation: to protect and enhance the provision of sports, leisure and nature conservation  
Community Facilities: in terms of meeting the demand for community services

### **CONDITIONS/REASONS:**

(1) The development to which this permission relates must be begun not later than the expiration of three years beginning on the date of this permission.

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

- (2) The development hereby permitted shall be carried out in accordance with the following approved drawing(s) and/or document(s):

Existing Floor plan of Bowling Club Pavilion  
Existing Elevation of Bowling Club Pavilion  
Location Plan for Bowling Club  
Location Plan for land adjoining Collins Lodge  
EX1  
PR1 Rev A  
PR2  
L1

Landscaping Scheme Overview  
Statement on Alternative Sites  
Supporting Statement

Reason: For the avoidance of doubt and in the interests of proper planning.

- (3) The windows on the rear and side elevations of the new classroom block shall be constructed with obscure glazing and non-opening and shall be permanently returned and maintained in that condition thereafter unless the prior written consent of the Local Planning Authority is obtained.

Reason: To minimise interference with the privacy of the adjoining occupiers.

- (4) The total number of pupils on site shall not exceed 40 unless an application is firstly submitted to and approved in writing by the Local Planning Authority.

Reason: In the interests of the amenities of nearby residential occupiers and in the interests of the local highway network.

- (5) The primary school shall only operate between the hours of 0800 to 1600 Mondays to Fridays.

Reason: In the interests of the amenities of nearby residential occupiers.

- (6) The cycle stands as shown on plan ref: PR1 Rev A shall be installed prior to first occupation of the primary school hereby approved, and thereafter permanently retained throughout the lifetime of the development, unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of providing adequate cycle parking facilities.

- (7) Details of materials for all external work for the new classroom block (including details of cladding to elevations, roofing material, window and doors materials) together with samples where appropriate, shall be submitted to and approved in writing by the Local Planning Authority before any work is commenced. The work shall be carried out in accordance with the approved details.

Reason: To ensure a satisfactory development which does not prejudice the amenity of the locality.

- (8) Prior to commencement of any works on site, a Tree Protection Plan showing the method of protecting the retained trees shown on plan L1 throughout the construction period shall be submitted to and approved in writing by the Local Planning Authority. The approved details shall thereafter be carried out in full accordance with the approved tree protection measures throughout the construction period.

Reason: In the interests of protecting trees of amenity value.

- (9) Prior to commencement of works on site, full details of landscaping within the site shall be



submitted to and approved in writing by the Local Planning Authority. Such details shall include:

- (a) full details of soft landscaping (including species, location, numbers and densities)
- (b) details of areas of hardstanding and pathways including hardstanding to be retained and any new or replacement hardstanding
- (c) details of any play equipment or external seating
- (c) details of any external lighting within the school site including any external lighting to be attached to the pavilion or new classroom block

Any trees and shrubs planted in accordance with the landscaping scheme which, within 5 years of planting are removed, dying, seriously damaged or become diseased shall be replaced in similar positions by trees and shrubs of similar species and size to those originally planted unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure a satisfactory standard of appearance and setting for the development and to ensure that the proposed development enhances the visual amenity of the locality in the interests of the amenities of the occupants of the development and to provide tree planting in pursuance of section 197 of the Town and Country Planning Act 1990.

- (10) Further details of the location/design of the refuse store and management of refuse collection from the school site shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of works on site, and thereafter fully implemented in accordance with the approved details.

Reason: In the interests of providing adequate refuse collection facilities.

- (11) Prior to the first occupation of the primary school hereby approved, a School Travel Plan of sufficient quality to score a PASS rating using TfL's ATTrBuTE programme, to incorporate targets for minimising car use, monitoring of those targets and associated measures to meet those targets, shall be submitted to and approved in writing by the Local Planning Authority and shall be fully implemented as approved and adhered to thereafter.

Reason: In the interests of reducing reliance on private motor vehicles.

- (12) Prior to occupation of the primary school the existing fence enclosing the park around the Collins Lodge shall be removed.

Reason: To ensure that there is no loss of accessible park to the public.

#### **INFORMATIVES:**

None Specified

#### **REFERENCE DOCUMENTS:**

The following extracts are some of the submitted plans. All submitted details can be viewed on the Council's website [www.brent.gov.uk](http://www.brent.gov.uk) by searching with the application reference.

Bowling Pavilion

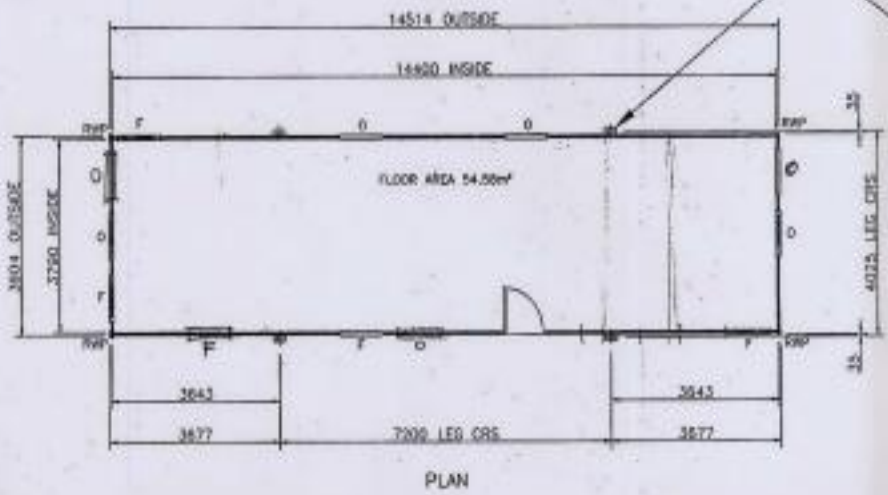
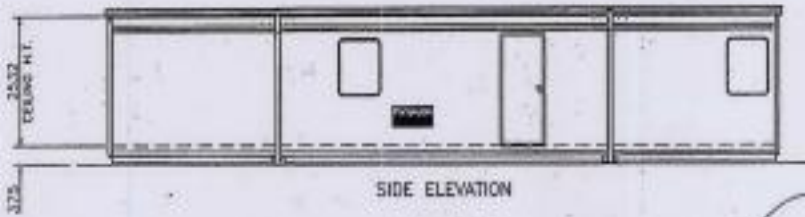
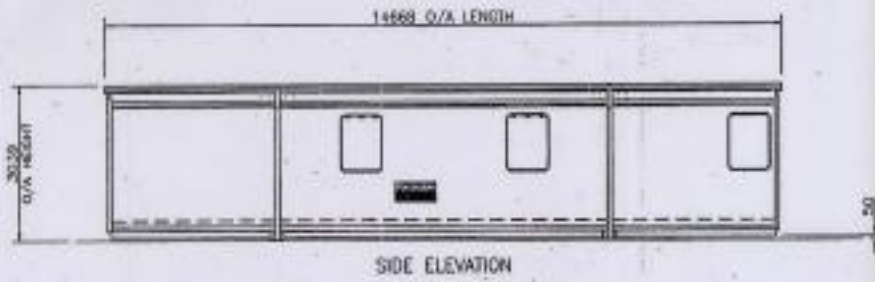
PROPOSED SITE PLAN  
Scale 1 : 100 at A3



Drawing Number PR1  
October 27, 2014



Drawing PR2 (October 27<sup>th</sup> 2014) : Bowling Green Pavilion, Ling Edward VII Park  
 Details of new Classroom Block (Not to Scale, Dimensions shown on drawing)  
 Portakabin Pullman Model PM484 (copyright "Portakabin") to be clad in vertical timber closeboard



Indicative image of proposed over-cladding of structure

Any person wishing to inspect the above papers should contact Victoria McDonagh, Planning and Regeneration, Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ, Tel. No. 020 8937 5337