

# Planning Committee

**Thursday 2 July 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:

S Butt (Chair)  
H. Patel (Vice-Chair)  
Gallagher  
Ibrahim  
Lorber  
Mahmood  
Maurice  
Thomas

### Substitute Members

Councillors:

I.Ahmed, Bajwa, Dar & Donnelly-Jackson

Councillors:

A. Patel & Chowdhury

Councillors:

Brown & Georgiou

Councillors:

Ahmadi Moghaddam & Perrin

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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 is to charitable purposes;
- whose principal purposes include the influence of public opinion or policy (including a political party or trade union).

(b) The interests a 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. <b>Apologies for Absence</b>		
2. <b>Declarations of interests</b>		
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. <b>Minutes of the previous meeting</b>		1 - 18
To approve and confirm the minutes of the previous meeting held on Wednesday 3 June 2026 as a correct record.		
<b>APPLICATIONS FOR DECISION</b>		
4. 26/0225 - Brent NHS Primary Care Trust, Wembley Centre for Health & Care, 116 Chaplin Road, Wembley, HA0 4UZ		23 - 90
5. 25/0810 - Kingsbury High School, Princes Avenue, London, NW9 9JR		91 - 124
6. 25/1022 - Thanet Lodge Garages, Mapesbury Road, London		125 - 148
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 5 August 2026**



Please remember to **SWITCH OFF** your mobile phone during the meeting.

- 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 3 June 2026 at  
6.00 pm

PRESENT: Councillor S Butt (Chair), Councillor HB Patel (Vice-Chair) and Councillors Gallagher, Ibrahim, Mahmood, Maurice Lorber and Thomas.

#### 1. Welcome and Apologies for absence

There were no apologies for absence.

#### 2. Declarations of interests

In relation to Agenda Item 4: 25/2875 - Land next to 125 Preston Road, Wembley, HA9 – it was confirmed that all members of the Committee had received an approach from both the applicant and 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.

Councillor Maurice additionally advised that he had been approached by an objector, who had been unable to submit their comments on the planning application via the online portal and therefore requested that the councillor forward the document on their behalf to the Planning officers, which he had done. Councillor Maurice confirmed that no discussion had taken place regarding the content and he therefore felt able to consider the application with an open mind 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 meeting held on Wednesday 11 February 2026 be approved as a correct record of the meeting.

#### 4. 25/2875 - Land next to 125 Preston Road, Wembley, HA9

##### PROPOSAL

Proposed construction of a dwellinghouse with landscaping works to the front and rear gardens, installation of boundary wall and bike and bin storage.

##### RECOMMENDATION

That the Committee resolve to GRANT planning permission subject to:

- (1) The conditions and informatives, as set out in the committee report.

Janesway Cheung (Career Grade Planning Officer) introduced the report, advising members that the application sought full planning permission for a two storey 3 bed, 5 person dwelling which would form a new end of terrace property adjoining with the existing pair of semi-detached dwellings at No.123 and No.125 Preston Road. The development was designed with a pitched roof, with a ridge height of c.8.15m. The proposal also included a single-storey rear extension, measuring 6.0 m in depth, with a flat roof and an eaves and maximum height of 3.0 m. Additional works comprised the creation of a front forecourt with landscaping, combined cycle and refuse storage, the erection of a brick front boundary wall, brick side boundary treatment, and timber fencing along the remaining side boundary. Private external amenity space would be provided to the rear garden for the use of residents at the property. Members also noted that the application had followed refusal of a previous application (ref: 25/1246) on design and appearance grounds that was subsequently upheld and dismissed at appeal on 19 January 2026. The key difference with this scheme was related to the amended roof form from a mono-pitch roof to pitch roof to the dwelling, the altered siting, size and design of the first-floor front facing window and first floor flank window. This was in contrast to the previous scheme, which proposed a predominantly white-coloured external finish to the dwelling, the revised proposal incorporated red brickwork, red clay roof tiles, white render, and PPC matte white aluminum framed windows and doors.

Attention was also drawn to the supplementary report circulated in advance of the meeting, which noted the receipt of one new objection and a further objection from an individual who had previously commented. Members were advised that a summary of the issues raised, together with the officers' responses, had been detailed within the supplementary report. The recommendation remained to grant planning permission, subject to the conditions and informatives set out within the main committee report.

The Chair thanked Janesway Cheung 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 Kunal Shah (who had registered to speak as an objector, online) to address the Committee in relation to the application, who highlighted the following points:

- In opening his comments Kunal Shah began by stating that the proposed development would be physically attached to his home as his property adjoined the application site.
- Attention was drawn to the Planning Inspector's appeal decision dated 19 January 2026. Kunal Shah advised that the Inspector had undertaken a site visit, assessed the proposal and reached a clear conclusion that the development would cause significant harm to the character and appearance of the area, and that the appeal had been dismissed. It was noted that the Inspector had identified three specific elements giving rise to harm, namely the attachment of the building to his property, the occupation of the roadside verge at the junction, and the combined visual effect of introducing a new building in that location. It was stated that these factors, taken together, had led the Inspector to conclude that the development would be visually uncomfortable.

- Kunal Shah further advised that, at paragraph 7 of the appeal decision, the Planning Inspector had described the site as a plot effectively formed of a roadside verge, rather than a building plot with a verge alongside it. It was emphasised that the verge itself constituted the plot and that no revisions to the roofline or choice of brick could alter the fundamental characteristic of the land.
- Attention was drawn to paragraph 16 of the committee report, where it was noted officers had acknowledged that the footprint of the dwelling remained unchanged from the scheme previously dismissed. It was stated that the same attachment to his property, the same verge, the same junction location and the same loss of openness identified by the Inspector all remained.
- Kunal Shah additionally stated that the officer's assessment relied on changes to the roof form, materials and fenestration, which he described as architectural amendments. It was felt that the Inspector's concerns had not primarily related to architectural design, noting that the Inspector had accepted that a contemporary design approach would not necessarily be inappropriate, but had nonetheless dismissed the appeal because the harm arose from where the building was placed and what it was attached to.
- Concern was also expressed that revisions to the roofline would not address the loss of the corner, that changes in materials would not remove the attachment to his property, and that design features such as shadow gaps would not restore the sense of spaciousness identified by the Inspector. It was reiterated that the characteristics giving rise to harm remained.
- Kunal Shah advised that, in his view, the key issue for the Committee was whether the specific harms identified by the Inspector had been overcome, rather than whether the revised scheme represented an improvement from the previous proposal.
- Reference was made to the supplementary report, noting that officers had expressly acknowledged that the footprint remained unchanged. It was reiterated that the attachment to his property, the occupation of the verge and the loss of spaciousness remained, and that only the appearance of the building had been amended.
- In reiterating the concerns highlighted, Kunal Shah advised that he relied on the conclusions of the Planning Inspector, who had visited the site, assessed the proposal and identified significant harm, which he considered had not been addressed. In concluding, he therefore asked that the proposed planning application be refused and requested that, should any member be minded to approve the application, they state which specific harms identified by the Inspector they considered to have been overcome and the reasons for that conclusion.

The Chair thanked Kunal Shah for addressing the Committee and then invited members to ask any questions they had in relation to the information presented. The following key points were noted:

- Members sought clarification as to whether it was important for a plot to be square or rectangular, rather than of the form presented within the proposed application. In response, Kunal Shah referred to the Planning Inspector's description of the site as a roadside verge, rather than a typical building plot and expressed the view that the plot ought to be of a regular shape and should not be attached to existing dwellings which had been established for approximately 50 to 60 years prior.

The Chair thanked Kunal Shah for responding to the Committee's questions and then moved on to consider a further request to speak which had been received from Adam Dainow (who had registered to speak as the applicant), who highlighted the following points:

- In opening his comments, Adam Dainow began by stating that Caswell and Dainow specialised in the development of underused sites to deliver high quality family housing through what he described as gentle densification, in line with national, London and local planning policy.
- It was explained that the proposal related to the provision of a single-family dwelling on a small and underutilised parcel of land to the north of 125 Preston Road. It was stated that the site was sustainably located, with strong public transport accessibility, and was consistent with the types of sites identified in the London Plan and Brent Policy BH4 for small scale housing delivery.
- It was noted that a previous application had been recommended for approval by officers and refused by the Committee solely on the grounds of design and appearance. It was highlighted that no concerns had been raised in relation to the principle of development, neighbour impacts, transport, amenity or sustainability.
- Members were advised that careful consideration had been given to the concerns raised previously and that the current proposal had been comprehensively redesigned in response. It was further stated that the previous minimalist approach had been replaced with a more contextual design reflecting the character of neighbouring Tudorbethan properties. It was additionally noted that the revised scheme incorporated massing aligned at eaves level, a roof pitch reflecting neighbouring properties, window proportions consistent with adjacent homes, and a material palette of red brick, white render and clay tiles drawn from the surrounding streetscape.
- As an additional issues, reference was made to the wider context of housing need, with it noted that the Borough continued to face significant pressure to deliver new homes, particularly larger family housing. It was also mentioned that the Council's own evidence indicated that over 53% of identified need was for family homes with three or more bedrooms, which the proposal would provide. It was added that small windfall sites made an important contribution to meeting this need and could typically be delivered within shorter timescales, as recognised by the National Planning Policy Framework (NPPF).

- The concerns raised by neighbouring residents were acknowledged with it recognised that sensitivity to change was understandable. However, it was emphasised that planning decisions should be based on compliance with planning policy. It was reiterated that the previous reason for refusal had related solely to design and appearance and that officers had concluded that this matter had now been addressed.
- In concluding his presentation to the Committee, Adam Dainow requested that the Committee therefore endorse the officer recommendation and grant planning permission.

The Chair thanked Adam Dainow 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, members questioned why the proposed three-bedroom dwelling had not been provided with at least one car parking space. In response, Adam Dainow stated that the proposal complied with relevant planning policy and noted that, as the site was classified as being in a sustainable location within walking distance of Preston Road and Wembley, there was no requirement to provide off-street car parking. It was further explained that sustainability had been prioritised within the design, noting that the frontage of approximately 73 sqm had been largely retained as soft landscaping, including grassed areas and tree planting, rather than hardstanding. It was additionally stated that this approach placed emphasis on the streetscape and aligned with the Council's transport and sustainability policies for new housing developments.
- Members sought confirmation as to whether the property would be sold, following the development of the proposed site. In response, Adam Dainow confirmed that the property would be sold on the local market, intended for occupation by local families, and described it as a well-designed triple aspect family home.
- Supplementary queries were raised regarding what would prevent a future owner from removing the grassed frontage and installing hardstanding. In response, Adam Dainow noted that the front of the property would be enclosed by a brick wall and that the proposal complied with the Council's Urban Greening Factor (UGF) policy, which required a proportion of the site to be retained for green infrastructure and sustainable drainage. It was further mentioned that any alteration by a future owner that conflicted with these requirements would be in breach of planning policy and would be subject to the Council's usual enforcement procedures.
- Members were keen to seek details as to the reasoning behind developing an unusually shaped wedge-shaped plot. In response, Adam Dainow stated that opportunities for development on regular square shaped plots were limited within London. Adam Dainow advised that his business specialised in delivering family homes on constrained and irregular sites and acknowledged that such development sites required significant investment and careful design consideration. The view was expressed that, with an appropriate design

approach, such sites could deliver high quality architecture and well-designed homes.

- Views were then sought regarding how the safety of families, particularly those with children, had been considered in the design of the proposed application. In response, Adam Dainow advised that a brick wall was proposed along the side of the property, similar to other properties on that road which was quiet, with relatively low vehicle movement. It was further highlighted that the proposal included two garden areas, which he considered beneficial for family use, particularly given that comparable developments often prioritised parking provision. It was added that, while it was not possible to control the use of outdoor spaces by children, the design had sought to provide a suitable and safe family environment.
- Members sought clarification as to whether there was an entrance and exit included at the rear of the property, with a focus on the safety of children accessing the road. In response, Adam Dainow confirmed that a secure gate was proposed for bin access. It was also noted that any access points would be lockable, consistent with typical arrangements in residential properties across London. Adam Dainow further added that, should officers consider additional security measures necessary, he would be willing to incorporate such requirements into the design.
- Further details were sought on the size and dimensions of the plot in metres or feet, rather than hectares as detailed in the committee report. In response, Adam Dainow advised that he did not have those specific measurements available. However, he stated that the proposal provided a dwelling of approximately 93 sqm, formed as a three-bedroom, five person home, in accordance with London planning standards. It was further noted that, due to the positioning of the site, the dwelling would benefit from a triple aspect layout, with windows on three elevations and roof lights serving the kitchen area, which he considered to be an advantage over typical dual aspect properties. The Chair further clarified that the width of the proposed site was 6 metres and confirmed that officers would be able to provide further detailed measurements when responding to members' questions in the subsequent part of the meeting.

The Chair thanked Adam Dainow 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:

- Clarification was sought as to the potential security measures that could be secured, either through suggestion or condition, to improve the safety of families with children, particularly in relation to access to the side road and the prevention of children entering the road. In response, Janesway Cheung (Career Grade Planning Officer) referred specifically to Condition 10, part ii, which required the submission and approval of detailed proposals for garden walls, fences and other forms of boundary treatment. It was stated that both the appearance and height of such measures would be assessed at the stage when the condition was discharged. David Glover (Head of Planning and Development Services) further

added that, in order to ensure clarity when details were submitted, Condition 10 part ii, would be amended to include explicit reference to the security of the gate.

- In querying the practicalities of enforcing biodiversity and Urban Greening Factor (UGF) requirements, particularly in circumstances where a future occupier might seek to install hardstanding in the front garden, members questioned how compliance with these requirements would be monitored and enforced. In response, Victoria McDonagh (Development Management Service Manager) advised that permitted development rights would be removed under Condition 4, which prevented a range of alterations that would otherwise be permitted, including the paving of front gardens. It was stated that any works would require planning permission. It was further noted that landscaping conditions required planting to be maintained, with any planting that failed within a period of 5 years to be replaced. It was confirmed that the removal of permitted development rights would apply in perpetuity for the lifetime of the property.
- Members then sought confirmation as to whether the removal of permitted development rights extended to loft conversions, to which Victoria McDonagh (Development Management Service Manager) confirmed that it did, advising that Classes A, B, C, D, E and F were included, which encompassed loft conversions.
- Concerns were highlighted regarding the shape of the plot, noting that it measured approximately 6 metres in width and became narrowed to around 1.5 metres at the rear. Members queried whether this would provide a suitable family home. In response, Janesway Cheung (Career Grade Planning Officer) noted that, in terms of internal space, the dwelling complied with London Plan standards, with a total floorspace of 93 sqm for a three bedroom, five person dwelling. It was further added that the proposal met the requirement for 50 sqm of external amenity space. The presence of trees planted to the rear of the site was acknowledged. It was explained that the design needed to balance the constraints of the plot with the requirements for Urban Greening Factor and biodiversity net gain. It was also stated that approximately 19 sqm of grassland would be available for use by future occupants, with additional shaded areas provided by the trees. Victoria McDonagh (Development Management Service Manager) additionally noted that all bedrooms met London Plan minimum size standards and that the dwelling provided large bifold doors, roof lights and good outlook from habitable rooms. It was further noted that the triple aspect structure and a minimum floor to ceiling height of 2.5 metres across at least 75% of the floorspace would contribute to a sense of space, ventilation and overall quality.
- In referring to the Planning Inspector's report, members sought clarification on the meaning of the terms 'character' and 'appearance', noting that they had visited the site and expressed the view that the proposal would result in a substantial change to the character of the area and that the introduction of the proposed dwelling would result in the loss of an open outlook. In response, John Stiles (Placemaking Manager) explained that the terms character and appearance were commonly used in urban design and that 'appearance' related to visual aesthetics, whereas 'character' encompassed a broader range of factors, including scale, built form, landscape and the width of the streets. It was further stated that the prevailing character of Preston Ward was generally

metroland in origin, although this specific area of Preston Road exhibited a more mixed character, with buildings dating from the 1960s, 1970s, late 1990s and 2000s. It was considered that there was no single definitive character for the specific area. David Glover (Head of Planning and Development Services) further added that the Planning Inspector had considered all aspects of the previous scheme, including siting, location and design, and had weighed these against the benefits of the proposal. It was noted that while the footprint remained unchanged, the design and appearance had been revised. It was further noted that members were required to assess the current proposal in its entirety, considering its relationship to the character of the area and balancing this against the benefits of the scheme. It was additionally mentioned that policy recognised the need for change in order to meet housing requirements and that the key consideration was whether such change was acceptable in this instance. John Stiles (Placemaking Manager) further advised that the character of an area was not fixed but evolved over time, which should be taken into account.

- Further information was sought on whether the existing dwelling at No. 125 Preston Road had side windows facing the grass verge. In response, Janesway Cheung (Career Grade Planning Officer) presented the site plan and advised that there was one ground floor flank window, which had a fence built against it, and a further first floor flank window within a rear extension. It was stated that the rear building line of the new dwelling would be in line with the first floor of the existing house next door, resulting in no loss of outlook. It was also noted that the ground floor window was obscure glazed and likely served a non-habitable room, such as a toilet, and concluded that there would be no undue detrimental impact.
- Members sought further clarification on whether any trees would be removed to accommodate the development, to which Janesway Cheung (Career Grade Planning Officer) confirmed that no trees would be removed, advising that the site currently consisted of ornamental shrubs and grassland.
- Members commented that the proposal would detract from the character of the area, noting that most of the houses on Preston Road were 1920s and 1930s metroland housing and expressed concern that the development would not be in keeping with the original dwelling. As an additional issue, members questioned whether the proposal contributed positively to the architectural character of Preston Road. In response, John Stiles (Placemaking Manager) stated that the design drew cues from neighbouring properties and reinterpreted them in a contemporary manner and considered this approach to be more architecturally appropriate than direct replication. It was also suggested that the site should be considered as a corner plot. Victoria McDonagh also reiterated the importance of small sites in contributing towards the Borough's housing target of over 2300 homes per annum. It was noted that the proposed design had sought to respond to the Planning Inspector's previous concerns through the use of more contextual materials, including a pitched roof, red clay roof tiles and red brickwork.
- Further concern was expressed regarding the apparent scale of the building, given its width of only 6 metres. In response, Victoria McDonagh (Development Management Service Manager) explained that a typical residential frontage was

approximately 6 metres and that extensions to a house were often between 3 metres and 3.5 metres in width. David Glover (Head of Planning and Development Services) further added that some photographs could influence perception, with elements appearing wider when viewed from closer proximity and narrower when viewed from a greater distance. He also explained that narrower properties were not uncommon, citing examples as small as 4 metres in width. The need to deliver a range of housing types and sizes, particularly given the shortfall in housing delivery was emphasised. It was additionally stated that the quality of the proposed dwelling met all relevant standards.

- Details were sought on what was the minimum requirement for external amenity space, to which Janesway Cheung (Career Grade Planning Officer) advised that the requirement was 50 sqm and confirmed that the proposal met this standard. It was additionally stated that 37.78 sqm would be planted with new trees, and the area between the patio and tree planting would be 19.22 sqm.
- Clarification was sought on the measurements of the overall site area, to which Victoria McDonagh (Development Management Service Manager) advised that the total site area was approximately 220 sqm.
- Further questions were raised on whether all rooms would benefit from natural light and ventilation. In response, Victoria McDonagh (Development Management Service Manager) presented information taken from the drawing pack to illustrate the proposed ground floor plans and confirmed that the habitable rooms would receive adequate daylight and outlook, The internal layout was also described, which included a ground floor bedroom, open plan kitchen and dining area with bi fold doors, and roof lighting. It was further stated that the first floor bedrooms met London Plan Space Standards and received adequate daylight and outlook to each of the rooms.
- The Chair sought clarification on whether the dwelling was dual or triple aspect, to which Victoria McDonagh (Development Management Service Manager) clarified that the dwelling would be triple aspect overall, providing adequate outlook, daylight and ventilation.
- As a final query, the Chair questioned whether future occupants would be eligible to apply for a Controlled Parking Zone (CPZ) or Wembley Event Day permits. In response, Victoria McDonagh (Development Management Service Manager) noted that the proposal did not include off-street parking. Residents could apply for a parking permit in the Wembley Event Day Zone. It was also clarified that the scheme was classified as car free.

## DECISION

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

- (1) The conditions and informatives, as set out in the committee report, together with the following amendment to Condition 10ii:

- That the details of garden wall, fences or other form of boundary treatment be provided within the site (including details of external materials and heights), and security measures relating to any gates to the rear garden).

(Voting on the above decision was as follows: 5 in favour of granting planning permission, and 3 in favour of refusal).

At the conclusion of the previous item, the Chair agreed to adjourn the meeting for a period of 15 minutes to allow for a short break prior to the consideration of the next item. The meeting reconvened at 7:15pm.

## **5. 25/2230 - Garages rear of 60 Olive Road, London, NW2**

### PROPOSAL

Demolition of existing garages and proposed erection of a two-storey building with basement level to provide 2 residential dwellings with front lightwells, associated private amenity space, boundary treatment, cycle and refuse storage.

### RECOMMENDATION

That the Committee resolve to GRANT planning permission subject to:

- (1) The conditions and informatives, as detailed in main and updated within the supplementary committee report.

Mahya Fatemi (Career Grade Planning Officer) introduced the report, advising members that the application sought full planning permission for the demolition of existing garages and proposed erection of two storey building with basement level to provide 2 homes, each with two bedrooms, with front lightwells, associated private amenity space, boundary treatment, cycle and refuse storage. Attention was also drawn to the supplementary report circulated in advance of the meeting, which noted the revised plans received in response to updated information relating to the recently constructed outbuilding at No. 64 Olive Road. It was also noted that the submitted existing and proposed drawings had been amended to accurately reflect this development. Moreover, as part of Part A of Condition 11 (wildlife and nesting features), members heard that the wording of the condition had been updated to provide more site-specific requirements, in line with the Council's Ecology Officer's advice. The recommendation remained to grant planning permission subject to the conditions and informatives as set out within the main and updated within the supplementary committee report.

The Chair thanked Mahya Fatemi 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 Adrian Boylan (who had registered to speak as an objector) to address the Committee in relation to the application, who highlighted the following points:

- Adrian Boylan began by noting that his property overlooked the application site and stated that he had not been included in the list of consultees when the

proposals were initially announced. He confirmed that he had become aware of the application through word of mouth.

- It was noted that 16 objections to the proposal had been received, including objections submitted by both local ward councillors.
- Members were advised that the proposal involved the replacement of four structures described as garages but contended that these were not used as garages and were instead utilised for commercial storage purposes by the owners.
- Adrian Boylan expressed the view that development within rear garden land should generally be discouraged. He clarified that his objection was not to the principle of development on the site, provided that the existing green space was preserved, but rather to the form and design of the proposed development. It was considered that the introduction of new buildings within a street characterised by 1920s semi-detached properties would be out of keeping with the established appearance of the area.
- As further observations it was highlighted that properties on Wren Avenue typically featured open front gardens, whereas the proposal included a front wall of approximately head height. It was additionally noted that the properties within Wren Avenue did not include basements, whereas the application proposed the introduction of basements as part of the development. The view was expressed that the inclusion of basements was intended to maximise income for the owner and stated that, notwithstanding this addition, each dwelling would still only provide two bedrooms.
- A further concern was raised that a significant proportion of the existing green space to the rear of the current garages would be lost as a result of the construction of what he described as small and visually unattractive dwellings.
- In concluding his presentation to the Committee, Adrian Boylan stated that the proposed development would also result in increased overshadowing of neighbouring gardens and would lead to a reduction in privacy for adjacent flats.

The Chair thanked Adrian Boylan 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:

- Views were sought from the objector as to how the plot might be used as an alternative to the proposed development. In response, Adrian Boylan stated that, in his view, the site would have been more appropriately developed in a manner that reflected and maintained the established character of the surrounding area. It was expected that any development would seek to preserve the open front garden aspect characteristic of other properties along the road, and to be in keeping with the existing architectural style and appearance. It was acknowledged that it would not be possible to replicate the exact design of buildings from the 1920s within a modern development however, it was felt that it would be feasible to avoid introducing a structure that appeared out of keeping

within the local context. The view was expressed that the current proposal resembled a brick structure that had been imposed between a Victorian street and an Edwardian street, without sufficient regard for the surrounding environment. By way of comparison, Adrian Boylan referred to other developments within the local area, including those at the Waterworks site near the end of Olive Road and around the corner in Sneyd Road. It was noted that approximately 15 years previously, an empty plot in that location had been developed with a pair of semi-detached houses. The development was described as modern in design but broadly complementary to the style of the surrounding Edwardian housing. Concern was expressed that the current proposal made no meaningful attempt to integrate with the existing environment. It was suggested that the design appeared to prioritise maximising the use of available space, potentially at the expense of acceptable living conditions for future occupants. It was further stated that the proposed development would not provide suitable family housing and indicated that the properties would instead be purchased and used as bedsits, which he described as a typical outcome for developments of this nature within the area. Further concerns were raised regarding the potential for basement accommodation with limited natural light and restricted outward views, given the presence of surrounding high walls, as well as the absence of effective garden space. Adrian Boylan concluded that, in its current form, the proposed development would not provide a desirable living environment and would not be a place that individuals would wish to live.

As there were no further questions raised at this point, the Chair thanked Adrian Boylan 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 referring to paragraphs 62 and 64 of the committee report, members sought clarification on the constrained nature of the site in relation to the Urban Greening Factor and queried what factors had contributed to the site being considered constrained. In response, Victoria McDonagh (Development Management Service Manager) noted that the scheme achieved an Urban Greening Factor score of 0.22. It was explained that this had been achieved through measures including the provision of green roofs, planting and permeable paving. Members were advised that the site was currently predominantly hard surfaced, with only limited areas of ivy and general shrubbery that had developed over time due to lack of maintenance. It was additionally stated that the development would deliver some improvements in urban greening. However, it was explained that the site was constrained by its limited width and depth, particularly given that it accommodated two dwellings without the benefit of a substantial garden area. As a result, opportunities for more significant landscaping interventions such as large communal gardens or extensive tree planting were limited. It was emphasised that while the scheme included enhancements, there was limited opportunity in being able to provide substantial landscaping which would contribute towards urban greening. It was further added that the scheme would nonetheless deliver two dwellings, each comprising two bedrooms, and would contribute to meeting the demand for smaller homes within the borough.

In considering the response provided, members stressed the importance of considering whether environmental policies such as the Urban Greening Factor were being treated as optional where sites were developed more intensively. Members highlighted the Council's declaration of a climate emergency and expressed concern that high density development on small sites could undermine environmental objectives if policy standards were not fully met. In addressing the concerns raised, Victoria McDonagh (Development Management Service Manager) stated that the delivery of housing targets relied on a combination of site types, including both large allocations and smaller sites. It was explained that larger sites, such as those previously occupied by large retail premises, offered greater opportunities for significant landscaping, communal amenity spaces and tree planting, which could more easily achieve higher Urban Greening Factor scores. It was further mentioned that smaller sites also played an important role in delivering housing targets, particularly in providing a mix of housing types including one and two bedroom properties. Reference was made to both local policy and the London Plan, which supported the optimisation of site capacity on smaller plots. It was acknowledged that smaller developments might not meet all policy targets in full, including the 0.4 Urban Greening Factor target. However, it was confirmed that officers considered the provision within this scheme to represent the maximum achievable level, alongside ecological enhancements designed to improve biodiversity. It was emphasised that the proposal involved a balance between policy compliance and delivery of housing. Damian Manhertz (Development Management Area Manager) further added that, on larger sites, there was more capacity to incorporate significant landscaping and greening features and explained that some sites could more easily achieve a score of 0.4 where large areas of existing green space were retained, whereas this site had limited such opportunities.

- Members raised supplementary points of concern regarding the cumulative impact of developments that did not meet the 0.4 target. Reference was made to recent extreme weather conditions, including an extreme heatwave in May 2026, and emphasised the importance of achieving climate objectives. The role of tree canopy, green roofs and permeable surfaces in mitigating heat, managing surface water and improving flood resilience was highlighted. It was felt that allowing repeated shortfalls on smaller sites could undermine broader environmental outcomes across the borough. Whilst recognising the issues highlighted, Damian Manhertz (Development Management Area Manager) stated that it was important to consider performance across the borough as a whole and advised that while some schemes fell below the 0.4 target, others exceeded it, and that overall performance needed to be considered. He agreed that efforts should continue to achieve policy targets wherever possible.

Victoria McDonagh (Development Management Service Manager) further added that the proposed development would deliver improvements in flood management when compared to the existing condition of the site. It was explained that the introduction of permeable paving and green roofs would help to manage surface water runoff and reduce pressure on drainage systems.

- Members questioned whether a visual Computer-Generated Imagery (CGI) representation of the proposed development from the front could be provided in

order to better understand its appearance within the surrounding context. In response, Mahya Fatemi (Career Grade Planning Officer) advised that CGI did not demonstrate the full materiality and detailing of the scheme. It was noted that conditions had been attached to the application to secure the quality of materials and construction details, including windows, roof detailing and green roofs. Slides were then presented from the drawing pack, including a 3D model, to illustrate the proposed development.

- Following up, members queried why CGI images showing the development within the surrounding street context had not been provided, noting that such images were commonly included for comparison in other applications. In response, David Glover (Head of Planning and Development Services) advised that there was no requirement for applicants to submit CGI images. It was explained that while such images were useful, they were often expensive to produce and were therefore less common for smaller developments. It was further noted that the models provided were felt to be sufficient to demonstrate the scale, form and siting of the proposed development, although they did not convey the full materiality of the scheme. Victoria McDonagh (Development Management Service Manager) additionally noted that conditions had been imposed to secure detailed information on external materials and contextual material palettes.
- As a further issue highlighted regarding the proposed basement excavation, members queried the potential risks to neighbouring properties, including any risks associated with subsidence or ground movement. In response, Mahya Fatemi (Career Grade Planning Officer) confirmed that the applicant had submitted a Basement Impact Assessment. Members were advised that the assessment included structural details, engineering calculations, ground stability analysis, flood risk considerations and construction methodology. It was further noted that certain aspects of the basement construction would also be regulated through Building Control and Building Regulations, in addition to the planning process.
- Concerns were expressed that the proposed development did not sufficiently consider long-term sustainability. Members questioned whether the delivery of two dwellings would meaningfully contribute to meeting housing needs and asked whether any assurance existed that the units would not be used as bed and breakfast accommodation in the future. Members further expressed the view that the development constituted overdevelopment and could result in a detrimental impact on the character and quality of the surrounding area. In response, Damian Manhertz (Development Management Area Manager) informed members that properties on Sneyd Road generally occupied larger plots and were more closely aligned in size and form to the original houses. He further advised that local planning policy, particularly in areas with higher Public Transport Accessibility Levels (PTAL), supported flexibility and anticipated changes in character over time. It was explained that these policies enabled greater optimisation of smaller sites, including those that did not reflect traditional plot sizes. In relation to the question of occupancy and use, Damian Manhertz (Development Management Area Manager) stated that it was not possible at the planning stage to determine definitively how the properties would be occupied. It

was noted that similar developments had been delivered elsewhere and were, in many cases, occupied by residents within the borough. Members were advised that the proposal met relevant space standards and policy requirements for high quality residential accommodation, and on that basis it was considered acceptable from a planning policy perspective.

Victoria McDonagh (Development Management Service Manager) further added that the use of the property as a House in Multiple Occupation (HMO) would require planning permission due to the presence of an Article 4 direction in place since 2002. It was explained that even small-scale conversion to a HMO or flats, would require a separate planning application. It was confirmed that the application under consideration had been assessed as Class C3 dwellinghouses and that any alternative use would need to be considered independently through the planning process.

- Questions were then raised on whether the Council would be reviewing its Local Plan, to which David Glover (Head of Planning and Development Services) responded that work on the new Local Plan was scheduled to commence later in the year. Following on from the previous question, members queried whether issues relating to the adequacy of dwelling size and quality could be addressed within the new Local Plan by future decision makers. In response, David Glover (Head of Planning and Development Services) noted that current standards for residential space were derived from the London Plan, which in turn reflected national standards. It was further explained that these standards established a consistent baseline for housing quality across the country, with some limited adjustments at London level. Members were advised that standards relating to daylight and sunlight had been in place for a number of years and had been updated to provide detailed guidance on acceptable living conditions. It was confirmed that policies could be reviewed as part of the Local Plan process.
- Members observed that previous planning decisions had shown that refusals could lead to redesigned schemes and suggested that, in this case, refusal might encourage a more comprehensive development involving adjoining properties, potentially delivering larger family sized homes. It was suggested that such an approach might result in greater long-term benefit. In response, David Glover (Head of Planning and Development Services) advised that refusals could result in an appeal, a revised application, or the abandonment of a proposal. It was emphasised that the Committee must determine the application based only on the proposal presented before it.
- With reference to page 74 of the committee report, members then moved on to question the statement that breaches of the 45-degree guideline in relation to the rear garden of Nos. 60A and B, 62 A, B and C and 64 Olive Road must be weighed against the benefit of delivering two new homes. It was questioned whether this implied that housing need took precedence over established planning guidelines. In response, Mahya Fatemi (Career Grade Planning Officer) presenting slides from the drawing pack to illustrate the proposed plans and elevations. It was explained that much of the proposed footprint would align with existing structures, with an approximate projection of 1.1 meters on the ground floor and from the outbuilding towards No. 60 Olive Road, it would project

forward. Members were advised that some impact on light and outlook was anticipated, but this had been assessed against the benefits of delivering additional housing and improving the current site conditions. It was confirmed that a daylight and sunlight assessment had been submitted, including an assessment of overshadowing. The results indicated that No. 60 Olive Road would retain 99% of its former daylight value, No. 62 Olive Road would retain 94%, and No. 64 Olive Road would retain 98%, while other properties would experience no measurable impact. Members were informed that these findings formed part of the overall assessment of impact on neighbouring properties and their gardens.

Victoria McDonagh (Development Management Service Manager) further mentioned that the proposal complied with Building Research Establishment guidance in respect of sunlight. It was acknowledged that the flank wall of the new dwellings would be visible from neighbouring gardens and would alter visual outlook to some degree. Members were advised that the impact was partly mitigated by existing outbuildings, but that some change in visual amenity would occur. It was confirmed that these impacts had been clearly identified and weighed against the benefits of the scheme in accordance with relevant planning policies, including those relating to site optimisation and changing character in line with the London Plan and Policy BH4.

- In considering the overriding position for more homes in Brent, members were keen to seek details on whether there was any evidence of changes in demand for specific housing types, particularly in relation to two bedroom dwellings. In response, Victoria McDonagh (Development Management Service Manager) explained that planning policy did not specify exact percentages for different dwelling sizes beyond an expectation that approximately 25% of housing provision should be family sized, taking into account the overall housing target of delivering approximately 2,300 homes per year. It was noted that the current proposal fell below that threshold, as it consisted of two bedroom units. However, it was highlighted that there was no policy requirement for every scheme to provide specific types of housing, particularly where no existing family sized dwelling was being removed. It was additionally stated that housing delivery was guided by overall targets set by Government and the Local Plan, rather than by detailed requirements for each individual application. It was also noted that market demand also influenced the types of housing that developers chose to bring forward.

David Glover (Head of Planning and Development Services) additionally noted that housing need was assessed at the plan making stage. It was explained that national Government set out to local authorities methods for calculating housing need, which informed targets subsequently embedded within the London Plan and local plans. Members were informed that the London Plan was currently under review and that updated figures were expected in the near future. It was further stated that future Local Plan work would include a detailed housing needs assessment to inform policy. Members were further advised that current indications suggested that housing targets could increase significantly to approximately 3,000 homes, with a substantial proportion comprising two bedroom dwellings alongside other housing types.

- As a final query, members sought details regarding the size of the rear amenity space and whether this would consist of hardstanding. In response, Mahya Fatemi (Career Grade Planning Officer) clarified that the proposal would provide approximately 34 sqm of private amenity space across basement, ground floor and first floor levels, including a balcony. It was confirmed that the plans showed peripheral planting within the amenity areas and that the provision exceeded the policy requirement of 20 sqm per dwelling.

## DECISION

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

- (1) The conditions and informatives, as detailed in the main and updated within the supplementary committee report.

(Voting on the above decision was as follows: 5 in favour of granting planning permission and 3 in favour of refusal).

## 6. Any Other Urgent Business

There was no other urgent business.

The meeting closed at 8:10 pm

COUNCILLOR S BUTT  
Chair

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## 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  
Item No  
Case Number

2 July, 2026  
04  
26/0225

## SITE INFORMATION

RECEIVED	30 January, 2026
WARD	Wembley Central
PLANNING AREA	Brent Connects Wembley
LOCATION	Brent NHS Primary Care Trust, Wembley Centre For Health & Care, 116 Chaplin Road, Wembley, HA0 4UZ
PROPOSAL	Demolition of existing buildings to provide within buildings of between 3 and 6 storeys, 108 residential units (Use Class C3) and car parking spaces together with associated public realm, landscaping and highway improvements, cycle parking and stores, and all other associated and ancillary works.
PLAN NO'S	See condition 2
LINK TO DOCUMENTS ASSOCIATED WITH THIS PLANNING APPLICATION	<p><b><u><a href="#">When viewing this on an Electronic Device</a></u></b></p> <p>Please click on the link below to view <b>ALL</b> document associated to case  <a href="https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&amp;keyVal=DCAPR_176340">https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&amp;keyVal=DCAPR_176340</a></p> <p><b><u><a href="#">When viewing this as an Hard Copy</a></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 "26/0225" (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 the 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. *Training and employment of Brent residents* - Prior to a material start:
  - a. to inform Brent Works in writing of the projected number of construction jobs and training opportunities and provide a copy of the Schedule of Works;
  - b. to prepare and submit for the Council's approval an Employment Training Plan for the provision of training, skills and employment initiatives for residents of the Borough relating to the construction phase of the Development
  - c. financial contribution (estimated to be £29, 700; calculated in accordance with Brent's Planning Obligations SPD) to Brent Works for job brokerage services.

#### 4. *Energy assessment*

Prior to a material start submission and approval of a detailed design stage energy assessment. Initial carbon offset payment (estimated to be £73, 365 / £95 per tonne) to be paid prior to material start if zero-carbon target not achieved on site.

- a. Post-construction energy assessment. Final carbon offset payment (calculated at £95 per tonne) upon completion of development if zero-carbon target not achieved on site.
- b. 'Be seen' energy performance monitoring and reporting

5. *Travel Plan* – Submission, approval and implementation of full Travel Plan (based upon the submitted framework Travel Plan).

6. Play space contribution of £50,000, in relation to improvements to nearby open spaces.
7. Car free restriction; parking permit restriction to be applied to all new residential units, save for disabled badge holders.
8. Healthy Streets / Active travel improvements contribution – £20, 000 to support Healthy Streets improvements in the vicinity of the site as recommended in the Healthy Streets Assessment.
9. *Affordable Housing*; Secure provision of a minimum 11no. affordable housing units at rent levels no higher than London Affordable Rent level and to secure 100% nomination rights on initial lets and 75% on subsequent lets for those on the Council's housing waiting list.
10. Suitably timed viability reviews (early and late stage).
11. Permissible Path, which means the route referred to within the main body of the report as "Fairview Walk".
12. Permissive Path Management Plan, which means a plan in respect of the proposed management arrangements for the Permissive Path.
13. Biodiversity Net Gain: related obligations, including Habitat Management and Maintenance Plan / Survey and Monitoring Report for Net Gain and monitoring fee for the 30-year period (calculated to be £31, 914.00).
14. Indexation of contributions in line with inflation from the date of committee resolution until date of payment.

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

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

Conditions

*Compliance*

1. Three-year time limit rule
2. Approved drawings and documents
3. Number of dwellings
4. Water consumption
5. Non-road mobile machinery (NRMM)
6. Provision of cycle and refuse storage
7. Wheelchair dwellings
8. Fixed plant noise
9. Sustainable urban drainage
10. Construction Management Plan
11. Construction Logistics Plan
12. Urban greening factor
13. Arboricultural method statement & tree protection measures
14. EV charging provision
15. Phasing plan
16. Amenity space provision
17. Highway works
18. Removal of Permitted Development rights (houses)

*Pre-commencement*

19. Site contamination
20. Piling method statement

*Pre-above ground works*

21. Architectural features
22. Materials
23. External sound insulation measures
24. Internal plant noise
25. PV array
26. Wildlife enhancement measures

*Pre-completion of superstructure*

27. Soft landscaping
28. Hard landscaping
29. Children's play space
30. Secure by Design

*Pre-completion of external building envelope*

31. Heritage interpretation
32. External lighting

*Pre-occupation*

33. Delivery, servicing & waste management plan
34. Car parking management plan

Informatives as listed in the Committee Report.


That the Head of Planning and Development Services 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, Informatives, planning obligations or reasons for the decision) prior to the decision being actioned, provided

that the Head of Planning and Development Services 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.

That, if by the “expiry date” of this application (subject to any amendments/extensions to the expiry date agreed by both parties) the legal agreement has not been completed, the Head of Planning and Development Services or other duly authorised person is delegated authority to refuse planning permission.

That the Committee confirms that adequate provision has been made, by the imposition of conditions, for the preservation or planting of trees as required by Section 197 of the Town and Country Planning Act 1990.

**SITE MAP**

	<b>Brent</b>	<b>Planning Committee Map</b>
Site address: Brent NHS Primary Care Trust, Wembley Centre For Health & Care, 116 Chaplin Road, Wembley, HA0 4UZ		
© Crown copyright and database rights 2011 Ordnance Survey 100025260		



This map is indicative only.

## **PROPOSAL IN DETAIL**

The proposal seeks planning permission to demolish the existing Old Wembley Hospital buildings on the site, along with the former Ambulance Station and redevelop the site to provide replacement residential buildings ranging from 3 to 6 storeys comprising of;

- 108 dwellings (99 flats and 9 houses);
- Which include 11 affordable homes (all at London Affordable Rent level);
- New public realm, including landscaped publicly accessible pedestrian route connecting Chaplin Road and Fairview Avenue;
- Outdoor amenity space, including private balconies, terraces, communal courtyard, and children's play space;
- Associated landscaping, including new trees; and
- Vehicle parking and cycle parking spaces

## **EXISTING**

The site is immediately east of Wembley Centre for Health (WCfH), and it currently comprises the now vacant Old Wembley Hospital, which comprises a group of single and two-storey former hospital buildings and a former ambulance station. There are existing parking areas associated with WCfH, and areas of landscape dispersed around the site.

Access to the site is currently via Chaplin Road and Fairview Avenue.

The surrounding area to the east and south is predominantly low-rise residential, and within the wider hospital site are some taller buildings. To the north-west is a Royal Mail Delivery Office (single storey), to the north is Wembley Police Station (part 3/part 5-storeys), and to the north-west is the Wembley Fire Station (3-storeys). These three buildings all front Harrow Road.

The site is c.300 west of the Wembley Growth Area. It is not located within a Conservation Area and does not comprise of any locally or statutorily listed buildings. The Old Wembley Hospital buildings are identified as a non-designated heritage asset, as addressed later in this report.

The site is included as part of Local Plan site allocation (BSWSA 13, which is discussed further in the body of this report) that also includes the Police and Fire Station sites to the north.

## **AMENDMENTS SINCE SUBMISSION**

Amended proposals and updates to supporting documents were received during the course of the application, summarised as follows:

- Increased affordable housing offer to include 11 affordable homes, at London Affordable Rent levels
- Re-location of disabled parking bays close to the Fairview Avenue access
- Cycle parking strategy amended
- Minor updates to the landscape strategy
- Minor design changes to the terrace fronting Chaplin Road, consisting of changes to articulation and fenestration
- Minor updates to Biodiversity Net Gain Assessment (and accompanying BNG Metric), Construction Logistics Plan, Construction Management Plan and Arboricultural Method Statement

Due to the scale and nature of the amendments and updates proposed since the application was submitted, it has not been deemed necessary for further public consultation to have been carried out. Where relevant though further consultation has taken place with internal and external consultees.

## **SUMMARY OF KEY ISSUES**

The key planning issues for Members to consider are set out below. Objections have been received from three individual addresses as well as a petition with 65 signatories, whose reasoning for objecting to the proposal is set out in the 'Consultations' summary section. Members would have to balance all the planning issues and objectives when making a decision on the application, against policy and other material

considerations.

**Neighbour objections:** As set out in the 'Consultations' summary below, objections received relate to (but are not limited to the following); absence of any space for community use, proposed height, being excessive and out of character, development should consist of only semi-detached / terraced houses, proposal conflicts with separation distance and amenity test recommendations in SPD1, incorrect application of BRE guidance in relation to assessment of daylight and sunlight effects to neighbouring properties, detrimental impact on neighbouring residential amenity (including daylight and sunlight effects), insufficient parking provision would lead to problematic overspill parking, development would increase local road congestion, surface water flooding, impact on capacity of school places, noise impacts, dust pollution (during demolition and construction) and inadequate tree planting.

**Principle of development / land uses:** The principle of the residential redevelopment of the site is acceptable, particularly in respect of the site allocation requirements set out in policy BSWSA 13 of the Local Plan. The quantum of homes proposed (108) would contribute significantly to borough housing needs, including 26 homes (24%) as much needed family sized homes. The proposal would make efficient use of previously developed land in a sustainable location. The principle of the loss of the long-term vacant Old Wembley Hospital buildings has been considered against Local Plan policy BS11, and as the report acknowledges, the NHS has confirmed the existing buildings are surplus to their requirements and on balance, the loss of the buildings is considered to have been satisfactorily justified. Whilst some harm would arise from the removal of the existing buildings, it is considered that this harm is limited and must be weighed against the benefits of the proposed development as part of the overall planning balance. This is discussed in more detail in the principle of development section below.

**Affordable housing and mix of residential accommodation:** The application is proposing 11 affordable dwellings all as London Affordable Rent, equating to 10% affordable housing (by unit) and 10.2% (by habitable room). Whilst the proposal does not provide a policy-compliant 70:30 tenure split within the affordable housing offer, all 11 affordable homes are proposed as London Affordable Rent, which is a low cost tenure most closely aligned with Brent's identified housing needs. The scheme therefore exceeds the minimum policy expectation for low-cost rented homes and delivers genuinely affordable accommodation. This approach is considered acceptable in principle. The proposed amount of affordable housing has been the subject of rigorous viability testing, and all parties conclude that the development, as proposed, would result in a viability deficit when measured against the benchmark land value, and therefore agree that the current proposed offer represents the maximum reasonable level of affordable housing the scheme can viably deliver at this time. Suitably timed (early and late stage) viability review mechanisms shall be secured.

The proposal includes 26 (24%) homes with at least three bedrooms, which is acknowledged to be only marginally below the Local Plan BH6 policy target of 1 in 4 new homes to be family sized. This would provide a meaningful contribution of much needed family sized homes, including family sized affordable homes.

**Urban Design: site layout, height, scale, massing and appearance:** The site layout would result in an overall high level of compliance with SPD1, with only isolated shortfalls in separation distances to existing neighbouring properties. Buildings would be surrounded by generously proportioned landscaped areas, communal amenity areas and new public realm, which help to break up the development. The tallest elements of the scheme at 5/6-storeys are located away from nearby sensitive receptors and this massing strategy responds well to the existing context to the west and north-west, whilst displaying a considered stepping down of heights to 3 storeys towards the eastern site boundary. The siting, separation, massing, articulation and materiality of the buildings are all well considered elements. Active frontages have been maximised at ground floor across the site, and new landscaping, pedestrian route (Fairview Walk) and public realm would help to create a successful new place. The detailed design of the buildings is well considered and would be of high quality.

**Heritage effects:** Following consideration of the submitted Heritage Statement and other relevant supporting information, it is concluded that the proposed development would have no undue impact on any designated heritage assets. The proposed demolition of the non-designated heritage asset (the Old Wembley Hospital buildings) would result in some harm due to the total loss of the existing buildings. However, having regard to the asset's significance as a non-designated heritage asset, the degree of harm is considered to be limited. A balanced judgement is therefore required, having regard to the scale of the harm and the significance of the heritage asset, whilst also taking account of the wider public benefits arising from the redevelopment of the site. This matter is addressed in further detail later in the report.

**Quality of residential accommodation:** The residential accommodation proposed is of a sufficiently high quality, meeting the particular needs and requirements of future occupiers, including adequate provision of

accessible homes. The accommodation would achieve good outlook and light, with only a relatively low proportion of single aspect homes (with no single aspect north facing homes). The buildings achieve good levels of separation distances between them, and in places this is more than the minimum 18m typically sought in new development. The overall amount and different type of external amenity space (private and communal) does not fully meet Brent's target requirements as set out within policy BH13 (20sqm & 50sqm depending on the size and type of dwelling). However, the provision of amenity space on site has been reasonably maximised for its location and quantum of development, along with the provision of good quality communal space along with areas of public realm. What is proposed is of sufficiently high quality, as demonstrated through the Amenity Space and Place Quality submission, and would provide a good variety of different types of amenity space (including new publicly accessible private open space) as well as on site play provision for younger age groups, resulting in amenity space of a sufficient type and size for future occupants. A financial contribution is to be secured also for the enhancement of existing open space / play provision in the locality, which would be a public benefit.

**Relationship with neighbouring sites and assessment of amenity impacts:** Impacts on privacy, outlook, daylight, sunlight and overshadowing to nearby sensitive receptors have been assessed. It is recognised that there would be some impact on neighbouring properties, with some existing nearby residential properties expected to experience impacts to daylight and outlook, and there would be some shortfalls against BRE guidance. These adverse effects are however isolated to one part of the site, and this harm would be limited. The proposal is for the comprehensive redevelopment of the site, which currently comprises relatively low-scale buildings that are part single / part two-storey, and lower in scale than some of the buildings proposed. In this context and given the prevailing site conditions some degree of adverse impact is to be expected in relation to development that is seeking to make efficient use of the site to deliver additional housing and given the close proximity of some neighbouring properties to the shared site boundary. Any harmful amenity effects identified would be balanced against the planning benefits overall. In other respects, the proposed layout, relationship to boundaries and internal layouts respond well to the site constraints.

**Sustainability, energy, whole-life carbon and circular economy:** 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 and demand reduction measures, as well as through renewable energy technologies proposed in the form of air source heat pumps and solar PV panels. A contribution to Brent's carbon-offsetting fund would be secured through the s106 agreement, to offset residual emissions to achieve net zero.

**Environmental health considerations:** The development would be air quality neutral. Noise and contaminated land impacts have been duly considered, and Brent's Environmental Health officers consider these aspects to be acceptable for future residential occupiers (and existing neighbouring residents) subject to planning conditions. Detailed Construction Management and Construction Logistics Plan(s) set out how potential environmental impacts, such as dust and noise, would be managed, reduced and mitigated during demolition and construction phases.

**Flood risk and drainage:** A detailed 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). Limited areas of the site are categorised as being at risk from surface water flooding, and this risk has been addressed through the drainage / SuDS strategies, with mitigation measures proposed. The proposed strategy, including SuDS features show that post development there would be a significant betterment in surface water runoff rates which is an improvement from a flood risk perspective. No objections are raised by the Local Lead Flood Authority, or Thames Water to the proposed strategies. Relevant conditions are to be secured.

**Landscape, trees, biodiversity and urban greening:** A comprehensive tree planting strategy is proposed that demonstrates a significant net increase in trees across the site, with c.177 new trees to be planted. The proposed retention of existing mature trees along the Chaplin Road frontage, which make a positive contribution to visual amenity as well as biodiversity, is strongly supported. It has been demonstrated the proposal would result in a measurable biodiversity net gain (+10%) because of the development and once the landscaping proposals have been implemented. No negative ecological effects are considered likely either. The Urban Greening Factor of 0.40 indicated is in accordance with the policy target and would be an enhancement compared to existing site conditions. Overall, the development would lead to positive biodiversity and green infrastructure outcomes when compared to the current baseline conditions.

**Transport considerations:** The site is in a sustainable location (PTAL 4) and the development proposes some on-site parking for allocation to specific dwellings, with the rest of the dwellings to be car-free (and subject to vehicle permit restrictions for parking on-street), with adequate provision made for cycle parking in

line with standards and sustainable transport further encouraged through the requirement for a Travel Plan to be approved and implemented. Increased pedestrian permeability would be achieved because of the site layout, which proposes Fairview Walk, a new permissive pedestrian route, and additionally a Healthy Streets contribution (£20, 000) is committed to which would support further pedestrian improvements in the vicinity. The deliveries and servicing strategy (both during construction and operation) is set out in detail the relevant supporting documents. The proposals are considered acceptable in relation to the potential transport related impacts, subject to the recommended conditions and obligations, as set out.

**RELEVANT SITE HISTORY**

There is a long planning history relating to the wider NHS Estate. Recent applications of relevance include the following:

**25/3046** – Granted 27.01.26

Demolition (in part) of existing buildings with associated external alterations to retained buildings, reconfiguration of existing car parking area to provide 27 parking spaces, including continuation of existing one-way vehicle exit route together with repositioning of existing security gates and fencing, landscaping, re-located bin stores and other associated works (including proposed boundary fencing).

**CONSULTATIONS**

**Public consultation**

A total of 99 nearby properties were notified of the proposed development by letter on 18.02.26. In addition, several site notices were displayed in the locality on 04.03.26, including locations on Linthorpe Avenue, Chaplin Road and Fairview Avenue. A press notice was published on 26.02.26

Representations objecting to the proposals were received from three individual addresses (noting that for some more than one representation has been received during the course of the application). A petition objecting to the development with 65 signatories has also been received. The petition was submitted by Cllr Paul Lorber. The grounds for objection received are summarised in the table below.

<b>Representation Comments</b>	<b>Officer Remarks</b>
<b>Principle of development / uses</b>	
Development makes no provision for any community use / space.	This matter is considered in detail within the 'Principle of development' and 'Loss of social infrastructure' sections of the report.
<b>Overbearing scale of development and harmful impact on character on surrounding area</b>	
The height of the proposed buildings at 5-6 storeys is overbearing, excessive and out of character with the area.	Scale and height have been considered in relation to relevant policies and SPD, and a planning judgment has been applied considering the surrounding context, which includes adjacent non-residential buildings of a similar scale. This matter is considered in detail within the 'Design' section of the report.
Proposal is contrary to SPD1 recommendations in relation to the 18m separation, 30-degree test and 45-degree test.	Relationship of the proposed development to surrounding properties has been considered holistically against BRE guidelines, relevant policies and SPD1. While some non-compliance and adverse impacts are identified these are isolated and have been balanced against material considerations, including site optimisation and the existing urban context.  This matter is discussed in detail in the 'Relationship with neighbouring sites and assessment of amenity impacts' section of the report.
Proposal should consist of semi-detached and terraced housing only.	The proposal provides an appropriate mix of apartment blocks, semi-detached and terraced

	<p>dwelling. This makes efficient use of the site for delivery of homes, and the massing strategy proposed responds appropriately to the existing context, stepping development down in height towards the eastern boundary.</p> <p>Policy at the London and local levels seek to optimise site capacity, particularly in accessible locations. There is no policy justification for only supporting semi-detached and or terraced homes on site.</p>
<b>Amenity:</b>	
<p>Loss of daylight, sunlight and privacy to neighbouring properties</p>	<p>Effects of the proposed development to surrounding properties has been considered holistically against BRE guidelines, relevant policies and SPD1.</p> <p>This is considered in detail within the 'Relationship with neighbouring sites and assessment of amenity impacts' section of the report.</p>
<p>Incorrect application of BRE guidance by applicant when assessing daylight / sunlight effects to neighbouring sensitive receptors. They have not treated the ground floor kitchen window to 15 Fairview Avenue as habitable, and this window will experience reductions to VSC and NSL.</p>	<p>For the purposes of assessing this proposal and the impacts on this window the window has been treated as a habitable window.</p> <p>In cases where technical non-compliance occurs, it is important to note BRE targets are guidelines rather than absolute standards. Planning judgement is required with regards the level of impact.</p> <p>Impacts have been considered for daylight as well as sunlight. This is considered in detail within the 'Relationship with neighbouring sites and assessment of amenity impacts' section of the report.</p>
<p>Applicants use of the mirrored is inappropriate in the low-density context.</p>	<p>The mirrored baseline assessment undertaken is an accepted BRE approach used for testing site optimisation. This tests whether a proposed scheme causes materially greater daylight/sunlight impacts than a comparable form of development could reasonably be expected to cause. Notwithstanding this, in assessing the proposed development primary consideration has been given to VSC / NSL / APSP BRE tests undertaken, as set out in the submitted Daylight and Sunlight Report and considered in detail within the 'Relationship with neighbouring sites and assessment of amenity impacts' section of the report.</p>
<p>Daylight impacts on first floor bathroom of 15 Fairview Avenue.</p>	<p>Reductions to this room are noted, however, bathrooms are considered non-habitable under BRE guidance.</p>
<p>Impact on living room flank wall windows.</p>	<p>VSC reductions are noted, but as the report acknowledges, these windows are high level flank elevation windows where the living room is primarily served by a window in the rear elevation. The principal rear window / outlook to this room is not adversely affected by the proposal, retaining a VSC of 32% - as set out in the 'Relationship with neighbouring sites and</p>

	assessment of amenity impacts' section of the report.
Application has failed to test daylight / sunlight effects to outbuilding in rear garden of 15 Fairview Avenue.	This building was approved under Permitted Development rights, for purposes incidental to the existing dwellinghouse. It is not considered a habitable room under BRE guidance. On this basis it has not been included within the daylight and sunlight assessment.
Overshadowing of neighbouring garden.	Impacts have been assessed, and this is considered in detail within the 'Relationship with neighbouring sites and assessment of amenity impacts' section of the report.
Houses 100-103 (and possibly 104-105) should be omitted or moved further into the site.	The impacts of these houses are considered in detail within the 'Relationship with neighbouring sites and assessment of amenity impacts' section of the report.
Location of external bin stores to dwellings 100-103 will present an odour nuisance to 15 Fairview Avenue	Noted, however, the bins will be housed within bin enclosures and sufficient separation is considered to have been maintained.
Refuse collection strategy places a collection point close to 15 Fairview Avenue, which will be harmful to residential amenity. The collection point should be re-located	The collection point referred to is only for one of the houses (unit 100), as such it is not considered this arrangement would give rise to conditions unduly harmful to neighbouring amenity.
Any new gates / boundary treatments should not block access to 15 Fairview Avenue	Comment subsequently withdrawn by objector following clarification provided by applicant.
Location of site welfare compound close to 15 Fairview Avenue will lead to noise and odour issues.	The siting and arrangement of this compound has been revised during the application to move this further away from the boundary with No.15, to reduce potential impacts. This is reflected in the revised Construction Management Plan as well as the revised Construction Logistics Plan. Whilst impacts are likely to still be experienced to a degree, these will be time-limited only, whilst the construction phase is on-going. Additionally, space constraints and the phased build programme on site limit where this welfare accommodation can feasibly be located within the site.
Noise levels associated with any mechanical ventilation system, and effect of this on 15 Fairview Avenue.	Applicant has confirmed that ventilation is in reference to natural ventilation with no air-conditioning proposed. Conditions attached require compliance with specific noise levels, to reduce potential for disturbance.
Development is too dense and will lead to a poor quality of accommodation for future occupiers.	Site optimisation of previously developed land in sustainable locations is supported in overall policy terms. The proposal has been assessed against all relevant national standards, policies and guidance – see 'Quality of accommodation' section of the main report for further details.
<b>Infrastructure</b>	
Will increase strain on existing school places nearby.	There is no specific policy requirement for additional school places or provision of schools to support housing growth in this part of the borough. The provision of school places and other infrastructure required to support development is set out within the Infrastructure Delivery Plan that supports policies within the Local Plan.
<b>Transport</b>	

<p>There is insufficient parking and residents will park on nearby roads outside of CPZ hours.</p>	<p>The development would have low levels of parking, including the provision of 12 on-site parking spaces, which reflects the site's high PTAL, and is in line with London Plan (policy T6) and Local Plan policies. This approach to non-car modes of travel is acceptable in a sustainable location such as this where there are very good public transport options, and this is supported by strategic and local planning policies.</p> <p>A car-free restriction would apply for all future residents (except for blue badge holders), and shall be secured via s106 legal agreement, which would mean they would be ineligible for applying for on-street parking permits within the locality. This is a tried and tested means of ensuring new development does not result in problematic overspill parking in the surrounding roads during CPZ operating hours.</p> <p>Please refer to the 'Transport and access' section of the report for further details.</p>
<p>Will lead to increased congestion on roads in the area.</p>	<p>The submitted Transport Assessment has fully considered potential effects on the highway network, including trip generation, with no objection raised on these grounds by Highways officers – refer to 'Transport and access' section of the report.</p>
<p>Construction vehicles should access the site via Chaplin Road and not Fairview Avenue.</p>	<p>Such an arrangement would not be practical, as discussed in the 'Transport and access' section of the report.</p>
<p>Further clarification requested in relation to construction delivery times.</p>	<p>Refer to the 'Transport and access' section of the report.</p>
<p><b>Flooding / drainage</b></p>	
<p>Location of proposed wheel-washing facility for use during construction will lead to localised surface water flows on Fairview Avenue.</p>	<p>Wheel washing facilities are a standard construction mitigation measure used to prevent mud and debris being transferred onto the highway. It is not envisaged the facility would be used to such regularity that it would present any flooding risks locally and at source measures are proposed to manage such impacts. This is confirmed in the submitted Construction Management Plan rev03.</p>
<p><b>Landscaping</b></p>	
<p>Inadequate provision of trees on site</p>	<p>The small number of trees proposed for removal to facilitate development will be clearly outweighed by proposed tree planting, which will result in a net increase of c. 177 trees. This is discussed in detail within the 'Green infrastructure' section of the report.</p>
<p><b>Environmental health considerations</b></p>	
<p>Harmful noise impacts during demolition and construction periods.</p>	<p>Some noise impacts from demolition / construction works are to be expected and is unavoidable. Such impacts would be a temporary / time-limited and managed / controlled in accordance with the submitted Construction Management Plan rev03 and other secondary legislation.</p> <p>Refer to Environmental health section of the report for further details.</p>

Dust pollution during construction will cause a nuisance for nearby residents.	Please see above – the Construction Management Plan Statement to be secured by condition sets out site wide measures to minimise impacts on air quality during construction, such as from dust.  A Construction Logistics Plan will also be secured as part of a condition to any forthcoming consent, which will also contain site wide measures to further mitigate any temporary effects.
<b>Other</b>	
Given the likely presence of asbestos within the buildings proposed for demolition, it is requested that a copy of the referred to asbestos survey be shared, and that consultation is undertaken on any remediation measures proposed.	Applicant has confirmed an Asbestos Survey has been undertaken. In any event, removal of asbestos is regulated (and enforced) through primary environmental and / or Health and Safety related legislation. It is not controlled through Planning legislation.
Proposals ignore the site's heritage.	Heritage effects have been considered in detail within the 'Heritage effects' section of the main report.
Development will lead to increased risk of flooding / surface water flooding.	Please see 'flood risk, drainage and water' section of the report. The application is supported by a detailed FRA and Drainage Strategy and these adequately assess the risk of flooding, including from surface water flooding, with an appropriate mitigation and SuDS strategy proposed that will result in a betterment compared to existing unattenuated site conditions. The LLFA has no objection to the SuDS strategy principles, subject to the drainage strategy being secured by conditions
Purported scheme benefits do not outweigh harm to neighbouring amenity.	Refer to 'Planning Balance' section of the main report.

### **Statutory / Non-statutory consultees**

**Greater London Archaeological Advisory service:** No objections raised.

**Thames Water:** No objection raised. A condition in relation to the submission of a Pilling Method Statement is required.

**LLFA:** No objection raised (refer to 'Flood risk and drainage' section below)

#### **Internal consultations**

**Environmental Health:** Environmental Health raises no objections to the application subject to conditions. See 'Remarks' section of report for further comments on these issues.

### **Statement of Community Involvement**

The NPPF and Brent's Statement of Community Involvement set out an expectation that developers will undertake a proportionate level of engagement with the local community prior to submitting a planning application.

A Statement of Community Involvement (SCI) has been submitted with the application, setting out the level of consultation and engagement undertaken by the applicant prior to formal submission of the application, in February 2026. The SCI confirms there was engagement with a range of local stakeholders, including elected representatives, community groups, resident's associations and local businesses, throughout the pre-application process.

The consultation prior the application being submitted comprised two rounds of public engagement. The first took place between 9 July 2025 and 23 July 2025, with the consultation period extended to 6 August 2025 to allow for additional responses. Additionally, a newsletter was distributed to approximately 2,506 local addresses, providing information on the emerging proposals and details of how to participate. A dedicated consultation website was established, providing access to exhibition materials and an online feedback form, alongside a consultation email address and telephone line. A public drop-in event was held on 14 July 2025 at St John's Community Centre, attended by approximately 30 members of the public.

Following review of the feedback received from the first event and further development of the scheme, a second round of consultation was undertaken between 24 November 2025 and 12 December 2025. This included the distribution of a further newsletter to approximately 2,508 local addresses, updates to the consultation website setting out revisions to the scheme, and a second public exhibition event held on 2 December 2025 at the same venue, attended by 23 residents. Across both consultation periods, a total of 40 feedback forms and 13 emails were received.

As set out above, consultation was undertaken through a range of methods, ensuring opportunities were available for a broad cross-section of the community to engage with the proposals. Key stakeholders were also directly contacted and offered the opportunity to engage further with the project team.

Feedback received identified several key themes, including comments / concerns relating to overdevelopment, impact on local infrastructure, traffic and parking, building height, design, and land use. The applicant has set out within the submitted SCI how these issues have been considered and responded to, including amendments to the scheme such as a reduction in the number of units from up to 115 to 108, and adjustments to building heights and layout to better reflect the surrounding context.

Overall, it is considered that the extent of consultation undertaken prior to submission, including two rounds of public engagement, the scale of distribution of consultation material and the variety of engagement methods, is reasonable and proportionate to the scale of the development and consistent with the expectations set out in Brent's published SCI.

As referred elsewhere, prior to submission the proposed development went through Brent's Design Quality Review and separate Community Review process, where it was scrutinised by panel members. A pre-application presentation was also made to Members of the Planning Committee. Feedback received from this engagement has informed the submitted proposals.

## **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, relevant to this proposal, is comprised of the:

London Plan (2021)  
Brent Local Plan (2019-2041)

Key policies include:

### London Plan (2021)

GG1: Building strong and inclusive communities  
GG2: Making the best use of land  
GG4: Delivering the homes Londoners need  
GG5: Growing a good economy  
D1: London's form, character and capacity for growth  
D2: Infrastructure requirements for sustainable densities  
D3: Optimising site capacity through the design-led approach  
D4: Delivering good design  
D5: Inclusive design  
D6: Housing quality and standards  
D7: Accessible housing  
D8: Public realm

D11: Safety, security and resilience to emergency  
D12: Fire safety  
D13: Agent of Change  
D14: Noise  
H1: Increasing housing supply  
H4: Delivering affordable housing  
H5: Threshold approach to applications  
H6: Affordable housing tenure  
H10: Housing size mix  
S1: Developing London's social infrastructure  
S4: Play and informal recreation  
E11: Skills and opportunities for all  
HC1: Heritage, conservation and growth  
HC3: Strategic and Local views  
G1: Green Infrastructure  
G5: Urban greening  
G6: Biodiversity and access to nature  
G7: Trees and Woodland  
SI1: Improving air quality  
SI2: Minimising greenhouse gas emissions  
SI3: Energy Infrastructure  
SI4: Managing heat risk  
SI5: Water infrastructure  
SI12: Flood risk management  
SI13: Sustainable drainage  
T1: Strategic approach to transport  
T2: Healthy streets  
T3: Transport capacity, connectivity and safeguarding  
T4: Assessing and mitigating transport impacts  
T5: Cycling  
T6: Car parking  
T6.1 Residential parking  
T7: Deliveries, servicing and construction  
T9: Funding transport infrastructure through planning

#### Brent Local Plan (2019-2041)

DMP1: Development management general policy  
BP7: South west  
BSWSA 13: site allocation  
BD1: Leading the way in good urban design  
BH1: Increasing housing supply in Brent  
BH2: Priority areas for additional housing provision within Brent  
BH5: Affordable housing  
BH6: Housing size mix  
BH13: Residential amenity space  
BSI1: Social infrastructure and community facilities  
BE1: Economic growth and employment opportunities for all  
BHC1: Brent's Heritage Assets  
BGI1: Green and blue 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  
BT3: Freight and servicing, provision and protection of freight facilities

The following are also relevant material considerations:

The National Planning Policy Framework (NPPF) (2024)  
Planning Practice Guidance

## Brent guidance documents

SPD1 Brent Design Guide (2018)  
S106 Planning Obligations Supplementary Planning Document (2022)  
Brent's Waste Planning Guide (2015)  
Residential Amenity Space & Place Quality SPD (2023)  
Sustainable Environment & Development SPD (2023)

## Other relevant policy and guidance documents

Mayor of London Housing Design Standards LPG  
Mayor of London draft Affordable Housing LPG (2023)  
Mayor of London draft Development Viability LPG (2023)  
Mayor of London Optimising Site Capacity: A Design-Led Approach LPG  
Mayor of London Urban Greening Factor LPG  
Mayor of London Sustainable Transport, Walking and Cycle LPG  
Mayor of London Air Quality Positive LPG  
Mayor of London Fire Safety LPG  
Mayor of London Support for Housebuilding LPG (2026)

London Cycling Design Standards  
Community Infrastructure Levy Regulations 2010

## **DETAILED CONSIDERATIONS**

### **Principle of redevelopment & proposed residential development**

1. The National Planning Policy Framework (hereafter referred to as the NPPF or the Frameworks) notes that plans and decisions should apply a “presumption in favour of sustainable development” (Paragraph 11), and this approach is reflected in Brent Local Plan Policy DMP1 and the other policies of the Local Plan. Policy DMP1 confirms the acceptability of developments subject to it satisfactorily addressing the broad issues identified, to secure development that improves the economic, social, and environmental conditions in Brent.
2. Chapter 11 of the NPPF promotes the effective use of land in meeting the need for new homes, as set out in paragraph 124 which states;

*“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.”*

3. NPPF paragraph 125, part c) sets out that planning decisions should “give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs”.
4. The aim of making effective use of land is carried forward in a number of development plan policies, including London Plan policy GG2, which identifies the optimisation of land, including the development of brownfield sites, as a key part of the strategy for delivering additional homes in London, as well as being reflected in policies D2 and D3 and policies in Brent's Local Plan.
5. The application site is previously developed brownfield land, in an accessible location, that is well connected to jobs, services, infrastructure and amenities. The development proposes housing led regeneration that would meet identified housing needs in the borough (and for London), including affordable housing need.
6. Chapter 5 of the NPPF (Delivering a sufficient supply of homes) states that the overall aim should be to meet an area's identified housing need, including with an appropriate mix of housing types for the local community. The Framework recognises that small and medium sized sites (such as the application site) can make an important contribution to meeting the housing requirements of an area.
7. Chapter 8 of the NPPF ('Promoting healthy and safe communities') advises that planning decisions should aim to achieve healthy places which promote social interaction, are safe and accessible and

enable and support healthy lives. Decisions should take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community, guard against the loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs, and that there is an integrated approach to considering the location of housing, economic uses and community facilities and services (paragraph 98).

8. London Policy S1 states that development proposals that make best use of land, including the public-sector estate, should be encouraged and supported. Development proposals that would result in a loss of social infrastructure in an area of defined need as identified in the borough's social infrastructure needs assessment required under Part A of the policy should only be permitted where:

*(1) There are realistic proposals for the re-provision that continue to serve the needs of the neighbourhood and wider community, or:*

*(2) The loss is part of wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to meet future population needs or to sustain and improve services*

9. Policy S1 also states that redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered, unless this loss is part of wider public service transformation plan.
10. Local Plan Policy BSI1 states that existing social infrastructure would be protected and retained unless it can be demonstrated that several criteria can be met. Relevant criteria include:
  - (a) The existing facility is not required in its current use and there is no demand for any other suitable community use on the site; and
  - (b) The loss of social infrastructure would not result in a shortfall in provision of that use
11. In reference to the above, where there is no longer a need for the facility's current use, the potential of re-using or redeveloping the site for an alternative social infrastructure use, must be considered before other uses are pursued.

*Local Plan site allocation policy:*

12. The site is located within Brent's Local Plan site allocation BSWSA 13 (encompassing a wider area, including Wembley Police and Fire Stations and WCfH), which seeks to retain existing police, fire and health facilities (with potential reconfiguration opportunities and opportunities for other community uses), and supports residential on any surplus land. The allocation recognises there are existing site inefficiencies due to historic piecemeal development and old building stock.

*Loss of social infrastructure:*

13. The site used to form part of the NHS' wider WCfH estate, which covered an area of 2.26ha and comprised the Old Wembley Hospital (located on the eastern part of the site), the newer WCfH (on the western half of the wider site), Barham House, and the new Community Diagnostic Centre (CDC) in the north-west of the site.
14. The application site covers only the Old Wembley Hospital part of the wider NHS estate, which ceased functioning for frontline medical, clinical and healthcare services in 2000 when the (then) new WCfH facility opened. Until 2019, the Old Wembley Hospital buildings that had been vacated in terms of frontline services provided only back-of-house office and IT storage to the wider Northwest London NHS portfolio. These uses were not publicly accessible and did not provide clinical, healthcare or community-facing services at any point during the period since 2000. In 2019 all tenants relocated and the site has been completely vacant since, save for a temporary period of use (2020-2021) when the buildings were used for PPE storage to support the Covid 19 response. The site has been hoarded off from the rest of the WCfH site for several years and is in a poor state of repair.
15. In reference to aforementioned policies S1 and BSI1, NHS Property Services (NHSPS) undertook a site disposal process to assess site conditions and establish whether the site was surplus to its requirements. This disposal process and steps taken leading to the site being marketed are summarised as follows;
16. **2017:** Brent Clinical Commissioning Group (CCG), now the Integrated Care Board (ICB), reviewed its estate strategy and identified the Old Wembley Hospital was surplus to needs. The site was described as *"permanently no longer required for all future commissioning requirements whether for commissioner*

*direct use or for the provision of health services*". As the buildings only previously housed administrative services it was confirmed that their loss would not impact on the delivery of public health services to the locality.

17. This led to the preparation of the Property Vacation Notice (PVN), by Brent CCG, as part of the Vacant Space Handback Scheme, to transfer site responsibility and running costs back to NHSPS.
18. **2019:** Brent CCG formally served the PVN, officially transferring ownership and responsibility of the Old Wembley Hospital back to the NHSPS to optimise site value as part of a disposal strategy. This served as a marker that Brent CCG (now the ICB) considered the existing facility was not required, and that it was surplus to healthcare requirements.
19. By December (2019), all back-of-house administrative functions had fully relocated to alternative locations within the wider North-west London catchment (at Willesden Centre for Health and Care, a practice in Sudbury, and Brent Civic Centre).
20. **2020:** A consultant team was appointed, who explored possible redevelopment opportunities, including its neighbours who are identified as part of the wider Site Allocation, and within the site itself. Due to a lack of appetite from adjacent landowners, and with the need to provide continuity of service on site, the potential for any wider redevelopment proposals was not pursued further at this time.
21. **2022:** Funding was secured by the Imperial College Healthcare NHS Trust to redevelop the Barham House car park to provide the new CDC building, after considering the application site under consideration here was too large for this purpose (n.b. this facility has since been delivered and is operational).
22. **2024:** The NHSPS entered the site within the Electronic Property Information Mapping Service (e-PIMS), which is a central database of Government Central Civil Estate properties and land. This listing gave other public bodies the chance to acquire the site before it was offered to the open market.
23. The site was listed on the database for the statutory timeframe of 40 working days, and this ended in July (2024), with no interest in the site acquisition having been expressed from other public bodies.
24. On conclusion of the NHSPS internal disposal strategy, a full and open market disposal campaign was undertaken by Savills. This marketing campaign undertook the following:
  - Electronic brochure distributed to over 3, 500 developers and operators (September 2024);
  - Advertisements placed in the Estates Gazette (September 2024);
  - Listed the site on Savills website, all related portals (e.g. Rightmove);
  - A comprehensive data room hosted detailed information which was shared, with access by over 70 parties; and
  - First round bid deadline (October 2024), concluding a 6-week marketing process
25. In response, there was some initial interest from parties wishing to use the site for religious purposes, none of which progressed their interest beyond an initial enquiry. There was otherwise no other interest from community-based users received.
26. Only five first round bid proposals were received. All parties were then invited to submit best and final round offers (by November 2024), taking the total marketing process to 8-weeks. One party dropped out by the bid deadline, and one later withdrew, leaving three interested parties each proposing residential development. This process demonstrated that the primary interest in the site was for residential development.
27. The applicants (Fairview new Homes Limited) bid was considered, by NHSPS to represent best value to the public purse, and the agreement was conditional, on the delivery of the re-provision of a staff car park for the wider NHS estate (which is the subject of planning permission ref: 25/3046).

*Conformity with policy, including site allocation policy BSWSA 13:*

28. In reference to policy BSI1, criteria (a) the applicants have submitted evidence to demonstrate the site is not required for frontline medical, clinical and healthcare use, and that it is surplus to both current and future NHS operational needs. Additionally, it is confirmed that previous back-of-house functions that took place in the Old Wembley Hospital buildings have been consolidated into alternative facilities in the

borough. A letter from NHSPS (dated June 2025) further corroborates the timeline of events between 2017 - 2024, as summarised above, which culminated in the decision taken by NHSPS to dispose of the site. The ICB (formerly Brent CCG) have been consulted on the current proposals and raised no objection.

29. In terms of demonstrating that there is no demand for any other suitable community use on the site, Local Plan supporting text at paragraph 6.3.9 states *“With regards to loss, evidence should be provided demonstrating how the premises have been marketed at realistic rates for a minimum of 12 months. This will allow alternative community uses to bid prior to its use as a non-community facility.”* The submission does demonstrate that an open market marketing campaign was carried out, however, that this was not carried out entirely in line with relevant policy as the marketing campaign was not sustained over a 12-month period. Nevertheless, this must be considered in the wider context of the NHS disposal process. Prior to marketing, the site had been formally identified by the NHS as surplus to both current and future operational requirements, had been vacated for a prolonged period, and had been subject to a statutory public sector disposal process through the e-PIMS system, which did not generate interest from alternative public sector bodies. The subsequent open market disposal exercise attracted interest predominantly for residential redevelopment, with no substantive interest progressing from alternative community or social infrastructure operators. Whilst the evidence does not therefore demonstrate full compliance with Policy BSI1, it does provide a reasonable indication that there is limited prospect of the site being brought back into an alternative community use and this is a material consideration in assessing the overall planning balance.
30. In reference to policy BSI1, criteria (b), and to the question of whether the loss of social infrastructure would or would not result in a shortfall in provision of that use. As referred to above, the NHSPS, who is responsible for maintaining, managing and developing NHS primary care facilities, sought to dispose of the site only once commissioners (in this case Brent CCG, now ICB) had identified Old Wembley Hospital as being surplus to current and future needs and initiated the formal hand back process, in 2019. It is important to emphasise the Old Wembley Hospital buildings have not supported public facing medical, clinical and healthcare use for over 25 years, so not retaining the buildings for such use is not envisaged to harmfully impact on the ability to deliver public health services to the locality or result in any shortfall in provision. Going forward, the retained WCfH would continue to provide these vital healthcare services to the local community, and this facility is indeed to benefit from further investment through further expansion of the CDC facility.
31. NHSPS has confirmed that, in accordance with its statutory role and core objectives, proceeds from the disposal of the site would be reinvested into the retained Wembley Centre for Health and Care and, where necessary, the wider primary healthcare estate. This would support the ongoing modernisation and improvement of healthcare infrastructure, enabling investment in facilities that are fit for purpose and capable of meeting current and future healthcare needs. The disposal of a surplus and long-term vacant asset therefore provides an opportunity to release capital for reinvestment in frontline healthcare provision, helping to improve services and patient outcomes for the local community and wider population served by the NHS estate. This is considered to be a material public benefit arising from the redevelopment proposals. The proposal is considered to align with site allocation BSWA 13, which supports residential development coming forward on any surplus land.

### *Housing*

32. London Plan policy H1 sets out housing targets across London, with the current target for Brent being 23,250 new homes over the ten-year plan period. Local Plan policy BH1 responds to this by proposing plan-led growth concentrated in Growth Areas and site allocations to provide a minimum of 23,250 homes in the period up until 2028/29 and a minimum of 46,018 homes in the period up until 2041. Local Plan policy BP7 (South West) sets a minimum target of 10,600 additional homes in the period to 2041.
33. The quantum of dwellings proposed would contribute meaningfully towards the meeting the above stated housing targets (both for London and Brent).
34. The principle of development is assessed against the adopted Local Plan, London Plan and national guidance. Development should make efficient use of land, respect local character and deliver high-quality design in accordance with Policy DMP1 and BD1 of the Brent Local Plan and the London Plan's Good Growth objectives.

### *Land use summary*

35. The proposed redevelopment of the site involves the loss of the Old Wembley Hospital, which formed part of the NHS' wider estate in this locality. These buildings have not supported public facing medical, clinical and healthcare use since 2000. As set out above, it has been demonstrated the existing facility/buildings are no longer required in their current use, and that the site is deemed by NHSPS to be surplus to NHS requirements, including for the provision of any front facing services. Whilst this may be the case, as recognised above, prior to the site being disposed of by NHSPS the marketing campaign undertaken to establish demand for any other suitable community use, does not fully align with policy BS11. This is due to the period of time the site was marketed for prior to its disposal however other mitigating considerations have been taken into account as discussed above. It would therefore be necessary in assessing the overall acceptability of the proposal to apply the planning balance, weighing the benefits of the proposed development against identified harms, including limited harm relating to the lack of conformity with policy BS11.
36. Overall, the redevelopment of the site would make effective use of a long-term vacant and brownfield site in a sustainable location. There is an identified housing need across London and indeed the borough for all sizes and tenure of accommodation, but especially for affordable and family sized dwellings. As discussed in further detail below, the proposal would deliver on both aspects, also making a meaningful contributing to housing targets for London and Brent.

### **Housing need, mix of accommodation and affordable homes**

37. As referred to previously, London Plan Policy H1 sets out housing targets across London, with the target for Brent being 23, 250 new homes over the ten-year plan period. Brent's Local Plan Policy BH1 responds to this by proposing plan-led growth concentrated in Growth Areas and site allocations.
38. The proposed development would deliver a total of 108 new homes. This would deliver a significant quantum of new housing, making a meaningful contribution towards the Borough's housing need, increasing housing choice (through the different tenures and typologies proposed) and this responds well to the strategic housing targets for Brent, as set out in the Local Plan.

#### *Housing Mix:*

39. Overall, across all tenures, the proposed housing mix is set out below;

Unit type	Units	Units	Habitable Room No.	Habitable Room No.
	No. of	% of	No. of	% of
1 bedroom	28	26	56	17
2 bedrooms	54	50	162	50
3 bedrooms	26	24	104	33
<b>Total</b>	<b>108</b>	<b>100</b>	<b>322</b>	<b>100</b>

#### *Family Housing:*

40. Local Plan Policy BH6 (Housing size mix) sets out that 1 in 4 new homes should be family-sized dwellings (i.e. 3-beds or greater). Exceptions to the provision of family sized dwelling are allowed where the applicant can show that the location of the development would not be able to provide a high-quality family environment, or its inclusion would fundamentally undermine the development's delivery of other Local Plan policies.
41. The proposal would deliver a total of 26 family sized homes (3-bedroom), which represents 24% of all proposed dwellings. It would fall short by one home in meeting the 1 in 4 requirement set out within policy BH6. It is noted that a higher proportion of family sized units, 4 out of 11 (36%), are included within the affordable tenure, in recognition of the Borough's most acute housing needs.
42. Demonstration of near compliance with the BH6 policy target that 1 in 4 new homes should be family sized is a positive aspect of the proposed development and is supported in principle.

#### *Affordable Housing:*

43. London Plan affordable housing policy (Policies H4, H5 and H6) sets out the Mayor's commitment to delivering 'genuinely affordable' housing and requires the following split of affordable housing provision to

be applied to development proposals: a minimum of 30% low cost rented homes, allocated according to need and for Londoners on low incomes (Social Rent or London Affordable Rent); a minimum of 30% intermediate products; 40% to be determined by the borough based on identified need.

44. Policy H5 states that to satisfy the fast-track route, the development should be delivering a minimum of 50% affordable housing on-site as this involves the development of public sector land, and the proposal should be consistent with the relevant tenure split. Development which does not deliver these requirements would not be considered fast-track compliant and must follow the Viability Tested Route (VTR).
45. Brent Local Plan policy BH5 (Affordable housing) confirms that 70% of homes should be Social Rent or London Affordable Rent whilst 30% should be intermediate, thus confirming that the 40% set by the borough should be one of these low-cost rental products.
46. The proposed affordable housing offer is 11 dwellings, at London Affordable Rent (LAR) level. This comprises of 3 x 1-bedroom, 4 x 2-bedroom and 4 x 3-bedroom dwellings, all located within block A. This equates to affordable housing provision of 10% by unit (11 of 108), and 10.2% by habitable room (34 of 331), overall. As this level of affordable housing falls below the 50% threshold level (policy H5), this has been viability tested.
47. The Financial Viability Assessment (FVA) accompanying the application (November 2025) was viability tested both prior to and after the formal submission of the current application. Initially, the proposed affordable housing offer comprised of four affordable homes, equating to 3.7% of the total units and 2.9% by habitable room. The tenure split was a mix of three at LAR level and one shared ownership, delivering a greater proportion of low-cost rented affordable homes than required by Brent policy BH5. It was concluded by the applicant this affordable offer placed the scheme in a deficit when considered against the Benchmark Land Value (BLV), therefore it exceeds the maximum reasonable level of affordable housing contribution achievable for the proposed development excluding grant funding.
48. Prior to the submission of the current planning application (submitted in February 2026) viability consultants, BNP Paribas Real Estate (BNPPRE), were instructed by the Council to test the scheme viability and provide an independent assessment of the applicant's FVA, to determine whether the proposal could provide additional on-site affordable housing.
49. This first review by BNPPRE (December 2025) made some adjustments to inputs used in the applicants FVA, which consequently, identified that the proposed development could generate a surplus and that this could enable a greater number of affordable homes to be provided. It was therefore concluded, the applicants affordable housing offer to deliver four affordable homes on-site, could not be considered the maximum reasonable level.
50. Following this (in January 2026), the applicants subsequently agreed with several of assumptions made by BNPPRE in their December 2025 response, including in relation to, private sale values, shared ownership values, level of affordable housing profit on GDV, finance rates and BLV (agreed at £2.618m). Where there was still disagreement with BNPPRE's position was in relation to, developers return, LAR levels (£/psf) – *the applicant contended that rent levels were lower than BNPPRE had applied*, % of budget for sales agent fee and marketing and construction costs.
51. The table below illustrates the updated appraisal results and shows a surplus of £239, 102 against the agreed BLV for the provision of additional affordable homes above the four affordable homes initially proposed.

	<b>Fairview New Homes Original Viability Submission</b>	<b>Fairview New Homes Updated Viability Submission</b>
Residual Land Value	£2,120,515	£2,857,102
Agreed Benchmark Land Value	£2,618,000	£2,618,000
Surplus / Deficit	<b>-£497,485</b>	£239,102

52. The applicant subsequently increased the affordable housing offer to seven affordable homes, comprising five as LAR and two as Shared Ownership (SO). This, it was suggested, would result in a small deficit against the BLV, of -£61, 329.

53. BNPPRE undertook a further review (March 2026) of the applicants updated affordable housing offer (7 homes), noting the parties were still not agreed on several inputs and assumptions, including four key areas (developers return, LAR levels (£/psf), sales agent and marketing fee and construction costs). The results of this updated appraisal, based on provision of seven affordable homes (x5 LAR and x 2 SO), were that the proposed development would produce a Residual Land Value of £3.23m, which generates a surplus of £614, 375 when measured against the agreed BLV (£2.618m).
54. Considering the above, BNPPRE concluded that the applicant's updated offer of seven affordable homes, could not be considered to be the maximum viable amount of affordable housing supportable by the proposed development.
55. In a further response (March 2026), the applicants maintained their previously stated position in respect of developer's return and the £/psf values attributed to the LAR homes and disagreed with some of the inputs/conclusions within BNPPRE's updated report (March 2026). Notwithstanding this, on a without prejudice offer, the applicants accepted the overall conclusions of BNPPRE's appraisal report.
56. A revised affordable housing offer of 10 LAR homes was offered, which has subsequently been increased to 11 LAR homes (including an additional family sized home). This increased affordable offer now includes a greater proportion of family sized homes also, increasing this from nil to 36%, which is welcomed. Whilst the proposal does not provide a policy-compliant 70:30 tenure split within the affordable housing offer, all 11 affordable homes are proposed as London Affordable Rent, which is a low-cost tenure most closely aligned with Brent's identified housing needs. The scheme therefore exceeds the minimum policy expectation (70%) for low-cost rented homes and delivers genuinely affordable accommodation. This approach is considered acceptable in principle.
57. Quintic (formerly known as BNPPRE) confirm that this increased offer of 11 x LAR homes on a without prejudice basis, represents the maximum reasonable offer of affordable housing, and this generates a deficit of -£191, 110 when measured against the agreed BLV (£2.61m). The proposal should therefore, secure through s106 legal agreement, a breakeven GDV and cost position, with appropriate early and late-stage viability reviews (and ensure the deficit is recognised and properly accounted for in any subsequent reviews). Additionally, it should be noted that that the applicant has indicated they would continue to work with the GLA and a Registered Provider to increase the level of affordable housing post-planning permission, including the provision of social rent with the benefit of grant funding.
58. In conclusion, the 11 London Affordable Rent homes (accounting for 10.2% of habitable rooms) as proposed is considered to represent in excess of the maximum reasonable level of affordable housing on the site at this time and therefore accords with policy BH% of the Local Plan and policies H5 and H6 of the London Plan.
59. A section 106 agreement would be entered into to secure this affordable housing, and it shall also secure suitably timed viability reviews to ensure further affordable housing can be captured, if possible, within the development process.

**Design: layout, scale and appearance considerations (including heritage impacts)**

60. London Plan policy GG4 (Delivering the Homes Londoners Need) outlines how development must ensure that homes are delivered and how mixed, inclusive communities should be created with good quality homes that meet high standards of design.
61. London Plan policy D3 sets out a design-led approach to new development that responds positively to local context and optimises the site's capacity for growth by seeking development of the most appropriate form and land use.
62. Policy D4 encourages external design review at pre-submission stage, to which this development has been subject to, while policy D5 seeks inclusive design without disabling barriers.
63. Policy DMP1 of the Local Plan sets out the need for development proposals to be:
  - (a) of 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.
64. Brent policy BD1 seeks the highest quality of architectural and urban design. In delivering high quality

design, development proposals would be expected to show how they positively address all the relevant criteria within London Plan design policies and the Brent Design Guide SPD1.

#### *Layout:*

65. The site layout is arranged around new open spaces that are connected to the adjacent streets. Within this arrangement are two distinct building forms and scales. Firstly, low scale 3-storey houses concentrated to the eastern portion of the site respond to their immediate neighbouring residential context and help to provide a comfortable transition for the change in scale as you move from east to west through the site. A short terrace of three houses provides a direct frontage onto Chaplin Road. Secondly, a larger scale open perimeter block, ranging from 4 to 6 storeys defines the edges to the open spaces, and this occupies the central and western parts of the site.
66. The perimeter block is broken down into four distinct components, blocks A-D, each with its own defined entrance. Blocks A and B address Chaplin Road and would be set back from the road behind landscaping and existing mature trees which are being retained. Corner entrances have been incorporated into blocks B and C to provide maximum legibility from areas of public realm and good levels of passive surveillance are achieved across the site generally.
67. A new public pedestrian route (Fairview Walk) would serve as a core element of the site layout, which overall would improve permeability and access.
68. Access for vehicles would primarily be via the existing Fairview Avenue site access, with a new access proposed off Chaplin Road, but this is only to serve off-street parking for terrace of three houses. Pedestrian access would be gained from Chaplin Road and Fairview Avenue.
69. To the western site boundary a separation of 9m is maintained, to the northern boundary 7.8m and to the eastern boundary this separation ranges between 4m (flank wall to flank wall) and 10.5m.

#### *Secure by Design principles*

70. Policies D1-D3 and D8 of the London Plan and the Mayor's Housing SPG refer to the importance of designing out crime by applying principles such as optimising the permeability of sites, maximising active frontages and minimising inactive frontages. Areas of public realm should be well-designed, welcoming, inclusive and benefit from natural surveillance.
71. Policy DMP1 of the Local Plan seeks to ensure that developments are safe, secure and reduces the potential for crime.
72. The site layout does optimise permeability and maximises active frontages. Areas of public realm are well-designed and would benefit from good levels of natural surveillance as several homes front onto such areas.
73. The proposed layout has been informed by early engagement with Designing out Crime officers. General observations being that the scheme shows a good awareness of key security requirements, with the recommendation that Secure by Design certification should be pursued. A condition is recommended in relation to this.

#### *Public Realm*

74. At the heart of the development is Fairview Walk, a proposed new centrally located landscaped pedestrian route that would be publicly accessible, providing a direct connection between Chaplin Road and Fairview Avenue. This route would enhance permeability, provide the opportunity for active travel, and serves as an active frontage for the proposed homes that front onto it. Along the route would be opportunities for rest, play, landscaping and biodiversity enhancements. The benefits this route would bring about, including increased permeability is a public benefit of the proposed development and represents a significant betterment when compared to current site conditions.

#### *Height, scale and massing:*

75. The proposed development includes buildings up to 6-storeys in height concentrated in the northwestern corner of the site, this inverted C shaped perimeter block (A-D) steps down to part 5 storeys on the corners and has 4 storey linking elements to break the mass down further. This variation in height across

the block successfully helps break down the massing and to define the corners.

76. The semi-detached homes, and the terraced housing fronting Chaplin Road, are designed as three storey townhouses, in direct response to their immediate more suburban context (to the east). These homes have been designed with flat roofs, to reflect the architectural language and materiality displayed throughout the rest of the site. Shadow gaps break up the façade of the terrace, ensuring this is clearly read as three individual houses. The semi-detached homes are set back on the top floor, allowing for the provision of private roof terraces, which also further articulates the front facades, and breaks up the massing. Overall, the architectural approach relates well to the existing urban grain.
77. The overall massing strategy has been developed because of an iterative design process which also involved external design review. The proposals respond appropriately to the prevailing 2 storey detached / semi-detached houses along Chaplin Road to the south, east and west and the taller residential and civil blocks found to the north and northwest. The proposed arrangement of height and massing across the site is considered to be appropriate both in terms of townscape response and mitigation of adverse impacts.

*Appearance (materiality):*

78. SPD1 states that the use of durable and attractive materials is essential to create development that is appealing, robust and sustainable and fits in with local character. Developments should also have a clear base, middle, and top.
79. The proposed materials predominantly comprise of buildings with brick facades. The flatted blocks (A-D) feature the same red multi tonal brick detail through a continuation of protruding ribbed brickwork. White brick banding and top floor 'speckled' brick pattern further articulate the elevations. The four storey linking elements are treated in a white/grey multi tonal brick to contrast between the darker brick used on the rest of blocks A-D. The selected bricks (and mortar) have been agreed, in principle, subject to further review of mock-up wall panels on site and this shall be secured through condition. Windows, balustrades and metalwork is proposed to be finished in matching white to add lightness against the darker red brick, further details of which would also be secured through condition.
80. The appearance of the proposed scheme derives inspiration from the existing Metroland context and the Listed Wembley Fire Station, which is built in an art-deco style. This inspiration is particularly evident through the expression of the communal entrances to the flatted blocks (A-D), with their well-considered canopy design, generous postage areas, signage and horizontal banded fenestration. This approach is supported.
81. Materiality for the proposal has been well considered and distils the Metroland aesthetic references successfully. As referred to, relevant conditions are recommended secure the approval of final materials/architectural details, to ensure a high-quality design is delivered.
82. Overall, it is considered the proposal represents an appropriate response to its context, that is well-considered in terms of site layout, height, massing and displays high quality design. The design is supported by a well-chosen, yet relatively simple palette of materials appropriate for the locality and an appropriate level of architectural detailing is evident. This would represent an overall enhancement compared to the existing buildings on site. The proposals are supported in urban design terms and respond well to Local Plan policy BD1.

## HERITAGE EFFECTS

*Demolition of existing buildings and heritage impact:*

83. Where any development may have a direct or indirect effect on designated heritage assets, there is a legislative framework to ensure the proposals are considered with due regard for their impact on the historic environment.
84. Primary legislation under Section 66 (1) of the Planning (Listed Buildings and Conservation Areas Act) 1990, relates to buildings that have statutory listing status, and conservation areas.
85. 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 would be required to allow consideration of whether the replacement would contribute positively to the character or would 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 would be applied to ensure construction of the approved scheme is implemented together with agreed mitigation measures.

86. 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 [...]"*

87. Non-designated heritage assets can be identified in several ways, including:

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

88. Paragraph 202 of the NPPF recognises that heritage assets are an irreplaceable resource and seeks to conserve them in a manner appropriate significance. It is appropriate to consider the desirability of new development making a positive contribution to the local character and distinctiveness. This is reflected in Local Plan Policy BHC1.

89. 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.

90. Paragraph 208 of the NPPF states that:

*"Local planning authorities should identify and assess the particular significance of any heritage asset that maybe 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."*

91. 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 would be required having regard to the scale of any harm or loss and the significance of the heritage asset.

92. 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.”*

93. The assessment of the nature and extent of harm to a designated heritage asset is a matter for the planning judgement of the decision-maker, looking at the facts of a particular case and taking into account the importance of the asset in question.

*Statutory listed heritage assets:*

94. There are four designated listed heritage assets within c.500m of the site, including Wembley Fire Station (Grade II) which is located closest to the application site. Due to a lack of intervisibility between the site and these assets, as well as their disassociated history, the site is considered to not form part of the setting of these assets. Therefore, the subject of the submitted Heritage Statement remains the Old Wembley Hospital, which is considered proportionate.

*Significance of the non-designated heritage asset:*

95. The Old Wembley Hospital originated in the mid-1920's, following a public health initiative to establish a local facility. Titus Barham, the owner of Express Dairy Company and occupant of Sudbury Park, provided the land along Chaplin Road as the site for the new hospital. The hospital opened in 1928.
96. The hospital began as a modest 24-bed unit, it underwent expansion in 1932, and further expansion in 1938. It was adapted for use during the Second World War, and it was further expanded after the war. In 1948 the hospital was integrated into the NHS. Further extensions were constructed in the 1950's. In 1974 the hospital came under the control of (the then) Brent District Health Authority. By 1983 it had become a community hospital and in 1997 the community centre building was constructed immediately to the west of the site. In 2000, a new facility, the Wembley Centre for Health and Care, was opened on an adjacent part of the site.
97. The Old Wembley Hospital (main building) is considered to have architectural interest, with the most expressive part being the northern buildings, built in the Queen Anne Revival / Neo Georgian style, and there are various local historic associations with the buildings on site. Other buildings within the site are plainer and more functional. A functional approach to design and architecture was often adopted, and this was also the approach taken at other hospitals of a similar date and scale. During this period mass hospital construction was delivered to tight budgets.
98. As evidenced above, the buildings within the site have been subject to significant change over time, and the wider estate has seen multiple phases of development. Resulting in a complex of buildings that have seen its significance reduced over time.
99. The buildings are not locally listed, however, the Old Wembley Hospital was identified early in the planning process as a non-designated heritage asset (NDHA). That said, the buildings are not subject to any additional planning controls over demolition or alteration. The NDHA status also does not impact on the owners Permitted development rights (including seeking Prior Approval for demolition). These are relevant material considerations in weighing up the proposals, including the weight that can be given to the buildings as heritage assets.
100. A desk-based assessment of the Old Wembley Hospital against the Council's 'Local Listing Eligibility Criteria' (2015), which forms part of the submitted Heritage Statement, concludes that the buildings fall short of eligibility for inclusion in the Local List and it is the applicants view that the existing buildings do not possess sufficient significance to be regarded as NDHA's. Whilst this viewpoint is not challenged, the Council's Heritage and Conservation Officer does consider the buildings qualify as NDHA's (possessing some significance).

*Assessment of effects against benefits of the proposed scheme*

101. As previously discussed, the proposal does not have any effect on buildings that are statutory listed, nor does it result in effects on any conservation area. However, the proposals would involve the demolition of the existing buildings and the total loss of the NDHA. In accordance with the Framework (paragraph 216) it requires the decision-maker to arrive at a balanced judgement, having regard to the scale of any harm or loss and the significance of the heritage asset. Any harm should be weighed against the public benefits of the proposal.

102. Several public benefits of the proposal can be identified, including delivery of a significant number of

new homes (including the maximum reasonable provision of affordable homes), which are set out in further detail in the below 'Planning balance' section and throughout the report. These public benefits can act as justification for the demolition of this NDHA and in this case help to meet the requirements of paragraph 216 of the NPPF, which states that, "a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."

103. The Council's Heritage and Conservation Officer, having considered the proposals, including the submitted Heritage Statement, the effects on the NDHA and the range of public benefits that would follow as a result of development taking place, finds that the requirements of paragraph 216 of the NPPF would be met.
104. A Written Scheme of Investigation (WSI) for Historic Building Recording, in relation to the NDHA has been submitted. This is accompanied by a Level 2 historic building recording which has been undertaken, including photographic record survey and descriptive recording of the NDHA. The requirement for this recording is consistent with the approach agreed for related planning permission 25/3046, which upon implementation would also involve part demolition of the existing NDHA on site. On review of the aforementioned documents, the Council's Principal Heritage Officer is satisfied with the scope of both the WSI and the Level 2 recording undertaken. The recording survey can be added to the Council's Historic Environment Record.
105. Additionally, it is recommended that that an interpretation panel and/or plaque be placed on site to explain the former role the hospital played in the community (including its founding via a local charity and its use during the Second World War). This would also be secured via an appropriately worded condition.
106. When read in conjunction with other relevant sections of this report, the proposals would accord with relevant paragraphs of the Framework, including 203 and 216, and policies BHC1 of the Local Plan and HC1 of the London Plan. Overall, the harm/total loss of the NDHA could be overcome by public benefits delivered on the site. It is important the lost buildings, which played an important role in the area's history, is recorded.

#### *Archaeology:*

107. In consultation with the Greater London Archaeological Advisory Service (GLAAS), which gives advice on archaeology, the Council is advised that the site is not in an Archaeological Priority Area. The potential for significant archaeological remains on the site is low and the construction of the hospital would have significantly impact any surviving evidence. No further assessment or planning conditions are found to be necessary.

#### **Quality of proposed residential accommodation**

108. To improve the quality of new housing, new development must meet with or exceed the minimum internal National Design Space Standards contained within the London Plan policy D6 (table 3.1) and the Mayor's Housing Design Standards LPG. It goes on to say that all new homes should be provided with adequate levels of outlook, daylight and natural ventilation. Local Plan policies DMP1 and BH13 confirm that dwellings need to meet the private internal space standards set out in policy D6. Additionally, the proposal should also have regard to and comply with guidance contained within Brent Design Guide SPD1.
109. In accordance with policy D6, all the homes proposed would meet and, in some cases, exceed the minimum space standards, provide adequate room sizes, storage space, and each home has access to private balconies/external space that comply with minimum standards. With respect to floor to ceiling heights, the residential minimum standard is 2.5m for at least 75% of the GIA and the floor to ceiling heights across the proposed development would satisfy this requirement of policy D6.
110. Adopted policies and guidance seek to maximise dual aspect dwellings within a development, although recognising that single aspect dwellings may need to be provided when it is considered a more appropriate design response when trying to meet with the requirements for optimising site capacity (London Plan Policy D3) providing that adequate passive ventilation, daylight, privacy, and overheating avoidance can be demonstrated.
111. The proposed development has sought to maximise the number of dual aspect homes throughout, with a total of 79% dual aspect units. Those single aspect units benefit from generous openings to ensure good levels of light, ensuring that the proposed development does not include any single aspect north facing units, meeting the aspirations of both the London Plan Policy D6 and Brent's Design Guide SPD.

Overall, this is considered to represent a high proportion of dual aspect homes to be provided within a development, such as this, and the overall residential layout is considered acceptable in this regard.

112. Except for a single dwelling in block D and the Chaplin Road terrace (units 106-108), all dwellings at ground floor front onto either Fairview Walk, the private courtyard or areas open space/public realm. This would ensure a pleasant outlook and aspect for future residents, and all dwellings would receive good overall daylight levels and be appropriately ventilated.
113. Internally, the layouts are well planned and present a range of typologies (of differing sizes) that would support different ways of living for a range of different residents. Access to private amenity space is provided directly from kitchen / living / dining areas in all dwellings.
114. The dwellings have been proposed to be tenure blind in respect of materials, design and amenity provision. All affordable homes are located within block A.
115. Overall, the proposed dwellings would achieve comfortable and functional layouts which are fit for purpose and would meet the needs of future occupiers, in accordance with London Plan policy D6.

#### *Inclusive access and wheelchair accessible housing*

116. The proposed development has been designed to ensure inclusive, equitable access throughout. All buildings provide level approaches at every threshold, including private balconies and terraces. All new corridors, doorways and lobbies would comply with Approved Document M and K, and three on-site Blue Badge parking spaces are provided. The wider public realm and open spaces across the site are fully accessible.
117. London Plan policy D7 requires proposals to provide suitable housing and choice to cater for London's diverse population. In line with policy, 90% of the dwellings (97) would be designed to meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings', and 10% of the dwellings (11) would be designed to meet Building Regulation requirement M4(3) 'wheelchair user dwellings'. M4(3) wheelchair user dwellings would be distributed predominantly at ground floor, and across tenures. The proposals are suitably in line with policy D7.

#### *Privacy between new homes within the development and outlook*

118. It is considered privacy would not be compromised for future occupants, owing to the separation distances provided between the proposed buildings (as well as to existing neighbouring residential properties), which complies with SPD1 guidance, even exceeding 18m separation in some situations. Where the separation between block B and the Chaplin Road terrace pinches to 14.7m this is into a flank elevation, and across Fairview Walk, so on balance is acceptable. Offset distances of +9m are achieved to the eastern boundary, 8-10m to the northern boundary and 9m to the western boundary, to accord with SPD1.
119. Outlook from residential units would also be of an acceptable quality, owing to the layout of buildings, and the good levels of separation achieved across the site. As discussed elsewhere within this report, a high proportion of dwellings (79%) would be dual aspect.

#### *Daylight and sunlight conditions for future occupiers within the proposed development*

121. The application has been accompanied by a Daylight and Sunlight Report (December 2025) and this assessment has been undertaken in accordance with the current updated BRE guidance (2022). The assessment considers the quality of daylight and sunlight amenity within the proposed development itself (i.e. for future occupiers).
122. The assessment undertaken has considered all proposed residential units within the development. The daylight assessment considers all habitable rooms (bedrooms, living rooms and kitchens), toilets, hallways and staircases are not considered habitable, and therefore have not been assessed.
123. The results of the internal daylight assessments show that of the 339 proposed habitable rooms tested, 312 (92%) either meet or exceed the BRE recommendations. This is considered an excellent level of compliance under the BRE 2022 guidelines for a relatively dense form of development such as this in an urban location.

124. Of the deviations, approximately half (13) fall within a modest tolerance of 25% from the target levels and are considered unlikely to significantly affect amenity conditions within the units. The deviations arise from a combination of factors, including the following design features; balconies / overhangs and some generously sized L/K/D rooms which have reduced daylight penetration owing to their depth and window position. Maximising the provision of balconies is beneficial though as this ensures private amenity space provision for all homes within the development, and they also help give protection from overheating to dwellings located below. The 27 rooms that are non-compliant with BRE daylight recommendations are dispersed across the site, with these concentrated along the eastern part of the site (the townhouses) and lower level dwellings across all blocks A-D, but block C in particular, which experiences a higher concentration of non-compliance. The high proportion of dual aspect units (79%) is also important to note in this context.
125. Site optimisation is encouraged in an accessible location such as this, and a degree of flexibility should be applied when considering the amenity levels in line with BRE recommendations. For a scheme of this scale and nature it is inevitable some deviations would be experienced, in this case these deviations are limited. Overall, the level of compliance is found to be high.
126. For sunlight to the proposed accommodation, the target is for a room, preferably a living space, to receive at least 1.5 hours of direct sunlight on the 21<sup>st</sup> March.
127. The provision of sunlight to the proposed amenity spaces / shared communal areas across the development has been assessed using the BRE's 2-hour sun on-ground (sunlight amenity) assessment.
128. The guidance suggests that, for a space to appear well-sunlit throughout the year, at least 50% of its area should receive two or more hours of sunlight on the 21<sup>st</sup> March.
129. The results of the sunlight / overshadowing analysis show that 8 of the 11 amenity spaces proposed across the site would comfortably exceed the BRE recommendations of receiving at least 2 hours of direct sunlight on the 21<sup>st</sup> March. This includes all the shared/communal areas. Those areas falling short of the BRE recommendations in March are private gardens to the south-east (serving the Chaplin Road terrace, units 106, 107 and 108). It is important to note that these three gardens are to the north of the terrace, where lower sunlight levels are to be expected. Additionally, a supplementary study on the 21<sup>st</sup> June shows that all the gardens would exceed the targets during the summer when the gardens are likely to be used the most / during the 'warmer months'.
130. On balance, the high level of compliance demonstrated in respect of daylight illuminance results indicates daylight levels to the majority of rooms tested would be BRE compliant. Deviations do occur however, as set out above, this is to be expected in a development of this density and scale, in an already built-up urban context, and such deviations must be weighed against the public benefits in the overall planning balance.

#### *Amenity and play space provision*

131. 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 would normally be expected to be 50sqm for family housing (homes with 3 or more bedrooms) at ground floor level and 20sqm for all other housing.
132. The requirement for external private amenity space established through policy BH13 is for it to be of a "sufficient size and type". This may be achieved even when the "normal expectation" of 20 or 50sqm of private space per dwelling is not provided. The supporting text to the policy clarifies that where "sufficient private amenity space cannot be achieved to meet the full requirement of the policy, the remainder should be applied in the form of communal amenity space". Proximity and accessibility to nearby public open space may also be considered when evaluating whether the amenity space offer within a development is "sufficient", even where a shortfall exists in private and/or communal space on site.
133. With regard to quality of the space, the supporting text to policy BH13 specifies that private amenity should be accessible from a main living room without level changes and planned within a building to take a maximum advantage of daylight and sunlight, whilst Brent SPD1 specifies that the minimum depth and width of the space should be 1.5m. The proposed development complies with these requirements.
134. Policy D6 of the London Plan specifies that where there is no higher local standard, a minimum of 5sqm

of private amenity space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant. The minimum depth and width of 1.5m is reconfirmed in the policy.

135. In line with policy BH13, the scheme would be required to provide a total of 2, 940sqm private external amenity space for residents. Nine of the 26 family sized dwellings would benefit from private rear gardens ranging in size, from 50sqm – 199sqm, which is in accordance with, and in some cases exceeds policy. All ground floor dwellings would have private terraces, and all dwellings on the upper floors would have private balconies that meet or exceed London Plan policy D6 minimum standards. Private residential amenity space would be supplemented through the provision of a large area of communal amenity space in the form of the courtyard space for residents in blocks A-D. The amenity space breakdown for the proposed development overall is as follows;

- 1, 340sqm in the form of private gardens, terraces or balconies
- 844sqm as communal amenity space (for blocks A-D)
- 768sqm privately owned public space (including Fairview Walk)

136. Whilst all dwellings would have direct access to private amenity space in some form and noting that all nine townhouses have gardens that meet, or exceed the policy target of 50sqm, the overall level of provision of private amenity is short of the target 20 / 50sqm quantum's set out in policy BH13, which in this case equates to a shortfall of c.1, 600sqm private amenity space. Mitigation is provided through the provision of a significant area of communal amenity (844sqm), which is private for residents in blocks A-D, plus the high quality privately owned but publicly accessible communal spaces (768sqm) distributed across the site. Both of which would play a beneficial role in mitigating the shortfall in private amenity space identified against policy BH13 targets.

137. Brent's Residential Amenity Space Place Quality SPD (ASPQ SPD) acknowledges that in some locations, meeting the overall minimum required might be challenging. As such, flexibility could be allowed where it has been shown that all reasonable options for provision have been considered, and that an overall high quality of amenity space is to be provided, which is considered to be the case in respect of the proposed landscape, public realm and amenity space elements of the proposed development. The application is supported by an Amenity Space Quality Statement (ASQS) and relevant supporting material. This sets out how the development would respond to the specific user needs, and measures the development against specific health and wellbeing, community and belonging, vibrant and inclusive and sustainability objectives. Upon review of the submitted documents in line with Section 8.3 of the ASPQ SPD, a score of 'good' has been awarded for the quality of the amenity space offer overall. The submission demonstrates a design response that has met the requirement for high quality design and quality of life.

138. Whilst the proposal experiences a shortfall in private amenity space against the target levels set out in policy BH13 and the ASPQ SPD, on balance, officers consider the proposed external amenity space offer would be of a sufficient size and type to serve the development and would also be of a good quality, whilst offering a variety of different types of external amenity space which would be to the benefit of future residents, including opportunities for social interaction, therefore meeting the requirements of policy BH13 of the Local Plan and the ASPQ SPD.

#### *Play space provision*

139. London Plan Policy S4 requires development proposals to make provisions for play and informal recreation based on the expected child population generated by the scheme. Further detail is provided in the Mayor's 'Shaping Neighbourhoods: Play and Information Recreation' Supplementary Planning Guidance (SPG), which sets a benchmark of 10sqm of usable child place space to be provided per child and makes clear that play space must not be segregated by tenure.

140. Based on the total expected child yield for the proposed development, 509sqm of play space is required on site. This is broken down as follows:

- 237sqm required for ages 0-4
- 172sqm required for ages 5-11

- 100sqm required for ages 12+

141. Play space would be dispersed across the site, which incorporates doorstep playable space and play-on-the-way, offering a range of small playful landscape features for younger aged children close to the dwellings and well-integrated with the landscape. All doorstep play (for ages 0-4) would be within sight of residences which is good in terms of safety and surveillance. The courtyard for blocks A-D provides the opportunity for more significant play features that are easily accessible for residents, well overlooked and safe for users.
142. The proposed play strategy would deliver 237sqm of play for ages 0-4 and 172sqm of play for ages 5-11, in accordance with the required amounts for each age group.
143. This level of play provision overall is below the 509sqm benchmark requirement, as per the GLA's population yield calculator. Due to space constraints, it is not possible to provide on site play space for the 12+ age group, which would typically be expected to be provided in the form of larger areas suitable for outdoor sports (i.e. basketball), and kickabout space. However, it is anticipated that Barham Park, which is within walking distance would in part help to meet this provision. If this requirement were to be met in full on site, then this would require significant alterations to the site layout and an inevitable reduction to buildings footprints and the quantum of development (including the number of new homes and affordable homes). The Borough's acute housing needs are such that maximising housing delivery is prioritised over on site play features.
144. To mitigate the shortfall in on site play features for the 12+ age range a financial contribution is to be secured through s106 legal agreement, which is to be spent on improvements to nearby open spaces which may include improvements to the open spaces themselves and/or the play facilities within these open spaces. The applicant is agreeable to this, in principle. Barham Park and Butlers Green are the closest open spaces to the site, and this contribution would enable improvements to be delivered to existing open space for the public benefit of the local area.
145. On balance, the play space strategy is considered to be acceptable, and further details of on site play features would be secured through relevant condition(s).
146. On the quality of accommodation overall, the proposed development delivers a good standard of residential quality in line with Policy BH13 of the Brent Local Plan, London Plan policy, the London Plan's Housing Quality Standards, and Brent's ASQS SPD. All units meet or exceed the nationally described space standards, with layouts that provide functional, well-proportioned rooms and adequate storage. A high proportion of dual aspect provision (79% of homes) and appropriate floor-to-ceiling heights ensure good levels of daylight and ventilation, while private and communal amenity spaces contribute to residents' health and wellbeing. Although there is a shortfall in play provision for the 12+ age range, this deficiency is to be mitigated by a contribution towards enhancing open space / play provision off-site, in the locality. On balance, the scheme can be expected to achieve a good standard of living conditions for future residents and is considered acceptable.

### **Fire safety**

147. As set out in London Plan Policy D12, all major development proposals, in the interests of fire safety and to ensure the safety of all building uses, must achieve the highest standards of fire safety. Furthermore, all major development proposals should be accompanied by a Fire Statement, which is an independent fire strategy produced by a third party suitably qualified assessor, to demonstrate how fire safety has been embedded into the design of the development.
148. An Outline Fire Safety Strategy (December 2025) has been prepared by Ashton Fire to support the application. The document sets out the proposed fire safety strategy for the development, having regard to the Building Regulations 2010 (as amended) and relevant British Standards.
149. The strategy addresses key fire safety matters and policy D12, including means of warning and escape, fire spread, active and passive fire safety systems, and access and facilities for the fire and rescue service.
150. A defend in place strategy is proposed for the apartment buildings (blocks A-D), so that only the flat where the fire originates would receive a signal to evacuate, with a simultaneous evacuation strategy for the houses and ancillary areas. The development incorporates protected stairs, evacuation lifts, smoke

ventilation systems, fire detection and alarm systems, sprinkler provision within the apartment buildings, and appropriate levels of fire resistance and compartmentation. As the proposed development would have a top storey height less than 18m, separate firefighting stairs are not required.

151. In accordance with Policy D5 (Inclusive Design) of the London Plan, safe and dignified emergency evacuation is required to be incorporated into blocks A-D for all building users. As this building has a passenger lift installed, the policy stipulates that the lift should be suitably sized for evacuation. It is stated in the submitted Strategy the evacuation lifts provided would be as per policy D5 and the recommendations of BS 9991.
152. Provision is also made for fire service access, including access via surrounding roads, dry rising mains and appropriate hose distances within the site as demonstrated in the Outline Fire Safety Strategy submitted.
153. The proposed approach is therefore considered acceptable, for planning purposes, in relation to fire safety considerations and it demonstrates that the development achieves an appropriate standard of fire safety, in accordance with the requirements of London Plan Policy D12 at this stage. Additionally, the proposal aligns with the objectives of Local Plan policy DMP1, which seeks to ensure that development provides for the safety and wellbeing of occupants and users through appropriate design measures. Full compliance with fire safety standards would be subject to further detailed design and assessment at Building Regulations stage.

### **Relationship with neighbouring sites and assessment of amenity impacts**

154. One of the core planning principles in the NPPF is that decisions should “*always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings*”. London Plan Policy D6 states that the design of development should 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.
155. In accordance with Local Plan Policy DMP1, any development would need to maintain adequate levels of privacy and amenity for existing residential properties, in line with the guidance set out in Brent’s SPD1. SPD1 recommends that to ensure a good level of privacy inside buildings and within private outdoor space, a minimum separation distance of 18m between directly facing habitable room windows should normally be required. Exceptions to this might be where the existing character of the area varies from this, or these are street facing windows. The guidance also recommends a 9m separation distance should be kept between gardens and habitable rooms or balconies. Reduced distances between new frontages may be acceptable subject to considerations of overlooking and privacy, in addition to high quality design solutions that mitigate impacts and allow for efficient use of land. These standards are also applied to help ensure development does not compromise the potential future redevelopment of adjoining sites.
156. Development should ensure a good level of daylight, sunlight and outlook, throughout the day and the year and minimise the impact on surrounding properties and spaces. Guidance published by BRE titled, ‘*Site Layout planning for daylight and sunlight: a guide to good practice*’ is a relevant consideration in this regard.
157. To ensure new development has an appropriate relationship with existing properties and spaces, it is recommended in SPD1 that new buildings should sit below a 30-degree line from the nearest rear habitable room window of an adjoining existing property, measured from a height of two metres 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 two metres.
158. Relevant guidance should be balanced against the policy objectives of London Plan policy D3 which sets out that site capacity should be optimised through the design-led approach.

#### *Separation distances and privacy:*

159. Well in excess of 18m separation is to be maintained between the direct facing habitable windows proposed facing onto Chaplin Road, and those existing dwellings on the opposite side of the street. To the north of the site, a separation ranging between 8.2m to 9.9m is maintained to the site boundary, which is to an adjacent NHS staff parking area. The closest existing residential properties to the north, on

Turner Close, are approximately 28m away and in any event the proposed habitable windows would face towards a flank elevation on Turner Close. To the western site boundary c.9m separation is maintained to the adjacent WCfH site, which is an acceptable relationship as the western facing elevations would not be directed towards any habitable windows.

160. No.15 Fairview Avenue, located to the east of the site, is a two-storey pitched roof detached dwelling located in close proximity to the shared eastern site boundary. The existing boundary conditions consist of a typical 1.8m close boarded fence with established planting. The internal layout of No.15 results in its kitchen window being located on its western flank elevation, with two further secondary (high level) windows within this elevation at ground floor that serve a reception/living room. Within the western flank elevation at first floor is an obscure window serving a bathroom. The habitable kitchen window faces towards the existing 1.8m boundary fence (and car parking area beyond). As a result of No.15's particular internal configuration and the dwellings proximity to the shared boundary, this window relies on this neighbouring site (the application site) for outlook from its kitchen. As a result of the proposed development the existing kitchen window at No.15 would directly face towards rear habitable room windows at ground, first and second floors to the proposed dwelling labelled as 101 on the proposed plans, however a separation of c.10.8m would be maintained. A broadly similar relationship (albeit a more oblique one) to the rear elevation habitable windows serving dwellings 100 and 102 would also exist. This relationship, and in particular with dwelling 101, falls below the recommended separation distance of 18m between directly facing habitable room windows normally required by SPD1.
161. However, notwithstanding this, the garden depth to the proposed dwellings labelled as units 100-102 ensures that a separation distance of 9m is to be maintained between gardens and habitable rooms, which is on balance considered to be acceptable, and would align with SPD1 recommendations.
162. The proposed site layout demonstrates a high level of compliance with the guidance contained within SPD1, with only limited and localised departures occurring in one part of the site. In assessing these instances, it is important to recognise that some degree of conflict with the guideline standards contained within SPD1 can arise where development is seeking to make efficient use of previously developed land within an urban area, particularly on allocated housing sites where increased densities are anticipated through the development plan.
163. The guidance within SPD1 is not intended to be applied mechanistically and must be considered alongside the wider objectives of the development plan, including the optimisation of site capacity and delivery of much-needed housing.
164. In this case, whilst there are isolated departures from the SPD1 recommendations, these would not result in unacceptable harm to residential amenity. It is also noted that a boundary treatment of up to 2 metres in height could be erected along the shared boundary under permitted development rights without the need for planning permission. Such a boundary treatment would materially limit intervisibility between neighbouring properties and the proposed development. This is a relevant material consideration when assessing the practical implications of the proposal and the degree of any resulting harm. On balance, the identified departures from SPD1 are limited and are outweighed by the wider benefits associated with the comprehensive redevelopment of this allocated housing site and the delivery of new homes.

*Outlook, daylight, sense of enclosure:*

165. In the interests of ensuring that proposed development does not harm amenity to existing surrounding properties, SPD1 recommends for new development to be set below a line of 30 degrees from the nearest rear habitable room window of adjoining existing property, measured from height of two metres 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 two metres.
166. In relation to both the 30 and the 45-degree line test, the scale of blocks A-D are compliant with SPD1.
167. In relation to No. 15 Fairview Avenue, the proposed dwellings on the eastern side of the site would be located more than 10m from the neighbouring property. When assessed from the flank kitchen window, the proposal would result in a very limited breach of the 30-degree guideline. However, SPD1 makes clear that the test is intended to be applied to the nearest rear habitable room window of an adjoining property. The window in question is located within the west-facing flank elevation and is therefore not the

type of window to which the guidance is directed. Consequently, there is no technical conflict with the 30-degree guidance in this regard.

168. Notwithstanding this, even if the test were applied to the flank window, the degree of breach would be very minor in nature and would not indicate a materially harmful impact on outlook or daylight to the neighbouring property. The proposed dwellings are relatively modest in scale, are set away from the shared boundary, and benefit from a sufficient separation distance to mitigate any adverse effects. Furthermore, the proposal complies with the 45-degree test when measured from the garden edge of No. 15 Fairview Avenue. Taking these factors together, the proposal is considered to have an acceptable impact on the amenity of this neighbouring property.
169. In relation to No. 76 Chaplin Road, which comprises five self-contained flats, the proposed terrace fronting Chaplin Road would breach the 30-degree guideline when measured from existing ground floor flank windows. However, these windows are located within the side elevation of the building rather than serving as rear-facing habitable room windows, which is the circumstance to which the SPD1 guidance is principally directed. Furthermore, the existing ambulance station already breaches this guideline in relation to the same windows. As such, the proposal would not materially worsen the existing relationship, and no significant harm is considered likely to arise.
170. In respect of the 45-degree test, whilst the proposed terrace would technically breach the guideline when measured from the garden edge, the terrace remains broadly aligned with the footprint of No. 76 and does not project significantly beyond its rear building line. Consequently, the proposal would not result in an undue sense of enclosure or materially reduce the usability of the neighbouring amenity space. Taking these factors together, the identified departures from the SPD1 guidelines are limited and would not result in unacceptable harm to the living conditions of occupiers at No. 76 Chaplin Road. On balance, the relationship is considered acceptable.

#### *Daylight and Sunlight assessment for nearby sensitive receptors*

171. Policy D6 (part D) of the 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.
172. Where buildings would be within a 25-degree line of existing windows, the Building Research Establishment (BRE) 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. This guidance supersedes the 2011 version, however the advice in relation to assessing the impact on neighbouring properties remains consistent with the earlier version.
173. In support of the application a Daylight and Sunlight Report, ref: 6895 (December 2025) has been submitted, which assesses the effect of the proposed development on existing surrounding properties as well as within the proposal itself (discussed within the 'Quality of proposed residential accommodation' section above). All assessments have been undertaken in accordance with the above referenced 2022 BRE guidance.
174. In terms of impacts on daylight and sunlight to neighbouring properties, BRE guidance recommends two measures for daylight. Firstly, the Vertical Sky Component (VSC) assesses the proportion of visible sky and is measured from a specific point on the outside of a property - the centre of the main window – and is directly related to the amount of daylight that can be received. BRE guidance suggests that existing daylight may be noticeably affected by new development if windows achieve a VSC below 27% and are reduced to less than 0.80 times their former value. Neighbouring residents are unlikely to notice a difference in the level of daylight if windows achieve a VSC of more than 27%.
175. In addition, existing daylight may be affected if levels of No-Skyline (NSL) within rooms are reduced to less than 0.80 times their former values. The NSL test calculates the distribution of daylight within rooms by determining the area of room at desk / work surface height which can and cannot receive a direct view of the sky. The working plane surface height is set at 850mm above floor level within a residential property.
176. For sunlight, the Annual Probable Sunlight Hours (APSH) test is recommended, which calculates the percentage of probable hours of sunlight received by a window or room over the course of a year. In

assessing sunlight effects to existing properties surrounding a new development, only those windows orientated within 90 degrees of due south, and which overlook the site require assessment.

177. For neighbouring buildings, the guide suggests that occupiers would likely notice the loss of sunlight if the APSH to affected windows/rooms falls below 25% annually (including at least 5% during winter) and that the amount of sunlight (i.e. the resulting APSH), following the proposed development, is reduced to less than 0.80 times (80%) of its former value.
178. The impact to overshadowing and the provision of sunlight to open spaces is assessed using the Sunlight Amenity test. This test quantifies the proportion of an open space that receives at least two hours of direct sunlight on the 21<sup>st</sup> March. For an open space to be considered well sunlit throughout the year, the BRE guide suggests that at least 50% should receive two hours of direct sunlight on 21<sup>st</sup> March.
179. However, the BRE also recognise that different criteria 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 the NPPF also supports a flexible approach to applying standards to make most efficient use of sites. Where existing buildings have windows close to the site boundaries, the BRE suggests that a new building of similar height and proportions could be assumed to derive 'mirror image' target values for VSC. Where the proposed development would affect other newly consented developments, the impact on the Average Daylight Factor (ADF) achieved for those developments can also be used as an alternative means of assessing the impact of the proposed development.
180. The BRE guidelines advise that, when assessing any potential effects on surrounding properties, only those windows and rooms that have a 'reasonable expectation' of daylight and sunlight need to be considered. At paragraph 2.2.2 it states windows to living rooms, kitchens and bedrooms need to be analysed. The assessment undertaken therefore does not analyse impacts on other types of rooms within neighbouring dwellings, including any associated outbuildings, as per BRE guidance.
181. Officers are satisfied that the assessment successfully identifies all existing neighbouring properties with windows overlooking the site, which could potentially be affected by the proposed development, which are as follows:
- 4-5 Turner Close (to the north)
  - 6-26 Turner Close (to the north)
  - 1 Harley Close (to the north/north-east)
  - 15 Fairview Avenue (to the east)
  - 76 Chaplin Road (to the east)
  - 5-8 Chaplin Road (to the south)
  - 85-91 Chaplin Road (to the south)
  - 93-99 Chaplin Road (to the south)
182. Results of the assessment show that the following neighbouring properties would experience no noticeable change in daylight or sunlight levels where they retain VSC, NSL and APSH levels in line with BRE recommendations:
- 1 Harley Close
  - 4-5 Turner Close
  - 6-26 Turner Close
  - 93-99 Chaplin Road
- 5-8 Chaplin Road*
183. These properties are located south of the application site, on the opposite side of Chaplin Road, and have windows (including habitable windows) within the northern elevation facing the site. As the windows to these properties are not orientated within 90 degrees of due south, they would not be relevant for sunlight testing under BRE guidance, so only potential daylight effects have been considered.
184. VSC daylight results show that these windows would either meet the BRE target retaining 0.80 times their former value or are limited to very minor transgressions from the recommendations between 0.74-0.79.
185. These windows currently experience high levels of skylight, recording VSCs of c.30%. this prevailing

condition exacerbates the percentage reductions expected at these properties. Absolute retained VSC levels are shown to be more than c.22%, indicating good levels of amenity would be maintained with development in place.

186. The NSL assessments show limited change in daylight penetration, with all rooms comfortably retaining at least 0.80 times their existing level.
187. Overall, the effects on daylight to these properties would be limited, and the principal living areas and bedrooms face away from the site and so would be unaffected by the development.

#### *76 Chaplin Road*

188. Principal elevations face away from the site and would therefore be limited to oblique views of the proposed development. There are however windows to the side elevation situated close to the shared boundary. Where windows are located very close to the shared boundary, like this, in such circumstances, the BRE guidance allows for alternative targets to be set to those of a 'mirror image' of the neighbouring building. The assessment has therefore considered the effects to this property based on the existing baseline condition but also a 'mirrored' baseline condition in accordance with the BRE guidance.
189. VSC daylight results show that two windows facing the site would fall below the target level, and these are isolated to a dual aspect bedroom served by two windows (the window (W9) on the flank elevation is not the only source of light to this room), and a small single aspect kitchen at ground level (W14). It is reasonable to assume the kitchen, by virtue of its size, c.6-7sqm, would inevitably be occupied more transiently.
190. When considering the absolute retained VSC levels to this kitchen, the window achieves a VSC of 15% under the proposed condition which is considered reasonably good for a flank wall elevation where relationships are typically closer.
191. The NSL assessment results show that all but one of the rooms records no noticeable loss of daylight distribution, in compliance with BRE recommendations. The single aspect kitchen (W14) deviates from the guidance, retaining 0.68 its existing level of daylight penetration, meaning 62% of the area would continue to receive daylight penetrations levels in line with BRE guidance.
192. A mirrored baseline study has been carried out, as per the BRE guidance, given the existing context which places windows close to the shared site boundary. The baseline study demonstrates that the proposed scheme would result in an improved daylight position when compared to a mirrored massing of the same height / form of no.76 itself and therefore represents a less harmful scenario than a typical equivalent neighbouring development if the relationship were to be mirrored. The proposed development achieves 1.65 times the daylight level compared to mirrored baseline scenario, which would represent a better neighbouring relationship than that assumption.
193. On balance, the effects to these windows are considered acceptable and in line with the BRE guidance for daylight effects.

#### *15 Fairview Avenue*

194. Located to the east of the site, this is a 2-storey detached dwelling, whose principal elevations are orientated north and south and would be limited to oblique views of the proposed development.
195. It is understood that a ground level flank window serves a small kitchen, and that two high level flank openings serve a dual aspect reception / living room. The opening within the side dormer at first floor level is obscurely glazed (bathroom). In line with BRE recommendations, the assessment has focused on the living room, kitchen and bedrooms within the neighbouring property.
196. Objection has been received from the occupiers of No.15, including on grounds that the development would be harmful to their amenity through reduced daylight and sunlight conditions, and that the application of the mirrored assessment is inappropriate for this proposed development, as noted in the 'Consultations' summary.
197. VSC results show that relevant habitable windows within the northern and southern elevation record no noticeable change in sky view, fully meeting BRE target levels. Three flank windows at ground level fall

short of the BRE daylight recommendations – these are the single window to the kitchen (W4) and two high-level flank windows to a living room (W2 / W3).

198. The kitchen retains 0.61 (61%) its existing VSC, and this is a small kitchen at c.5-6sqm in area. When compared to existing conditions, this would fall below the BRE recommended target of 0.80 times the former value, which is considered a noticeable daylight reduction that would result in harm to amenity. The results should though be considered in the context that this is a flank wall position where daylight levels are typically lower and relationships are closer.
199. Reductions in Vertical Sky Component (VSC) are limited to the high-level flank windows (W2 and W3) serving the living room. These windows would experience a reduction in VSC from 27% in the existing situation to between 12% and 12.3% following the proposed development, resulting in retained values below the BRE's recommended 0.80 retained level. This represents a noticeable reduction in the amount of visible sky from these secondary openings and weighs modestly against the proposal. However, the living room is dual aspect, with its principal source of daylight provided by the main south-facing window, which would continue to achieve a high post-development VSC of approximately 32%. Furthermore, the No Sky Line (NSL) assessment demonstrates that 97% of the room would continue to receive direct skylight, comfortably satisfying the relevant BRE guidance. Taken together, whilst the proposal would give rise to a degree of daylight reduction through the high-level flank windows, the room would remain well lit overall, and occupants would continue to experience a good standard of daylight and residential amenity.
200. The exception, in terms of NSL results, is the ground level kitchen as this would reduce to 0.74 with the proposed development. This represents a minor transgression from the target levels. In absolute terms, the space continues to receive daylight penetration to at least 73% of the area and so retained daylight levels are still considered good, particularly for a room to a flank elevation that is situated so close to the site boundary.
201. Post development effects to No.15, below the target BRE levels, would, it is considered be unavoidable given its proximity to the shared site boundary, given existing site conditions (i.e. relatively open site with low-scale buildings) and if a reasonable quantum of development is to come forward that is seeking to make most efficient use of this previously developed land, and optimise housing delivery on a site allocated for development in Brent's Local Plan. Accordingly, an alternative mirrored baseline study has been carried out, following the BRE guidance, which shows that the proposed development compares favourably to a reciprocal massing mirrored across the shared boundary. VSC mirrored baseline results indicate that the kitchen window to No.15 would retain 2.13 times its mirrored baseline, meaning that it would receive more than double the amount of sky visibility (and therefore daylight) with the proposed development than it would with a mirrored scenario.
202. Accordingly, whilst the proposal would result in some reductions in daylight to No. 15 when assessed against the existing baseline, these effects must be considered within the context of the site's allocation for redevelopment, the efficient use of previously developed land, and the BRE's own guidance on the use of mirrored baseline assessments in circumstances such as these. The mirrored baseline demonstrates that the proposed development would be substantially less overbearing than a comparable form of development on the neighbouring site, with the affected kitchen window retaining 2.13 times the level of sky visibility that would be expected under a mirrored scenario.
203. Given the specific relationship No.15 has with the application site, it is reasonable to recognise that identified daylight and sunlight effects arising from the proposed development are strongly influenced by the inherent design of this neighbouring dwelling (including its siting in close proximity to the shared boundary and its internal configuration which results in its kitchen being reliant on a neighbouring site for outlook). Furthermore, the proposed development has been purposely designed to transition down in height to respect existing properties to the east, which includes No 15.
204. For sunlight to neighbours, in accordance with BRE guidance, sunlight assessment principally relates to loss of sunlight to main living rooms (within 90 degrees of due south) and external amenity spaces. Kitchens and bedrooms are generally not the primary focus of sunlight assessment. Kitchens are relevant for daylight assessment (e.g. VSC and NSL, as discussed above) but would not typically be assessed for sunlight conditions, unless for example it was a combined kitchen/living/dining space – which is not the case here. The APSH calculations show that the living room space of No.15 would comfortably exceed the recommendations of at least 25% for total annual sunlight levels and 5% during the winter months with APSH levels of 79% and Winter Probable Sunlight Hours (WPSH) levels of 23%. Full compliance for sunlight under the BRE guidelines has been demonstrated in respect of No.15.

205. In summary, the proposed development would result in some adverse daylight effects to No. 15 Fairview Avenue, principally affecting a small flank-facing kitchen window located close to the shared boundary. Whilst this would result in a noticeable reduction in daylight levels when assessed against certain BRE recommendations, the affected room would continue to receive good levels of daylight penetration in absolute terms and the main habitable rooms within the dwelling would retain acceptable levels of daylight and sunlight. The living room, which represents the principal habitable space, would continue to comfortably meet the relevant BRE guidance for both daylight and sunlight.
206. It is also important to recognise that the relationship is influenced by the particular siting and design of No. 15 itself, including its close proximity to the site boundary and reliance on flank-facing windows for daylight. The proposed development has been designed to reduce height towards the eastern boundary in recognition of neighbouring residential properties, and the mirrored assessment demonstrates that the resulting relationship compares favourably to a reciprocal form of development. On balance, whilst a degree of daylight harm would arise and is afforded weight in the assessment, the impact on the overall living conditions of occupiers at No. 15 Fairview Avenue is not considered unacceptable.

#### *85-91 Chaplin Road*

207. This terrace of houses is located to the south of the site, on the opposite side of Chaplin Road. Once again, as windows orientated facing the site are north facing, they would not be relevant for sunlight testing in accordance with BRE guidance. Only daylight effects need to be assessed.
208. VSC results indicate there to be isolated cases where windows are shown to be below the BRE target levels of retaining at least 0.80 times their former level, and these are limited to very minor transgressions. For example, affected windows are to retain 0.77-0.78 time their former level, so such changes are not considered to be perceptible.
209. In terms of NSL to the rooms, all rooms tested comfortably meet the BRE guidance of 0.80 times their existing level with the proposed development in place.

#### *Overshadowing; Sunlight assessment to neighbouring amenity spaces*

210. The assessment of sunlight (overshadowing) to neighbouring gardens concentrates on 15 Fairview Avenue, gardens and amenity space to the north and south are not considered sensitive to change. The test assesses whether a garden or amenity space receives adequate sunlight on 21 March. At least 50% of the garden or amenity area should receive at least 2 hours of sunlight on 21 March.
211. In accordance with BRE guidance, post development at least 62% of the garden serving No.15 would receive a minimum of two hours of direct sunlight on 21 March.
212. In summary then of the potential amenity impacts, having duly considered all neighbour representations and noting the isolated relationship (with 15 Fairview Avenue) where 18m separation isn't maintained between facing habitable windows, the proposed development otherwise accords with relevant neighbour amenity tests set out in SPD1 and maintains appropriate and in places generous separation distances. Development proposed is considered to be of a height and massing that is appropriate and which sensitively steps down in scale towards the eastern site boundary to respect the existing context and nearby sensitive receptors, whilst still looking to optimise use of the site for housing, which is encouraged by the NPPF and is appropriate given it is previously developed land in a sustainable location, and meets the wider aspirations of the Local Plan in respect of housing growth.
213. As identified above, there would be some negative effects in terms of impacts to daylight and sunlight conditions to nearby sensitive receptors. Change to the prevailing amenity conditions is to be expected in an already built-up context, where existing baseline levels reflect the nature of the low-scale buildings currently on the site. Such baseline conditions make surrounding receptors more susceptible to greater proportional change. Where identified post development daylight and sunlight effects are greater these are isolated to a small number of flank wall windows, and such effects are exacerbated by these windows' close relationships to the shared boundary and should not therefore prejudice the redevelopment potential of this allocated site.
214. The proposed development and its relationship with surrounding residential properties is, on balance, considered to respond satisfactorily to the key amenity considerations of spacing between buildings, privacy, outlook, daylight and sunlight, and therefore accords with Local Plan Policy DMP1. Whilst the

proposal gives rise to some isolated conflict with the numerical guidance contained within SPD1 and results in localised reductions in daylight and sunlight to a limited number of neighbouring properties, these impacts have been assessed in detail and are not considered to result in unacceptable living conditions. Nevertheless, they attract moderate weight against the proposal in the overall planning balance. This identified harm must be considered alongside the wider public benefits of the scheme, including the efficient redevelopment of an allocated brownfield site, the delivery of new homes (including affordable housing), and associated economic and regeneration benefits.

**Energy and sustainability (including overheating)**

- 215. All major developments are expected to achieve zero carbon standards including a minimum 35% reduction on the Building Regulations 2021 Part L Target Emission Rates (TER) achieved on-site, in accordance with the energy hierarchy (Be Lean, Be Clean & Be Green) set out in London Plan Policy SI2.
- 216. Major developments are required to prepare and submit an energy strategy to demonstrate how the zero-carbon target (London Plan policy SI 2) would be achieved within the framework of the energy hierarchy. Residential development should achieve 10% at the 'Be Lean' stage through enhanced building fabric performance. 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 Council, through an appropriate financial contribution towards Brent's carbon-offsetting fund should be agreed to compensate for any residual carbon emissions or through off-site measures. The carbon-offset payment shall be based on the notional price per tonne of carbon of £95 over 30 years. Ongoing monitoring and reporting of energy performance is also required under the 'Be Seen' part of this policy.
- 217. Policy SI4 requires the energy strategy to include measures to reduce the potential for internal overheating and reliance on air conditioning systems.
- 218. Brent's Sustainable Environment and Development Supplementary Planning Document (adopted June 2023) provides guidance on a range of sustainable development issues.
- 219. Planning applications for major development are required to be supported by a Sustainability Statement in accordance with Policy BSU11, demonstrating at the design stage how sustainable design and construction measures would mitigate and adapt to climate change over the lifetime of the development, including limiting water use to 105 litres per person per day.

*Carbon Reduction:*

- 220. The submitted Energy Statement (dated 07.01.26) outlines the approach to carbon emission savings and renewable energy and aligns with the London Plan energy hierarchy and follows the methodology set out in the GLA Energy Assessment Guidance (2022).
- 221. Baseline CO2 emissions for a building regulations Part L 2021 compliant building were established and the three-step energy hierarchy consisting of Be Lean, Be Clean and Be Green measures were applied to demonstrate compliance with the relevant policy targets.
- 222. The proposed development achieves a 13% reduction in energy demand at the 'Be Lean' stage and an overall 75% reduction in regulated carbon emissions compared with the Part L 2021 baseline. These savings are achieved through a combination of enhanced building fabric performance, improved airtightness, efficient ventilation systems (MVHR serving apartments and dMEV serving proposed houses), reduced domestic hot water demand, the use of air source heat pumps (communal system for the flats and individual systems for each house) and the use of PV panels on available roof space. The residual carbon emissions would be offset through a carbon offset payment in lieu, as the zero-carbon policy target cannot feasibly be met on-site. This contribution, estimated to be £73, 365 (£95 / tonne of carbon), would be secured within the s106 legal agreement, and the proposals are therefore considered acceptable in energy and carbon reduction terms.
- 223. The site wide cumulative CO2 emissions and savings are presented in the table below;

	<b>Policy target</b>	<b>Be Lean</b>	<b>Be Clean</b>	<b>Be Green</b>	<b>Proposed</b>
<b>Energy</b>					

% of on-site carbon savings beyond Part L of Building Regulations (2021)	35%				75% cumulative carbon savings
% of on-site carbon savings achieved through Be Lean energy efficiency measures		13%			13% stage saving
% of on-site savings achieved through Be Clean measures			0%		0% stage saving
% of on-site savings achieved through Be Green measures				61%	61% stage saving
Off-site reduction % and/or carbon off-set contribution	Shortfall to net-zero (residential)				£73,365

*Be Seen:*

224. In line with London Plan Policy SI2, the energy performance of completed development is required to be monitored, verified and reported following construction. This would include monitoring of the performance and output of the PV system and the communal / individual ASHP's. Further details are to be secured via obligations in the s106 legal agreement.

*Sustainable development:*

225. The application is supported by a Sustainability Statement, to demonstrate how sustainability considerations have been embedded throughout the design process, and how Brent's SPD1 and Sustainable Environment and Development SPD, have both been informed the sustainability measures.

226. As referred to above, the proposed development adopts a robust fabric-first approach and follows the London Plan Energy Hierarchy, prioritising demand reduction, efficient building services and low-carbon heat generation. An all-electric heating strategy is proposed. The energy strategy delivers reductions in regulated carbon emissions well beyond Building Regulations Part L requirements. The development has also been designed to mitigate overheating risk (see below).

227. Water efficiency has been designed in accordance with London Plan targets, achieving a maximum internal consumption of 105 litres per person per day. Surface water runoff is managed through an integrated sustainable drainage strategy incorporating green roofs, permeable surfaces and on-site attenuation, ensuring that flood risk is not increased on or off-site and that the development is resilient to climate change.

228. The proposals promote sustainable travel through a low-car approach supported by a PTAL rating of 4, cycle parking provision in line with standards, electric vehicle charging infrastructure from the outset and strong pedestrian connectivity. Other wider sustainability benefits to be delivered, include, urban greening and biodiversity enhancements, and these are discussed within relevant sections of this report.

229. Collectively, these measures ensure compliance with policy aspirations for a resilient, low-carbon, well-designed and climate-adapted development.

*Overheating Assessment:*

230. Policy SI4 (Managing heat risk) of the London Plan confirms that major development proposals should demonstrate how they would reduce the potential for internal overheating and reliance on air conditioning systems in accordance with a hierarchy that prioritises passive measures over active measures. In line with Policy SI4, the Applicant submitted a detailed Overheating Report (rev 4) for the proposed development. This report assesses the overheating risk in accordance with Approved Document O – 2021 Overheating, using the methodology from CIBSE TM59.

231. Measures incorporated into the design to mitigate overheating risk include:

- Glazing ratio's (amounts of unopenable and openable glazing), building fabric U-values, natural ventilation, ventilation with purge fans (for selected rooms) and use of leak lopping ventilation

232. Within blocks A-D, a total of 55 dwellings pass Part O when naturally ventilated with background ventilation. An additional 39 dwellings (blocks A-D) were able to pass using natural ventilation with background ventilation and additional purge into select rooms. Purge ventilation is a type of ventilation used to remove unwanted air from a space and replace it with fresh air and is typically achieved by opening windows / doors to create natural airflow, or by using high-capacity fans / mechanical ventilation systems. All communal areas within the blocks A-D pass Part O (Overheating). Two of the houses are able to pass through natural ventilation via openable windows and background ventilation. The other seven townhouses were able to pass with background ventilation and additional purge into select bedrooms. All the 108 homes proposed pass Part O (Overheating) requirements, either when naturally ventilated, or where these will be subject to the incorporation of the specified mitigation measures.

233. The assessment demonstrates that the risk of overheating has been appropriately mitigated through the incorporation of passive design measures, including optimised glazing ratios, enhanced opportunities for natural ventilation, the use of thermal mass, external shading features. The report follows the formal hierarchy for the ventilation strategy to remove excess heat from the development. Dwellings that require peak lopping are only required due to security restrictions (i.e. where windows are easily accessible at ground level).

## **Environmental considerations**

### *Air quality*

234. Like many areas in Brent, the site is in an Air Quality Management Area (AQMA). London Plan Policy SI 1 requires that all major developments within London are Air Quality Neutral. As such, an Air Quality Neutral Assessment needs to be undertaken and submitted with the planning application. Brent's Policy BSUI2 requires major developments outside of Growth Areas and Air Quality Focus Areas, also to be Air Quality Neutral. The NPPF (paragraph 170) also states developments should make every effort to ensure local air quality conditions are improved.

235. The application has been accompanied by an Air Quality Assessment (AQA) which includes an Air Quality Neutral Assessment. This assessment considers the potential air quality impacts associated with the development, including from demolition, construction, traffic and operational impacts. These impacts could be experienced from the construction including dust generation and track-out.

236. A Construction Management Plan (CMP) has been submitted which sets out commitments to minimise effects on air quality during the demolition and construction phases. Details of the type of piling proposed and measures to mitigate the effects of noise and dust are also contained within the Plan, which includes a Construction Dust Assessment. All machinery delivered and operated on site would, it is confirmed, be compliant with the London Non-Road Mobile Machinery (NRMM) standards. The operational impact of the proposed residential development, with limited parking, does not give rise to any air quality impact concerns.

237. The Air Quality Neutral Assessment confirms the development would not incorporate combustion-based heating systems, but it would utilise electric and renewable technology systems. It also demonstrates that trip rate generation annually would fall well below the GLA's Air Quality Neutral, transport emissions benchmark level.

238. As such it has been demonstrated that the proposed development would be air quality neutral in relation to traffic and building emissions. Specifically, the development proposes limited parking, at a level well within maximum standards, so it would generate significantly less traffic than the existing site uses could do. Additionally, all on site parking spaces are proposed to be fitted with electric vehicle charging infrastructure from the outset, further reducing potential air quality impacts. The proposed energy strategy would be all electric and/or renewable.

239. The AQA confirms that future occupants of the development would experience acceptable air quality, and in any event, this is an established residential location.

240. The AQA has been reviewed by Environmental Health officers, who have confirmed that it is acceptable and that there are no objections in relation to air quality subject to the CMP being secured by condition.

## *Noise and vibration*

241. London Plan Policy D14 expects new developments to reduce, manage and mitigate noise to improve health and quality of life. Policy D13 (Agent of change) of the London Plan expects that planning decisions reflect the Agent of Change principle and take account of existing noise and other nuisance-generating uses in a sensitive manner when new development is proposed nearby, with the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. NPPF (paragraph 187) states that new development should avoid giving rise to adverse noise impacts on the site and surrounding area.
242. A Noise Impact Assessment (NIA) was submitted with the application, and this assesses baseline noise conditions (through site survey and modelling) and assesses noise effects on future residents of the proposed development, to determine the suitability of the site for residential development. The assessment gives acoustic performance specification for the building fabric to ensure recommended internal noise levels are achieved. The baseline noise monitoring survey identifies existing sources of external noise in the vicinity of the site, which are primarily from road traffic and in the northwestern corner, plant noise was audible from existing buildings on the wider NHS estate.
243. Noise modelling was then carried out and the internal and external noise levels for future residents were able to be predicted. The assessment demonstrates that with mitigation measures in place then the internal noise levels in the habitable rooms would be in line with BS8233:2014. Mitigation solutions proposed include use of standard double glazing to achieve a minimum sound insulation, MVHR or dMEV units to be installed for background ventilation and openable windows suitable for the mitigation of overheating. The design-led mitigation incorporated into the proposed development, such as building massing, layout (i.e. creating a sheltered communal courtyard space) and positioning of amenity spaces away from primary noise sources would ensure an acceptable external noise environment is achieved for future residents.
244. Having considered the submitted NIA, Environmental Health Officers raise no objection, and to safeguard against the potential for plant noise to result in harm to nearby residential amenity a condition is recommended that would require the plant rating level to be 10dB below the typical background noise level.
245. In conclusion, subject to appropriate conditions being secured the proposed development is not expected to result in adverse impacts on future residents, arising from noise.

## *Ground conditions / Contaminated land*

246. The application is supported by a Phase 1 and Phase 2 Geo-environmental and Geotechnical report (i.e. a ground investigation report). Preliminary investigation was undertaken to identify and contamination and/or geotechnical constraints to development, and to identify whether additional investigation or remediation works may be required to support safe development and make the site suitable for use.
247. The assessment acknowledges that the intrusive investigation was limited to external areas of the site only, and therefore ground conditions beneath the existing buildings and potential risk to proposed end users have not been fully assessed.
248. Having been reviewed by Environmental Health officers, owing to the data gap concerning absence of intrusive investigation beneath existing buildings, further investigation should be carried out (post demolition). A condition is recommended relating to a requirement for further post demolition intrusive investigation and remediation works (if deemed to be required), that would need later to be verified.

## *Construction methods*

249. The submitted Construction Management Plan, rev03 (May 2026) sets out how construction related effects are to be minimised, managed and mitigated against. The construction programme is anticipated to last for a period of 27 months (following demolition and enabling works, which are expected to last for four months).
250. The substructure construction would comprise of a combination of methods, including CFA piling and traditional trench or raft foundations. Superstructure construction would be a combination of brick and block walling with pre-cast concrete floors (blocks A-D) and brick and block walling with timber joists and flooring (houses).

251. Heras fencing, metal fencing, access gates and hoarding would be erected around the perimeter of the site, for safety reasons and to prevent intrusion.
252. All machinery delivered and operating on site would be compliant with Non-Road Mobile Machinery (NRMM) Regulations 1999 and this is secured by condition. It is also confirmed that asbestos surveys have been carried out, and that all works during the demolition and enabling phase involving asbestos, would be strictly carried out within the Control of Asbestos Regulations 2012, by appointed specialist contractors. The removal of asbestos is controlled by other legislation, so it is not controlled / enforceable through planning legislation. An Informative is any event recommended to be attached to any decision to remind the applicant of their responsibilities.
253. A mobile crusher would be used on site for a time-limited period, to re-use the demolition material for the piling platform. It is envisaged this would be used during the initial 3 month enabling work period.
254. Stated working hours are proposed; 0800 - 1800 hours (Mon-Fri) and 0800 – 1300 (Sat). Out of hours construction deliveries to site would be avoided where possible.
255. Construction traffic access would be via Fairview Avenue, with the access controlled by traffic marshalls and vehicle routeing details are set out in the CMP, with this concentrated to distributor roads when travelling to and from the North Circular Road at Hanger Lane.
256. Waste management, wheel washing facilities, dust management, noise and vibration controls and air quality controls are all suitably embedded into the CMP to minimise construction related impacts.
257. The stage 1 site compound / welfare facilities are proposed to be in the north-eastern corner of the site, and at the request of officers, these facilities have been reconfigured to move them further away from the eastern site boundary. The reasons for seeking this change were two-fold; firstly, in order to minimise impacts on residential amenity by seeking an increased offset from the boundary and secondly to safeguard existing trees that are being retained in this area. The stage 2 welfare area would be towards the western side of the site and shall be accommodated within the ground floor of block D whilst the site remains under construction, which is fine.
258. The submitted CMP provides a suitable framework for managing construction impacts, and compliance with the submitted CMP, rev 03 (May 2026) is secured through condition.

## **Flood risk, drainage and water**

### *Flood risk and drainage*

259. Paragraph 173 of the NPPF states that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere and that where appropriate, applications should be supported by a site-specific flood risk assessment. Part c of paragraph 173 requires development to demonstrate that they incorporate sustainable drainage systems, unless there is clear evidence that this would be inappropriate.
260. London Plan policy SI12 requires development proposals to ensure that flood risk is minimised and mitigated, and that residual risk is addressed. 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.
261. 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.
262. Policy BSUI3 highlights that proposals requiring a Flood Risk Assessment (FRA) must demonstrate that the development would 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 FRA must contribute to flood risk management and reduction and:
- a) minimise the risk of flooding on site and not increase the risk of flooding elsewhere;

- b) wherever possible, reduce flood risk overall;
- c) ensure a dry means of escape;
- d) achieve appropriate finished floor levels which should be at least 300mm above the modelled 1 in 100 year plus climate change flood level; and
- e) not create new basement dwellings in areas of high flood risk.

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

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

265. The submitted Flood Risk Assessment and Drainage Strategy report (FRA-DS) has been reviewed on behalf of the Local Lead Flood Authority (LLFA).

266. The application site is located within Flood Zone 1, which is defined as having a low probability of flooding from fluvial or tidal sources. The nearest watercourses are the Grand Union Canal and Wealdstone Brook, both are far enough away so as not to pose a flood risk to the site. It is accepted that the risk of flooding from fluvial sources is low and that the principle of development of the site for residential use is acceptable from a strategic flood risk perspective.

267. Localised pockets of the site (north-western part) and its surroundings are categorised to be at risk from surface water flooding. This is partly due to existing site conditions, namely the presence of car park areas surrounded by existing buildings set lower than the surrounding topography. The site is within an identified Critical Drainage Area (CDA).

268. There are no identified risks from groundwater or sewer flooding.

269. The proposed drainage strategy adopts a sustainable drainage systems (SuDS) approach, incorporating at source measures such as green roofs, permeable paving and rain gardens, alongside below-ground attenuation storage with controlled discharge to the existing combined Thames Water surface water sewer on Chaplin Road. This would restrict post development runoff to 5 l/s, which is a significant betterment over the current unattenuated discharge rates from the existing site, thereby mitigating flood risk both on and off site. Due to underlying ground conditions and the low infiltration rates, infiltration is considered inappropriate, hence the reason for the proposed attenuation based strategy. The estimated post development runoff betterment is as per the table below;

<b>Storm return period</b>	<b>Existing runoff (l/s)</b>	<b>Proposed runoff (l/s)</b>	<b>Betterment (%)</b>
1 year	18.5	5	73%
30 year	44.6	5	89%
100 year	58.7	5	91%

270. Additionally, to manage pluvial flooding (surface water) the external levels have been designed to ensure that overland flow from off site is directed through the landscape areas to the south east and out of the site.

271. This strategy complies with the SuDS hierarchy and seeks to reduce surface water runoff rates. The strategy has been designed to accommodate rainfall events up to the 1 in 100-year return period, including a 40% climate change allowance, in line with national and local policy requirements. The underlying London Clay geology limits the feasibility of infiltration drainage methods, owing to its low permeability, and therefore a controlled discharge solution is considered appropriate.

272. On review of the FRA-DS, comments received on behalf of the LLFA noted there to be limited provision of surface SuDS features within the north-eastern/eastern parts of the site, where the submitted FRA-DS indicates some surface water flooding has historically been predicted to occur. The applicant was encouraged to reconsider whether additional SuDS features could be integrated within these parts of

the site and asked to provide more clarity on overland flow routing. Additionally, it was noted that in respect of the drainage strategy, the proposed approach to attenuation and discharge control did not include sufficiently detailed hydraulic modelling, and the applicant was required to provide further information.

273. Following the submission of additional information, including detailed drainage modelling and an updated exceedance flow routing plan, it has been confirmed on behalf of the LLFA that these concerns have been satisfactorily addressed. The proposals demonstrate that surface water would be directed away from buildings and safely conveyed toward the public highway, and that the drainage network has sufficient capacity to accommodate up to the 1 in 100 year plus +40% climate change event. It is also considered that the proposed approach to surface water management, including permeable paving and on-site attenuation, is acceptable in principle. Adherence to the proposed drainage strategy and on-going management of this would be secured by condition.

274. Thames Water was consulted and raise no concerns in terms of network capacity or surface water drainage. They have requested a Piling Method Statement be secured by condition, to prevent and minimise potential for damage to subsurface sewerage infrastructure during demolition and construction phases (as the development is within 15m of a strategic sewer).

275. To summarise, the FRA-DS adequately assesses the risk of flooding from external sources such as fluvial, sewer, groundwater, which is low. It also adequately assesses the risk from surface water flooding, with an appropriate mitigation and drainage / SuDS strategy proposed. The proposed development is not expected to increase flood risk off-site which is necessary given the site has been identified as being within a CDA.

#### *Water consumption*

276. In order to meet a water consumption target of less than 105 litres per person per day, in line with London Plan policy SI5 and Local Plan policy BSUI4, a condition is recommended to ensure the development achieves or exceeds this.

#### **Ecology, biodiversity, urban greening and green infrastructure**

277. London Plan policy G6 (Biodiversity and access to nature) seeks to ensure that proposals manage impacts on biodiversity and aim to secure net biodiversity gain. Local Plan policy BG11 (Green and blue infrastructure) promotes the enhancement and support of biodiversity and ensuring that developments do not undermine the biodiversity of green chains. Part (d) of the policy 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.

278. 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.

#### *Ecological conditions*

279. The site is not subject to any statutory or non-statutory ecological designations and is located within an urban context. The nearest statutory designation is Perivale Wood Local Nature Reserve approximately 1.6km to 1.8km away, with no anticipated impacts due to distance and intervening development.

280. An Ecological Assessment, prepared by Red Ecology Limited, dated January 2026 has been provided in support of the application. This assessment has been reviewed by the Council’s Principal Ecology Officer. A habitat survey was undertaken on 18 December 2024 and a programme of surveys for bats was undertaken across spring and summer 2025. No evidence was found of bats roosting in the existing buildings to be demolished, though there was some evidence for the use of the site by foraging/commuting bats. The proposed retention of the existing mature trees would be beneficial in this regard. The Council’s Principal Ecology Officer (PEO) has found the assessment undertaken to be acceptable, in relation to bats, and recommends that external lighting should adhere to guidance

provided by the Institute of Lighting and the Bat Conservation Trust. Further details of lighting can be secured through planning condition.

281. The application site is currently of low ecological value, comprising predominantly buildings and hardstanding with limited areas of modified grassland, trees and shrubs. The most valuable ecological features on site are the mature trees, namely those along the Chaplin Road frontage, which are to be retained and supplemented with additional planting as part of the scheme.
282. Submitted surveys confirm the site is not considered suitable for reptiles, amphibians or badgers, and whilst hedgehogs may be present locally, this does not represent a constraint to development.
283. Overall, subject to the implementation of standard mitigation measures, the development is considered acceptable in ecological terms and compliant with relevant wildlife legislation and planning policy.

*Biodiversity Net Gain (BNG):*

284. As the application was submitted after 12th February 2024 the mandatory 10% net gain in biodiversity is applicable to the proposed development.
285. The DEFRA Statutory BNG Metric is a calculation tool created by Natural England to assess an area's baseline value to biodiversity, and then to compare that to the post-development value of the same site. This is then used to establish whether there would be any measurable net gain in biodiversity conditions on site.
286. BNG is an approach to development that leaves biodiversity in a better state than before. This means that where biodiversity is lost as a result of a development, the compensation provided should be of an overall greater biodiversity value than that which is lost, notwithstanding that losses should, in the first instance, be avoided.
287. A Biodiversity Net Gain Assessment (1049.BNG.Final.02), prepared by Red Ecology Limited, dated May 2026 has been provided in support of the application, together with accompanying BNG Metric. This establishes a baseline (pre-development) biodiversity value of 2.29 habitat units, reflecting the limited ecological value of the existing site, which is predominantly comprised of buildings and hardstanding, with small areas of low-value habitats such as modified grassland and scrub. Following redevelopment, the site is projected to deliver 2.56 habitat units, representing a net gain of +0.27 units, equivalent to a +11.74% uplift. This uplift would be delivered entirely on-site, in accordance with the mitigation hierarchy, and no off-site compensation is proposed or required to meet statutory net gain requirements. The submitted BNG assessment confirms that the biodiversity trading rules are met, including the replacement of medium distinctiveness habitats such as mixed scrub with equivalent newly created habitats.
288. The proposed biodiversity enhancements rely on a combination of habitat creation and management measures, including:
- Introduction of mixed scrub and shrub planting, urban greening features, installation of green roofs, retention of existing urban trees, additional tree planting and creation of ornamental hedgerows
289. While these measures can achieve a measurable uplift, it is noted that a number of the created habitats are of low distinctiveness.
290. The Council's PEO has reviewed the submission and advises that, although the scheme technically achieves the required net gain, it is finely balanced, with the reported uplift of 10.88% (subsequently increased to 11.74%) only marginally above the statutory 10% requirement. As such, it should be noted there is very limited tolerance for any subsequent design amendments, changes in layout, or downgrading.
291. A section 106 legal agreement must be secured, which must include:
- Submission and approval of a Habitat Management and Maintenance Plan prior to commencement to correspond to the details set out within Biodiversity Gain Plan (secured separately by statutory condition)

- Details of all habitat creation and management measures
- A minimum 30-year habitat management and monitoring strategy
- Monitoring and reporting requirements with associated costs (identified as approximately £31,914)
- Full specification of ecological enhancements, including green roofs, planting and wildlife features

292. Furthermore, the PEO recommends the scheme to incorporate a range of biodiversity enhancements as part of good practice, including bird boxes, bat boxes and invertebrate features, which are necessary to ensure that the development delivers meaningful ecological benefits alongside the numerical gain. These further details can be secured post decision, via a suitably worded condition.

293. Overall, it has been demonstrated that the development can achieve the statutory requirement for a minimum 10% biodiversity net gain, this uplift is marginal and sensitive to change. Nevertheless, the proposed development is considered to comply with Policy G6 of the London Plan and Local Plan Policy BGI1 and meets the mandatory 10% net gain requirement. Conditions and / or planning obligations would be imposed to ensure that details of the landscaping and biodiversity enhancements are secured, including over the long-term and therefore a net gain is achieved post development and that it would be maintained over time.

### *Lighting*

294. A detailed external lighting strategy would be required following the grant of planning permission, to ensure the spaces in and around the buildings, including the areas of public amenity space and public realm, would be safe, accessible and welcoming, and that light spill would not affect surrounding residential properties (or ecology). Indicative details show that key routes through the site would be well lit, and low-level lighting would be used where it is appropriate to do so (i.e. within the communal courtyard). Column lighting is envisaged to be used across the Chaplin Road landscaped frontage, and across Fairview Court, to the northern part of the site where cars would be parked and vehicles access the site. These further details shall be secured through condition, and the detailed lighting scheme would be expected to demonstrate how due consideration has been given to the potential impact lighting would have on wildlife (including bats).

### *Urban greening*

295. London Plan Policies G1 and G5 emphasise the importance of urban greening in development. Acceptable urban greening features include street trees, green roofs, rain gardens and hedgerows. Policy G5 recommends that a target Urban Greening Factor (UGF) score of 0.4 should be achieved on predominantly residential developments. Brent Local Plan Policy BGI1 states that in meeting the urban greening factor major developments should place emphasis on solutions that support biodiversity.

296. The UGF score calculated for the proposed development is 0.4, which accords with relevant policy. This is achieved through a combination of proposed new landscaping features and green infrastructure across the site, including a significant quantum of new trees, green roofs, flower rich perennial planting, rain gardens, amenity grassland, hedges, and SuDS features.

297. The measures proposed would be secured by condition to ensure that the anticipated UGF score is achieved or exceeded. Overall, it is considered that the potential for urban greening on site has been reasonably maximised and relevant London Plan (G1 and G5) and Brent policies (BGI1) are complied with.

### *Green infrastructure (trees and landscaping)*

298. London Plan Policy G1 states that development proposals should incorporate green infrastructure. Policy G4 states that development proposals should where possible create areas of publicly accessible open space. Policy G7 states that development proposals should ensure that, wherever possible, existing trees of value are retained; if trees are removed, there should be adequate replacement based on the value of the benefits of the trees removed, using appropriate valuation system; and the planting of additional trees should generally be included.

299. Policy DMP1 seeks to retain high amenity trees and landscape features and provide appropriate additions or enhancements. Trees are a key component of green infrastructure and help to create resilient and more sustainable development. Policy BGI2 (Trees and Woodlands) seeks to ensure that

trees are protected as much as possible and to re-provide where loss is unavoidable

### *Trees*

300. The Tree Survey and Impact Assessment submitted identifies significant existing trees off-site to the north of the site, along the Chaplin Road frontage and adjacent to the eastern boundary. Whilst not currently protected by a Tree Preservation Order (TPO), these are considered significant enough to amenity to warrant protection. The submitted Tree Protection Plan (TPP) proposes these trees to be retained, which is welcomed.
301. The survey has identified several category B trees for retention and a number of category C trees for retention. An Arboricultural Impact Assessment (AIA) has been submitted which identifies four category C trees (trees of low quality) to be removed (T1, T2, T31 and T36), none of which are close to site boundaries. Total canopy cover lost would be c.270sqm.
302. The landscape strategy proposes many new trees across the site, 177 in total, which are to be a mix of standard trees and multi-stem. The strategy would position standard trees along boundaries and throughout the areas of public realm, multi-stemmed trees would be planted would be positioned within the courtyard and closer to buildings. The Council's Principal Tree Officer (PTO) considers the indicative palette to represent a good starting point, however, in drawing up the detailed landscape scheme (which would be secured by condition) it is encouraged that maximum use be made of larger canopied trees in areas of the site that can accommodate them (i.e. within the courtyard space, away from buildings, along the Chaplin Road frontage and along Fairview Walk). This should be considered in more detail at conditional discharge stage.
303. The proposed range of planted trees are estimated to achieve a replacement canopy cover at the time of planting of c.1,800sqm. This significantly exceeds the lost cover and accords with Local Plan policy BGI2.
304. In summary, noting the proposed development would result in a significant net increase in trees on site and the retention of existing significant tree's, the Council's PTO raises no objection to the proposals overall and its impact on trees. The submitted TPP and Arboricultural Method Statement would both be secured through condition, and complied with throughout the development, and a detailed landscape condition is also required to confirm choice of species, size, location, future maintenance regime and all other relevant details.

### *Landscaping*

305. A detailed and considered landscaping scheme has been developed, which includes references to how the landscape design responds to the requirements of Brent's ASPQ SPD. The landscape strategy proposes to create distinctive landscape character areas:
- *Chaplin Road frontage*
306. Existing and new trees provide a visual and noise buffer from Chaplin Road, and a path through this area provides an alternative route, offset from Chaplin Road. Play trail features are dispersed through this area and the path provides a publicly accessible route. Front gardens to the Chaplin Road terrace would be provided with appropriate soft landscaping features to soften these frontages.
- *Landscaped street (Fairview Walk)*
307. This is a really key element of the overall landscape strategy, providing a place for social interaction and safe play for younger children, whilst also improving site permeability, and affording access to the dwellings along the eastern edge of the site.
308. The space would feature soft landscaping throughout, including buffer planting for ground floor units, retained trees, new trees, seating and play features. Heritage information boards are proposed to be located at each end, containing details of the site's heritage and further details of these boards would be secured through condition.
- *Central courtyard*

309. This space is located at the heart of the development and provides a shared space for residents of blocks A-D, including play features for 0-4 year olds. The space would include amenity lawn area, pergola, seating, and be planted, including new trees, buffer planting and community growing area. This private (but communal) space would offer opportunity for social interaction, safe play and a space that is well overlooked offering plenty natural surveillance.

- *Fairview Court*

310. This area is different in character, providing a shared surface from Fairview Avenue through the northern edge of the site. This would provide pedestrian priority access, signified by changes in hard paving types, and the space is broken up with pockets of soft landscaping.

#### *Roof space*

311. Inaccessible, biodiverse green roofs are proposed to blocks A-D, which would be beneficial for new habitat creation and the reduction of water runoff. Further details of the specification for these green roofs can be secured by condition.

#### *Access & circulation*

312. The landscape strategy features a hierarchy of accessible pedestrian routes, which primarily improve permeability and connections to surrounding streets. Secondary circulation routes through the site take users through shared communal areas and tertiary routes provide direct residential access to dwellings where required.

313. Vehicle access through the site is limited to the northern section, for limited residents parking, service vehicles as well as exiting of the approved NHS staff parking area on adjacent land north of the site.

314. Regarding the landscape strategy overall, this is considered to add value in terms of visual amenity and biodiversity within the site. The provision of new green infrastructure and publicly accessible open space within the development are welcomed and represent a well-considered approach in terms of landscaping and improved connectivity. The proposed landscaping would be a significant betterment compared to the existing site conditions with a net increase in trees, soft planting, biodiversity value and enhanced public realm across the site. The proposed garden roofs and permeable paving would improve sustainable drainage within the development. The proposals are considered to be in accordance with London Plan policies G1 and G4, and Local Plan policies DMP1, BGI1 and BGI2, subject to a condition requiring the submission and approval of a detailed landscaping scheme showing details of new trees and their location, specification of new planting on the green roofs, hard landscaping materials, boundary treatments, street furniture and details of long term maintenance.

#### **Transport and access considerations**

315. London Plan policy T1 sets a strategic aim for all development to make the most effective use of land reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated. Local Plan Policy BT1 seeks to promote sustainable patterns of development in the borough, minimising the need to travel and reducing the dependence on private motor vehicles.

316. The application is supported by a Transport Assessment (TA), which considers the potential effects of the proposed development on the local highway and transport network. This is supported further by a Framework Travel Plan (FTP), Construction Logistics Plan (CLP), Construction Management Plan (CMP) and Delivery and Servicing Plan (DSP).

#### *Highway considerations*

317. Chaplin Road is a traffic-calmed local distributor road and bus route. Controlled Parking Zone "SA" operates 10am-3pm weekdays (10am-midnight on Stadium event days). Along the Chaplin Road site frontage are permit bays, pay and display bays and a bus stop. Neither Chaplin Road or Fairview Avenue are heavily parked at night.

318. The site's Public Transport Accessibility Level (PTAL) is 4, which is classed as 'good'. Wembley Central Station is within 700m of the site, and Sudbury Town Station is also within 700m. Bus stops in

close proximity provide regular services also.

### *Access and parking*

319. London Plan policy T6 strongly supports a move towards more sustainable travel choices and expects car free development (in which only designated Blue Badge parking is provided) to be the starting point in accessible locations such as this. Brent Local Plan policies in chapter 6.8 also support car free development in places that are well connected by public transport, like the application site.
320. The existing NHS staff car parking provision across the application site amounts to 54 spaces, with approval recently granted for the re-provision of 27 of these spaces along the northern edge of the site (ref: 25/3046).
321. Primary means of access to the site (for vehicles and servicing) is proposed is via Fairview Avenue, which utilises an existing and long-established access to the site, so is fine in principle. Pedestrian access would be via Chaplin Road and Fairview Avenue, and the new pedestrian route (Fairview Walk) would also be beneficial for access/active travel.
322. In terms of residential car parking, London Plan Policy T6.1 (E) applies in Brent, in accordance with Appendix 4 of the Local Plan. The site has a PTAL rating of 4 so up to 0.5 spaces per dwelling would be allowed. This would equate to a maximum of 54 parking spaces.
323. Twelve car parking spaces are proposed. This would equate to 0.1 spaces per dwelling, which is within the maximum allowance. Three of these spaces are proposed to be marked as wide disabled bays and all are within the recommended 50m distance of the entrance to each of the blocks.
324. To ensure residents do not simply park on-street instead, a 'car-free' agreement would be required to ensure future residents of the development would be prevented from obtaining parking permits for the CPZ that surrounds the site. Blue badge holders residing in the development would not, however, be subject to any 'car free' agreement. CPZ's have been proven to be an effective means of restricting on-street parking.
325. A 'car-free' agreement would be secured through s106 legal agreement, and this is in line with the Council's wider policies on promoting non-car access to reduce congestion and pollution.
326. A Car Parking Management Plan (CPMP) has been included as an appendix to the TA of the Transport Assessment. However, it should be amended to confirm that only Blue Badge holders would be granted parking permits for the accessible bays, whilst the demand for disabled parking needs to be kept under review, to allow increased provision of wide bays if required. The plan also fails to set out the process for allocating permits or the duration of the permit. A final (updated) version of the CPMP shall be secured through condition.
327. Nine of the car parking spaces are proposed to be located at the northern end of the site, accessed via the existing site access onto Fairview Avenue. The other three spaces are proposed to be in the southeastern corner of the site, within the frontage of the Chaplin Road terrace and with access direct from Chaplin Road. These three spaces are shown arranged parallel to the highway with access via a 4.1m wide shared crossover.
328. The access arrangements would render existing crossovers to Chaplin Road redundant, along with an existing "KEEP CLEAR" zig-zag marking for ambulance access, which is no longer required. These would all need to be removed and reinstated to footway with full-height kerbs and extended parking bays at the developer's expense prior to occupation of the development. These limited highway works are to be secured by condition.

### *Cycle parking*

329. London Plan Policy T5 sets out residential cycle parking standards, though, the recently adopted London Plan Guidance 'Support for Housebuilding' (March 2026) is a material consideration. Amongst a range of measures the LPG sets out time-limited changes to cycle parking requirements which apply until 31 March 2028. These changes introduce reduced standards for development in band 2 (Brent), meaning the following standards can be applied to development proposals; 1-bed (0.9 spaces, 2-bed (1.3 spaces) and 3-bed (1.6 spaces).

330. The overall provision of 149 cycle parking spaces, comprising 145 long-stay spaces, plus 4 short-stay spaces, including a proportion of larger sized spaces and Sheffield stands would comply with and exceed the Support for Housebuilding LPG requirement for 141 spaces. For context the LPG has recently been adopted by the GLA to expedite the delivery of housing in London. The LPG is intended to be read in conjunction with the London Plan. London Plan policy T5 standards would normally require 202 long-stay spaces, plus 4 short-stay spaces. Three separate internal cycle stores are proposed within the ground floor of blocks A-D, and each of the houses is to be provided with its own cycle shed within the rear amenity space. Short-stay spaces are dispersed across the site within the areas of public realm. All long-stay cycle parking would be provided in easily accessible, secure, covered and lockable cycle stores in accordance with London Plan and LCDS standards.
331. While it is noted that the overall provision of cycle parking would, in the case of long-stay spaces be below London Plan policy T5 standards, it is in accordance with the Support for Housebuilding LPG which is current adopted GLA guidance and is a relevant material consideration in this instance. On balance, the provision of cycle storage complies with current guidance and is considered to be acceptable.

#### *Refuse storage / collection*

332. Details of refuse storage have been submitted, with each of the floor blocks (A-D) having a refuse store accommodating suitable levels of storage capacity within 1,100l bins, The nine houses would have their own pair of 240l refuse bins, with storage located to the rear of each house.
333. Refuse access for the southern residential units would be serviced from Chaplin Road. The location of Block's D refuse store is over 20m from the point where a refuse vehicle is shown to stand and for a refuse vehicle to get to within the required 10m of the store, it would need to reverse a short distance along the access road on the northern side of the site. This is not ideal in safety terms and a management strategy to relocate those bins closer to Block C on collection days could reasonably address this issue, although this has not been set out within the submitted DSP. A commitment to this should be set out in a revised DSP which can be secured via condition.

#### *Deliveries and Servicing*

334. The submitted DSP predicts around 16 vans, and one lorry would visit the site each day, spread out between 7am and 8pm. This level of activity does not give rise to highway concerns.
335. Swept path drawings have been produced demonstrating that a refuse vehicle, fire tender and servicing vehicle can safely manoeuvre within the site and enter and egress the public highway in a forward gear.

#### *Construction Logistics*

336. The submitted Construction Logistics Plan, rev03 (May 2026), sets out key transport-related matters to minimise impacts on the highway network and neighbours and ensure safe operation of vehicles during construction of the proposed development. This document shall be read in conjunction with the submitted CMP (referred to previously).
337. Primary access is proposed via Fairview Avenue once enabling works are complete and vehicle movements through this access would be controlled by traffic marshals / gatesmen. Vehicles can load / unload from within the site, with sufficient space to enter and exit in forward gear. Segregated walkways and access are to be provided for pedestrians.
338. Limited parking opportunities would exist on site during the build period, with no parking provided for operatives.
339. The CLP, rev03 anticipates the construction programme to span a period of 27 months and predicts that the peak period of construction (substructure) activity would generate about 40 construction vehicle trips per day and 1,000 per month. Deliveries would be pre-booked 48 hours in advance (with a requirement to phone ahead 30mins before arrival to avoid any backing up outside of the site) and deliveries are expected to take place between 9.30am-3pm, as there are schools in the vicinity of the site. For time critical deliveries (i.e. concrete) these would be limited during the school opening and closing hours, though it is appreciated this may be unavoidable at certain times of the project. Deliveries would be avoided within four hours of any event at Wembley Stadium, and all deliveries are to be marshalled by the gatesmen. The revised routing plan is considered acceptable

340. Wheel washing facilities are indicated on the Traffic Management Plan (Appendix J of the CLP, rev03), together with traffic routes around the site and areas for loading, unloading and storage.
341. The CLP, rev03 sets out a proportionate strategy for controlling and managing construction impacts on the highway network and ensuring safety. There are no objections on Transport grounds, subject to the detailed CLP, rev 03 (May 2026) being secured through condition.

#### *Active Travel Zone, and Healthy Streets Assessment*

342. An Active Travel Zone (ATZ) assessment has been included within the TA, carried out in line with TfL guidance, in order to assess the quality of pedestrian and cycle links from the development site to nine points of interests, including stations, schools, shops and parks. This is to assess how future users of the site would be able to make key journeys from the site to support car-free lifestyles.
343. This assessment did not identify significant concerns but did highlight the potential for relatively minor improvements to the public realm, such as improved visual elements such as planting, seating, bins, lighting and signing. It is also noted that Chaplin Road is well used by both pedestrians and vehicles but does not provide a very pedestrian friendly environment. Noting the identified potential for improvements to be made, a financial contribution of £20,000 has been agreed, which would be secured through the s106 legal agreement.
344. Within the site itself it is important that Fairview Walk is safeguarded from vehicle movements, so that this provides a welcome traffic-free central space. Robust measures would need to be put in place to prevent unauthorised vehicle access but still allow any access that may be required for emergency vehicles (i.e. removable bollards), further details of which shall be secured through condition.

#### *Trip generation*

345. The national industry standard TRICS database has been used to estimate likely trips to and from the site by all modes of transport, based on comparisons with other comparative surveyed sites.
346. A total of twelve sites were selected, and this predicted 69 two-way trips in the am peak (8-9am) and 62 two-way trips in the pm peak (5-6pm). These trips were then broken down using 2021 Census data to determine the mode share. Transport officers have carried out a sensitivity test using 2011 Census data and this showed a higher proportion of car trips and a lower proportion of bus use, so the 2021 findings are considered appropriate.
347. In terms of car trips, 11% of trips have been estimated to be made by car drivers, which amounts to 6-7 two-way trips in each peak hour. This level of traffic movement is not considered to be significant enough to have a noticeable impact on the local road network.
348. The trip generation assessment is also predicted to result in an additional 21 and 19 two-way bus trips in the morning and evening peak hours respectively, with 19 and 21 rail trips predicted. This is an average of less than one additional passenger per bus and about one additional passenger per train passing close to the site, so is not significant enough to have a noticeable impact on public transport loadings.

#### *Travel Plan*

349. To help to manage travel movements by residents, a Framework Travel Plan (FTP) has been submitted with the application, to be overseen by a Travel Plan Co-ordinator (to be appointed by the developer at a later date, but must be prior to any sales process commencing) who would have a role to play in promoting the travel options that would be offered to residents of the development.
350. Measures set out in the FTP to increase non-car modes of travel aren't considered ambitious enough at this stage, therefore, a revised Travel Plan is required to be submitted for approval, and this is to be secured through the s106 legal agreement.
351. In terms of monitoring of the effectiveness of any Travel Plan, surveys are proposed to be undertaken at year one year, three and five years after occupation.
352. In summary, the low level of parking provision proposed on site is acceptable in this location and

adequate cycle parking provision would be made, together with appropriate arrangements for deliveries and servicing to be undertaken without affecting the flow of traffic on the local highway network, and other managed arrangements for within the site itself in order to minimise movement within the site at the expense of the new public realm and amenity areas. Subject to the conditions and planning obligations recommended, including any financial contributions requested being secured through the s106 agreement, the proposal is acceptable in transport terms.

### **Employment, Skills & Training**

353. London Plan policy E11 states that development proposals should support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate.
354. Brent Local Plan policy BE1 also supports such opportunities being provided through new developments and 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. Brent's Planning Obligations SPD also seeks to maximise employment and skills opportunities through new development, for the borough's residents.
355. As required by policy, the development would secure an Employment and Training Plan for the provision of training, skills and employment initiatives for residents of the borough, relating to the construction phase, estimated at this time to be a minimum of ten full-time construction phase jobs, 50% of which to be secured as apprenticeships for Brent residents. This Plan, along with associated support fees would be secured as s106 obligations, as set out in the draft Heads of Terms, and would be a benefit of the proposals afforded positive weight in the overall planning balance.

### **Phasing of development**

356. This would be a phased development, consisting of a demolition and enabling phase (Phase 1), followed by the construction phase (Phase 2). A Phasing Plan has been proposed, and this would be further secured by condition.

### **Equalities**

357. 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).

### **Planning balance**

358. 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. In this case the proposal has been assessed against relevant policies of the Development Plan and the NPPF.
359. The proposal would deliver several benefits (encompassing economic, social and environmental benefits), some of which attract greater weight than others. These material considerations weigh in favour of the development, and are balanced against the planning harm identified, in undertaking a planning balance judgement.
360. The provision of a significant quantum of new homes (including 10% accessible homes and 26 family sized homes) contributes to increasing London's (and Brent's) housing supply and providing a choice of different types of homes. This would positively contribute towards meeting London's housing need and Brent's local housing need, including locally, the more acute need for family sized accommodation and affordable homes. The provision of 11 affordable (LAR) homes is proposed at a level that exceeds the maximum reasonable level that the scheme can viably support. These benefits in relation to increased housing delivery and the different type of homes proposed are afforded significant weight, particularly in the context of the local and London wide need for more homes.
361. Redevelopment of the site, a currently underutilised and long-term vacant brownfield site,

resulting in the efficient use of land in a sustainable location, represents a benefit.

362. The development would deliver a new permissive pedestrian route connecting Chaplin Road and Fairview Avenue, enhancing permeability in the locality. This would be a public benefit to the local community, along with the character and appearance of the local area.
363. Alongside the retention of existing mature trees on the Chaplin Road frontage, a significant net increase in trees (and canopy cover) across the site would be delivered, enhanced urban greening (factor of 0.4) and a net gain in biodiversity (above than the mandatory 10% requirement). Additionally, a contribution to enhance off site play space / open space in the locality shall be secured. All of which represent social and environmental benefits that weigh in favour of the development.
364. Economic benefits would follow in terms of new employment because of development, during the construction phases, and this is to be captured through s106 legal agreement. Indirect economic benefits would be expected to follow because of increased local expenditure in the local economy (during construction and future occupation). The proposal would also secure money for Brent and Mayoral Community Infrastructure Levy (CIL), estimated to be c.£3.5m. These economic benefits further weigh in favour of development.
365. Reduced surface water flood risk across the site would follow through the SuDS strategy proposed, representing a betterment over current unattenuated discharge rates.
366. Proposed buildings of high-quality design would positively contribute to enhancing the local character. These represent environmental and social benefits that weigh in favour of development.
367. The proposed redevelopment of the site performs strongly against the Development Plan when assessed as a whole. It would deliver the comprehensive redevelopment of a long-term vacant brownfield site that is allocated for housing, providing 108 new homes including affordable housing, family-sized accommodation, significant public realm improvements, biodiversity enhancements, a new publicly accessible pedestrian connection, and investment that would support improvements to the retained healthcare estate. The proposal would also make efficient use of land in a sustainable location and would deliver a high-quality residential environment for future occupiers.
368. It is acknowledged that the proposal is not without some adverse impacts. The report identifies limited areas where the proposal does not fully align with all aspects of Development Plan policy, including in relation to social infrastructure policy requirements and the proportion of family-sized housing, and these issues have been balanced in this recommendation. In addition, some localised impacts to neighbouring residential amenity would arise, including reduced daylight, outlook and privacy in certain instances. However, these effects are limited in extent, have been carefully assessed, and are not considered to result in unacceptable living conditions for neighbouring occupiers.
369. Temporary impacts associated with demolition and construction activities, including noise and disturbance, would also occur. These impacts are an inevitable consequence of redevelopment but would be time-limited in nature and subject to a comprehensive package of mitigation measures secured through planning conditions and approved management plans.
370. Taking all matters into account, the identified harms attract moderate weight in the planning balance but are significantly outweighed by the substantial public benefits arising from the redevelopment of the site.
371. The proposed demolition would result in harm to a non-designated heritage asset (Old Wembley Hospital), through the total loss of the buildings. This loss is considered to be outweighed by the range of identified public benefits, in accordance with paragraph 216 of the NPPF, as discussed above.
372. Whilst these adverse impacts carry weight, they are not considered to be unduly harmful, when considered as part of the overall development and the significant planning gain it would represent. In contrast the proposed development would deliver clear and important benefits, as mentioned, most notably in terms of housing delivery (including affordable housing and family sized homes), improved pedestrian connectivity, economic activity and regenerating a long-term vacant and underutilised site which would enhance local character.
373. Having regard to the provisions of the Development Plan as a whole, and taking account of all material considerations, it is considered the benefits of the development clearly and demonstrably

outweigh the adverse effects identified.

## Conclusion

374. The proposed development would make efficient use of the land, a previously developed brownfield site, for the delivery of new homes, in a sustainable location, which is in line with the national Framework, regional and local planning policy. The proposed use of land that has been identified by the NHS as surplus to its requirements, for residential development, is consistent with the overarching aims of site allocation policy BSWSA 13. The conflict with Local Plan policy BSI1 identified, relating to the loss of existing buildings has been satisfactorily justified, on balance, and this conflict has been considered in the overall planning balance exercise.
375. The provision of 108 new homes positively contributes towards meeting the identified strategic London wide need for housing. It would also contribute towards housing targets within the borough and deliver much needed affordable housing at a level in excess of the maximum reasonable amount. The design approach is suitable, and of high quality, meeting the requirements of Local Plan design-related policies.
376. Harm has been identified to a non-designated heritage asset, which as the report acknowledges, is found to be outweighed by the range of benefits overall. Owing to the existing baseline conditions on site there would be some change to prevailing conditions and as relevant supporting technical assessments identify there is expected to be some adverse effects in relation to neighbouring residential amenity, namely to privacy, outlook and daylight conditions. These adverse effects would be noticeable in some cases, and isolated, but adverse effects are to be expected in an urban location such as this where development is proposed which is seeking to make most efficient use of the site.
377. The scheme would include parking on site that is significantly below maximum parking standards. This would help ensure the development is sustainable, and that it promotes non-car modes of active travel. The proposed Fairview Walk would help to encourage more pedestrian movement and improved connectivity.
378. Post development, a measurable net gain in biodiversity and enhanced urban greening factor would be achieved, alongside a significant net increase in the number of trees and the most important existing trees on site are being retained.
379. The energy strategy demonstrates that development exceeds the GLA guidance target of 35% regulated CO2 emissions reductions, this, combined with a carbon offset contribution would help to achieve net zero. This combined with the wider sustainability strategy measures, including the SuDS strategy and betterment in terms of surface water run off rates would be a benefit.
380. For the reasons set out above, the proposed development is considered to constitute sustainable development (delivering social, economic and environmental benefits), and taking the Development Plan as a whole, the proposal is considered to sufficiently accord with the Development Plan, Having had regard to all material planning considerations, including the objections received, the identified harm does not significantly and demonstrably outweigh the identified range of public benefits and the proposal is therefore recommended for approval, subject to conditions and completion of a satisfactory Section 106 legal agreement.



Application No: **26/0225**

To: Mr Clark  
Fairview New Homes Ltd  
50 Lancaster Road  
Enfield  
Middlesex  
EN2 0BY

I refer to your application dated **02/02/2026** proposing the following:

Demolition of existing buildings to provide within buildings of between 3 and 6 storeys, 108 residential units (Use Class C3) and car parking spaces together with associated public realm, landscaping and highway improvements, cycle parking and stores, and all other associated and ancillary works.

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

at **Brent NHS Primary Care Trust, Wembley Centre For Health & Care, 116 Chaplin Road, Wembley, HA0 4UZ**

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: 24/06/2026

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 drawing(s) and/or document(s):

Existing Site Information

3628-STO-XX-XX-PL-A-91001  
3628-STO-XX-XX-PL-A-91002  
3628-STO-XX-XX-PL-A-91003  
3628-STO-XX-XX-PL-A-91005

Proposed Site Information

3628-STO-XX-XX-PL-A-91004 P01  
3628-STO-XX-XX-PL-A-20001 P01  
3628-STO-XX-XX-PL-A-20002 P01  
3628-STO-XX-XX-PL-A-20003 P01  
3628-STO-ZZ-00-PL-A-20100 P02  
3628-STO-ZZ-01-PL-A-20101 P02  
3628-STO-ZZ-02-PL-A-20102 P02  
3628-STO-ZZ-03-PL-A-20103 P01  
3628-STO-ZZ-04-PL-A-20104 P01  
3628-STO-ZZ-05-PL-A-20105 P01  
3628-STO-ZZ-06-PL-A-20106 P01

Flat Types

3628-STO-A0-ZZ-PL-A-20701  
3628-STO-A0-ZZ-PL-A-20702  
3628-STO-A0-ZZ-PL-A-20703  
3628-STO-A0-ZZ-PL-A-20704  
3628-STO-A0-ZZ-PL-A-20705  
3628-STO-A0-ZZ-PL-A-20706  
3628-STO-A0-ZZ-PL-A-20707

3628-STO-B0-ZZ-PL-A-20701  
3628-STO-B0-ZZ-PL-A-20702  
3628-STO-B0-ZZ-PL-A-20703  
3628-STO-B0-ZZ-PL-A-20704  
3628-STO-B0-ZZ-PL-A-20705  
3628-STO-B0-ZZ-PL-A-20706  
3628-STO-B0-ZZ-PL-A-20707  
3628-STO-B0-ZZ-PL-A-20708  
3628-STO-B0-ZZ-PL-A-20709  
3628-STO-B0-ZZ-PL-A-20710  
3628-STO-B0-ZZ-PL-A-20711

3628-STO-B0-ZZ-PL-A-20712  
3628-STO-B0-ZZ-PL-A-20713

3628-STO-C0-ZZ-PL-A-20701  
3628-STO-C0-ZZ-PL-A-20702  
3628-STO-C0-ZZ-PL-A-20703  
3628-STO-C0-ZZ-PL-A-20704

3628-STO-D0-ZZ-PL-A-20701  
3628-STO-D0-ZZ-PL-A-20702  
3628-STO-D0-ZZ-PL-A-20703  
3628-STO-D0-ZZ-PL-A-20704  
3628-STO-D0-ZZ-PL-A-20705  
3628-STO-D0-ZZ-PL-A-20706  
3628-STO-D0-ZZ-PL-A-20707  
3628-STO-D0-ZZ-PL-A-20708  
3628-STO-XX-ZZ-PL-A-20705  
3628-STO-XX-ZZ-PL-A-20706

#### Elevations & Sections

3628-STO-ZZ-EX-PL-A-20201 P01  
3628-STO-ZZ-EX-PL-A-20202 P01  
3628-STO-ZZ-EX-PL-A-20203 P01  
3628-STO-ZZ-EX-PL-A-20204

#### Bay Studies

3628-STO-XX-EX-PL-A-20401  
3628-STO-XX-EX-PL-A-20402  
3628-STO-XX-EX-PL-A-20403  
3628-STO-XX-EX-PL-A-20404  
3628-STO-XX-EX-PL-A-20405 P01  
3628-STO-XX-EX-PL-A-20406

#### Landscape Drawings

24.037-BOSK-XX-00-DR-L-1000 P15  
24.037-BOSK-XX-ZZ-DR-L-1001 P05

#### Trees Survey and Protection Plans

2393-KC-XX-YTREE-TCP01RevA  
2393-KC-XX-YTREE-TPP01RevB

#### Phasing Plan

3628-STO-ZZ-RF-PL-A-20106 P01 FNH

#### Supporting Documents:

Air Quality Assessment by Quantum Air, 15 December 2025  
Arboricultural Method Statement RevA by Keen Consultants, 27 May 2026  
Biodiversity Net Gain Assessment by Red Ecology, May 2026  
Biodiversity Net Gain Metric by Red Ecology, 26 May 2026  
Construction Logistics Plan rev03 by Fairview New Homes, May 2026  
Construction Management Plan rev03 by Fairview New Homes, May 2026  
Ecological Assessment (Red Ecology, ref. 1049.EcAs.Draft.03, dated January 2025),  
Energy Statement by Jostec, 7 January 2026  
Fire Safety Strategy by Ashton Fire, 5 December 2025  
Flood Risk and Drainage Strategy Report by Robert West, December 2025  
Landscape Strategy (Studio Bosk, May 2026)  
Written Scheme of Investigation for Building Recording by Icení Projects, May 2026  
Level 2 Building Recording by Icení, June 2026  
Noise Impact Assessment by Quantum Acoustics, 15 December 2025  
Transport Assessment, rev B, December 2025  
Tree Survey and Impact Assessment RevA by Keen Consultants, 8 December 2025

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

- 3 The scheme hereby approved shall contain 108 residential dwellings within Use Class C3 as detailed in the drawings hereby approved, unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of proper planning.

- 4 The building(s) 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:** To promote water conservation and efficiency measures in all new developments in accordance with Policy SI5 of the London Plan.

- 5 All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up to date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register at <https://nrmm.london/>.

Reason: To protect local amenity and air quality in accordance with Brent Policies BSUI1, BSUI2 and London Plan Policy SI1.

- 6 The development hereby approved shall not be occupied unless the cycle storage and refuse stores have been completed in full accordance with the approved drawings and made available to residents of the development and shall not be used other than for purposes ancillary to the dwellings hereby approved unless alternative cycle/and or refuse storage details are submitted to and approved in writing by the Local Planning Authority, and the development thereafter completed and maintained in accordance with those details.

Reason: To ensure a satisfactory standard of accommodation.

- 7 The development hereby approved shall be built so that no less than 90% of the residential units achieve Building Regulations requirement M4(2) – 'accessible and adaptable dwellings' and the remaining to be built in accordance M4(3) – 'wheelchair user dwellings', unless otherwise agreed with the Local Planning Authority.

Reason: To ensure that the development achieves an inclusive design in accordance with London Plan Policy D7.

- 8 The rating level of the noise emitted from fixed plant(s) on the site shall be 10dB(A) below the existing background level at any time with the noise levels measured at the nearest noise sensitive receptors. The measurements and assessments of the expected noise levels shall be carried out in accordance with BS4142:2019. Should any mitigation measures be necessary to achieve the above required noise levels these details shall be submitted to the Local Planning Authority in writing for approval. The plant shall thereafter be installed and maintained in accordance with the approved details.

The fixed plant(s) shall not be operational until the noise attenuation measures (if required) for the plant(s) have been fully installed and shall be retained thereafter for the lifetime of the development.

Reason: To safeguard the amenities of the adjoining premises and the area generally and to

comply with Policies D6 Housing quality and standards and D14 Noise of the London Plan (2021).

- 9 Prior to the first occupation of any of the residential units hereby consented, the sustainable drainage scheme shall be completed in full accordance with Section 5 of the Flood Risk Assessment and Drainage Strategy Report (Robert West, December 2025, issue P02) and shall be retained, maintained and managed thereafter for the lifetime of the development in accordance with the Drainage Maintenance Schedule, Appendix J, dated 05/12/2025, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To prevent the increased risk of flooding, ensure the sustainable management of surface water, improve water quality, and ensure the long-term viability and maintenance of the drainage system in line with environmental and flood prevention policies.

- 10 The development hereby approved shall be implemented in full accordance with the details stipulated within the approved Construction Management Plan Rev03 (Fairview New Homes, May 2026), unless alternative details are agreed in writing with the Local Planning Authority.

Reason: In order that the local planning authority may be satisfied that the demolition and construction process is carried out in a manner which will minimise possible noise, disturbance, pollution and disruption to neighbouring properties, the surrounding transport network and the local environment and to comply with Policy S11 Improving air quality and Policy T7 Deliveries, servicing and construction of the London Plan (2021).

- 11 The development hereby approved shall be implemented in full accordance with the details stipulated within the approved Construction Logistics Plan Rev03 (Fairview New Homes, May 2026), unless alternative details are agreed in writing with the Local Planning Authority.

Reason: In order that the local planning authority may be satisfied that the demolition and construction process is carried out in a manner which will minimise possible noise, disturbance, pollution and disruption to neighbouring properties, the surrounding transport network and the local environment and to comply with Policy S11 Improving air quality and Policy T7 Deliveries, servicing and construction of the London Plan (2021).

- 12 The development hereby approved shall achieve an Urban Greening Factor target score of 0.40 in full accordance with Section 3.10 of the Landscape Strategy (Studio Bosk, May 2026) and measures to achieve this shall be fully implemented prior to the first occupation of any of the residential units hereby consented and maintained as such thereafter.

Reason: To comply with Policy G5 Urban greening of the London Plan (March 2021) and Brent Local Plan policy BGI1.

- 13 The development hereby approved shall be implemented in full accordance with the details stipulated within the approved Arboricultural Method Statement, revA (Keen Consultants, 27 May 2026), and Tree Protection Plan 2393-KC-XX-YTREE-TPP01RevB, unless alternative details are submitted to and agreed in writing with the Local Planning Authority, and the scheme is thereafter implemented in accordance with the alternative measures.

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 Local Plan policies DMP1 and BGI 2.

- 14 In accordance with the Transport Assessment, rev B, December 2025, all on-site parking spaces shall be provided with active electric charging facilities from the outset, and thereafter permanently retained and maintained as such, unless otherwise agreed in writing by the Local

Planning Authority.

**Reason:** To encourage the uptake of electric vehicles as part of the aims of London Plan policy T6.1.

- 15 The development hereby approved shall be carried out in two phases and in accordance with Phasing Plan 3628-STO-ZZ-RF-PL-A-20106 P01 FNH, unless otherwise agreed in writing by the Local Planning Authority:

- Phase 1: demolition and enabling
- Phase 2: commencement

Each phase constitutes a separate phase of the development for the purposes of Community Infrastructure Levy Regulations.

**Reason:** To ensure coordination between the phasing plan as approved and the triggers in any relevant agreement made under Section 106 of the Town and Country Planning Act 1990 (as amended) and to define the extent of a CIL phase for the purposes of the CIL Regulations 2010 as amended.

- 16 The development hereby approved shall not be occupied unless the external amenity spaces have been completed in full accordance with the approved drawings (including any details approved through a discharge of condition) and those spaces shall thereafter be made available to residents of the development and shall not be used other than for purposes ancillary to the dwellings hereby approved.

**Reason:** To ensure a satisfactory standard of accommodation.

- 17 Within three months of commencement of the development (excluding demolition and enabling works), the developer shall enter into an agreement with the Local Highways Authority to carry out the following works:

- i. Remove all redundant crossovers and the redundant zig-zag marking on Chaplin Road; *and*
- ii Extend the full-height kerbed footway and parking bays on Chaplin Road

All works to be undertaken at the developer's expense, and the development shall not be occupied until evidence that the abovementioned highway works have been implemented in full and certified as completed to an acceptable standard by the Local Highways Authority has been submitted to and approved in writing by the Local Planning Authority.

**Reason:** To ensure the development provides a safe and functional highway environment to connect the development with its surroundings.

- 18 No further extensions or buildings shall be constructed within the curtilage of the dwellinghouse(s) subject of this application and numbered 100-108 on the plans hereby approved, notwithstanding the provisions of Class(es) A, B, C, D & E of Part 1 Schedule 2 of the Town & Country Planning (General Permitted Development) Order 1995, 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:** To prevent an over development of the site and undue loss of amenity to adjoining occupiers.

- 19 (a) Prior to the commencement of any building works on site (excluding demolition and site setup/preparation works), a site investigation report for that phase shall be carried out by competent persons to determine the nature and extent of any soil contamination. The investigation shall be carried out in accordance with the principles of BS 10175:2011 + A2:2017 and the Environment Agency's current Land Contamination Risk Management Guidance. A report shall be submitted to and approved in writing by the Local Planning Authority, that includes the results of any research and analysis undertaken as well as an assessment of the risk posed by any identified contamination. It shall include an appraisal of remediation options should any contamination be found that presents an unacceptable

risk to any identified receptors.

- (b) Any soil contamination remediation measures required by the Local Planning Authority shall be carried out in full accordance with (a) above. A verification report shall be submitted to and approved in writing by the Local Planning Authority prior to first occupation of the development, stating that remediation has been carried out in full accordance with the approved remediation scheme and the site is suitable for end use (unless the Local Planning Authority has previously confirmed that no remediation measures are required).

**Reason:** To ensure the development can be implemented and occupied with adequate regard for environmental and public safety in accordance with the National Planning Policy Framework (2024) and relevant development plan policies.

- 20 No piling or any other foundation works (“the works”) using penetrative methods shall commence until a Piling Method Statement has been submitted to and approved in writing by the Local Planning Authority, in consultation with Thames Water, including the following details:
- i. Details specifying the depth, type, and method of piling, including the foundation design and the methodology for the proposed works
  - ii. A comprehensive programme of works, outlining the measures to prevent and minimise the risk of damage to subsurface sewerage infrastructure, groundwater
  - iii. Piling Layout Plan, including all Thames Water wastewater assets
  - iv. The local topography and clearance between the face of the pile to the face of a pipe

The piling or any other foundation works shall be carried out in full accordance with the approved details, unless alternative details are submitted to and approved in writing by the Local Planning Authority, in consultation with Thames Water.

**Reason:** To safeguard subsurface sewerage infrastructure, groundwater, and nearby structures from potential damage during piling and foundation works, to minimize the risk of environmental harm, and to ensure that the proposed methods comply with relevant safety and environmental standards.

- 21 Prior to the commencement of the above ground works, a detailed schedule, inclusive of appropriately scaled drawings and sections of all external finishes are submitted to and approved in writing by the Local Planning Authority. Such details shall include:
- (i) Parapets and roof junctions, including coping, fascia, soffit, eaves and brise soleil details;
  - (ii) Windows, entrance and external doors (including frame, cills, headers, opening method and glazing, reveals, lintels and access controls);
  - (iii) Projecting brick pattern
  - (iv) Balconies and balustrades, including material, fixings, and design;
  - (v) Rainwater goods (e.g. gutters, downpipes, hoppers);
  - (vi) Canopies, porches, and other entrance detailing;
  - (vii) Ventilation grilles or extract systems (visible on external façade);
  - (viii) Solar panels or other renewable features; and
  - (ix) Boundary treatments

The development shall be completed in full accordance with the approved details and shall be retained thereafter for the lifetime of the development.

**Reason:** To ensure that the high design quality demonstrated in the plans and submission is delivered so that local planning authority may be satisfied as to the external appearance of the building(s).

- 22 A detailed schedule of all external facing materials including details of manufacturing specification shall be submitted to and approved in writing by the Local Planning Authority (LPA) prior to commencement of the above ground works. This should be accompanied by coded and annotated elevations for reference. A physical sample panel ('mock-up') of the proposed external wall construction, showcasing the final materials, jointing and colour, shall be constructed on-site. The sample panel shall:
1. Be constructed to a 1:1 scale (full size).
  2. Represent a minimum area of 2 square meters (or other size specified by the LPA/applicant and agreed upon).
  3. Include a representative sample of all bricks, mortar/pointing, mastic movement joints and other feature brickwork and masonry banding

The development shall be carried out in accordance with the approved materials details, and thereafter maintained as such, unless alternative details are first agreed in writing by the Local Planning Authority.

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

- 23 (a) Prior to commencement of any above ground works a scheme of sound insulation against external noise, in accordance with the approved Noise Impact Assessment (Quantum Acoustics, 15 December 2025) shall be submitted to and approved in writing by the Local Planning Authority. The sound insulation scheme shall comprise a report prepared by a qualified acoustic professional detailing:
- (i) the acoustic protection for habitable rooms against noise to achieve sound levels of (1) 35 dB LAeq in living rooms and bedrooms (07:00 hours to 23:00 hours) with windows closed; and (2) 30 dB LAeq in bedrooms (23:00 hours to 07:00 hours) with windows closed.
  - (ii) Where the levels in (i) cannot be met with windows open appropriate acoustic ventilation should be provided so that the room can be sufficiently ventilated. The acoustic performance of any passive vent, variable speed mechanical air supply unit or whole house ventilation must be sufficient to ensure that the noise level standards given above are not compromised.
- (b) Following the installation of the sound insulation approved by part (a) and prior to the first occupation of the development, a report documenting the testing of the sound insulation, to be undertaken by a qualified independent acoustic professional, demonstrating compliance with the noise levels specified within the report approved by part (a), shall be submitted to and approved in writing by the Local Planning Authority. The scheme of sound insulation shall be retained thereafter for the lifetime of the development.

**Reason:** To safeguard the amenities of the occupiers of the proposed dwellings and to comply with Policies D6 Housing quality and standards, D13 Agent of Change, and D14 Noise of the London Plan (2021).

- 24 Prior to the commencement of any above ground works, full details of any plant that 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.

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 the Local Planning Authority in writing for approval. The plant shall thereafter be installed and maintained in accordance with the approved details

Reason: To protect acceptable local noise levels.

- 25 Prior to commencement of any above ground works, a photovoltaic (PV) strategy demonstrating compliance with the approved Energy Statement (Jostec, 7 January 2026) shall be submitted to and approved in writing by the Local Planning Authority.

The approved PV provision shall be installed, retained and maintained thereafter in accordance with the approved Strategy for the lifetime of the development, unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of sustainable development and to maximise on site carbon dioxide savings in accordance with policies contained in the London Plan (2021) and Brent's Local Plan.

- 26 Prior to commencement of any above ground works, final details of the number and location of the wildlife enhancement measures, in accordance with the recommendations of the Ecological Assessment (Red Ecology, ref. 1049.EcAs.Draft.03, dated January 2025), shall be submitted to and approved in writing by the Local Planning Authority. The details shall include but are not limited to:

- (i) No less than 3 integrated bat bricks
- (ii) No less than 6 integrated bird bricks
- (iii) No less than 15 features for invertebrates for shade and sunny locations

The development shall be carried out in accordance with the approved details prior to the occupation of the development and shall be maintained as such for the lifetime of the development, unless otherwise agreed in writing by the Local Planning Authority.

**Reason:** To comply with Policy G6 Biodiversity and access to nature of the London Plan (2021).

- 27 Prior to completion of the superstructure, final details of the soft landscaping to accord with dwgs. 24.037-BOSK-XX-00-DR-L-1000 P15, 24.037-BOSK-XX-ZZ-DR-L-1000 P05, Landscape Strategy (Studio Bosk, May 2026), shall be submitted to and approved in writing by the Local Planning Authority. The details shall include:

- i.—Ground modelling showing both existing and proposed contours/levels;
- ii. All boundary treatments, means of enclosure and retaining structures (including finished heights);
- iii. All areas of defensible space for dwellings at ground floor level;
- iv. Existing and proposed functional services above and below ground (e.g. drainage, power, communications, shared ducting provision, indicating alignments, levels, access points, supports as relevant, lighting, CCTV);
- v. Water features;
- vi. Details of soft landscaping works to include, planting plan, written specifications (including cultivation and other operations associated with grass and plant establishment), and schedules of plants noting species, plant supply sizes and proposed numbers/densities;
- vii. Tree pit design;
- viii. Specification of green/biodiverse roofs, with cross-section / build up details and future maintenance regime;
- ix. Details of long-term management and maintenance regime for the five years following planting, and beyond, for all areas of communal amenity and areas of public realm, demonstrating how the landscape and biodiversity design objectives are delivered in line with the Habitat Management and Maintenance Plan and Biodiversity Net Gain plan as approved..

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. Any new tree(s)

that die(s), are/is removed or become(s) severely damaged or diseased shall be replaced and any new planting (other than trees) which dies, is removed, becomes severely damaged or diseased within five years of planting shall be replaced, unless further specific permission has been given by the Local, replacement planting shall be in accordance with the approved details.

All landscaping shall be carried out in the first planting and seeding season following the completion of the development, all planting, seeding and turfing shall be undertaken in accordance with the details approved and retained thereafter, unless otherwise agreed in writing by the Local Planning Authority.

**Reason:** To secure high-quality landscaping and biodiversity enhancements, in accordance with Brent's Local Plan policies DMP1 and BGI 2

28 Prior to completion of the superstructure further details of hard landscaping shall be submitted to and approved in writing by the Local Planning Authority, and shall include:

- (i) Detailed schedule of the hard surfaces for any part of the site not occupied by buildings, including all roadways and pathways.
- (i) Samples (where requested) and/or manufacturer's literature of materials
- (ii) The permeability of the hard surfaces and their sub-base.
- (i) Appropriate sustainable urban drainage measures where applicable.
- (i) Existing and proposed contour levels
- (i) Other equipment and structures, including street furniture, seating, bins, cycle parking infrastructure, play features, and use of bollards to restrict vehicle access to parts of the site;
- (ii) CCTV locations
- (iii) And any other associated features, furniture and/or apparatus; and
- (i) Details of long-term management and maintenance regime for all communal amenity areas and areas of public realm

Prior to the first occupation of the development, the works shall be completed in full accordance with the approved details and shall be retained thereafter for the lifetime of the development in accordance with (ix), unless alternative details are submitted to and approved in writing by the Local Planning Authority

**Reason:** To secure high quality landscaping in accordance with Brent Local Plan policies.

29 Prior to completion of the superstructure details of the children's play space strategy shall be submitted to and approved in writing by the Local Planning Authority.

The play space strategy shall provide the final location and area(s) in sqm of the play space features to be delivered across the site, manufacturer's specification and/or drawings of the surfacing and equipment to be installed and details of the surfacing, management and maintenance regime of the play space, and implementation programme.

The approved play space strategy shall be implemented in full prior to occupation and retained for the lifetime of the development in accordance with the approved management and maintenance regime, unless otherwise agreed in writing by the Local Planning Authority.

**Reason:** In the interests of residential amenity.

30 Prior to completion of the superstructure works details of the security measures to be incorporated into the development shall be submitted to and approved in writing by the Local Planning Authority that demonstrate that reasonable endeavours have been made to accommodate secure by design Silver Award principles in order to minimise the risk of crime and to meet the specific security needs of the development in accordance with the principles and objectives of Secured by Design.

The development shall be implemented in accordance with the approved security details prior to first occupation and maintained for the life of the development, unless otherwise agreed in

writing by the Local Planning Authority.

Reason: To ensure that the development maintains and enhances community safety in accordance with Policy DMP1 of the Local Plan.

- 31 Prior to completion of the external building envelope details of the introduction of an illustrated local history board(s) shall be submitted to and approved in writing by the Local Planning Authority, in consultation with the Council's Heritage Officer. Details of which shall include but is not limited to the following:

- (i) Description of the historical role Old Wembley Hospital played in the community, including its use during the Second World War;
- (i) Details of its founding and;
- (i) Identification of a suitable location(s) within the site where the board(s) can be installed where these can be easily viewed by the general public.

The historical boards(s) shall thereafter be installed in accordance with the approved details prior to first occupation of the development hereby approved and thereafter retained throughout the lifetime of the development, unless otherwise agreed in writing by the Local Planning Authority.

**Reason:** In the interest of local history.

- 32 Prior to the completion of the external building envelope, 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 (including lighting contour plan), as well as ecological sensitivity measures that form a part of the lighting strategy. Proposed lighting should adhere to guidance provided by the Institute of Lighting and the Bat Conservation Trust.

The lighting shall not be installed other than in accordance with the approved details, unless otherwise agreed in writing by the Local Planning Authority.

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

- 33 Prior to the first occupation of the development hereby approved, a revised Delivery, Servicing and Waste Management Plan (to include collection arrangements for block D and the semi-detached houses) shall be submitted to, and approved in writing, by the Local Planning Authority. The approved details shall be implemented in full thereafter and adhered to for the lifetime of the development, unless otherwise agreed in writing by the Local Planning Authority.

Reason: In order to reduce the impacts of servicing activity and ensure satisfactory vehicle management and to comply in compliance with Policy T7 of the London Plan (2021).

- 34 Prior to first occupation of the development hereby approved a revised Car Parking Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The details shall include;

- i. details to confirm only Blue Badge holders will be allocated permits for accessible parking bays;
- ii. how demand for accessible parking bays will be kept under review;
- iii. the process for allocation of permits and the duration of the permit;
- iv. Measures to be employed to enforce any unauthorised parking on site

The approved Plan shall be implemented in full thereafter and adhered to for the lifetime of the development thereafter, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure appropriate use, allocation and effective management of vehicle parking spaces on site, having regard to the car-free nature of the development

## INFORMATIVES

**1** - In relation to the soft landscaping condition (No.28)), the applicant is advised to maximise the use of larger canopied trees where this is suitable on site. This should be demonstrated when details are submitted to formally discharge this condition.

**2** - The applicants are reminded of hazards caused by asbestos materials especially during demolition and removal works and attention is drawn to the Asbestos Licensing Regulations 1983. Licensed Contractors only are permitted to remove asbestos which must be transferred to a licensed site. For further advice the Council's Chief Environmental Health Officer should be contacted.

**3** - In relation to Condition 31, it is encouraged that the naming of buildings/access routes on site be informed by the site's historical founding as a community hospital.

**4** - 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.

**5** - 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)

**6** - 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.

**7** - 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).

**8** - 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.

**9** - The removal of a crossover and road markings fronting Chaplin Road including the reinstatement of the public footpath shall be carried out by the Council as the Local Highway Authority at the applicant's expense. Such application should be made to the Council Highway Team. The grant of planning permission, whether by the Local Planning Authority or on appeal does not indicate that consent will be given under the Highways Act.

**10** - Brent Council supports the payment of the London Living Wage to all employees within the Borough. The developer and constructor are strongly encouraged to pay the London Living Wage to all employees associated with the demolition and construction of development.

**11** - The following highways licences may be required: crane licence, hoarding licence, on-street parking suspensions. The applicant must check and follow the processes and apply to the Highway Authority.

**12** - There are public sewers crossing or close to your development. If you're planning significant work near

Thames Water sewers, it's important that you minimise the risk of damage. You will need to check that your development doesn't limit repair or maintenance activities, or inhibit the services Thames Water provide in any other way. The applicant is advised to read the following guide working near or diverting Thames Water pipes.

[https://urldefense.com/v3/\\_\\_https://www.thameswater.co.uk/developers/larger-scaleddevelopments/planning-our-development/working-near-our-pipes\\_\\_;!!CVb4j\\_0G!T6NC5eyXTZ5yLsj4ltd7w-AcYfFUMfICqbzki4-huYcdolZHm3cLPtZwbOILcKdliWrJhapQ9p0uYvC8oxJ3aQOnl84IbLU\\$](https://urldefense.com/v3/__https://www.thameswater.co.uk/developers/larger-scaleddevelopments/planning-our-development/working-near-our-pipes__;!!CVb4j_0G!T6NC5eyXTZ5yLsj4ltd7w-AcYfFUMfICqbzki4-huYcdolZHm3cLPtZwbOILcKdliWrJhapQ9p0uYvC8oxJ3aQOnl84IbLU$)

**13** - There are potentially water mains running through or near to part of proposed development site. The applicant/developer will need to get in contact with Affinity Water Developer Services Team to discuss asset protection or diversionary measures. This can be done through the My Developments Portal (<https://affinitywater.custhelp.com/>) or [aw\\_developerservices@custhelp.com](mailto:aw_developerservices@custhelp.com).

The applicant is further advised to contact Affinity Water Developer Services as soon as possible regarding supply matters due to the increased demand for water in the area resulting from this development.

**14** - Where the developer/applicant proposes to discharge to a public sewer Thames Water advises that prior approval from Thames Water Developer Services will be required.

Any person wishing to inspect the above papers should contact Gary Murphy, Planning and Regeneration, Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ, Tel. No. 020 8937 3314

## COMMITTEE REPORT

Planning Committee on  
Item No  
Case Number

2 July, 2026  
05  
25/0810

## SITE INFORMATION

RECEIVED	19 March, 2025
WARD	Queensbury
PLANNING AREA	Brent Connects Kingsbury & Kenton
LOCATION	Kingsbury High School, Princes Avenue, London, NW9 9JR
PROPOSAL	Proposed construction of Multi Use Games Area (MUGA) Facility and cricket pitch and netting with fencing and lighting to the school.
PLAN NO'S	See condition 2.
LINK TO DOCUMENTS ASSOCIATED WITH THIS PLANNING APPLICATION	<p><b><u>When viewing this on an Electronic Device</u></b></p> <p>Please click on the link below to view <b>ALL</b> document associated to case  <a href="https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&amp;keyVal=DCAPR_172670">https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&amp;keyVal=DCAPR_172670</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 "25/0810" (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:

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

### Conditions


1. Three year commencement
2. In accordance with approved plans
3. Compliance with sustainable drainage measures
4. Compliance with tree protection measures
5. Compliance with travel plan measures
6. Implementation of relocated cricket practice facility
7. Compliance on measures relating to Great Crested Newts
8. Compliance on ecological measures during construction works
9. Compliance on cycle parking details
10. Restriction on hours of use including use of floodlights
11. Compliance with flood light specifications
12. Compliance on noise mitigation measures
13. Use of PA system
14. Compliance on cricket practice facility specifications
15. Compliance on playing surface measures for two MUGA pitches
16. Details to be provided on specification, finish and colour pitch for fencing, flood lighting, acoustic fencing, ball stop netting and Multi-Use Games Area (MUGA) surfaces
17. Details to be provided on soft landscaping
18. Details to be provided on Community Access Plan

### Informatives

As set out within the decision notice

That the Head of Planning and Development Services 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, informatives, 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

	<b>Planning Committee Map</b>
	Site address: Kingsbury High School, Princes Avenue, London, NW9 9JR
	© Crown copyright and database rights 2011 Ordnance Survey 100025260



This map is indicative only.

## PROPOSAL IN DETAIL

The development seeks the addition of a multi-use games area facility comprising two artificial sports pitches. The pitch to the west has been marked on the plans for football and the pitch on the east has been on the plans for hockey. The two artificial sport pitches combined will occupy a 126m x 102.5m section of the schools playing field on the southern side of the school site. Ancillary boundary fencing at a height of 4m and floodlights at a height of 15m are proposed for the two artificial sport pitches. A 2m acoustic fence is proposed along the eastern and southern sides of the eastern pitch

In addition, the proposals seeks to relocate the existing cricket practice facility, on part of the site used as a playing field and existing cricket pitch. Ball stop fencing at a height of 6m is proposed towards the western boundary, to serve the relocated cricket pitch.

### *Amendments since submission*

A number of amendments have been received, and a further consultation was carried out to cover the material changes. The amendments are summarised below:

- Movement of the football pitch further northwest, closer to the main school buildings.
- The size of the hockey pitch was reduced and pushed further to the northwest away from the boundary.
- Lighting controls.
- Acoustic fencing was added.
- An area of biodiversity grassland was added.
- Additionally, following comments from the local gas operator, the ball stop netting location was moved further away from the site boundary as not to fall over safeguarded land.

## EXISTING

The application site relates to Kingsbury High School together with its playing field, which is accessed from Princes Avenue. The playing field is on the southern part of the school site, immediately north of the Roe Green Park.

The playing field is defined as protected open space within the Local Plan. Whilst the site does not contain any designated heritage assets, Kingsbury High School, which sits to the north of the site, is considered to have some heritage value and considered to be a non-designated heritage asset. A protected pipeline also runs along the western edge of the application site.

To the south of the site is Roe Green Park. This is a locally listed park. The park also contains Kingsbury Manor House and the walled garden which is a Grade II Listed Building. Parts of the park are also designated as Grade 2 Site of Importance for Nature Conservation (SNIC).

The wider school site and playing field is close to the Roe Green Village Conservation Area, bounded to the east by Bacon Lane. To the west of the application site are residential properties on Grosvenor Crescent and Manor Close.

## 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 of relevant planning policies when making a decision on the application.

**Representations received:** 9 objections from nearby residential occupiers have been received to date. 43 comments of support have been received from multiple groups including parents of Kingsbury High School and wider sports groups. The contents of these representations are summarised in detail in the 'Consultation' section later in this report.

**Principle of development on a protected playing field:** The proposal would provide enhanced local sports facilities, which would serve the school, and would also be available for bookings for the use of the local community. The proposal is considered to represent appropriate development, which would enhance the

space for sporting uses and would retain the open character of the space. Sport England have confirmed that the proposal meets its exceptions test.

**The impact of the sports pitch, lighting and associated fencing on local residential amenities:** The sports pitches and ancillary fencing proposed are set within the site and due to their lightweight material, would not unduly harm the amenity of any neighbouring property in terms of loss of daylight, sunlight or an increased sense of enclosure. The existing and proposed soft landscaping around the site is substantial and would act as a significant level of suitable screening and would restrict visibility of the structure(s) from nearby local gardens. The proposed lighting is not considered to have an unduly detrimental impact on neighbouring properties due to the significant distance, meaning that the lux levels at the site boundary would be within acceptable parameters.. It is not considered that the pitches will unreasonably disrupt residents' amenities, with mitigation measures proposed, with any limited harm being offset by the benefits of the proposed development in providing enhanced sporting facilities for the existing school

**Heritage Impact:** Parkland vistas experienced by visitors to Roe Green Park would be affected to some degree. However, overall any harm to the setting of the nearby heritage assets would amount to no more than a modest level of less than substantial harm and the benefits of the development are considered to outweigh this harm.

**Highways and Transportation:** It is not considered that the proposal would materially affect local highways and parking capacities given that the community uses would take place during off-peak periods and with staggered arrival times associated with booked time slots. A travel plan is in place to work towards the reduction in car use for attending the site.

**Trees and Ecology:** The existing playing field has been identified as having negligible ecological value. Its replacement with an artificial pitch would result in some ecological harm. However, the submitted information demonstrates that the required biodiversity net gain can be achieved, and the necessary ecological enhancements can be secured by condition. Floodlighting would be controlled by condition to ensure limited harm to ecology.

**Environmental Health:** Environmental Health have reviewed the proposal and advised that there are no objections raised in relation to noise or light pollution. A condition is recommended to restrict the hours of use and to ensure an acoustic fence is installed with appropriate specification to ensure no undue impact on the amenity of nearby residential properties due to noise.

**Flooding and Local Drainage:** The sports pitches have been designed with an open graded sub base and proposed SuDs to restrict the rate of surface water run off to greenfield rates. This would form comprehensive infrastructure which has been shown to effectively prevent the pitch from providing any increase in the severity of contributing to local flood events.

**Fire safety:** A Fire Statement was submitted with the application, and the scheme would be subject to approval through the building regulations to ensure that all fire safety requirements are met. However, due to the nature of the development it is acknowledged that there is only a limited risk associated with fire safety.

## RELEVANT SITE HISTORY

No relevant planning history

## CONSULTATIONS

89 nearby properties, including Friends of Eton Grove Park and the Roe Green Village Residents Association were notified by letter of this proposal for a minimum of 21 days on 28/03/2025. A press notice was placed on 17/04/2025 and site notices were put up close to the site on 01/05/2025.

Following amended plans and accompanying supporting documents, a re-consultation was carried out on 16/01/2026 to include those originally consulted and any additional properties that had made a representation. A press notice was placed on 22/01/2026 and site notices were put up on 16/01/2026.

9 comments of objection were received from residents of the surrounding area across the two rounds of consultation.

The reasons for objection are summarised in the table below:

Comments of Objection	Officers Comments
<p>Inaccuracies in submitted material – Application form Inconsistent drawings and reports Opening hours differ Travel Plan / Transport statement</p>	<p>A number of the documents were updated during the course of the application, with a full public re-consultation following this to allow for any further comment/objection to be made.</p>
<p>Inadequacy of heritage statement Harm to setting of Conservation Area</p>	<p>The heritage statement was updated during the application. The impact to heritage assets is discussed within the Heritage Considerations section of this report.</p>
<p>Conflict with Kingsbury Green Neighbourhood Action Plan.</p>	<p>Acceptability in planning terms is determined by the proposal's adherence to local and national planning policies. The Kingsbury Green Neighbourhood Action Plan does not formally form part of the development plan.</p> <p>Nevertheless, the proposal incorporates the introduction of planting including 18 trees and new hedgerow on the boundary. A travel plan and sufficient cycle storage has been provided to encourage active travel where movements particularly in the evening may increase.</p> <p>The impact on biodiversity and active travel has been assessed within the report.</p>
<p>The application proposes a commercial venture.</p>	<p>The use of the artificial pitches and the cricket practice facility would be used by the school during school times. In addition, it could be used by the wider community out of school time with details to be secured through a community access plan. This is in line with the requirements in the Local Plan, and is also required by Sport England.</p> <p>It should be noted that the area in which the sports pitches are proposed can already be used outside of school hours as there are no planning controls prohibiting this.</p>
<p>Inappropriate opening hours.  Hours of use will cause disruption, anti-social behaviour including those linked to alcohol consumption, noise and impact on Conservation Area.</p>	<p>The opening hours have been reduced since the first submission, from 08:00-21:30 weekdays and 08:00-23:00 hours at weekends. Through the updated proposals, the latest time the pitches would be operational would now be 21:00, with floodlights switched off shortly thereafter.</p> <p>The application does not include facilities such as any hospitality provision beyond those reasonably incidental to the use of the school, and the use of any sound systems would be restricted by condition.</p>
<p>Impact on residential amenity; noise, light, traffic / air quality, loss of green space.</p>	<p>This is discussed within the report below.</p>
<p>Increase in traffic and congestion.  Undermines active travel.</p>	<p>This is discussed in the Transport and Highways Considerations section of this report.</p>
<p>Inaccurate assessment of availability of parking in the adjoining roads</p>	<p>The Council's most recent Parking Survey does not identify Princes Avenue as heavily parked at night. Nevertheless, it is not considered that this proposal would materially worsen the impact on the local highway network. This is discussed further in the Transport and Highways Considerations section of this report.</p>
<p>Concerns with lighting: • Lighting height misrepresented • Lighting impact on homes not modelled</p>	<p>Information in relation to lighting was updated during the course of the application.</p> <p>The impact of the lighting is discussed within the Heritage Considerations and Amenity Impact sections in the body of this</p>

<ul style="list-style-type: none"> <li>No contextual drawings or views provided</li> <li>Impact on setting of the Conservation Area / Locally Listed Park</li> </ul>	report.
<p>Concerns with ball catch fencing:</p> <ul style="list-style-type: none"> <li>Visually dominant and overbearing</li> <li>Out of keeping with the surrounding residential character</li> <li>Harmful to enjoyment of private garden space</li> <li>Likely to reduce daylight and affect the health of hedging</li> <li>Creating an oppressive sense of enclosure</li> <li>Height</li> </ul>	The fencing is discussed within the Siting and Appearance and Impact to Neighbouring Amenities sections of the report.
<p>Air quality assessment.</p> <p>Under estimates car trips.</p>	The proposal is considered to be air quality neutral. This is discussed further in the Air Quality section of this report.
<p>Inadequate Environmental protection</p> <ul style="list-style-type: none"> <li>No details relating to biodiversity net gain</li> <li>Light spill after 9pm</li> <li>Insufficient detail on great crested newts and bats</li> <li>Impacts on trees / hedges not clearly demonstrated</li> </ul>	This is discussed further in the Green Infrastructure section of the report.
<p>Scale of the development covering playing fields.</p> <p>Over-intensive and inappropriate form of development.</p>	<p>The replacement sports pitch will enhance the ability of this land to enable sporting and recreational uses which is currently waterlogged for a substantial period of the year. The works proposed support all weather play. This is further discussed in the Principle of development section of the report.</p> <p>The scale of the development is considered to be justified in relation to the demand from students and the benefits which it would provide to the school and wider community.</p>
<p>Drainage risks and surface water flooding.</p>	This is discussed in Flooding and Drainage Considerations section of this report.
<p>Management</p> <ul style="list-style-type: none"> <li>Late night noise levels</li> <li>Lack of management in relation to noise or the use</li> <li>Lack of security information provided</li> </ul>	A management plan would form part of the required community access plan, which would be secured by planning condition, and upon discharge would be reviewed by The Local Planning Authority in consultation with Sport England. Additionally, further controls are proposed to ensure suitable hours of operation and restrictions on any amplified sound in order to mitigate any potential harm on the amenity of any surrounding residential properties.
<p>Proximity and safety concerns – cricket balls.</p>	Ball catch fencing has been proposed along the boundary with Grosvenor Crescent and Manor Close to mitigate the risk of balls leaving the site.
<p>Inadequate level of neighbour consultations.</p>	The Local Planning Authority carried out its statutory duty to advertise the application in line with relevant statute, and allowed neighbours the opportunity to comment on the application in accordance with legislation and with the Council's adopted Statement of Community Involvement.

Concerns relating to the origins of support comments.	Any interested party who may be affected by a planning application is welcome to submit comments, objections or letters of support.
Artificial pitches are linked to health conditions as a result of toxic chemicals on the surface of the pitch.	<p>The concerns raised regarding potential health effects associated with the materials used in artificial sports pitches are noted.</p> <p>However, these matters are not ones that can be determined through the planning process, which is concerned with the land use impacts of development rather than the regulation or certification of products used in its construction.</p> <p>Artificial sports pitches are widely used across schools, sports clubs and public facilities throughout the UK and are designed and installed in accordance with recognised industry standards. This is discussed further in the body of this report.</p>
The production, maintenance, and eventual disposal of plastic sports surfaces contribute to pollution and carbon emissions.	These are not matters that weigh in the assessment of the site-specific planning merits of the application. In this case, the proposal has been assessed in terms of its land use impacts, including ecology and sustainability considerations. The final specification of the pitch surface and associated materials would be secured by condition, to ensure that an appropriate surface is provided. Disposal of any retired pitch surface would need to be carried out in a suitable manner.
Behaviour of the applicant on previous applications.  Masking a more ambitious commercial scheme as per previous applications.	The planning process focuses on the land use implications of a development rather than the identity or background of the applicant. Matters relating to the character or past behaviour of an applicant, including any historic disputes or perceptions of motive, do not constitute material planning considerations and cannot influence the assessment of the current application.
Previous application was refused on this site.  Setting a precedent.	All applications are subject to careful and objective scrutiny, and this case has been assessed on its individual planning merits in accordance with national and local planning policies, as well as all relevant material considerations. The outcome of this application would not establish a precedent requiring the Council to approve future proposals on other sites, which would each be subject to their own separate assessment.
Inadequate noise assessment.  Lack of mitigation proposed.	Mitigation measures are proposed and this is clarified within the Noise Impact section of the report.

49 letters of support where addresses were provided were received and a summary of the comments are set out below:

- Good use of the playing field for the benefit of fitness and teambuilding activities for the students
- There is other available parking in area and large on site carpark
- Best value solution for the development required
- Sensitively designed
- Enable sports teams to provide more outdoor sessions
- Increase the limited sports resources in the area
- Noise or use after dark can be responsibly managed through clear scheduling and school oversight
- Enable year round use of high quality facilities, with lighting allowing benefits for local community beyond school hours
- Ensure that more children and adults have affordable and reliable access to sporting opportunities
- Application results in a better cricket facility
- In Brent alone, child obesity rates have been above the National average since 2008

- Beneficial for the students and wider community, where the existing field is unsuitable
- Future proof hockey in the borough

#### Internal Consultations

Brent's Environmental Health and Noise Officers - No objection raised subject to conditions.

#### External Consultation

Sport England – No objection raised subject to conditions.

Local Lead Flood Authority - No objection raised. The proposed measures are considered to be acceptable.

## **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  
London Plan 2021  
Brent Local Plan 2019-2041

Key policies include:

#### London Plan 2021

GG3: Creating a healthy city  
D4: Delivering good design  
D12b: Fire Safety  
D13: Noise  
G1: Green Infrastructure  
G4: Open Space  
G5: Urban Greening  
G6: Biodiversity and access to nature  
G7: Trees and woodlands  
S1: Developing London's Social Infrastructure  
S3: Education and childcare facilities  
S5: Sports and recreation facilities  
SI1: Improving Air Quality  
SI12: Flood Risk Management  
SI 13: Sustainable Drainage  
T4: Assessing and Mitigating Transport Impacts  
T5: Cycling  
T6: Car Parking

#### Brent Local Plan 2019-2041

DMP1: Development Management General Policy  
BD1: Leading the Way in Good Urban Design  
BSI1: Social Infrastructure and Community Facilities  
BGI1: Green and Blue Infrastructure in Brent  
BG12: Trees and Woodlands  
BHC1: Brent's Heritage Assets  
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

The following are also relevant material considerations:

National Planning Policy Framework  
National Planning Practice Guidance

Supplementary Planning Guidance / Documents:

## **DETAILED CONSIDERATIONS**

### **Principle of Development**

#### Loss of the natural grass playing field

1. The proposal seeks the addition of two artificial sports pitches within the school site, located partially on the site of the existing cricket pitch. The proposal would introduce ancillary fencing around the pitches, acoustic fencing to the eastern and southern sides of the eastern pitch, flood lighting, along with the relocation of the cricket pitch towards the west of the site, and associated ball stop fencing to the western boundary.

2. The development would be located on the school's existing playing field which is designated as protected open space under Brent's Local Plan. Policy G4 of the London Plan sets out that development proposals should not result in the loss of protected open space. Paragraph 104 of the NPPF sets out that existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, should not be built on unless:

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

3. As the proposal results in loss of part of a natural playing field to artificial sport pitches, Sport England have been consulted as a statutory consultee. Sport England have liaised with both the Football Foundation, who advise on behalf of the Football Association, and England Hockey regarding the need for the proposed facilities. The Football Foundation have indicated that whilst they do not consider there to be shortfalls of MUGA provision within the borough, they note there is demand for additional MUGA provision across Brent. The proposed MUGAs would help accommodate some of this demand. In relation to Hockey, England Hockey have advised that there is demand for increased Hockey facility provision in the area, particularly for evening training and weekend matches. As a result, it is considered that the proposed MUGAs would help to accommodate local demand.

4. In addition, the proposal would respond directly to an identified educational need within Kingsbury High School. The existing grass playing field is susceptible to waterlogging during the winter months, limiting its availability for curriculum sport and physical education. The proposed all-weather pitches would provide reliable year-round facilities, enabling the school to deliver a broader and more consistent physical education curriculum, increase opportunities for participation in organised sport, and introduce hockey facilities which are not currently available on the site. The proposal would therefore enhance the quality, resilience and capacity of the school's sporting infrastructure, supporting both educational objectives and pupils' health and wellbeing, whilst also providing facilities capable of serving the wider community outside school hours.

5. As such, while the development would result in the loss of some naturally grassed playing field, the value of the field for sporting use is currently limited as a result of the land becoming waterlogged in the winter months and an overall uneven surface. The proposal would enhance the value of the space for sporting, education and amenity uses which would be enhanced as it would enable year round use of the space for the benefit of the school and wider community through a community access plan. The quality of the space for enabling sports activities would be improved through providing a flat ground surface, with lighting for enhanced winter activity and introduction of provision for hockey which the school currently has no provision for.

6. In respect of cricket provision, the proposal includes the relocation and reprovision of the existing cricket square within another part of the school grounds. Whilst this would result in the existing cricket square being removed, it would not lead to the permanent loss of cricket facilities at the site. Instead, equivalent provision would be re-established elsewhere within the school, ensuring that cricket continues to be available for both educational and community use.

7. Sport England have advised that the replacement cricket square should be fully established and ready for

use before the existing facility is taken out of operation, thereby ensuring continuity of cricket provision throughout the construction process. The applicant has confirmed that this approach has informed the development proposals, and a planning condition is recommended requiring the replacement cricket square to be completed and available for use prior to the removal or decommissioning of the existing facility. Subject to this safeguard, together with details of its construction and ongoing maintenance, the proposed re-provision of the cricket facility is considered acceptable in principle and would ensure there is no interruption or net loss of cricket provision at the site.

8. Subject to the pitch being made available for the benefit of the community through a community use agreement and additional details of the design and layout to be secured through condition in consultation with Sport England, Sport England have advised that they support this proposal as they consider that it would meet Sport England's Exception E5 which states that the provision of the sports facility would outweigh the detriment caused by the loss of the existing playing field, which as highlighted above is not suitable for year round play.

9. It is noted that detailed plans of the pitch layout, fencing and associated infrastructure have been submitted as part of the application. In assessing the proposal, it is recognised that Kingsbury High School occupies a constrained urban site where the extent of available land is finite and must accommodate a range of educational, recreational and operational functions. As such, it is not possible to provide unlimited space for sports facilities or to achieve every aspect of Sport England's preferred design guidance in full.

10. Notwithstanding these constraints, it is considered that the applicant has made best endeavours to design the proposed sports pitches to accord as closely as reasonably practicable with Sport England's specifications, whilst also responding to other important planning considerations. During the assessment of the application, the officers have carefully balanced the requirements of Sport England against the need to protect neighbouring residential amenity, retain important trees and ecological features, safeguard the setting of nearby heritage assets and respond to the physical constraints of the site. The resulting layout is therefore considered to represent an appropriate and proportionate solution that maximises the sporting benefits of the development within the limitations of this constrained urban school site. Any remaining technical details of the pitch specification and operation can be secured through appropriately worded planning conditions, in consultation with Sport England where necessary.

11. The proposal would accord with policy G4 of the London Plan and paragraph 104 of NPPF.

#### Enhanced community facilities

12. Policy BSI1 supports new or enhanced social infrastructure facilities where they are:

- a) Easily accessible by public transport, walking and cycling, preferably in town centres or growth areas
- b) Located within the community they are intended to serve
- c) Provided in flexible and adaptable buildings
- d) Ideally co-located with other social infrastructure uses
- e) Maximising wider community benefits, through if necessary, requiring formal use agreements

13. London Plan Policy S5 relates to Sports and recreation facilities, paragraph B states that development proposals for sports and recreational facilities should:

1. increase or enhance the provision of facilities in accessible locations, well-connected to public transport and link to networks for walking and cycling;
2. maximise the multiple use of facilities, and encourage the co-location of services between sports providers, schools, colleges, universities and other community facilities;
3. 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.

14. It is considered that the proposal will meet the requirements of the policy as it would see the continued use of the space for sporting/recreational use in an open environment and would maximise both on site sporting provision for the educational use, along with wider community benefits in the form of public access (secured by condition). The natural grass of part of the school playing field would be lost, however the value of the space for recreational sporting and amenity uses would be significantly enhanced as it would enable year round use of the space for the benefit of the school and wider community through a community access provision. The quality of the space for enabling sports activities would be improved through providing a flat

ground surface, with lighting for enhanced winter activity and introduction of provision for hockey which the school currently lacks. It is noted that the site at present can only be used for parts of the year due to the existing surface becoming waterlogged and damaged predominantly through the winter months.

15. The site is an a PTAL 1b/2 area and is approximately 900m walking distance to the closest underground station, Kingsbury. However, this is an existing and established school and although located in a lower PTAL area this does not diminish the school's ongoing requirement or need to provide good quality and adequate facilities to support year-round sports provision and participation to support the school curriculum and to encourage activity and exercise to its pupils. It is noted that there is already an element of community access to the school and its grounds, and this would continue albeit through a controlled Community Access Plan.

#### Community Access / Management Considerations

16. The existing community access arrangements are that the existing sports pitches, courts and sports hall are used by the school until 6pm on weekdays. The pitches can be hired by the local community until 9:30pm on weekdays during term time and on weekends the facilities are offered to rent from 8am to 11pm. At the moment the outside facilities can only be hired during daylight hours as there are no lighting facilities.

17. The proposed MUGA pitches would be available for use through all-seasons and will provide a new hockey pitch which is not currently available at Kingsbury High School. The cricket pitch would also be available for hire during the cricket season, outside of school hours.

18. Access to the new pitches would be via Kingsbury High School using the existing access points from Princes Avenue. Pedestrian access to the MUGA pitches from the site frontage will be signed with pedestrians entering the site through the main entrance and heading south towards the sports hall along the eastern elevation of the classroom block (Block B). Access to the MUGA pitches would be across the sports pitches or following the walkway around the northern perimeter of the fields.

19. Community bookings would be permitted to use the existing school car park accessed from Princes Avenue. The proposals do not result in any changes to the existing access or parking arrangements. The school have provided additional information on their booking summary and predicted weekday evening use. The realistic worst-case scenario provided would be based on a single booking per pitch, with a total of 80 people using the pitches if matches were held on two of the pitches simultaneously. It is considered to be unlikely that all three pitches would be in use outside of school hours simultaneously. It is noted that cricket is only generally played within the summer months. A more realistic scenario for general training would have a more likely maximum of 70 people. Weekend use is predicted to have two bookings per day, with similar maximum numbers as weekdays at any one time.

20. Overall, the proposed arrangements for community access to the new sports facilities are considered to represent a positive and proportionate enhancement to the existing pattern of community use at the school. The new all-weather MUGA and hockey pitch would increase year round availability of high quality sports provision for local groups, while continuing to operate within the established access routes, parking areas and management structures already in place at Kingsbury High School.

21. Furthermore, in order to ensure that the extended opportunities for community use are managed in a way that protects the amenities of nearby residential properties, a condition would require the submission of a detailed Community Use Agreement and associated management plan. This would secure clear arrangements for booking, supervision, site security, hours of use and noise management, transport/travel and parking arrangements, and would be reviewed by the Council in consultation with Sport England. When considered in combination with these safeguards, the expanded community access is regarded as acceptable on balance and consistent with the objectives of Policy BSI1 of the Brent Local Plan, which encourages enhanced social and community infrastructure that is well managed and accessible to the wider community.

#### **Design, siting and appearance**

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

(a) of 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

#### Artificial sport pitches (MUGAs)

23. The artificial sports pitches would occupy a section of the school's playing fields towards the eastern boundary with Bacon Lane. Comprising a 126m x 102.5m fenced area with 4m high mesh fencing and artificial grass onto a porous base. The pitch located on the eastern end of the site, marked as "hockey pitch" on the plans would also contain an acoustic fence at 2m high along its northern, eastern and southern boundaries.

24. The pitches would be lined by a green weldmesh fence which is broadly consistent with the design of other enclosed sports pitches, common with other similar school sites. The enclosure has a maximum height of 4m on all boundaries of the pitches. An acoustic barrier fence is also proposed at 2m high along the northern, eastern and southern elevations of the eastern pitch. The green weldmesh fences will allow for substantial flow of light and visibility from and to the inside of the pitch, retaining a suitably open character within and around the pitch. The acoustic fencing at 2m high would be more solid in appearance but at a height that is typical for standard boundary treatments that would usually be Permitted Development.

25. The fences are proposed to be powder coated green which would be of a suitable appearance to blend into the surrounding school environment and green landscaped area, when considering the trees and shrubs situated on the Roe Green Park and residential boundaries.

26. The artificial pitches are proposed to be accessed by the existing access gate from the front parking area of the site from Princes Avenue, allowing for maintenance vehicles. No new access is proposed to be provided, with no associated additional perimeter boundary fencing.

27. During the course of the application, the football pitch was relocated further northwest than the original submission, closer to the main school buildings. The size of the hockey pitch was slightly reduced and moved further to the northwest, away from the site boundary and nearby residential properties. It is now located away from the existing hedge and tree canopy by approximately 1.5m at the closest point, as well as neighbouring properties to the east.

28. Overall, the fencing proposed in connection with the artificial pitches is considered to be appropriate in its form, height, design and visual appearance. The materials proposed would preserve the site's visual openness, while the green powder coated finish ensures the structures would sit comfortably within the established school landscape and the surrounding green context. Taking these factors into account, it is considered that the proposed fencing would not unduly harm the open character of the school grounds, nor would it adversely affect the open character of the wider area or protected open space. The development is therefore acceptable in this regard.

#### Floodlights to the artificial sport pitches

29. For the football and hockey (MUGA) pitches, the proposal seeks permission for 8 floodlight masts per pitch with a maximum height of 15m per pole. The proposed lighting from the 15m masts is designed to meet the requirements for mid-level competition, training, and local club matches.

30. The proposed floodlights have been located around the two proposed artificial sports pitches to minimize the potential for light spill to neighbouring sites and would be mounted in concrete foundations. The finishing of the columns would be conditioned to ensure they reflect the surrounding area and blend in with the existing and proposed perimeter fencing. Whilst it is noted that these will be visible from the surrounding area, it is considered that these would not be uncharacteristic of a modern operating school. The pitches have been located as central within the site as possible, allowing for the dimensions of the required cricket facilities to the west to be maximised. The pitches and associated lighting have been kept away from the neighbouring boundaries as far as possible in order to reduce any potential impact on neighbouring residential properties.

31. In addition, the design and technical specification of the floodlighting has been developed to ensure that light spill is tightly directed onto the playing surfaces themselves, with illumination levels falling away rapidly beyond the pitch boundaries. As shown in the submitted lighting assessment, the distribution of light would avoid harmful spill to the wider school grounds or the surrounding residential properties, ensuring that the amenities of nearby occupiers are not unduly affected. Furthermore, conditions would be imposed on any consent to strictly limit the hours during which the floodlights may operate, ensuring that they are switched off no later than 9:15pm. These safeguards provide robust control over lighting impacts and ensure that the proposal accords with Local Plan Policy DMP1 and relevant guidance on protecting residential amenity.

#### Ball stop fencing to the cricket practice facility

32. Ball stop fencing to a height of 6m is proposed to just the western boundary of the relocated cricket practice facility to reduce the likelihood of balls breaching the gardens of the properties on Grosvenor Crescent and Manor Close. The fence would comprise a mesh metal section to a height of 2.4m and above this, a top netting enclosure. This would be placed inside of the existing boundary fencing, set back from the boundary with neighbouring properties. The ball stop fencing was, during the course of the application, moved further east, away from the neighbouring boundary in order to address Sports England comments and also reduce the impact on neighbouring amenity.

## Heritage Considerations

### Policy background

33. 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.

34. 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 [...]"

35. 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."

36. 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.

37. 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.

38. 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.

39. 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.

40. 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".

### Assessment

41. As discussed above, the application site includes the main school building of Kingsbury High School. This has been considered by Brent's Heritage Officer to be a non-designated heritage asset. It should be noted that no works are proposed to the building itself, so in relation to the non-designated heritage asset, the potential impacts relate to only its setting in isolation. In addition, the application site adjoins Roe Green Park to the south which is locally listed (and also defined as a non-designated heritage asset). Within Roe Green Park is Kingsbury Manor House and the walled garden, which are Grade II listed buildings, and Roe Green Village Conservation Area is located to the east of the application site. It is noted that the school does not fall within the Conservation Area itself.

42. The application has been accompanied by a Heritage Statement and indicative views from locations surrounding the site. These views provide an assessment of where the floodlights are likely to be most visible as they constitute the tallest elements of the proposed scheme which would be most visible from surrounding viewpoints.

43. There is some potential for the proposed MUGAs to have a limited visual impact on the setting of several designated and non-designated heritage assets, namely the Grade II listed buildings forming Kingsbury Manor and its associated summerhouse, as well as the locally listed Roe Green Park, and views from within Roe Green Village Conservation Area. Concerns were raised in comments and objections from nearby residents that the floodlights would exceed surrounding residential rooflines, interrupt skyline views from Roe Green Park and introduce engineered sports infrastructure into a sensitive green edge. It is acknowledged that there would be some limited visual impact from the floodlighting from within the Roe Green Conservation Area; however, given that there is mature and extensive tree canopy around the site and as the urban grain of the Conservation Area is constrained, these impacts would be limited and only visible from certain vantagepoints through glimpsed views.

44. Whilst the floodlighting columns would be visible from within parts of the Conservation Area and Roe Green Park, such facilities are commonly associated with schools and their sports grounds. As a result, the engineered character of the sports fields would not appear incongruous and out of character within the context of an established school. Furthermore, due to the mature and extensive tree canopy and boundary hedging, and the generally enclosed pattern of development within the Conservation Area, visual impacts would be limited as highlighted above.

45. To expand further on the character of the proposed development when considered against its context, it is also relevant that the proposed floodlighting columns would be located within the grounds of an established secondary school and in close proximity to existing school buildings, which already create a somewhat institutional character. When considered against this backdrop, the introduction of slimline lighting columns associated with outdoor sports provision would not appear out of keeping with the established pattern of development of the school, nor the functional nature of the school estate. As a result, any visual impact on the setting of nearby heritage assets is considered to be limited and isolated, with the existing school context providing an appropriate and robust visual framework in which the structures would read as not being incongruous. This reinforces the conclusion that the level of harm identified would be less than substantial, and limited, and on balance acceptable when weighed against the wider character of the site and its setting and the benefits of the proposed development.

46. It is acknowledged that parkland vistas experienced by visitors to Roe Green Park would be affected to some degree. These views would include tall but slender floodlighting columns and associated lighting that would obscure small areas of open sky. If users of the park were to experience harm to the local heritage assets via setting effects, this could be no more than a limited level of less than substantial harm. Overall, it is considered that any harm to the setting of the nearby designated and non-designated heritage assets would amount to no more than a limited level of less than substantial harm. The specific details of the lighting columns including the finish would be conditioned to ensure that they blend into the landscape as far as is reasonably practicable.

47. For harm to be considered substantial, the adverse impact must seriously affect a key element of a heritage asset's special architectural or historic interest. This is not considered to be the case in this instance. The degree of harm is therefore judged to be limited and is outweighed by the clear benefits of the proposal for the school and the wider local community.

48. This site is not within an Archaeological Priority Area. The Greater London Archaeological Advisory Service (GLASS) were consulted on this application and confirmed that the proposal is unlikely to have an impact on heritage assets of archaeological interest.

### **Impact to Neighbouring Amenities**

49. Local Plan Policy DMP1 seeks to ensure new development, amongst other things, does not unacceptably increase exposure to noise, light and general disturbance. This is supported by Brent's Supplementary Planning Document 1 which contains guidance that seeks to protect neighbour amenity.

50. SPD1 guidance sets out the parameters for acceptable amenity impact in respect to the height of the development and ensuring that the proposal does not appear overbearing. As a guide, the fencing should sit within a line drawn at 45 degrees from the edge of the rear garden measured at 2m high above garden level.

#### MUGA facility and flood lighting

51. The nearest residential properties are located to the west of Bacon Lane, approximately Nos 1A to 11 which are located closest to the hockey pitch, with a separation distance at the closest point of 45.45m from the eastern side of the fencing to the rear garden boundary line of No 1A Bacon Lane. To the west, the closest properties to the football pitch would be 38-48 Grosvenor Crescent, which are approximately 116m from the western side of the MUGA, at the boundary with No 38 which is the closest. It is noted that there is a rear alleyway / service road which separates the majority of the rear gardens for the properties on Grosvenor Crescent from the boundary with the site.

52. Taking these separation distances, boundary conditions and the guidance within SPD1 into account, it is considered that the proposed fencing and associated structures would not result in an overbearing or unduly intrusive form of development when experienced from nearby residential properties. The permeable nature of much of the fencing, the substantial separation to the majority of dwellings and the presence of existing boundary treatments and vegetation all help to limit visual impact and preserve an acceptable level of outlook and sense of enclosure. As such, the proposal would not give rise to an unacceptable level of harm to any neighbouring amenity and is considered to comply with the requirements of Local Plan Policy DMP1 and the principles set out within Brent's Design Guide SPD1.

#### Ball stop fencing and netting

53. The distance between the ball stop fencing and netting and the properties on Grosvenor Crescent is approximately 20m where the service road separates them and 12m between the rear boundaries of Nos 38 and 40 and the fencing. Nos 29 and 30 Manor Close, to the southwest of the site also have a similar distance of around 11m from their rear gardens to the fencing.

54. The fencing closest to Grosvenor Crescent and Manor Close would be 6m high. The fencing would be generally semi-transparent in nature (considering the proposed fence posts, etc) to ensure that an open appearance is maintained, and that it would not appear to be unduly overbearing from neighbouring properties. It is also noted that due to the permeable nature of the fencing, it is considered to have only a limited impact on overshadowing or loss of daylight or sunlight. To a height of 2.4m, the fencing would be metal mesh but above this it would be a more lightweight netting. It should also be noted that there is existing boundary fencing of approximately 2.4m high.

55. The nearest residential properties are located to the west on Grosvenor Crescent, from No 38 to 52, where the fence then angles away from the boundary. Nos. 38 and 40 Chapman Crescent are located closest due to the lack of a service road, with a separation distance at its closest point of 12m. Nos 29 and 30 Manor Close have a separation of approximately 11m from the southwest corner of the fencing. Therefore, at its closest position with these properties, the ball stop netting would not breach the 45-degree line as set out within the guidance contained within SPD1. Additionally, during the course of this application the ball stop fencing and associated netting were moved further away from the site boundary, further reducing any potential impact on neighbouring properties.

56. Overall, whilst the fencing would be visible from some neighbouring garden boundaries, its overall permeable design, the presence of existing boundary treatments, garden depths to the affected properties, and the fact that the 45-degree line is not breached meaning that the structure would not result in an unduly dominant or oppressive form of enclosure. When considered within the context of SPD1's guidance on overbearing impact and the requirement under Local Plan Policy DMP1 to protect neighbouring outlook and amenity, the proposal would avoid significant harm to the living conditions of nearby occupiers and is therefore considered to be acceptable in this regard.

Noise impact and operational hours

57. 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.

58. There is the potential for noise associated with play to disturb residents; however this land has functioned as a playing field for some time prior to this application being submitted, in relation to the existing school, so it is considered unlikely that noise would be significantly greater than when the pitch was used for play purposes during the school day. It is acknowledged that there would be some additional noise impact during out-of-school hours, however this would be controlled by condition.

59. 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 these would be generally sporadic. As outlined the overall operational hours of the pitches are as follows:

October to March	08:00 to 21:00
April	08:00 to 19.30
May to August	08:00 to 20:00
September	08:00 to 19:00

60. During term time the school will use the facilities as required between 08:00-18:00 hours.

61. Nevertheless, any proposals for new development, including previously approved uses, would be assessed against the relevant planning policies documents and guidelines.

62. The application was submitted with a Noise Assessment [HA/AH40/V2], prepared by Healthy Abode Acoustics, dated 15 October 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)', which is deemed to be appropriate and specifically relevant to this application. The assessment advises that the Sport England guidance for noise levels from sports pitches should be no more than 50dB LAeq, 1m from the nearest residential façade.

63. Sport England AGP guidance states that "the most significant noise levels were found to be generally derived from the voices of players" (with the exception of Hockey) and provides the following levels for a typical match on AGP:

"From the measurement data, a typical field free noise level of 58dB LAeq, 1 hour at a distance of 10 metres from the sideline halfway marking has been determined as representative of noise from an APG."

64. The Sports England emission source of 58 d LAeq,T from the perimeter at the halfway line has been applied to the noise model.

65. It should be noted that the noise assessment daytime period is 0700-2300 hours and nighttime 2300-0700 hours therefore the assessment considers daytime average levels over the full daytime period,

including evening. The calculations are also based on the worst case of the sports pitches being in operation constantly throughout the whole period.

66. The unattended survey was conducted between Wednesday 26th February 2025 – Monday 3rd March 2025 at two fixed monitoring points, located to the east and west of the site.

67. The noise levels from the proposed AGPs are predicted to exceed the typical operational background level of 41-44dB(A), dependent on noise monitoring position.

68. However, the proposed AGPs achieve the Sport England AGP Guidance criteria which utilises and compares against ambient (L Aeq ) levels. The AGP Guidance and WHO external guidance gives the criteria of 50dB L Aeq,T at 1m from the Noise Sensitive Receptors, and the predictions of the proposed AGPs show that this is met.

69. Due to the background noise level being exceeded, mitigation measures have been recommended.

70. It is acknowledged that the proposed development would result in some noticeable sporadic noise events over the daytime period such as voices, impact noises, whistles etc. Due to these higher noise level events, agreement was made with the applicant to install an acoustic barrier around the hockey pitch as this is the closest to residential properties. The distance to nearby receptors would reduce the noise levels from the football pitch and the noise associated with hockey would be the balls hitting the hockey sticks at lower levels therefore the acoustic barrier at a height of 2 metres is considered to be sufficient in order to mitigate this harm.

71. A condition would be attached to any approval requiring a noise management plan, as part of the community access agreement, to cover use of all hours, with differing groups using the facility; school and community groups. The specification required for the barrier would also be conditioned.

72. It is noted that the noise assessment focuses on the noise from the MUGAs, however as there is no increase in hours above that of the existing cricket pitch use, the Council's Environmental Health officers do not consider that cricket activities would make a noticeable change to the noise levels within the noise assessment.

73. The wider social and community benefits associated with the proposed development in terms of sporting facilities, education provision, health and wellbeing are considered to outweigh the level of additional noise impact. Provided the noise mitigation measures are implemented, Environmental Health Officers have no objections in terms of noise. The application is therefore on balance considered to be acceptable in this regard.

74. Overall, it is considered that in this instance the proposal would not cause any undue or substantial harm on the amenity of the neighbouring residential properties, subject to the mitigation proposed and therefore the proposal is considered to be acceptable on amenity grounds in relation to noise in isolation.

#### Flood lighting

75. A Sports Lighting Design Strategy and Outdoor Lighting Report have been submitted to support the application. The height of the columns for the artificial sport pitches would be 15m high to meet the requirements for ongoing school sporting use, along with mid-level competition, training, and local club matches.

76. The sport pitch lighting levels were based on the Chartered Institution of Building Services Engineers (CIBSE) Society of Light and Lighting (SLL), 'Lighting Guide 4' which relates to sports lighting. Table 3.21 in this document suggests that class II lighting for outdoor football requires an average horizontal illuminance of 200 Lux and 0.6 uniformity. Section 3.29 suggests that outdoor hockey requires an average horizontal illuminance of 300 Lux and 0.7 uniformity. The ILP GN01/21 'The Reduction of Obtrusive Light' recommends maximum Lux levels in different environmental zones and for post and pre-curfew times. The flood lighting would be turned off no later than 9.15pm, and therefore, maximum allowable lighting levels will be based on pre-curfew levels as described in GN01/21. Maximum pre-curfew, Environmental Zone 3, vertical illuminance is 10Lux.

77. The lighting spill to the north and west would fall within the school grounds due to the distance to the boundaries. The lux levels would fall to 0 within 40m on the western side of the football pitch so would not reach the neighbouring properties. There is shown to be some minimal spill towards the rear of the properties

on Bacon Lane. However, the contours show that the 1Lux contour does not encroach into any of the gardens and therefore would not impact on the vertical surfaces of the rear of these properties.

78. To the south there is minimal spill to the scrap yard area where a 1Lux contour encroaches onto the yard by approximately 11m. It should be noted that the lighting contours do not take account of the screening effects of a number of intermittent trees, some low hedge growth and fencing to the scrap yard area, or the proposed planting features to be introduced. It would not impact on the nearest southern property, Southover Partnership Special Needs School which is approximately 130m away.

79. The proposed light spill would have an overall negligible effect on the amenities of residential properties in the surrounding area. Calculations show that lux values would fall to zero before any vertical plane of a property is reached. Therefore, as the standards allow 10Lux on a vertical plane up to a pre-curfew time of 9:15pm and the results show 0Lux before the property vertical planes then it can be concluded there would be no unduly detrimental impact on neighbouring properties in relation to light spill.

80. The lighting design has shown that both football and hockey pitches can be illuminated to a recognised sports lighting standard without an unduly adverse impact upon the amenities of the properties in Bacon Lane, Grosvenor Crescent or Manor Close.

81. Overall, the submitted lighting strategy demonstrates that the proposed floodlighting can achieve the illumination levels required for safe and effective sports use while maintaining very low levels of light spill beyond the immediate playing area. The modelling shows that lux levels would fall to zero before reaching any sensitive residential façades, ensuring that the lighting would not give rise to unacceptable glare or disturbance to neighbouring occupiers.

82. As such, the floodlighting would not result in undue harm to the amenities of nearby residential properties and is considered acceptable in accordance with Policy DMP1 of the Brent Local Plan and the guidance on light pollution set out within the Sustainable Environment and Development SPD.

## **Transport and Highways Considerations**

### Car parking

83. Parking allowances for schools are stipulated in Appendix 4 of the adopted Local Plan. As the site has low access to public transport, up to one parking space per 5 staff is permitted. Staff numbers have not been specified, but from previous applications, it is assumed that there are approx. 239 staff members at the school, so the existing provision of 83 car parking spaces is currently in excess of standards, though this is an established baseline, and is therefore acceptable.

84. The two proposed MUGA pitches and cricket pitch would be used by the school during the weekday and could be made available to hire for the local community during weekday evenings and at weekends. Parking standards for leisure facilities are stipulated in Appendix 4 of the Local Plan and allow 1 car parking space per 10 users/visitors, with an active commitment to reduce congestion and traffic levels. The existing car park for the school has 83 spaces (including 2 disabled spaces), which would be available to the local community when hiring the pitches outside of school hours. This is considered to be sufficient to accommodate for parking requirements outside of school hours.

85. The Transport Statement notes that the pitches would not be used by the public during the school hours or before 6pm, so the existing car park can be shared between the school during school hours and by the local community outside of school hours.

### Trip generation

86. The existing sports pitches are already hired out on weekdays during term time between 6pm – 9.30pm, on weekdays outside of term time between 8am – 9.30pm and on weekends between 8am – 11pm. The school have confirmed that this includes the existing cricket pitch. Other facilities which can also be hired between these times include classrooms, the main hall, pavilion dining hall and sports hall. Other school lettings are expected to be one-off or ad-hoc events, which would be appropriately managed by the school's lettings team. Several of the rooms mentioned above are expected to attract significantly smaller visitor numbers as and when they are used.

87. The pitches would have a combined expected reasonable worst case playing capacity of approximately 80 users at any one time. Whilst this figure does not include any incidental spectators, it is not anticipated

that community use of the facilities would generate significant spectator attendance, with the pitches primarily intended for training sessions, school use and local recreational matches.

88. Predicted vehicular trip generation for the sports facilities has been based on Census modal share data (method of travel to work) for output areas within the local Kingsbury/Queensbury district. The results show that 41% of respondents travel to work by car, 43% use public transport, 1% cycle and 8% walk. This modal split has been used to predict the likely person and vehicular movement for the suggested 80 attendees.

89. As such, Table 3 within the submitted Travel Statement predicts a weekday evening vehicular trip generation of 36 cars and a weekend vehicular trip generation of 72 cars across the course of the day. This assumes that one booking would be made for each pitch on weekdays and two bookings for each pitch on weekends. The estimated maximum parking demand at any time is therefore for 36 cars, although the nature of the use means that there is scope for car sharing. This level of demand would leave approximately 44 parking spaces available for other lettings at the upper school, which is considered to be adequate.

90. The community use at evenings and weekends would also be outside of peak traffic hours on the local highway network, so any traffic generated would be at times when the roads are less busy, meaning the proposal would have little adverse impact on highway capacity in the area.

91. The existing provision of 83 parking spaces can therefore accommodate the expected demand for parking from the local community. Although this parking level exceeds parking standards as set out in Appendix 4 of the adopted Local Plan, they are existing spaces that are being made use of, not new spaces, so this is considered to be acceptable on balance.

92. The site has two vehicular access points from Princess Avenue, which form a one-way system. No alterations to the access arrangements are proposed as part of this application. All delivery and servicing will be carried out within the site. This removes any concerns regarding traffic safely driving into and out of Princess Avenue.

#### Travel Plan Statement

93. A Travel Plan Statement for the sports facilities has been provided to help mitigate any impact that may arise from the proposal. This proposes to include sustainable travel information upon booking the pitches, with the aim of reducing car use over a five-year period. The Travel Plan Statement is welcomed, and its implementation would be required to be secured by condition to aid a reduction in traffic congestion and encourage sustainable transport.

#### *Cycle parking*

94. To help to support the Travel Plan, 20 new cycle parking spaces would be provided for the sports facilities, which can be shared by the school during the day and the wider community after 6pm.

95. The cycle store would replace an existing store located in the north-western corner of the site. It would be larger in size to accommodate more bicycles but would result in the loss of only a small amount of existing soft landscaping.

96. The loss would be less than 25sqm and would be a grassed area which already houses cycles. The cycle store would appear to be an improvement as it would be secure and increase the stores capacity, justifying the small loss of landscaping. The proposed cycle store would be located a sufficient distance away from any neighbouring residential properties as not to impact on their amenity in terms of daylight, sunlight, outlook, loss of privacy or an increased sense of enclosure.

#### Lighting (Transport Impacts)

97. The lighting levels have been provided and need to illuminate the pitches to 200-300 lux. However, the lighting will be directed to the pitches, with lighting spill well below 10 lux. This is compliant with Institution of Lighting Engineers guidance for an E3 (suburban) environmental zone. The pitches are over 50m from any Public Highway, so lighting levels will not cause any glare to highway users.

#### Transport Summary

98. In summary, the sports pitch would be likely to increase the number of after school events which may

lead to an increase in trips to the site, however, the school has a car park with an 83 space capacity and it is considered that any demand for parking during out of school hours is unlikely to be greater than this and so could be accommodated on site. The use of the pitches during school hours is not considered likely to result in significant highways / transportation impacts as the trips associated would be those taken as part of travel to the school from normal operation. The site is not expected to result in overspill parking from the use of the sports facilities outside of school hours.

## **Green Infrastructure**

### Trees

99. London Plan Policy G7 requires development proposals to retain existing trees of value wherever possible. Where the loss of a tree is unavoidable, appropriate replacement planting should be secured using a recognised valuation method such as CAVAT or i Tree, with an emphasis on large canopy species that offer the greatest long-term benefits. Similarly, Brent Local Plan Policy BGI2 requires major developments to retain trees on site wherever feasible and, where retention cannot be achieved, to provide new trees that deliver an equivalent canopy cover either on site or through an offsite financial contribution.

100. A detailed tree survey submitted with the application identifies twenty-four individual trees, three tree groups and two hedges within and adjacent to the site. The proposed MUGA works involve excavation for a new subbase, installation of drainage and the relocation of the cricket wicket and outfield to the west. During the assessment process, the position of the pitches was amended to move them further away from the southern boundary with Roe Green Park, and the ball stop fencing was also adjusted to reduce potential impacts on established trees and on the gas pipeline.

101. The majority of trees surrounding the development area lie outside the site, including those within Roe Green Park, the grounds of Kingsbury House, the rear gardens of properties on Manor Close and land behind Grosvenor Crescent. On site vegetation is limited to a mixed species hedge (H11), a young Common Oak (T14), a Common Hornbeam (T22), a Small leaved Lime (T23) and a further predominantly Hawthorn hedge (H29).

102. Along the southern boundary, several veteran oak trees within Roe Green Park are of high ecological and heritage value and constitute irreplaceable habitat. Of note is T07, a mature Category A oak with a trunk diameter of 1,100mm located just outside the red line boundary. This tree, along with the other significant trees in the park, was a key constraint in the site layout. As a result of amendments made during the application, the Root Protection Areas of these trees would not be affected by the development, and all works are now located at a suitable distance to avoid encroachment. Similarly, hedge H11 can be protected in situ through the retained protective fencing shown on the submitted Tree Protection Plan.

103. None of the offsite trees would require removal to accommodate the development. While the proposed ball catch netting passes close to the crown of T19 (Horse Chestnut), the final installation would be positioned to avoid direct conflict with tree canopies and would meet the boundary between T19 and T18 (Pine). Fence posts, once their positions are finalised, must be located to avoid significant roots measuring 25mm or greater in diameter, and the Tree Protection Plan has been prepared on the basis that retained tree crowns will contribute to ball strike mitigation, particularly where the crown of T18 extends above the height of the netting.

104. To compensate for the limited impact on the existing tree stock and to enhance the southern boundary, the proposal includes the planting of 18 new trees, with species and locations selected so that they do not encroach onto the MUGA in the future. Full details of these trees, along with any associated soft landscaping, will be secured through the recommended landscaping condition. A compliance condition is also proposed requiring all works near retained trees to be carried out in accordance with BS 5837:2012 and the approved arboricultural method statement including tree protection plan, ensuring that tree health is safeguarded throughout construction.

### Ecology and Protected Species

105. An Ecological Impact Assessment including a UKHab survey of possible ecological affects has been undertaken for the proposed development.

106. The proposed development area comprises modified grassland and is currently in use as a playing field on school grounds. Overall, this area is of poor quality and low in ecological value.

107. Whilst there are no potential roosting features within the red-line boundary, proposed floodlights mean that the potential impact of artificial lighting on bats requires further consideration, as high levels of artificial lighting may reduce overall commuting/foraging habitats. Priority habitat, a hedgerow with veteran trees, also exists along the southern boundary of the site.

108. Due to the presence of this irreplaceable priority habitat in close proximity to the proposed floodlights, which may provide habitat for nesting birds, as well as the close proximity of Roe Green Community Garden and Fryent Country Park site of Metropolitan Importance for Nature Conservation (which provides further habitat for bat roosts in the area), lighting proposals were adjusted during the course of the application to avoid as far as is practicable risks associated with loss of ecological function. It was recommended that the southern boundary hedgerow is kept as a dark corridor, with light contours allowing a 10-metre distance either side with no additional light pollution. As such, lighting restrictions were recommended.

109. The following lighting restrictions are to be implemented:

- October to March (bat hibernation) – Flood light use only between 8am to 9:15pm
- April (bat hibernation) – Flood light use only between 8am to 7.30pm.
- May to August - Allow use of the pitches between 8am to 8pm. Keep flood lights off
- September - Allow use of the pitches between 8am to 7pm. Keep flood lights off

110. These measures go as far as possible to limit impact on bat hibernation periods and limit the use of the flood lights where not required, for example in the summer months.

111. A Non licenced Mitigation Plan: Great Crested Newts document was submitted with the application. Habitats recorded on site were assessed to be sub-optimal for great crested newts, given their frequent management and usage as playing fields. Due to the lack of suitable terrestrial and aquatic habitat within the site, the anticipated risk to Great Crested Newts (GCN) and common amphibians resulting from the development is considered low.

112. However, given the presence of a great crested newt class survey licence return approximately 130m south of the site and the pond approximately 70m south, their presence cannot be discounted, and mitigation is considered necessary for implementation during the construction phase to reduce the potential for impacts to an acceptable level. Furthermore, there is scope to provide habitat enhancements on site to ensure opportunities for GCN and common amphibians and remain post-development.

113. Given that the terrestrial habitat (modified grassland) due to be impacted does not offer suitable foraging, sheltering or commuting habitat for great crested newts, it is deemed that eDNA or population surveys of the pond are disproportionate to the risks. Therefore, strict precautionary working methods must be followed to ensure no offence is committed and to reduce the risk to amphibians.

114. The GCN report proposes a construction environment management plan and hibernation habitat for amphibians created as part of the site biodiversity enhancements. This approach is suitable given the limited impact the development would have on great crested newts and compliance with this document would be conditioned.

115. Overall, the impact on protected species is considered to be limited, with suitable measures put in place to control lighting and amendments made during the course of the application to move the development away from sensitive features.

#### Biodiversity Net Gain (BNG)

116. Biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act (TCPA) 1990.

117. 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.

118. 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 geodiversity of an area.

119. The proposals show that 12,900 square metres of Modified Grassland habitat is to be replaced with developed land (a football pitch and hockey pitch). Netting is also to be installed in the wider site, although this is expected to impact less than 25 square metres of habitat.

120. The Biodiversity Matrix submitted with the application sets out that the proposal would result in the loss of 2.58 on site habitat units. There are no hedgerow units or watercourse units on site. The Biodiversity Matrix also sets out details on the baseline assessment within the wider school site, and the intervention works and the resulting net gain. This includes the additional planting of small native trees and the creation of moderate condition Other Neutral Grassland habitat. Hedging is also proposed.

121. Including habitat retention, creation and enhancement there is an overall net gain of 1.02 habitat units within the wider site resulting in 39.66% net gain in biodiversity. In addition, there is an increase of 0.18 hedgerow units within the wider site, but these have not been included within the % gain set out above.

122. In summary the proposal would achieve a net gain in biodiversity that meets the minimum 10% statutory requirement and the requirements of policy BGI1 of the Local Plan. The statutory biodiversity gain condition, which applies automatically to this application under Schedule 7A of the Town and Country Planning Act 1990, will require the applicant to submit a Biodiversity Gain Plan for approval prior to commencement. In addition ecological enhancement measures would be secured within the landscape planning condition.

### **Safety and Specification of Artificial Pitch Materials**

123. A number of representations raise concerns regarding the materials used in artificial sports pitches, including potential impacts on human health and the environment.

124. These concerns are acknowledged. However, the planning system is concerned with the land use impacts of development rather than the regulation of construction products or the assessment of chemical safety. The manufacture, composition and placing on the market of materials used within artificial sports pitches are subject to separate statutory controls, including the UK chemicals regulatory framework (UK REACH) and wider product safety legislation.

125. Sport England recognises that concerns have been raised regarding the environmental impacts of some artificial pitch systems, particularly in relation to the release of microplastics. Its current position is that these concerns should be addressed through improved pitch design, containment measures and the continued development of more sustainable alternative materials. Sport England also notes that a range of alternative infill materials are currently being evaluated and that further evidence is being gathered to inform future industry practice.

126. There is no evidence before the Local Planning Authority to indicate that the proposed development would utilise materials that do not comply with the relevant statutory requirements applicable at the time of installation. The detailed specification of the proposed playing surface has not yet been finalised and a planning condition is therefore recommended requiring the submission and approval of the final surface specification prior to installation. This will ensure that an appropriate surface, incorporating suitable materials and any necessary containment measures where applicable, is provided in accordance with current regulatory requirements and recognised industry best practice.

### **Air Quality**

127. 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. Kingsbury High School is located outside of both a Growth Area, and an Air Quality Focus Area and as such should be Air Quality Neutral.

128. No new energy plant is proposed as part of the development and therefore an assessment against the Building Emissions Benchmark was not considered necessary. No new parking spaces are proposed, as the proposal will not increase parking demand. The existing 82 spaces would be used during community bookings. However, based on the nature of the proposal, the pitches would potentially increase vehicle movements when in use outside of school hours. In order to assess a worst-case scenario, the higher trip generation identified at the weekend was used. Based on 72 vehicle movements, the proposal is expected to generate up to 26,280 car trips per year. For the purpose of calculating the Transport Emission Benchmark (TEB), a trip rate of 47.2 for developments associated with 'Assembly and leisure' for sites located in Outer-London was used. This was multiplied by the site area of 12,900m<sup>2</sup>. Hence, the TEB was calculated as 608,880 car trips per year.

129. Overall, whilst the proposal would generate some additional vehicle movements associated with community use outside school hours, these are predicted to be relatively modest, amounting to approximately 26,280 vehicle trips per annum under a worst-case assessment. This is substantially below the Transport Emissions Benchmark of 608,880 trips per annum that is applied to developments of this scale and land use when assessing compliance with the London Plan's Air Quality Neutral requirements. Environmental Health have therefore confirmed that the proposal is air quality neutral in respect of transport emissions. Taking this into account, together with the proposed Travel Plan measures to encourage sustainable travel, the proposal is not considered to give rise to unacceptable air quality impacts and is therefore acceptable in this regard.

### **Flooding and Drainage Considerations**

130. 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:

- a) minimise the risk of flooding on site and not increase the risk of flooding elsewhere;
- b) wherever possible, reduce flood risk overall;
- c) ensure a dry means of escape;
- d) achieve appropriate finished floor levels which should be at least 300mm above the modelled 1 in 100 year plus climate change flood level; and
- e) not create new basement dwellings in areas of high flood risk.

131. 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.

132. 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.

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

134. The area of land to be developed consists of a natural grass area, primarily used as playing fields and for sports. Whilst the site currently comprises a naturally draining grass sports field. The natural drainage characteristics of the site in its undeveloped state results in all rainfall events generating immediate runoff and overland flows due to the lack of soil infiltration or other drainage features. A drainage assessment for the existing playing field was submitted, which observed that the permeable backfill over the pipes was heavily contaminated with soil, making it very inefficient in removing water from the soil profile. In addition to the compromised drainage system, the surface of the playing field (excepting the main football pitch) undulates with a series of small ridges and hollows. Water gathers in the hollows and remains for long periods, and the depth of these depressions is such that large parts of the field are unsafe for competitive sport.

135. The application was supplemented with a Flood Risk Assessment and Drainage Strategy (2502-991) (FRA[BS27.1]). The site lies within Flood Zone 1, and while surface water flood mapping and modelling indicate the potential for overland flow and shallow ponding during a 1-in-100-year event (plus 40% climate change), these flows are managed within the site boundary. The 1 in 1 year greenfield run off rate is calculated to be 4.93 l/s and the 1 in 100 year event run off rate is calculated to be 18.51 l/s. Orifice flow control chambers will be used to restrict flows to 4.9 l/s before discharge to the Thames Water surface water sewer, which is in line with the 1 in 1-year greenfield runoff rate.

136. The strategy includes below-ground attenuation and permeable sub-bases designed to accommodate these events, with exceedance flows directed along established routes across the adjacent cricket ground and to the southwest of the site. A technical note was submitted to supplement the FRA which confirms the location and nature of these exceedance routes and any potential temporary pooling areas, to ensure that floodwater is retained and safely dissipated during extreme rainfall.

137. Officers have reviewed the documents submitted and the technical note provides additional confidence in the robustness of the proposed drainage approach. The drawings show that surface water exceedance routes travel in a southwestern direction to a low point in the south western corner away from the MUGAs,

rather than pooling on lawned areas of the site which is preferred during an exceedance event. Localised surface water flooding risks are also mitigated through the removal of local low points as part of the proposed works.

138. It is therefore considered that the proposed exceedance route will not pose a threat to infrastructure to the south-west of the site and no vulnerable infrastructure has been identified to be affected by the proposed exceedance route.

139. Overall, the submitted Flood Risk Assessment and Drainage Strategy, together with the supplementary technical note, demonstrate that the development would be appropriately designed to manage surface water and respond to the site-specific drainage constraints. The proposed use of permeable subbases, below ground attenuation and clearly defined exceedance routes ensures that surface water will be safely contained within the site and directed away from sensitive areas during extreme rainfall events. The Local Lead Flood Officer has confirmed that the strategy is robust and that no unacceptable risks would arise for the site itself or surrounding land. When considered against the requirements of Policies BSUI3 and BSUI4 of the Brent Local Plan, which seek to minimise flood risk, manage overland flows and secure effective surface water control, the proposals are judged to provide an appropriate and policy compliant drainage solution. The development is therefore acceptable in flood risk and drainage terms.

## **Fire Safety**

140. Policy D12 of the London Plan requires all new development to take account of fire safety in design. 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.

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

- a) the building's construction: methods, products and materials used, including manufacturers' details
- b) 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
- c) features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans
- d) 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
- e) how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building
- f) ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.

142. A Fire Risk Assessment accompanies this application. This Fire Risk Assessment has been prepared in accordance with the Regulatory Reform (Fire Safety) Order 2005 (FSO) and applies the risk profiling and management level assessments of British Standard BS9999.

143. This fire risk assessment also considers the guidance and recommendations set out within BB100: Design for fire safety in schools and government publications including, Fire risk assessment: educational premises, which provides guidance on how to comply with fire safety law, fire risk assessment and identify the general fire precautions that must be in place.

144. As the proposal is for external sports pitches, it is considered that the same fire procedures as outlined for the main school building would be carried out. This includes fire access and engine positioning, evacuation procedures and assembly points.

145. It is considered that the submitted fire statement 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 be carried out.

## **Equalities**

146. 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

147. The proposal seeks to provide two new artificial sports pitches with associated fencing, lighting and the relocation of the existing cricket facility. These facilities would significantly improve the school's ability to deliver year-round sporting activities, reduce problems associated with the existing waterlogged playing field, and provide enhanced opportunities for community use secured through a formal Community Access Plan. The development therefore represents a substantial improvement to local social and sports infrastructure, consistent with London Plan policies and Brent Local Plan policies, which collectively support enhanced education and community sports facilities.

148. In design and layout terms, the proposed pitches, fencing and lighting infrastructure would sit comfortably within the established school environment. The use of lightweight and permeable materials, together with appropriate colours, ensures that the structures would not appear unduly visually intrusive or undermine the open character of the wider site, playing fields or surrounding open space. Subject to the detailed lighting and design conditions recommended, the development is considered to comply with Local Plan policies and the principles of Brent's Design Guide SPD1.

149. The development would give rise to some additional visual and lighting impacts, particularly relating to the floodlighting columns. However, these elements have been carefully sited and designed, and the submitted lighting assessment demonstrates that illumination spill would be minimal and would not unduly reach sensitive residential façades. Conditions restricting hours of operation provide further safeguards. Any limited harm to the setting of nearby heritage assets (including Roe Green Village Conservation Area, Roe Green Park and Kingsbury Manor) would be limited and less than substantial and, having regard to the NPPF, is considered to be decisively outweighed by the public benefits arising from improved school and community sports provision.

150. The proposal has been assessed in detail in relation to neighbouring amenity, including potential impacts from noise, lighting, activity, and the height of boundary fencing. Taking account of separation distances, existing vegetation, proposed acoustic mitigation and conditions limiting hours of use, officers consider that the scheme would not result in unacceptable harm to the amenity of neighbouring residential properties. This is consistent with Local Plan Policy DMP1 and the guidance within Brent's Sustainable Environment and Development SPD (2023).

151. In environmental terms, the application is supported by a comprehensive Flood Risk Assessment and Drainage Strategy which demonstrates that the development would not increase flood risk on the site or elsewhere, in accordance with policy. The ecological surveys and subsequent amendments ensure that lighting impacts on bats and priority habitats are minimised, secured via condition, and that necessary precautionary measures for Great Crested Newts are secured. The scheme also achieves a substantial biodiversity net gain of +39.66%, exceeding the statutory minimum of 10%, and a Biodiversity Gain Plan will be secured through the statutory BNG condition to ensure long term habitat delivery and management.

152. Transport impacts have been assessed, with the existing 83 space car park identified as more than sufficient to accommodate anticipated community use outside school hours. The proposal would not materially affect highway capacity or safety, and the submitted Travel Plan will further promote sustainable travel behaviour.

153. Overall, the proposal delivers clear educational, health and community benefits, supports the aims of good growth set out in the London Plan, and provides high quality sports facilities that are well integrated into their context. Any identified impacts relating to lighting, noise, heritage and ecology are limited in scale and would be appropriately mitigated by conditions. When considered as a whole, the proposal is judged to accord with the development plan.

154. It is therefore recommended that planning permission be granted, subject to the conditions as set out in this report.



**Brent**

**DECISION NOTICE – APPROVAL**

Application No: **25/0810**

To: Ransome  
ADP LTD  
1 Kolo Walk  
Colchester  
CO4 6ER

I refer to your application dated **19/03/2025** proposing the following:

Proposed construction of Multi Use Games Area (MUGA) Facility and cricket pitch and netting with fencing and lighting to the school.

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

at **Kingsbury High School, Princes Avenue, London, NW9 9JR**

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: 24/06/2026

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 the:

National Planning Policy Framework (2024)  
The 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:

1401-PL-001 REV A Site Location Plan  
1401-PL-002 REV B Existing Block Plan  
1401-PL-004 REV A MUGA Pitches and Details  
1401-PL-005 REV A Cycle Shelter Details  
1401-PL-003 REV L Proposed Block Plan

Supporting Documents

SK001 Surface Water Drainage Strategy Sheet 1  
SK002 Surface Water Drainage Strategy Sheet 2  
Air Quality Neutral Assessment produced by ACP dated March 2025  
Flood Risk Assessment and Drainage Strategy produced by INGENT dated March 2025  
Tree Condition Survey dated September 2023  
Outdoor Lighting Report produced by MMA Lighting Consultancy dated 20 June 2025  
Sports Pitch Lighting Strategy (MMA19219/001 Rev R1) produced by MMA Lighting Consultancy  
Sports Lighting Design Strategy produced by MMA Lighting Consultancy dated 23rd June 2025  
Non licenced Mitigation Plan: Great Crested Newts Rev 2 produced by Arbtech dated 3rd July 2025  
Flood Risk Assessment and Drainage Strategy dated March 2025 and 2502-991 Technical Note 01  
Ecological Impact Assessment produced by ACP dated July 2025  
Arboricultural Impact Assessment produced by Rootcause dated 22nd June 2026  
Travel Plan Statement produced by FTP dated September 2025

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

- 3 The development shall be carried out in accordance with recommendations set out within the 'Flood Risk Assessment and Drainage Strategy' dated March 2025 and '2502-991 Technical Note 01', including the ongoing maintenance schedule throughout the lifetime of the development, unless alternative details are first agreed in writing by the Local Planning Authority.

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

- 4 The development shall be carried out in accordance with the submitted 'Arboricultural Impact Assessment' incorporating the arboricultural method statement and tree protection plan, dated 22nd June 2026, unless otherwise agreed in writing by the Local Planning Authority.

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

- 5 The development shall be carried out in accordance with the submitted 'Travel Plan Statement' dated September 2025.

Reason: In order to aid a reduction in traffic congestion and promote sustainable modes of travel.

- 6 The use of the two artificial pitches shall not be brought into use until the relocated cricket square and associated ball stop netting have been installed.

Reason: To ensure there is a continuation of cricket at the site.

- 7 The development shall be carried out in accordance with the Mitigation and Enhancement measures as specified in the submitted 'Non licenced Mitigation Plan: Great Crested Newts' document dated 3rd July 2025.

Reason: To safeguard the protecting of Great Crested Newts throughout the lifetime of the development including the construction phase.

- 8 The "Habitat Protection" measures set out within the Ecological Impact Assessment (EclA) prepared by ACP Consultants Ltd dated July 2025 shall be fully adhered to throughout the constructions works.

Reason: In the interests of ensuring that protected species are protected during construction works.

- 9 The cycle parking spaces hereby approved shall be installed, as detailed on drawing 1401-PL-005 Rev A, prior to the first use of the development hereby approved and thereafter retained for the lifetime of the development.

Reason: In the interest of highway flow and safety.

- 10 The Multi Use Pitches hereby approved shall not be used other than:

October to March – Between 08:00 to 21:00, with Floodlights to be switched off no later than 21:15.

April – Between 08:00 to 19:30, with Floodlights to be switched off no later than 19:45.

May to August – Between 08:00 to 20:00. Floodlights to be kept off.

September – Between 08:00 to 19:00. Floodlights to be kept off.

Within these time parameters, the relevant pitch shall be vacated, and any floodlights shall be switched off within 15 mins following the end of the use of the relevant pitch. The development shall operate within these parameters at all times and for the lifetime of the development unless first otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure that the proposed use does not prejudice the enjoyment by neighbouring occupiers of their properties in respect of noise and light disturbance, as well as ensuring as far as is practical a minimal impact on ecology.

- 11 The maximum level of illumination for the floodlights shall be carried out in accordance with approved 'Kingsbury High School MUGA Pitches Sports Lighting Design Strategy', (dated 23/06/2025) for the lifetime of the development, unless otherwise agreed in writing by the Local

Planning Authority.

Reason: To ensure that the floodlights are not detrimental to the local ecology or to the amenity of surrounding residential properties.

- 12 The development shall be carried out in full accordance with the mitigation measures outlined within the following submitted document 'Noise Impact Assessment for Proposed Artificial Games Pitches' 20 October 2025 at all times and for the lifetime of the development. The Acoustic Barrier shall be carried out in accordance with the approved drawings, to include no gaps and a density of at least 10kg/m<sup>2</sup> and maintained as such for the lifetime of the development hereby approved.

Reason: To protect the amenity of neighbouring residential properties and ensure acceptable local noise levels, in accordance with Policy DMP1.

- 13 No amplified sound system, public address (PA) system, or relayed music shall be operated within the Multi-Use Games Area (MUGA) at any time without the prior written approval of the Local Planning Authority. Any proposed system(s) shall be submitted to and approved in writing by the Local Planning Authority prior to installation and thereafter only installed and operated in accordance with the details so approved.  
Any temporary use of amplified sound for school-specific events (e.g., sports days) must be limited to between 09:00 and 18:00 hours and shall not be audible at the boundary of the nearest noise-sensitive residential property.

Reason: To safeguard the amenities of the adjoining occupiers.

- 14 The relocated Cricket Square (excluding fencing) shall be designed, constructed and maintained in accordance with England and Wales Cricket Board (ECB) guidance, including Building Bulletin 103 (BB 103), as advised by a competent Sports Agronomist or Fine Turf Consultant.

Reason: To ensure the Cricket Square is constructed and maintained to an adequate standard and fit for purpose, in accordance with Sport England's Playing Fields Policy.

- 15 The Multi-Use Games Areas (MUGAs) / Artificial Grass Pitches (AGPs) (excluding fencing and lighting) shall be designed, constructed and maintained in accordance with the relevant technical design guidance published by Sport England, the Football Association (including the FA Guide to Football Turf Pitch Design Principles and Layouts) and England Hockey (including applicable International Hockey Federation (FIH) certification requirements), as appropriate to each playing surface.

Reason: To ensure the facilities are fit for purpose and sustainable, in accordance with Sport England's Playing Fields Policy and the National Planning Policy Framework, paragraph 104.

- 16 Prior to the installation of the fencing, flood lighting, acoustic fencing, ball stop netting and Multi-Use Games Area (MUGA) surfaces, details of the materials and colours of these elements shall be submitted to and approved in writing by the Local Planning Authority. The details shall include:

- The specification, finish and colour of all perimeter fencing;
- The specification, finish and colour of the flood lighting columns;
- The specification, finish and colour of all acoustic fencing;
- The specification and colour of all ball stop netting and supporting posts; and
- The specification, colour and line markings of the MUGA playing surfaces.

The development shall thereafter be carried out in full accordance with the approved details and retained as such thereafter.

Reason: To ensure a high quality appearance of the development and to safeguard the

character and visual amenity of the surrounding area, in accordance with Policies D3 and D4 of the London Plan (2021), Policy BD1 of Brent's Local Plan (2019–2041), and Brent's Supplementary Planning Document 1 (SPD1).

- 17 Prior to first use of the development, a scheme shall be submitted to and approved in writing by the Local Planning Authority that provides details of all landscaped areas of the development. Such approved landscaping works shall thereafter be completed prior to first use of the development hereby or other timescales as agreed in writing by the Local Planning Authority. The submitted scheme shall include details of:

- a) the planting scheme for the site, which shall include species, size and density of plants and trees, details of the extent and type of native planting and any new habitats created on site;
- b) 18no trees which shall be of a species, size and with maintenance arrangements to ensure they do not overhang the MUGA during the MUGA's lifetime;

Any trees and shrubs planted in accordance with the landscaping scheme and any plants which have been identified for retention within the development which, within 5 years of planting, are removed, dying, seriously damaged or become diseased, shall be replaced to the satisfaction of the Local planning Authority, by trees and shrubs of similar species and size to those originally planted.

Reason: To ensure a satisfactory appearance and in the interests of the amenities of the locality.

- 18 Prior to first use of the sports pitches hereby approved, a Community Access Plan detailing community access arrangements, prepared in consultation with Sport England, shall be submitted to and approved in writing by the Local Planning Authority.

The Community Access Plan shall outline a minimum number of hours for community use each week (during term time and during school holidays), details of rates of hire, terms of access and booking (including mechanisms to ensure booking availability for non-block/individual bookings), hours of community use (during school terms and school holidays), access by non-school users/non-members and management responsibilities including security measures and noise management.

The Community Access Plan must demonstrate access to a diverse community and make specific reference to how access would be made available for households on low incomes.

The approved Community Access Plan shall be brought into operation within 3 months of first use of the sports pitches and it shall remain in operation for the duration of the use of the development.

Reason: To secure well-managed, safe community access to the sports facility, to ensure sufficient benefit to the development of sport and to accord with the Local Plan.

## INFORMATIVES

*1 - 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.*

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 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>

3 - Guidance on preparing Community Use Agreements is available from Sport England.

<http://www.sportengland.org/planningapplications/>

It is recommended that the applicant seeks guidance from the Football Foundation and England Hockey on pitch construction when determining the community use hours the artificial pitch can accommodate.

Any person wishing to inspect the above papers should contact Brooke Storey-Vowles, Planning and Regeneration, Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ, Tel. No. 020 8937 3738

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## COMMITTEE REPORT

Planning Committee on  
Item No  
Case Number

2 July, 2026  
06  
25/1022

## SITE INFORMATION

RECEIVED	3 April, 2025
WARD	Brondesbury Park
PLANNING AREA	Brent Connects Kilburn
LOCATION	Thanet Lodge Garages, Mapesbury Road, London
PROPOSAL	Demolition of garage block and erection of a new dwellinghouse with associated amenity space, provision for new pedestrian access and cycle and refuse storage and creation of additional hardstanding to allow reconfiguration of the parking layout (amended description)
PLAN NO'S	See condition 2
LINK TO DOCUMENTS ASSOCIATED WITH THIS PLANNING APPLICATION	<p><b><u>When viewing this on an Electronic Device</u></b></p> <p>Please click on the link below to view <b>ALL</b> document associated to case  <a href="https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&amp;keyVal=DCAPR_172974">https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&amp;keyVal=DCAPR_172974</a></p> <p><b><u>When viewing this as a 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 "25/1022" (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 the 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. A requirement to submit the Statutory Biodiversity Metric to identify the pre-development biodiversity value of the site prior to commencement of development.
4. In the event that the house is not construction as a self-build in line with the legal definition of Self Build and Custom Build Housing or subsequently sold or occupied for persons other than the applicant within 3 years after the house is completed to notify the Council in writing. The owner would then be required to secure off site BNG units either through registered offsite biodiversity gains or statutory biodiversity credits to secure the 10% net gain in biodiversity, with such evidence submitted to the Council.
5. Any other planning obligation(s) considered necessary by the Head of Planning.

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

That in the event that the Section 106 Agreement is not completed, the Head of Planning and Development Services or other duly authorised person is delegated authority to refuse the application due to the lack of a completed Section 106 Agreement.

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

### Conditions

1. Three-year commencement rule
2. In accordance with approved plans
3. Obscured glazed
4. Water Consumption
5. Accessible Home
6. Bin and cycle store compliance
7. Replacement Trees within wider site
8. Compliance with extended car park area
9. External Materials
10. Hard/ soft landscaping and lighting details

### Informative

1. BNG exempt
2. Party Wall Act
3. Building Near Boundary
4. CIL Liability

1. That the Head of Planning and Development Services 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, informatives, 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

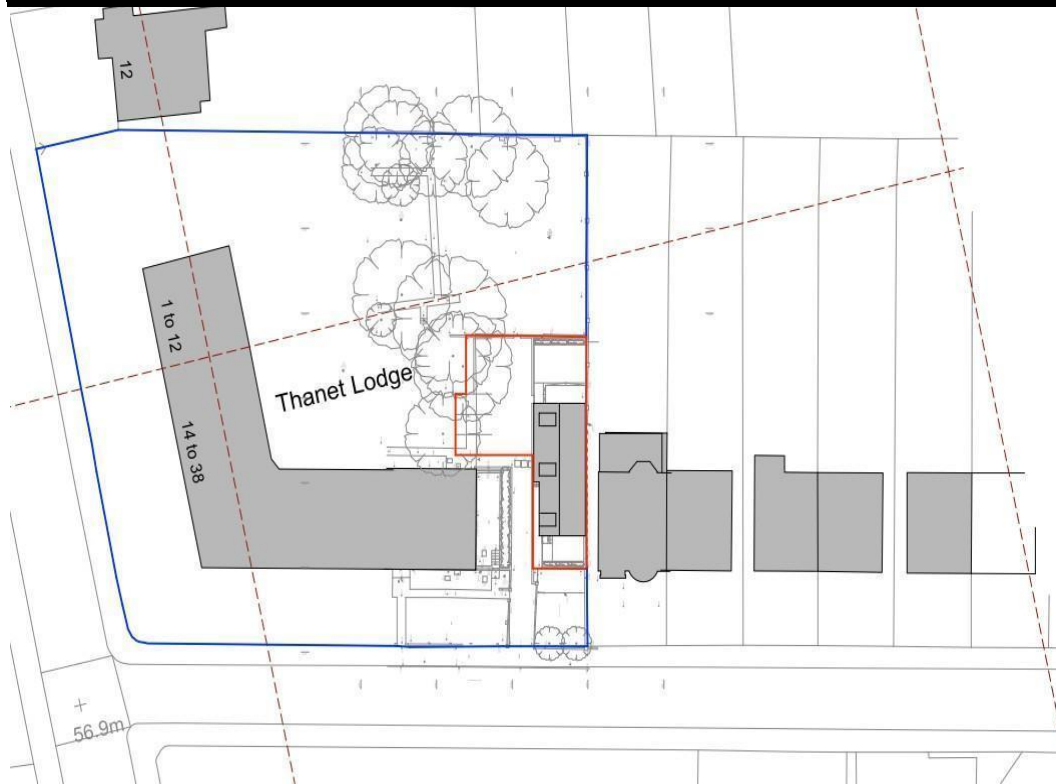


## Brent

### Planning Committee Map

Site address: Thanet Lodge Garages, Mapesbury Road, London

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This map is indicative only.

## PROPOSAL IN DETAIL

Demolition of garage block and erection of a new dwellinghouse with associated amenity space, provision for new pedestrian access and cycle and refuse storage.

## EXISTING

This application relates to a single storey garage plot which sits to the eastern side of Thanet Lodge which is an L-shaped building located on a corner plot fronting both Mowbray Road to its south and Mapesbury Road to its west. Thanet Lodge is 4-5 storey high and contains 43 residential flats, with a large plot of amenity space to the rear.

The application site also contains a shipping container to the rear of the garage block and an area of hard standing that is used for off street parking accommodating up to three car parking spaces.

The site is located in the Brondesbury Conservation Area (a designated heritage asset) but does not contain any listed building and is not located in close proximity to a listed building.

## AMENDMENTS SINCE SUBMISSION

Minor revisions have been made to the fenestration, materials and dormer sizes as well as a slightly reduced width.

An addendum to the daylight and sunlight report has been received which provides a no-sky line/daylight distribution test to the neighbouring amenities of the basement flat of no.43 Thanet Lodge and the adjoining no.45 Mowbray Road.

A revision has been made to the proposed site plan to show a reduction in car parking spaces to 4, reduced from 6, while some further detail on the tree pits closest to these parking spaces has also been provided.

## 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 deciding on the application:

**Representations Received:** Representations were received from 18 objectors and 2 neutral comments. A number of issues were raised. The objections have been considered and are summarised in more detail below and discussed in the report.

**Principle of Development:** The London Plan and Brent's Local Plan recognise the role of small sites in the delivery of new homes that are needed in the borough. The site has a Public Transport Accessibility Level (PTAL) of 4 and is within a priority area for housing. The general principle of residential development is supported in this location, contributing towards the Council's housing targets. The site has an extant planning permission for the demolition of the existing garages and construction of a dwelling.

**Design and appearance:** The proposal is considered to represent a good standard of design within the site and would not result in a harmful impact on the character and appearance of the Brondesbury Conservation Area.

**Highway impacts:** The site is within an area with good PTAL of 4 for public transport. The proposal would result in the loss of six garages and an area of hardstanding to the rear that could accommodate 3 parking spaces. The plans show that alterations would be made outside of the site within land that is in the same ownership of the applicant to create 4 car parking spaces off-street which would be a reduction from the existing 8-9 spaces. Transportation officers have reviewed the proposal and consider that there would be sufficient capacity taking into account both the proposed off-street parking provision and on-street parking availability on the surrounding streets. The new home would be provided with secure and covered cycle parking as well as refuse storage.

**Residential amenity:** The proposal would not result in a significant impact on the residential amenities of Thanet Lodge occupiers in terms of noise and disturbance, daylight and sunlight or overlooking to any immediate adjoining residential neighbours having regard to the provisions in SPD1. In relation to 45 Mowbray Road, the submitted information shows that the eaves of the proposed building will be above the SPD1 45 degree line but set below the parapet height of the existing garages, with a pitched roof that rises above the height of the existing roof away from the boundary. The rearward 2.55 m (approx.) of the proposed building is situated to the rear of the existing garages, with a storage container situated in this location. The eaves of the proposed building are approximately 0.55 m above the height of the container and the proposal results in additional impact beyond that of the existing container. This impact must be balanced against the benefits of the proposal.

**Trees, landscaping, and ecology:** The proposal would not result in the loss of any trees within the application site. The proposal would increase the amount of soft landscaping within application site, and there are opportunities for enhancements, and such details would be secured through a planning condition.

**RELEVANT SITE HISTORY**

**Application reference: 24/0296**

Proposal: Proposed part demolition of garage block and erection of a single storey dwellinghouse with associated amenity space, alterations to boundary treatment and provision for new pedestrian access, cycle and refuse storage.

Outcome: Application granted at planning committee, decision issued 08.08.2024

**Application reference: 20/0600**

Proposal: Proposed part demolition of garage block and erection of a single storey dwellinghouse with associated amenity space, alterations to boundary treatment and provision for new pedestrian access, cycle, and refuse storage

Outcome: the application was dismissed by the planning inspectorate following an appeal made by the applicant against the non-determination of the application from the council. Appeal date 21.05.2021.

**CONSULTATIONS**

The application was originally consulted on 24th April 2025 for a 21 day consultation period with letters sent to 66 addresses. Re-consultation was carried out on 2nd December 2025 and on 29th May 2026 (both for 21 days) following amendments to the scheme to extend the area of hardstanding to accommodate a rearranged car parking area.

The application was also advertised in the local press and through a site notice.

In total 20 objections have been received (some of which submitted multiple comments and 7 did not provide an address). These representations raise the following matters:

Reasons for objecting	Officer Comment
Poor design and overdevelopment	This will be addressed in the design and heritage impact section of this report.
Adverse impact on air quality ventilation of neighbouring properties	This is assessed further in the air quality section of this report.
Issues with construction management and its impact on driveway and associated noise and	It is acknowledged that construction works would lead to some degree of noise and disturbance to neighbouring properties and will affect traffic movement. Any statutory nuisance is addressed

pollution impact. Additional concerns raised with maintenance of party walls during and after construction.	through environmental health legislation. The proposal itself for one new home would be appropriate for the residential context of the wider area and would not result in noise levels beyond that type experienced for a residential dwelling. Party wall issues are not material planning considerations however an informative has been attached advising the developer of their obligations during construction to mitigate against party wall issues.
Adverse impact on character and appearance of conservation area	This is discussed in the design and heritage impact section of this report.
Issues with refuse areas, potential for odours and pests	The proposal is considered to have sufficient refuse storage, and the refuse can be easily served from the front of the site. Issues related to potential for odours need not be a significant concern with appropriate management. There is also a quality of accommodation section in this report which addresses this further.
Lack of information on drainage, waste, and utilities	The submitted design and access statement does provide some information on these matters. It is noted that the proposal would offer similar measures to that as previously approved under the application 24/0296 and so are therefore considered to be acceptable for this application.
Adverse impact on light and ventilation to residents in wider site and neighbouring sites	This will be assessed in the neighbouring amenity section of this report.
Loss of outlook	This will be addressed in the quality of accommodation section of this report.
Loss of privacy/overlooking	This will be assessed in the neighbouring amenity section of this report.
Reduced parking availability and increased on-street parking stress.	This will be assessed in the highways section of this report.
Concerns with impact on the safety and usability of existing access, refuse and parking arrangements.	A separate footway is proposed for pedestrians to the new house, so that they do not need to share the narrow driveway with vehicles. Therefore, it is considered this would ensure adequate safety for future occupiers.
Proposal fails to achieve high levels of sustainability	This will be addressed in the energy and sustainability section of this report.
Concerns with fire safety	This is considered in section 9 of this report. Detailed fire safety regulations are covered by building control standards.
Loss of green space	This is covered in section 3 of this report. The communal garden area to the rear of the site would not be reduced as a result of the development.

Issues have also been raised regarding the maintenance works carried out to the existing buildings on site, potential structural issues to the garages and neighbouring buildings, and issues relating to the freeholders'

legal rights to develop on this land and issues relating to paying for the service charge of the building.

However, these are not material planning considerations and so will not be addressed further in this report.

Issues have also been raised regarding applications on previous works by the freeholder and impacts relating to damage, disruption and costs to residents. However, each application is assessed on its own merits and officers can only consider the planning merits of the scheme. No further comment will be made on this matter in the report.

## **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 as is relevant to this proposal is comprised of the:

London Plan 2021

Brent Local Plan 2019-2041

Key policies of the London Plan 2021 include:

GG2: Making the best use of land.

GG4: Delivering the homes Londoners need.

D3: Optimising site capacity through the design-led approach

D4: Delivering good design.

D6: Housing quality and standards

D7: Accessible housing

D12a: Fire Safety

H1: Increasing housing supply.

H2: Small sites

HC1: Heritage conservation and growth

G5: Urban greening

G6: Biodiversity and access to nature

G7: Trees and woodlands

SI5: Water infrastructure

SI 13: Sustainable drainage

T5: Cycling

T6: Car parking

T6.1: Residential parking

T7: Deliveries, servicing, and construction

Key policies of the Local Plan 2019-2041 include:

DMP1 – Development Management General Policy

BD1 – Leading the way in good design.

BH1 – Increasing Housing Supply in Brent

BH2 – Priority Areas for Additional Housing Provision within Brent

BH4 – Small Sites and Small Housing Developments in Brent

BH13 – Residential Amenity Space

BHC1 – Brent's Heritage Assets

BGI1 – Green and Blue Infrastructure in Brent

BGI2 – Trees and Woodland

BSUI4 – On-Site Water Management and surface water Attenuation

BT2 – Parking and Car Free Development

The following are also relevant material considerations:

National Planning Policy Framework 2024

Brent Waste Planning Guide 2013

Brent's Design Guide – Supplementary Planning Document 1 2018

Residential Amenity Space & Place Quality – SPD – 2023

Sustainable Environment & Development – SPD – 2023

## **DETAILED CONSIDERATIONS**

### **Background**

1. The proposal involves the demolition of the existing garage block and the removal of the shipping container sited behind the garage, and the erection of a single storey dwellinghouse with associated amenity space to the front and rear of this dwellinghouse, alterations to boundary treatment and the provision for a new pedestrian access along the western flank elevation of the building. New cycle and refuse storage would be added to the front. The area of hardstanding to the rear would be replaced with the rear amenity space for the new dwellinghouse.
2. The new dwellinghouse would replicate the footprint of the existing garage block and shipping container to the rear (but be set further away from the road frontage). The plans show that the majority of the garage block would be demolished other than the existing boundary wall to be retained along the boundary with No. 45 Mowbray Road. The shipping container would also be removed.
3. An application for the demolition of the garage block and the erection of a new dwellinghouse was

previously considered under planning reference 24/0296 where planning committee resolved to grant consent at the meeting on 7th August 2024. The planning permission was granted on 8th August 2024. The approved consent differs from the current proposal in design merits (as explained in the design and heritage impact section of this report) whereas the current proposal offers a family-sized (3-bedroom) home compared to the approved 2-bedroom home.

4. The extant permission referred to above forms a material consideration when assessing the subject application.

### **Principle of development**

5. Policy BH1 sets out the need for the Council to maximise the opportunities to provide additional homes in the period to 2041, with a minimum 23,250 homes in the period 2019/20-2028/29 and a minimum of 46,018 homes in the period 2019-20-2040/41. The policy identifies Growth Areas, site allocations, and appropriate windfall sites to support the delivery of the additional homes.
6. Policy BH2 sets out priority areas for additional housing provision within Brent. In addition to the Growth Areas and Site Allocations, policy BH2 identifies town centres, edge of town centres, areas with higher levels of public transport accessibility levels and intensification corridors as priority location where the provision of additional homes would be supported.
7. Policy H2 of London Plan identifies that for London to deliver more of its housing, a substantial contribution from smaller sites below 0.25 hectares in size will be required. It sets a Brent minimum target of 4,330 for the period 2019/20 – 2028/29. Policy BH4 relates to small sites and small housing developments in Brent ((below 0.25 hectares or 25 dwellings in size) and in line with policy H2 of London Plan, sets out that small housing developments delivering a net addition of self-contained dwellings through the more intensive and efficient use of sites, where consistent with other policies in the development plan, will be supported within the priority locations of PTAL 3-6, intensification corridors, or a town centre boundary 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
8. In these priority locations, the character of the existing area will be subject to change over the Local Plan period. Outside the priority locations greater weight will be placed on the existing character of the area, access to public transport and a variety of social infrastructure easily accessible on foot when determining the intensity of development appropriate.
9. Policy BH4 highlights that developments that demonstrably fail to optimise potential housing delivery on a site or prejudice more comprehensive development particularly that of a site allocation, will be refused.
10. The site lies within PTAL 4 and is therefore within a priority location for housing. The principle of the development is therefore acceptable.

### **Design and heritage considerations**

#### *Policy context*

11. Policy DMP1 sets out the need for development proposals to be:
  - (a) of 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

12. 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.
13. 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.
14. Section 72(1) of the Planning (Listed Building and Conservation Area) 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.
15. 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. Paragraph 208 goes on to say 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.
16. When considering the impact of a proposed development on the significance of a designated heritage asset, paragraph 212 of the NPPF highlights that 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 (paragraph 212).
17. Where a proposed development will lead to substantial harm to (or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss (paragraph 214).
18. Where a development proposal will lead to less than substantial harm significance of a designated heritage asset, paragraph 215 of the NPPF highlights that the harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

#### *Assessment*

19. The site is located within the Brondesbury Conservation Area. In terms of the significance of the conservation area, the Brondesbury Conservation Area (a designated heritage asset) is characterised by grand Victorian Villas built in the main by William Hancock between 1883 and 1886, as set out in the Brondesbury Conservation Area Character Appraisal. The garages are situated alongside a pair of such Victorian villas, and the rest of the street is well preserved with such villas along one side. The character appraisal makes the point that the villas are separated by blocks of flats. Opposite, long gardens and open character and later infill development.
20. This site forms the garages to Thanet Lodge which was constructed around 1938. The garages are contemporary with its construction, single storey, and of no special interest. Therefore, these features do not contribute to the character and appearance of the conservation area and no objection is raised to their loss.
21. The proposed new dwelling would result in a similar footprint to the existing garages and the new dwellinghouse approved as part of the 2024 consent. The proposed height would be larger than the existing garages and the extant permission and would incorporate a pitched roof design (increasing the overall height by approx. 2.4m to the ridge), however the eaves line would be similar to the garages which would restrict the massing to some degree and limit an overbearing appearance. The addition of new fenestration to the front would be an enhancement in visual terms to the character and appearance of the host property and wider streetscene.
22. Following amendments, the revised drawings show that projecting coping stone to be used with the roof set lower, behind. The roof would be made of red clay pantiles. Some minor amendments have also been made to ensure that the fenestration and dormer windows would be more proportionate with each other,

to improve the visual appeal of the proposal in this setting. Brent's Principal Heritage Officer has advised that based on the revised drawings that the proposal would preserve the character and appearance of the conservation area.

23. The existing front garden area/setting will remain the same, including the existing brick boundary wall and fence and grassed area while a new laurel hedge would be added directly in front of the cycle storage area behind the front brick wall to the new house. A detailed section has been provided which shows the brickwork bonding, brick plinth, lintels, fenestration, and parapet. This confirms that the overall appearance will match that of Thanet Lodge and that it will be in keeping with character of the locale. It will not look out of place and will preserve the character and appearance of the conservation area.
24. SPD1 also states that building materials should be durable, attractive and respect local character. This has been shown on the submitted drawings; however, officers will attach conditions requiring further details of the brickwork proposed and of the cycle and refuse storage before full completion of the development.
25. In conclusion, as discussed above, the proposal would not be considered to result in harm to the significance of the Brondesbury Conservation Area as discussed above. It would preserve the character and appearance of the Brondesbury Conservation Area.

### **Impact to neighbouring amenities**

#### *Policy context*

26. 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.
27. Regarding daylight, sunlight and outlook impact, Brent's SPD1 Design guidance states that 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 two metres 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 two metres.
28. Furthermore, 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.
29. 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 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.
30. 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.
31. 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.

32. The distribution of daylight within a room can be calculated by plotting the 'no sky line'. The no skyline is a line which separates areas of the working plane that do and do not have a direct view of the sky. Daylight may be adversely affected if, after the development, the area of the working plane in a room which can receive direct skylight is reduced to less than 0.8 times its former value. The BRE guide states that both the total amount of skylight (Vertical Sky Component) and its distribution within the building (Daylight Distribution) are important. The BRE guide states that the daylight distribution calculation can only be carried out where room layouts are known.
33. A daylight/sunlight impact assessment has been submitted as part of this application created by Point 2 Surveyors limited, 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).
34. 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.

#### *Assessment*

35. The proposal site adjoins neighbouring residential properties of no's 45 Mowbray Road to the east of the site which contains 4.no flats between basement and second-floor level and to the west the existing residential units within Thanet Lodge, which have side facing windows and doors that face into the development. The site also adjoins some communal garden space to the rear which belongs to Thanet Lodge.

#### *45 Mowbray Road*

36. In terms of privacy the new dwellinghouse would not contain any flank wall windows or roof lights that would result in direct overlooking into the habitable room windows or rear garden of No. 45 Mowbray Road.
37. The new dwellinghouse would not project any deeper into the rear garden from the lower ground floor flat at No. 45 Mowbray Road compared to the existing garages and shipping container. These currently project approximately 3.36m beyond the existing single storey rear extension. The height of the eaves of the new dwellinghouse would be marginally lower than the parapet height of the existing garages but the pitched roof would slope upwards away from No. 45 Mowbray Road by an additional 2.28m above the existing parapet level. This would result in a total height of approximately 7.1m from the ground level of No. 45 Mowbray Road, so when viewed from the rear garden and rear habitable room windows there would be an increased sense of enclosure and overbearing appearance. The rearward element (approx. 2.55 m deep) of the proposed house would be situated in the location of the shipping container, with the height of the shipping container approximately 0.55 m lower than the parapet of the existing garage. As such, the construction of the proposed house would result in an increase in the height adjacent to the boundary and an associated increase in impact on No. 45. The sloping nature of the roof reduces the impact of the additional height and it is noted that the extension is open plan with a number of windows and doors within the rear elevation and the overall garden remains with a sense of openness. Nevertheless, the proposal would result in additional impact that must be weighed against the benefits of the proposal.
38. The daylight and sunlight report demonstrates that all windows of No. 45 Mowbray Road will exceed BRE guidance levels, with VSC reducing up to a maximum of 5.1% and daylight distribution reducing by up to a maximum of 1%. The proposal would not result in a noticeable affect on daylight to the flats within No. 45 Mowbray Road and indeed some cases would see an improvement upon the existing conditions. Likewise, the scheme would result in a loss of 1% of sunlight to the area of rear garden at No. 45 Mowbray Road receiving at least two hours of sunlight on 21st March and would therefore fully comply with BRE guidelines. There would not be a noticeable impact to sunlight to this rear garden.

## *Thanet Lodge*

39. In terms of privacy, the proposed side facing windows, would be obscure-glazed and fixed shut as outlined on the proposed drawings to mitigate against loss of privacy/overlooking to the Thanet Lodge side windows which are positioned approximately 8.4m away from the proposed side windows. It is also noted that the windows at basement level within this block face onto a boundary treatment which would also function as a screen to prevent direct overlooking. The front and rear facing habitable room windows would not directly face any neighbouring properties. Therefore, the proposal would not result in a significant loss of privacy/overlooking impact.
40. Thanet Lodge contains a basement flat at No. 43 Thanet Lodge which has habitable room windows that face onto to the access road and the new dwellinghouse. Direct overlooking is screened by the sunken terrace directly outside No. 43 Thanet Lodge which sits lower to the access road. The new dwellinghouse would not breach 45 degree line when measured from the sunken terrace.
41. Additionally, a revised daylight and sunlight assessment has been submitted by the applicant which includes a daylight distribution/ no sky-line assessment to demonstrate the impact to the existing basement flat at no.43 Thanet Lodge adjacent to where the proposed house would be, as well as considering the impact to the sites neighbouring properties of 45 Mowbray Road and 1-38 Thanet Lodge.
42. The impacts to daylight and sunlight in relation to Thanet Lodge have been tested. Windows that face the development between the ground and second floor have been tested for VSC. However, the development would fall below the 25 degree line for windows of the ground floor flats and those above, so the development would comply with BRE guidance for those flats without the need for further testing to be undertaken. Both VSC and Daylight Distribution have been tested for the basement flat. Levels of VSC have been shown to reduce by up to 1.6 %, comfortably within the 20 % level specified in guidance. In relation to Daylight Distribution, levels have been shown to reduce by 2 % for the Kitchen / Living / Dining room and 31 % for the bedroom. Therefore, while levels of light to the bedroom achieve BRE guidance levels when assessed for VSC, levels of reduction for the bedroom go beyond the 20 % guidance level in relation to Daylight Distribution. The hallway would experience no loss in relation to Daylight Distribution.
43. Whilst the BRE guide gives numerical guidelines, the guide states that these should be interpreted flexibly, since natural lighting is only one of many factors in site layout design. The BRE guidance also states that bedroom windows target for light is far less than for other habitable rooms (kitchen 200 lux, living room 150 lux, bedroom 100 lux) and in this instance the levels of light achieved to the living/dining/kitchen space is in accordance with the guidance for daylight distribution and VSC. When also considering the level of daylight distribution levels to this neighbouring hallway would be in accordance with the BRE guidelines, it is considered that the level of daylight received to this flat overall would be acceptable. Furthermore, there would be no loss of sunlight to the external amenity spaces within Thanet Lodge.
44. Impacts of development must also be balanced against the benefits of a proposal. There is a significant need for new homes and in particular, family sized homes. This need is not just for Affordable homes, with a significant number of private homes also required. The proposal would result in the provision of a new home which will help to meet housing need in Brent which is considered to be a significant benefit. While the report does establish some harm to the bedroom window of no.43 Thanet Lodge, the proposal would meet BRE guidelines in relation to all other windows as well as having an acceptable impact to garden spaces in these respects.
45. Overall, the impacts of the proposal on a bedroom of an adjoining flat is considered to be significantly outweighed by the benefits of the proposal.

## **Quality of accommodation**

### *Internal amenity space*

- 46.** Policy D6 of London Plan sets out that housing developments should be of high-quality design and provide adequately sized rooms with comfortable and function layouts which are fit for purpose and meet the needs of Londoner's without differentiating between tenures. Part (c) highlights that housing developments should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in Policy D3 Optimising site capacity through the designed approach than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.
- 47.** Part F of Policy D6 sets out that housing developments are required to meet the minimum standards below which apply to all tenures and all residential accommodation that is self-contained:
- 48.** Dwellings must provide at least the gross internal floor area and built-in storage area set out in Table 3.1, which includes the following:
- 1. A dwelling with two or more bedspaces must have at least one double (or twin) bedroom that is at least 2.75m wide. Every other additional double (or twin) bedroom must be at least 2.55m wide.*
  - 2. A one bedspace single bedroom must have a floor area of at least 7.5sq.m. and be at least 2.15m wide.*
  - 3. A two bedspace double (or twin) bedroom must have a floor area of at least 11.5sq.m.*
  - 4. Any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (If the area under the stairs is to be used for storage, assume a general floor area of 1sq.m. within the Gross Internal Area).*
  - 5. Any other area that is used solely for storage and has a headroom of 0.9-1.5m (such as under eaves) can only be counted up to 50 per cent of its floor area, and any area lower than 0.9m is not counted at all.*
  - 6. A built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements but should not reduce the effective width of the room below the minimum widths set out above.*
  - 7. Any built-in area in excess of 0.72sq.m. in a double bedroom and 0.36sq.m. in a single bedroom count towards the built-in storage requirement.*
  - 8. The minimum floor to ceiling height must be 2.5m for at least 75 per cent of the Gross Internal Area of each dwelling*
- 49.** The proposal would create a new residential home which would be over two-storeys, containing 3x double bedrooms thus would be a 3-bedroom 6-person unit. As set-out in table 3.1 of the London Plan, a unit of this size would require a GIA (gross internal area) of 102sqm, and each bedroom would require a GIA of 11.5sqm and a minimum width of 2.75sqm for at least one bedroom with the others to achieve at least 2.55m width. The proposal complies with this standard for bedrooms and provides a surplus on the GIA requirement, providing approx. 133sqm GIA.
- 50.** While the proposal only includes 1.9sqm approx. of built in storage space, given the surplus in GIA, the dwelling could easily be reconfigured to accommodate the additional storage space.
- 51.** The proposed dwelling would contain at ground floor level the living/kitchen/dining room at the rear and a bedroom at the front. Both of these rooms would be served by outlook in either a northern or southern aspect with the addition of flank wall windows to allow for additional natural light and ventilation. The flank wall windows would be obscure glazed at a height up to approx. 1.8m from internal floor level to maintain privacy to the occupants of the new dwellinghouse given their siting close to the shared access into the wider site. The level of outlook and natural light at ground floor level would be similar to the extant consent with the depth of the front and rear gardens and boundary treatments comparable to the extant permission. It is also noted that the current proposal only contains one bedroom at the front with windows to the front and side elevations whereas the extent permission contained two bedrooms along the front

with only windows on the front elevation. The proposal now includes an additional floor within the pitched roof to accommodate two additional bedrooms. These bedrooms are served by outlook to the front and rear and also contain flank wall dormer windows that face into the access road. The dormer windows are obscured glazed at a height up to approx. 1.95m. The dormer windows allow for additional natural light and ventilation but the rooms do not rely on outlook from the dormers.

52. Boundary treatment in the form of a fence would be added which would have an approx. height of 2.15m is also proposed to the front garden space which would offer a degree of privacy at the front. The proposed cycle storage has been positioned in the front garden but would not obstruct the front windows. The depth of the front garden would allow for sufficient defensible space from the streetscene.
53. London Plan Policy D6 also requires at least 75% of the GIA of the proposed 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. The proposal would meet this requirement.

#### *External amenity space*

54. Policy BH13 sets out that all new dwellings will be required to have external private amenity space of a sufficient size and type to satisfy its proposed resident's 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.
55. Policy D6 of London Plan sets out that a minimum of 5sq.m. of private outdoor space should be provided for 1-2 person dwellings and an extra 1sq.m should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m.
56. The policy highlights that new developments should provide private amenity space to all dwellings, accessible from a main living room without level changes and planned to take maximum advantage of daylight and sunlight.
57. Where sufficient private amenity space cannot be achieved individually for each dwelling to meet the full requirement of the policy; the remainder should be supplied in the form of communal amenity space.
58. 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.
59. The proposal includes private amenity space to the front and rear. The rear private amenity space, which would be the most usable, have an area of 53.7 sqm providing a spacious amenity space that would provide a significant surplus when measured against the minimum 50sqm required for a unit of this size. This space would be directly and easily accessible from the main living room area. Therefore, this space is considered to be acceptable when assessed against the requirements of policy BH13 and also Brent's Residential Amenity Space & Place Quality SPD.

#### *Accessible Homes*

60. In line with London Plan policy D7, the homes should all be delivered to an M4(2) level of fit out, as defined within Part M of the Building Regulations. This will ensure that step free access is provided between the street to all flats and that the flats meet the needs of occupants with differing needs, including some older or disabled people and to allow adaptation of the dwelling to meet the changing needs of occupants over time. The plans indicate that the new dwellinghouse would have step free access. The agent has confirmed that the building would be able to achieve the requirements of Building Regulations and although there would be stepped access to the front of the dwelling, a ramped access would be provided to the rear. Due to the constraints of the site this is considered to be reasonable. It is recommended that a condition is secured for it to be designed to achieve M4(2) requirements. It is recommended that a condition is secured for it to be designed to achieve M4(2) requirements.

### *Noise and disturbance*

61. There would be a degree of noise and disturbance from the proposal new dwelling close proximity to the remaining parking area serving Thanet Lodge. However, the proposal does not have an unusual siting for a new dwelling and would sit over the footprint of the extant permission, therefore, reasonable use as a residential dwelling would not have an excessive impact on the neighbouring occupiers.
62. The bedroom would be located at the front of the dwelling. There would be an insulated cavity wall added to these bedrooms and use of double glazing would mitigate noise from the front to some degree. It is also noted that some of the car parking spaces within the rear of the site would be removed and replaced by the rear garden of the new dwellinghouse.
63. In addition, the existing communal bin store, is separated from the front garden behind the front boundary wall, this would further mitigate noise and odour harm caused from these existing bins in proximity to the front bedroom. The size of the existing bin store area would accommodate 5 x 1100l bins within an existing area of hardstanding.
64. There would be some noise impact to the garden area to the rear, however given its significant open and spacious feel, it is still considered that the quality and usability of this space would not be significantly adversely affected by its close proximity to this parking area.
65. It is therefore considered that there would be no significant adverse impact to future occupiers in terms of noise and disturbance.

### *Water Consumption*

66. For residential development, a Water Efficiency Assessment will be required providing evidence the development will meet the target of 105 litres or less per head per day, excluding an allowance of 5 litres of less per head per day for external water use. A condition will be added to secure these details in accordance with policy BSUI1 of the Local Plan.

### *Summary*

67. Overall, the quality of the accommodation is considered acceptable.

### **Transport considerations**

68. Thanet Lodge faces onto both Mowbray Road and Mapesbury Road. The garage block is accessed from Mowbray Road and access to the new dwellinghouse will also be from Mowbray Road. Both Mapesbury Road and Mowbray Road are located within Controlled Parking Zone MA with restrictions from 10am to 3pm Monday to Fridays. As noted above the site lies within PTAL 4.
69. Maximum car parking allowances for Brent are set out in Appendix 4 of the Local Plan and for residential use, this requires compliance with the standards in Table 10.3 of the London Plan. As the site has good access to public transport services and is located in the well-connected southern part of the Borough, up to 0.5 spaces are allowed for dwelling.
70. Up to 21.5 off-street spaces would therefore be allowed for the 43 existing flats and the existing provision of around 15 spaces in Thanet Lodge is within the maximum parking allowance.
71. The proposal would result in the loss of the area of hardstanding to the rear of the garages and shipping container that is informally used for parking. The hardstanding area located to the west of the application site within the wider boundary of Thanet Lodge were initially proposed to remain and continued to be used for parking for around 6 spaces. However, officers in transportation raised concerns with the insufficient aisle width between the dwellinghouse and the spaces that would result in them not all being useable in practice.
72. Amended plans were received to show that the retained car park would be expanded and re-configured which would result in the re-provision of four spaces, with three of the parking spaces moved slightly further south from their existing spots while the fourth parking space would remain on the existing car

park footprint but angled at 90 degrees to the other parking spaces. A tracking diagram has been shown to demonstrate that the cars can reasonably enter and egress from the site with sufficient space.

73. Policy BT2 requires that any overspill parking that is generated can be safely accommodated on-street. In this case, neither Mapesbury Road nor Mowbray Road is noted as being heavily parked at night and between them they could accommodate a further 16 cars along the site frontages, taking the total parking availability (including both on-street and proposed off-street) to be about 20 spaces.
74. Data from the 2021 Census for flats in the area suggests that car ownership averages just 0.47 cars/household (equivalent to 20 cars for these 43 dwellings). As such, it is considered that the parking provision within the site can be reduced as proposed without being likely to result in parking issues in the area.
75. The London Plan requires the provision of at least two secure bicycle parking spaces for the house. A bicycle store is shown to the front of the dwelling to meet this requirement.
76. An existing shared refuse store will also need to be relocated to accommodate this new house. It is now shown at the front of the site, which in terms of collection is an improvement as it minimises carrying distances for the waste contractor.
77. Finally, the width of the driveway through to the remaining parking court will be reduced from 3.5m to 2.7m by this proposal. For the number of spaces still served, it should really be wide enough for two cars to pass one another (i.e. 4.1m plus margins), but the retention of a single-width access (albeit narrower than existing) does not worsen matters, particularly as the number of spaces served is being reduced through the removal of the garages.
78. A separate footway for pedestrians to the new house would also be proposed with a raised kerb between the remaining access road and pedestrian pathway to the new dwelling.

### **Trees and landscaping**

79. The site falls within the Brondesbury Conservation Area. There are trees protected by a TPO at Thanet Lodge however this is limited to trees on the frontage with Mapesbury Road and Mowbray Road. There are some trees within the vicinity of the proposed development with some small trees to the front of the development and some significant trees to the rear/western side of the car park. Some of the existing car parking spaces are within the root protection areas of the protected trees at the rear of the site.
80. Following amendments and discussions with the councils' trees officer, a revised proposed site plan has been provided along with a detailed drawing of the proposed tree protection measures which include minor excavation works to propose a Cellweb tree root protection system below the parking spaces. The number of car parking spaces have been reduced to 4. Three of the parking spaces would be moved slightly further south from their existing spots while the fourth parking space would remain on the existing car park footprint but angled at 90 degrees to the other parking spaces, and would also be positioned within footprint of existing spaces 5 and 6. This would avoid the most significant damage to the root protection areas of the existing rear trees. It has been noted there would be a degree of harm to the smaller rear tree closest to the Thanet Lodge building, which could lead to its decline in the future. To offset this impact 2 new trees could be planted within the wider grounds of Thanet Lodge and this requirement can be secured with a recommended condition ensuring the planting is carried out prior to occupation of the proposed dwelling. This would ensure that the impact on the tree adjacent to the parking area is sufficiently offset. The proposal would accord with policy BG12 that seeks suitable replacement tree planting where trees are proposed to be removed.
81. The increase in hardstanding to accommodate the amended car park area would result in the loss of around 12sqm of the communal garden for the existing flats. The existing communal garden is around 1500sqm so the loss of 12sqm would amount to less than 1% reduction. This is very minor and would be considered unlikely to adversely impact the usability of the communal garden for existing residents.
82. Supporting information has been provided to demonstrate that the scheme would achieve an urban greening factor score that would achieve a score of 0.39, falling slightly short of the 0.4 score as required

under policy BH4 of the Local Plan or that the scheme would achieve a net gain in biodiversity as set out within policy BG11. However, there would be a to increase in soft landscaping with the introduction of the large lawn space at the rear of the site as well as a smaller Laurel hedge to the front. Given the limited soft landscaping on site as existing and given the significant site constraints, the proposed soft landscaping improvements are considered to result in a significant improvement in comparison to the existing situation. The implementation of a landscaping plan would ensure that this improvement in the greening of the site is achieved.

### **Biodiversity Net Gain and Ecology**

83. Biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990.
84. 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 on site habitat. This increase can be achieved through on site biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits.
85. The applicant has declared that the proposal will be a self-build development and so would be exempt from meeting the 10% BNG target. As set out above, the proposal has the potential to effect a tree as a result of the extended hard surfacing for the car park. The loss of this tree in isolation would result in the loss more than 25sqm of habitat. It is therefore recommended that an appropriate mechanism is secured so hat in the event that the development is not carried out as a self build development, measures are in place to the mandatory 10% increase in BNG through off site habitat units in the event that the tree is removed or damaged. This would be secured through a Section 106 Agreement.
86. Policy BG11 (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 council’s ecologist has reviewed the proposal and raises no concerns about the potential for the building/garage to support roosting bats. This is due to its low height and modern construction. The proposal would provide additional landscaping on a site that does not predominantly currently contain any habitats, including the provision of hedges and amenity grass, and would therefore meet the policy requirement to provide a net gain in biodiversity.

### **Flood risk and drainage**

87. Policy BSUI4 of the Local plan states that 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.
88. The site is in flood zone 1 with a low risk of flooding and the site is not in a critical drainage area. There would be no increase to the amount of hardstanding and so, the increase in surface water drainage would be very minor. In addition, the development would involve improvements in soft landscaping. Therefore, although a drainage strategy has not been provided, the impact on surface water drainage would be very minor and the proposed landscaping would provide good opportunities to assist surface water attenuation.

### **Fire safety**

89. London Plan policy D12 indicates that the fire safety of developments should be considered from the outset. This includes measures to demonstrate space identified for the appropriate positioning of fire appliances, appropriate evacuation assembly points and floor layouts and cores planned around issues of fire safety for all building users.
90. The policy states 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
91. The proposal has provided a fire safety statement which addresses the above matters in compliance with policy D12 (a). Detailed fire safety matters will be addressed by building control regulations.

### **Equalities**

92. 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**

93. The proposal would result in the creation of a good quality residential unit, making use of a small infill site, and would result in an enhancement to the visual amenity of the site and wider Brondesbury Conservation area. It would provide a good quality of accommodation to future occupiers and limited harm to neighbouring amenities as well as to the surrounding built environment. The proposal would not result in an adverse impact to the local highways network. The proposal is considered to accord with the development plan when read as a whole and it is recommended that planning permission is granted.



Application No: **25/1022**

To: Mr Burroughs  
93  
Hampton Road  
Hampton Hill  
TW12 1JQ

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

Demolition of garage block and erection of a new dwellinghouse with associated amenity space, provision for new pedestrian access and cycle and refuse storage and creation of additional hardstanding to allow reconfiguration of the parking layout (amended description)

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

at **Thanet Lodge Garages, Mapesbury Road, London**

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: 24/06/2026

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 Local Plan 2019-2041  
The National Planning Policy Framework 2024

- 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:

Drawings

Location Plan

119/AP01-REV B- Proposed Block Plan  
119/AP02- REV B- Proposed Site & Roof Plan  
119/AP03-REV C- Proposed Street View  
119/AP04-REV C- Proposed Front Elevation  
119/AP05-REV C- Proposed Side Elevation  
119/AP06-REV C- Proposed Rear Elevation  
119/AP07-REV B- Proposed Side Elevation  
119/AP08-REV C- Proposed Section AA  
119/AP09- REV A- Proposed Floor Plans  
119/AP11-REV A- Fire Strategy Plan  
119/SK07- REV A- Existing Rear Elevation  
119/S01- Existing Block Plan  
119/S02- Existing Site & Roof Plan  
119/S03- Existing Street View  
119/S04- Existing Front Elevation  
119/S05- Existing Side Elevation  
119/S06- Existing Rear Elevation  
119/S07- Existing Side Elevation  
119/S08- Existing Section AA

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

- 3 All side windows 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: To minimise interference with the privacy of the adjoining occupiers.

- 4 The development hereby approved 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.

5 The dwellinghouse hereby approved shall be designed to achieve M4(2) requirements.

Reason: To comply with the requirements of policy D7 of London Plan 2021.

6 The dwellinghouse hereby approved shall not be occupied unless the cycle storage and refuse store have been completed, in full accordance with the approved drawings and the facilities shall thereafter be made available to residents of the dwellinghouse and shall not be used other than for purposes ancillary to the dwellinghouse hereby approved.

Reason: To ensure a satisfactory standard of accommodation.

7 The dwellinghouse hereby approved shall not be occupied unless details have been submitted to and approved in writing by the Local Planning Authority for two replacement trees to be planted within the grounds of Thanet Lodge in accordance with the agreed approved details. If the replacement trees become severely damaged or to be diseased within five years of planting they shall be replaced. Replacement planting shall be in accordance with the approved details (unless the Local Planning authority gives its written consent to any variation).

Reason: To replace the loss of trees currently occupying the site.

8 The dwellinghouse hereby approved shall not be occupied unless the extended car park area has been completed, in full accordance with the approved drawings.

Reason: To ensure a satisfactory car park layout.

9 Prior to the commencement of the development (excluding any demolition, site clearance and the laying of foundations), details of materials for all external work, including samples which shall be made available for viewing on site or in an agreed location, shall be submitted to and approved in writing by the Local Planning Authority. This shall include a sample panel of brickwork measuring not less than 1m x 1m shall be constructed to show the brickwork, brickwork bonding and pointing type as well as the plinth.

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

Reason: To ensure a satisfactory development which preserves the character and appearance of the conservation area and does not prejudice the amenity of the locality.

10 Prior to first occupation of any part of the development hereby approved, a hard and soft landscaping scheme shall be submitted to and approved in writing by the Local Planning Authority. Such details shall include:

- I. A scaled plan showing vegetation to be planted including the use of native and/or wildlife attracting species
- II. Details of all proposed hardstanding
- III. Details of garden wall, fences or other form of boundary treatment to be provided within the site (including details of external materials and heights)
- IV. Details to maximise the urban green factor (UGF) for the site in line with policy BH4 of Brent's Local Plan 2019-2041
- V. Details of any external lighting including measures to minimise overspill lighting to windows of neighbouring properties
- VI. Details of a secure and covered bicycle store for 2 bikes
- VII. Details of bin store facilities with a capacity of 1 x 240l bin for dry recycling, 1 x 140l bin for residual waste and 1 x 23l kerbside container for food waste in line with the Waste and Recycling Storage and Collection Guidance for Residential Properties.

The hard and soft landscape works shall be carried out in full accordance with the approved details prior to the use of the dwellinghouse hereby approved, unless alternative timescales have been submitted to and approved to be agreed in writing by the Local Planning Authority and the works shall thereafter be carried out in accordance with the approved timescales.

Any new planting which dies, is removed, becomes severely damaged or diseased within five years of planting shall be replaced. Replacement planting shall be in accordance with the approved details (unless the Local Planning authority gives its written consent to any variation).

Reason: To safeguard and enhance the character and amenity of the area, to provide ecological, environmental and biodiversity benefits and to maximise the quality and usability of open spaces within the development, and to enhance its setting within the immediate locality in accordance with policies DMP1 and BGI2 of Brent's Local Plan (2019-2041).

## 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 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>

**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** - 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).

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