



## Planning Committee

**Wednesday 11 February 2026 at 6.00 pm**

Conference Hall - Brent Civic Centre, Engineers Way,  
Wembley, HA9 0FJ

Please note this will be held as a physical meeting which all Committee members will be required to attend in person.

**The meeting will be open for the press and public to attend or alternatively can be followed via the live webcast. The link to follow proceedings via the live webcast is available [HERE](#)**

### Membership:

#### Members

Councillors:

Kelcher (Chair)  
S Butt (Vice-Chair)  
Ahmadi-Moghaddam  
Akram  
Begum  
Chappell  
Johnson  
J. Patel

#### Substitute Members

Councillors:

Agha, Bajwa, Dixon, Mahmood and 1 vacancy  
Councillors  
Hirani and Kansagra  
Councillors  
Ethapemi and Farah

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**Members' virtual briefing will take place at 12.00 noon.**

## **Notes for Members - Declarations of Interest:**

If a Member is aware they have a Disclosable Pecuniary Interest\* in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent and must leave the room without participating in discussion of the item.

If a Member is aware they have a Personal Interest\*\* in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent.

If the Personal Interest is also significant enough to affect your judgement of a public interest and either it affects a financial position or relates to a regulatory matter then after disclosing the interest to the meeting the Member must leave the room without participating in discussion of the item, except that they may first make representations, answer questions or give evidence relating to the matter, provided that the public are allowed to attend the meeting for those purposes.

### **\*Disclosable Pecuniary Interests:**

- (a) **Employment, etc.** - Any employment, office, trade, profession or vocation carried on for profit gain.
- (b) **Sponsorship** - Any payment or other financial benefit in respect of expenses in carrying out duties as a member, or of election; including from a trade union.
- (c) **Contracts** - Any current contract for goods, services or works, between the Councillors or their partner (or a body in which one has a beneficial interest) and the council.
- (d) **Land** - Any beneficial interest in land which is within the council's area.
- (e) **Licences** - Any licence to occupy land in the council's area for a month or longer.
- (f) **Corporate tenancies** - Any tenancy between the council and a body in which the Councillor or their partner have a beneficial interest.
- (g) **Securities** - Any beneficial interest in securities of a body which has a place of business or land in the council's area, if the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body or of any one class of its issued share capital.

### **\*\*Personal Interests:**

The business relates to or affects:

(a) Anybody of which you are a member or in a position of general control or management, and:

- To which you are appointed by the council;
- which exercises functions of a public nature;
- which is directed to charitable purposes;
- whose principal purposes include the influence of public opinion or policy (including a political party or trade union).

(b) The interests of a person from whom you have received gifts or hospitality of at least £50 as a member in the municipal year;

or

A decision in relation to that business might reasonably be regarded as affecting the well-being or financial position of:

- You yourself;
- a member of your family or your friend or any person with whom you have a close association or any person or body who is the subject of a registrable personal interest.

# Agenda

Introductions, if appropriate.

ITEM	WARD	PAGE
1. Apologies for absence		
2. Declarations of interests		
	Members are invited to declare at this stage of the meeting, the nature and existence of any relevant disclosable pecuniary or personal interests in the items on this agenda and to specify the item(s) to which they relate.	
3. Minutes of the previous meetings		
(a) Wednesday 12 November 2025		1 – 16
(b) Wednesday 10 December 2025		17 – 32

## APPLICATIONS FOR DECISION

4. 25/0041 - Little Trainers Playground and Hazel Road Community Centre, 26 Hazel Road and Harriet Tubman House, 28 Hazel Road, London, NW10 5PP	Queens Park	37 - 74
5. 25/3070 - North Eastern Lands (Plots NE04, NE05 and NE06) - Land bound by Engineers Way, to the south and Fulton Road to the North and East, Wembley	Wembley Park	75 - 106
6. 25/1029 - 7 Randall Avenue, London, NW2 7RL	Dollis Hill	107 - 136
7. Any Other Urgent Business		

Notice of items to be raised under this heading must be given in writing to the Deputy Director Democratic & Corporate Governance or their representative before the meeting in accordance with Standing Order 60.

**Date of the next meeting:** **Wednesday 11 March 2026**



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- The meeting room is accessible by lift and seats will be provided for members of the public. Alternatively, it will be possible to follow proceedings via the live webcast [HERE](#)

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## LONDON BOROUGH OF BRENT

### MINUTES OF THE PLANNING COMMITTEE

Held in the Conference Hall, Brent Civic Centre on Wednesday 10 September 2025 at 6.00 pm

PRESENT: Councillor Kelcher (Chair) and Councillor S Butt (Vice-Chair) and Councillors Akram, Begum, Dixon, Johnson and J Patel.

#### 1. Welcome and Apologies for absence

Apologies for absence were received from Councillor Chappell.

#### 2. Declarations of interests

In relation to Agenda Item 5: 25/0357 - 37 Lydford Road, London, NW2 5QN - all members of the Committee confirmed they had received an approach from the owner of the neighbouring property (as an objector) but had not engaged in discussion or sought to take any position on the application and therefore felt able to consider the application impartially and without any form of predetermination.

No other declarations of interest were made during the meeting.

#### 3. Minutes of the previous meeting

**RESOLVED** that the minutes of the previous meetings held on Monday 4 August 2025 be approved as a correct record of the meeting.

#### 4. 25/1355 - Argenta House, Argenta Way, London, NW10 0AZ

##### PROPOSAL

Redevelopment of the site to provide a building containing residential dwellings with commercial unit on ground floor, associated vehicular access, cycle parking spaces, refuse storage, amenity space, landscaping and associated works.

##### RECOMMENDATION

That the Committee resolve to GRANT planning permission subject to a Stage 2 referral to the GLA, the imposition of the conditions and informatives set out in the committee report and the completion of a S106 agreement capturing the obligations set out in the heads of terms outlined in the committee report.

James Mascall (Principal Planning Officer) introduced the report, advising members that the application sought full planning permission for the comprehensive redevelopment of the site to provide a part 27, part 30 storey building, comprising 180 residential dwellings (Use Class C3) and 17.8sqm of flexible commercial space (Use

Class E). The scheme would also include ancillary hard and soft landscaping, cycle parking, refuse storage and plant space.

Attention was also drawn to the supplementary report circulated in advance of the meeting, which outlined a number of minor amendments to the committee report, specifically in relation to the Stonebridge Park Station financial contribution wording which had been amended to allow for the contribution of £222,750 to be used towards improvements at Stonebridge Park Station, as well as for the Stonebridge Park Station Capacity Study. It was additionally noted that a revised Third Floor Plan had also been received which proposed an agreed quantum of long-stay bicycle parking in accordance with comments from Transport for London (TFL). The quantum of provision remained in line with policy T5 standards as set out within the remainder of the committee report. Furthermore, following additional feedback, an amendment would be made to S106 Heads of Terms associated with the application which would specifically require the open space financial contribution to be used towards improvements to and the maintenance of Brent River Park, which included Tokyngton Recreation Ground, Monks Park and St Raphaels Open Space. For clarity, it was confirmed that the location of Brent River Park was located within the vicinity of the development, ensuring that prospective residents would have convenient access to nearby facilities. This provision was intended to compensate for the absence of open space onsite. The recommendation remained to grant planning permission subject to a Stage 2 referral to the GLA, the imposition of the conditions and informatics set out in the committee report and the completion of a S106 agreement capturing the obligations detailed in the heads of terms outlined in the committee report.

The Chair thanked James Mascall for introducing the report. As there were no Committee questions raised at this point, the Chair then moved on to consider a request which had been received to speak on the application and invited Sandy Walker (who had registered to speak as the applicant's representative) to address the Committee in relation to the application, who highlighted the following points:

- It was noted that the scheme would provide 180 high-quality affordable homes, thereby addressing the significant demand for affordable housing across the borough. It was emphasised that every home within the development would be affordable, with almost half designated for social rent, representing the lowest cost housing available. The proposal included 88 new social rent homes, of which 40 would comprise three-bedroom units, thereby responding to the high need for family-sized accommodation in Brent. The representative further noted that this represented a substantial improvement on the previous scheme.
- It was additionally stated that the development would create new amenity green spaces and deliver enhancements to Wembley Brook, thereby improving accessibility and attractiveness for the local community. The scheme would provide 180 square metres of public open space at ground level and 121 square metres of flexible space at first floor level, designed to offer amenities for all age groups, particularly children, and to foster a strong sense of community and belonging. The representative confirmed that the proposal would deliver a significant biodiversity gain, enhancing local ecology and transforming Wembley Brook, achieving an uplift of 160% in watercourse units and an 11% gain in habitat units. In addition, the scheme would include a small flexible

space at ground floor level fronting onto the public realm, intended for use as a local coffee shop to activate the area and strengthen community cohesion.

- It was highlighted that the proposals would act as a catalyst for the regeneration of Stonebridge Park. The scheme had been designed to initiate the regeneration of this strategically important site within the borough. It was explained that the design would reflect and respond to both the existing and emerging context, significantly improving the sense of arrival opposite Stonebridge Park Station. It was felt that the proposals would enhance the public realm and contribute to the overall improvement of the Stonebridge Park neighbourhood.
- The applicant's representative concluded by noting that they had engaged extensively with officers and the local community over the preceding two years to develop a scheme that would deliver high-quality architecture, internal and external amenity space, much-needed affordable housing for Brent, and act as a catalyst for transformation within Stonebridge Park.

The Chair thanked Sandy Walker for addressing the Committee and then invited members to ask any questions they had in relation to the information presented, with the following being noted:

- As an initial query, the Chair requested clarification regarding the applicant's confidence in delivering the proposed development, given that the site had remained vacant for several years and considering potential viability issues. In response, the applicant's representative confirmed that both the applicant and their partners were fully committed to delivering the scheme. It was stated that grant funding was being utilised and that commencement on site was required early in 2026. The representative emphasised that the intention was to proceed as quickly as possible following the grant of planning permission.
- Members enquired how the applicant intended to minimise flood risk in Wembley Brook. In response, a member from the applicant's team, (Bob Davis, Landscape Architect) explained that extensive engagement had taken place with the Environment Agency, including several discussions. It was confirmed that the proposal involved breaking out the existing concrete channel and renaturalising the Brook to restore its natural form, thereby improving hydromorphology. It was advised that soft landscaping would be introduced and terraced to mitigate flooding. It was added that a consultant had been engaged to ensure that both landscape and flood management objectives were balanced. Alex Attwood (Flood Consultant, member from the applicant's team) further reported that a comprehensive Flood Risk Assessment had been prepared for the proposals and that extensive flood modelling had been undertaken. It was confirmed that the design ensured there would be no adverse impact on flood risk within the wider borough. It was explained that measures included the careful positioning of building columns within the floodplain and ensuring that water displacement did not occur. It was stated that the drainage strategy would reduce runoff rates, thereby preventing any increase in surface water flooding. It was acknowledged that issues had arisen during initial construction works on the site, where culvert blockages caused

increased flood risk. The Committee were assured that a robust Construction Management Plan would be implemented during future works to prevent such blockages and protect residents from flooding. Laura Jenkinson (Planning Consultant, member from the applicant's team) further added that the naturalisation of Wembley Brook would reduce the likelihood of flooding downstream and confirmed that the proposals would deliver a net benefit compared with both the existing site and the previous scheme.

- Details were sought on any communication which had taken place with the Alstom Traincare Centre, given its proximity to the site. In response, Stuart Davies (Transport Consultant, member from the applicant's team) explained that the proposed highway works extended up to and included the roundabout at the junction of Point Place and Argenta Way but did not extend beyond into the unadopted private road. It was confirmed that the applicant had limited influence over that road and that any informal parking behaviour would need to be managed by its owners. It was further stated that the proposed works at the roundabout would retain the existing bus stand and would necessitate changes to double yellow lines. The Committee were informed that a raised lay-by would be created on the north side of Argenta Way to serve the development, ensuring that the scheme's needs were met without reliance on the private road. Stuart Davies confirmed that he had not personally held discussions with the Alstom Traincare Centre.
- Following up, members questioned whether a consultation event had been held, how many people attended, and what feedback had been received. In response, Laura Jenkinson (Planning Consultant, member from the applicant's team) confirmed that the applicant had presented the proposals to the Committee Review Panel on two occasions and had also presented to the Design Review Panel. It was also reported that a public exhibition had been held and that meetings had taken place with ward councillors. While it was acknowledged that attendance at consultation events had been limited, it was confirmed that all engagement had been carried out in accordance with Brent's requirements. Members expressed a desire to ensure that local residents had been considered. In response, it was confirmed that meetings had been held with local residents prior to the public exhibition. It was also noted that several attendees had been directly affected by previous flooding, and the applicant had worked with them to demonstrate how the benefits of the scheme would mitigate future flood risk.
- With reference to the committee report, which noted that the development would include a flexible community space for children aged 0 to 4 years, and highlighted that the space could be multi-use, requiring a robust management plan, members stressed the importance of providing a concrete offer for residents, including a meet-and-greet space and facilities for private bookings such as birthday parties, particularly given the scale of the development and potential future schemes. In response, Tom Banfield (Architect, member from the applicant's team) confirmed that significant effort had been made to ensure the best possible offer for residents. It was stated that Clarion had a long-standing track record in managing buildings and would adopt the same approach for this development. The applicant's commitment to fostering a

sense of community was emphasised and it was confirmed that the space would be designed to accommodate bookings for events and other resident-led activities. The Committee were assured that a management plan would be implemented to maximise the use of the space and encourage community engagement.

- Members observed the shortfall in amenity space for children aged 0 to 4 years and highlighted the need for residents to have access to a community space within close proximity to the development. Members sought a commitment from the applicant to work with officers to identify a flexible solution that would meet both requirements. In response, Laura Jenkinson (Planning Consultant, member from the applicant's team) confirmed that Condition 26 of the draft planning permission required the submission of an Amenity and Play Space Management Plan. It was explained that this plan would address matters including hours of use, booking arrangements, and measures to ensure user access to the space. It was further noted that the site formed part of a wider location that included Wembley Point, where a scheme currently being developed provided a community facility comprising 878 square metres of non-residential floorspace. This facility included a community gym and other spaces intended for public use.
- Members then moved on to question the applicant's recruitment process, given the high levels of unemployment in Brent, and assurance was sought that local residents would have access to employment opportunities arising from the development. In response, Tom Banfield (Architect, member from the applicant's team) confirmed that the applicant had been working closely with officers and that obligations under Section 106 agreements required contractors to meet specific commitments to support local employment. It was additionally stated that these requirements would be incorporated into construction contracts to ensure that opportunities were made available to local people.
- As an additional issue, members enquired whether any consultation or communication had taken place with Transport for London regarding improvements to Stonebridge Park Station, including potential contributions towards step-free access or other upgrades. In response, Tom Banfield (Architect, member from the applicant's team) confirmed that negotiations had taken place with officers and that, as part of the Section 106 obligations, a defined contribution of approximately £220,000 had been secured for Stonebridge Park Station. It was further added that this contribution would also include funding for a capacity study.
- As a further issue highlighted, members questioned why the shared ownership model had been pursued, what other models had been considered, and requested feedback on the applicant's experience with shared ownership. In response, Tom Banfield (Architect, member from the applicant's team) explained that, as a housing association, the applicant managed and operated a significant number of shared ownership homes. It was stated that considerable effort had been made to ensure that the design and mix of homes within the scheme were appropriate, balancing variety with grant requirements

and deliverability. It was emphasised that the applicant was eager to deliver the scheme and provide affordable homes for the borough, and that these considerations had informed the approach throughout the process.

Jehan Weerasinghe (Corporate Director Neighbourhoods and Regeneration) noted that shared ownership continued to be recognised as an affordable housing product. It was confirmed that the Brent Local Plan did not preclude shared ownership and that, while some boroughs adopted different policy positions, shared ownership remained acceptable was consistent with Greater London Authority (GLA) guidelines.

The Chair thanked Sandy Walker and his team for responding to the Committee's queries and then moved on to offer the Committee the opportunity to ask the officers any remaining questions or points of clarity in relation to the application, with the following being noted:

- The Chair asked officers to provide their assessment of the quality of the architectural design and its contribution to the local townscape throughout the planning process. In response, Colin Leadbeatter (Development Management Area Manager) confirmed that the scheme had undergone both Design Review Panel and Quality Review Panel processes during the pre-application and application stages. It was noted that the proposal followed a previously consented scheme on the site with a similar footprint. It was also stated that the applicant had engaged extensively in pre-application discussions, which were reviewed through the Quality Review Panel (QRP) and Distribution Requirements Planning (DRP) processes. Both panels supported the general design principles of the building, as did the Placemaking Manager and Urban Design Officers within the planning department. It was explained that the building comprised two interlocking blocks connected through a central core and featured a rationalised, well-designed and articulated elevational treatment with a carefully considered materials palette. It was confirmed that officers considered the design to sit comfortably within its context and described it as exemplary in quality. It was noted that the building would form an attractive and well-designed gateway to this part of the borough. David Glover (Head of Planning and Development Services) further added that the development would deliver a range of new facilities to support both future residents and the existing community.
- The Chair noted the site's strategic location in terms of Public Transport Accessibility Level (PTAL) and proximity to the North Circular Road. It was questioned how the design had addressed potential air quality and noise issues arising from its location adjacent to one of the busiest roads in the borough. In response, James Mascall (Principal Planning Officer) confirmed that the application was accompanied by an Air Quality Assessment, which examined potential impacts from nitrogen dioxide and carbon dioxide. It was reported that, based on data from receptors, no air quality mitigation was required for residents. It was additionally explained that the extant consent had required mitigation for floors 3 to 6 due to nitrogen dioxide concerns based on 2016 emissions data. However, updated data indicated that nitrogen dioxide levels had reduced, likely due to decreased car usage, and therefore no mitigation

was necessary under the current proposal. Members were advised that a Noise and Vibration Assessment had also been submitted, which considered noise levels from the North Circular Road. The assessment identified that recommended internal noise levels of 35 decibels during the day and 30 decibels at night would not be met without mitigation. Consequently, specific glazing specifications were required to achieve compliance, and a condition would be imposed to ensure the development was undertaken in accordance with the assessment. Victoria McDonagh (Development Management Service Manager) further added that air quality outcomes were positive and that conditions had been secured to require a Construction Management Plan to mitigate emissions during the build phase.

- Members then moved on to focus on issues identified within paragraph 55 of the committee report and expressed concern regarding the disproportionately small entrance to the residential part of the building, asking whether improvements could be made. In response, Colin Leadbeatter (Development Management Area Manager) confirmed that this issue had been identified during the application process. It was reported that discussions with the applicant had resulted in an agreement to provide updated information on the entrance design during the discharge of conditions relating to materials. This would include details on how the entrance would be defined through materiality and colour treatments. Members were advised that, following further discussions, the wording of the condition would be tightened to specifically reference the entrance, ensuring that officers could review the detail when the condition was discharged.
- With respect to paragraph 165 of the committee report, views were sought from officers around the Healthy Streets approach. In response, Colin Leadbeatter (Development Management Area Manager) confirmed that the scheme incorporated a significant number of elements contributing to the provision of Healthy Streets. It was explained that, through the Section 106 agreement, a financial contribution had been secured for improvements to the cycle route CFR 23, which runs alongside the application site. It was additionally stated that the definition of the highways works contribution had been widened to allow additional funds to be allocated to Healthy Streets initiatives, should these be considered appropriate, particularly if a Controlled Parking Zone (CPZ) was not pursued.
- Members expressed concern regarding pressures on GP surgeries, schools and play areas, emphasising the need to ensure that additional facilities were provided and that existing services were not overburdened. In response, Victoria McDonagh (Development Management Service Manager) explained that when planning policies were developed through the Local Plan, an Infrastructure Delivery Plan was prepared in parallel. This plan assessed requirements for school places, medical facilities, community facilities and other infrastructure necessary to support the level of development envisaged. It was confirmed that officers worked closely with colleagues in the Education department to monitor school capacity and identify areas where new provision might be required, particularly within designated growth areas. An example of a new secondary school in the north of the borough by the name of North Brent

School was cited and it was noted that demand for school places varied across the borough with reductions in some areas. Members were advised that similar monitoring applied to medical facilities, referencing the inclusion of a medical facility within the Grand Union scheme. It was emphasised that infrastructure requirements were reviewed throughout the lifetime of the Local Plan. It was further explained that schemes contributed to strategic infrastructure through the Community Infrastructure Levy (SCIL), which was allocated through a separate process. While development management did not directly control this allocation, funds generated through SCIL supported infrastructure delivery across the borough. David Glover (Head of Planning and Development Services) further noted that £200,000 had been secured through Section 106 contributions specifically for play space as part of the scheme.

- Members questioned whether officers were satisfied with the proposed arrangements for waste and recycling within the residential blocks. In response, John Fletcher (Team Leader – Development Control, Transport Planning) acknowledged that the site was constrained, particularly at ground floor level. It was explained that, as with previous proposals, agreement had been reached for a bi-weekly collection service, which would reduce the amount of storage space required for waste on the ground floor. While the arrangement would require effective management and rotation of bins, it was confirmed that officers were satisfied that the proposals were workable with the additional contribution for more frequent collections. Colin Leadbeatter (Development Management Area Manager) further stated that the draft Section 106 agreement included a schedule requiring the submission, approval and implementation of a Waste Management Plan. It was confirmed that this would create a legal obligation for the applicant and that the Development Control Transport Planning Team would work with planning officers to discharge the condition.
- Clarification was sought around how issues relating to daylight and sunlight would be mitigated. In response, James Mascall (Principal Planning Officer) reported that the application was accompanied by a Daylight and Sunlight Assessment. It was noted that the development was located slightly further from Tokyngton Avenue than might typically be expected for schemes of this nature. It was confirmed that 11 properties had been assessed, with 10 meeting the Building Research Establishment guidance for daylight and sunlight. One property failed due to the presence of an external canopy in its rear garden, which had already significantly reduced daylight and sunlight levels. It was explained that, because the existing values were very low, the percentage change appeared large, although the actual impact was minimal. Colin Leadbeatter (Development Management Area Manager) further added that the site already benefited from an extant planning permission for a tall building, which was a material consideration. It was stated that the additional impact beyond what had previously been consented was extremely marginal. It was emphasised that, in weighing the planning balance, the minimal harm to one property was substantially outweighed by the delivery of a 100% affordable housing scheme, including a significant proportion of family-sized homes. It was confirmed that the relationship with adjacent developments had also been assessed and considered acceptable.

- It was questioned whether officers were satisfied with the flood risk mitigation measures included within the application. In response, Colin Leadbeatter (Development Management Area Manager) confirmed that officers were satisfied and explained that an extensive process of engagement had taken place with the applicant, the Lead Local Flood Risk Authority acting on behalf of the Council, and the Environment Agency. It was reported that the Environment Agency had undertaken detailed hydraulic modelling to assess the flood risk implications of the proposed development. It was further stated that a significant amount of work had been carried out to ensure that the proposal would not result in undue harm in relation to flood risk. It was also confirmed that the Environment Agency had concluded that the hydraulic modelling was fit for purpose and that the proposed flood risk measures were acceptable.
- Members queried whether the contribution towards a Controlled Parking Zone (CPZ) could be used for improvements to highways and for implementing parking controls in the area, including Point Place, and whether there were options for introducing control measures. In response, John Fletcher (Team Leader – Development Control, Transport Planning) indicated that the process would involve using the contribution to fund consultation on a Controlled Parking Zone. It was confirmed that implementation would require at least 50% support from the local community. It was also noted that significant development was coming forward in the area, much of which was car-free, including the current scheme, which would increase pressure on parking. Growing support for a Controlled Parking Zone was anticipated and it was confirmed that, if introduced, it would be designed to make the most efficient use of space, including the provision of parking bays and double yellow lines where necessary. While it was acknowledged that there was shortfall in disabled parking provision on the site due to its constrained layout, it was confirmed that an agreement had been reached to provide 3 disabled parking spaces along the Point Place frontage. Members were informed that this mirrored proposals for Wembley Point, which included widening Point Place and providing additional disabled parking spaces. It was further noted that once both developments were implemented, Point Place would be widened and offer improved disabled parking provision and greater flexibility for accommodating blue badge holders within 50 metres of the site. Colin Leadbeatter (Development Management Area Manager) additionally stated that the obligation relating to the Controlled Parking Zone contribution, as drafted in the Section 106 heads of terms, was sufficiently flexible to allow expenditure on highways improvements as well.

## DECISION

Having considered the application, the Committee **RESOLVED** to grant planning permission subject to:

- (1) Stage 2 referral to the GLA along with the completion of a s106 agreement to secure the planning obligations as set out in the heads of terms outlined in the committee report together with an amendment to Head of Term No 6 to reference Brent River Park and Tokyngton Recreation Ground.

(2) The conditions and informatics, as set out in the main and updated within the supplementary committee report.

(Voting on the above decision was unanimous).

## 5. **25/0357 - 37 Lydford Road, London, NW2 5QN**

### PROPOSAL

Variation of condition 2, development built in accordance with approved drawings/documents (internal and external alterations to layout, heights, footprint, ground levels, fenestration and lightwells of dwellinghouse, addition of attached water tank storage and detached bin and cycle storages, alterations to front boundary treatment, soft and hard landscaping, and arrangement of photovoltaic panels to main roof, removal of green roofs) of full planning permission 14/2952 dated 14/11/2014, for the demolition of existing office to builders' yard and erection of a 3 bedroom, three storey (including basement) dwellinghouse erection of a boundary treatment and associated hard and soft landscaping (RevisedDescription).

### RECOMMENDATION

That the Committee resolved to GRANT planning permission subject to the conditions and informatics as set out within the committee report.

Parag Dhanani (Career Grade Planning Officer) introduced the report, advising members that the application site was located within a central area of Lydford Road within the Mapesbury Conservation Area. Planning permission had been granted for the construction of a new dwelling house on the site in 2014. Whilst the dwelling house had been constructed within the site, it had not been built in accordance with the approved plans. There was an active enforcement notice in relation to the unauthorised development. The application proposed the variation of condition 2 requiring development to be built accordance with the approved drawings of the originally consented application to include changes such as internal and external alterations to layout, heights, footprint, ground levels, fenestration and lightwells of dwellinghouse, addition of attached water tank storage and detached bin and cycle storages, alterations to front boundary treatment, soft and hard landscaping, and arrangement of photovoltaic panels to main roof, removal of green roofs.

Attention was also drawn to the supplementary report circulated in advance of the meeting, which outlined minor amendments to the committee report, and related specifically to the receipt of a revised set of proposed drawings showing the correct appearance of the proposed front boundary treatment for consistency. Drawing reference numbers had also been updated within the draft decision notice to reflect the revised submitted information. Furthermore, two additional objections had been received since the issue of the committee report with matters raised that had been covered within the report, including a repeat objection from a previous representee and a briefing paper from a local resident and representative of the Mapesbury Residents Association (MAPRA). The recommendation remained to grant planning permission subject to conditions and informatics as set out within the main and

updated within the supplementary committee report. Officers presented slides taken from the drawing pack to illustrate the proposed plans.

The Chair thanked Parag Dhanani for introducing the report. As there were no Committee questions raised at this point, the Chair then moved on to consider a request which had been received to speak on the application and invited Darren Stewart (who had registered to speak as an objector) to address the Committee in relation to the application, who highlighted the following points:

- The objector began by stating that the current “as built” development, which included a reduction in the height of the flank wall in 2022, had been consistently refused planning permission, once by the Planning Inspectorate and twice by the Council.
- The speaker referred to previous reports, quoting the Planning Inspector’s report which stated that “the resulting dwelling has a discordant appearance which detracts from and therefore neither preserves nor enhances the character or appearance of the Conservation Area.”
- The speaker further cited the 2023 delegated report, which concluded that “it is not considered that the additional 3 centimetre reduction would address the previously raised concerns nor would it overcome the identified harm.”
- Reference was also made to the 2024 delegated report, which stated that “the reduction in height does not overcome the overly bulky and obtrusive form identified at appeal.”
- The speaker acknowledged that the most recent Planning Inspector’s report must be weighed as a material consideration but emphasised that this single view, which was an opinion rather than a decision, should not outweigh the detailed determinations previously made by both the Council and the original Planning Inspector in 2020, all of which concluded that the development caused harm to the Conservation Area.
- The objector asserted that the Committee was under no legal or professional obligation to follow the 2024 Planning Inspector’s view. It was noted that in 2023, despite the Planning Inspector specifically stating that the building with the reduced flank wall should be refused, the Council had allowed the application, demonstrating that the Inspector’s view, where not legally binding, was a matter to be weighed but not necessarily followed.
- In summary, the speaker stated that the Council or the Planning Inspectorate had assessed this exact development on three occasions and refused planning permission each time. The speaker urged the Committee to refuse the proposal again, as had been done previously, noting that nothing had changed since the earlier refusals and that the development continued to harm the Conservation Area.
- The speaker highlighted strong local opposition, explaining that the development had been constructed behind plastic sheeting and was met with

universal disapproval when unveiled. Following its unveiling, residents of Mapesbury had faced a continual stream of appeals and retrospective applications, including the deletion of the first retrospective application in 2023, which had attracted approximately 100 objections.

- Although 'objection fatigue' had set in, the speaker confirmed that local residents and the Mapesbury Residents Association remained unanimously opposed to the development because of the harm it caused to the Conservation Area. The speaker expressed frustration that, in an area where residents were required to adhere to strict controls over minor details of their own properties, it was unacceptable that this building, which had repeatedly and correctly been refused permission, might be allowed to remain through a process of attrition and the erosion of the Council's resolve.
- In concluding the response, the objector concluded by urging the Committee to remain consistent with previous decisions and to refuse permission for the development.

The Chair thanked Darren Stewart for addressing the Committee and invited members to ask any questions they had in relation to the information presented, with the following being noted:

- The Chair noted that matters could deviate from policy and that the Committee were required to weigh whether any deviation created substantial harm. It was questioned, other than the visual impact of the proposed development, what substantial harm would be caused to the objector and neighbouring residents. In response, the objector stated that the Council had determined on multiple occasions that the development caused harm and did not conform with policy. Darren Stewart referred to the established policy test that a building should sit below the 45 degree building envelope measured from a height of 2 meters above the boundary. It was felt that the current structure exceeded that envelope, whereas the original 2014 proposal had not. It was further stated that the building dominated and overlooked adjoining gardens, enabled direct views into neighbouring houses, and appeared out of place within the Conservation Area.

As there were no further Committee questions raised at this point, the Chair then moved on to consider an additional request which had been received to speak on the application and invited Doug Brodie (who had also registered to speak as an objector) to address the Committee in relation to the application, who highlighted the following points:

- The objector stated that the application site adjoined their garden. The speaker and their spouse had owned their property since 1990 and had raised their family there.
- It was noted that the new building directly overlooked their garden and had a direct line of sight into rear windows of their home, including the sitting room and dining room. The speaker contended that this was a direct consequence of the height of the new building.

- The speaker explained that the gardens between Teignmouth Road and St Gabriels Road backed onto each other and were approximately 100 feet in length each, providing a total separation of 200 feet between the houses. The new building had effectively reduced this distance by half, fundamentally altering privacy. The speaker contended that with a combined separation of 200 feet the houses on Teignmouth Road and St Gabriels Road could not ordinarily see one another because the tree lines between the gardens were sufficiently high to provide privacy. By bringing the new building substantially closer to the boundary and effectively building on the border of these gardens, the relative height had been raised to the extent that no trees were tall enough to maintain privacy. The speaker felt that higher the building, the worse the loss of privacy became.
- It was further stated that the application was the latest in a series of applications in which directions and approvals issued by Brent Planning had been ignored.
- It was noted that Mapesbury was designated a Conservation Area in 1982 and argued that it could only remain so if the planning restrictions authored by Brent were enforced. The objector expressed concern that the building in question had been given approval despite being in direct contradiction to many elements of Brent Planning's Area Design Guide.
- The speaker reported that residents of Mapesbury had overwhelmingly supported Brent Planning's conservation guidance for the area, which was evidenced by a continual pattern of active objections to planning submissions concerning development at the site.
- The objector additionally stated that the initial application had been submitted by an architect on the basis of needing a family home and that, once approved, the site had been sold. The speaker asserted that the subsequent owner had constructed the building using labour housed in a wooden hut built on the site without permission on which the Planning Inspectorate were aware. The Planning Inspectorate upheld the enforcement notice dated 11 October 2021.

The Chair thanked Doug Brodie for addressing the Committee and invited members to ask any questions they had in relation to the information presented, with the following being noted:

- As an initial query, members questioned whether, if development were to take place on the site, the objector would accept any form of development and what character of building he would consider appropriate. In response, the objector stated that Mapesbury had been built between 1895 and 1905 and that the design guidelines had been prepared by Brent Planning in support of the original designation of the Conservation Area. Doug Brodie noted that, when the proposal had been described to the Mapesbury Residents Association (MAPRA) as a modern interpretation of the guidelines, members had considered this approach incompatible with conservation, which was predicated on maintaining established architectural features rather than reinterpreting them in a contemporary manner. It was also stated that, although

the building had now been permitted and constructed, the principal issue was that Conservation Area status was rendered ineffective unless enforcement action was taken promptly and consistently. It was highlighted that further sites within the Mapesbury estate were coming forward and that the maintenance of the Conservation Area rested with the planning department at Brent. It was further added that, if enforcement could not be maintained due to resource constraints, the Council should state this openly. It was additionally noted that the case had been ongoing since 2014 and that the property had remained vacant. Doug Brodie referred to the location plan, which showed large rear gardens with the building appearing out of place within that context. It was observed that the building had a flat roof within a Conservation Area and it was suggested that any new building should reflect the prevailing character and appearance of surrounding properties.

- The Chair observed that when Conservation Areas and other plans had been designated in the 1980s, the present housing crisis could not have been fully anticipated. It was stated that developments involving building within gardens were being approved in other wards in Brent and that a single area could not be exempted from an approach applied elsewhere. The Chair summarised the two principal strands of objection. The first was that there should be no building at all and that the land should remain as garden. The second was that some development might be acceptable, but that the current proposal was too large, of the wrong design, and not in keeping with the area. The Chair asked the objector which position he favoured. In response, the objector stated that, while he personally considered that the land should remain garden and had lived there for 35 years, he recognised that arguing for no development at all would be futile given the planning history. It was stated that the site location was inappropriate for the current building form and suggested that, if permission were to be approved, the Council should return to the parameters of the original consent. It was further noted that the building had been deliberately designed at an overscale by the architect. Doug Brodie raised a rhetorical question around whether Brent Planning would set a clear precedent that, in a contentious Conservation Area location, the minimum expectation was that any developer should adhere to the lines and parameters previously approved.

The Chair thanked Doug Brodie for responding to the Committee's queries and then moved on to offer the Committee the opportunity to ask the officers any remaining questions or points of clarity in relation to the application, with the following being noted:

- In advising the Committee on the weight that should be given to the most recent appeal decision when determining the application, Paul Weeks (Senior Planning Lawyer) stated that the last appeal had been dismissed primarily due to the provision of a parking space at the front and related landscaping matters. It was reported that, in respect of design, the Inspector had differentiated the findings from the previous appeal by reference to additional evidence submitted at the later stage. It was noted that, without that information, it would have been difficult for the previous Inspector to conclude that the design was unacceptable. It was further advised that the design had effectively already been considered by an Inspector and that the sole reason for dismissal at the

most recent appeal concerned the parking and landscaping issues rather than design. It was concluded that the existence of this appeal decision represented a significant material consideration and that departing from the Inspector's findings could have repercussions in the event of a further appeal. Victoria McDonagh (Development Management Service Manager) additionally noted that the application had been referred to Committee due to the number of objections received and had therefore not been determined under delegated authority.

- The Chair questioned how much flexibility members had when determining the application in view of the legal advice provided. In response, David Glover (Head of Planning and Development Services) explained that members were required to have regard to all material considerations, including previous decisions on the application and particularly any appeal decisions relating to comparable development on the site. It was advised that decision makers could consider whether information not available to a previous Inspector was now available and whether such information might have led that Inspector to reach a different conclusion. The Committee were reminded that the Council had refused planning permission and that the subsequent appeal had been dismissed, following an earlier dismissal on a previous refusal. Attention was drawn to the most recent Inspector's report, which noted the earlier Inspector's conclusion that a reduction in the building height would not overcome the identified harm to the Conservation Area. The more recent Inspector stated that the absence of contextual analysis informed by robust evidence would have made it difficult for the earlier Inspector to conclude otherwise than that the dwelling was not appropriate for its context. Having reviewed evidence that had not been before the earlier Inspector, the more recent Inspector was satisfied that the concerns regarding dominance in the street scene by virtue of height and massing had been addressed. It was confirmed that the current submission did not contain additional information that would lead officers to a different conclusion in relation to their recommendation on this application. It was therefore advised that significant weight should be afforded to the more recent Inspector's view in respect of the relevant aspects of the scheme.
- Members questioned whether any guidance had been provided from the Conservation Officer. In response, Parag Dhanani (Career Grade Planning Officer) confirmed that the Conservation Officer had been consulted. It was reported that the Conservation Officer had considered the proposal to be of contemporary design and that the assessment provided by planning officers was sufficient in this case.
- Following on from the previous question, members queried when the Conservation Guide, originally written in the period around 1895, had last been updated. In response, Damian Manhertz (Development Management Area Manager) clarified that the Guide had been updated in 2018. It was clarified that the Conservation Officer's comments referred to the first application that had been approved. Members were informed that the Planning Inspector had undertaken a heritage assessment and applied the relevant statutory tests for decision making within a Conservation Area. Following that assessment,

officers had considered what differences needed to be made to address matters identified in the appeal decision as unacceptable.

- Assurance was sought that the Conservation Officer considered the scheme to meet the 2018 guidance. In response, Damian Manhertz (Development Management Area Manager) confirmed that this was correct and further stated that the required test assessing whether the proposal resulted in harm within the Conservation Area had been applied and that the proposal met those tests. Victoria McDonagh (Development Management Service Manager) additionally advised that in the previous appeal decision in 2024 the Inspector had concluded that the scheme was compliant with Brent's Local Plan, specifically policies DNP1 and BHC1. It was reported that the Inspector's conclusions included that the scheme sought to conserve and enhance the significant heritage asset and required the developer to complement the locality and contribute to local distinctiveness.

## DECISION

Having consider the application, the Committee **RESOLVED** to grant planning permission subject to:

- (1) The conditions and informatics, as set out in the main and updated within the supplementary committee report.

(Voting on the above decision was as follows: 4 in favour of granting planning permission, 1 in favour of refusal and 1 abstention).

## 6. Any Other Urgent Business

There was no other urgent business.

The meeting closed at 7.34 pm

COUNCILLOR KELCHER  
Chair



## LONDON BOROUGH OF BRENT

### MINUTES OF THE PLANNING COMMITTEE

**Held in the Conference Hall, Brent Civic Centre on Wednesday 10 December 2025 at 6.00 pm**

PRESENT: Councillor Kelcher (Chair) and Councillor S Butt (Vice-Chair) and Councillors Akram, Begum, Chappell, Dixon, Johnson and J Patel.

#### 1. Welcome and Apologies for absence

There were no apologies for absence.

#### 2. Declarations of interests

In relation to Agenda Item 3: 25/1069 – Havenwood Garages, Councillor Johnson declared a personal interest as a Ward Councillor of Barnhill, the ward under which the planning application relates and had also received briefings on the scheme from Metropolitan Thames Valley Housing (MTVH).

Councillor Johnson had not sought to take any predisposed position in the consideration of the application and therefore felt able to consider the matters relating to the planning application impartially and without any form of pretermination. He therefore remained present for the duration of the discussion and consideration of the application for decision.

No other declarations of interest were made during the meeting.

#### 3. 25/1069 – Havenwood Garages opposite 1-9, Havenwood, Garages at Davy House, Einstein House, Faraday House, Car Parks next to Darwin House and Harvey House and Electricity Sub Station next to Currie House, Darwin House, Kingsgate, Wembley

#### PROPOSAL

Demolition of existing garages and redevelopment of the site to provide 5x residential blocks (Use Class C3) and relocation of the existing substation, together with associated car parking, cycle storage, refuse storage, amenity space and landscaping.

#### RECOMMENDATION

That the Committee resolve to GRANT planning permission subject to the completion of a legal agreement capturing the planning obligations as detailed within the committee report, and the conditions and informatics as set out in the report.

Colin Leadbeatter (Development Management Area Manager) introduced the report, advising members that the application sought full planning permission for the

demolition and redevelopment of the existing garages within the site to provide 5 residential blocks, comprising 61 new homes. Each new unit would be social rent in tenure. The scheme would also include ancillary landscaping, cycle parking and refuse stores. The existing substation would also be moved to the north of Kingsgate, between the proposed Blocks D and C.

Members' attention was then drawn to a minor correction on page 12 of the committee report. Within the Highways and Transportation section, the report stated that the development would provide '113 long-stay cycle spaces'. The correct figure was 115 spaces, which exceeded London Plan standards. It was noted that the correct figure was stated elsewhere in the report.

The Chair thanked Colin Leadbeatter for introducing the report. As there were no Committee questions raised at this point, the Chair then moved on to consider a request which had been received to speak on the application and invited Mariana Jalloh (who had registered to speak as an objector) to address the Committee in relation to the application, who objected to the application on the following grounds:

- The speaker, a resident of Einstein House directly affected by the proposed Block E, stated that the height and position of Block E, located approximately 12 metres from Einstein House, had significantly reduced the daylight and sunlight to habitable rooms, reaching bedrooms and living areas. It was emphasised that this proximity and scale would result in unacceptable overshadowing.
- The objector reported that, at a separation distance of only 12 metres, balconies and windows within Block E would directly overlook bedrooms and living rooms in Einstein House. This distance was noted as being below the typical 18-21 metres separation standard. Mariana Jalloh further observed that no mitigation measures, such as screening, angled windows, or obscure glazing, had been proposed. It was highlighted that the existing single-storey garage on the site would be replaced by a three-storey structure, thereby intensifying the degree of overlooking.
- It was further stated that the proposal would remove the secure gated area and introduce a public footpath immediately adjacent to ground-floor bedrooms, raising specific concerns in relation to noise and disturbance, particularly during evening and night-time hours; increased safety risks and potential for anti-social behaviour; and light pollution from pathway lighting shining into ground-floor bedrooms. Mariana Jalloh requested that these matters be fully considered.
- The speaker asserted that the positioning of Block E would cause disproportionate harm to existing residents. While the wider scheme included green space, Block E had been located in the area that created the greatest adverse impact, whereas other blocks within the development did not create comparable intrusion.
- The objector referred to the proposed car-free nature of the development and stated that it was unclear how this would be enforced or managed. It was felt that no details had been provided within the committee report regarding the

specific arrangements. It was additionally noted that the Chalkhill area currently experienced significant parking pressures, with widespread use of a free car park and frequent double parking. It was further observed that parking only operated effectively on event days (estimated at 50-60 events per year). It was felt that introducing additional residents without clear parking controls would have a significant impact on local conditions.

- In concluding the response, Mariana Jalloh summarised that the proposal would result in:
  - 1) Loss of light to habitable rooms;
  - 2) Loss of privacy due to direct overlooking at substandard separation distances without mitigation;
  - 3) Safety, noise, and light pollution impacts arising from the introduction of a public footpath;
  - 4) Disproportionate harm caused by the siting of Block E; and
  - 5) Unresolved concerns regarding the enforcement of a car-free development and its impact on existing parking pressures.

On this basis it was therefore requested that the Committee give full consideration to these matters and seek appropriate revisions to mitigate the identified harms.

The Chair thanked Mariana Jalloh for addressing the Committee and then invited members to ask any questions they had in relation to the information presented, with the following being noted:

- As an initial query, the Chair asked whether, in considering mitigation, the objector regarded the loss of privacy or the loss of light as the greater concern, noting that measures such as screening and tree planting could address privacy but might further reduce light. In response, Mariana Jalloh advised that the most significant concern was the loss of privacy, as the affected rooms were bedrooms. It was explained that residents currently closed curtains frequently, although the existing garages meant there was no pedestrian movement in that area. It was emphasised that the proposed development would require curtains to remain closed at all times, which was unacceptable. While acknowledging that some mitigation might be possible, it was noted that the loss of light was already an issue and would be substantially worsened. It was reiterated that privacy was the primary concern.
- The Chair referenced concerns raised by the speaker in their presentation to the Committee regarding the car-free nature of the development and explained that most new developments in Brent were car-free to reflect declining car ownership and to encourage sustainable travel. It was noted that funding was included in the report for a feasibility study on introducing a Controlled Parking Zone (CPZ), which could help manage parking and address existing issues. The Chair asked whether this information altered the objector's view on parking concerns. In response, Mariana Jalloh stated that the area comprised low-income families and expressed concern about the negative financial impact of requiring residents to purchase parking permits should a CPZ be introduced. It was additionally noted that residents already paid for event-day parking permits

and that any additional cost would be burdensome. While acknowledging that parking needed to be managed, the speaker stressed that measures should not disproportionately affect low-income households.

- Following up, the Chair questioned whether the objector opposed any development on the site or whether they would support an alternative scheme. In response, Marianna Jalloh confirmed that she was not opposed to the overall development and recognised the need for housing. It was further stated that her objection related specifically to the impact of Block E on Einstein House. The remainder of the development was considered acceptable and it was noted that other blocks appeared to have taken residents' needs into account. It was felt that Einstein House had been overlooked and Marianna Jalloh requested reconsideration of Block E's positioning to reduce its intrusive effect on existing families.
- Questions were raised around whether the speaker would object to a CPZ if the Council negotiated one year of free parking for existing residents, followed by a paid arrangement thereafter. In response, Mariana Jalloh indicated that one year of free parking or a reduced rate for a longer period would be helpful. It was noted that low-income families budgeted carefully and that a sustainable solution was needed. Mariana Jalloh suggested conducting a survey to identify residents with vehicles before making decisions and expressed a preference for consultation rather than imposing arrangements without engagement. The Chair clarified that the funding referenced in the proposal was for a feasibility study and not for immediate implementation. The study would consider the issues raised before any decision was made.
- Members questioned whether, if the issues of loss of privacy and loss of light were addressed, the objector's view on the application would change. In response, Mariana Jalloh expressed that concerns would remain due to the proposed balconies, which were positioned to overlook bedrooms. It was explained that balconies were social spaces and would allow direct views into bedrooms, even if windows were obscured. It was additionally noted that the current garage provided privacy because access was restricted by a gate, but that the proposed arrangement would remove this safeguard. It was confirmed that Mariana Jalloh would continue to object on the basis of privacy concerns arising from the balconies.
- Members noted that the report acknowledged the issue of overlooking from balconies and confirmed that screening would be considered at the implementation stage. In response, Mariana Jalloh expressed concern that decisions on screening would be deferred until implementation, which created uncertainty. It was feared that inadequate measures might be adopted later. Member assured the speaker that planning officers would be asked to provide clarification on these matters when technical questions were addressed during the later stage of the proceedings.

As there were no further Committee questions raised at this point, the Chair then moved on to consider an additional request which had been received to speak on the application and invited Chirag Vora (who had also registered to speak as an objector)

to address the Committee in relation to the application, who highlighted the following points:

- Chirag Vora began by stating that the construction of garages at Davy House would directly overlook his garden and bedrooms, resulting in a significant loss of privacy.
- The speaker reported ongoing issues of drug dealing in the area, which had caused considerable nuisance to residents and noted that the police had attended the area daily in response to these incidents, although the problem persisted. The speaker expressed concern that the proposed development, particularly its social housing element, could exacerbate these issues depending on future occupants.
- The objector stated that he also opposed the construction on the grounds of increased littering, which he considered detrimental to the local environment.
- In concluding the response, Chirag Vora reiterated his objection to the proposal based on the combined impact of loss of privacy, anti-social behaviour, and litter.

The Chair thanked Chirag Vora for addressing the Committee and then invited members to ask any questions they had in relation to the information presented, with the following being noted:

- The Chair observed that the objector had referred to existing issues, including parking difficulties, anti-social behaviour and litter. The Chair stated that the introduction of a car-free development, if properly managed and supported by a Controlled Parking Zone (CPZ), could address parking problems rather than exacerbate them, as it would involve investment that would not otherwise be available. The Chair further noted that the speaker had raised concerns about anti-social behaviour and litter and suggested that these issues might be linked to the presence of existing garages, which were underused and created dark spaces that attracted such behaviour. The Chair stated that replacing garages with housing would create a more open and overlooked environment, which could reduce anti-social behaviour. The Chair asked the speaker for his view on these points. In response, Chirag Vora stated that he hoped the development would have a positive effect but expressed doubt that littering would improve. It was explained that refuse bins were already full under current conditions and considered that additional housing would worsen the situation.
- The Chair cited the speaker's earlier comments in their presentation to the Committee regarding anti-social behaviour and questioned whether it was felt that his concerns about social housing were prejudiced against those living in such accommodation. In response, Chirag Vora asserted that his comments were not prejudiced and that he understood the importance of social housing. It was further explained that his concern related to uncertainty about future occupants, noting that there were existing residents who caused significant nuisance. He reported that the police had been called on numerous occasions without resolution. The objector emphasised that he was not opposed to social

housing itself but was concerned about individuals who did not behave responsibly.

- Members questioned whether the objector had used the reporting app to raise concerns about litter. In response, Chirag Vora noted that the area was managed by Metropolitan Housing and that residents had reported issues repeatedly. It was explained that promised action had not been taken, resulting in rat infestations. It was additionally stated that residents had been obliged to arrange pest control measures, including traps, to prevent rodents entering properties. The Chair noted that the issues described were existing problems and commented that such matters were common across Brent and other areas. The Chair highlighted that these concerns did not directly relate to whether the proposed development would worsen or improve the situation. The objector then reiterated his earlier concerns regarding the construction at Davy House and its potential to overlook his boundary wall, garden and bedrooms.

As there were no further Committee questions raised at this point, the Chair then moved on to consider a request which had been received to speak on the application and invited Councillor Fraser (who had registered to speak as a Ward Councillor) to address the Committee in relation to the application, who highlighted the following points:

- Councillor Fraser began by advising that she had lived, worked and represented the Chalkhill community for 20 years prior to being elected as Barnhill Ward Councillor 3 years ago. It was emphasised that Chalkhill was her community and that decisions taken at the meeting were not abstract but directly affected the streets, estates and families she knew personally.
- Councillor Fraser acknowledged the significant benefit of the proposal, namely the provision of 61 homes for social rent, which represented a substantial and welcome contribution towards meeting Brent's acute housing need. She recognised the work undertaken to bring forward a scheme that delivered genuinely affordable homes for local people and stated that, from her own casework, she was acutely aware of the urgent need for such housing. It was additionally noted that this was not merely a matter of aspiration but of dignity, security and stability for the most vulnerable residents in Brent. However, the Ward Councillor explained that she was speaking on behalf of existing residents living around the 5 proposed sites. She reported that a petition signed by over 100 people had been submitted to Metropolitan Housing, in addition to the objections before the Committee. It was stated that the issue was one of balance. While many residents accepted the need for new homes, they were understandably concerned about the day-to-day disruption the development would cause and outlined the following concerns:
  - 1) Residents feared that they would be placed further down the list for replacement kitchens and bathrooms and that repairs would be delayed.
  - 2) There were concerns about dust during construction, particularly as the area already experienced the second worst air quality in the borough.
  - 3) Homes built in garage spaces or at the ends of blocks would reduce access to fresh air.

- 4) Residents worried about the removal of parking spaces, which could leave some housebound, and about the lack of consideration for medical conditions that made access to parking essential.
- 5) Existing car parks were poorly managed and overrun by abandoned vehicles and car businesses, with no enforcement action taken.
- 6) Concerns were raised about the siting of a children's play area adjacent to a car park, despite objections.
- 7) Residents feared the imposition of a parking scheme that would impose additional financial burdens on low-income families.
- 8) Safety concerns were highlighted in relation to the provision of 61 new dwellings, many of which were 1 bedroom units, with no apparent consideration for integration measures, local support for mental health needs or access to already overstretched GP surgeries.
- Councillor Fraser stressed that these concerns were genuine and deeply felt by the Chalkhill community. It was clarified that the Chalkhill Community Trust Fund was a grant-making body and entirely separate from Chalkhill Community Centre Limited, which operated as a venue for hire rather than a community resource with concern also raised about the lack of local presence and engagement from Metropolitan Thames Valley Housing.
- The Ward Councillor urged the applicant to consider the perspective of residents and to recognise that disruption was not a minor inconvenience but something that directly affected wellbeing and quality of life. She called for clear and consistent communication and highlighted that residents perceived a lack of coordination within Metropolitan Thames Valley Housing.
- Councillor Fraser emphasised that residents were not seeking to halt progress but wished to be treated with respect throughout the process. She placed on record her expectation that every possible mitigation measure would be implemented and that conditions would be enforced robustly, including strong site management. It was further stated that while the new homes could deliver long-term benefits for the borough, the manner in which the development was delivered was critical. It was additionally requested that the Council work closely with the applicant at every stage and that residents be treated as partners rather than as an afterthought.
- Councillor Fraser concluded by stating that should the Committee resolve to approve the application, it was essential to ensure that both the homes and the process of delivery were managed correctly. Hope was expressed that the scheme would become a source of pride for the community for decades to come, rather than something residents were forced to endure.

The Chair thanked Councillor Fraser for addressing the Committee. As there were no Committee questions raised at this point, the Chair then moved on to consider a further request which had been received to speak on the application and invited Dominique Mirepoix (who had registered to speak as the applicant's representative) to address the Committee in relation to the application, who highlighted the following points:

- The applicant's representative began by stating that the application sought to redevelop underutilised and largely unoccupied garages to deliver new, high-quality affordable homes. It was explained that the scheme would address safety risks posed by the existing structures and formed part of Metropolitan Thames Valley Housing's ongoing commitment to optimise its assets.
- The representative reported that the proposal for the Chalkhill Estate reflected extensive engagement with residents and the wider public since 2023. This included detailed pre-application discussions with Council officers, a review by the Quality Review Panel, and collaboration with Secured by Design officers and the local community. Engagement activities had involved liaison with the Chalkhill Residents' Association, Chalkhill Community Trust Fund, Chalkhill Community Action Group and Chalkhill Primary School. Additional measures included newsletters, drop-in sessions, door-knocking, exhibitions, design workshops, a dedicated website and briefings for local Ward Councillors.
- It was confirmed that all 61 homes proposed would be genuinely affordable and provided at Social Rent, thereby delivering 100% affordable housing. It was further noted that 25% of the homes would be family-sized, meeting an identified need within the borough.
- The representative further stated that the design was landscape-led and community-focused, comprising 5 separate buildings ranging from 3 to a modest 5 storeys, which he considered appropriate to the local context. It was explained that high-quality materials had been selected to respond to the existing architecture of the estate and that the design had been thoroughly reviewed by the Quality Review Panel to achieve an appropriate balance between built form and public realm. It was further added that the applicant had responded to feedback from residents by reducing the number of homes originally proposed and addressing concerns about overdevelopment, while continuing to meet the critical need for affordable housing.
- Dominique Mirepoix highlighted that the proposal had been designed in accordance with the Brent Design Guide to protect the privacy and amenity of neighbouring properties. It was stated that a specialist daylight and sunlight report had been submitted and demonstrated acceptable results.
- The applicant's representative also reported that existing car parking provision had been reconfigured in response to resident feedback. It was confirmed that the new homes would be car-free and that future occupiers would not be eligible for parking permits within the estate. It was additionally stated that the proposal included cycle parking provision comprising 115 long-stay spaces and 36 short-stay spaces. To address the loss of informal cycle storage within the garages to be demolished, existing residents who previously stored bicycles in garages would be granted access to the new cycle storage facilities.
- The representative further noted that all homes would have access to private amenity space in the form of balconies, terraces or gardens. It was also explained that the detailed landscape strategy had been informed by resident

feedback and included a communal allotment, play spaces, seating areas and 51 new trees, thereby creating improved recreational opportunities for existing and new residents.

- Confirmation was provided that fire safety had been considered from the outset and that a Fire Statement had been submitted in accordance with the London Plan.
- In concluding the response, Dominique Mirepoix summarised that the proposed development to provide 61 new homes was supported by planning policy and would deliver significant benefits for new and existing residents as well as Brent Council. These benefits included enhanced facilities, improved amenity and the delivery of genuinely affordable housing. The representative expressed the hope that members would support the officer recommendation for approval.

The Chair thanked Dominique Mirepoix for addressing the Committee and then invited members to ask any questions they had in relation to the information presented, with the following being noted:

- As an initial point, members referred to the objections raised by the first speaker concerning privacy and outlook from balconies and windows into ground-floor properties. It was noted that tree planting had been suggested as mitigation but observed that tree canopies were typically high and would not provide adequate screening for residents. Assurances were sought that mitigation measures could be implemented to address these concerns. In response, Dominique Mirepoix (Applicant's representative) stated that the design had incorporated the 30 degree and 45 degree rules set out in the Brent Design Guide. It was confirmed that a planning condition included in the committee report required details of balcony screening for Block E to be submitted at the time of its development.
- Reference was made to sections of the building where windows overlooked neighbouring properties at a distance of approximately 11.9 metres, which was below the usual 18 metre standard. Details were sought as to whether it would be possible to obscure these windows, particularly those on the 12 metre flank of the building, as tree planting would not provide adequate screening for ground floor residents. In response, Mike Martin (Landscape Architect, member of the applicant's team) acknowledged that tree canopies would not provide immediate screening but explained that multi-stem trees could be planted to provide coverage from the base upwards. It was added that hedges and other planting could be maintained to grow to a suitable height for screening. It was confirmed that trees of varying sizes could be introduced, including larger trees in locations where additional screening was required.
- Members noted that the proposed landscaping measures would take time to mature and would require ongoing maintenance. Concern was expressed that residents had raised issues regarding the applicant's management of the site and stated that he sought measures requiring minimal intervention and cost-effective maintenance, such as screening for windows. In response, Audrey

Remery (Architect, member of the applicant's team) confirmed that screening panels could be incorporated into the design to increase privacy.

- In referring to concerns regarding parking and noted that the removal of 105 garages could exacerbate existing problems caused by business use and abandoned vehicles. It was questioned whether a parking strategy would be implemented to address these issues. In response, Dominique Mirepoix (Applicant's representative) confirmed that 105 garages would be demolished, of which 71 or 68% were currently void and unoccupied. It was further added that 47 garages posed potential health and safety risks due to structural issues. It was additionally stated that a transport statement had been submitted, including parking demand surveys. Amin Fouladi (Transport Consultant, member of the applicant's team) further explained that extensive pre-application meetings had taken place with Brent Highways officers. It was stated that surveys had been conducted during several periods, including December 2023, to assess demand when residents were most likely to be at home. It was also confirmed that the design sought to re-provide existing demand without encouraging additional car ownership, in line with the London Plan.
- Members acknowledged the strategy to reduce parking provision but noted that this did not address existing problems caused by abandoned vehicles and business use. Clarification was sought on how the proposed scheme would resolve these issues. In response, Amin Fouladi (Transport Consultant, member of the applicant's team) stated that a robust calculation had been undertaken within the site boundary to assess displaced garages and their impact on public highways and private parking areas. It was confirmed that the proposed scheme accounted for this demand. Andrew Gatehouse (MTVH, Applicant) confirmed that a planning condition required the introduction of a car parking management plan for the northern car park. It was also stated that MTVH intended to appoint one of its existing providers to manage parking on the estate. Following up, members queried whether residents would be consulted prior to the introduction of any parking scheme, to which Andrew Gatehouse (MTVH, Applicant) confirmed that residents would be consulted before implementation.
- Members noted existing issues with refuse collection and sought clarification of how these would be addressed alongside the introduction of 61 new dwellings. In response, Dominique Mirepoix (Applicant's representative) confirmed that 1100 litre bins would be provided within dedicated refuse stores associated with each of the 5 proposed buildings. It was stated that a refuse management plan would be implemented and that tracking diagrams had been prepared to ensure servicing did not adversely affect residents. Amin Fouladi (Transport Consultant, member of the applicant's team) further explained that Brent Highways requirements had been incorporated into the design to ensure operatives could access refuse stores. It was confirmed that a delivery and servicing management plan would be secured by condition to support efficient refuse collection. It was added that consultations had taken place with landscape architects to address litter concerns and that additional bins would be provided for existing residents as part of the proposal.

- Members highlighted concerns raised by the first speaker regarding the management of the estate and noted that there appeared to be a lack of confidence in the ability of Metropolitan Thames Valley Housing (MTVH) to manage the site effectively, particularly in light of the proposed introduction of 61 new homes. While estate management was not a planning matter, it was suggested that MTVH should improve its performance in this regard.
- Members noted that the scheme provided an opportunity to relieve housing pressures through the lettings plan and questioned whether issues of under-occupation and overcrowding would be taken into account should the scheme be approved. In response, Andrew Gatehouse (MTVH, Applicant) clarified that the intention was for MTVH teams to discuss the potential benefits of a local lettings plan to address under-occupation and overcrowding on the Chalkhill Estate. It was explained that this would need to align with the borough-wide housing applications list and it was confirmed that discussions with officers were intended to take place closer to the time of completion.

The Chair thanked Dominique Mirepoix and his team for responding to the Committee's queries and then moved on to offer the Committee the opportunity to ask the officers any remaining questions or points of clarity in relation to the application, with the following being noted:

- In presenting slides from the drawing pack to illustrate the proposed plans, Colin Leadbeatter (Development Management Area Manager) provided confirmation that a privacy screening condition applied specifically to Block E and stated that this could be expanded to include screening to the edges of balconies overlooking Kingsgate. It was further noted that two windows served the living room and kitchen in the corner plot and explained that the window facing Einstein House could be obscure glazed to a certain height to mitigate harm. It was clarified that this was the window closest to Einstein House.
- In highlighting concerns raised regarding lighting and reflections, members questioned whether procedures or mechanisms could be implemented to monitor luminance levels and ensure compliance. In response, Colin Leadbeatter (Development Management Area Manager) explained that the scheme was currently at the detailed design stage and not yet implemented. It was confirmed that a number of conditions had been recommended for inclusion within the consent. These included a landscaping condition requiring full details of landscaping and a specific condition relating to lighting. The lighting condition would require submission of details covering luminance levels, operational arrangements and measures to mitigate impacts on residents. These details would be assessed at the condition discharge stage in consultation with relevant colleagues.
- Clarification was sought as to whether responsibility for addressing lighting issues after development completion would rest with MTVH or the Council. In response, Colin Leadbeatter (Development Management Area Manager) confirmed that the estate would remain in private ownership and that management of lighting systems would therefore be the responsibility of the

applicant. It was added that if a breach of condition occurred, the Council could investigate and take appropriate action.

- Following up, members further asked what avenues would be available for residents to raise concerns if lighting caused problems and whether such matters were addressed through planning conditions or building control regulations. In response, Colin Leadbeatter (Development Management Area Manager) stated that a landscape management plan would be required as part of the landscaping condition and that this document would govern ongoing maintenance. It was confirmed that planning permission required compliance with approved details for the lifetime of the development. The expectation that residents would have a route to raise concerns with the relevant management team responsible for maintenance was expressed.
- Further assurance was then sought by members to ensure that planning conditions would be robustly managed. In response, Colin Leadbeatter (Development Management Area Manager) reassured members that conditions were either compliance conditions or dischargeable conditions. Conditions relating to matters such as the car park management plan, lighting strategy and delivery and servicing plan would require submission and assessment through a further application process. It was confirmed that these submissions were rigorously reviewed in consultation with relevant departments. It was further added that planning permission required adherence to approved details for the lifetime of the development unless otherwise agreed and that breaches could be addressed through planning enforcement. It was additionally noted that MTVH was a Registered Provider (RP) with whom the Council maintained regular communication and that informal engagement would be used where possible to resolve issues before formal action was taken. In continuing the response, David Glover (Head of Planning and Development Services) further explained that some matters were controlled through planning while others fell under separate legislation. It was confirmed that the planning team worked closely with other departments, including Nuisance Control for issues such as excessive noise, out-of-hours working and dust, and with Highways for matters such as mud on roads. It was also stated that the Council would collaborate across departments to identify the most appropriate route for addressing any issues.
- Referring to concerns expressed by the first speaker regarding loss of daylight and sunlight, members sought details around how significant the impact would be. In response, Colin Leadbeatter (Development Management Area Manager) explained that daylight and sunlight assessments were undertaken in accordance with BRE guidance, which was advisory rather than mandatory policy. It was noted that the National Planning Policy Framework allowed flexibility in applying this guidance to reflect site-specific constraints and design priorities. It was stated that infill developments were inherently challenging and that the proposal sought to make efficient use of land to deliver affordable homes without causing undue harm to neighbouring amenities. It was confirmed that the report assessed impacts against BRE guidance and identified that a small number of windows and 3 gardens would fall below recommended targets. It was explained that these shortfalls were limited and

largely attributable to existing features such as overhanging balconies and projecting walls. It was reported that 88% of windows tested met or exceeded BRE daylight standards and that most rooms retained good levels of light for an urban setting. All but 3 existing gardens met the BRE overshadowing test and communal open spaces would be well sunlit. It was additionally stated that BRE guidance and national policy supported a flexible approach and that, given overall compliance and mitigating factors, the impact on neighbours was considered acceptable when weighed against the benefits of the scheme. It was confirmed that the main criteria for daylight assessment was the vertical sky component test and that the majority of windows met or exceeded targets, with only a small number falling below. It was concluded that these windows would still have adequate access to daylight.

- Referring to earlier comments made by Councillor Fraser (as Ward Councillor) regarding poor air quality in the area, members sought details on how the proposed scheme would address this issue. In response, Colin Leadbeatter (Development Management Area Manager) noted that an Air Quality Assessment had been submitted with the application and that condition 12 required the development to be carried out in full accordance with the mitigation measures set out in that assessment. It was further stated that air quality measures would also apply to non-road mobile machinery during demolition and construction phases. It was additionally stated that the site was not located within an air quality focus area and that the proposal was required to be air quality neutral. It was explained that the assessment indicated no significant residual impacts during construction and that predicted pollutant concentrations for 2026 would fall well below relevant annual air quality objectives. The Chair noted that nitrogen oxide and particulate matter levels were key indicators of air quality and stated that the area was not among the top ten most polluted roads in Brent, although improvements to air quality remained a priority.
- As a further issue highlighted, details were sought on how the protection of species such as bats, birds and insects would be addressed. In response, Colin Leadbeatter (Development Management Area Manager) confirmed that the landscaping condition included details of ecological management as part of the statutory Biodiversity Net Gain process. It was stated that a Preliminary Ecological Appraisal had been submitted, identifying habitats within the site as comprising grassland, scattered trees, flats, garages and fencing, all of relatively low biodiversity value. It was further noted that buildings were assessed as having moderate potential for roosting bats due to proximity to mature trees and gardens and that further surveys would be required by condition to ensure no bats were present.
- Further details were then requested regarding the contribution for a Controlled Parking Zone (CPZ). In response, John Fletcher (Team Leader - Development Control, Transport Planning) confirmed that the contribution would fund consultation and subsequent implementation if supported by residents.
- Members further queried whether reduced CPZ fees could be considered for residents if consultation indicated support. In response, David Glover (Head of Planning and Development Services) explained that by law contributions could

not be secured through a Section 106 agreement to reduce CPZ permit costs. Any reduction would need to be addressed through the Council's parking policies. Following up, members questioned whether the Registered Provider could contribute voluntarily to reduce CPZ costs. In response, David Glover (Head of Planning and Development Services) confirmed that the Registered Provider could do so voluntarily but could not be required to. John Fletcher (Team Leader - Development Control, Transport Planning) further stated that off-street parking would be privately managed and that a car parking management plan would be signed off by the Council. It was additionally confirmed that parity between on-street and off-street charges would be sought to avoid displacement of parking.

- Further details were sought on emergency access arrangements and it was questioned whether the lack of a turning head for fire appliances at the eastern end of Block A was acceptable. In response, John Fletcher (Team Leader - Development Control, Transport Planning) confirmed that the Fire Brigade had reviewed the arrangements and was satisfied that they were acceptable. Colin Leadbeatter (Development Management Area Manager) further explained that dry risers would be installed towards the eastern end to enable emergency vehicles to reverse while maintaining access.
- Clarification was sought by members regarding blue badge parking spaces and electric vehicle charging points, and how these would be managed. In response, John Fletcher (Team Leader - Development Control, Transport Planning) confirmed that disabled parking spaces would be located within the private off-street area and that electric vehicle charging points would also be provided in private areas. It was also stated that residents requiring on-street provision could apply for bays and that the Council would manage on-street electric vehicle charging.
- Questions were raised around how the allocation of wheelchair parking bays would operate if wheelchair-accessible units were unoccupied and a resident in a non-wheelchair unit became eligible for a blue badge. It was queried whether bays would be tied to wheelchair units and what would happen if the occupant of a wheelchair unit did not require a vehicle. Clarification was sought on whether the policy would restrict flexibility or whether this matter remained subject to further exploration. In response, John Fletcher (Team Leader - Development Control, Transport Planning) confirmed that the intention was to avoid permanently allocated spaces tied to specific properties. It was stated that spaces should remain flexible and reviewed at least annually to ensure they were available for those who required them, thereby preventing unused spaces from being locked to units.
- Returning to the highlighted concerns raised by the first speaker regarding dust and site traffic, members questioned whether measures such as dampening vehicles, using covers and watering down during demolition could be required at this stage or whether these would be addressed solely through the Construction Management Plan. It was also questioned whether guidance could be provided to ensure these measures were incorporated when the plan was prepared. In response, Colin Leadbeatter (Development Management

Area Manager) confirmed that condition 14 required a Construction Logistics Plan, which was detailed on page 51 of committee report. It was stated that this condition, together with an additional requirement for a Construction Method Statement, would capture measures to manage construction impacts on highways and control dust and noise. It was further added that secondary legislation under the Control of Pollution Act 1974 also applied and that construction hours would be controlled through planning conditions and environmental health powers.

- Members noted that the Considerate Contractor Scheme (CCS) was not a requirement and sought details around whether the applicant intended to join such a scheme or had its own equivalent policies as some developers often presented such commitments to the Committee. In response, Colin Leadbeater (Development Management Area Manager) suggested that this question was best directed to the applicant but expressed the view that the conditions attached to the draft decision notice provided sufficient control over environmental issues arising during construction, including vehicle movements. It was also noted that the applicant was present and could consider the suggestion.

## DECISION

Having considered the application, the Committee **RESOLVED** to grant planning permission subject to:

- (1) The completion of a legal agreement to secure the planning obligations as detailed within the committee report.
- (2) The conditions and informatics, as set out in the committee report, together with:
  - A revision to the privacy condition for Block E (condition 19) to also require privacy screening to the south-eastern edge of the balcony for flat 05 on the first and second floor of Block E (denoted as flat E-01-05 within drawing HKG-BPTW-B04-ZZ-DR-A-1015 Rev C02) and to require the south-east facing window of the Living/Kitchen/Dining room of this flat to be obscure glazed and non-opening (up to a height of 1.7 m) in order to prevent overlooking and loss of privacy of the neighbouring properties.
  - A recommendation for the developers to engage and collaborate closely with ward councillors and resident associations to manage construction impacts.

(Voting on the above decision was unanimous)

## 4. Any Other Business

There was no other urgent business.

The meeting closed at 7.26 pm

COUNCILLOR KELCHER  
Chair

## APPLICATIONS FOR DECISION

### Introduction

1. In this part of the agenda are reports on planning applications for determination by the committee.
2. Although the reports are set out in a particular order on the agenda, the Chair may reorder the agenda on the night. Therefore, if you wish to be present for a particular application, you need to be at the meeting from the beginning.
3. The following information and advice only applies to reports in this part of the agenda.

### Material planning considerations

4. The Committee is required to consider planning applications against the development plan and other material planning considerations. The development plan policies and material planning considerations that are relevant to the application are discussed within the report for the specific application
5. Decisions must be taken in accordance with section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004. Section 70(2) of the Town and Country Planning Act 1990 requires the Committee to have regard to the provisions of the Development Plan, so far as material to the application; any local finance considerations, so far as material to the application; and any other material considerations. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the Committee to make its determination in accordance with the Development Plan unless material planning considerations support a different decision being taken.
6. Under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development which affects listed buildings or their settings, the local planning authority must have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest it possesses.
7. Under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development which affects a conservation area, the local planning authority must pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area.
8. Under Section 197 of the Town and Country Planning Act 1990, in considering whether to grant planning permission for any development, the local planning authority must ensure, whenever it is appropriate, that adequate provision is made, by the imposition of conditions, for the preservation or planting of trees.
9. In accordance with Article 35 of the Development Management Procedure Order 2015, Members are invited to agree the recommendations set out in the reports, which have been made on the basis of the analysis of the scheme set out in each report. This analysis has been undertaken on the balance of the policies and any other material considerations set out in the individual reports.

10. Members are reminded that other areas of legislation cover many aspects of the development process and therefore do not need to be considered as part of determining a planning application. The most common examples are:
  - **Building Regulations** deal with structural integrity of buildings, the physical performance of buildings in terms of their consumption of energy, means of escape in case of fire, access to buildings by the Fire Brigade to fight fires etc.
  - Works within the highway are controlled by **Highways Legislation**.
  - **Environmental Health** covers a range of issues including public nuisance, food safety, licensing, pollution control etc.
  - Works on or close to the boundary are covered by the **Party Wall Act**.
  - **Covenants and private rights** over land are enforced separately from planning and should not be taken into account.

### **Provision of infrastructure**

11. The Community Infrastructure Levy (CIL) is a charge levied on floor space arising from development in order to fund infrastructure that is needed to support development in an area. Brent CIL was formally introduced from 1 July 2013.
12. The Council has an ambitious programme of capital expenditure, and CIL will be used to fund, in part or full, some of these items, which are linked to the Infrastructure Delivery Plan (IDP).
13. Currently the types of infrastructure/specific infrastructure projects which CIL funds can be found in the Regulation 123 List.
14. The Regulation 123 list sets out that the London Borough of Brent intends to fund either in whole or in part the provision, improvement, replacement, operation or maintenance of new and existing:
  - public realm infrastructure, including town centre improvement projects and street trees;
  - roads and other transport facilities;
  - schools and other educational facilities;
  - parks, open space, and sporting and recreational facilities;
  - community & cultural infrastructure;
  - medical facilities;
  - renewable energy and sustainability infrastructure; and
  - flood defences,except unless the need for specific infrastructure contributions is identified in the S106 Planning Obligations Supplementary Planning Document or where section 106 arrangements will continue to apply if the infrastructure is required to make the development acceptable in planning terms.
15. We are also a collecting authority for the Mayor of London's CIL 'Mayoral CIL' which was introduced from 1 April 2012 to help finance Crossrail, the major

new rail link that will connect central London to Reading and Heathrow in the West and Shenfield and Abbey Wood in the East.

16. In February 2019 the Mayor adopted a new charging schedule (MCIL2). MCIL2 came into effect on 1 April 2019 and superseded MCIL1. MCIL2 will be used to fund Crossrail 1 (the Elizabeth Line) and Crossrail 2.
17. For more information:  
Brent CIL: <https://www.brent.gov.uk/services-for-residents/planning-and-building-control/planning-policy/community-infrastructure-levy-cil/>  
Mayoral CIL: <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/mayoral-community-infrastructure-levy>
18. Other forms of necessary infrastructure (as defined in the CIL Regulations) and any mitigation of the development that is necessary will be secured through a section 106 agreement. Where these are necessary, it will be explained and specified in the agenda reports

#### **Further information**

19. Members are informed that any relevant material received since the publication of this part of the agenda, concerning items on it, will be reported to the Committee in the Supplementary Report.

#### **Public speaking**

20. The Council's Constitution allows for public speaking on these items in accordance with the Constitution and the Chair's discretion.

#### **Recommendation**

21. The Committee to take any decisions recommended in the attached report(s).

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## COMMITTEE REPORT

Planning Committee on

11 February, 2026

Item No

04

Case Number

25/0041

## SITE INFORMATION

RECEIVED	7 January, 2025
WARD	Queens Park
PLANNING AREA	Brent Connects Harlesden
LOCATION	Little Trainers Playgroup and Hazel Road Community Centre, 26 Hazel Road and Harriet Tubman House, 28 Hazel Road, London, NW10 5PP
PROPOSAL	Demolition of all existing buildings and structures and erection of 4 storey mixed-use building comprising of training centre and community hall uses (Use Classes F1/F2), with roof and rear first floor terraces, associated cycle parking, refuse storage, landscaping and all other associated and ancillary works.
PLAN NO'S	See condition 2
LINK TO DOCUMENTS ASSOCIATED WITH THIS PLANNING APPLICATION	<p><u><a href="#">When viewing this on an Electronic Device</a></u></p> <p><b>Please click on the link below to view <u>ALL</u> document associated to case</b></p> <p><u><a href="https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&amp;keyVal=DCAPR_171575">https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&amp;keyVal=DCAPR_171575</a></u></p> <p><u><a href="#">When viewing this as an Hard Copy</a></u></p> <p><b>Please use the following steps</b></p> <ol style="list-style-type: none"><li>1. Please go to <u><a href="https://pa.brent.gov.uk">pa.brent.gov.uk</a></u></li><li>2. Select Planning and conduct a search tying "25/0041" (i.e. Case Reference) into the search Box</li><li>3. Click on "View Documents" tab</li></ol>

## **RECOMMENDATIONS**

That the Committee resolve to GRANT planning permission subject to completion of a legal agreement to secure the following planning obligations:

1. Payment of the Council's legal and other professional costs in (a) preparing and completing the agreement and (b) monitoring and enforcing its performance.
2. Notification of material start 28 days prior to commencement.
3. Detailed design stage energy assessment:  
(a) Initial carbon offset payment (approx. £3,924.50) to be paid prior to material start if zero-carbon target not achieved on site.  
(b) Post-construction energy assessment. Final carbon offset payment (approx. £3,924.50) upon completion of development if zero-carbon target not achieved on site.  
(c) 'Be seen' energy performance monitoring and reporting
4. Biodiversity Net Gain including Habitat Management and Monitoring Plan (HMMP) for on site BNG, provision of off site habitat units
5. Contribution of £3000 for off street tree planting within the vicinity of the site
6. Indexation of contributions in line with inflation (to be indexed from date of Planning Committee resolution)
7. Any other planning obligation(s) considered necessary by the Head of Planning.

That the Head of Planning or other duly authorised person is delegated authority to negotiate the legal agreement indicated above.

That the Head of Planning or other duly authorised person is delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

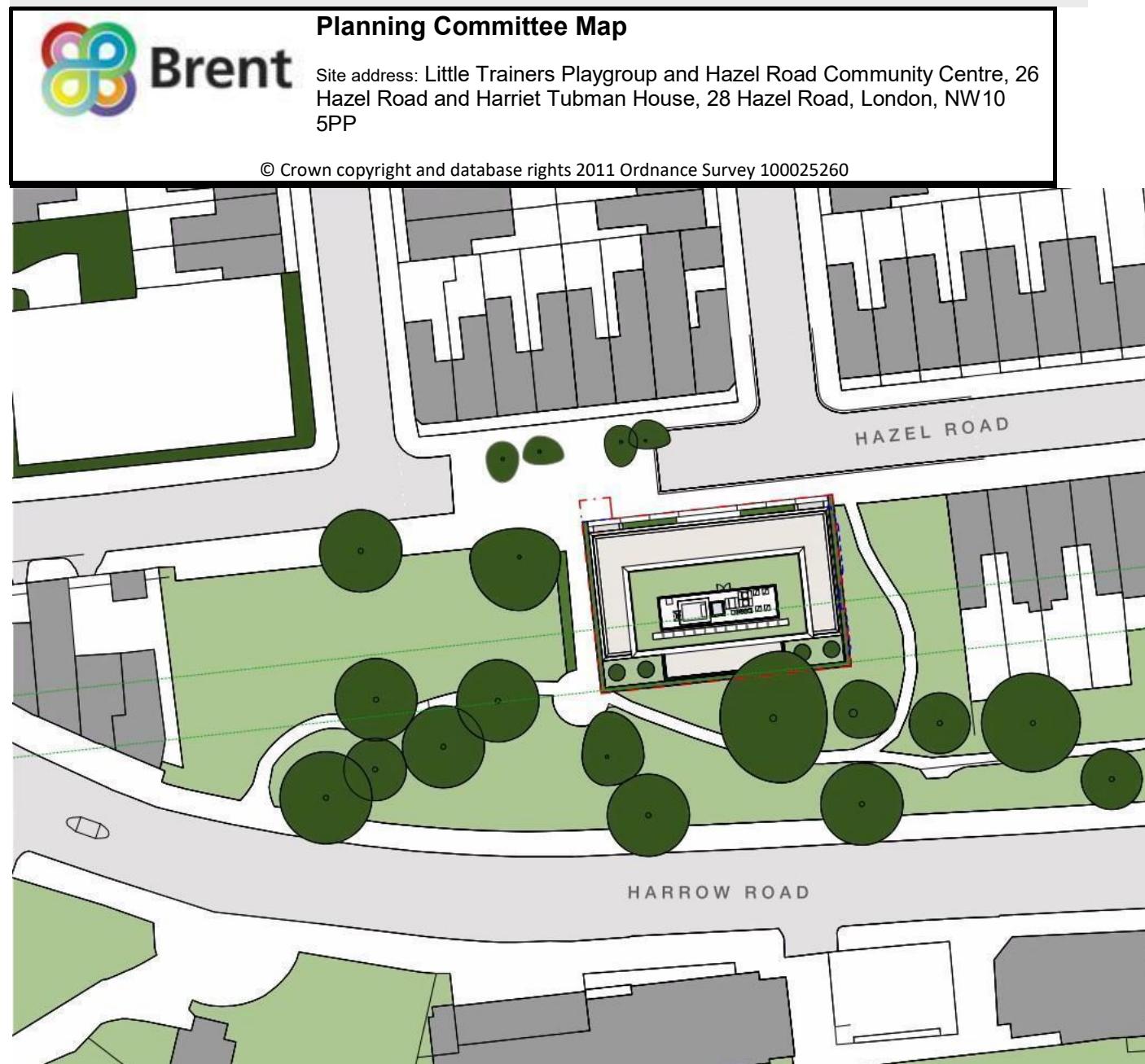
1. 3 year time period for commencement
2. Approved drawings
3. Use Class Restriction
4. Compliance with Travel Plan measures
5. Compliance with tree protection plan and Arboricultural Method Statement
6. Written Scheme of Investigation for heritage
7. Heritage Mitigation measures
8. Construction Logistics Plan
9. Construction Management Plan
10. Construction Environmental Management Plan
11. Further bat surveys
12. TFL infrastructure
13. Sustainable drainage measures
14. Contaminated land – site investigation
15. Contaminated land – remediation and verification
16. Piling Method Statement
17. External Materials
18. Cycle parking
19. Hard and soft landscaping
20. Wildlife nesting features
21. Delivery and servicing plan
22. Community access plan
23. External lighting
24. Plant Noise
25. BREEAM
26. Site management plan
27. Vibration condition
28. Internal noise insulation

## Informatics

As set out within decision notice.

That the Head of Planning or other duly authorised person is delegated authority to make changes to the wording of the committee's decision (such as to delete, vary or add conditions, informative, planning obligations or reasons for the decision) prior to the decision being actioned, provided that the Head of Planning is satisfied that any such changes could not reasonably be regarded as deviating from the overall principle of the decision reached by the committee nor that such change(s) could reasonably have led to a different decision having been reached by the committee.

## SITE MAP



This map is indicative only.

## PROPOSAL IN DETAIL

Demolition of all existing buildings and structures and erection of 4 storey mixed-use building comprising of training centre and community hall uses (Use Classes F1/F2), with roof and rear first floor terraces, associated cycle parking, refuse storage, landscaping and other associated and ancillary works.

## EXISTING

The site contains two, separate two-storey buildings located on the southern side of Hazel Road. Harriet Tubman House is the original Victorian building, which contains the existing 'Making the Leap' charity training and office accommodation. The second building, built in the early 2000s, contains the community spaces and ancillary functions. The buildings operate separately.

The site is not located in a conservation area nor does it contain any statutory or locally listed buildings. Nevertheless it is considered to be a non-designated heritage asset as it contains a Victorian building which has period features that make a positive contribution to the streetscene and thus is defined as a non-designated heritage asset.

## AMENDMENTS SINCE SUBMISSION

A revised heritage statement, transport statement, travel plan and demolition and construction management plan have been received during which have superseded the original documents submitted as part of the application. An additional drainage note comment has also been provided. These are considered in the main body of the committee report.

## SUMMARY OF KEY ISSUES

### Summary of key issues

The key planning issues for Members to consider are set out below. Members will have to balance all of the planning issues and objectives when making a decision on the application.

**Representations received:** 134 letters of objection were received and 10 in support comments were also received. Further details of the comments received are discussed within the "consultation section" below.

**Principle of development (land use):** The principle of the demolition of the existing community buildings to provide a new community building which would be flexible in accommodating a wider range of community facilities is accepted and would address a local need for such infrastructure.

**Heritage impact:** The proposal would result in the demolition of the existing buildings on site which would result in the loss of a non-designated heritage asset (Harriet Tubman House) which is considered of low to medium significance. However it is considered that the public benefits of the proposed enhanced community infrastructure to the benefit of local community groups would outweigh the harm caused by the loss of the non-designated heritage asset. Kensal Green Cemetery Conservation Area which lies marginally south of the site. The cemetery is also a Grade I listed Registered Park and Garden. There are a large number of listed structures contained within the cemetery, ranging from Grade II to Grade I listed. There is also a Grade II listed trough that lies just south of the site, outside the boundaries of the conservation area. The proposal is not considered to result in harm to the setting of these designated heritage assets.

**Design:** The proposed new building, while appearing of a greater bulk and massing, would retain a sense of openness with the Hazel Road open space to the rear of the site and would not appear out of character with wider surrounding development which contains a mix of 2-4 storey development. The buildings have been designed to sit comfortably in the context of those immediately surrounding the site and the wider context. The proposal consists of a high quality contemporary design which would make use of sustainable materials and would enhance both the visual amenity and safety of the site and surrounding Hazel Road open space.

**Impact on neighbouring properties:** The development would have some impact on neighbouring

properties, in terms of daylight as there would be some slight shortfalls against BRE guidelines to some existing residential units within 27-31 Hazel Road. However, it is considered that the impact is of a scale and nature that could be accepted in a dense urban area such as this. Overall the benefits of the proposal are considered to outweigh these impacts.

**Landscape, trees, biodiversity and urban greening:** It has been demonstrated the proposal would result in a measurable biodiversity net gain (+10%) as a result of the development and once the landscaping proposals have been implemented. No negative ecological effects are considered likely either, having taken into account of the adjacent SNICs, subject to conditions relating to bat surveys and a construction environmental management plan. The Urban Greening Factor of 0.28 which is slightly below the target of 0.3. the development will lead to positive biodiversity and green infrastructure outcomes when compared to the current baseline conditions.

**Sustainability:** The development is estimated to exceed the target 35% carbon reduction in regulated CO2 emissions, measured against 2021 Building Regulations, which would be derived from energy efficiency / demand reduction measures, as well as through renewable energy technologies proposed in the form of air source heat pumps and solar PV panels. A BREEAM 'Excellent' rating is also being targeted for all non-residential elements (including building A which contains the co-living units). A contribution to Brent's carbon-offsetting fund would be secured through the s106 agreement, to offset residual emissions to net zero.

**Transport:** The proposal would be car-free and would provide sufficient cycle storage for future users of the building, with full details to be secured condition. The submitted Transport Statement confirms that existing trip generation would be limited and would not have a noticeable impact on the local highway network. Further details of construction management and servicing will be secured by condition.

## RELEVANT SITE HISTORY

None

## CONSULTATIONS

### Public consultation responses

Public consultation was initially carried out on 16th January 2025 with 55 addresses sent consultation letters on the proposal.

Subsequent re-consultation was carried out on 10th June 2025 highlighting that a revised heritage statement was submitted. This second round of consultation was sent to a total of 184 persons either by post or email, to those originally consulted on 16th January 2025 and other persons who commented on the application.

A final round of consultation was carried out on 1st August 2025. This consultation highlighted that the address of the application site was amended to include all addresses within the application site (Little Trainers Playgroup and Hazel Road Community Centre, 26 Hazel Road and Harriet Tubman House, 28 Hazel Road, London, NW10 5PP rather than just Harriet Tubman House, 28 Hazel Road, London, NW10 5PP). This consultation letter was sent to 188 persons either by post or email, to those originally consulted on 16th January 2025 and other persons who previously commented on the application.

An initial site notice was also placed up outside of the application site on the 22.01.2025, an initial press notice on the 23.01.2025 and a further site notice was placed up outside of the application site on the 06.08.2025 in tandem with a further public consultation following the publication of a revised heritage statement and an amendment to update the site address. A revised press notice was also issued for the application on the 14.08.2025 .

In total, 134 objections have been received including an objection from Councillors Crabb, Nerva and Smith and Kensal Green Residents Association while a total of 10 in support comments have been received. 2 comments have been received which neither oppose nor support the application. It should be noted that in some cases those submitting representations provided more than one set of comments, however, where this has been the case each set of additional comments received is not treated as an additional objection.

A summary of the concerns raised to the proposal are set out below.

Reasons for objecting	Officer Comment
Scale, Massing and Heritage Impact- increased height and bulk would be overly dominant. Contemporary design would appear at odds/harm character of historic surroundings and heritage assets.	This is assessed in detail in the 'Demolition of Existing Building and heritage impact' section of this report.
The heritage significance of the existing building has not been fully considered.	This has been discussed in detail within the 'Demolition of Existing Building and heritage impact' section of this report. Brent's heritage officer has carried out a scoring exercise on the significance of the heritage asset and this is discussed in detail below.
Proposal would result in substantial harm to the heritage asset and the public benefits do not outweigh the harm.	It is recognised that the proposal would result in substantial harm to the heritage asset as a result of its demolition. However officers consider when considering the application as a whole that the harm is outweighed by the public benefits. This is discussed in detail within the report below.
Lack of detailed archaeological assessment.	The site does not lie in an archaeological priority area and is not in a site of archaeological importance. The Greater London Archaeological Advisory Service (GLASS) have reviewed the proposal and advised that the scheme is unlikely to effect any heritage aspect of archaeological importance and did not request any further information or conditions.
Loss of daylight/sunlight/overshadowing.	This is assessed in detail in the 'Impact on neighbouring amenities' section of this report.
Significant loss of dedicated community hall. Alternative sites are less accessible and secondary to their main training use.	The proposal would result in an enhanced community infrastructure facility and the applicant has agreed to a community use agreement to provide further details of the pricing, hours of use of the community hall to ensure that this facility offers similar availability to the existing.
Should renovate existing building instead/existing building not used to full capacity.	This is addressed in the 'principle of development' section of this report. The planning application can only consider the proposal as submitted and not alternative options such as retention and renovation.
The visual impact on the cemetery's landscape setting has not been fully assessed.	An assessment of this impact is made in the 'Demolition of Existing Building and heritage impact' section of this report.
Development fails to meet the London Plan Policy G5 target for Urban Greening Factor of 0.3. No justification for removal of T7 tree.	This is assessed further in the 'Urban Greening' and 'trees' section of this report.
Would add to traffic and parking stress- existing road has limited capacity for proposed use.	See the 'highways' section of this report for further assessment.
Lack of disabled parking spaces, disadvantaging users with mobility issue.	The Proposed Development will be car-free with no accessible car parking as per the current situation. However, there is provision for blue badge holders to be able to park on street in local permit holder bays for up to 3 hours stay for free. See the 'highways' section of this report for further assessment.
Loss of privacy/overlooking including to children's area in Hazel Road open space.	This is assessed in detail in the 'Impact on neighbouring amenities' section of this report.  Opportunities to provide more natural surveillance onto Hazel Road open space would be considered to enhance safety to the open space.
Increased noise and disruption.	The council's Environmental Health team have reviewed the submitted noise impact assessment and judges that the reasonable use of the premises would

	result in acceptable levels of noise impact to neighbouring amenities. Assessment is made in the 'impact on neighbouring amenities' section of this report.
Stress on local resident parking.	This is assessed in the 'Highways' section of the report.
Adverse impact to the Hazel Road open space.	The proposal would create more overlooking opportunities into the open space which would discourage anti-social behaviour/crime thus creating a safer environment. The proposal would include good quality landscaping which would be sympathetic to the verdant character of the open space.
Insufficient community consultation by applicant.	The applicant has carried out a statement of community involvement including in-person sessions held with members of the local community to inform/engage with them about the proposed development, as required.
Concerns with long-term management of building. May be sold-off to developers to change from community use to other use. Site could be left vacant. No guarantee of employment for locals.	Planning permission would be required for a change the use of the building into a non F1/F2 use. Applicant has agreed to provide a community use agreement which will give more detail on long-term management of facilities. It is recommended for this to be secured by condition.  There is no requirement for a scheme of this size to be subject to an employment and training plan in relation to construction or operational jobs. However, the replacement building would provide a modern community facility which would have associated employment opportunities to allow it to operate.
Loss of green space	The proposal would sit on the same sized plot as the existing so the surrounding green space would be retained and enhanced given the addition of soft landscaping connecting to the open space, which would be significant improvement on the existing situation.
Environmental impact- such as release of embodied carbon	This is addressed in both the 'Design, visual appearance and impact on street scene character' and the 'Energy and sustainable design' section of this report where it is considered that the proposed design is sustainable and using good measures to reduce carbon emittance.
Address of the application site incorrect on consultation documents	This is noted and was addressed. Re-consultation was carried out on the full site address.
Concerns with potential damage to Network Rail infrastructure beneath the site	The applicant has submitted a Basic Asset Protection Assessment (BAPA) which recognises the railway infrastructure beneath the application site and demonstrates how potential damage to this infrastructure can be mitigated. This has been reviewed by Network Rail's Asset Protection team who have no objection to the BAPA. Subsequently, Network Rail have removed their objection to the subject planning application.
Failure to re-consult on updated planning documents	Consultation was carried out on the application on three occasions as summarised above.
Planning officers being bias and pre-determining application Planning officers being bias and pre-determining application	All planning applications are required to be determined in accordance with planning policies set out within the development plan, unless material considerations indicate otherwise. The assessment of the planning application would also consider any comments received from the public or internal/external consultees, when forming a recommendation on a proposal. The concerns raised in particular focus on the heritage statement. A full assessment of the heritage of the site

	including the heritage statement and Alternative Heritage Statement submitted by an objector are discussed below.
Harm caused to use and operation of open space and playground spaces during construction	A condition will be added to secure a Construction Ecological Management Plan setting out how the construction process will be managed to protect the existing ecology of the site and off-site receptors. A revised construction coordination plan will provide further details of measures to mitigate against harm to open space and neighbouring amenities. Any constructions works that affect the open space i.e. a construction compound would need separate consent from Brent's Park Team.
Lack of need for offices	Office and training space is for community use consistent and is considered necessary for the charities aims to educate and train young people for employment.

The representations in support of the application state the following:

- Building will be of good quality, and its development will lead to a reduction of loitering in the children's park and park area behind.
- Any new building that offers community space built to the latest codes would only improve the neighbourhood.
- Having a modern building with windows overlooking the playground will provide that missing connection and improve the character and safety of the open space.

#### External Consultation

**Thames Water** – no objections. Informative and conditions added regarding water and waste management.

**TFL (spatial planning and infrastructure protection)** – no objections in regard to infrastructure protection subject to conditions and also a condition recommended in relation to cycle parking to meet requirements.

**Network Rail** – An objection was originally received due to the potential for the proposals to impact and potentially damage railway tunnel(s). Additional information was sent to the Asset Protection Team. Following receipt of the information Network Rail confirmed that they no longer wished to object to the proposal.

**Cadent gas** – No objection.

**Local Lead Flood Authority** – The LLFA have provided comment to state that as the site does not lie within land liable to surface water flooding and therefore is at low risk from this type of flooding, details of the Sustainable Drainage Strategy can be conditioned.

**Greater London Archaeological Advisory Service (GLASS)** – Proposal unlikely to have a significant effect on heritage assets of archaeological interest. No further assessment or conditions are therefore necessary.

#### Internal consultee responses

**Environmental health** - no objections. Conditions added requiring additional land contamination investigation and a site operational management plan to ensure measures are in place to prevent noise and disturbance. Construction management plan to be secured by condition.

## **POLICY CONSIDERATIONS**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of this application should be in accordance with the development plan unless material considerations indicate otherwise.

The development plan is comprised of the:

Key policies of the London Plan include:

D3: Optimising site capacity through the design-led approach  
D12b: Fire Safety  
D4: Delivering good design  
D5: Inclusive design  
D12: Fire Safety  
S1: Developing London's Social Infrastructure  
HC1: Heritage conservation and growth  
G5: Urban greening  
G7: Trees and woodlands  
SI1: Improving air Quality  
SI 2: Minimising greenhouse gas emissions  
SI 13: Sustainable drainage  
T5: Cycling  
T6: Car parking

Key policies of the Brent Local Plan 2019-2041 include:

DMP1: Development Management General Policy  
BD1: Leading the way in good design  
BSI1: Social Infrastructure & Community Facilities  
BHC1: Brent's Heritage Assets  
BGI1: Green and Blue Infrastructure  
BGI2: Trees and Woodlands  
BSUI1: Creating A Resilient and Efficient Brent  
BSUI2: Air Quality  
BSUI3: Managing Flood Risk  
BSUI4: On Site Water Management and Surface Water Attenuation  
BT1: Sustainable Travel Choice  
BT2: Parking and Car Free Development  
BT3: Freight and Servicing

Other material considerations include:

National Planning Policy Framework  
National Planning Practice Guidance

Supplementary Planning Documents

Council's Sustainable Environment & Development SPD June 2023  
Council's Supplementary Planning Document 1 'Brent's Design Guide' 2018

## **DETAILED CONSIDERATIONS**

### Principle of development (Land Use)

1. The application site contains Harriet Tubman House which contains an education and training facility together with the more recently built community space at Hazel Road Community Centre. The application is proposing to demolish both of these buildings and is seeking to expand and improve the community offer to be more flexible and adaptable to meet the on-going needs of local residents through a new purpose-built building. It would contain an enhanced training centre with a training room and training workspace, job search and IT rooms, a third-floor social hub and roof terrace together with ancillary support offices for the applicant's employees. A new community hall would also be proposed. A summary of the existing and proposed floorspace of the various uses is set out below:

Use	Existing GIA 9sqm)	Proposed GIA (sqm)
Training Centre (Class F1)	529	1,240
Community Hall (Class F2)	247	115

Ancillary Spaces and Back of House	6	95
Total	782	1,448

2. Policy BSI1 of the local plan states that for proposals for new or enhanced social infrastructure facilities, including the consolidation of existing facilities, will be supported by the Council where:
  - e) *easily accessible by public transport, walking and cycling, preferably in town centres or Growth Areas;*
  3. In relation to part 'e', while the site is in a PTAL 3 zone which indicates a moderate public transport accessibility, it is located close to Kensal Green London overground and underground station and several bus stops and routes along Harrow Road. In this instance, it is considered that the location for the intensified use is acceptable.
  - f) *located within the community they are intended to serve;*
  4. The existing community use has existed for a period of more than 20 years in this location, where they work with local residents. This is a part of the borough which experiences high levels of deprivation and inequality and associated negative social impacts. The charity works to improve the life chances of those impacted by deprivation and inequality and is therefore well placed to meet local needs.
  - g) *provided in flexible and adaptable buildings;*
  5. The existing building is proposed to be redeveloped due to its lack of flexibility. The new building comprising timber load bearing as opposed to brick will be a vast improvement over the existing layout, allowing for open plan arrangements with partitions which can be easily removed to provide for alternative layouts. The space can therefore provide for a range of activities to take place, ensuring that the changing needs of the local residents and community organisations are met going forward.
  - h) *ideally co-located with other social infrastructure uses;*
  6. The building is designed to reflect changing operational requirements. The scheme would contain a new community hall located on the ground floor of the proposed development with its own separate entrance from the main Making the Leap entrance. Whilst the floorspace of the new community centre would be less than existing, the spaces within the main building would also be available to book/hire by the local community such as the use of the training room or IT room, the social hub and the third floor social hub and roof terrace. This includes the needs of Making the Leap but also providing more good quality space for other community groups who will be given access to the building. The space will therefore operate as a local hub for community activity and will not be the sole preserve of one user which is welcomed and supported by this policy requirement.
  - i) *maximising wider community benefit, through if necessary, requiring formal community use agreements.*
  7. As identified above, Making the Leap use their existing premises flexibly, including as part of their business model renting their spaces out to other community groups. The organisation is therefore actively ensuring the space is utilised effectively for a range of community uses. However, Making the Leap has also agreed to capture this through a Community Use Agreement (CUA) to be secured by condition. This gives greater certainty that such opportunities will endure and are not dependent on an ethos/ model that could be subject to change, either by Making the Leap or any other principal occupier of the premises in the future.

#### Summary

8. The redevelopment of the site is supported in principle in land use terms and would be compliant with policy BSI1 of the Local Plan. It will result in an expanded and improved community offer which is more flexible and adaptable to meet the on-going needs of local residents.

#### Demolition of Existing Building and heritage impact

9. Policy BHC1 sets out that proposal for or affecting heritage assets should:

- a) demonstrate a clear understanding of the archaeological, architectural or historic significance and its wider context;
- b) provide a detailed analysis and justification of the potential impact (including incremental and cumulative) of the development on the heritage asset and its context as well as any public benefit;
- c) sustain or enhance the significance of the heritage asset, its curtilage and setting, respecting and reinforcing the streetscene, frontages, views, vistas, street patterns, building line, siting, design, height, plot and planform and ensure that extensions are not overly dominating;
- d) contribute to local distinctiveness, built form, character and scale of heritage assets by good quality, contextual, subordinate design, and the use of appropriate materials and expertise, and improving public understanding and appreciation;
- e) seek to avoid harm in the first instance. Substantial harm or loss should be exceptional, especially where the asset is of high significance. Any proposed harm to or loss of a heritage asset (including to its setting) should require clear and convincing justification and can be outweighed by material planning considerations in the form of public benefits but only if these are sufficiently powerful.
- f) where demolition is proposed detailed plans for any replacement building will be required to allow consideration of whether the replacement would contribute positively to the character or will be applied to ensure construction of the approved scheme is implemented together with agreed mitigation measures appearance of the area. In cases where demolition is permitted conditions and/or legal agreements will be applied to ensure construction of the approved scheme is implemented together with agreed mitigation measures.

10. The second edition of Historic England's Advice Note on 'Identifying and Conserving Local Heritage' (HEAN7) establishes what is a non-designated heritage asset (NDHA) and how they are initially identified. NDHAs are:

"locally-identified buildings, monuments, sites, places, areas or landscapes identified by plan making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets [...]

11. Non-designated heritage assets can be identified in a number of ways, including:

- Local heritage lists
- Local and Neighbourhood Plans
- Conservation area appraisals and reviews
- Decision-making on planning applications."

12. Paragraph 208 of the NPPF states that:

"Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal."

13. Paragraph 218 of the NPPF states that:

"Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted."

- 14. Paragraph 207 of the NPPF highlights that when determining application, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.
- 15. Paragraph 216 of the NPPF highlights that the effect of an application on the significance of a non-designated heritage asset should be considered in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 16. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. Regarding listed buildings, all planning decisions should "have

special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses" and regarding conservation areas special attention must be paid to "the desirability of preserving or enhancing the character or appearance of that area".

#### Significance of the non-designated heritage asset

17. Harriet Tubman House is a former community centre located on Hazel Road, within an area of broadly mid-to-late 19C townscape. It is located approximately fifty metres to the North of the Kensal Green (All Souls) Cemetery Registered Park and Garden (categorised at Grade I). It was built as an Anglican mission hall in a practical late Victorian ecclesiastical style in 1899, to the designs of an unknown architect. It was opened in 1900 as the "St Martin's Institute & Mission Hall" and continued in ecclesiastic use for around a quarter of a century. The building has had a number of other uses during the past century.
18. Harriet Tubman House was identified in 2016 as a possible addition to the local list and is considered to be a non-designated heritage asset. It must be emphasised that, following LB Brent's 2016 round of the local list review process, that the site building was not locally listed, as it was not considered to have reached the necessary threshold for local listing. The criteria for local listing in LB Brent are also less stringent and discriminating than the criteria that buildings are considered against for statutory designation and entry onto the National Heritage List for England. Considering this, it is evident that the preservation of Harriet Tubman House (and its significance) should carry less weight in decision-making than if it was statutorily listed or even locally listed. This position is in line with the spirit of both built heritage legislation and planning policy.
19. When considering the scoring of a buildings suitability to be included in the local list of heritage assets, the significance scoring is based on 4 factors including a building's authenticity, architectural interest, historic/archaeological interest and townscape interest. Each of these factors can provide a building with up to 3 points. Once a building has been assessed against these four criteria, it is categorised into one of three brackets. Buildings that score 0-5 points are considered to have a low level of local heritage significance, those with 6-8 points have a medium level of local heritage significance, and those with 9-12 points have a high level of local heritage significance. Most historic buildings that go through this formal process and come out with a medium or high level of local heritage significance are added to LB Brent's local list of heritage assets. Brent Council will also, in some cases, consider other strategic planning priorities
20. The heritage statement (as revised) has been included with the application as advised by NPPF Paragraph 207. It recognises the building as a non-designated heritage asset, and this is also recognised by Brent's heritage officer. The Heritage Statement describes its heritage significance:

*'Both the exterior and the interior of the building have been altered over time, but it retains some architectural interest for its late 19th century high Victorian appearance, with alternating brick patterns, gothic style window openings and gables. It also has some historic interest as a mission hall. The degree of architectural and historic interest that can be attributed to the building is limited by the numerous changes and additions over the years. Detracting elements include the unsympathetic rendered gables and east elevation. The metal plates fixed to the elevations also reduce its architectural coherency. The late 20th century extension to the west is an unsympathetic feature and blurs any significance that the plan form of the building may be considered to have, further detracting from the architectural interest of the building. The building's setting is generally poor.'*

21. The revised heritage statement has used Brent's formula for assessing the significance of buildings for its local list. The revised heritage statement concludes that the building would have a low-medium significance, due to its:
  - "Altered gables and rendered east elevation.
  - Disruptive later extension (early 2000s).
  - Lack of original architectural detailing internally.
  - Questionable associative significance (e.g., QPR link not manifested physically)."
22. It also recognises that the building may contain some modest local historic and communal value, obtained from its former use.
23. The criteria Brent Council uses to assess the suitability of buildings for addition to the LB Brent local list has circumstantial shortcomings. This is not to say that the criteria are not fit for their intended purpose.

The heritage statement writes:

*"While this system is used for Local Listing considerations, it lacks the contextual flexibility necessary for proportional assessment in planning terms, particularly where significance is already marginal and where extensive alteration has occurred."*

24. The revised heritage statement also recognises the Kensal Green Cemetery Conservation Area which lies marginally south of the site. The cemetery is also a Grade I listed Registered Park and Garden. There are a large number of listed structures contained within the cemetery, ranging from Grade II to Grade I listed. There is also a Grade II listed trough that lies just south of the site, outside the boundaries of the conservation area.
25. Objections have been received from the Kensal Green Residents Association (KGRA) and the Willesden Local History Society (WLHS) regarding the loss of the non-designated heritage asset, which they consider to be of historical significance. The WLHS have produced an alternative heritage statement, which is evidenced by thorough primary research and argues (as part of its statement of heritage significance) that the site's buildings should not be demolished as they consider it to reach LB Brent's threshold for local listing. This heritage statement has used Brent's criteria for assessing the significance of buildings for its local list. The WLHS's conclude within their alternative heritage statement that the building would score 9 out of 12, and they therefore consider the building to have a high level of significance in the terminology of LB Brent's local list criteria.
26. In response to this, the submitted revised heritage statement responds to the scoring as set out in the WLHS alternative heritage but rebuts this, stating that the alternative heritage statement does not acknowledge the cumulative impact of later unsympathetic additions, internal reconfigurations, and material degradation which all dilute the building's evidential, aesthetic, and communal value, as well as overstating the historic associations.
27. The alternative heritage statement recognises that while the building has retained some historic architectural interest, the value of the building has been degraded over time through multiple internal and external alterations. The applicants submitted statement states that:

*"The degree of architectural and historic interest that can be attributed to the building is limited by the numerous changes and additions over the years. Detracting elements include the unsympathetic rendered gables and east elevation. The metal plates fixed to the elevations also reduce its architectural coherency. The late 20th century extension to the west is an unsympathetic feature and blurs any significance that the plan form of the building may be considered to have, further detracting from the architectural interest of the building. The building's setting is generally poor. However, the building is still recognisable as a small hall and, although the alterations to the building have all had an adverse effect on it, this does not affect the ability to appreciate the significance of the building. The building may also be considered to possess some local historic and communal value."*

28. Officers have considered the representations relating to the historic significance from both the applicant and the WLHS together with their own views of the historic significance. It is considered that, while the site building has some features of architectural interest and some historical associations of note, it has not reached the required threshold for local listing. This is shown by the fact the site building has not been placed onto the list previously, despite consideration. It can also be evidenced by several exercises.
29. Firstly, an exercise in comparison is of use. If a comparison is made between the site building and other religious buildings and community spaces on LB Brent's local list of heritage assets, it underlines its modest level of heritage significance. There are several religious buildings on the list that are of an obviously higher level of architectural interest, historical/archaeological interest, townscape importance, and authenticity. These include the Church of St Catherine (which scored 8 out of 12), West Kilburn Baptist Church (11/12), 17 Heathfield Park (7/12), Shree Swaminarayan Temple (11/12), Wembley United Synagogue (9/12), the Iman Khloel Islamic Centre (11/12).
30. After studying the site's buildings, alongside the evidence provided by both the applicants and objectors, Brent's heritage officer also gone through the exercise of re-assessing the significance of the site building using the local list criteria. The table establishes the process used to arrive at their conclusion.

Local List Eligibility Assessment		
Category	Commentary	Score

Authenticity	A large proportion of the historic building's interior and exterior has been unsympathetically altered, limiting a visitor's ability to appreciate its local heritage significance.	1
Architectural Interest	<p>The site building's gables, ecclesiastical windows, and decorative brickwork, to Hazel Road have definite aesthetic appeal and show some level of good craftsmanship. Notwithstanding, the building's modern interior arrangement, and its heavily altered eastern, southern, and western elevations means that the building is assessed to be of only modest local architectural interest. There is no clear evidence of technical virtuosity or engineering innovation in the building's construction. There are several better preserved and more interesting mission hall buildings to be found across London. These include (but are not restricted to) the former Leysian Mission in Islington (Grade II listed), the Paget Memorial Mission Hall in Islington (Grade II listed), the Malvern College Mission Chapel in Newham (Grade II listed), and the Church of St Mary Mission Hall in Hackney (Grade II listed). Despite their national recognition as mission halls of special architectural and historic interest, a comparison with Harriet Tubman House shows that it can only be considered to possess a modest level of architectural interest for its type.</p>	1
Historical/Archaeological	<p>The building has played a long-term role as a community space in this part of Brent. During its 125-year history it has accommodated changing community needs alongside, both, Brent's rapid population growth and shifts in its local religiosity/secularism. This however is not uncommon (or special) as a large proportion of LB Brent is covered by 19C building stock with various historic uses.</p> <p>The building also deserves an additional point for its selection of loose historic associations. The mission's historic association with the Christchurch Rangers (later Queens Park Rangers) is one example.</p>	2
Townscape	The building's main elevation to Hazel Road is an attractive part of the streetscape. Notwithstanding, the building does not have the scale, architectural qualities,	1

	or disposition needed to be considered a landmark building or “townscape marker.”	
<b>Overall Score</b> (6 or more needed for local listing)	<b>5 out of 12</b>	

Assessment of harm and significance of heritage asset against benefits of the proposed scheme

31. The application proposals would involve the demolition of the existing site buildings and the construction of a 4-storey mixed-use building comprising of training centre and community hall uses. In heritage terms, this would lead to the loss of the existing buildings on site, including Harriet Tubman House, and therefore also its modest level of heritage significance.
32. The proposal would alter the existing character of the site. The overall scale and massing of the development would be larger than the existing building on the site and would have a contemporary materiality and appearance. The application proposals also have the potential to further change Hazel Road's residential character and could also affect the character of the wider mid-to-late 19C townscape which includes the nearby Church of St Martin which is a relevant aspect of the site building's setting.
33. The proposal would provide enhanced community infrastructure in comparison to the existing building which is more restricted given its limited size and convoluted internal layout. When assessing the merits of the proposed scheme, the submitted heritage statement explains that the asset has been heavily and unsympathetically altered internally and externally and its architectural interest has been much compromised, and therefore it is in very poor condition and no longer suited to its use.
34. It is considered that the building does retain some attractive elements such as decorative red brick gables featuring clay diaper work and it has local historic associations. However, alterations, such as inappropriate window additions, the modern entrance, the horizontal canopy, the rendered walls and the roller shutter are particularly unsympathetic and have adversely impacted on the ability of visitors to appreciate Harriet Tubman House's local architectural and historic interest.
35. In line with paragraph 216 of the NPPF, in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. The proposal would result in the total loss of the existing buildings on site and therefore would result in harm to the non-designated heritage asset.
36. It is noted some objections have also been received in relation to the impact of the proposal on the listed horses' trough and Kensal Green Cemetery Conservation Area, which lie to the south of the site. However, the proposal site is located approx. 35m away from the horse's trough separated by the open space and Harrow Road and approx. 50m from the cemetery, where views from the cemetery towards the application site would largely be obscured by surrounding development along Harrow Road. The proposal would not have a notable effect on the significance (or the ability to appreciate the significance) of the Kensal Green (All Souls) Cemetery Registered Park and Garden (Grade I) through setting effects. However, if one was to suggest that the potential implementation of the application proposals would lead to harm to the cemetery, this harm could only amount to a very low level of less than substantial harm.
37. It is necessary to balance the harm to the site's significance through its demolition with the proposed benefits of the scheme. The overall design of the new building and associated landscaping improvements would need to meet the economic, social and environmental objectives that underlie the NPPF's definition of sustainable development. The benefits of the proposal are set out in detail throughout the report and recognise the historic value of the site as a heritage asset. However, in summary the proposal would result in an enhanced learning centre and community building. The proposal would enhance the visual amenity of the site and wider locality including improving the visual amenity and usability of the Hazel Road open space to the rear of the site and would be of a high-quality contemporary design making use of good sustainable design principles to mitigate against its carbon impact. Therefore, it is considered that these public benefits clearly outweigh the harm regarding the loss of the non-designated heritage asset.
38. A condition is recommended to ensure that a thorough Level 2 building recording survey is undertaken before any demolition goes ahead. This would align with the content of Paragraph 218 of the NPPF. Any building recording survey should be completed by an experienced heritage professional. A building recording survey can be added to the publicly accessible Greater London Historic Environment Record
39. Overall, and when read in conjunction with other relevant sections of this report, the proposals would

accord with paras. 207-208 and 216 of the NPPF, and policies BHC1 of the Local Plan and HC1 of the London Plan.

### **Design, visual appearance and impact on street scene character**

#### **Policy background**

40. In design terms, policy DMP1 sets out the need for development proposals to be:

(a) of a location, use, concentration, siting, layout, scale, type, density, materials, detailing and design that provides high levels of internal and external amenity and complements the locality.

(f) safe, secure and reduces the potential for crime

41. Policy BD1 highlights the need for all new development must be of the highest architectural and urban design quality. Innovative contemporary design will be supported where it respects and complements historic character but is also fit for the future. In delivering high quality design, development proposals will be expected to show how they positively address all the relevant criteria within London Plan design policies and the Brent Design Guide SPD1.

#### **Scale bulk and massing**

42. The proposed replacement building would consist of four storeys with a recessed top-floor incorporating a flat-roof design, in comparison to the existing lower single storey pitched roof building. The proposal would have a similar width and depth to the existing however given its four-storey form, would appear as a more significant feature in its setting. However, the recession of the top-floor does help to prevent an overly bulky appearance.

43. It is noted that the site historically was built-up closer to two-storey buildings which have been demolished over time, meaning that the existing sits on a detached plot of land surrounded by trees and open space. Objections have noted that the wider locality predominately consists of a two-storey built-form, and that the proposal would appear out of character with this pattern of development.

44. However, it is also noted that there are some other four and five-storey buildings located to the south of the site along the southern side of Harrow Road. When considering this mixed character in this setting, it is considered that the proposed redevelopment provides a better opportunity to address these spaces positively, which is welcomed. The proposal would also retain the open character of the plot and vistas through to the Hazel Road open space to the rear of the site. Given the function of the building and its individual design it is not unusual to appear different to the surrounding residential buildings. The proposed, siting arrangement and massing is not considered to appear out of place and would be appropriate for a new community building.

45. As such the proposed bulk and massing is considered acceptable in this location.

#### **Materiality and secure design**

46. In terms of materiality, the proposal would appear as a more contemporary structure to the existing, constructed of a lightweight timber frame with a low embodied carbon structure, this has been designed in consideration to reducing the load bearing to the network rail lines beneath. The detailing of the proposed glazing at ground-floor level has been provided, illustrating the proposed ground-floor would be approx. 31% glazed with the remainder to be composed of solid wall.

47. The applicant has worked with the Metropolitan Police's secured by design department to create a design which aims to improve the safety and security of both the proposed building and the surrounding Hazel Road open space which is not well-overlooked currently and attracts anti-social behaviour. This includes the use of glass reinforced panelling will also be used to prevent graffiti, as well as glazing to all facades to increase the levels of overlooking/surveillance around the site. Furthermore, strips of defensive planting have also been added around the corner boundaries along the southern elevation of the building which also improve the visual amenity of the site and connectivity with the open space.

48. The proposed contemporary design is therefore considered as high quality and would comply with policy DMP1. Details of the sustainable design and how this meets the sustainability targets as well as urban greening are set out later in this report.

## **Impact on neighbouring amenities**

### **Daylight and sunlight impact and overshadowing**

49. Policy D6 (part D) of London Plan highlights the need for development to provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.
50. Policy DMP1 (g) states that development should not unacceptably increase, and where possible reduce, exposure to noise, and other forms of pollution and general disturbance.
51. Where buildings would be within a 25-degree line of existing windows, the Building Research Establishment considers that levels of light to these windows could be adversely affected and recommends further analysis of the impacts. A more detailed assessment of daylight and sunlight impacts based on the BRE's Site Layout Planning for Daylight and Sunlight (BRE209) 2022 guidance is required where the 25-degree test is not met.
52. The BRE Guidelines recommend two measures for daylight. Firstly, the Vertical Sky Component (VSC) assesses the proportion of visible sky that is visible to a specific point on the outside of a property, which is directly related to the amount of daylight that can be received. It is measured on the outside face of the external walls, usually at the centre point of a window. Secondly, the No Sky Contour or Daylight Distribution assesses the area of the room at desk height (850mm height from floor level) from which the sky can be seen.
53. The guidance suggests that the existing daylight may be noticeably affected by the new development if:
  - Windows achieve a VSC below 27% and are reduced to less than 0.8 times their former value; and / or
  - Levels of NSL within rooms are reduced to less than 0.8 times their former values.
54. To assess impacts on sunlight to existing south-facing windows and amenity spaces, assessment of Annual Probable Sunlight Hours (APSH) is recommended. The guidance sets a target for windows of 25% of total APSH including 5% in winter months for windows (WPSH), and for amenity spaces to receive at least two hours sunlight on 21 March and not less than 0.8 times their former value.
55. A daylight/sunlight impact assessment has been submitted as part of this application, in accordance with BR 209 (2022) guidelines. The assessment has been undertaken using the VSC, NSL, and APSH (sunlight) tests set out within the 'BRE Daylight and Sunlight Planning Guide (2022)'.
56. However, the BRE also recognises that different criteria for daylight and sunlight may be used in dense urban areas where the expectation of light and outlook would normally be lower than in suburban or rural areas and support the use of a 'mirror image' analysis in such cases. The NPPF 2024 also supports a flexible approach to applying standards to make efficient use of sites.
57. The closest residential properties to the application site are no's 23-31 Hazel Road to the north of the site across Hazel Road and which fall within a 25-degree angle to these neighbouring amenities. Concerns have been raised in the objections to the scheme regarding the impact to daylight and sunlight levels to these neighbouring amenities.

#### *23-25 Hazel Road - residential*

58. The results show that no's 23-25 Hazel Road would experience a reduction of VSC and NSL, and sunlight that is less than 0.8 times its former value. The occupants of these buildings are therefore unlikely to notice any reduction in daylight or sunlight, in accordance with the recommended BRE criteria.

#### *27 Hazel Road - residential*

59. In daylight terms, the results of the VSC daylight assessment show that all 6 front windows to this amenity met the BRE guidance, retaining over 0.8 times their former value.
60. While no floor plans are available for this site, the applicant has provided an NSL study nonetheless and works on the assumption that there is a living room at ground-floor and bedroom at first-floor level. In terms of NSL the living room at ground-floor level would experience an impact slightly beyond the

recommended criteria, with a reduction of 23.9% which is beyond the 0.8 times of its former value.

61. However, the level of retained daylight distribution is above 50% which is considered acceptable given the urban context of the area.
62. In terms of sunlight impact, the results show that although there would be some reductions in sunlight these would still be within the BRE guidelines criteria and the retained sunlight would be above the minimum required by the BRE guidelines.
63. Overall, while there would be some impact in terms of daylight, the level of harm is not considered to be unacceptable to this amenity given the retention of sufficient daylight distribution and when considering the urban context of the site where such reductions are typical.

#### *29 Hazel Road- religious property*

64. Similarly in terms of daylight, the VSC results show that all windows would comply with the BRE recommended criteria. In terms of NSL, the ground-floor room would experience a reduction of 40.3% while this would be beyond the 0.8 times its former value, the levels of daylight distribution would be 57% which is considered acceptable given the urban context of the site. Furthermore, given that the site is not in residential use the level of daylight reductions in this context is considered more acceptable.
65. In terms of sunlight impact, the results show that there would be some reductions in sunlight would still be within the BRE guidelines criteria and would be retained sunlight would be above the minimum required by the BRE guidelines.

#### *31 Hazel Road- residential*

66. In terms of the VSC assessment for daylight, all windows would meet the BRE guidelines. For NSL, both habitable rooms assessed would experience a higher percentage reduction beyond 0.8 times its former value (24 and 36.5% reduction), however both rooms would retain direct daylight distribution to more than 62% which is considered acceptable given the urban context. Furthermore, in sunlight terms, both rooms would be compliant with the recommended guidelines.

#### Summary

67. While the survey results demonstrate that there would be some harm to the amenities 27-31 Hazel Road, particularly in respect of daylight terms, the overall level of harm is considered negligible when considering the levels of daylight loss would not be significantly beyond the recommended guidelines and when also considering that these levels of light loss are not considered unusual given the urban context of the site. Furthermore, the windows most affected are south-facing windows which typically receive good levels of light throughout the day, and the proposal would have an acceptable impact in sunlight terms.

#### Privacy/overlooking impact and noise impact

68. Development should ensure a good level of privacy inside buildings and within private outdoor space. Directly facing habitable room windows will normally require a minimum separation distance of 18m, except where the existing character of the area varies from this. Reduced distances between new frontages may be acceptable subject to consideration of overlooking and privacy as well as high quality design and solutions which can sometimes mitigate impacts and allow for efficient use of land.
69. There is a distance of approx. 15.2m between the existing buildings and the properties on the opposite side of Hazel Road, which is broadly consistent along the street. A similar distance would be maintained in relation to the new building at ground to second floor level with the third floor set back further to maintain a distance of 19.6m between the buildings at this level. A roof terrace is proposed above third-floor level. The level of overlooking at ground to second floor level would not be considered to be any worse than existing and reflective of the character of development within the locality, despite being less than 18m between directly facing windows. Whilst there have been some concerns raised in relation to overlooking from the roof terrace, a distance of over 18m would be retained in line with the guidance set out within SPD1. In addition, the railing flats would be angled at 30 degrees towards the west, which would prevent direct overlooking.
70. Some concerns have been raised regarding the noise levels that could emit from the proposal, given the

intensified community use and added terrace. The proposal is supported by a Noise Impact Assessment ('NIA') prepared by Sharps Redmore which demonstrates that noise mitigation measures have been included in the design of the building such as thermal glazing and has suggested operational hours between 09:00-22:00. Following discussion with the Council's Noise Team, it is considered the potential impacts of noise and the use of the terrace would relate to the way in which the site operates and is managed. The proposed terrace would be relatively small and face the rear of the site, which limits its capacity and it would not be inherently harmful. Therefore, it is recommended that an operational management plan is agreed for the site by a condition to ensure that measures are in place to prevent the site from being inappropriately managed, and to prevent excessive noise or disturbance. These measures are considered sufficient to mitigate against significant noise impact from the proposed development and would be able to endure there is a well considered plan for managing the users for the site. Additionally, any undue levels of noise impact could also be managed and enforced by the council's environmental health team.

#### Overbearing impact and increased sense of enclosure

71. While the proposed bulk and massing would be more significant in comparison to the existing situation in respect of height, especially with the addition of the third floor element, the proposal would not extend closer to neighbouring windows between 27-31 Hazel Road (being the closest neighbouring sites) beyond the existing situation and there is already a substantial degree of separation between the proposal and these neighbouring amenities. Furthermore, the width of the building would remain similar as to the existing, which would mitigate against an increased sense of enclosure and ensure that the vistas towards Hazel Road to the rear would be maintained. The impact to neighbouring amenity in terms of daylight and sunlight have also been assessed above.

#### Transport considerations

##### Parking

72. Parking standards are given in Appendix 4 of the adopted Local Plan, which for a community centre allows a parking ratio of up to one space per ten persons. As the community building is proposed to increase in size, a Transport Statement has been provided to assess the likely impact on local transport networks. Table 5.1 provides a schedule of activities for the proposed site and the expected attendance number. This shows that during a typical week, approx. 30 adults are expected to attend the site per day, with 60 adults attending on Wednesday evening and a Saturday and 40 children and adults on a Sunday.
73. A travel survey was carried out on the existing site, with the results set out in the Appendix. A total of 53 visitors responded to the survey and Table 6.1 shows that 90.5% of the visitors travelled by public transport, 3.8% travelled by car and 5.7% travelled on foot.
74. Table 6.3 and 6.4 uses this survey data to predict the proposed site trip generation. This shows 55 arriving and 55 departing by public transport during the weekday evening (arriving 6-7pm & departing 10-11pm), with 61 arriving and 106 departing by public transport between 8am – 2pm on a weekend.
75. For the weekday evening period, this would translate to less than three additional passengers per train and less than one additional passenger per bus passing the site. Given that the peak impact is at off-peak times (evenings and weekends), the impact on public transport capacity is considered to be negligible.
76. The survey also showed that most visitors travel over two miles to get to the site. Two visitors drive alone to the site, with one parking within the nearby crematorium and the other on Hazel Road.
77. The survey results include visitors and staff, but it is unclear as to how staff travel to the site. With 40 full-time staff members proposed, this distinction would be useful. However, the CPZ operating in the area from 8.30am to 6.30pm on Mondays to Fridays and the absence of any off-street parking within the site does act as a natural deterrent to staff driving to the premises.

##### Parking survey

78. A parking beat survey was also carried on Wednesday 2nd October at 5am and 10pm, Thursday 4th October at 5am and Sunday 6th October at 9.30am. Table 6.4 shows the eight streets that were surveyed have a total parking stress between 72.2% - 79.2%.

79. Appendix F provides parking survey data for Wednesday evening (8pm) and Sunday morning (9.30am), which is when the centre is expected to be at its busiest. The survey indicates that College Road and Mortimer Road are heavily parked on both days, with Felixstowe Road also heavily parked on Sunday morning. Hazel Road and other nearby streets do have a lower parking stress below 80% though, so some spare on-street parking capacity is available to accommodate parking from the centre during its busiest times. With the travel survey indicating that very few visitors travel by car, the proposal is not considered to result in a detrimental impact on parking or highway conditions on surrounding streets.

80. The objections received to this application from local residents do suggest that streets in the area do suffer from high parking pressures. However, none of the objections provide evidence to demonstrate that the centre currently contributes to the excessive parking pressures on these streets.

81. The proposal is therefore considered acceptable in parking terms.

#### Cycle parking

82. Section 8.3 of the TS states that two Sheffield stands will be provided for 4 bikes and 9 two-tier stands will be provided for 18 long-stay spaces.

83. Drawing 01AP0010100-P01 proposes a cycle store on the ground floor, accessed via double doors on the western edge of the building. The store will accommodate both long-stay and short-stay spaces. This door should be automated and at least 1.2m wide to allow ease of passage for the cycles. Internal doors leading to the cycle store should also be automated and 1.2m wide for access. A detailed drawing of the cycle store should be provided to ensure the spaces can be accommodated. This would be secured by condition.

#### Servicing

84. Section 6.50 of the Transport Statement states that an uplift of 1-2 deliveries per day is expected to be generated. The deliveries are expected to occur from Hazel Road along the double yellow lines, as per the existing arrangements. The Transport Statement states that the uplift in servicing is minor. However, a delivery and servicing management plan is sought to ensure that vehicles do not unduly obstruct the highway- this will be secured by condition.

85. Private waste collection would need to be arranged for the site and the collection will occur from the Highway, as per existing arrangements. The Eurobins will be stored near the Highway, which will allow straightforward collection.

#### Travel Plan

86. The Travel Plan aims to decrease public transport trips by 10% over the 5 years and increase walking trips by 5% and cycle trips by 5%. Paragraph 3.11 states that the aim of targets is to increase active travel modes, given that the site already has a low level of private vehicle use already. Whilst this is welcomed, transportation would suggest that rather than decreasing the public transport trips, it is retained as constant and that walking and cycling is encouraged more. A travel plan coordinator will be appointed 3 months prior to the completion of the site. Induction packs will be provided to all users of the training and education space. The pack will include details of public transport times and routes, cycle and walking and car club information. Travel information will be displayed and provided on the site website too. The Travel plan will also provide travel details with any booking emails. The Travel Plan will be reviewed every year over 5 years and an initial baseline survey will also be provided. Table 6.1 provides an action plan which includes staff discount for cycle equipment, which is welcomed.

#### Construction Logistics Plan (CLP)

87. Page 16 of the CLP proposes a site layout plan. The applicant proposes to utilise park land (approx. 15m wide and 20m deep) on the eastern edge of the site to allow HGVs to access the site off street. This will result in the loss of trees and parks land for the duration of construction, and these would need to be replanted.

88. It will also result in the temporary closure of the footpath leading to Hazel Road open space- Brent's Parks Department have been consulted and they advise that the proposal should mitigate the risks of loading on the railway tunnel are not increased; and also that any liability in that respect, either during the works, or as a result of the works at a later date, would be covered. Then there would be the details of

space, timing, residents, park access and re-landscaping. An informative will be attached to advise the applicant to consult the parks department to authorise these works prior to them commencing. A temporary construction crossover would need to be provided for any vehicular access.

89. The proposal also suggests that on-street parking suspensions maybe sought to allow construction vehicle access.
90. Delivery lorries will be FORS and CLOCS accredited. In terms of routeing, vehicles will travel to and from the site along the Harrow Road. Page 18 shows the swept path analysis for HGV vehicles turning from Harrow Road into College Road. The plan shows that there may be some over run onto the pedestrian crossing, which is not welcomed. Further clarification and/or solutions are sought to ensure that large vehicles can achieve this turn in the road and so a revised CLP will be secured by condition. All deliveries should be booked in advance, to manage vehicles at the site.
91. The CLP shows that vehicles will park off street and therefore be able to leave in safely in forward gear. However, access to off-street parking is unclear. The site is located near an open space and children's playground and therefore safety of unloading/loading from the highway as well as pedestrian sight line visibility must be maintained. This should also be considered and details in the CLP with traffic marshals provided to ensure safety of pedestrian and cyclists. Wheel washing should be provided within the site, to ensure mud and debris is not carried out onto the Public Highway and regular sweeping of Hazel Road should also be carried out. A photographic condition survey of the surrounding Public Highway should be taken prior to works commencing and should be included the CLP and emailed to [waste.enforcement@brent.gov.uk](mailto:waste.enforcement@brent.gov.uk). This is to ensure that any damage caused by the contractors, to the highway, can be rectified. All footway closures and hoardings will require the appropriate temporary traffic orders and licences from Brent's Highways Service.
92. The CLP does not state where operatives will park, and they should be encouraged to use sustainable travel options to prevent vehicles being stacked on the Public Highway. Cycle parking facilities should be provided for them, where possible.
93. Full details of construction logistics are recommended to be conditioned.

### **Energy and sustainable design**

94. London Plan policy SI2 requires major development to be net zero-carbon. This is to include a minimum 35% reduction against building regulation's part L, including a minimum 15% reduction through energy efficiency measures for commercial developments. This is to be demonstrated via a detailed energy strategy.
95. Policy S12 of London Plan sets out the need for major developments to be net zero-carbon in terms of reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:
  - 1) be lean: use less energy and manage demand during operation
  - 2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
  - 3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
  - 4) be seen: monitor, verify and report on energy performance.
96. Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.
97. Local Plan policy BSUI1 requires major developments to connect to a decentralised energy system unless this is demonstrated as being unfeasible, or the proposed system is 100% renewable. The applicant identifies that the nearest such systems are too far away rendering them unfeasible, and that the proposed PV solar and heat pump solution, as well as the building being connection ready, be sufficient in this instance. This is accepted considering the proposal satisfying SI2 as above.
98. The proposed design incorporates sustainable materiality and would make use of re-used materials in the construction of the building such as recyclable timber and concrete and would make use of a lightweight cladding system. The chosen materials would help to reduce the carbon footprint of the building significantly.

99. The strategy, included within the Sustainability Statement required by BSUI1, demonstrates an overall reduction of 37%, including a 17% reduction via energy efficiency measures alone. The remaining reductions are achieved through 'green' measures, including the use of PV solar and Air Source Heat Pumps for heating and hot water. To achieve net zero, the remaining emissions will be accounted for via an offset payment of £7,849. The proposal also identifies and seeks to reduce unregulated emissions, in accordance with part E of SI2. A 'Be Seen' monitoring webform has been submitted and appended to the sustainability statement. The applicant has therefore satisfied policy SI2. A Section 106 agreement has been agreed in draft form with an obligation this carbon offset payment to be made and for the monitoring thereafter.

100. Local Plan policy BSUI1 also requires major non-residential development to achieve a BREEAM standard of 'Excellent'. This is targeted as set out in the preliminary BREEAM report. This secures a ~4% buffer enabling some leeway and ensuring a minimum score of 70% (excellent) is achieved. An interim BREEAM certificate should be submitted prior to construction, and a full certificate should be submitted post construction in accordance with the Council's sustainability SPD to ensure targets are achieved. This requirement will be secured via condition.

### **Air quality**

101. Policies SI1 and BSUI2 require the achievement of air quality neutral. The proposal is for car free development and includes the use of Air Source Heat Pumps. The proposal therefore meets the requirements for air quality neutral development in accordance with associated London Plan guidance.

102. The Council's Environmental Health Team have been consulted on the application and have reviewed the submitted Air Quality Assessment by PEC Ltd, dated 24 October 2024. The report has concluded that the development will be Air Quality Neutral for both transport and emissions which is accepted. Mitigation will be required for the construction phase. Therefore, provided these mitigation measures are conditioned then the proposal is considered to be acceptable in this respect.

### **Water management and flood risk**

103. Policy SI13 states that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. Brent policy DMP1 seeks to prevent unacceptable increased exposure to flood risk as a result of new development and policies BSUI3 and BSUI4 require flood risk management sustainable drainage measures on major development sites.

104. The application site lies within Flood Zone 1 for fluvial flooding and also at low risk of flooding from other sources including surface water, sewer and groundwater.

105. In addition to the initial drainage technical note, a further note revised as of March 2025 by Webb Yates has been submitted which states that in respect of greenfield run-off rates, the proposal has maximised the storage available within the site boundary by utilising a green roof, rain gardens, and an attenuation tank and states that the constraint of the railway running underneath the site has constrained the depth of the tank and the depth of storage at roof level due to increased loading. Therefore, it is considered that the storage proposed cannot be increased to allow for greenfield runoff rates.

106. Officers have reviewed the submitted documents and in line with the recommendation of the drainage consultant, to condition further details of the sustainable drainage strategy to ensure that measures to reduce surface water run off have been maximised within the site.

### **Biodiversity**

107. Policy BGI1 (d) sets out the need for all developments to achieve a net gain in biodiversity and avoid any detrimental impact on the biodiversity of an area.

108. Biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990, for major applications made on or after 12th February 2024. This sets out the need (subject to some exceptions) that every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met ("the biodiversity gain condition"). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. This increase can be achieved

through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits.

#### *Preliminary ecological assessment*

109. The application site itself has limited ecological value. It comprises almost entirely two buildings, with a small section of developed land, sealed surfaces and a medium sized tree. Mixed scrub is also contained within the boundaries of the application site. However, the site is adjacent to Hazel Road open space and within proximity to two Sites of Importance to Nature Conservation (SNIC), Kensal Green Cemetery 60m to the south and St Mary's Cemetery 163m to the south.
110. A preliminary ecological assessment has been prepared for by Greengage which has identified that the site has suitability for roosting bats. Two surveys are required in suitable weather conditions to determine the presence/absence of summer roosting bats. A precautionary method of works will also need to be provided to mitigate potential impacts on hibernating bats on site. Given the likely chance of roosting bats near the site, the absence of a bat survey upon submission is considered to be acceptable but a condition will be added to secure this prior to commencement. The preliminary ecological assessment also identified evidence of bird nesting within T7 which is proposed to be removed. The report recommends that further surveys for nesting birds may be required if construction works take place within the nesting season. It is recommended that mitigation measures are secured through a Construction Environmental Management Plan.
111. The scheme would secure a net gain in biodiversity as discussed below. As part of the overall enhancement measures the preliminary ecological assessment has recommended as part of the enhancement measures the provision of 3 bird boxes and 3 shift boxes to be installed on the building elevations. Such measures would be secured through a condition.

#### *Biodiversity Net Gain (BNG) Assessment*

112. A BNG assessment has been submitted in support of this application. The BNG assessment demonstrates that there would be a BNG (on-site) of 78% which would be a significant surplus on the 10% requirement. The BNG requirements would be secured within the Section 106 Agreement together with a Habitat Management and Maintenance Plan with the requirement to monitor habitat creation on site for a 30 year period. However, this does not include the tree due to limited space to provide on-site, which is considered to be of a medium distinctiveness. So, the loss of the tree (0.02 BU) would need to be compensated for offsite. This will be secured within the Section 106 Agreement.
113. Given the location of the site within an open space and SINC, conditions will be added to secure the provision of a Construction Management Plan, and Wildlife and nesting features prior to commencement.
114. The submitted BNG assessment states that a biodiverse (extensive) green roof would be used and clarity has been provided by the applicant in this regard. This would provide greater biodiversity and is less onerous for on-site maintenance.
115. The submission provides detail on the proposed habitat enhancements (with photos and species lists) for the proposed habitats on roof and ground level. This includes suggestions for bird and bat boxes.

#### **Trees**

116. Policy DMP1(h) highlights the need for development proposals to retain existing blue and green infrastructure including water ways, open space, high amenity trees and landscape features and providing appropriate additions or enhancements where possible.
117. London Plan policy G7 sets out the need for development proposals to ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.
118. Policy BGI2 of the Brent Local plan highlights in the case of major development to make provision for the planting and retention of trees on site. Where retention is agreed to not be possible, developers shall

provide new trees to achieve equivalent canopy cover or a financial contribution for off-site tree planting of equivalent canopy cover will be sought. Replacement canopy cover will be measured as total canopy area of new trees at time of planting being equal to canopy area of existing mature trees proposed for removal.

119. The application is accompanied by an Arboricultural Impact Assessment and Arboricultural Method Statement by Treework Environmental Practice (reference: 241216-TRP-1.1-MTL-AIA-MS and 241216-TEP-1.1-MTL-PAMS-MS dated December 2024), which has identified nine trees in proximity of the development, T7 is identified for removal, a further two trees T1 Lilac and T2 Sycamore are in poor condition so would be felled in line with sensible tree management.

120. The principle of the removal of T7 False Acacia growing within the highway to the north elevation of the existing building is accepted (as it is growing within 2.0m of the front elevation of the building), providing its canopy cover equivalent is replaced in the vicinity. A replacement tree to be planted within the highway in the neighbourhood will be secured as part of the S106 agreement.

121. T3 to T9 are all categorised as B tree, so are material considerations in the consideration of any planning applications. T1 is categorised as a U and T2 categorised as a C tree and both to be removed. The scheme proposes 4 new trees to be planted within the rear of the site. Given the restricted area for planting these trees would need to be small species. It is recommended that further details are conditioned to any forthcoming consent.

122. T3 and T4 are both quite close to the rear of the building (southern elevation). T3 and T4 both London Plane to the rear of the proposed building are proposed to be retained but their RPAs are to be for a single storey building extending into their RPAs and so they will be impacted to some degree by the proposals. It is proposed to re-pollard T4 to accommodate the proposed building. This is in accordance with the established management of this tree. It is identified that this should take the form of at the very least reducing the canopy on the north side 3.0m. The applicant has agreed for the re-pollarding of the entire tree to be undertaken at the time of the development.

123. T5 (Lime), T6 (Norway Maple), T8 (Silver birch) and T9 (Alder) are not affected by the proposals. If the measures set out in the AIA, AMS and TPP are put in place then this will minimise any impact on T3 and T4.

124. The proposed construction compound falls within the public open space, and as such will require the agreement of Brents parks team, as it will require the closing of part of the adjacent park, including public footpath. The applicant will be advised of this through an informative.

125. In summary it is considered that the provision of four small trees within the application site together with a replacement off site tree within the vicinity of the site would be sufficient to mitigate against the loss of T1, T2 and T7 in accordance with policy BGI2. The remaining trees within the vicinity of the application site would be retained. Conditions will be added which include arboricultural supervision of any excavations within the RPA of T3 and T4 and the submission of site inspection reports at regular intervals throughout hand excavations.

### **Urban Greening**

126. London Plan policy G5 requires commercial developments to achieve an Urban Greening Factor score of 0.3.

127. A score of 0.28 has been achieved. While this is slightly below the 0.3 target, there are limited opportunities to increase this score within the red line of the application site with the exception of further soft landscaping to the roof terrace level. Notwithstanding given the sustainable materials used in the design to reduce the carbon footprint of the scheme combined with the SUDS measures used, and when also considering that the urban greening score is a small shortfall from the required standard, on balance the proposed UGF shortfall is considered acceptable in this instance, having regard to the wider benefits of the proposal.

### **Land contamination**

128. The council's environmental health team has advised that due to the potential of contaminated land on this site, studies will need to be carried out to investigate potential land contaminants on site. This will be secured by condition.

## **Fire safety**

129. Policy D12b highlights that all major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor. The statement should detail how the development proposal will function in terms of:

- 1) the building's construction: methods, products and materials used, including manufacturer's details
- 2) the means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach
- 3) features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans
- 4) access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these
- 5) how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building
- 6) ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.

130. The applicant has submitted a fire safety impact assessment created by The Fire Surgery who are a suitably qualified third-party assessor. The statement addresses the requirements of Policy D12b and D5 including the features to minimise the risk of fire spread, an evacuation strategy and suitable means of escape for all building users, access and equipment for firefighting personnel. An informative will be attached to ensure that the development complies with Part B of Approved Document of the Building Regulations.

131. On the basis of the above, the submitted Fire Statement and fire safety design are suitable to meet the requirements of D12b.

## **Equalities**

132. In line with the Public Sector Equality Duty, the Council must have due regard to the need to eliminate discrimination and advance equality of opportunity, as set out in section 149 of the Equality Act 2010. In making this recommendation, regard has been given to the Public Sector Equality Duty and the relevant protected characteristics (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation).

133. The proposal would result in the creation of enhanced social infrastructure comprising of a mixed-use building that provides a dedicated community hall with its own separate entrance, alongside the ability to hire out relevant spaces within the Applicant's main headquarter building to maximise community benefit.

## **Conclusion**

134. Overall, while the proposal would result in the loss of a non-designated heritage asset, it is considered that the public benefits of the proposed enhanced community infrastructure to the benefit of local community groups which would outweigh the harm caused by the loss of the non-designated heritage asset which is considered of a low-medium distinctiveness.

135. It is assessed that the proposal is of a high-quality contemporary design which is considered would be an enhancement to the visual amenity of the site and wider locality. The larger built form in this location is considered acceptable and would have limited harm to neighbouring amenities. Moreover, the proposal would make use of high-quality sustainable materials to reduce its carbon impact and would create a safer environment through increased overlooking to the Hazel Road open space to the rear. It incorporates landscaping measures which would connect well to the green character of the Hazel Road open space.

136. The proposal would also have an acceptable impact on the local highways network. Additional information on servicing and delivery and construction management will be secured by condition.

137. Following the above discussion, officers consider that taking the development plan as a whole, the proposal is considered to accord with the development plan, and having regard to all material planning considerations, should be approved subject to conditions and completion of a Section 106 Agreement.

## DRAFT DECISION NOTICE



### DRAFT NOTICE

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

### DECISION NOTICE – APPROVAL

Application No: **25/0041**

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London  
SW1Y 5NQ

I refer to your application dated **07/01/2025** proposing the following:

Demolition of all existing buildings and structures and erection of 4 storey mixed-use building comprising of training centre and community hall uses (Use Classes F1/F2), with roof and rear first floor terraces, associated cycle parking, refuse storage, landscaping and all other associated and ancillary works.

and accompanied by plans or documents listed here:  
See condition 2

**at Little Trainers Playgroup and Hazel Road Community Centre, 26 Hazel Road and Harriet Tubman House, 28 Hazel Road, London, NW10 5PP**

The Council of the London Borough of Brent, the Local Planning Authority, hereby **GRANT** permission for the reasons and subject to the conditions set out on the attached Schedule B.

Date: 03/02/2026

Signature:

**David Glover**  
Head of Planning and Development Services

#### Notes

1. Your attention is drawn to Schedule A of this notice which sets out the rights of applicants who are aggrieved by the decisions of the Local Planning Authority.
2. This decision does not purport to convey any approval or consent which may be required under the Building Regulations or under any enactment other than the Town and Country Planning Act 1990.

DnStdG

**SUMMARY OF REASONS FOR APPROVAL**

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

National Planning Policy Framework 2024  
London Plan 2021  
Brent Local Plan 2019-2041

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 drawings and documents:

Existing site, demolition floor plans and elevations

- 01 AP 0100 001- REV P01- Existing Location Plan
- 01 AP 0100 002- REV P01- Existing Block Plan
- 01 AP 0110 100- REV P01- Existing Ground Floor Plan
- 01 AP 0110 101- REV P01- Existing 1st Floor Plan
- 01 AP 0110 102- REV P01- Existing Roof Plan
- 01 AP 0120 001- REV P01- Existing North Elevation
- 01 AP 0120 002- REV P01- Existing East Elevation
- 01 AP 0120 003- REV P01- Existing South Elevation
- 01 AP 0120 004- REV P01- Existing West Elevation
- 01 AP 0130 001- REV P01- Existing Section 01

Proposed site, floor plans and elevations.

- 01 AP 0020 002- REV P01- Proposed East Elevation
- 01 AP 0020 003- REV P01- Proposed South Elevation
- 01 AP 0020 004- REV P01- Proposed West Elevation
- 01 AP 0030 001- REV P01- Proposed Section 01
- 01 AP 0030 002- REV P01- Proposed Section 02
- 01 AP 0010 100- REV P01- Proposed Ground Floor Plan
- 01 AP 0010 101- REV P01- Proposed 1st Floor Plan
- 01 AP 0010 102- REV P01- Proposed 2nd Floor Plan
- 01 AP 0010 103- REV P01- Proposed 3rd Floor Plan
- 01 AP 0010 104- REV P01- Proposed Roof Plan

- 01 AP 0020 001- REV P01- Proposed North Elevation
- J5217-C-SK-0400- REV 01- Proposed Surface Water Drainage Sketch

Supporting documents

- 'Preliminary Ecological Appraisal' Version 1- dated October 2024 created by Greengage
- BREEAM Assessment (Land Use & Ecology) Version 1 dated December 2024 created by Greengage
- 'BREEAM Pre-Assessment Report ' dated November 2024 created by Greengage
- 'Preliminary Arboricultural Method Statement ' Revision 1.1 dated 04/05/2023 created by Treework Environmental Practise
- 'Arboricultural Impact Assessment' Revision 1.1. dated 19/12/2024 created by Treework Environmental Practise
- 'Framework BREEAM Travel Plan' dated April 2025 created by Caneparo Associates Limited

3 The development hereby approved shall not be used other than for purposes as a training centre and community hall within use classes F1 and F2, and shall not be used for any other purposes, notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 (as amended) (or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification) and the Town and Country Planning (General Permitted Development) Order 2015 (as amended) (or any order revoking and re-enacting that Order with or without modification).

Reason: An alternative community use or social infrastructure use could result in an intensification in use of the site and would need to be assessed on its own merits.

4 The recommendations and measures set out within the "Framework BREEAM Travel Plan" prepared by Caneparo Associates dated April 2025 shall be implemented in full from first occupation of the development hereby approved for the life of the development, unless a revised travel plan is submitted to and approved in writing by the Local Planning and thereafter implemented in full.

Reason: In the interests of promoting sustainable modes of travel.

5 The development shall be implemented in strict accordance with the Tree Protection Plan and Arboricultural Method Statement (241216-TRP-1.1-MTL-AIA-MS and 241216-TEP-1.1-MTL-PAMS-MS dated December 2024 by Treework Environmental Practice) or subsequent approved revisions.

Reason: To ensure that the trees to be retained will not be damaged during demolition or construction and to protect and enhance the appearance and character of the site and locality, in accordance with DMP1 and BGI 2.

6 No development shall commence until a written scheme of investigation (WSI) has been submitted to and approved in writing by the Local Planning Authority. The WSI shall provide details of the programme of historic building recording works to be carried out within the site, including post-fieldwork reporting and appropriate publication. The historic building recording site work shall thereafter be implemented in full in accordance with the written scheme of investigation.

The recording is to be carried out on the building internally and externally in accordance with Historic England's Understanding Historic Buildings to a Level 3 standard by a professional

archaeological/building recording consultant or organisation with a proven track record of delivering historic building recording. No demolition or development shall take place before the historic building recording has been completed in accordance with the written scheme of investigation approved and the provision made for analysis, publication and dissemination of the results and archive deposition has been secured.

Reason: To ensure that the heritage of the existing building of the site are adequately documented.

Reason for pre-commencement condition: To ensure that the heritage of the existing building is adequately documented prior to any demolition works taking place.

- 7 No development shall commence until full details of mitigation measures, include selective salvage and a history of the building, are secured in consultation with the Council's Heritage Officer and key heritage groups. The full details of mitigation measures shall be submitted to and approved in writing by the Local Planning Authority. The agreed measures shall thereafter be provided in accordance with the agreed measures and retained on display throughout the lifetime of the development.

Reason: To ensure that the heritage of the existing building are adequately preserved and documented.

Reason for pre-commencement condition: To ensure that the heritage of the existing building is adequately documented prior to any demolition works taking place.

- 8 Prior to commencement of the development, a Construction Logistics Plan identifying anticipated construction traffic movements and setting out measures to manage and minimise the construction traffic impacts arising from the development shall be submitted to and approved in writing by the Local Planning Authority.

The development shall thereafter be carried out in full accordance with the approved Construction Logistics Plan.

Reason: To ensure construction traffic impacts are effectively managed throughout the construction process.

Reason for pre-commencement condition: The condition seeks to exercise control over the construction phase of the development and therefore needs to be discharged prior to construction.

- 9 Prior to the commencement of the development hereby approved a Construction Method Statement (CMS) shall be submitted to and agreed in writing by the Local Planning Authority outlining measures that will be taken in that phase to control dust, noise, vibration, air quality and other environmental impacts of the development, whilst it is being constructed.

In addition, measures to control emissions during the demolition, site clearance, enabling works and construction phase should be written into an Air Quality and Dust Management Plan (AQDMP), in line with the requirements of the 'Control of Dust and Emissions during Construction and Demolition SPG'. The AQDMP (or CEMP) should also be submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be constructed in accordance with the approved Construction Method Statement, and AQDMP, together with the measures and monitoring protocols implemented throughout the site enabling and construction phase(s), unless otherwise agreed in writing by the Local Planning Authority.

Reason: To safeguard the amenity of the neighbours by minimising impacts of the development that would otherwise give rise to nuisance.

Reason for pre-commencement condition: Nuisance from demolition and construction activities can occur at any time, and adequate controls need to be in place before any work starts on site.

10 Prior to development commencing, a Construction Ecological Management Plan shall be submitted to and approved in writing by the Local Planning Authority, setting out how the construction process will be managed so as to protect the existing ecology of the site and off-site receptors, in accordance with the recommendations of the approved 'Preliminary Ecological Appraisal' Version 1- dated October 2024 created by Greengage. All recommendations within the approved CEMP shall be carried out throughout the construction of the development.

Reason: In order to ensure that the development results in no net loss to biodiversity and impact upon wildlife.

Reason: for pre-commencement condition: Impacts arising from the construction process occur as soon as development commences and adequate controls need to be in place from this time.

11 Prior to the commencement of any development (including site preparation works), a bat roosting survey shall be undertaken by a suitably qualified ecologist to assess the presence or likely absence of bats roosting within all existing buildings within the site. The survey shall be conducted in accordance with current best practice guidelines and only undertaken from the period May to August inclusive and shall be submitted to and approved in writing by the Local Planning Authority.

If the survey confirms the presence of bats or identifies potential roosting features, a detailed mitigation and enhancement strategy shall be prepared and submitted for approval in writing by the Local Planning Authority. The strategy shall include, but not be limited to:

- (a) Measures to avoid disturbance or harm to bats and their roosting habitats.
- (b) Timetable for any necessary works, including appropriate seasonal constraints.
- (c) Proposals for compensatory habitat creation or enhancement.
- (d) Details of any necessary licensing requirements from Natural England.

All subsequent demolition works shall be carried out in strict accordance with the approved mitigation and enhancement strategy, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure compliance with the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017, and to safeguard biodiversity.

12 The development hereby permitted shall not be commenced until the following documents (in consultation with TfL Infrastructure Protection) have been submitted to and approved in writing by the local planning authority which:

1. provide details for demolition, excavation, foundations and ground floor structures, or for any other structures below ground level;
2. provide details on the use of tall plant/scaffolding;
3. identify the location of the existing LU assets and/or the structures that LU has a running right;
4. accommodate ground movement arising from the construction thereof;
5. demonstrate to TfL's satisfaction that the methods and timing of the works are not contrary to the contents of LU's document "Special Conditions for Outside Parties working on or near the railway";
6. for landscaping or planting works above a shallow tunnel, TfL's agreement to such schemes should be obtained;
7. an assessment of railway noise and vibration shall be carried out and appropriate protective measures shall be taken to protect the users of the property and of other properties potentially affected as a result of the current development against noise and vibration.

The development shall thereafter be carried out in accordance with the approved details.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with the London Plan 2021 Policy T3 and 'Land for

Reason for pre-commencement condition: Adequate controls need to be in place before any work starts on site.

13 Prior to development commencing (excluding demolition of existing buildings), a Sustainable Drainage Strategy shall be submitted to and approved in writing by the Local Planning Authority. The Sustainable Drainage Strategy shall include details of the following:

- (a) Detailed drainage calculations incorporating green roofs and rain gardens as part of the strategy together with run off calculations for greenfield, existing, and proposed conditions for the following storm events:
  - 1 in 10 years
  - 1 in 30 years
  - 1 in 100 years
  - 1 in 100 years + 40% climate change
- (b) MicroDrainage Calculations to demonstrate that the site will not flood during all return periods up to 1 in 100 years + 40% climate change
- (c) A drawing identifying the exceedance routes during extreme storm events.

The development shall thereafter be designed, implemented and maintained in accordance with the details approved within the Sustainable Drainage Strategy throughout the lifetime of the development unless alternative details are submitted to and approved in writing by the Local Planning Authority.

Reason: In order to ensure that the drainage strategy aligns with best practice and does not pose a flood risk to the site or surrounding areas.

14 Prior to the commencement of development (excluding demolition and site preparation works), a site investigation report shall be prepared by a competent person(s) to determine the nature and extent of any soil contamination and shall have been submitted to and approved in writing by the Local Planning Authority.

The investigation shall be carried out in accordance with the agreed principles, which should be informed by BS 10175:2011 + A2:2017 and the Environment Agency's current Land Contamination Risk Management Guidance.

Reason: To ensure the safe development and secure occupancy of the site.

15 Prior to commencement of development (excluding demolition and site preparation works), a remediation report in respect of that phase shall be submitted to and approved in writing by the Local Planning Authority. The remediation report shall include the results of any site investigation and analysis undertaken as well as an assessment of the risks posed by any identified and unidentified contamination and the associated remediation options.

A verification report shall be submitted to and approved in writing by the Local Planning Authority prior to first occupation of the development showing that remediation has been carried out in accordance with the approved remediation scheme and shall demonstrate that the site is suitable for end use (unless the Planning Authority has previously confirmed that no remediation measures are required).

Reason: To ensure the safe development and secure occupancy of the site.

16 No piling shall take place until a Piling Method Statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority

in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan.

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure.

17 Details of materials for all external building work, including samples which shall be made available for viewing in an agreed location, shall be submitted to and approved in writing by the Local Planning Authority prior to any works commencing on the development (excluding demolition, site clearance and laying of foundations). The work shall be carried out in accordance with the approved details thereafter, unless otherwise agreed in writing by the local planning authority.

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

18 Prior to any above ground development, a detailed landscaping scheme shall be submitted to and approved in writing by the Local Planning Authority. This shall include:

1. A statement of landscape and biodiversity design objectives and how these will be delivered over a minimum 30-year period in line with the Habitat Management and Maintenance Plan and Biodiversity Net Gain Plan as approved.
2. A masterplan showing how BNG measures integrate with Urban Greening (UGF), including retained habitats and green infrastructure (e.g. green roofs, walls, SuDS).
3. An updated Biodiversity Net Gain Assessment in line with statutory guidelines, identifying habitat areas and methods of creation.
4. Soft landscaping details including:
  - Planting plans showing retained and proposed vegetation with species and sizes.
  - At least 60% native species by number and diversity, with planting to support pollinators, seasonal interest, and structural variety.
  - Water features and green infrastructure elements (e.g. green/biosolar roofs, rain gardens, biodiverse lawns, herb planters, etc).
5. Hard landscaping details including:
  - Existing/proposed levels and ground modelling.
  - Materials, boundary treatments, and permeable surfaces.

All landscaping shall be completed prior to first occupation, and thereafter maintained in accordance with the approved management plan.

Reason: To secure high-quality landscaping and biodiversity enhancements, in accordance with the Brent Local Plan.

19 Prior to commencement of development (excluding site clearance, demolition and laying of foundations), the following details shall be submitted to and approved in writing by the Local Authority Planning:

the layout and access to cycle stores to provide 18 long-stay cycle spaces and 2 short stay "Sheffield" stands, including details of the cycle storage room doors demonstrating that they will have been designed in compliance with the guidance set out within London Cycle Design Standards.

All of the cycle parking within the development shall be made available for use prior to the first occupation of the development hereby approved and thereafter retained and maintained for the life of the development and not used other than for purposes ancillary to the occupation of the building hereby approved, unless alternative details are agreed in writing by the Local Planning Authority.

Reason: To ensure that the development is fit for purpose and adequately provides for and

encourages uptake of cycling among building users.

20 Prior to commencement of development above ground level, a scheme for wildlife and nesting features shall be submitted to and approved in writing by the Local Planning Authority. These shall include:

- a) At least 1 of each of the following features on the proposed building/site:
  - i) multi-chamber swift bricks (preferred) or boxes,
  - ii) house sparrow terraces,
  - iii) bat bricks (preferred) or boxes
  - iv) hedgehog holes in garden fences
  - vii) deadwood and sand piles within planting areas (overwintering habitat)
  - viii) larvae food plant species within planting beds (breeding habitat for butterfly species)

The scheme shall include full details (type of feature, location, plan and elevation views, height above ground (if applicable) and nearest external lighting (if likely to have an impact).

(b) Prior to occupation of the development hereby approved, a Statement of Conformity shall be submitted to and approved in writing by the Local Planning Authority. The Statement of Conformity will include photographs of each habitat/feature installed as per the approved details. The wildlife and nesting features shall thereafter be retained throughout the lifetime of the development unless alternative details are submitted to and approved in writing by the Local Planning Authority.

Reason: To enhance the biodiversity value of the land in accordance Policy BGI1 of the Brent Local Plan.

21 Prior to first occupation of the development hereby approved, a delivery and servicing Plan prepared in accordance with Transport for London guidance shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall thereafter be implemented in accordance with the approved details and retained thereafter, unless otherwise in writing agreed with the Local Planning Authority.

Reason: To ensure adequate delivery and servicing arrangements for the development, to avoid conflict with other road users in the interest of highway safety.

22 Prior to first use of the building hereby approved, a community use agreement, shall be submitted to and approved in writing by the local planning authority. The agreement shall include details of pricing policy, hours of use, management responsibilities and a mechanism for review. The development shall then be used in accordance with the approved details throughout the lifetime of the development, unless alternative details are submitted to and approved in writing by the Local Planning Authority and thereafter implemented in full.

Reason: To secure well managed safe community access to the community hall facilities and other uses to bring sufficient benefit to the wider community.

23 Prior to the installation of any external lighting, details of such lighting shall be submitted to and approved in writing by the Local Planning Authority. This shall include, but is not limited to, details of the lighting fixtures, luminance levels within and adjoining the site.

The lighting shall not be installed other than in accordance with the approved details.

Reason: In the interests of ecology, safety and the amenities of the area.

24 Any plant shall be installed, together with any associated ancillary equipment, so as to prevent the transmission of noise and vibration into neighbouring premises. The rated noise level from all plant and ancillary equipment shall be 10dB (A) below the measured background noise level when measured at the nearest noise sensitive premises. Prior to installation of any plant

together with any associated ancillary equipment, an assessment of the expected noise levels shall be carried out in accordance with BS4142:2014 'Methods for rating and assessing industrial and commercial sound.' and any mitigation measures necessary to achieve the above required noise levels shall be submitted to and approved in writing by the Local Planning Authority prior to the installation of the plant. The plant shall thereafter be installed and maintained in accordance with the approved details.

Reason: To safeguard the residential amenity of nearby properties.

25 Within six months from practical completion of the non-domestic floorspace hereby approved, a revised BREEAM Assessment and Post Construction Certificate, demonstrating compliance with the BREEAM Certification Process for non-domestic buildings and the achievement of a BREEAM 'Excellent' rating as a minimum, shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the non-domestic floorspace is constructed in accordance with sustainable design and construction principles, in accordance with Brent Local Plan Policy BSU1.

26 Prior to the occupation of the development the applicant shall submit to the local planning authority for its approval a Management Plan for the operation of the site with measures to prevent noise and disturbance to the locality. The development shall be carried out and used in accordance with the approved details.

Reason: In order to ensure that use operates effectively to prevent noise and disturbance to the neighbouring occupiers.

The residential development must be designed to ensure the following vibration levels stated in BS6472:2008 Evaluation of human exposure to vibration in buildings (1Hz to 80 Hz) are not exceeded.

Place	Vibration dose values - Low probability of adverse comment (m/s <sup>1.75</sup> )
Residential buildings 16 h day	0.2 to 0.4
Residential buildings 8 h night	0.1 to 0.2

\*For offices and workshops, multiplying factors of 2 and 4 respectively should be applied to the above vibration dose value ranges for a 16h day

The applicant shall submit evidence that the above standard will be met, for approval by the Local Planning Authority.

Reason: To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess vibration from transportation sources.

27

28 The development hereby approved shall be constructed to provide sound insulation against internally generated noise. This sound insulation scheme shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of the development and implemented in full. The proposal must comply with BS8233:2014 'Guidance on sound insulation and noise reduction for buildings' to attain the following internal noise levels: For daytime (0700 - 2300) noise levels for living rooms and bedrooms the maximum noise levels are 35 dB LAeq (16hr). Outside of this time (2300 - 0700) the standard for bedrooms is 30 dB LAeq (8hr), 45 dB Lmax.

Reason: To ensure an appropriate noise environment in the interest of the amenities of existing and future residents.

## INFORMATIVES

**1** - The provisions of The Party Wall etc. Act 1996 may be applicable and relates to work on an existing wall shared with another property; building on the boundary with a neighbouring property; or excavating near a neighbouring building. An explanatory booklet setting out your obligations can be obtained from the government website:

<https://www.gov.uk/government/publications/preventing-and-resolving-disputes-in-relation-to-party-walls/the-party-wall-etc-act-1996-explanatory-booklet>

**2** - The applicant must ensure, before work commences, that the treatment/finishing of flank walls can be implemented as this may involve the use of adjoining land and should also ensure that all development, including foundations and roof/guttering treatment is carried out entirely within the application property.

**3** - The applicant is advised that this development is liable to pay the Community Infrastructure Levy; a Liability Notice will be sent to all known contacts including the applicant and the agent. Before you commence any works please read the Liability Notice and comply with its contents as otherwise you may be subjected to penalty charges. Further information including eligibility for relief and links to the relevant forms and to the Government's CIL guidance, can be found on the Brent website at [www.brent.gov.uk/CIL](http://www.brent.gov.uk/CIL).

**4** - The submission/approval of the Fire Safety Statement does not replace the need for building regulation approval in relation to fire safety, nor does it convey or imply any approval under those regulations.

**5** - The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for the development of land in England is deemed to have been granted subject to the condition “(the biodiversity gain condition”) that development may not begin unless:

- (a) a Biodiversity Gain Plan has been submitted to the planning authority, and
- (b) the planning authority has approved the plan.

The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan if one is required in respect of this permission would be Brent Council. Based on the information available this permission is considered to be one which will require the approval of a biodiversity gain plan before development is begun because none of the statutory exemptions or transitional arrangements are considered to apply.

Any person wishing to inspect the above papers should contact Curtis Thompson, Planning and Regeneration, Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ, Tel. No. 020 8937 1807

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## COMMITTEE REPORT

Planning Committee on

11 February, 2026

Item No

05

Case Number

25/3070

## SITE INFORMATION

RECEIVED	31 October, 2025
WARD	Wembley Park
PLANNING AREA	Brent Connects Wembley
LOCATION	<b>North Eastern Lands (Plots NE04, NE05 and NE06) - Land bound by Engineers Way to the south and Fulton Road to the North and East, Wembley</b>
PROPOSAL	Temporary use of land for meanwhile land uses comprising of; an outdoor sports facility (Use Class F2) to provide 5 no. 5-a-side floodlit all weather football pitches with a single storey pavilion building and an ancillary support area; a temporary building for use as a leisure, entertainment and events venue with storage buildings and external plant equipment in an ancillary support area; boundary treatment; shared informal public realm (with new seating, lighting and CCTV) along with provision for cycle parking, accessible car parking, and an internal vehicular access route with vehicular drop off.
PLAN NO'S	Please refer to Condition 2.
LINK TO DOCUMENTS ASSOCIATED WITH THIS PLANNING APPLICATION	<p><b><u>When viewing this on an Electronic Device</u></b></p> <p><b>Please click on the link below to view <b>ALL</b> document associated to case</b></p> <p><a href="https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&amp;keyVal=DCAPR_175473">https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&amp;keyVal=DCAPR_175473</a></p> <p><b><u>When viewing this as an Hard Copy</u></b></p> <p><b>Please use the following steps</b></p> <ol style="list-style-type: none"> <li>1. Please go to <a href="https://pa.brent.gov.uk">pa.brent.gov.uk</a></li> <li>2. Select Planning and conduct a search tying "25/3070" (i.e. Case Reference) into the search Box</li> <li>3. Click on "View Documents" tab</li> </ol>

## RECOMMENDATIONS

That the Committee resolve to GRANT planning permission.

That the Head of Planning or other duly authorised person is delegated authority to issue the planning permission and impose conditions and informatics to secure the following matters:

### Conditions

#### *Compliance*

1. 3-year expiry
2. Approved drawings
3. Matching materials
4. Approved use for Plot 01 (5-a-side football pitches)
5. Approved use for Plot 02 (Indoor immersive exhibition)
6. Estate Operational Management Plan
7. Operational Management Plan for Plot 01 (5-a-side football pitches)
8. Operational Management Plan for Plot 02 (Indoor immersive exhibition)
9. Hours of restriction for use of the pitches and associated floodlighting
10. Hours of operation for Plot 01 (5-a-side football pitches)
11. External floodlights timings for Plot 01 (5-a-side football pitches)
12. Maximum lux levels
13. Flood Risk Assessment & Drainage Strategy
14. Surface Water Drainage Verification Details
15. Lighting Report
16. Tree Protection
17. No music, public address system or any other amplified sound
18. Cycle Parking

#### *Submission*

19. Landscaping Details
20. Delivery and Servicing Management Plan

### Informatics

1. Biodiversity net gain exempt
2. Licences and permits
3. Counter terrorism awareness workshops
4. Advertisement consent
5. Engagement with Brent Works

That the Head of Planning or other duly authorised person is delegated authority to make changes to the wording of the committee's decision (such as to delete, vary or add conditions, informatics, planning obligations or reasons for the decision) prior to the decision being actioned, provided that the Head of Planning or other duly authorised person is satisfied that any such changes could not reasonably be regarded as deviating from the overall principle of the decision reached by the committee nor that such change(s) could reasonably have led to a different decision having been reached by the committee.

## SITE MAP

### Planning Committee Map



Site address: North Eastern Lands (Plots NE04, NE05 and NE06) - Land bound by Engineers Way to the south and Fulton Road to the North and East, Wembley

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This map is indicative only.

## PROPOSAL IN DETAIL

2. The application seeks temporary planning permission for the meanwhile use of the land comprising of an outdoor sports facility (Use Class F2) to provide five 5-a-side floodlit all weather football pitches with a 133sqm single-storey pavilion building and an ancillary support area, a temporary building (3600sqm) for use as a leisure, entertainment and events venue with storage buildings and external plant equipment in an ancillary support area, alterations to the boundary treatment, a central shared informal public realm (with new seating, lighting and CCTV) along with provision for cycle parking, accessible car parking, and an internal vehicular access route with vehicular drop off area. The meanwhile uses would be for a period of 3 years, after which time it is envisaged that these parts of the wider Quintain Wembley Park development could be delivered.

### Proposed Meanwhile Uses:

3. The application has been split into two plots, as detailed below.

#### Plot 01

Use: Five-a-side football pitches.

- Five [5] x five a-side football pitches each measuring 36m in depth x 27m in width
- One [1] temporary pavilion building

Hours of operation:

- Sunday to Thursday 08:00 to 21:00
- Friday and Saturday 08:00 to 22:00

#### Plot 02

Use: Indoor immersive exhibition.

- One [1] temporary structure measuring approximately 90m in depth x 40m in width x 12m in height, with external space divided by temporary walling to create loading areas, back of house area, toilets, facilities servicing and event guest arrival.

Hours of operation:

- Monday to Sunday 09:00 to 21:00

### Amendments Since Submission

4. The following amendments have been made since the original submission:
  - a. pedestrian path was added to proposed layout plan to address pedestrian safety concerns
  - b. number of car drop-off spaces reduced from six to five
5. The application site occupies an area of approximately 1.85 hectares and takes in land made up of former hardstanding from the site's previous use as Yellow Car Park (and then later in parts as a site compound for contractors). This land will eventually form the residential Plots NE04, NE05 and NE06 which are located in the North Eastern Lands character area of the Wembley Park Masterplan (see relevant planning history below).
6. Directly to the west and southwest of the site are Plots NE01 (comprising of 770 student accommodation rooms), NE02 and NE03 (comprising of ground floor commercial uses and a combined total of 769 residential dwellings on the upper floors) as well as Union Park North – each of which is delivered pursuant to the Wembley Park Masterplan.
7. There are two existing vehicular accesses to the site from Fulton Road. The public transport accessibility level (PTAL) for the site is measured at 4 through to 6a, which is classified as 'good' to 'excellent'. There

are frequent bus services operating in the vicinity of the site and the nearest rail/underground stations are Wembley Stadium, Wembley Central and Wembley Park station.

8. The site is within Flood Zone 1. There are no listed buildings within the site's curtilage, and it is not located within a Conservation Area.
9. The site is within the Wembley Growth Area and forms part of site allocation BCSA8 for mixed-use residential-led development.

## **SUMMARY OF KEY ISSUES**

1. The key planning issues for Members to consider are set out below. Members will need to balance all of the planning issues and the objectives of relevant planning policies when making a decision on the application.

- a. **Principle of Development:** The site is within the Wembley Growth Area and is close to the edge of the Wembley Town Centre. The use of vacant land for a meanwhile use is supported by Policy BE4 of Brent's Local Plan and Policy HC5 of the London Plan, which support the use of vacant properties and land for pop-ups or meanwhile uses for cultural and creative activities during the day and at night-time. The development proposal would facilitate the delivery of the wider aims and objectives of the Wembley Growth Area, drawing footfall to the town centre in addition to creating employment opportunities and enhancing the cultural and community offer of the area. As such, the proposed uses are appropriate for this location.
- b. **Scale, Layout and Appearance:** The scale and layout of the proposed scheme is considered to be acceptable within the context of the surrounding area, which comprises relatively tall buildings in a dense urban context. Plot 01 would comprise a typical design for outdoor sport pitches, while Plot 02 would be of an appropriate size to enable the proposed entertainment use. The overall finished appearance of the development is considered to be acceptable in design terms and in keeping with the urban nature of the surrounding area. Further landscaping details would also be secured by condition to improve the public realm for the temporary use period.
- c. **Noise, Lighting and disturbance:** Plot 01 would contain a series of directional floodlights which would have the potential to generate light disturbance to nearby properties. Both plots also have the potential to generate noise. Sufficient information has been provided to demonstrate that a good environment can be maintained for nearby residents throughout the temporary lifetime of the development.
- d. **Highways:** The visitor movement patterns, servicing arrangements, cycle parking facilities and associated highways related matters are considered to be acceptable, subject to a number of planning conditions.
- e. **Flooding:** A Flood Risk Assessment and Drainage Strategy (including detailed SuDS strategy) have been submitted to assess the risks. The site is within Flood Zone 1 (low risk of fluvial flooding). Some parts of the site are categorised as 3a for surface water flooding, and this risk has been addressed through the drainage strategy. The site as previously existing was historically used as car parking for Wembley Stadium and was predominantly hard surfaced, and as such it is considered that the proposed development would be no worse than the previously existing arrangement in terms of run off and permeability, however this requires connection to the wider drainage network. This connection has been proposed, and no in principle objections are raised by the Local Lead Flood Authority (LLFA), Environment Agency, or Thames Water to the proposed strategies. However, the LLFA have sought conditions to be secured to demonstrate the capacity of the drainage network at its connection points can accommodate run off.

## **Site Designations**

<b>Relevant site designations:</b>
Air Quality Action Area: Wembley and Tokyngton
Air Quality Focus Area: Wembley Park/ Ark Academy
Floodzone 3a (surface-water)
Local Plan Site Allocation: BCSA8 – Wembley Retail Park

Tall Buildings Zone  
Wembley Growth Area

Protected Views:

- Chalkhill Park:
- The White Horse Bridge:
- West Coast Main Line
- One Tree Hill
- Welsh Harp Reservoir

**Land Use Details**

<b>Site area (ha):</b>	1.85ha
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**Parking**

	Car Parking Spaces (General)	Car Parking Spaces (Disabled)	% EVCP	Bicycle Spaces	
				Short stay	Long stay
<b>Existing</b>	0	0	0	0	0
<b>Proposed</b>	5 (drop-off)	6	0	0	67

**RELEVANT SITE HISTORY**

10. The application site (North East Lands) falls within the Wembley Park Masterplan Area (original ref: 15/5550 which has subsequently been amended by planning consents 17/0328, 18/2214 and 20/2844, 22/2886, 24/0203 and 25/2141). Outside of this, the relevant planning history is as follows:

- Reference:** 24/1860  
Temporary use of the land for film-making with associated set building, support structures, staff area and parking.  
**Address:** Ex Yellow Car Park, Engineers Way, Wembley  
**Decision:** Approved
- Reference:** 24/0658  
Temporary change of use for a period of up to three years to Sui Generis (events venue) to create a temporary, meanwhile use events and entertainment venue to house exhibition-led events, audience areas and back of house areas.  
**Address:** 20 – 28 Fulton Road, Wembley, Brent, HA9 0TF  
**Decision:** Approved
- Reference:** 21/1002  
Temporary change of use of light industrial units to create a temporary, meanwhile use events and entertainment venue to house theatrical film screenings, audience areas and back of house facilities.  
**Address:** Units 20-28 Fulton Road, Wembley, Brent, HA9 0TF  
**Decision:** Approved
- Reference:** 22/1883  
Installation of temporary demountable structures (marquees, cabins, storage units) and associated facilities to support event and entertainment activities.  
**Address:** Units 20-28 Fulton Road, Wembley, Brent, HA9 0TF  
**Decision:** Approved
- Reference:** 20/2716  
Temporary change of use of the car park to a construction compound with security and welfare

facilities.

**Address:** The Junction Wembley Retail Park, Engineers Way, Wembley, HA9 0EG

**Decision:** Approved

f. **Reference:** 16/5515

Construction of a temporary small-sided outdoor sports facility with four 5-a-side football pitches for a period of 3 years.

**Address:** Wembley Retail Park, Land at Fulton Road/Rutherford Way, Wembley

**Decision:** Approved

## CONSULTATIONS

### Public Consultation

11. The application was advertised by seven site notices displayed on 5th November 2025 and in the local press on 11th November 2025. No public representations were received.

### External Consultees

Consultee	Comments Raised	Officer Response
Metropolitan Police Service	<p>No objection subject to further information on the Operational Management Plan.</p> <p>Also recommended the following:</p> <ul style="list-style-type: none"><li>• London cycle stands instead of Sheffield stands.</li><li>• Not to use temporary planters as they can be used to conceal items such as drugs or weapons.</li><li>• All venues should be cashless to remove the risk of reward for burglary.</li></ul>	<p><u>Cycle Storage</u> The London style cycle stand can be required via a compliance condition.</p> <p><u>Temporary Planters</u> This is noted.</p> <p><u>Cashless Venues</u> This is noted. This is an operational matter, not for the planning system.</p> <p>Further details for security measures could be added as a condition.</p>

### Internal Consultees

Consultee	Comments Raised	Officer Response
Highways Management	No objection raised.	Noted.
Employment Delivery and Strategy Senior Manager	The proposal does not meet the policy threshold to secure an employment and training plan.	Noted.
Environmental Health (EH)	<p><u>Air Quality</u> - The application site is within an Air Quality Management Area.</p> <p><u>Light</u> The EH Officers queried what time the external lighting would be switched off.</p> <p><u>Noise</u> The EH Officers requested the applicants consider any further noise mitigation measures.</p>	<p><u>Air Quality</u> - Noted.</p> <p><u>Light</u> The applicants confirmed the external lighting would be turned off at 22.15. A condition restricting the hours of operation for the external lighting would be imposed with any consent of planning permission.</p> <p><u>Noise</u> The Noise Assessment measures proposed are considered to be sufficient.</p>
Licensing Enforcement Officer	The application site is not currently licensed to provide licensable activities.	The applicant can be reminded to apply for licensing by way of informative on the decision notice.
Local Lead Flood	No objection following the provision	This has been discussed in the

Authority	of further information. A proportionate water drainage condition should be secured.	'Flooding' section of this report (below) and a condition attached to secure water drainage details.
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## POLICY CONSIDERATIONS

12. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of this application should be in accordance with the development plan unless material considerations indicate otherwise.
13. The development plan is comprised of the The London Plan (2021) and the Brent Local Plan (2019-2041). Key policies include:

### The London Plan (2021)

- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering good design
- Policy D5 Inclusive Design
- Policy D8 Public realm
- Policy D11 Safety, security and resilience to emergency
- Policy D12 Fire Safety
- Policy D14 Noise
- Policy G5 Urban greening
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and woodlands
- Policy HC5 Supporting London's culture and creative industries
- Policy S5 Sports and recreation facilities
- Policy SI1 Improving air quality
- Policy SI2 Minimising greenhouse gas emissions
- Policy SI4 Managing heat risk
- Policy SI5 Water infrastructure
- Policy SI6 Digital Connectivity Infrastructure
- Policy SI 7 Reducing waste and supporting the circular economy
- Policy SI 12 Flood risk management
- Policy SI 13 Sustainable drainage
- Policy T2 Healthy Streets
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car parking
- Policy T7 Deliveries, servicing and construction

### Brent Local Plan (2019-2041)

- DMP1 Development Management General Policy
- BCGA1 Wembley Growth Area
- BCSA8 Wembley Retail Park
- BD1 Leading the way in good design
- BE1 Economic Growth and Employment Opportunities for All
- BE4 Supporting Strong Centres
- BGI1 Blue and Green Infrastructure in Brent
- BGI2 Trees and Woodlands
- BSUI1 Creating a Resilient and Efficient Brent
- BSUI2 Air Quality
- BSUI3 Managing Flood Risk
- BSUI4 On-site Water Management and Surface Water Attenuation
- BT1 Sustainable Travel Choice
- BT2 Parking and Car Free Development

Other material considerations include:

- National Planning Policy Framework (2024)
- Planning Practice Guidance
- Sport England Design Guidance: Artificial Grass Pitch Acoustics - Planning Implications (2015)

## Mayor of London Planning Guidance

- Mayor of London - Air Quality Neutral LPG (Feb 2023)
- Mayor of London - 'Be Seen' energy monitoring guidance (2021)

## Brent's Supplementary Planning Guidance

- Brent's Design Guide – Supplementary Planning Document 1 (2018)
- Sustainable Environment & Development SPD (2023)

# **DETAILED CONSIDERATIONS**

## **Context**

14. The application site is situated within the Wembley Park regeneration area. The site, formerly used as the yellow car park was granted outline planning permission in 2016 (LPA ref: 15/5550, as amended) for mixed use development across the wider Wembley Park area. This outline permission comprises around 5,000 homes, commercial and community floorspace, a school and new open space including a public park. A number of plots relating to the outline consent have now been built out, including parts of BCSA8. Part of the North-East Lands remains undeveloped (north of the new park), and this application seeks the meanwhile use of this land ahead of development in accordance with the above consent.

15. Acknowledging the phased redevelopment of the Wembley Park Masterplan, a number of meanwhile uses have also come forward within the regeneration area, ahead of redevelopment in accordance with the relevant outline consents. These include Boxpark and the Troubadour Theatre.

## **Principle of Development**

16. London Plan Policy HC5 sets out that development proposals should consider the use of vacant properties and land for pop-ups or meanwhile uses for cultural and creative activities during the day and at night-time to stimulate vibrancy and viability and promote diversity in town centres, Cultural Quarters and other areas. This is supported by Policy BE4 of Brent's Local Plan which outlines that the use of vacant/under-utilised sites or buildings for occupation by temporary uses that will benefit a town centre or Growth Area's viability and vitality will be supported.

17. London Plan Policy S5 outlines that development proposals for sports and recreation facilities should:

- increase or enhance the provision of facilities in accessible locations, well-connected to public transport and link to networks for walking and cycling
- maximise the multiple use of facilities, and encourage the co-location of services between sports providers, schools, colleges, universities and other community facilities
- support the provision of sports lighting within reasonable hours, where there is an identified need for sports facilities, and lighting is required to increase their potential usage, unless the lighting gives rise to demonstrable harm to the local community or biodiversity.

18. This is supported by Local Plan Policy BSI1 which states that proposals for new or enhanced social infrastructure facilities will be supported by the Council where:

- easily accessible by public transport, walking and cycling, preferably in town centres or Growth Areas;
- located within the community they are intended to serve;
- provided in flexible and adaptable buildings;
- ideally co-located with other social infrastructure uses; and
- maximising wider community benefit, through if necessary, requiring formal community use agreements.

19. The application site is within the Wembley Growth Area and is in close proximity to the Wembley Park Town Centre boundary. Local Plan Policy BCGA1 promotes sports, leisure, tourism and visitor attractions, creative and cultural industries within the Wembley Growth Area, to reflect its recognised potential as a future metropolitan centre and cultural area of significance at the London level.

20. The proposed meanwhile use would draw additional visitor number to the nearby Wembley town centre,

in addition to creating employment opportunities for Brent residents, and enhancing Wembley's cultural offer in accordance with the policy context set out in the principle of development section of this report.

21. The site is located within an area which is very well connected to the public transport network, by rail, bus and London Underground. This is discussed further in the 'Transport and Highways' section of this report.
22. The applicant has set out that the operator of the proposed football pitches would allow subsidised use (free of charge) for one of the pitches for use by community/youth groups and local schools in order to encourage sports participation in the local area, in line the timetable set out below:

	Proposed Timetable and Hours of Operation						
	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
Community Groups	10:00-12:00	10:00-12:00	10:00-12:00 14:30-16:30	10:00-12:00	10:00-12:00	N/A	10:00-12:00
	14:30-16:30	14:30-16:30		14:30-16:30	14:30-16:30		

23. The above offering mirrors the previous community use arrangements that were agreed for the previous 5 a side pitches which were located adjacent to the proposed new pitches under application ref: 16/5515. When considering the temporary nature of the development, this is considered to appropriately maximise community benefit for the meanwhile use, and is a notable planning benefit. Compliance with the above arrangements would be secured by condition.
24. Overall, given the scale of development anticipated to be brought forward across plots NE04, NE05 and NE06 and the likely time required to secure and implement detailed consent for the redevelopment, the meanwhile use of the land for a 3-year period to enhance the community and cultural offer of the Growth Area is supported in principle, and in accordance with the policy context set out above.

### **Safety and Security Considerations**

25. London Plan Policy D11 states that development should include measures to design out crime that (in proportion to the risk) deter terrorism, assist in the detection of terrorist activity, and help mitigate its effects. Policy DMP1 f) of the Local Plan seeks to ensure that developments are safe, secure and reduces the potential for crime.
26. Safety and security are a key consideration for the operation of the proposed meanwhile uses and is addressed both by Quintain, as landlord of the site, and by the individual tenants. In addition to the Estate Operational Management Plan prepared by Quintain, each operator has submitted their own Operational Management Plan which sets out the safety and security measures relevant to their proposed meanwhile use. These documents were reviewed by Counter Terrorism Security Advisers (CTSA) to ensure that the measures proposed are proportionate and robust.
27. Of the two proposed uses, Plot 02, which would host the indoor leisure, entertainment and events venue, is expected to generate the greater footfall in terms of customers, staffing, and servicing. As such, the Operational Management Plan for Plot 02 has been designed to reflect this higher level of activity, with enhanced crowd management, security staffing, and ingress/egress procedures. It is worth noting that the operator for Plot 02 previously managed the Secret Cinema event space which was located within the Fulton Road industrial units for several years and therefore are aware of, and understand what is required to ensure the safe and secure management of such an event space.
28. The Operational Management Plan for Plot 02 confirms that the maximum capacity of the building is 460 people at any one time (including staff) which would be managed through ticketing with a staggered entry/exit. The venue would be arranged with activity zones, and each area would be stewarded and managed to prevent overcrowding. The document also sets out the approach to security and while it does not specify the installation of an electronic access control system, there will be the combination of:
  1. *Controlled Access*
    - Ticketed entry only – no walk-ins, no re-entry once patrons leave.
    - Bag and personal searches at the entrance, with a strict prohibited items list (weapons, large bags, alcohol, etc.).

## 2. Security Personnel

- SIA-licensed staff and stewards are present throughout the site.
- Daily briefings include emergency evacuation, suspect package (HOT procedure), and acid attack response.
- Staff are trained to implement rapid lockdown measures by closing gates and restricting access.

## 3. Communication Systems

- Two-way radios with earpieces for all staff, checked daily for coverage.
- PA system and signage used to direct audiences in real time.
- A production office acts as the command hub, with a dedicated site mobile phone available for emergency liaison with police and local residents.

## 4. Ingress/Egress Management

- Only one main entrance with ticket scanning and security checkpoint.
- Staggered entry/exit (15-minute slots) avoids mass crowd surges, making lockdown or dispersal easier to manage.
- External queuing is prohibited, reducing vulnerability outside the site perimeter.

## 5. Emergency Procedures

- Staff briefings cover emergency evacuation and incident response.
- Clear routes and signage for rapid evacuation or lockdown.
- Incident reporting protocols ensure swift escalation to emergency services.

29. Further comments were made by the Designing Out Crime Officer regarding the type of cycle parking stands, the use of temporary planters and encouraging cashless venues. These comments were forwarded to the applicants for further consideration and were sufficiently addressed. Together these provide the ability to enact a dynamic lockdown if a serious incident occurs nearby. The Metropolitan Police have reviewed these measures and are satisfied with the security protocols in place, confirming that they meet their requirements, effectively designing out crime while providing robust counter-terrorism protections. Nevertheless, more site-specific details of these measures would be required, by way of a submission condition regarding the proposed counter-terrorism measures.

## Design, Character and Impact on the Street Scene

30. Policy DMP1 sets out the need for development proposals to be:

- (a) of a location, use, concentration, siting, layout, scale, type, density, materials, detailing and design that provides high levels of internal and external amenity and complements the locality.
- (f) safe, secure and reduces the potential for crime

31. Policy BD1 highlights the need for all new development must be of the highest architectural and urban design quality. Innovative contemporary design will be supported where it respects and complements historic character but is also fit for the future.

32. In delivering high quality design, development proposals will be expected to show how they positively address all the relevant criteria within London Plan design policies and the Brent Design Guide SPD1.

33. SPD1 states that the use of durable and attractive materials is essential in order to create development that is appealing, robust and sustainable and fits in with local character.

34. The development proposes five no. 600sqm football pitches (Plot 01), a 135sqm single-storey pavilion building (both within Plot 01) and a 3600sqm leisure, entertainment and events venue (Plot 02).

## Football Pitches

35. With regard to Plot 01, the proposed elevations show the football pitches would have a 1.2m high green rebound board, with green galvanised and plastic-coated weldmesh (at a height of 1.8m) and black netting on top (at a height of 2m), resulting in a total height of 5m. The proposed lighting columns would have a maximum height of 8m. This is typical design for outdoor sport pitches, is considered to be well designed and is not considered to unduly harm the character or appearance of the site or the wider street scene.

### Football Pavilion Building

36. With regard to the single-storey pavilion building, the proposed drawings show a square footprint, with a mono-pitched roof. This building would have an eaves height of 3.1m and maximum height of 3.3m. The proposed elevations show the building would be finished in teak coloured cladding on all sides, with anthracite roof, windows and doors. There would also be a small canopy over the entrance door. The layout of the unit is considered to be acceptable, in association with the football pitch use. There is no objection to these works in terms of character or appearance.

### Leisure, Entertainment and Events Venue

37. With regard to Plot 02, the proposed leisure, entertainment and events building would be 40m wide and 90m in depth, resulting in an external floor-area of 3600sqm. The proposed elevations show the building would have a shallow dual-pitched roof, an eaves height of 11m and maximum height of 12m with gable-ends on both sides. The proposed plan shows several single-door & double-door fire exits along the flanks of the building, with 5m wide roller-shutters on each end and associated ramps and steps. The building would be primarily clad in black, galvanized steel panels, broken up by equally distributed silver aluminium/silver drainpipes/legs. The roof would be comprised of white PVC sheeting and the doors would be constructed in anthracite aluminium frames. Overall, the proposed building is considered to be of an acceptable appearance for the temporary use proposed.

38. The proposed buildings are not considered to be of a height that is excessive in its scale when considered against the surrounding sites building heights. The proposed development would not impact any strategic views. The internal layout of the unit would be open-plan to allow for various events, leisure and entertainment uses.

39. Brent's Urban Design Officer reviewed the proposal and concluded that the scheme is acceptable in terms of urban design. Although further clarification was sought on the extent of the access/service road arrangement and parking and pedestrian entrance on Tipatone Walk. The existing boundary treatments have also been considered with regard to highway safety matters, further below in this report.

40. The proposed plan indicates a small section (34m wide) of timber fencing, which is to be replaced with palisade fencing to match the existing boundary treatment, which would match the existing fences in this area and be painted in green to blend with the surrounding landscaping. As the majority of the existing boundary treatments are to remain, this part of the proposal is not considered to have a significant detrimental impact on the wider streetscape. The siting and appearance of the development is therefore supported in planning terms and complies with DMP1.

41. Although consent is sought for a temporary three-year period to allow for flexibility, the meanwhile uses may only be in-situ for one year (after which both the tenant and landlord have a break clause in the lease). Due to the temporary nature of the proposal and given that the application is identified for major residential development in the long-term, as part of the Wembley Park Masterplan (ref: 15/5550), significant enhancements to the frontage, while desirable, are not proportionate or viable, in this case.

42. Overall, the proposal is considered to be acceptable in terms of its general siting and appearance and is therefore supported in planning terms, and complies with Policy DMP1.

### **Impact on Nearby Residential Amenity**

43. It is always necessary for developments to take into account the residential amenity of neighbours and impact on the environment. Local Plan Policy DMP1 seeks to ensure new development does not unacceptably increase neighbours' exposure to noise, light and general disturbance.

### Loss of Light, Outlook & Privacy

44. Any development is required to maintain adequate levels of privacy and amenity for existing residential properties, in line with the guidance set out in SPD1.

45. The nearest residential properties are located to the west of the application site and are predominantly used as student accommodation. At a distance of 11m from the site boundary and 18m from the nearest lighting column.

46. As previously mentioned, to the north of the site are warehouse buildings on Watkin Road and to the east

of the site is Bubble Planet, both of which are non-residential uses. To the south of the site on First Way, the residential block (Wembley Ark Building) is approx. 37m from the site boundary and 80m from the entertainment building. Similarly, on Engineers Way the residential block (Canada Gardens) is approx. 38m from the site boundary and 74m from the entertainment building. To the west of the site are the residential blocks on Tipatone Walk, Marshal Walk and Marley Street (Plots NE01, NE02 & NE03). NE01 is approx. 10m from the site boundary and 17.2m from the football pitches. NE02 is approx. 11m from the site boundary and 28.3m from the football pitches. NE03 is approx. 90m from the site boundary and the entertainment building.

47. The proposed development would have a generally immaterial impact upon the level of daylight/sunlight received by the nearby residential properties along Tipatone Walk, Marshall Walk or Fulton Road. Due to the size and location of the proposed structures, they are not considered to result in an adverse impact on the overall living conditions of the neighbouring occupiers. The application therefore complies with the requirements of Policy DMP1 in terms of neighbour amenity.

#### External Lighting

48. The proposed height of the columns for the football pitches would be 8m high. The application has been supported by external lighting information provided by Polaris Light, which was reviewed by the Council's Environmental Health Team. The lighting assessment demonstrates that the lux level at the nearest residential premises would be 5 lux. As such, the light spill from the floodlights would not result in harm to the residential amenity of nearby properties. A condition would be recommended to ensure lighting is carried out in accordance with the details and mitigation submitted and limit the hours of use. The application is therefore acceptable in this regard.

#### Noise Impact

49. London Plan Policy D14 states new noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses.
50. Some potential sources of noise associated with the proposed development could derive from player's voices, balls hitting the mesh fencing, referee whistles and general comings and goings from the venue, although sporadic would occur throughout the day. As outlined the overall operational hours of the pitch are as follows:
  - Sunday to Thursday 08:00 to 21:00
  - Friday and Saturday 08:00 to 22:00
51. Although, there is the potential for noise associated with play to disturb residents, the applicant refers to the land previously functioning as four 5-a-side football pitches (under ref. 16/5515), which successfully operated for 4 years. They are of the opinion that it is unlikely that the noise impact here would be significantly greater than when the pitch was used for play purposes. However, since that 2017 approval, more residential developments have been erected around the application site. It is noted that these buildings have been designed to be sound limiting to protect the amenity of the residents from noise and disturbance from Wembley Stadium and other surrounding uses. Nevertheless, any proposals for new development, including previously approved uses, would be assessed against the relevant planning policies documents and guidelines.
52. The application was submitted with a Noise Assessment [2523418-PGR], prepared by Sharps Redmore, dated 5th November 2025, which was reviewed by the Council's Environmental Health Team. The noise assessment follows specific objective guidelines as set out in the Sport England Design Guidance: 'Artificial Grass Pitch (AGP) Acoustics - Planning Implications (2015). The assessment advises that the Sport England guidance for noise levels from sports pitches should be no more than 50dB LAeq 1 hour, 1m from the nearest residential façade. The assessment also uses World Health Organisation (WHO) guideline values whereby the limits are at the lowest level that would result in any effect. Compliance with LOAEL (Lowest Observed Adverse Effect Level) is considered to be a robust aim, and for the proposed use, this is 50dB LAeq,1hr. SOAEL (Significant Observed Adverse Effect Level) refers to the noise level above which significant negative impacts on health and quality of life occur, a key concept in the UK's Noise Policy Statement for England, and this is >55dB LAeq,1hr for the proposed use. The noise assessment clearly demonstrates that predicted levels would remain below the SOAEL of 55dB LAeq,1hr (at 54dB). This threshold is specifically designed to protect residential amenity, and compliance indicates that the proposed use would not result in significant adverse effects to the residential amenity of the

neighbouring properties.

53. It is acknowledged that the proposed development would result in some noticeable noise to nearby residential properties. However, the level of additional noise impact when considering the proposed mitigation, as well as the restricted hours of use until 10pm is not so significant to resist the proposed development. Furthermore, the wider social and community benefits associated with the proposed development in terms of sporting facilities, health and wellbeing are considered to outweigh the level of additional noise impact. Provided the noise mitigation measures are implemented, the Environmental Health Officers have no objections in terms of noise. The application is therefore acceptable in this regard.
54. Overall, it is considered that in this instance the proposal would not cause any substantial harm on the amenity of the nearby student's accommodation blocks, or the neighbouring residential properties from the site and therefore the proposal is considered to be acceptable on amenity grounds.

### **Transport and Highways Considerations**

55. Fulton Road is a local commercial access road, where on-street parking & loading is generally prohibited at all times. The adjoining roads are not heavily parked at night. The application site benefits from a 10m wide access with 8m radius kerbs on Fulton Road at the east-end & an 8m wide access with 6m radius kerbs on the west-end.

#### **Car Parking**

56. Car parking allowances for leisure uses, as set out in Appendix 4 of the adopted Local Plan, restrict provision to operational purposes, disabled people and taxis, coaches and servicing. The standards also state that use should be made of existing publicly available parking spaces before making any on-site provision.
57. The proposed site layout originally included twelve spaces, comprising six wide bays for disabled parking and six drop-off bays. Whilst the provision for disabled parking is fine, the Brent's Highways Service considered no need for the drop-off bays, unless access is specifically limited to taxis (and potentially coaches). It was therefore recommended that these drop-off spaces be designated for use by taxis only and reduced in number, with a suitable means of access restriction to the site to enforce this. The applicants amended the proposal to reduce the number of dropped off spaces from six to five and explained that the designated drop off-spaces are proposed as a direct response to the operational issues observed at Bubble Planet which, despite being advertised as a car free attraction, has caused issues on the local highway with visitors picking up/dropping off. With the potential increase in activity resulting from this application, especially the fact that a high proportion of visitors would be families with young children, it is considered such a facility is operationally necessary to allow guests to be dropped off before proceeding to the Red Car Park and then again for pick up. To ensure effective management:
  - Bays will be clearly marked as drop-off/pick-up only with a maximum 15-minute waiting period.
  - Enforcement will be carried out via on-site ANPR cameras and UK Parking Control staff.
58. These measures are considered to be acceptable. Additionally, any staff or customer parking for these uses, including for general set-down and pick-up, should be directed to use the existing car parks in the wider area, such as the Pink and Red car parks.
59. Vehicular access and egress for the site would be via the two existing site accesses from Fulton Road, with a westbound one-way road proposed to link these two accesses. The access widths and kerb radii were originally constructed to access the service yards for the former retail park, so are far more generous than is necessary to serve these proposals. However, whilst the resultant significant crossing widths for pedestrians are not ideal for safe and convenient movement along Fulton Road, these meanwhile uses are only for a temporary period of three years. However, some temporary lining on either side of the crossovers to signify a reduced vehicular access width could be considered. The applicants confirmed that temporary lining would be provided adjacent to the crossovers to visually narrow the vehicular access widths as shown on drawing TPHS-441-DR-001 Rev A.
60. Within the site, the Transport Statement submitted suggests that the road would be demarcated on the ground, which implies that lining would be used to define its width. Nevertheless, the indicated width of 6m is more than sufficient for a one-way route, as demonstrated by the tracking diagrams submitted with the Transport Statement. A reduced general width of about 3.5m-4m was therefore recommended to the

applicant, to discourage additional parking along its length and provide more space for safe pedestrian movement. Furthermore, large areas of hardstanding space would be retained to either side of the one-way road that could potentially be used for unauthorised parking if they are not clearly defined as pedestrian or landscaped areas. To this end, the applicants confirmed that a reduced width would be provided. The internal one-way access road would be demarcated at 3.7m, as shown on drawing TPHS-441-DR-001 Rev A. This would discourage unauthorised parking, enhance pedestrian safety, and remain sufficient for vehicle tracking as demonstrated in the Transport Statement.

61. With regard to unauthorised parking, the Estate Operational Management Plan confirms there would be regular Estate Protection Officers patrolling of the public realm with regard to safety and security matters and that parking on the site would be managed by UK Parking Control (supported by relevant signage). It is further confirmed that ANPR cameras would be used and any unauthorised vehicles would receive a Penalty Charge Notice (PCN). This framework would ensure the robust management of parking, servicing, and access across the site. This is considered to be appropriate and compliance with the relevant operational management plans would be secured by condition.
62. With regard to the access/service road arrangement, design updates were made to the site layout during the course of the application to address highway safety matters. The proposed road layout now ensures a clearly defined one-way route between the two existing entrance gates onto Fulton Road, meeting both servicing and access requirements in line with highway design standards. The accessible parking provision meets Brent's requirements; however, the number of drop-off spaces was also reduced from six to five to limit frontage impact.
63. Therefore, and on balance when considering the wider public benefits of the scheme, the proposed level of provision is acceptable in this instance.

#### Bicycle Parking

64. Policy T5 of London Plan sets out the need to secure the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. This is set out within Policy BT1 of Brent's Local Plan that highlights the need for developments to include cycle parking, in line with or exceeding London Plan standards.
65. Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.
66. The London Plan requires a minimum of one long-stay bicycle parking space per eight staff, plus a short-stay space per 100sqm for the sports pitches and per 30 seats for the venue. Staffing levels for the event venue are understood to total about 40 staff, with three full-time staff proposed for the football centre. The plans show two bicycle spaces for the football centre staff and five for event venue staff, which is in line with standards.
67. For short-stay parking, 30 covered bike stands (60 spaces) are shown alongside the pedestrian and cyclist entrance to the site and this is sufficient to meet standards, based upon the floor area of the football pitches and the anticipated maximum attendance at any time in the event space. The use of 'London Cycle Stands' stands also allows non-standard bicycles to be accommodated, which is welcomed.
68. The application is therefore acceptable in this regard.

#### Servicing & Deliveries

69. There are no specific servicing requirements for these uses. However, day-to-day deliveries are generally likely to be limited to food and drink and waste collection, with the event venue proposed to stage exhibitions that would require few regular deliveries once set up. The Transport Statement confirms that the proposed one-way access road and drop-off area would be able to accommodate deliveries outside of normal operating hours without difficulty.
70. It is noted that the proposed site plan shows a delivery van in the ancillary area for Plot 02 at the southern end of the building. However, no reference is made in any of the documents regarding use of this area for servicing and it is unclear from the plans how vehicular access to this area would be achieved anyway. Clarification on this point was sought and the applicants have confirmed that the ancillary area to the

south of Plot 02 would be accessed via a dedicated 4m wide service route to the east of Plot 02. Whilst the submitted Layout Plan (3674 LJA NE 00 D A 1104 P02) shows a number of emergency exit ramps along this route, these are not permanent structures and would only be deployed from within the building in the case of an emergency evacuation. A revised Proposed Layout Plan (3674 LJA NE 00 D A 1104 P03) was submitted alongside this response note clearly showing the service route to be unobstructed. Furthermore, drawing TPHS-441-TR-001 Rev D provides swept path tracking for a rigid vehicle servicing Plot 02 accessing the ancillary area to service the southern façade of the building. Again, Brent's Highways Service confirmed that this has sufficiently demonstrated safe vehicular access. Nevertheless, further details of long-term maintenance and management could be requested as per a submission condition for a Delivery and Servicing Management Plan, subject to a grant of planning permission.

#### Pedestrian Safety

71. Pedestrian and cyclist access into the site is proposed from the west via Marshall Walk and Tipatone Walk, with links to Engineers Way to the south via Union Park and to Rutherford Way and Olympic Way to the west via Allegro Walk. These traffic-free approaches to the site provide good quality routes for pedestrians and cyclists from nearby stations and bus stops, to help support active travel to the site.
72. The plans appear to show retention of hoardings along most of the western boundary of the site though, with a 5m wide "walkway" shown for access (it is assumed that this suggests that it will be covered). A pedestrian comfort assessment in the Transport Statement shows that the proposed entrance width of 5m width is sufficient to accommodate predicted flows, although a more open boundary alongside Tipatone Walk would be welcomed to further improve pedestrian permeability from the west. The applicants confirmed that the walkway is not proposed to be covered. However, the boundary treatment along the western edge is required for security and screening of ancillary areas and football pitches located on Plot 01 and to the wider site, particularly when closed to the public. It also supports wayfinding by directing visitors to a single controlled entry point (making use of both digital and physical wayfinding media). Whilst visitors may arrive from the north, down Tipatone Walk, it is expected that a high proportion will also arrive from the south and west having parked in the Red Car Park and/or visited other parts of Wembley Park (e.g. LDO/Box Park/Union Park etc.) and the proposed 5m walkway provides sufficient capacity as confirmed in the pedestrian comfort assessment.
73. Within the site, a large triangular area of public realm is proposed between the two plots. However, the plans lack any detail regarding how this might be laid out, such as with seating, bins, planting, artificial grass surfacing etc. to provide an attractive space to spend time in, as opposed to a large blank expanse of tarmac. Further landscaping details for this area would therefore be welcomed. The applicants acknowledged the importance of creating an attractive public realm is recognised and the treatment of this area is still being considered with the incoming tenants. The scope of any landscaping features would need to recognise the temporary nature of the proposed uses. Subsequently, additional landscape details would be secured via condition.
74. Along the northern side of the site, there are also no demarcated pedestrian routes into the site from Fulton Road alongside the vehicular route, whilst the drop-off parking bays create a pinch point for pedestrians past the football pitches. The applicants confirmed clearly demarcated pedestrian routes into the site would be provided and coordinated with the boundary treatments to Bubble Planet, ensuring strong connectivity between the two meanwhile uses. Adjustments were made to the proposed site layout plan which, in conjunction to the lining to be made to access/egress points, would improve pedestrian flow, as shown on (3674 LJA NE 00 D A 1104 P03).
75. The pavilion for the 5-a-side football centre is also shown positioned on the eastern side of Plot 01, close to the parking spaces and well away from the pedestrian entrance. While this results in a less direct access route for pedestrians, the relocation of the pavilion to the western side of Plot 01 would not be feasible due to underground chamber access requirements and localised level changes. However, wayfinding and signage would be provided to ensure pedestrian routes to the pavilion are clear, safe, and convenient which is acceptable. Details of wayfinding would be secured by condition.
76. Similarly, the western entrance location provides a secure single point of access to the site. While on plan, it may appear tucked away, directional signage would again be provided (both digital and physical) to ensure legibility within the wider streetscape and alignment with pedestrian routes through Union Park. It is not considered there would be a conflict with the proximity of the entrance to the community use at ground floor level in Luna.

#### External Lighting

77. The proposed 5-a-side football pitches would be provided with 300W floodlights on 8m high columns in each corner to allow use in the evenings. A lighting report has therefore been produced. In terms of light spillage, this confirms that spillage over the nearest public highway (Fulton Road) would not exceed 5 lux, so there are no concerns with regard to lighting glare.
78. However, the lighting report does not include illuminance details for the access road area to the Fulton Road frontage of the site or the large expanse of public realm, where a series of new lighting columns appear to be shown to complement two existing columns that are to be retained. The applicant has confirmed that lighting of the access road and public realm would be in accordance with the Wembley Park Estate lighting standards ensuring the area is well-lit and consistent with other public realm areas across the Estate. In this regard, illuminance levels will be maintained at:
  - Access road: 15 lux (pre-curfew) / 7.5 lux (post-curfew)
  - Public realm: 10 lux (pre-curfew) / 5 lux (post-curfew)
79. Both the Transport Team and Environmental Health are satisfied with the proposed lighting levels and these would be secured through a suitably worded compliance condition attached to any planning permission.

#### Trip Generation

80. To determine the likely impact of the proposals on wider transport networks, the submitted Transport Statement includes a trip generation assessment. The lack of comparable sites on the TRICS database has meant that trip and modal share estimates have also had to be derived partly from consideration of surveys of other sites in the Wembley Park area, such as the Bubble Planet operation immediately adjoining this site (similar in terms of capacity and dwell-time to the proposed exhibition venue on Plot 02).
81. For both uses, most activity would take place at evenings and weekends, so any overlap with background movements during the standard weekday peak hours is expected to be fairly limited.
82. Combining the predicted trips for the two uses over the busiest hour (assumed to be at the weekend) would give an estimated trip generation of 432 arrivals and 432 departures per hour by all modes of transport. The majority of these movements would be to and from the exhibition space on Plot 02 and the nature of the use would mean that arrivals and departures would be reasonably evenly spread across each hour, rather than seeing a sudden surge of departures at the end of an event (as would be the case for use as a concert venue).
83. It is also expected that a high proportion of visits would be linked with visits to other destinations in the Wembley Park area.
84. With just disabled and drop-off car parking proposed within the site, both uses are expected to have low levels of car use, with about 3% of trips expected by car drivers (based on surveys of existing modal share in the Wembley Park area). This would equate to 26 car trips in the busiest hour (plus a handful of additional taxi movements), which is not considered to be significant enough to cause any concerns in terms of road capacity. Furthermore, those that do drive would primarily use nearby public car parks, which would help to disperse traffic over a wider area, rather than concentrating traffic flows along Fulton Road to directly access this site.
85. The overwhelming majority of visitors to the plots are expected to use public transport, with 482 trips by Underground, 232 trips by bus and 34 trips by rail anticipated, based on modal share figures for Wembley Park.
86. Underground trips would be predominantly via Wembley Park, which is geared up to cater for events with 90,000 spectators at Wembley Stadium. There are therefore no concerns with regard to station capacity and the high frequency of services from the station on the Jubilee and Metropolitan lines means that the number of additional passengers on any train would average less than four (or up to eight if all passengers travel solely to and from Central London).
87. For rail services, the Transport Statement notes that if all 34 passengers per hour travel through Wembley Stadium station, then 4-5 additional passengers per train would be expected. This again assumes that all passengers are coming from the same direction. It is also likely that some rail

passengers would instead travel through the more distant Wembley Central station on Lioness and Southern train services, so the likely impact on Chiltern line services is likely to be less than stated. Nevertheless, the predicted impacts are not expected to cause any difficulties.

88. For bus services, about 40 bus services serve the vicinity of the site in each direction. A total of 116 arrivals and 116 departures are anticipated per hour and when split across these services, this would amount to less than two additional passengers per bus on average.
89. In all of the above cases, the peak flows would all be outside of network peak hours when buses and trains are less heavily occupied, so there are no concerns with regard to public transport impact.
90. Finally, to help to promote the use of sustainable transport modes, Wembley Park's Travel Plan Co-ordinator will liaise with the operators to encourage use of non-car modes of transport, through the provision of promotional materials and information to visitors, improved signage to the site and operation of a booking system for the disabled car parking spaces. This is welcomed and as the uses are proposed for only three years at present, there is not considered to be any need for ongoing monitoring of travel patterns.

## **Green Infrastructure**

### Trees

91. London Plan Policy G7 sets out the need for development proposals to ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.
92. Policy BGI2 highlights in the case of major development to make provision for the planting and retention of trees on site. Where retention is agreed to not be possible, developers shall provide new trees to achieve equivalent canopy cover or a financial contribution for off-site tree planting of equivalent canopy cover will be sought. Replacement canopy cover will be measured as total canopy area of new trees at time of planting being equal to canopy area of existing mature trees proposed for removal.
93. The tree survey submitted identifies five existing trees adjacent to the application site, with no trees on-site. The off-site trees growing within the adjacent Wembley Point site are covered by a Tree Preservation Order (TPO). At the time of the report completion, one of the individual apple trees protected by the TPO has since failed or has been removed and is no longer present.
94. None of the off-site trees would need to be removed in order to accommodate the proposed development. Nevertheless, the Council's Tree Officer requested further information regarding the Root Protection Area of the existing trees on and surrounding the application site. The new metal palisade fencing would be in close proximity to several smaller trees. The agents confirmed that there are two relatively poor-quality, self-seeded trees that are likely to be impacted by the replacement fencing. However, the works are expected to be undertaken without any significant impact upon them. It is also noted that under the approved Wembley Park Masterplan (ref: 15/5550 (as amended)) all of the trees along this boundary (Fulton Road) are scheduled to be removed in due course. The fencing proposals are therefore temporary in nature and would not prejudice the delivery of the longer-term redevelopment of this part of Wembley Park.
95. A compliance condition is recommended that requires all works in close proximity to the existing trees be undertaken in accordance with BS 5837:2012, to safeguard the health of these trees.

### Ecology

96. London Plan Policy G6 highlights the need for Sites of Importance for Nature Conservation (SINCs) to be protected.
97. Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:

- 1) avoid damaging the significant ecological features of the site
- 2) minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
- 3) deliver off-site compensation of better biodiversity value.

98. The application site is not located within a SINC; therefore, a Preliminary Ecological Appraisal is not required. Furthermore, there are no concerns regarding lighting impacts on bats, given the urban nature of the area.

#### Biodiversity Net Gain (BNG)

99. Biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act (TCPA) 1990, for major applications made on or after 12th February 2024. Non-major developments are also required to achieve the net gain in biodiversity for applications made on or after 2nd April 2024.

100. This sets out the need (subject to some exceptions) that every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met ("the biodiversity gain condition"). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits.

101. Local Plan Policy BGI1 (d) sets out the need for all developments to achieve a net gain in biodiversity and avoid any detrimental impact on the biodiversity of an area.

102. The application form submitted outlines that the proposal is not subject to the statutory requirement to deliver a 10% Biodiversity Net Gain. This is because it is subject to the de minimis exception whereby less than 25sqm of habitat would be impacted by the development. The site has a sealed surface with limited biodiversity value and the exception as detailed within the application form is considered to be valid.

103. Notwithstanding this, the proposal would still be required to deliver a biodiversity net gain in accordance with Policy BGI1. As noted above, the site has limited biodiversity value. Furthermore, the proposal is temporary in nature and extends across a substantial area of the site. Notwithstanding this, the planning statement submitted sets out that raised planters would be utilised across the site, and details of planting would be secured by condition. This is considered to be suitable within the context of Policy BGI1 and noting the temporary nature of the development.

#### Urban Greening Factor (UGF)

104. Policy G5 highlights the need for an urban greening factor score of 0.3 to be achieved on non-residential developments.

105. The application has not provided specific calculations on this matter. However, the proposal lies within an existing area of hardstanding and the wider masterplan site would secure an urban greening factor across the wider site in line with London Plan requirements. Acknowledging the temporary nature of development, the application is considered acceptable in this regard.

#### **Energy and Sustainability**

106. Policy S12 of London Plan sets out the need for major developments to be net zero-carbon in terms of reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:

1. be lean: use less energy and manage demand during operation
2. be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
3. be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
4. be seen: monitor, verify and report on energy performance.

107. Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.

108. Policy SI2 sets out that a minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either:

1. through a cash in lieu contribution to the borough's carbon offset fund, or
2. off-site provided that an alternative proposal is identified and delivery is certain.

109. Policy BSUI1 highlights the requirement for major developments to connect to or contribute towards a decentralised energy system unless it can be demonstrated that such provision is not feasible or the proposed heating system is 100% renewable. These policies aim to reduce lifetime carbon emissions and future-proof developments but for a meanwhile use, the intended lifetime is very short, so applying the full requirements would be disproportionate to the policy intent, given that both the London Plan Policy HC5 (Supporting London's culture and creative industries) and Local Plan Policy BE4 (Supporting Strong Centres) support the meanwhile use of vacant and underutilised land to stimulate vibrancy and viability of growth areas.

110. Policy BSUI1 highlights the requirement for major developments to submit a Sustainability Statement demonstrating how sustainable design and construction methods have been used to enable the development to mitigate and adapt to climate change over its intended lifetime.

111. Although a Sustainability Statement has not been submitted with the application, a number of the applicant's submission documents outline sustainability benefits, which would be incorporated into the scheme, as listed below.

112. Given the temporary nature of the proposals and their limited operational lifespan, it is acknowledged that connecting to the Wembley Park district heat network for potentially what could be a one-year use is technically and financially unviable. With regard to BREEAM, the certification involves permanent building fabric and systems and so is not appropriate to assess temporary structures. However, the proposal does seek to adopt a pragmatic approach, incorporating measures to minimise emissions and promote active travel alongside design considerations that support the principles of sustainable development. These include:

- Promoting sustainable transport options (given the site's accessible location);
- Making best use of a previously developed site and existing infrastructure (hardstanding, drainage, lighting etc.) to minimise embodied carbon;
- Making use of modular building designs which will allow for future dismantling and reuse;
- Making use of energy-efficient lighting and equipment e.g. selecting models with an A+++ rating where new kitchen appliances are required or labelled by Energy Star or Ecolabel for office equipment;
- Installing water efficient sanitary ware in accordance with Building Regulation requirements;
- The Plot 02 building would use a highly efficient HVAC (Heating, Ventilation and Air Conditioning) system, which would automatically control in an energy efficient manner, the amount of heating, cooling, ventilation of air conditioning to defined areas within the building;
- Seeking waste minimisation during the installation, operation and later the removal of the meanwhile uses;
- Retaining existing landscaping and seeking to provide temporary landscaping improvements within the site; and
- Making use of existing drainage infrastructure to ensure the risk of flooding on site will not increase (or flood risk elsewhere).

113. When considering the temporary use of the site for the development proposed, all of the measures listed above are considered to be acceptable and would suitably contribute towards reducing carbon emissions for the lifespan of the development.

## **Environmental Considerations**

114. Policy DMP1 (g) highlights that development will be acceptable provided it does not unacceptably increase, and where possible reduce, exposure to flood risk, noise, dust, contamination, smells, waste, light, other forms of pollution and general disturbance or detrimentally impacting on air or water quality.

## Air Quality

115. Policy BSUI2 sets out that major developments within Growth Areas and Air Quality Focus Areas are required to be Air Quality Positive and elsewhere Air Quality Neutral. Where on site delivery of these standards cannot be met, off-site mitigation measures would be required.

116. The application site not located within the Wembley Growth Area and is within an Air Quality Management Area. Whilst this application falls into the category of major development (both due to the size of the application site and the level of non-residential floorspace being delivered) permission is sought on a temporary basis for two meanwhile uses for a period up to 3 years, intended to activate this previously developed site, prior to its permanent redevelopment as part of the Wembley Masterplan development. As such, permanent air quality measures are not viable. Nevertheless, wherever feasible the scheme would incorporate practical, short-term measures to reduce emissions and improve air quality by reducing emissions from transport and energy; enhancing air quality through temporary green infrastructure; and managing dust during construction and decommissioning as follows:

### *Transport and Access*

117. The proposal is primarily as car-free, with the exception of six (6) accessible parking spaces and five (5) pick-up/drop-off facilities. Due to the site's accessible location (PTAL 4) the development would promote public transport journeys and pedestrian priority linking to existing pedestrian routes, seeking to prioritise pedestrian movement to reduce reliance on private vehicles.

118. In addition to this, secure cycle parking would be provided for both visitors and staff to encourage active travel. The on-site accessible parking and pick-up/drop-off areas would be limited to essential operational use only, reducing traffic volumes. As is set out in the Transport Statement submitted with the application, the operators of the proposed meanwhile uses would be advised to instruct all delivery vehicles whilst stationary on site to turn off their engines so as to not unnecessarily contribute to air quality issues at and around the site.

### *Green Infrastructure*

119. As discussed above, the existing landscaping along the Fulton Road frontage would be retained to maintain/improve air quality (and visual amenity), which would help act as a natural air quality filter and reduce dust migration from the site. In addition to this, new planting would be introduced to the central public realm area within the site (details of which would be secured by a submission condition). It is noted to the south-west of the site, the applicants have already delivered Union Park North, which includes over 1300 new trees and over 30 acres of public realm, which is welcomed as high-quality green infrastructure in the locality.

### *Energy and Operations*

120. The Applicants have also confirmed that all site operations would use electric and/or low-emission equipment wherever feasible and furthermore, the scheme would avoid the use of combustion-based heating or generators.

### *Dust and Construction Management*

121. The construction of the meanwhile uses is primarily non-intrusive and therefore generates minimal dust; however, wherever required suitable and sufficient means of suppressing dust would be provided and maintained during the construction and later removal phases.

122. The application is therefore acceptable in this regard.

## **Flooding**

123. Policy BSUI3 highlights that proposals requiring a Flood Risk Assessment must demonstrate that the development will be resistant and resilient to all relevant sources of flooding including surface water. Proposed development must pass the sequential and exceptions test as required by national policy. The design and layout of proposals requiring a Flood Risk Assessment must contribute to flood risk management and reduction and:

- f) minimise the risk of flooding on site and not increase the risk of flooding elsewhere;
- g) wherever possible, reduce flood risk overall;
- h) ensure a dry means of escape;
- i) achieve appropriate finished floor levels which should be at least 300mm above the modelled 1 in 100 year plus climate change flood level; and

j) not create new basement dwellings in areas of high flood risk.

124. Proposals that would fail to make appropriate provision for flood risk mitigation, or which would increase the risk or consequences of flooding, will be refused.

125. The site allocation Policy BCSA8 highlights that more vulnerable uses should be restricted to areas of lowest flood risk and on upper floors. Ground floors should be designed to be resistant and resilient to flood risk. Development must be informed by a detailed Flood Risk Assessment and Drainage Strategy, reduce flood risk overall and not increase the risk of flooding on adjoining sites.

126. Parts of the application site are located within Flood Zone 3 for surface water flooding, and within a high-risk area of surface water flooding. A Flood Risk Assessment (FRA), alongside its accompanying appendices, have been submitted with the application.

127. The FRA has been reviewed by the Local Lead Flood Authority (LLFA). The FRA submitted identifies low fluvial and surface-water flood risk, and the intention to connect to existing surface-water infrastructure serving adjacent phases of Wembley Park.

128. Given the short operational duration and absence of new permanent buildings of significant footprint, the LLFA raise no objection in principle, subject to run-off rates and attenuation details being secured via a proportionate surface water drainage condition. It has also been confirmed that inspections, maintenance and management of main storm sewers and chambers inclusive of pipework from paved areas and buildings (excluding internal building drainage) will be undertaken every year. This is considered to be acceptable.

#### Sustainable Drainage

129. Policy BSUI4 highlights the need to achieve greenfield run off rates for surface water, unless clearly justified by the applicant. Major development proposals or minor developments and changes of use which would impact on the current drainage regime must be accompanied by a drainage strategy.

130. Proposals that would fail to make adequate provision for the control and reduction of surface water run-off will be refused.

131. Proposals for minor developments, householder development, and conversions should make use of sustainable drainage measures wherever feasible and must ensure separation of surface and foul water systems.

132. The application has been accompanied by a Flood Risk Assessment & Drainage Strategy Report, with a further Technical Note to address comments provided by the LLFA. As advised above, a proportionate surface water drainage condition will be secured.

#### **Fire Safety**

133. Policy D12b highlights that all major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor.

134. The statement should detail how the development proposal will function in terms of:

- the building's construction: methods, products and materials used, including manufacturers' details
- the means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach
- features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans
- access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these
- how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building
- ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.

135. A Fire Statement for the Plot 02 was submitted during the course of the application which sufficiently addresses the matters set out within policy D12b of London Plan. It should also be noted that the development would still be subject to building regulations where a detailed assessment of fire safety would need to be carried out.

136. With regard to Plot 01, the proposed sports pitches would be open air, while the pavilion building would be relatively small in size. The absence of a fire safety statement for this plot is therefore considered acceptable, and it is again noted that the development would still be subject to building regulations where a detailed assessment of fire safety would be carried out.

### **Employment and Training**

137. Policy BE1 sets out the requirement for an Employment, Apprenticeship and Training Plan (EATP) for all developments of 5,000sqm or more or sites capable of providing 50 or more residential units, to be prepared in partnership with Brent Works or any successor body. As the proposal does not meet this threshold, an Employment, Apprenticeship and Training Plan is not required. Nevertheless, the applicants are encouraged to employ local residents wherever possible and engage with the Council's Brent Works Team.

### **Equalities**

138. In line with the Public Sector Equality Duty, the Council must have due regard to the need to eliminate discrimination and advance equality of opportunity, as set out in section 149 of the Equality Act 2010. In making this recommendation, regard has been given to the Public Sector Equality Duty and the relevant protected characteristics (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation).

### **Conclusion**

139. The proposed use would provide a beneficial 'meanwhile' use for this site whilst the North East Lands area is redeveloped over a phased period. In land use terms this temporary use is considered to be consistent with national, regional and local policy. It would add to the commercial and leisure facilities on offer for Brent's residents and visitors and would in turn be of benefit to the local economy. The use is in keeping with the vision for how development in the Wembley regeneration area is to take place and would introduce activity and vitality that responds appropriately to the vision for the area. The pot's design would deliver an appearance appropriate for the range of uses proposed. The facilities would be accessible for all members of the local community in a location with very good public transport accessibility. The submitted scheme accords with the relevant planning policies and guidance, and it is therefore recommended that planning permission is granted, subject to conditions.

## DRAFT DECISION NOTICE



### DRAFT NOTICE

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

### DECISION NOTICE – APPROVAL

Application No: **25/3070**

To: Ms Carney  
CarneySweeney Planning  
Office 3.01, Scott House  
Suite 1, The Concourse  
Waterloo Station  
London  
SE1 7LY

I refer to your application dated **31/10/2025** proposing the following:

Temporary use of land for meanwhile land uses comprising of; an outdoor sports facility (Use Class F2) to provide 5 no. 5-a-side floodlit all weather football pitches with a single storey pavilion building and an ancillary support area; a temporary building for use as a leisure, entertainment and events venue with storage buildings and external plant equipment in an ancillary support area; boundary treatment; shared informal public realm (with new seating, lighting and CCTV) along with provision for cycle parking, accessible car parking, and an internal vehicular access route with vehicular drop off.

and accompanied by plans or documents listed here:  
Please refer to Condition 2.

**at North Eastern Lands (Plots NE04, NE05 and NE06) - Land bound by Engineers Way to the south and Fulton Road to the North and East, Wembley**

The Council of the London Borough of Brent, the Local Planning Authority, hereby **GRANT** permission for the reasons and subject to the conditions set out on the attached Schedule B.

Date: 03/02/2026

Signature:

**David Glover**  
Head of Planning and Development Services

#### Notes

1. Your attention is drawn to Schedule A of this notice which sets out the rights of applicants who are aggrieved by the decisions of the Local Planning Authority.
2. This decision does not purport to convey any approval or consent which may be required under the Building Regulations or under any enactment other than the Town and Country Planning Act 1990.

DnStdG



**SUMMARY OF REASONS FOR APPROVAL**

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

National Planning Policy Framework  
London Plan 2021  
Brent's Local Plan 2019-2041

1 This permission shall be for a limited period of three years only from the date of this consent when (unless a further application has been submitted to and approved in writing by the Local Planning Authority) the use hereby approved shall be discontinued and the buildings/fixed infrastructure shall be removed from the site and the site left in a safe and satisfactory condition in accordance with a scheme of work to be submitted to and approved in writing by the Local Planning Authority.

Reason: The land is situated within an area to be redeveloped and is acceptable on a temporary basis in the interests of the regeneration plans for Wembley.

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

- 3674-LJA-NE-00-D-A-1101 Rev.P01 Site Location Plan (1:1250)
- 3674-LJA-NE-00-D-A-1102 Rev.P01 Block Plan (1:500)
- 3674-LJA-NE-00-D-A-1103 Rev.P01 Existing Plan
- 3674-LJA-NE-00-D-A-1104 Rev.P04 Proposed Layout Plan
- 3674-LJA-NE-00-D-A-1105 Rev.P01 Proposed Elevations
- TPHS-441-DR-001 Rev A Proposed Site Access Strategy - Road Markings Details
- TPHS-441-TR-001 Rev D Proposed Servicing & Deliveries: Swept Path 12m Rigid Vehicle
- TPHS-441-TR-002 Rev D Proposed Servicing & Deliveries: Swept Path 16.5m Articulated Vehicle

Plot 01

- (03)01 Proposed Pitch Plan + Elevations

Football Pavilion Building

- FOOTBALL5S-1-100 Rev.A Proposed Plan, Front & Side Elevations + 3D View
- FOOTBALL5S-1-100 Rev.A Proposed Elevations

Plot 02

- 25-32421-01e General Arrangement (Plans & Elevations)
- 25-32421-01e Extract North

- 25-32421-01e Extract South
- 25-32421-01e Extract East & West

Supporting Documents

- Estate Operational Management Plan – North East Lands Meanwhile Use Area, dated October 2025, prepared by Quintain
- Flood Risk Assessment & Drainage Strategy Report (Version 1.0), dated 2025.10.24, prepared by Link Engineering
- Lighting Report, prepared by Polaris Light, dated 11th April 2025
- Operational Management Plan for Plot 1 (Rev.A) – NEL Meanwhile Uses, dated January 2026
- Planning Fire Safety Strategy for Plot 2, prepared by Hybred Events, dated 08 January 2026
- Technical Note [WNEL-LE-GEN-XX-RP-CE-102], prepared by Link Engineering, dated 2025.12.22
- Transport Statement [TPHS/441/TN-TS/01], prepared by Transport Planning & Highway Solutions, dated October 2025

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

3 Materials to be used in the development hereby approved shall be as follows, unless otherwise approved in writing by the Local Planning Authority:

- a) the section of replacement fencing fronting Fulton Road shall match the immediately adjacent palisade fencing in terms of its design, materials, height and colour,
- b) the pavilion building (Plot 01) and Plot 02 (Indoor immersive exhibition) shall be finished in external materials as detailed on the drawings and document.

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

4 Plot 01 of the development hereby approved, as identified on drawing ref: 3674-LJA-NE-00-D-A-1104 Rev.P04, shall not be used other than for Outdoor Sports (Use Class F2) with ancillary functions and facilities notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 (as amended) (or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification) and the Town and Country Planning (General Permitted Development) Order 2015 (as amended) (or any order revoking and re-enacting that Order with or without modification).

Reason: In the interests of proper planning and to ensure the use of the development is appropriate for the location.

5 Plot 02 of the development hereby approved, as identified on drawing ref: 3674-LJA-NE-00-D-A-1104 Rev.P04, shall not be used other than as a Leisure, Entertainment and Events Venue (Use Class Sui Generis) with ancillary functions and facilities notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 (as amended) (or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification) and the Town and Country Planning (General Permitted Development) Order 2015 (as amended) (or any order revoking and re-enacting that Order with or without modification).

Reason: In the interests of proper planning and to ensure the use of the development is

appropriate for the location.

6 The uses hereby permitted shall not operate other than in full accordance with the measures outlined within the approved Estate Operational Management Plan – North East Lands Meanwhile Use Area, October 2025, prepared by Quintain ('OMP').

No variations to the OMP shall take place without the prior written approval of the Local Planning Authority.

Reason: In the interests of public safety, amenity and pedestrian and highway safety.

7 The uses hereby permitted shall not operate other than in full accordance with the measures outlined within the approved Operational Management Plan for Plot 1 (Rev.A) – NEL Meanwhile Uses, dated January 2026 ('OMP').

No variations to the OMP shall take place without the prior written approval of the Local Planning Authority.

Reason: In the interests of public safety, amenity and pedestrian and highway safety.

8 The uses hereby permitted shall not operate other than in full accordance with the measures outlined within the approved Operational Management Plan for Plot 2 (Version 1) – NEL Meanwhile Uses, prepared by The Luna Cinema, dated October 2025 ('OMP').

No variations to the OMP shall take place without the prior written approval of the Local Planning Authority.

Reason: In the interests of public safety, amenity and pedestrian and highway safety.

9 The development hereby approved shall not be used except between the hours of:

Plot 01:

08:00 and 22:30 Monday to Sunday, including bank holidays.

Plot 02:

09:00 and 21:00 Monday to Sunday, including bank holidays.

This is except for ancillary purposes in connection with the premises such as cleaning, maintenance, administrative work and other similar activities.

Reason: To ensure an acceptable impact upon local residential amenity.

10 One of the football pitches on Plot 01 of the development hereby approved, identified on drawing ref: 3674-LJA-NE-00-D-A-1104 Rev.P04, shall be made available for subsidised use (free of charge) in accordance with the approved Operational Management Plan by charities, community groups, youth groups and schools for the lifetime of the development, unless otherwise approved in writing by the Local Planning Authority.

Reason: In the interest of the provision of facilities to meet the needs of the local community.

11 The external floodlights related to Plot 01 of the development hereby approved shall not be operated other than between the hours of 08:00 and 22:30 and shall remain switched off outside of these hours.

Reason: In the interest of the amenities of neighbouring occupiers.

12 All external lighting for the public realm areas and access road within the site, shall comply with the following maximum lux levels:

Access Road: 15 lux (pre-curfew) / 7.5 lux (post-curfew)

Public Realm: 10 lux (pre-curfew) / 5 lux (post-curfew)

The external lighting shall be erected and maintained in accordance with these details to minimise light spillage and glare outside the designated area.

Reason: In the interest of pedestrian and highway safety.

13 The development shall be carried out in accordance with the Flood Risk Assessment & Drainage Strategy Report (Version 1.0), dated 2025.10.24, prepared by Link Engineering, unless alternative details are first agreed in writing by the Local Planning Authority, through the submission of an application for approval of details reserved by condition.

Reason: To ensure that the proposed development does not adversely increase flood risk.

14 The development shall be carried out in accordance with the Lighting Report, prepared by Polaris Light, dated 11th April 2025, unless alternative details are first agreed in writing by the Local Planning Authority, through the submission of an application for approval of details reserved by condition.

Reason: To safeguard the residential amenities of the neighbouring occupiers.

15 All works in close proximity to existing and retained trees shall be undertaken in accordance with BS 5837:2012.

Reason: To safeguard the health of existing trees which represent an important external amenity feature in accordance with Policies DMP1 and BGI2 of the Brent Local Plan and G7 of the London Plan.

16 No equipment for external amplified sound (such as a public-address system) shall be installed or used on the site unless details of the system(s) and the hours of operation have been submitted to and approved in writing by the Local Planning Authority and the systems shall thereafter be installed and operated in accordance with the details so approved.

The use of equipment for internal amplified sound or music shall not take place unless it is not audible from the site boundary.

Reason: To ensure a satisfactory development that does not have an unduly detrimental impact on surrounding residents or occupiers.

17 The cycle parking spaces hereby approved shall be installed prior to the first use of the development and thereafter retained for the life of the development. The short-stay spaces shall be provided as London-style stands.

Reason: In the interest of promoting sustainable transport modes.

18 Within three months of first use or occupation, details of a proportionate surface water drainage verification for the temporary meanwhile layout shall be submitted to and approved in writing by the Local Planning Authority, in consultation with the Local Lead Flood Authority. The verification shall include:

- a) The total impermeable area associated with the temporary development;
- b) The calculated peak runoff rate from this area for the 1 in 1 year, 1 in 30 year, and 1 in 100 year plus climate change rainfall events;
- c) Confirmation of how and where runoff from the temporary development connects into the approved masterplan drainage network;
- d) Evidence that the existing receiving network has sufficient capacity to accommodate this additional runoff without increasing flood risk elsewhere; and
- e) Demonstration of how surface water will be safely managed on site during the 1 in 100 year plus climate change event, including when the wider masterplan system is

at or above capacity.

The approved details shall be implemented and retained for the lifetime of the temporary development.

Reason: To ensure that surface water runoff from the temporary development is managed safely and does not increase flood risk on or off site, in accordance with national and local flood risk and drainage policies.

19 Within three months of first use or occupation, a landscaping plan shall be submitted to and approved in writing by the Local Planning Authority, through the submission of an application for approval of details reserved by condition.

The proposed landscaping plan shall show further details for the central public realm area, including landscaping features, such as details of the raised planters, incorporating trees, shrubs, and perennial plants. Details relating to pedestrian routes through the site and wayfinding/signage shall also be indicated.

The approved landscaping works shall be implemented in full within 3 months of the date of approval (or within a timescale otherwise agreed in writing by the Local Planning Authority) and shall be retained and maintained for the duration of the three year meanwhile use. Maintenance shall include watering, weeding, litter removal, keeping plants in a healthy condition and replacing any planting that fails within this three year period with plants of a similar size and species, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure a satisfactory appearance and setting for the development, that the proposed development enhances the visual amenity of the area and that pedestrian access routes to and through the site are prioritised and fit for purpose.

20 Within three months of first use or occupation, a Delivery and Servicing Management Plan shall be submitted to and approved in writing by the Local Planning. The Delivery and Servicing Plan shall include details of how arrangements can be made for safe and efficient operations without detrimental impact on pedestrian movement, and confirmation that there would be specific areas for refuse storage on the day of collection identified, which otherwise could have an impact on amenity. The plan shall include a strategy for the management of delivery and servicing on event days at Wembley National Stadium which shall be worked on up in consultation with the stadium and shall ensure that no deliveries take place between four hours prior to the start of an event, to four hours after the end of an event.

The development shall thereafter operate in accordance with the approved delivery and servicing management plan unless an alternative arrangement is first agreed in writing by the Local Planning Authority.

Reason: To minimise negative impacts associated with servicing demand of the proposed development.

## INFORMATIVES

1 - Based on the information available, in accordance with the Environment Act 2021 and the Town and Country Planning Act 1990, this development is exempt from Biodiversity Net Gain (BNG) requirements. This exemption applies as the development falls within the specified criteria outlined in legislation and regulations. The applicants are advised to review the statutory guidance for further details on exemptions and any other environmental obligations that may apply.

2 - The applicant is advised to apply for the relevant licences via the Council's website:  
<https://www.brent.gov.uk/business/licences-and-permits>

3 - The applicants are to encourage all staff undergo the free ACT (Action Counters Terrorism) and SCaN (See, Check & Notify) counter terrorism awareness workshops by Claire Blennerhassett ([Claire.V.blennerhassett@met.police.uk](mailto:Claire.V.blennerhassett@met.police.uk))

4 - The applicant is reminded that the advertisements introduced to the site would require advertisement consent in line with the Town and Country Planning (Control of Advertisement) Regulations 2007.



Any person wishing to inspect the above papers should contact Jasmin Tailor, Planning and Regeneration, Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ, Tel. No. 020 8937 5341

## COMMITTEE REPORT

Planning Committee on

11 February, 2026

Item No

06

Case Number

25/1029

## SITE INFORMATION

RECEIVED	3 April, 2025
WARD	Dollis Hill
PLANNING AREA	Brent Connects Willesden
LOCATION	7 Randall Avenue, London, NW2 7RL
PROPOSAL	Proposed demolition of garage and x3 sheds and, erection of dwellinghouse with basement level, addition of new fence to south side of the site, provision of 2 car parking spaces, cycle and refuse storage, landscaping and associated access to land rear of 7 Randall Avenue.
PLAN NO'S	See Condition 2.
LINK TO DOCUMENTS ASSOCIATED WITH THIS PLANNING APPLICATION	<p><u><a href="#">When viewing this on an Electronic Device</a></u></p> <p><b>Please click on the link below to view <u>ALL</u> document associated to case</b></p> <p><u><a href="https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&amp;keyVal=DCAPR_172982">https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&amp;keyVal=DCAPR_172982</a></u></p> <p><u><a href="#">When viewing this as an Hard Copy</a></u></p> <p><b>Please use the following steps</b></p> <ol style="list-style-type: none"><li>1. Please go to <u><a href="https://pa.brent.gov.uk">pa.brent.gov.uk</a></u></li><li>2. Select Planning and conduct a search tying "25/1029" (i.e. Case Reference) into the search Box</li><li>3. Click on "View Documents" tab</li></ol>

## **RECOMMENDATIONS**

### Grant Consent

- A. That the Committee resolve to GRANT planning permission
  
- B. That the Head of Planning or other duly authorised persons is delegated authority to issue the planning permission and impose conditions and informatics to secure the following matters

### Conditions:

#### ***Compliance***

- Time; three-year rule
- Approved documents
- Restricted windows for privacy
- Permitted Development Rights Restrictive Condition
- Cycle and Bin Storage Facilities
- Arboricultural Method Statement and Tree Protection Plan
- Compliance with Building Regulations M4(2) 'accessible and adaptable homes' standards
- Reduced water use condition
- Parking spaces to be laid out
- Access and turning spaces to remain clear

#### ***Submission and Compliance***

##### ***Pre-commencement***

- Construction Management Plan
- Construction Logistics Plan (CLP)

##### **During Construction (prior to development above ground)**

- Landscaping Scheme (including boundary treatments and provision of rain gardens where feasible)
- Materials

##### **Informatics**

1. CIL liability
2. Party Wall Act
3. Building near boundary
4. Biodiversity Net Gain Exempt

C. That the Head of Planning or other duly authorised persons is delegated authority to make changes to the wording of the committee's decision (such as to delete, vary or add conditions, informative's, planning obligations or reasons for the decision) prior to the decision being auctioned, provided that the Head of Planning or other duly authorised persons is satisfied that any such changes could not reasonably be regarded as deviating from the overall principle of the decision reached by the committee nor that such change(s) could reasonably have led to a different decision having been reached by the committee.

## SITE MAP



## **PROPOSAL IN DETAIL**

Proposed demolition of garage and x3 sheds and, erection of dwellinghouse with basement level, provision of 2 car parking spaces, cycle and refuse storage, landscaping and associated access to land rear of 7 Randall Avenue.

## **EXISTING**

The application site includes the curtilage of No. 7 Randall Avenue together with the grassed area to the rear of No.7 and the shared access between Nos. 7 and 9. No. 7 is a semi-detached dwelling that is believed to be in use as a small-scale HMO within Use Class C4.

The application site slopes to the south, and currently forms part of the garden to No.7 Randall Avenue.

The application site has a shared driveway with the adjacent dwelling to the north, No.9 Randall Avenue. Randall Avenue and also Dollis Hill Lane to the south are characterised by two-storey pairs of semi-detached properties. The application site is not within a designated conservation area and does not have any other statutory designation, however it borders the Homestead Park Conservation Area which is to the north east. There are no listed buildings on the site or nearby.

## **SUMMARY OF KEY ISSUES**

The key planning issues for Members to consider are set out below. Members will need to balance all of the planning issues and the objectives of relevant planning policies when making a decision on the application:

**Representations received:** Objection comments from 23 individuals (some of which has submitted multiple comments) have been received in response to this application. These comments are summarised within the Consultation section below.

**Design, character, appearance and impact to heritage assets:** The proposal would involve the construction of a two-storey detached house with the first floor set within the loft space and a basement. A contemporary approach has been taken to the design of the house, with a pitched roof which reduces the appearance of the first floor. The proposal is considered to be of a suitable scale and massing for the backland setting, whilst the design and appearance of the building is considered to be appropriate for the area. The subject site adjoins the Homestead Park Conservation Area (designated heritage asset) to its rear. The development would not result in harm to the character and appearance of the conservation nor its setting.

**Impact on neighbouring residential amenities:** It is considered that the proposed development would have an acceptable impact in terms of neighbouring residential amenities in terms of light, outlook and privacy. **Trees, Landscaping and Green Infrastructure:** The impact to trees is considered acceptable. Subject to a condition to ensure the development is undertaken in accordance with the submitted Arboricultural Method Statement and Tree Planting Plan. A condition is recommended for the submission an approval of a revised detailed landscaping/tree planting plan to secure sufficient green infrastructure and to manage surface water run-off.

**Flood Risk and Drainage:** Although the application is in Flood Zone 1 – at low risk of flooding. The submitted Basement Impact Assessment has identified that the underlying geology (clayey soil) can impede drainage. As a result a pre-commencement condition is recommended to ensure a Drainage Strategy is submitted to identify any necessary mitigation and to provide details of the mitigation to ensure such details can be mitigated to effectively manage drainage.

**Transport:** The site has a PTAL of 2 and the provision of the two proposed parking spaces would meet maximum parking standards (which would allow up to 1 space per dwelling) and provide sufficient off-street parking to mitigate the potential for over-spill parking. Electric vehicle charging points are proposed for both spaces. Cycle parking is proposed within the gardens of both the existing and proposed houses. A Construction Logistics Plan would be secured through a condition.

## RELEVANT SITE HISTORY

### Relevant Planning History

24/2462: Reserved Matters application (Appearance and Scale) in relation to Outline Planning Permission reference 22/0175 dated 28 March 2022 on matters of Layout and Access, for the demolition of existing garage and erection of a 1.5 storeys detached dwelling with associated access. Application Withdrawn.

25/0267: Reserved Matters relating to condition 3ii (Landscaping) of Outline Planning Permission reference 22/0175 dated 28 March, 2022, for Outline planning permission for demolition of existing garage and erection of a 1.5 storeys detached dwelling with associated access (matters to be determined: Layout, Access) – Application Withdrawn.

23/1875: Demolition of garage and erection of dwellinghouse with basement level, provision of 2 car parking spaces, cycle storage, landscaping and associated access to land rear of 7 Randall Avenue - Refused and Dismissed on Appeal - 07/03/2024.

22/3689: Demolition of garage and erection of dwellinghouse with basement level, provision of car parking space, cycle storage, landscaping and associated access to land rear of 7 Randall Avenue - Refused, 08/02/2023.

22/0175: Outline planning permission for demolition of existing garage and erection of a 1.5 storeys detached dwelling with associated access (matters to be determined: Layout, Access) - Granted, 28/03/2022.

## CONSULTATIONS

16 properties and Dollis Hill Residents' Association were consulted for a 21-day period commencing 15/07/2025.

Following receipt of additional/amended plans ,re-consultation letters were sent on 24th September 2025.

A total of 23 objections were received (\*noting that multiple representations were sent by some individual).

Topic Theme	Objection summarised	Officer comment
Character and appearance	Incompatible design, bulk, scale and mass with surrounding context.	See Character and Appearance/ Heritage Considerations section of the main report which discusses the design of the proposal.
	Garden development not appropriate. Impact to suburban character.	Please see ' <b>Character and Appearance /Heritage Considerations assessment</b> ' which assesses the impact of the impact to existing character.
	Over development of the site	Planning policies require proposals to optimise the capacity of a site.
	Located away from the "priority locations" for small-scale residential developments.	The Principle of Development section of this report refers to Policy BH4, noting that the site is not located in a priority location (as defined by Policy BH4) and that greater weight will be placed on the existing character of the area, access to public transport and a

		variety of social infrastructure easy accessible on foot when determining the intensity of development appropriate.
	Sets precedent for further similar development/degradation and sub-division of gardens.	Each application is assessed on its own merits.
Heritage	Harm to Setting of Homestead Park Conservation Area.	<p>See Character and Appearance/ Heritage Considerations section of the main report.</p> <p>The submitted Planning and Design and Access Statement does include a section relating to 'Local Character and Heritage'. In addition, Brent's Principal Heritage Officer was consulted and raised no concern in terms of impact to the adjacent Conservation Area.</p>
Standard of Accommodation	<p>Concerns regarding standard of accommodation, including space standards.</p> <p>Basement level unsuitable light for habitable room.</p>	<p>Please see <b>Standard of Accommodation</b> section of the main report.</p> <p>Please see <b>Standard of Accommodation</b> section of the main report.</p>
Impact to Residential Amenity	<p>Loss of light, outlook and overshadowing.</p> <p>Failure to comply with 45 degree line set out in SPD1.</p> <p>Loss of privacy including overlooking from rear patio and upper terrace.</p> <p>Noise and disruption to neighbouring outdoor spaces/gardens due to the proposal being too close to other properties and gardens.</p>	<p>See Impact to <b>Residential Amenity</b> section of the main report.</p> <p>See Impact to <b>Residential Amenity</b> section of the main report.</p> <p>See Impact to <b>Residential Amenity</b> section of the main report.</p> <p>The development is for residential use and the noise is commensurate with residential use; it would result in domestic use in this already residential context. The entertainment areas are domestic and as such the scale and use is not considered to give rise to harmful noise and disturbance.</p> <p>The impact during construction is addressed under separate cover, yet the scale of the car park would be small and domestic, it is not considered</p>

		to be excessive or result in adverse harm to neighbouring amenity.
General noise and disruption during construction works.		Some noise and disturbance are to be expected with most construction projects. Any excessive impacts would be controlled through Environmental Health legislation on a development of this scale and type.
Loss of rear garden to No. 7 Randall Avenue.		The proposal would retain a rear garden of No. 7 Randall Avenue that complies with policy BH13.
Concerns pumping Station will generate noise and interfere with privacy and private amenity space.		The pump would be an internal item and is a common addition for a basement development.
Concerns regarding multiple occupancy at No.7 and HMOs in the area. The impact of the proposed development and unsociable behaviour/noise.  Concerns regarding noise and anti-social behaviour at Randall Avenue.		While the application site includes the entire curtilage of No. 7, the proposal would involve the redevelopment of the land to the rear of this property. An investigation in 2022 found that the property was in lawful use as a small-scale HMO within Use Class C4 and the property continues to have an HMO licence. No changes are proposed to the use of No. 7.  The reasonable use of the proposed new house within a residential area would not result in excessive noise or anti-social behaviour and should any such behaviour take place, this must be dealt with outside of the planning system.
Negative impacts such as, vermin/pests, odour/litter, unhygienic environment associated with Industrial bins near property entrance.		The bin storage would be commensurate with one residential dwelling, so would not be of an industrial scale. The scale and provision of bins is not considered to result in the problems listed. There is no evidence as to why this would necessarily be the case.
Light pollution to neighbouring properties and rear gardens		A condition is recommended for the submission of details regarding external lighting in terms of balancing safe access and impact to residential amenity. Lightspill from

		windows would be of a domestic scale and is not considered adversely harmful or out of context in this residential setting.
	Concerns regarding construction impact; site access and safety as well as nuisance and vibration including due to basement excavation. States that a Construction Management Plan should be submitted up front and not via condition.	It is reasonable for a construction management plan to be agreed by condition. Often the fine details of the plan will be put together by the contractor.
Trees and Ecology	Concern regarding impact to trees and ecology.  Threat to ancient trees and wildlife (bats, birds) noted in previous refusals; risk of land slippage.  States that trees have been destroyed and that it's a prosecutable offence under Town and Country Planning Act 2015. States trees have been destroyed and will be destroyed and this impacts vistas, character, heritage and wildlife.	This is discussed in the <b>Trees/Ecology and Urban Greening Factor</b> section of the report.  An Arboricultural Method Statement and Tree Protection plan was submitted. Refer to Trees section of this report.
	No Urban Greening Factor score has been undertaken.	This is discussed in the <b>Trees/Ecology and Urban Greening Factor</b> section of the report.
	Misrepresentation of site, in terms of ecology, self-build and ownership.	See <b>Biodiversity Net Gain</b> section of this report.
Basement Impact	Concerns regarding basement/safety/excavation drainage and flooding.  Increased hardstanding raises concerns regarding flood risk and drainage.	The structural safety of the development would be assessed at the building regulations stage of the application. There is no evidence to demonstrate that the development would result in an increase floor risk.
	Concerns regarding subsidence, ground levels and land stability as well as damage to other properties. Not carried out by a suitably qualified engineer, not details of person who published it or Professional Indemnity Insurance. States Basement Impact Assessment (BIA) is inaccurate.	The structural and foundation details of the proposal would be assessed within Building Regulations.  The BIA is considered acceptable for a planning assessment.

Transport considerations	<p>Pedestrian and highway safety using the shared access</p>	<p>The access has been assessed by the Council's Transport Officers. Please see <b>Transport Considerations</b></p>
	<p>Shared access would be too narrow for emergency vehicles or bin lorries</p>	<p>The access has been assessed by the Council's Transport Officers. Please see <b>Transport Considerations</b></p>
	<p>Concerns regarding parking provision and parking arrangement for Number 7 Randall Avenue</p>	<p>The access has been assessed by the Council's Transport Officers. Please see <b>Transport Considerations</b></p>
	<p>Increased air pollution</p>	<p>The development is not of a scale that would result in any adverse air quality impacts.</p>
	<p>The proposal would also have an impact on the pollution which would have a serious effect on children and with the parking being busy it will also affect homes opposite the park. The development is in close proximity to local schools and community areas (churches, schools etc).</p>	<p>The development is not of a scale that would result in any adverse pollution impacts.</p>
	<p>Transport impact due to construction machinery/vehicles. Vehicles/machinery would struggle to use the narrow access road.</p>	<p>A condition is recommended to agree a construction logistics plan which would ensure that the construction process are arranged in an appropriate manner.</p>
Fire safety	<p>Stated building does not comply with Building Regulations.</p>	<p>The assessment of Building Regulations falls under separate legislation is separate to the planning application.</p>
	<p>States sprinkler system is insufficient to accommodate a building.</p>	<p>This item would be assessed in detail within at the Building Regulations stage.</p>
	<p>Concerns raised in regard to fire safety and health and safety.</p>	<p>The submission has demonstrated that fire safety has been taken into account</p>

	<p>Concerns raised regarding emergency service access, notes narrow access and utilities in shared access.</p> <p>Reliance on a domestic sprinkler system alone does not satisfy the safety requirements under Policy D12 of the London Plan 2021.</p>	<p>The development will require separate approval under Building Regulations. The use of sprinklers is considered to be acceptable.</p>
	<p>Sets precedent for further similar development/degradation and sub-division of gardens.</p>	<p>Each application must be assessed on its own merits and subdivision of gardens is not unacceptable in principle.</p>
Other matters	<p>Accuracy of plans regarding size of site, red line boundary and topography of site, and lack of detail.</p>	<p>The plans have been checked and are to scale and accurate.</p>
	<p>Change of use not declared.</p>	<p>This application does not involve a change of use class and the development's description is clear.</p>
	<p>Multiple applications submitted</p>	<p>Planning legislation allows the applicant to submit as many applications as they want.</p>
	<p>Permission not been given for use of shared driveway for development.</p>	<p>Permission to use land is separate to the planning process.</p>
	<p>Loss of value to neighbouring properties.</p>	<p>This is not a material planning consideration.</p>
	<p>Lack of public consultation.</p>	<p>Consultation has been undertaken in accordance with the Council's statutory requirements and with the Council's Statement of Community Involvement.</p>
	<p>Reference made to a petition on change.org. Breaches the Localism Act.</p>	<p>No petition was submitted as a representation to the application.</p>
	<p>Proposal would not address housing shortage.</p>	<p>The proposal would provide a family sized house, which would make a modest but valuable contribution to the Borough's housing targets.</p>
	<p>Increase pressure on local infrastructure.</p>	<p>A development of this scale is not likely to have any noticeable impact on the infrastructure needed in terms</p>

		of power and drainage. The development would be subject to a Community Infrastructure Levy payment to help offset any impact on infrastructure within the Borough.
	<p>Concerns regarding multiple occupancy at No.7 and proposed development and unsociable behaviour/noise.</p> <p>Concerns regarding noise and anti-social behaviour at Randall Avenue.</p>	<p>While the application site includes the entire curtilage of No. 7, the proposal would involve the redevelopment of the land to the rear of this property. An investigation in 2022 found that the property was in lawful use as a small-scale HMO within Use Class C4 and the property continues to have an HMO licence. No changes are proposed to the use of No. 7.</p> <p>The reasonable use of the proposed new house within a residential area would not result in excessive noise or anti-social behaviour and should any such behaviour take place, this must be dealt with outside of the planning system.</p>
	<p>Suggestion of collusion with Brent Council. Allegation that Brent have an interest in the application.</p>	There is no basis for this comment.

## **POLICY CONSIDERATIONS**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of planning applications should be in accordance with the development plan unless material considerations indicate otherwise.

The development plan comprises:

London Plan 2021; and

Brent Local Plan 2019-2041

Key relevant policies include:

LONDON PLAN 2021

D1 London's form, character and capacity for growth

D3 Optimising site capacity through the design-led approach

D4 Delivering good design

D12 Fire safety

H1 Increasing housing supply

H2 Small sites

HC1 Heritage conservation and growth

BRENT LOCAL PLAN 2019-2041

DMP1 Development Management General Policy

BD1 Leading the Way in Good Urban Design

BH1 Increasing Housing Supply in Brent

BH4 Small sites and small housing developments in Brent

BH13 Residential Amenity Space

BHC1 Brent's Heritage Assets

## OTHER MATERIAL CONSIDERATIONS

The following are also relevant material considerations:

National Planning Policy Framework

National Planning Practice Guidance

Homestead Park Conservation Area Character Appraisal

Supplementary Planning Guidance / Documents:

SPD1 Brent Design Guide 2018

Residential Amenity Space and Place Quality SPD (updated December 2024)

Brent Basements SPD

## DETAILED CONSIDERATIONS

### Planning Background

1. An outline planning application was consented under reference 22/0175 for demolition of existing garage and erection of a 1.5 storeys detached dwelling with associated access (matters to be determined: Layout, Access) in March 2022.
2. This outline permission had reserved matters which were appearance, landscaping and scale. The outline consent has now expired, nevertheless in terms of the policy context, there has not been a new Local Plan since the decision was issued on the outline consent. A number of supplementary guidance documents have been adopted since the issue of this decision.
3. A more recent full planning application was refused under reference 22/3689 in February 2023 for the demolition of garage and erection of dwellinghouse with basement level, provision of car parking space, cycle storage, landscaping and associated access to land rear of 7 Randall Avenue.
4. This application was refused for the following reason:

*The proposed development by reason of its scale, bulk and design would result in a visually dominant, excessive development that is incongruous to the surrounding suburban locality. This is contrary to policies DMP1 and BD1 of the Brent Local Plan.*

5. It was appealed and subsequently dismissed by the Inspector.
6. The appeal decision found the main issue to be the effect of the proposal on the character and appearance of the area.
7. The appeal decision acknowledged the outline permission that was granted under reference (22/0175) for the demolition of the garage and erection of a detached dwelling at the appeal site, with matters including appearance and scale reserved for future consideration. Noting that the principle of a dwelling at the site was not disputed. Before outlining some of the differences between dwelling approved at outline stage, including that; it would have a larger footprint and would be taller both to the ridge and eaves height.
8. It noted that even though the proposed dwelling under the appeal scheme would be in a similarly central location within the site to that as per the outline consent, that the overall scale and massing would be noticeably greater than the dwelling previously permitted, resulting in a prominent form of development in an area with an open character.
9. Both the Outline Consent (22/0175) which has now expired as well as the dismissed appeal scheme (23/1875) had a similar layout to the proposed scheme, in that access was from Randall Avenue and the siting of the buildings were broadly central within the site. Further differences are discussed in the Character and Appearance and Heritage considerations section of this report.

#### **Principle of residential intensification**

10. London Plan Policy H1 sets out new housing targets, with the target for Brent being 23,250 new homes over the ten-year plan period. Policy D3 requires all developments to make the best use of land by optimising the capacity of sites, and Policy H2 aims to increase the contribution of small sites (below 0.25ha in size) to meet London's housing needs through increased intensity of use of these sites.
11. Brent's Local Plan Policy BH1 responds to this new policy context by proposing plan-led growth concentrated in Growth Areas and site allocations, whilst Policy BH2 identifies town centres, edge of town centre sites and intensification corridors as other priority areas for new housing and Policy BH4 supports the London Plan aim of increasing housing on small sites, in areas with PTAL ratings of 3 or more including development through:
  - the infill of vacant or underused brownfield sites,
  - residential conversions, redevelopment, extensions of dwellings, or infill within the curtilage of a dwelling,
  - the redevelopment of flats, non-residential buildings and residential garages,
  - upward extensions of flats and non-residential buildings
12. The application site is within a PTAL 2 (low). The site is therefore outside of a priority location and therefore greater weight will be placed on the existing character of the area, access to public transport and a variety of social infrastructure easy accessible on foot when determining the intensity of development appropriate.
13. While the development, in providing, one dwelling is low density, the character of the area and resulting impact of the design of the proposal will be discussed further below.

#### **Standard of Accommodation**

14. Local Plan Policy DMP1 states that new development must provide high levels of internal and external amenity. The size of dwellings and rooms should be consistent with London Plan Policy D6 specifically

Table 3.1 'Minimum internal space standards for new dwellings'.

15. London Plan Policy D6 also requires at least 75% of the GIA of each flat to have an internal floor-to-ceiling height of 2.5m. This exceeds the national standard of 2.3m as higher housing and the urban heat island effect are more prevalent in London, and a higher standard is required to ensure adequate quality in terms of daylight penetration, ventilation and cooling, and sense of space.
16. The proposal would be a three bed 6 person dwelling, over three floors (inclusive of a basement level). Table 3.5 of the London Plan of the London Plan outlines minimum internal space standards for new dwelling and stipulates a minimum internal space standard of 108sqm for this size/type of dwelling. At 155.2 sqm the proposal would exceed the relevant minimum space standard.
17. The London Plan Policy D6 (Housing quality and standards) states that minimum floor to ceiling height must be 2.5m for at least 75 per cent of the Gross Internal Area of each dwelling. The submitted section demonstrated that the floor to ceiling height in the basement and ground floor measure 2.6m. The floor to ceiling height at first floor would be varied due to its location within the roofspace. The floor to ceiling area has been outlined on the revised plans and shows areas measuring at least 2m, 1.7m and 1.5m.
18. The area denoted of the loft Plan does not outline the area that is at least 2.5m in height, however the section drawing has been used in conjunction with the floor plan to assess the floor to ceiling height, layout and quality of this space. The total area measuring at least 2.5m within the loft area is at least 16sqm. Therefore, a total of 30sqm of the dwelling would have a floor to ceiling area less than 2.5m in height, whilst 125.2sqm of the 155.2 sqm would have a floor to ceiling height of at least 2.5m. As such 80% of the total floor would have a that minimum floor to ceiling height must be 2.5m and as such it would comply with the London Plan in regard to minimum floor to ceiling heights.
19. All habitable rooms located at ground and first floor levels would be served by windows with good light and outlook. The basement would experience limited outlook with a terrace and lightwell above to the home office and entertainment/games room. As these are not the primary habitable areas within the dwelling, there is less of an expectation/need for natural light and as such the restricted light and outlook to the basement level is considered acceptable.

#### External Amenity

20. London Plan Policy D6 states where there are no higher local standards, a minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings with an extra 1sqm for each additional occupant. The space must achieve a minimum depth and width of 1.5m.
21. Local Plan Policy BH13 establishes that all new dwellings are 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 50sqm per home for family housing (3 bedrooms or more) situated at ground floor level and 20 sqm for all other housing.
22. Private amenity space should be accessible to all dwellings from a main living room, ideally without level changes. It should also be planned to take maximum advantage of daylight and sunlight. Where sufficient private amenity space cannot achieve the full requirement of the policy, the remainder should be provided in the form of communal amenity space.
23. The dwelling would be set within a garden space to the rear and side. These areas would far exceed the 50sqm requirement for a family dwelling, outlined within Policy BH13 (over 80sqm of usable space), the size and shape of the space is considered to lend itself to functional and meaningful good quality amenity space for future occupants.
24. The retained garden for No.7 Randall Avenue would also exceed 50 sqm.

#### Accessible Homes

25. Policy D7 of the London Plan requires the new dwelling to meet M4(2) of the Building Regulation requirement in order to be accessible and adaptable. This element of the scheme will be secured by

condition.

#### Water Consumption

26. Policy BSUI4 of the Local Plan requires new developments to achieve the target for mains water consumption of 105L or less per person per day for internal use and 5L for external use in order to protect water supply. These measures would be secured by condition.

#### **Character and Appearance /Heritage Considerations**

27. National Planning Policy Framework (NPPF) (December 2024) paragraph 135 b) and c) outlines that planning decisions should ensure developments are visually attractive as a result of good architecture and sympathetic to local character. Paragraph 139 of Framework states 'development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes'.

28. Policies DMP1 and BD1 of the Brent Local Plan 2019-2041 and the Brent Design Guide SPD1 (2018) provide guidance on principles of good design. Policy DMP1 sets out the need for development proposals to be, amongst other things, (a) of a location, use, concentration, siting, layout, scale, type, density, materials, detailing and design that provides high levels of internal and external amenity and complements the locality; and (f) safe, secure and reduces the potential for crime. Policy BD1 highlights the need for all new development must be of the highest architectural and urban design quality. Innovative contemporary design will be supported where it respects and complements historic character but is also fit for the future. In delivering high quality design, development proposals will be expected to show how they positively address all the relevant criteria within London Plan design policies and the Brent Design Guide SPD1.

29. The subject site adjoins the Homestead Conservation Area (HCA) to its rear. Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) requires that with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

30. Paragraph 202 of the NPPF recognises that heritage assets are an irreplaceable resource and seeks to conserve them in a manner appropriate to their significance. It is appropriate to consider the desirability of new development making a positive contribution to the local character and distinctiveness [paragraph 210]. Paragraph 212 of the NPPF states that when considering the impact of development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. NPPF paragraph 215 states where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. This approach is echoed by Policy BHC1 of the Brent Local Plan 2019-2041.

31. As identified with the 'Principle of Development' section of this report, the site is not located within a priority location as defined within Policy BH4. As a result greater weight has been placed on the existing character of the area, access to public transport and a variety of social infrastructure easy accessible on foot when determining the intensity of development appropriate.

32. The application is for one house and is therefore a low density, low intensity development. The overall footprint of the building and hardstanding is considered to be appropriate for this back-land site. It is considered that the proposed development is not out of character in this residential area.

33. This application proposes a detached two- storey building with the upper floor within the roof space and a basement and two sunken terraces (lightwells). The building would have a modern design with a largely hipped roof but would also feature a partly gabled roof to part of the front and rear. The roof space would feature two dormers on the hipped part of the roof, one to the front and one to the rear, as well as one

rooflight to the front roof slope and one to the rear of roof slope. The external walls are labelled to be acrylic render finish in an off-white colour, the roof would be finished in grey slate roof tiles, whilst the dormer windows would be finished in zinc cladding.

34. A basement is proposed under the full footprint of the building but would also include sunken terraces to the part of the site and part of the rear elevation.
35. The basement lower ground terraces would feature exit ladders, with a balustrade and door visible at ground floor, in relation to both terraces.
36. The maximum roof height, at approximately 6.65m is lower than the outline scheme (7.2m) and the appeal scheme (8.29m).
37. Both the Outline Consent (22/0175) which has now expired (and never implemented) as well as the dismissed appeal scheme (23/1875) had a similar layout to the proposed scheme, in that access was from Randall Avenue and the citing of the buildings were broadly central within the site.
38. The table below provides some key comparison between the schemes in terms of bulk, mass and height.

	<b>Appeal Scheme (23/1875)</b>	<b>Outline Scheme (22/0175)</b>	<b>Current Proposal (25/1029)</b>
<b>Height</b>	Maximum of 8.29m (2 storey with accommodation in the roofspace)	Maximum of 7.2m (1.5 storey with accommodation in the roofspace)	Maximum of 6.65m (1.5 storey with accommodation in the roofspace)
<b>Ground Floor Footprint</b>	64sqm (excluding lightwell)  67sqm (inclusive of lightwell)	62.56sqm	66.4sqm (excluding lightwell)  74.9sqm (including lightwells)
<b>Width</b>	9.39m	9.2m	9.5m
<b>Depth (maximum)</b>	7.02m	6.8m	7.02m
<b>Roof Style</b>	Main roof hipped with a projecting bay and gable roof. Single storey addition proposed a largely crown roof with hipped sides.	Part hipped; part gabled.	Part hipped; part gabled.
<b>Basement</b>	Basement with lightwell.	No basement.	Basement with lower ground terrace, exit ladder. Balustrade and door at ground floor.

39. Although, it is acknowledged that the outline consent has expired and was not implemented, it is worth noting the above comparisons. Namely, that the maximum height is 0.55m lower than the outline scheme and 1.64m lower than the dismissed appeal scheme.
40. The footprint would be 3.84 sqm larger than the outline consent (excluding the footprint of the proposed lightwells, when considering the footprint including the lightwells proposed, the scheme would represent

an increase in footprint of approximately 12.34sqm. Noting that the balustrade screening for the lower ground floor terraces would be limited in height.

41. With a ridge height of 6.65m, the overall height is lower than the 7.2m set out within the indicative measurements as approved in the outline planning permission and would be approximately 1.64m lower than the height of the dismissed appeal scheme.
42. It is noted that properties within the adjoining HCA are predominantly 'tetri-detached' houses in groups of three, characterised by their hipped-end and pitched roofs. The closest properties to the application site are number 1, 3 and 23 do not have the 'tetri-detached' design. Other properties within site vicinity outside of the HCA boundaries are primarily two-storey semi-detached pairs with their original hipped roofs.
43. Paragraph 12 of the appeal decision notice, when referring to the appeal scheme stated that 'It would also be sensitively located and designed to avoid adverse impacts on the setting of the nearby conservation area'.
44. Generally, the overall bulk and scale of the proposal is modest and largely in-keeping with the surrounding context and would not unduly harm of integrity of the streetscene.
45. The roofscape of the proposed building would be key in how the appearance of the development might be interpreted from a distance. The side of the proposed building facing the HCA would feature a hipped roof that gives an overall appearance that integrates better when viewed from vantages within the HCA. The roof plan reflects the indicative design as set within the outline consent.
46. Although it is clear that the proposal would not be identical to the main typology within the adjacent HCA or the common two-storey, semi-detached form found elsewhere in the immediate vicinity, the overall roofscape, bulk, scale and form of the proposed building is not considered to be out-of-place to the detriment of the established character, when it would be viewed from surrounding vantage points. Furthermore, the roof forms of closest building to the application site forming its immediate context have sufficient variations for the proposed roof not to appear out of place or overly prominent. For the same reasons and given the limited views from public vantages and separation distance, the proposal would not result in harm to the setting of the HCA and the proposal would preserve the character and appearance of the HCA .
47. In summary, although the footprint would be larger than the outline consent and the dismissed appeal, the increase is not considered significant, particularly given the citing and separation to boundaries. This taken with the revised roof form (similar to the outline scheme) and the reduction in height compared to both the outline and dismissed appeal is such that the proposed development is not considered to result in adverse harm to the character and appearance of the site or surrounding area.

### **Impact to Neighbouring Amenity**

48. In terms of neighbouring amenities, SPD1 advises that new development should provide adequate privacy and amenity for new residents and protect those of existing ones. The building envelope should be set below a line of 30 degrees from the nearest rear habitable room window of adjoining existing property, measured from height of 2m above floor level. Where proposed development adjoins private amenity / garden areas then the height of new development should normally be set below a line of 45 degrees at the garden edge, measured from a height of 2m.
49. The subject site is to the rear of neighbouring residential gardens. It is necessary to consider how the bulk and scale of the proposal would have an impact on neighbouring amenity to ensure the development would not adversely impact the living conditions of adjoining occupiers due to being over-dominant or overbearing.
50. A number of sections have been provided to illustrate the relationship with adjoining properties. It is considered that there is sufficient detail within the application to enable a judgement as to whether the massing of the development would sit below the 30 and 45-degree lines of the adjoining properties.

51. SPD1 advises that development should ensure a good level of privacy inside buildings and within private outdoor space. Directly facing habitable room windows will normally require a minimum separation distance of 18m, except where the existing character of the area varies from this. A distance of 9m should be kept between gardens and habitable rooms or balconies.
52. Reduced distances between new frontages may be acceptable subject to consideration of overlooking and privacy as well as high quality design and solutions which can sometimes mitigate impacts and allow for efficient use of land.

#### *1 Homestead Park*

53. Number 1 Homestead Park is located to the east of the proposed development site. Officers have used the submitted drawings show that the proposed development would not breach a 45-degree line in relation to the garden of number 1 Homestead Park. The plans also show that the proposed development would not breach a 30-degree angle in relation to number 1 Homestead Park.
54. There are proposed side facing window at ground floor within 18m of the boundary to number 1 Homestead Park. However as this is at ground floor level, boundary treatments are sufficient to ensure that significant overlooking is unlikely and it is noted that the ground level sloped upwards towards number 1 Homestead Park, as such this is not considered to result in harmful overlooking to 1 Homestead Park. There are no side facing windows at first floor level and as such the proposal would not result in harmful overlooking to number 1 Homestead Avenue. The dormer windows within the first floor, given their oblique angle and distance to the boundary are such that they are not considered to give rise to harmful overlooking to number 1 Homestead Park or their garden.

#### *92-102 Dollis Hill Lane*

55. These properties and their gardens are located south of the application site. The proposed building envelope would not breach the 45 degree line prescribed within SPD 1 in relation to numbers 92-102 Dollis Hill Lane. Sections have been provided through Nos. 98 and 100. In relation to No. 98, this section shows that the development will be considerably below the 45 degree line. The garden of No. 100 is considerably closer to the proposed dwelling than that of the other Dollis Hill Lane houses. The sections show that the dormer (being the highest point that is close to the boundary with No. 100) is 4.9 m from the boundary and is a maximum of 6.05 m above ground level at the boundary, and therefore is 0.85 m below the 45 degree line from the garden of No. 100. The submission demonstrates that the proposed dwelling will accord with the 45 degree line as set out in SPD1 in relation to the gardens of these.
56. The proposed building envelope would not breach the 30 degree line in relation to any of these properties.
57. The rear windows of number's 92-102 are over 18m from the rear elevation to the proposed house and thereby comply with SPD 1 in this regard.
58. The rear boundary of number 100 Dollis Hill Lane's garden is within 9m and as such it is considered necessary to recommend a condition to restrict the rear facing dormer window at first floor to protect the privacy of number 100 Dollis Hill Lane, to be non-opening and obscure glazed below a height of 1.7m (measured from the room the dormer window serves).
59. There are windows and a patio/garden area within 9m of some of the southern boundary, the boundary treatment is shown on the sections at 2m in height. A new fence is proposed along the southern boundary, it would measure 2m in height.
60. The proposed rear patio would have a raised platform, approximately 30cm higher than the nearest land level shown to the rear (as measured from Section 2). The southern boundary of the site is staggered, resulting in a varied distance from the proposed development to each part of the boundary, for example the proposed raised patio at the narrowest part would be approximately 1.7m from the southern boundary serving number 100 Dollis Hill Lane. Owing to the setback boundary, the distance would then increase to approximately 6m to the boundary with number 98 Dollis Hill Lane. The distance would then increase

marginally to the southern boundary (serving 92-96 Dollis Hill Lane).

61. The boundary treatment, together with the distance to boundaries and land levels are such that the proposed raised terrace and windows are not considered to give rise to harmful overlooking to the rear gardens and habitable room windows of properties along Dollis Hill Lane.
62. Notwithstanding that the topography slopes upwards from the rear gardens/properties on Dollis Hill Lane, it is not considered that the proposed development, including the garden, windows and raised patio area would result in harmful overlooking to the properties and gardens at Dollis Hill Lane.

#### *5-7 Randall Avenue*

63. The garden associated with number 7 Randall Avenue would be reduced, however the remaining garden would exceed 50qm which would comply with the size prescribed for family sized dwellings within Policy BH13 in the Brent Local Plan 2019-2041.
64. These are a pair of two-storey, semi-detached properties located west of the development. The proposed building envelope would not breach the 30- or 45-degree angles prescribed in SPD 1. No windows are proposed to the side elevation at upper floor level and as a result the proposed development is not considered to result in adverse harm to the light, outlook or create sense of enclosure or overlooking to occupiers at number 5 or 7 Randall Avenue. A ground floor level window is proposed to the side elevation approximately 5.8m to the boundary, however given the height of the boundary treatment, this is not considered to result in overlooking to numbers 5-7 Randall Avenue.

#### *Number 9 Randall Avenue*

65. Number 9 Randall Avenue is located north of the proposed development; the rear garden associated with 9 Randall Avenue is located directly north of the proposed dwelling.
66. Officers have used the submitted drawings and have calculated that the proposed development would not breach a 45-degree line in relation to the garden of number 9 Randall Avenue. Given the relationship of the development to the residential property at number 9 Randall Avenue, the 30-degree line would not be applicable as the development does not face onto any rear habitable room windows within No. 9 Randall Avenue.
67. In terms of privacy, a 9m gap is maintained between windows at the boundary with number 9 Randall Avenue's Garden. The windows within number 9 Randall Avenue are located at an oblique angle to the windows proposed within the development and are in excess of the 18m distance prescribed within SPD 1.
68. In summary, the proposal would generally conform with the guidance in SPD1 and is considered to have an acceptable impact to neighbouring amenity.

#### *Construction Impacts*

69. Given the proximity of the site's access to neighbouring dwellings a condition is recommended for a Construction Method Statement to be submitted to and agreed by the Local Planning Authority outlining measures that will be taken to control dust, noise and other environmental impacts of the development. This condition would be a pre-commencement condition to ensure that the ground works are managed appropriately.
70. The basement development has the potential to give rise to nuisance during construction. The applicant has submitted a Basement Impact Assessment which sets out a proposed construction methodology however the document does outline that there are no significant trees within close proximity of the building footprint which is incorrect. Nevertheless, the report provides information on the topographical flood risk and geographical nature of the site. Environment Health Colleagues have advised the submission of a Construction Method Statement which is considered appropriate given the access to the site and proximity to residential properties.

## Flood Risk and Drainage

71. Policy BSUI4 Sets out the need for proposals for minor developments, householder development, and conversions should make use of sustainable drainage measures wherever feasible and must ensure separation of surface and foul water systems. The proposal includes the provision of additional hardstanding for the parking and turning area. This is proposed to be permeable paving which will limit run-off from the site. The patio is not proposed to be permeable, but is surrounded by soft landscaping (grass).
72. The site is not in a Critical Drainage Area and is in Zone 1 for Flood Risk. As such, there is a low risk of flooding including surface water flooding. Whilst the site is susceptible to being at low risk of groundwater flooding, the Basement Impact Assessment sets out that the basement floor slab would use waterproof concrete with an internal Delta membrane, designed so that any ground water that seeps into the building will return back as ground water via a pumping station. Such matters would be dealt with under building regulations.

## Green Infrastructure

### Trees

73. Policy DMP1(h) highlights the need for development proposals to retain existing blue and green infrastructure including water ways, open space, high amenity trees and landscape features and providing appropriate additions or enhancements where possible.
74. Policy BGI2 states that development with either existing trees on site or adjoining it that could affect trees will require:
  - Submission of a BS5837 or equivalent tree survey detailing all tree(s) that are on, or adjoining the development site;
  - In the case of minor development which results in the loss of trees provision of appropriate replacements on site;
75. An Arboricultural Method Statement and Tree Protection Plan was submitted with this application. Brent's Principal Tree Officer was consulted on the application and their comments form this section of the report.
76. The site is not covered by a Tree Preservation Order, however there are trees which are protected by the Homestead Park Conservation Area designation to the north-east of the site.
77. Parking is proposed with two parking bays shown within RPA of G3 Leylandii and T4 category B Eucalyptus: This is proposed to be of no-dig construction method and so is likely to have limited impact on the trees as outlined.
78. Hard surfacing within RPA of G5 and T6 Apples. Again, proposed as no dig and fully permeable. These trees are of much less public amenity than the other trees to the northeast of the site.
79. The access drive is within RPA of T1 category B Norway Maple. There is already an access drive here and so it is considered that this will not have an adversely increased detrimental impact than the existing.
80. Landscaping proposals including the planting of eight Acer palmatum 'Aureum' trees, these are a relatively small tree and the Tree Officer has advised a condition to be recommended to include a revised tree planting strategy, which should include a greater variety of trees species to be planted to ensure both visual interest and a more resilient scheme particularly in respect of climate change.
81. Representations have been received relating to the felling of trees on site. It appears that this may have been done prior to the submission of this application, as the site is not located within a Conservation Area, these trees are not expressly protected.
82. In summary, the impact to trees would be acceptable, subject to a condition ensuring that the development be undertaken in accordance with the submitted Arboricultural Method Statement and tree

Protection Plan.

### **Ecology and Urban Greening Factor**

83. London Plan policy G6 highlights the need for Sites of Importance for Nature Conservation (SINCs) to be protected.
84. Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:
  - 1) avoid damaging the significant ecological features of the site
  - 2) minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
  - 3) deliver off-site compensation of better biodiversity value.
85. Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain.
86. Policy BGI1 (d) sets out the need for all developments to achieve a net gain in biodiversity and avoid any detrimental impact on the biodiversity of an area.
87. Policy BH4 sets out the need for all minor residential developments (less than 10 dwellings) are required to deliver an Urban Greening Factor of 0.4 on site.
88. In terms of greening and ecology, the UGF score has not been calculated, and no information has been provided regarding ecology on site. It is noted that the site is not within or adjacent to a Site of Importance for Nature Conservation Statement. An objection has been received regarding bats and nesting birds in this area. It is understood that tree removal has taken place outside of the current application, however the site with retained conifers and shrubs to be removed do not show a likelihood of supporting protected species. Although there was not any evidence providing of nesting birds in trees close to the proposal, a bird box on the garage appears to be used and would be subject to legislation that protects any nesting birds, if the development were to take place and demolition carried out nearby.
89. Overall, the plot has potential for a new landscaping and sufficient planting to create an appropriate setting for the proposed dwelling and add ensure a sufficient level of greening to the plot. Therefore, whilst an Urban Greening Score was not submitted, given the nature of the site and the proposal sufficient information has been submitted for the Local Authority to secure an appropriate level of greening on site via a landscaping condition. A landscape plan is recommended by condition which would ensure the soft landscaping of the site.

### **Biodiversity Net Gain**

90. Biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990.
91. This sets out the need (subject to some exceptions) that every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met ("the biodiversity gain condition"). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits.
92. The applicant has confirmed that the development would be exempt from the Mandatory Biodiversity Net Gain on the basis that the development would fall under 'Self-build and custom build applications'. The guidance states that all of the following conditions to qualify for an exemption as a self-build or custom build.

*'The development must:*

93. consist of no more than 9 dwellings

94. be on a site that has an area no larger than 0.5 hectares

- consist exclusively of dwellings that are self-build or custom housebuilding as defined in section 1(A1) of the Self-build and Custom Housebuilding Act 2015'
- Representations were received that raised that questioned if the development was eligible to be considered a self-build, the applicant was noted as a company rather than an individual on the application form. The Local Planning Authority sought further clarification from the agent in relation to Self-Build Exemption. The applicant provided a Biodiversity Net Gain and Self & Custom Build Statement.
- It included the following Statement in reference to the applicant:

*'Although the applicant is 'Psart Limited', a private property investment company, the dwelling is being constructed solely for the personal occupation of the company's owner, who has commissioned, directed, and meaningfully engaged in the design and construction process. For the purposes of the legislation, the relevant test concerns the nature of the dwelling and the identity/intentions of the individual(s) for whom it is being built, rather than the corporate form through which the application is submitted.'*

95. Based on the information available, in accordance with the Environment Act 2021 and the Town and Country Planning Act 1990, this development is exempt from Biodiversity Net Gain (BNG) requirements. This exemption applies as the development falls within the specified criteria outlined in legislation and regulations. The applicants are advised to review the statutory guidance for further details on exemptions and any other environmental obligations that may apply.

96. Notwithstanding this planning application Mandatory Net Gain is a legal requirement under the Environment Act. Should the development not become Self-Build as outlined then the development would be in breach of the Environment Act 2021.

97. Whilst the development may be exempt from the Mandatory Biodiversity Net Gain. Brent's Policy BGI1 (d) sets out the need for all developments to achieve a net gain in biodiversity and avoid any detrimental impact on the geodiversity of an area. The proposal includes tree planting and other landscaping. As outlined above, a revised landscape plan/tree planting strategy condition is recommended, and it is considered that the tree/shrub planting proposed is sufficient to secure appropriate BNG.

## Transport Considerations

### *Parking and Access*

98. No.7 is a semi-detached house that is believed to be in use as a small-scale HMO within Use Class C4. It has a detached garage on its north side set 25m from the highway and accessed via a 2.8m wide crossover and a shared drive with No.9. Randall Avenue is a local residential access road were on street parking is unrestricted and a parking survey from 2013 confirmed that Randall Avenue is heavily parked at night.

99. No.7 is a semi-detached house that is believed to be in use as a small-scale HMO within Use Class C4. It has a detached garage on its north side set 25m from the highway and accessed via a 2.8m wide crossover and a shared drive with No.9. Randall Avenue is a local residential access road were on street parking is unrestricted and a parking survey from 2013 confirmed that Randall Avenue is heavily parked at night.

100. Two off-street parking spaces are proposed access via the shared access, following the demolition of the existing garage. This accords with the parking provision that was approved for the previous outline planning permission. The proposal would meet the maximum parking standards should No. 7 be in use as a dwellinghouse and would slightly exceed the parking standards should No. 7 remain in use as a small-scale HMO. However, the exceedance for the HMO use is small and unlikely to impact the surrounding road network or materially discourage non-car modes of transport. It is recommended that a condition is attached to ensure that one space is provided for each dwelling (existing and proposed).

101. Both parking spaces are proposed to be provided with electric vehicle charging points, which is recommended to be secured through condition.
102. Cars using these spaces should be able to leave the site in forward gear and a paved area has been indicated for turning of cars to this end. A condition is also recommended requiring the turning area to be kept clear to enable this.

#### *Cycle and Refuse Storage*

103. Drawing number 101 proposes a bin store for the new dwelling, which will be set into the rear garden of no. 7. The location of the new bin store will be just within the 20m wheeling distance to the public highway, in compliance with Waste and Recycling Guidance. Bin storage for the existing dwelling will be provided within the front garden of no. 7. This is acceptable.
104. Drawing number 101 proposes cycle parking within the private garden of both the new dwelling and existing dwelling, which is compliant with the London Plan and welcomed.

#### *Lighting:*

105. Brent's Transport Team referred to their previous comments that had advised that safe pedestrian access from the highway to the new dwelling must be provided for security and noted that the proposed site plan (drawing number 100) does show eight wall-mounted lights positioned along the access road, which are welcomed.
106. The proposal will result in the provision of a new basement and therefore transportation would seek a Construction Logistics Plan (CLP) to ensure the proposal does not impact the highway during construction. The basement impact document does state that grab lorries and works will be kept within the site, but a CLP should be submitted to ensure that debris is not carried out onto the Public Highway and that damage and obstruction to the highway do not occur.

#### **Fire Safety**

107. Criterion A of Policy D12 of London Plan sets out that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they:

- 1) *identify suitably positioned unobstructed outside space:*
    - a) *for fire appliances to be positioned on*
    - b) *appropriate for use as an evacuation assembly point*
  - 2) *are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures*
  - 3) *are constructed in an appropriate way to minimise the risk of fire spread*
  - 4) *provide suitable and convenient means of escape, and associated evacuation strategy for all building users*
  - 5) *develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in*
  - 6) *provide suitable access and equipment for firefighting which is appropriate for the size and use of the development*

108. The building would be located outside of the 45m hose distance from Randall Avenue and would require the use of a sprinkler system within the building. The drawings and the fire statement confirm the use of sprinklers. Notwithstanding the submitted Fire Statement, there is a legal requirement to ensure the proposal would comply with Building Regulations and other building safety legislations that sit outside

of the remit of the planning permissions regime, including detailed requirements of Approved Document B (fire safety).

### **Equalities**

109. In line with the Public Sector Equality Duty, the Council must have due regard to the need to eliminate discrimination and advance equality of opportunity, as set out in section 149 of the Equality Act 2010. In making this recommendation, regard has been given to the Public Sector Equality Duty and the relevant protected characteristics (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation).

### **Conclusion**

110. The proposal is considered to accord with the development plan and adopted Supplementary Planning Documents, having regard to all material planning considerations, and the application should be approved subject to conditions.

111. Weight has been given to the planning history, including the dismissed appeal scheme as a material planning consideration.

112. It is considered that this scheme has overcome the previous reasons for the dismissed appeal. The proposal would deliver one family sized home and would contribute modestly towards Brent's housing targets.

## DRAFT DECISION NOTICE



### DRAFT NOTICE

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

### DECISION NOTICE – APPROVAL

Application No: **25/1029**

To: Mr Poptani  
Sterling Town Planning  
58 Hassop Road  
London  
NW2 6RX

I refer to your application dated **03/04/2025** proposing the following:

Proposed demolition of garage and x3 sheds and, erection of dwellinghouse with basement level, addition of new fence to south side of the site, provision of 2 car parking spaces, cycle and refuse storage, landscaping and associated access to land rear of 7 Randall Avenue.

and accompanied by plans or documents listed here:  
See Condition 2.

**at 7 Randall Avenue, London, NW2 7RL**

The Council of the London Borough of Brent, the Local Planning Authority, hereby **GRANT** permission for the reasons and subject to the conditions set out on the attached Schedule B.

Date: 03/02/2026

Signature:

**David Glover**  
Head of Planning and Development Services

#### Notes

1. Your attention is drawn to Schedule A of this notice which sets out the rights of applicants who are aggrieved by the decisions of the Local Planning Authority.
2. This decision does not purport to convey any approval or consent which may be required under the Building Regulations or under any enactment other than the Town and Country Planning Act 1990.

DnStdG

**SUMMARY OF REASONS FOR APPROVAL**

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

London Plan 2021  
Brent's Local Plan 2019-2041

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 drawings:

001 – Proposed Landscape Plan  
001 – OBU – Existing Site Plan  
140 – Existing and Proposed Long Section CC  
301 – Existing and Proposed Section 1  
302 – Existing and Proposed Section 2  
303 – Existing and Proposed Section 3  
304 – Existing and Proposed Section 4  
305 – Existing and Proposed Section 5  
100 Rev B – Proposed Site Plan  
101 Rev B – Proposed Site Plan  
110 – Proposed Ground Floor Plan  
111 – Proposed Basement Floor Plan  
112 – Proposed First Floor Plan  
113 – Proposed Roof Plan  
120 – Proposed Front Elevation  
121 – Proposed Rear Elevation  
122 – Proposed Side Elevation 1  
123 – Proposed Side Elevation 2  
130 – Proposed Section AA  
131 – Proposed Section BB  
132 – Proposed Section CC

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

3 The south-west facing window within the dormer of Bedroom 3 and the window of the first floor ensuite shall be constructed with obscure glazing and non-opening or with openings at high level only (not less than 1.7m above floor level) and shall be permanently returned and maintained in that condition thereafter unless the prior written consent of the Local Planning Authority is obtained.

Reason: In the interests of neighbouring amenity.

4 No further extensions or buildings shall be constructed within the curtilage of the dwellinghouses subject of this application, notwithstanding the provisions of Classes A, B, C, D, E & F of Part 1 Schedule 2 of the Town & Country Planning (General Permitted Development) Order 2015, as amended, (or any order revoking and re-enacting that Order with or without modification) unless a formal planning application is first submitted to and approved by the Local Planning Authority.

Reason: In view of the restricted nature and layout of the site for the proposed development, no further enlargement or increase in living accommodation beyond the limits set by this consent should be allowed without the matter being first considered by the Local Planning Authority.

- 5 The approved cycle store and bin store facilities shall be installed and made available for use prior to first occupation of the development hereby approved and thereafter retained, kept free from obstruction and maintained for the life of the development and not used other than for purposes.

Reason: To ensure the suitable provision for cycle parking provision and refuse facilities.

- 6 The works shall be carried out in full accordance with the recommendations/mitigation set out within the approved Arboricultural Method Statement and Tree Protection Plan (Tree Protection Plan July 2024 Arboricultural Method Statement prepared by GHA trees arboricultural consultancy dated 24th July 2024) unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interest of tree protection.

- 7 The dwellinghouse hereby approved shall be designed to comply with Building Regulations M4(2) 'accessible and adaptable homes' standards.

Reason: To ensure the provision of accessible homes, in accordance with policy D7 of London Plan 2021.

- 8 The building shall be designed so that mains water consumption does not exceed a target of 105 litres or less per person per day, using a fittings-based approach to determine the water consumption of the development in accordance with requirement G2 of Schedule 1 to the Building Regulations 2010.

Reason: In order to ensure a sustainable development by minimising water consumption.

- 9 The parking spaces hereby approved shall be allocated such that one parking space is allocated for the existing dwelling at No. 7 and the other parking space shall be allocated to the new dwelling hereby approved. The parking spaces shall be provided prior to first occupation of the new dwelling hereby approved including the provision of electric vehicle charging points for both space, and retained thereafter, and they shall not be used other than for purposes ancillary to the respective dwelling.

Reason: To ensure the adequate provision of parking, in the interest of highway flow and safety.

- 10 The access and turning areas as shown on the site plan hereby approved shall be implemented in full accordance with the approved drawings prior to first occupation of the new dwelling hereby approved and shall thereafter be kept clear and made available for access and turning.

Reason: To ensure safe access within the site and in the interest of highway flow and safety.

- 11 Prior to the commencement of the development (including demolition of the existing structures and ground works) a Construction Method Statement shall be submitted to and agreed by the Local Planning Authority outlining measures that will be taken to control dust, noise and other environmental impacts of the development.

Reason: To safeguard the amenity of the neighbours by minimising impacts of the development that would otherwise give rise to nuisance.

Reason for pre-commencement condition: The condition relates to details of construction, which need to be known before commencement of that construction.

12 Prior to commencement of the development hereby approved (including site clearance and demolition works), a Construction Logistics Plan (CLP) shall be submitted to and approved in writing by the Local Planning Authority. The CLP shall include, but is not limited to the following:

- i. Construction programme, forecast construction trip generation (daily) and mitigation proposed;
- ii. Site set up and access arrangements and booking systems, ensuring vehicle loading and unloading takes place clear of the highway;
- iii. Construction phasing and details of times when the use of a crane would be required;
- iv. Vehicular routes to the site;
- v. Parking of vehicles of site operatives and visitors;
- vi. Storage of plant and materials used during the construction period;
- vii. Wheel washing facilities;
- viii. Any temporary lighting;
- ix. Protection of the carriageway and any footway users at all times during construction;
- x. Erection of hoardings, security fencing and scaffolding on/over and pavements and carriageway;
- xi. Contact details of personnel responsible for the construction works

Details of measures to be used to ensure that disruption to existing nearby residents is minimised as much as possible during the construction period (including demolition) shall also be provided.

The development shall thereafter be constructed fully in accordance with the approved Construction Logistics Plan, unless otherwise agreed in writing by the local planning authority.

Reason: To ensure the development is constructed in an acceptable manner and in the interests of pedestrian and highway safety.

Reason for pre-commencement condition: The condition relates to details of construction, which need to be known before commencement of that construction.

13 Prior to development commencing above ground on the development, a detailed landscaping scheme and implementation programme shall be submitted to and approved in writing by the Local Planning Authority. The landscaping scheme shall incorporate the hard and soft landscaping details proposed on the approved plans, as well as further details of, but not limited to the following:

- (i) Details of hard surfacing, including details of permeable paving, tree pit design, underground modular systems, etc.
- (ii) Boundary treatment, means of enclosure and retaining structures
- (iii) Species, locations and densities for existing landscaping to be retained and the provision of new trees, grass and shrubs;
- (iv) Provision for rain gardens where feasible;
- (v) Details to maximise the urban green factor (UGF) for the site in line with policy BH4 of Brent's Local Plan and biodiversity net gain;
- (vi) Details of lighting for the access way

The landscaping scheme shall thereafter be carried out in full accordance with the approved details prior to first occupation of the development. It shall thereafter be maintained fully in accordance with the approved Landscape Management and Maintenance Plan, unless otherwise agreed in writing by the Local Planning Authority.

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.

There shall be no excavation or raising or lowering of levels within the prescribed root protection area of retained trees unless agreed in writing by the Local Planning Authority. Unless required by a separate landscape management condition, all soft landscaping scheme shall incorporate written five year maintenance programme following planting.

Reason: In order to introduce high quality landscaping in and around the site in the interests of the ecological value and biodiversity of the site and to ensure a satisfactory landscaping of the site in the interests of urban greening and visual amenity having regard to Local Plan Policies DMP1, BGI1 and BGI2 and London Plan policies G5, G6 and G7.

14 Details of materials for all external building work, including samples which shall be made available for viewing in an agreed location, shall be submitted to and approved in writing by the Local Planning Authority prior to any works commencing on the development (excluding demolition, site clearance and laying of foundations). The work shall be carried out in accordance with the approved details thereafter, unless otherwise agreed in writing by the local planning authority.

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

## INFORMATIVES

**1** - The applicant is advised that this development is liable to pay the Community Infrastructure Levy; a Liability Notice will be sent to all known contacts including the applicant and the agent. Before you commence any works please read the Liability Notice and comply with its contents as otherwise you may be subjected to penalty charges. Further information including eligibility for relief and links to the relevant forms and to the Government's CIL guidance, can be found on the Brent website at [www.brent.gov.uk/CIL](http://www.brent.gov.uk/CIL).

**2** - The provisions of The Party Wall etc. Act 1996 may be applicable and relates to work on an existing wall shared with another property; building on the boundary with a neighbouring property; or excavating near a neighbouring building. An explanatory booklet setting out your obligations can be obtained from the Communities and Local Government website [www.communities.gov.uk](http://www.communities.gov.uk)

**3** - The applicant must ensure, before work commences, that the treatment/finishing of flank walls can be implemented as this may involve the use of adjoining land and should also ensure that all development, including foundations and roof/guttering treatment is carried out entirely within the application property.

**4** - Based on the information available, in accordance with the Environment Act 2021 and the Town and Country Planning Act 1990, this development is exempt from Biodiversity Net Gain (BNG) requirements. This exemption applies as the development falls within the specified criteria outlined in legislation and regulations. The applicants are advised to review the statutory guidance for further details on exemptions and any other environmental obligations that may apply.

Any person wishing to inspect the above papers should contact Sarah Dilley, Planning and Regeneration, Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ, Tel. No. 020 8937 2500