



Planning Committee

Wednesday 5 August 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 of a person from whom you have received gifts or hospitality of at least £50 as a member in the municipal year;

or

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

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

Agenda

Introductions, if appropriate.

ITEM	WARD	PAGE
1. Apologies for Absence		
2. Declarations of interests Members are invited to declare at this stage of the meeting, the nature and existence of any relevant disclosable pecuniary or personal interests in the items on this agenda and to specify the item(s) to which they relate.		
3. Minutes of the previous meeting To approve and confirm the minutes of the previous meeting held on Thursday 2 July 2026 as a correct record.		1 - 42
APPLICATIONS FOR DECISION		
4. 26/0225 - Brent NHS Primary Care Trust, Wembley Centre For Health & Care, 116 Chaplin Road, Wembley, HA0 4UZ		47 - 126
5. Any Other Urgent Business Notice of items to be raised under this heading must be given in writing to the Deputy Director of Democratic and Corporate Governance or their representative before the meeting in accordance with Standing Order 60.		
Date of the next meeting: Tuesday 8 September 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 Thursday 2 July 2026 at 6.00pm

PRESENT: Councillor S Butt (Chair), Councillor HB Patel (Vice-Chair) and Councillors Gallagher, Ibrahim, Mahmood, Maurice, Georgiou and I Ahmed

1. Welcome and Apologies for absence

Apologies for absence were received from Councillor Thomas with Councillor Iftekhar Ahmed substituting.

Apologies for absence were also received from Councillor Lorber, who had registered to speak as an objector in relation to the first application. Councillor Georgiou, therefore attended as his substitute for the duration of the meeting.

2. Declarations of interests

In relation to Agenda Item 4: 26/0225 - Brent NHS Primary Care Trust, Wembley Centre for Health & Care, 116 Chaplin Road, Wembley, HA0 4UZ, and Item 5: 25/0810 - Kingsbury High School, Princes Avenue, London, NW9 9JR, the Chair had confirmed all members of the Committee had received approaches from objectors (comprising 1 approach in relation to Agenda Item 4 and 4 approaches in relation to Agenda Item 5) but had not engaged in discussion or sought to take any position on the application and therefore felt able to consider the applications impartially and without any form of predetermination.

No other declarations of interest were made during the meeting.

3. Minutes of the previous meeting

RESOLVED that the minutes of the previous meeting held on Wednesday 3 June 2026 be approved as a correct record of the meeting.

4. 26/0225 - 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.

RECOMMENDATION

That the Committee resolve to GRANT planning permission subject to:

- (1) The prior completion of a satisfactory legal agreement; and
- (2) The conditions and informatives, as set out in the committee report.

Gary Murphy (Principal Planning Officer) introduced the report, advising members that the application sought full planning permission for the demolition of the existing Old Wembley Hospital buildings on the site, along with the former Ambulance Station and to 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

Attention was also drawn to the supplementary report circulated in advance of the meeting, which noted the receipt of a further representation from Councillor Lorber, together with the officers' responses. The recommendation remained to grant planning permission, subject to the conditions and informatives set out within the main committee report, together with the prior completion of a satisfactory s106 legal agreement.

The Chair thanked Gary Murphy 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 Sylwester Zabielski (who had registered to speak as an objector) to address the Committee in relation to the application, who highlighted the following points:

- Sylwester Zabielski began by stating that he and his partner had purchased their property at 15 Fairview Avenue approximately 6 years ago, having regarded it as their long-term forever home.
- The property was described as a 2 storey red brick bungalow situated at the end of Fairview Avenue and adjoining the rear of the former Old Wembley Hospital site. It was stated that the property's features included its natural light, convenient location, relative tranquility, and the privacy afforded to both the dwelling and its garden.
- The speaker objected to the proposed development of the semi-detached houses that were designed to replace the parking lot at the back of the Old Wembley Hospital, specifically the construction of 4 dwellings which, in his view, would result in irreversible harm to the levels of daylight, sunlight and privacy currently enjoyed.

- The objector stated that both their dwelling and a garden outbuilding would be adversely affected by the proposed development and raised 3 principal concerns:
- 1) Firstly, Sylwester Zabielski described the kitchen as the heart of his home, being used for dining, entertaining guests and daily living activities. It was stated that the room currently benefited from good levels of afternoon sunlight. Concern was expressed that the erection of buildings measuring approximately 9.45 meters in height and positioned around 9 meters from the boundary fence would significantly reduce the amount of natural light available to the property. It was felt that this separation distance was substantially less than the 18 meters he understood to be required.
 - 2) Secondly, Sylwester Zabielski raised concerns regarding overlooking and loss of privacy. It was highlighted that the proposed dwellings incorporated windows facing towards their kitchen and expressed concern that this would result in an unacceptable loss of privacy for the household if the plans were not altered to the same rules he was required to follow while working on his garden house.
 - 3) Thirdly, Sylwester Zabielski referred to the anticipated construction period, which he estimated would last approximately 2 years. Concerns were expressed regarding the impact of the development process, including potential disturbance from demolition and construction works, dust, noise, and water related activities associated with the site.
- In concluding his presentation to the Committee, Sylwester Zabielski recognised that change and progress were inevitable. However, he expressed the view that all development proposals should be subject to the same rules and standards. Sylwester Zabielski urged the Committee to reconsider the proposal, to review a document submitted by his partner seeking amendments to the scheme, and to support changes that would mitigate the impact on their home.

The Chair thanked Sylwester Zabielski 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:

- As an initial query, members questioned the distance between the proposed development and Sylwester Zabielski's property. In response, Sylwester Zabielski advised that the distance between the kitchen window and the boundary fence was approximately 1 meter. It was further stated that the proposed dwelling would be situated approximately 9 meters from the boundary fence.
- In referring to the concerns raised regarding overlooking, as well as the potential impacts arising from construction activities, including noise and dust, the Chair queried whether the objector's concerns would be addressed if mitigation measures were secured through planning conditions, including the relocation of windows or the installation of obscure glazing to prevent overlooking. In response, Sylwester Zabielski stated that such measures would

only partially address the concerns raised. It was expressed that the principal concerns related to the loss of daylight and sunlight to the property, which were considered to be significant. It was further mentioned that the kitchen had been described within the application process as a non-habitable room, a characterisation with which Sylwester Zabielski disagreed. Sylwester Zabielski advised that the kitchen was fully habitable and formed a central part of daily life, being used extensively. It was emphasised that the room was regarded as the heart of the home and that any reduction in natural light would therefore have a substantial impact on their enjoyment.

- Members were keen to seek details regarding the source of the statement that the kitchen was considered uninhabitable. In response, Sylwester Zabielski advised that the comment had been contained within documents published on the Council's website as part of the planning application process, through which stakeholders were able to submit representations in response to the application. Sylwester Zabielski confirmed that he was unable to identify the specific individual who had made the comment and did not know whether it had been made by a Brent officer or another respondent.

The Chair thanked Sylwester Zabielski for responding to the Committee's questions and then moved on to consider an additional request to speak which had been received from Councillor Lorber (who had registered to speak as an objector), who highlighted the following points:

- Councillor Lorber, who had presented a petition opposing the proposed development on behalf of local residents, began by stating that the site had formerly been located within his ward when he was first elected as a Councillor and was therefore very familiar with the area and its surrounding characteristics. It was explained that his objections reflected the concerns of local residents and were based on what he considered to be substantial overdevelopment of the site, including concerns regarding the overall height of the proposed buildings.
- Councillor Lorber further expressed concern regarding the level of affordable housing proposed within the scheme. It was stated that Brent required additional affordable housing provision and considered that the development failed to deliver an adequate number of affordable homes.
- Further objections were raised in relation to the proposed absence of on-site car parking provision for the 99 residential units. Councillor Lorber urged the Committee to consider the position of nearby developments, including Lowry Lodge and Turner Close, which he described as sustainable developments constructed approximately 15 to 20 years ago. Councillor Lorber advised that Lowry Lodge comprised 22 flats served by 22 car parking spaces, whilst Turner Close comprised 5 houses with 9 car parking spaces and 21 flats with 25 car parking spaces. In addition, it was noted that 10 car parking spaces were available on the surrounding road network through the Controlled Parking Zone (CPZ) arrangements.

- It was stated that the provision of sufficient parking within the area was important due to the site's proximity to Wembley and its surrounding facilities, including a police station, fire station, hospital facilities and a local school. It was felt that a failure to provide adequate parking on-site would inevitably increase parking pressures within neighbouring residential streets.
- Reference was made to the Council's policy approach of restricting the provision of parking spaces within new developments and refusing parking permits to future occupiers. Councillor Lorber stated that, in his view, evidence had not been provided to demonstrate that the policy operated effectively in practice. He contended that the system was capable of being circumvented and expressed the view that some residents would continue to own vehicles and park within surrounding residential streets, resulting in inconvenience and disruption to existing residents.
- In referring to pages 35 and 36 of the committee report, Councillor Lorber noted that these contained references to national, London Plan, and Brent Council policies relating to the creation of strong and inclusive communities. It was felt that the proposed development would not achieve those objectives. Instead, concern was expressed that the development, which he stated would create a community of 108 homes, could lead to conflict between new and existing residents as a consequence of parking demand generated by occupiers and their visitors.
- In concluding his presentation to the Committee, Councillor Lorber emphasised that the proposal represented an unsustainable form of development that would give rise to avoidable conflict within the local community. It was further stated that the application site constituted public land and therefore presented an opportunity to deliver a greater level of affordable housing. In his view, the proposed development had failed to make adequate provision in this regard and therefore represented a missed opportunity to address local housing needs.

The Chair thanked Councillor Lorber 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 sought further details regarding the raised in relation to parking provision and other associated issues in the near area to the proposed site. In response, Councillor Lorber advised that most of the surrounding area was located within a CPZ. It was stated that Chaplin Road was an extremely busy route and that, during works undertaken by the water company on Harrow Road, a significant proportion of traffic had been diverted through Chaplin Road, resulting in increased congestion. Councillor Lorber further advised that Chaplin Road served as an access route to the local primary school and was therefore already subject to substantial levels of parking demand and vehicular traffic. It was reported that local residents had expressed concern that a development comprising more than 100 residential units, with very limited parking provision, would result in displaced parking being accommodated within surrounding residential streets. Reference was made to

the Council's ongoing consultation regarding a Safe School Scheme for Barham Primary School. It was explained that the proposals would restrict vehicle access and parking within Danethorpe Road, Bassingham Road and neighbouring streets adjacent to the school. It was highlighted that Chaplin Road had not been included within the proposed restrictions and the view was expressed that motorists who would no longer be able to access or park within the surrounding streets would instead seek to use Chaplin Road, thereby placing additional pressure upon the area. It was considered that this was a factor which had not been taken into account within the planning application. In support of his concerns, Councillor Lorber referred to Lowry Lodge and Turner Close, which he regarded as examples of successful and sustainable development. The Committee were informed that he had visited the area at approximately 3pm on the day of the meeting in order to assess parking usage and observed that approximately 50% of the available parking spaces were occupied. He considered this demonstrated that parking provision remained necessary even during daytime periods when many residents were likely to be away from home. Councillor Lorber stated that, in his opinion, the proposal did not constitute sustainable development and expressed that the application formed part of a wider pattern of similar developments and that the cumulative impact of such schemes was creating conflict and difficulties for existing residents due to insufficient parking provision. He further advised that he had attended a consultation event relating to the proposed development and had specifically enquired as to why additional parking spaces had not been incorporated into the scheme, to which he had been informed by the developers that Brent Council planners had advised against the provision of further parking spaces.

- Further information was also requested regarding the history, purpose and significance of the site, including the reasons for its current form and use. In response, Councillor Lorber provided historical context regarding the site and explained that the original Wembley Hospital had been established prior to the creation of the NHS and noted that a building within the hospital grounds was known as Barham House. Councillor Lorber highlighted that Barham House had been named after Titus Barham and the Barham family. It was stated that the family had donated the land upon which the hospital had been constructed and that Mrs. Barham had played an active role in assisting with its operation. It was further mentioned that the hospital had been funded through contributions from the Barham family together with public subscription and therefore represented an important public asset. Concern was expressed that the proposed development failed to provide appropriate recognition of the contribution made by the Barham family. It was emphasised that heritage assets should not be considered solely in terms of their physical buildings, but also in relation to the individuals whose efforts had delivered important facilities and services for local communities. In this regard, Councillor Lorber highlighted the role played by the Barham family in establishing a much-needed public hospital for the residents of Wembley during the late 1920s and early 1930s. Councillor Lorber stated that the hospital was in the process of being lost and expressed concern that no replacement community facility had been proposed as part of the redevelopment. He considered that the installation of a limited number of information signs would not adequately reflect either the significance of the site

or the contribution made by the Barham family. In reiterating his earlier objections, Councillor Lorber stated that he regarded the proposal as an overdevelopment of the site and expressed the view that insufficient parking had been provided and that the development sought to maximise residential accommodation across the site without delivering any community facilities. It was felt that a development comprising 108 residential units with no community facilities could not reasonably be regarded as contributing towards the creation of strong and inclusive communities. For these reasons, Councillor Lorber urged the Committee either to defer consideration of the application in order to allow the applicant the opportunity to submit an improved scheme, or alternatively to refuse the application on the grounds he had outlined.

The Chair thanked Councillor Lorber for responding to the Committee's questions and then moved on to consider a further request to speak which had been received from Councillor Brown (who had registered to speak as a Ward Councillor), who highlighted the following points:

- Councillor Brown began by stating that, together with Councillor Lorber, he had organised and submitted a petition to ensure that the strong views of local residents were brought before the Committee, given the significant concerns that had been expressed regarding the impact of the scheme on the surrounding area.
- It was noted that the proposals for the former Wembley Hospital site included the provision of more than 100 residential units whilst incorporating very limited parking provision. Concern was expressed that this would result in additional vehicles being accommodated on surrounding residential streets, thereby increasing congestion and creating significant traffic related problems for existing residents, future occupants of the development and their visitors.
- It was further highlighted that the proposed 99 flats would be provided without any parking spaces and stated that, irrespective of the reasons for this approach, he considered the situation to be unacceptable.
- Councillor Brown also raised concerns regarding the level of affordable housing proposed within the scheme. It was noted that just over 10% of the homes would be provided as affordable housing and argued that this fell significantly below the targets set out within Brent's Local Plan. In his view, this level of provision was inadequate for a development of such scale.
- In addition, Councillor Brown expressed concern regarding the absence of any community facilities within the development despite the site replacing a former community asset. He referred to the historical significance of the site, noting that the original hospital had been established through public subscription and the efforts of the Barham family. It was considered that the proposals failed to provide appropriate community infrastructure or adequately recognise the site's heritage value.
- It was further stated that local residents deserved a higher quality scheme than that being proposed. It was felt that a development of this scale should deliver

a meaningful level of affordable housing together with the necessary infrastructure and facilities required to support future residents. Concern was expressed that the proposal would instead increase congestion and place further pressure on local roads and public services.

- In concluding his presentation to the Committee, Councillor Brown expressed that he did not believe the application to be in the best interests of Wembley and urged the Planning Committee to refuse planning permission. He advised that he had spoken with numerous local residents and reported that none had expressed support for the proposal or considered it to be a beneficial development for the area.

The Chair thanked Councillor Brown 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:

- Clarification was sought regarding the concerns expressed by local residents in relation to the proposed development, in addition to the parking issues that had already been raised. In response, Councillor Brown advised that residents of Turner Close had expressed significant concern regarding the scale and height of the proposed buildings, which they believed would dominate and overshadow their existing homes. It was further reported that residents of Chaplin Road had raised concerns regarding traffic congestion within the area. It was stated that the surrounding road network was already heavily congested, particularly during school drop off periods associated with Barham Primary School. It was considered that these issues would be further exacerbated by the proposed school safety scheme affecting Bassingham Road and other routes serving the school. Councillor Brown expressed the view that the development had not been planned in a sensible or sufficiently considered manner. It was highlighted that the proposal comprised more than 100 residential units, including 99 flats that would be provided without any parking spaces. In his opinion, this would inevitably result in increased pressure on surrounding roads, leading to greater congestion and parking difficulties within the local area.
- Members queried whether the parking impacts associated with the development could be mitigated through the introduction of CPZ within the surrounding streets and sought Councillor Brown's views, together with those of local residents, on such an approach. In response, Councillor Brown advised that the surrounding streets were already subject to CPZs. As a result, it was considered that the introduction of additional CPZ would have little or no effect, as the area already operated within a CPZ and there was therefore no scope for further expansion.
- Supplementary queries were raised regarding whether extending the hours of operation of the CPZ could assist in addressing parking pressures associated with the proposed development, to which the Chair clarified that the CPZ operating on Chaplin Road was currently applied between 10am and 3pm.

- Further details were sought regarding the level of affordable housing proposed within the development, noting that it appeared to fall significantly below Local Plan expectations, and requested additional information regarding the implications of this shortfall in the context of housing demand within the borough. In response, Councillor Brown advised that one of the most significant areas of housing demand within Brent related to larger family homes. Concern was expressed that, whilst some of the affordable housing units proposed would provide smaller accommodation, including approximately 3 or 4 one-bedroom properties, the overall provision would not adequately address the borough's identified housing needs. It was noted that only 11 of the 109 residential units would be provided as affordable housing, representing just over 10% of the total scheme. It was stated that this level of provision fell substantially below the affordable housing targets expected by Brent for developments of this nature. The view was expressed that the proposal was a poorly conceived scheme that failed to deliver the type and quantity of housing sought by the borough and did not adequately respond to identified local housing needs.

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

- Phil Clark began by stating, as outlined within the committee report, public facing healthcare services had ceased operating from the site in 2000. It was noted that the buildings had subsequently been declared surplus to requirements in 2019 and had remained vacant and unused since that time.
- The applicant's representative stated that the site constituted a sustainable brownfield location which had been allocated for redevelopment within the Council's Local Plan. It was explained that the proposals had adopted a design led approach intended to unlock and optimise the redevelopment potential of the site.
- Phil Clark advised that the application sought to address one of London's key priorities through the delivery of new homes in an accessible and sustainable location. The scheme would provide 108 high quality residential units, including affordable housing, family homes and wheelchair accessible accommodation. In addition, the proposals included a new publicly accessible pedestrian link connecting Fairview Avenue and Chaplin Road, positioned behind retained mature trees and supported by generous landscaped areas and children's play facilities.
- The Committee was informed that an extensive pre-application engagement process had been undertaken. This had included public exhibitions together with presentations to the Council's Community Review Panel, Design Review Panel and a Members' Briefing. It was noted that the proposals had evolved through ongoing engagement with Brent's Planning, Urban Design and Highways Officers. According to the applicant's representative, this process had resulted in significant improvements to the layout of the scheme, its

architectural appearance and the quality of the landscape and amenity provision.

- The applicant's representative highlighted a number of key benefits arising from the proposals. These included the redevelopment of a previously developed, sustainable and vacant site and a meaningful contribution towards the borough's housing supply, including the delivery of affordable housing. It was further stated that the scheme would improve the pedestrian environment and streetscape along Chaplin Road.
- In addition, the Committee was advised that the development would generate significant investment within the Wembley area through Council Tax receipts together with Section 106 and Strategic Community Infrastructure Levy (SCIL) contributions.
- Phil Clark further stated that the scheme had responded to requests to recognise the site's cultural heritage through the inclusion of information boards within the proposed pedestrian link.
- The applicant's representative additionally advised that the scheme would achieve an 11.7% biodiversity net gain, an Urban Greening Factor of 0.4 and carbon savings of 75% through the incorporation of renewable technology and sustainable construction methods.
- Phil Clark expressed that Fairview New Homes remained committed to exploring opportunities to increase the level of on-site affordable housing through the utilisation of GLA grant funding.
- The applicant's representative further advised that Fairview New Homes did not engage in land banking practices and instead focused on the prompt delivery of developments from acquisition through to construction. It was stated that, subject to the grant of planning permission, construction of the development could commence in Autumn 2026, with the first homes anticipated to be completed in early 2028.
- The applicant's representative additionally advised that the proposals had been prepared with input from a multidisciplinary team of professional consultants. It was noted that the supporting documents submitted with the application had been carefully assessed by Council officers and had been deemed compliant with the requirements of relevant national, regional and local planning policies and guidance.
- In concluding his presentation to the Committee, Phil Clark requested that the Committee support the officers' recommendation and grant planning permission for the proposed development.

The Chair thanked Phil Clark 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 enquired how long the existing building had been vacant, to which Phil Clark advised that the site had been vacant since around 2019. It was explained that the site had only been acquired from the NHS earlier in the year and that, whilst the building had been used periodically during the Covid 19 pandemic for the storage of PPE equipment, it had otherwise remained unused.
- Members then sought clarification regarding the total number of parking spaces proposed for the development, to which Phil Clark confirmed that a total of 12 parking spaces were proposed.
- Following on from the previous question, members queried whether the parking spaces would be allocated. In response, Phil Clark confirmed that 9 parking spaces would be allocated to the family houses, which comprised 9 3-bedroom family homes. It was added that the remaining 3 Blue Badge spaces would be managed through a car park management plan.
- Members were keen to seek details on whether the level of affordable housing provision could be increased. In referring to paragraphs 43 to 59 of the committee report, which detailed the viability discussions undertaken in relation to affordable housing delivery, Phil Clark explained that the maximum reasonable amount identified through viability testing had been 10 affordable units. However, this provision had subsequently been increased to 11 units, including a 3 bedroom dwelling. It was noted that this exceeded the level supported by the viability assessment. It was mentioned that Fairview New Homes had an experienced in-house Affordable Housing Team and that, should a Registered Provider (RP) be secured and grant funding obtained, opportunities to increase the provision further would be explored. However, it was stated that the current position reflected the viability of the scheme at that point in time.
- Requests for information were raised regarding the number of jobs expected to be generated during construction. In response, Phil Clark advised that the section 106 agreement sought to achieve approximately 11 local employment opportunities, based upon a formula contained within Brent's Supplementary Planning Document (SPD). It was noted that construction works would be subcontracted, but that approximately 11 local employment opportunities were anticipated.
- Referring to apprenticeship opportunities linked to Brent Works, members sought further clarification regarding the offer. In response, Phil Clark confirmed that apprenticeships formed part of the proposed section 106 Heads of Terms. It was further stated that the requirement was based on 1 apprenticeship for every 10 units delivered.
- Members enquired how long the proposed development would take to complete, to which Phil Clark advised that the anticipated construction duration was approximately 18 months.

- Further information was requested regarding the public consultation process, including the number of residents who had participated and the overall response received from the local community. In response, Phil Clark advised that 2 public exhibitions had been undertaken. It was explained that approximately 2,300 properties and businesses had received consultation material in advance of the exhibitions. It was noted that a second exhibition had been arranged following an issue identified during the first consultation exercise. Attendance had been higher at the first exhibition, with approximately 35 to 40 attendees, whilst the second exhibition had attracted approximately 20 to 25 attendees. It was stated that a mixture of support and concerns had been expressed and that the issues raised had been discussed with officers throughout the application process.
- Following up, members questioned what the principal concerns raised by residents had been during consultation. In response, Phil Clark advised that, at the time of consultation, the scheme had proposed a consistent 6 storey form across the site and that concerns had related primarily to the height and massing of the development. Parking provision had also been raised as an issue. It was noted that affordable housing had not formed part of those discussions as a position had not yet been established at that stage. It was explained that the design had subsequently evolved, with greater articulation and stepping in height. The scheme now stepped from 3 storeys on the eastern edge to respect the existing residential context, rising through 4 and 5 storeys, with 6 storeys limited to the north western corner where it related more appropriately to neighbouring civic buildings and larger scale development.
- With reference to residents' concerns regarding parking provision, members queried why the level of on-site parking was so limited. In response, Phil Clark explained that GLA policy, alongside planning policies within Brent and other London boroughs, promoted a move away from vehicle use in sustainable locations. It was highlighted that the site was classified as PTAL 4, benefitting from bus services on Chaplin Road and relatively equal proximity to Sudbury and Wembley Central railway stations. As a result, the site was considered sustainable and planning policy supported reduced levels of parking provision.
- Members then questioned whether discussions had taken place with planning officers regarding the possibility of increasing parking provision. In response, Phil Clark advised that Fairview's experience demonstrated that developments subject to car free restrictions often experienced a cultural shift in travel behaviour. It was stated that extensive discussions had taken place with the local authority regarding parking provision and that a negotiated position had ultimately been reached, which was reflected in the current proposal.
- Considering active travel policies, members enquired whether the consultation had identified factors discouraging active travel in the area and why residents felt that public transport options insufficient. In response, Phil Clark explained that the principal concern raised by residents had been the lack of parking provision. It was further noted that discussions had therefore largely focused on parking. It was added that the proposed Section 106 agreement included an active travel contribution and that a travel plan would also be secured.

- Members observed that the scheme did not fully achieve the Local Plan Policy BH6 target for 3 bedroom homes and asked why that target had not been met. In response, Phil Clark explained that the scheme delivered approximately 24% 3 bedroom accommodation against a target of 25%. It was further mentioned that achieving the appropriate balance of unit sizes within the development, whilst maintaining efficient building layouts, had resulted in the final mix proposed. It was noted that the scheme comprised approximately 26% one bedroom units, 50% 2 bedroom units and 26% 3 bedroom units, including 9 semi-detached and terraced 3 bedroom houses.
- The Committee questioned the rationale for allocating parking spaces to all family houses whilst providing no general parking for apartment residents beyond Blue Badge spaces. In response, Phil Clark confirmed that the 3 Blue Badge spaces were intended for apartment residents. It was explained that the allocation of the remaining 9 spaces to the family houses had emerged through the design and negotiation process and was considered the most appropriate arrangement. It was noted that 3 terraced houses had direct access from Chaplin Road with parking spaces immediately in front of them, making allocation logical, whilst the remaining house spaces had also been considered the most suitable use of the available parking provision.
- Members noted the provision of children's play space but expressed concern regarding facilities for older children and teenagers. Members questioned whether a dedicated indoor youth space could be incorporated within the development. In response, Phil Clark advised that the scheme met all on-site play space requirements for children up to the age of 11 years. It was noted that there was a shortfall of approximately 100 sqm² in provision for children aged 12 years and over, and that a financial contribution had therefore been secured through the Section 106 agreement to provide facilities at Barham Park. It was stated that a dedicated indoor youth space had not formed part of the development brief and added that, without an on-site management presence, ongoing management and supervision of such a facility would present challenges.
- Details were sought regarding discussions with Registered Providers concerning affordable and potentially social rented housing. In response, Phil Clark advised that there was no provision of social rent housing on the development and that providing social rent on the development would result in fewer affordable units than could currently be achieved through London affordable rent.
- Questions were raised regarding daylight impacts, the 45-degree rule and separation distances, with reference to the concerns highlighted by one of the previous speakers. In response, Phil Clark advised that the proposed development would be located approximately 9.7 meters from the rear elevation to the boundary fence and approximately 10.7 meters from the affected window. It was highlighted that the window at No.15 was a flank window rather than a rear facing window. Phil Clark additionally stated that, whilst he was not

suggesting there would be no impact, the proposed design represented the least harmful option available.

- Members noted that the application had originally proposed 4 affordable housing units, which had subsequently increased to 7, then 10, and finally 11 units, and questioned whether there had been a genuine intention to maximise affordable housing provision. In response, Phil Clark explained that the applicant had initially identified 4 affordable units as representing the maximum level supported by its viability assessment. It was noted that this position had been independently tested and challenged by the Council's viability consultant, including scrutiny of values, costs and interest percentages. As a consequence of those discussions, the affordable housing provision had increased to 10 units, with a further negotiation resulting in the inclusion of an 11th affordable unit.
- The Chair referred to concerns regarding overlooking from windows and questioned whether obscure glazing could be secured by condition. Assurances were also sought regarding the implementation of measures to mitigate construction dust and noise. In response, Phil Clark advised that the development had been designed in accordance with recognised good design principles and maintained a separation distance of approximately 9 meters from the site boundary. It was stated that the windows in question served bedrooms located on the second and third floors and that obscure glazing was therefore unlikely to be appropriate, as it would adversely affect residential amenity for future occupants. It was further explained that the scheme complied with the applicable separation distance standards contained within the Council's Supplementary Planning Document (SPD). In relation to construction impacts, it was highlighted that a detailed Construction Management Plan had been prepared in consultation with officers, specifically addressing the relationship with No.15 Fairview Avenue. The Plan included measures relating to dust control, noise management and the positioning of site facilities. It was confirmed that compliance with the approved Construction Management Plan would be secured by condition.
- The Chair referred to the possibility of a commemorative plaque and sought clarification regarding discussions that had taken place. In response, Phil Clark noted that the matter had been raised at both the Member briefing during the pre-application stage and by local residents during public consultation. It was confirmed that a planning condition required details of the commemorative arrangements to be submitted to and approved by officers prior to installation. It was further mentioned that the specific content, historical references and number of plaques had not yet been determined, but that the matter was secured through a planning condition.

The Chair thanked Phil Clark 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:

- As an initial query, members sought clarification regarding the Council's target within the Local Plan for the delivery of affordable housing on new developments. In response, Victoria McDonagh (Development Management Service Manager) advised that both the London Plan and Brent's Local Plan contained a strategic target for 50% of new homes to be delivered as genuinely affordable housing. It was explained that this target was intended to apply across the plan period and not on an application-by-application basis. It was noted that, when the London Plan was adopted, it had been recognised that not all schemes would be capable of achieving the 50% target due to factors including viability considerations. As a result, the threshold or fast track approach had been introduced. Members were also informed that schemes delivering 35% affordable housing with the appropriate tenure split of 70% low cost rent and 30% intermediate housing would not be required to submit a financial viability assessment and could proceed via the fast track route, subject to an early stage review should substantial works not commence within 24 months of planning permission being granted. Members were further advised that developments on public sector land were subject to a 50% affordable housing threshold and, where this was achieved alongside the required 70% and 30% tenure split, no viability assessment would be required. Where the threshold was not met, applicants were required to submit a financial viability assessment demonstrating that the development would provide the maximum viable level of affordable housing. It was confirmed that Brent's Local Plan mirrored this approach and that the scheme under consideration had been viability tested and demonstrated to provide the maximum viable level of affordable housing. As a result, the proposal was considered to accord with the relevant London Plan and Local Plan policies.

Colin Leadbeatter (Development Management Area Manager) added that the application had not met the threshold for the fast-track approach and had therefore been subject to a full assessment of the applicant's submitted Financial Viability Assessment (FVA) both internally by specialist Council officers and externally by independent consultants acting on behalf of the Council. It was explained that the original Financial Viability Assessment, submitted in November 2025, proposed 4 affordable housing units as the maximum viable provision and identified a deficit of £508,485. Following an independent review by BNP Paribas, the Council concluded that the scheme would generate a surplus and could therefore support a greater level of affordable housing provision. A revised Financial Viability Assessment was subsequently submitted in January 2026, increasing the affordable housing offer to 7 units. Following further independent assessment, officers concluded that the scheme would still generate a surplus and could therefore accommodate additional affordable housing provision. Following further testing and review, it had been concluded that the provision of 11 affordable housing units would result in a deficit of approximately £191,000. However, the applicant had agreed to provide the 11 units as a without prejudice offer, meaning that the affordable housing provision proposed exceeded the level identified by the viability assessment as deliverable.

David Glover (Head of Planning and Development Services) further advised that the Council's consultants had confirmed that the proposal represented the

maximum amount of affordable housing that could viably be delivered on the site. It was noted that current policy permitted either Social Rent or London Affordable Rent and that the affordable housing proposed fully complied with the relevant London Plan and Local Plan policies. Members were further reminded that every proposal involved both benefits and harms and that the role of the Committee as decision maker was to weigh those considerations in determining whether planning permission should be granted.

Colin Leadbeatter (Development Management Area Manager) additionally noted that the draft Heads of Terms for the Section 106 Agreement included provision whereby, should grant funding subsequently become available through a Registered Provider (RP) and the GLA, the affordable homes could be converted to social rent tenure.

- Concerns were expressed that developers appeared able to rely upon viability arguments to avoid meeting the Council's 50% affordable housing target and members questioned the value of maintaining such a target if it was not achieved in practice. In response, Victoria McDonagh (Development Management Service Manager) acknowledged that since the Local Plan had been drafted around 2019/20 and subsequently adopted in 2020/21, economic conditions had become significantly more challenging. It was highlighted that there were substantial increases in construction costs, interest rates and other financial factors, all of which were assessed through the viability process. It was explained that viability assessments involved professional estimates which were rigorously tested and challenged by the Council's consultants and officers. It was noted that, in some cases, RPs had subsequently acquired blocks of affordable housing, resulting in a greater level of affordable housing delivery than was originally identified through viability assessments. However, officers were required to assess applications in accordance with adopted planning policies and the robustly tested viability evidence available at the time of determination. The Committee were further advised that development involved risks for developers and that if viability risks were considered excessive, schemes might not come forward at all, resulting in reduced housing delivery. It was added that there remained significant demand for both housing and affordable housing within the borough and that bringing forward developments had become increasingly challenging.

David Glover (Head of Planning and Development Services) further stated that, when the Local Plan was reviewed, consideration would be given to the level of affordable housing likely to be realistically achievable in future market conditions. It was also noted that Brent had historically been one of the highest performing London boroughs in terms of housing and affordable housing delivery, although delivery levels had declined over the previous 2 to 3 years due to financial conditions. It was highlighted that housebuilding had fallen across Brent, London and nationally. It was reiterated that the strategic 50% affordable housing target was not intended to be applied on an application-by-application basis and therefore could not be treated as a material consideration in the assessment of the current proposal.

- Views were then sought regarding whether it was felt the proposed provision of 11 wheelchair user dwellings alongside only 3 Blue Badge parking spaces was adequate. Details were also in relation to accessibility and public transport connections. In response, John Fletcher (Team Leader - Development Control, Transport Planning) advised that policy required a minimum of 3% of units to be provided with disabled parking spaces, which had resulted in the provision of 3 designated disabled bays. It was noted that not all disabled residents necessarily owned vehicles. It was explained that a Car Park Management Plan would be secured to govern the allocation and monitoring of parking spaces, including arrangements to respond should demand exceed supply. In relation to accessibility, it was stated that the site had a Public Transport Accessibility Level (P-TAL) rating of 4, representing good accessibility. The development was located within standard walking distance of Wembley Central Station, which provided lift and stair lift access to all platforms, and was also served by 10 bus routes within the immediate vicinity. It was considered that the site's parking space provision supported the proposed car free approach.
- In referring to the Mayor of London's target for 80% of trips to be made by walking, cycling or public transport by 2041, members queried whether the development would contribute towards active travel enhancements in the area. In response, John Fletcher (Team Leader - Development Control, Transport Planning) advised that the Transport Assessment predicted only 11% of trips generated by the development would be undertaken by car, thereby aligning with the Mayor's target. Members were further advised that the developer would provide a £20,000 contribution towards active travel improvements.
- Members noted that the scheme would provide approximately 24% 3 bedroom accommodation against a policy target of 25% and expressed concern regarding the implications of not achieving the target. In response, Gary Murphy (Principal Planning Officer) advised that whilst officers sought to achieve policy targets wherever possible, this could not always be achieved on every site. It was explained that the provision of family sized accommodation depended upon the scale and form of development being proposed. Through negotiations during the application process, officers had secured an increase in the number of family sized units. Whilst acknowledging a marginal shortfall against policy, it was emphasised that this needed to be balanced against the wider planning benefits and overall housing delivery associated with the scheme.

Colin Leadbeater (Development Management Area Manager) additionally stated that a number of amendments had been secured throughout the application process, including through public engagement, in order to minimise impacts upon neighbouring residents. Taking all considerations into account, officers had considered that the provision of 24% family sized accommodation represented an acceptable level when balanced against the potential impacts associated with a more intensive form of development and the wider material planning considerations set out within the committee report.

Victoria McDonagh (Development Management Service Manager) further advised that 4 of the 11 affordable housing units would comprise 3 bedroom homes, representing 36% of the affordable housing provision and therefore a

higher concentration of family sized accommodation within the affordable housing element.

- Members expressed concern regarding the adequacy of parking provision for future residents and visitors and suggested that insufficient parking would lead to increased pressure on surrounding streets. In response, Victoria McDonagh (Development Management Service Manager) advised that Local Plan parking standards represented maximum standards and that car free developments were expected to form the starting point for proposals in locations with good public transport accessibility. It was explained that the borough had a target to deliver 2,325 homes per year whilst simultaneously seeking to improve air quality, reduce congestion and support healthier and more sustainable travel patterns. It was noted that, even if maximum parking standards were applied, provision would equate to approximately 54 spaces and this would create significant design challenges. Officers were required to balance parking provision against wider considerations including air quality, public realm quality, amenity space, landscaping, tree planting and urban greening. Members were further advised that policy would support only the provision of the 3 disabled parking spaces in this instance. However, the developer had proposed a total of 12 parking spaces, including the 3 disabled bays. Officers considered this to represent an appropriate balance between parking provision and the delivery of a high-quality public realm.

John Fletcher (Team Leader - Development Control, Transport Planning) advised that future residents would not be eligible to obtain parking permits and therefore would not be able to generate overspill parking demand within the CPZ during its operational hours. It was highlighted that car free developments had been delivered across the borough for approximately 25 years without causing widespread congestion. It was considered that providing greater levels of parking would encourage additional traffic, congestion and road safety concerns. The car free approach was therefore regarded as consistent with sustainable development principles and the Mayor of London's transport objectives.

- In response to further questions concerning parking space provision for disabled residents, the Chair clarified that Blue Badge holders residing within the development would be eligible to apply for on street disabled parking. It was additionally confirmed that restrictions relating to parking permits would not apply to Blue Badge holders and that they could apply for a personalised disabled parking bay linked to their registered vehicle if required.

John Fletcher (Team Leader - Development Control, Transport Planning) further advised that Condition 34 required the submission of a revised Car Park Management Plan. It was explained that officers did not wish parking spaces to be sold alongside individual dwellings as this would reduce flexibility. Instead, officers favoured the annual allocation of parking spaces based upon need, with priority afforded to those with the greatest requirements, including Blue Badge holders and potentially families occupying larger dwellings.

- Members sought further clarification on where delivery drivers would park when servicing the development. In response, John Fletcher (Team Leader - Development Control, Transport Planning) advised that an access road would be available from Fairview Crescent, enabling refuse vehicles and delivery drivers to enter, stop and undertake deliveries. It was further mentioned that the Delivery Management Plan estimated approximately 16 delivery vehicle movements per day, equivalent to 1 or 2 vehicles per hour.
- In noting concerns that many residents required access to a vehicle in order to travel to work, members questioned how this would be accommodated. In response, John Fletcher (Team Leader - Development Control, Transport Planning) advised that the development was proposed as a car free scheme and prospective residents would be informed of this prior to occupation. It was suggested that individuals requiring a vehicle, might find alternative developments more suitable. It was noted that other developments within the borough, particularly those in less accessible locations, often provided higher levels of parking provision. It was considered that the proposal was appropriate for residents who did not require a car and who could benefit from the site's strong public transport accessibility.

David Glover (Head of Planning and Development Services) additionally noted that many smaller developments across the borough included parking provision, although these proposals did not routinely come before Planning Committee because they fell below the threshold requiring consideration by the Planning Committee. It was noted that such developments were often located in less accessible areas, particularly within the northern part of the borough, where parking provision tended to be greater.

- As a final query, members sought further clarification regarding the meaning of financial viability and the manner in which it was assessed. In response, Victoria McDonagh (Development Management Service Manager) explained that financial viability involved assessing the value generated for a development, and considering whether the value generated was greater than the cost of developing it. It was additionally explained that this process produced what was known as a residual land value. It was further stated that a range of factors were incorporated into viability assessments, including the Gross Development Value derived from private and affordable housing sales, development costs, contingencies and other financial assumptions. The resulting residual land value was then compared against a benchmark land value, representing the value of the land based upon its existing or appropriate use. This comparison was used to determine whether a development was financially viable and the level of affordable housing that could reasonably be delivered.

DECISION

Voting on the original decision to grant planning application, having considered the application, was as follows (4 in favour of granting planning permission and 4 in favour of refusal). The application was approved on basis of the casting vote from the Chair.

At the conclusion of the 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 8:15pm.

Given the subsequent identification of Councillor I.Ahmed not having been present for the whole debate, following the adjournment of the meeting, and clarification that he would not therefore be able to participate in the vote on the application, the vote was amended as follows (3 in favour of granting planning permission and 4 in favour of refusal).

As a result of the outcome of the discussion and amended vote, the Committee **RESOLVED** to defer the decision for the following reason(s):

- As the majority of Members on the Committee had indicated that they were minded to refuse the application, it was agreed to defer a final decision to a future Committee meeting in order to enable a further report to be provided addressing the indicative reasons outlined as the basis for refusal, including:
 - i) insufficient provision of affordable housing;
 - ii) insufficient parking provision on-site and impact of congestion on surrounding streets,
 - iii) lack of community space;
 - iv) lack of on-site play space for older children;
 - v) insufficient provision of family sized housing;
 - vi) harm to neighbouring amenity including loss of daylight; and
 - vii) impact on non-designated heritage asset and character to the streetscene.

Voting on the above decision was unanimous and accordingly, the application was deferred to allow for further assessment and consideration of the matters identified by the Committee.

5. 25/0810 - 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.

RECOMMENDATION

That the Committee resolve to GRANT planning permission subject to:

- (1) The conditions and informatives required to secure the matters identified within the main committee report and supplementary report.

Colin Leadbeatter (Development Management Area Manager) introduced the report, advising members that the application sought full planning permission for the addition of a multi-use games area facility comprising 2 artificial sports pitches. The pitch to the west had been marked on the plans for football and the pitch on the east had been marked on the plans for hockey. The 2 artificial sport pitches combined would 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 were proposed for the 2 artificial sport pitches. A 2m acoustic fence was also proposed along the eastern and southern sides of the eastern pitch. In addition, the proposals sought 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 was proposed towards the western boundary, to serve the relocated cricket pitch.

Attention was also drawn to the supplementary report circulated in advance of the meeting, which noted the receipt of further representations, comprising 12 new objections and 8 additional comments from previous objectors, together with the officers' responses. The additional representations did not raise any new material planning considerations that would alter the officers' assessment or recommendation. The recommendation remained to grant planning permission, subject to the conditions and informatives required to secure the matters identified within the main committee report and supplementary report.

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

- Deborah Nyman began by stating that she had resided in Roe Green Village, a valued conservation area since the late 1980s and was speaking on behalf of the Roe Green Village Residents' Association, which represented more than 250 households, together with other nearby residents affected by the proposal.
- The speaker expressed that residents were surprised that the application had been brought before the Committee, noting that the Committee had previously considered 2 similar proposals submitted by Kingsbury High School. It was noted that the second scheme had not been supported and was subsequently withdrawn during the appeal process, resulting in an award of costs in favour of the Association by the Planning Inspectorate.
- Deborah Nyman advised that many residents objected to the current proposals on the grounds that they were neither environmentally appropriate nor compatible with the character of the local community. It was further noted that these concerns had been set out in detail within representations submitted to Members and the Case Officer.
- Whilst emphasising that Roe Green Village had long been an established family community that had consistently supported the school and facilities intended solely for school use, concern was expressed that the current proposals were confusing, ambiguous and lacked sufficient clarity.
- The speaker further advised that a sunken gas main had been identified within the application site. In her view, as the infrastructure was located on school land, more stringent Health and Safety Executive (HSE) guidance should apply. It was felt that these requirements had not been adhered to and that, without compliance, the application was invalid and should not proceed.

- Deborah Nyman also maintained that the application was misleading, contending that it was not merely a modest proposal to improve school sports facilities but instead represented a significant intensification of use, including provision for commercial community hire. It was considered that such use would be incompatible with the historic suburban character of the neighbourhood and contrary to Brent's Green Neighbourhoods Action Plan, noting that the whole application site was located within the area covered by the Plan.
- Concern was also expressed regarding the replacement of natural grassland with a 3G playing surface. Deborah Nyman felt that this conflicted with the environmental objectives of the Green Neighbourhoods Action Plan. Reference was made to other recent sports-related developments within the borough which, in her view, had evolved into disruptive operations and had adversely affected the amenity of neighbouring residents.
- In concluding her presentation to the Committee, Deborah Nyman requested that the Committee either refuse the application or defer consideration of the matter in order to enable local residents to comment on the changes made to the original application.

The Chair thanked Deborah Nyman 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:

- As an initial question, clarification was sought regarding the speaker's earlier point in her presentation to the Committee that the application was misleading and lacked clarity. In response, Deborah Nyman clarified that she considered the application to be misleading because a number of matters contained within the original proposals had subsequently changed. It was explained that a new block plan had been introduced only recently and contained a number of elements that did not correspond with the technical documents previously submitted in support of the application. In her view, the revised plan differed significantly from the original proposals and should have been submitted as a new planning application.
- Questions were raised from members on whether local residents had been consulted on the revised plans. In response, Deborah Nyman advised that residents had not been consulted on the revised plans and further commented that there had not been a public consultation from the outset of the application process, which she considered disappointing given the level of engagement and communication that residents had historically maintained with the school.
- Details were sought from members regarding the potential impact and harm that the proposed development could have on local residents. In response, Deborah Nyman expressed that Roe Green Village was a Conservation Area and highlighted concerns regarding development in close proximity to residential properties. It was noted that, as with a previous application submitted by the school, the proposed development would be located adjacent to the rear boundaries of residents' gardens. It was further mentioned that the

original plans had included lighting columns measuring approximately 15 meters in height, whilst the proposed roofs were approximately 7.5 meters high. Whilst acknowledging that Roe Green Village comprised a relatively small community of approximately 250 households, she emphasised the importance that residents attached to the character and appearance of the area.

In continuing the response, Dan Hulsmann, supporting the speaker, advised that residents within the conservation area faced limitations in undertaking alterations to their properties that might mitigate the impacts of noise. It was stated that the installation of double glazing was already difficult within the Conservation Area and that residents would therefore be unable to adequately protect themselves from the effects of the proposed development. Concern was expressed that the proposal would have a significant impact on nearby residents through both noise and lighting. It was also stated that the low roof heights within the area enabled sound to travel considerable distances and that local residents already experienced regular disturbance from events held at the school. It was considered difficult for residents to shield themselves from existing noise impacts and it was felt that the proposed development would exacerbate these concerns.

- Members requested further information regarding the environmental implications of artificial sports pitches. In response, an additional supporting speaker advised that the intention was to address existing waterlogging issues by excavating the site to a significant depth and installing land drains and associated infrastructure to remove water from the area. In referring to information contained within the committee report, it was indicated that approximately 20,000 sqm of ground would be excavated. Concern was expressed regarding the scale of works required, with it being noted that substantial volumes of material would need to be removed from the site and replaced in order to install an artificial playing surface. It was further stated that the proposed drainage arrangements raised concerns regarding the displacement of surface water. In his view, water removed from the school site would need to be directed elsewhere and he raised concerns regarding the potential implications for neighbouring properties, particularly those in Manor Close, which were situated in close proximity to the site. It was expressed that local residents held strong concerns regarding the potential environmental consequences of the proposal.
- Members sought clarification regarding the extent to which existing facilities at the site currently affected neighbouring residents. In response, Deborah Nyman advised that the existing facilities did not have a significant impact on residents. and did not operate late into the evening. Concern was expressed that potential commercial use of the site would result in longer operating hours and increased activity levels.

At this stage in proceedings, the Committee agreed to apply the guillotine procedure under Standing Order 62(c) in order to extend the meeting for a period of 30 minutes to enable continued consideration of the planning application and remaining business on the agenda.

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

- Alex Thomas (Headteacher, Kingsbury High School) began by expressing his support for the proposed Multi Use Games Area (MUGA) on the school's playing field.
- It was noted that the school had worked positively and collaboratively with officers in addressing all matters raised during the assessment of the application and that, as a result of those discussions, amendments had been made to the scheme, including refinements to the positioning of the facilities, in order to achieve an appropriate balance between meeting the school's needs and protecting the amenity of neighbouring residents.
- In setting out the rationale for the proposal, the speaker advised that the existing playing field was no longer fit for purpose. It was explained that substantial areas of the current facility suffered from poor drainage and an uneven surface, rendering them unsuitable for use during both winter and summer periods. As a consequence, the school was frequently unable to meet the demands of students, the curriculum and pupils from the co-located junior and infant schools from Roe Green.
- It was highlighted that the proposed MUGA would provide a purpose-built, high-quality sports facility that would significantly enhance sporting opportunities for pupils. The facility would support a broad range of activities, including football, netball, hockey and other physical education programmes. It was further noted that the all-weather surface would enable sport and physical activity to take place throughout the year, reducing disruption caused by adverse weather conditions. The proposed lighting would also facilitate the safe continuation of after-school sport, clubs and activities during the darker winter months.
- Alex Thomas further expressed that the proposal would contribute towards the promotion of healthier lifestyles, particularly in light of increasing concerns regarding childhood obesity. It was considered that the facility would support the wellbeing of pupils and assist in the development of teamwork, leadership and sportsmanship skills. It was additionally highlighted that the benefits of the proposal would extend beyond the school community, with the facility also being made available to local sports clubs and community groups, thereby increasing access to high quality sporting provision within the area.
- Addressing the design of the scheme, Alex Thomas explained that the proposal had been carefully designed to integrate appropriately within its surroundings. It was noted that the MUGA would be located towards the southern part of the site and would benefit from substantial existing landscaping along the site boundary. It was further explained that this mature vegetation, together with the colour and design of the fencing, would provide effective screening and significantly reduce views from neighbouring residential properties.

- The speaker further advised that the lighting strategy had been specifically designed to minimise light spill beyond the site boundaries. Given the significant separation distances between the facility and neighbouring properties, it was noted that officers had concluded that the proposal would not result in any unacceptable impact on residential amenity. It was therefore considered that appropriate mitigation measures had been incorporated into the scheme to ensure that sporting activities could take place without causing unreasonable disturbance to local residents.
- In concluding his presentation to the Committee, Alex Thomas highlighted that the proposal had received considerable community support. It was noted that 43 letters of support had been submitted by parents, local residents and sports organisations, demonstrating a significant demand for improved sporting facilities. It was further stated that the proposal would deliver lasting educational, health and community benefits for current and future generations of pupils and local residents and expressed the view that children attending Kingsbury High School should have access to the same opportunities already enjoyed by young people elsewhere in the borough. It was additionally noted that the committee report had confirmed that the proposal complied with the relevant policies of the London Plan 2021 and the Brent Local Plan 2019-41 and therefore requested that members support the officer recommendation and grant planning permission.

The Chair thanked Alex Thomas 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:

- As an initial query, members sought clarification regarding the extent of public consultation undertaken in relation to the proposals. In response, Alex Thomas advised that, during 2025, consultation had been undertaken with 89 nearby properties. It was noted that consultation had also included local organisations and associations, including the Friends of Eton Grove Park and the Roe Green Village Association. Members were further advised that notification letters had been issued, a press notice had been published in April 2025 and site notices had been displayed in May 2025. Following amendments made to the proposals in consultation with planning officers, a further round of consultation had been undertaken in January 2026. This had included all those originally consulted together with any additional properties that had submitted representations in response to the initial application.
- Further clarification was sought on how many objections had been received from local residents. In response, Alex Thomas advised that around 9 objections had been received. It was noted that the committee report contained a summary of the concerns raised together with the mitigation measures proposed in response to those concerns.
- Details were sought on what facilities were currently available at the school. In response, Alex Thomas advised that the school did not currently provide any outdoor all-weather sports facilities. It was explained that the upper school site, accommodating approximately 1,000 pupils, contained a single gymnasium,

whilst the lower school site, also serving approximately 1,000 pupils, contained 2 smaller gymnasiums. Members were further advised that the proposed facility would be available for use by the local community and clarified that the school itself would be responsible for managing the bookings and operation of the facility. It was emphasised that the proposal did not involve a commercial operation managed by a third-party organisation.

- Members questioned how the school intended to manage the proposed facilities. In response, Tara Randall, supporting the speaker, advised that she had served as Lettings Manager at the school for 10 years. It was stated that the school had extensive experience in managing community use of its facilities and was currently well used by community groups and youth organisations. Members were advised that only within the previous 12 months had any concerns been reported regarding traffic or access arrangements. By way of example, it was noted that a Romanian church had hired facilities at the school on Sunday mornings for approximately 6 years and had operated successfully. Members were further informed that Hindu community groups utilised the site during Navaratri celebrations in October. It was considered that these arrangements were well managed and that the school had adequate parking provision to support such activities. In acknowledging concerns regarding traffic and congestion, reassurance was provided that where complaints had been received, they had been fully investigated, reviewed and responded to by the school. It was suggested that some congestion issues may have been attributable to other events occurring in the wider area, including funfairs and similar activities, rather than to the school's operations.

At this point during the proceedings, the Committee agreed to apply the guillotine procedure under Standing Order 62(c) in order to extend the meeting for a further period of 30 minutes to enable continued consideration of the planning application and the remaining business on the agenda.

- In continuing, members expressed concern regarding the potential for evening use of the facility to generate noise disturbance for local residents and sought clarification regarding how any complaints would be addressed. In response, Alex Thomas advised that the proposed facility would be located on the Princes Avenue upper school site. It was noted that the site benefited from parking provision and that issues relating to access and parking capacity had been fully assessed within the application. It was confirmed that the parking provision available at the upper school was considered sufficient to meet the anticipated demand arising from community use of the proposed facility. In relation to noise, it was conveyed that specialist reports had been commissioned and assessed as part of the planning application process. It was noted that the findings of those reports, together with the conclusions reached by planning officers, indicated that the anticipated noise levels would not result in detrimental impacts upon neighbouring residents. Tara Randall, supporter of the speaker, added that the proposed hours of operation were already specified within the report and that use of the facility would cease no later than 9pm, with activities potentially ending earlier on some occasions. It was stressed that the school was committed to complying fully with any conditions attached to a planning

permission and that no use would take place beyond 9pm, including at weekends.

- Referring to concerns regarding flooding, members understood that artificial turf could increase surface water runoff and contribute to flooding. Clarification was sought regarding the applicant's understanding of flood risk associated with the proposal. In response, Tara Randall, supporter of the speaker, advised that the technical reports submitted in support of the application identified a very low, or minimal, flood risk. It was explained that the proposed construction would incorporate a sustainable underground drainage system designed to manage the anticipated levels of surface water. Members were further advised that the planning application documentation detailed how the drainage system would operate and assessed existing flood risk conditions, which were identified as low or minimal. In her view, the sustainable drainage system would address these issues effectively and confidence was expressed in its operation based on the feasibility work that had been undertaken.
- Highlighting concerns relating to potential toxic PFAS chemicals associated with artificial turf raised further questions on whether the proposed surface would be an environmentally sustainable product. In response, Tara Randall, supporter of the speaker, expressed that she had also been concerned regarding reports about the use of rubber crumb infill materials, which had first gained attention several years previously. It was explained that the project had not yet progressed to the detailed design stage of the playing surface. However, in her role supporting the school's sustainability objectives and following the introduction of the school's Climate Action Plan in December 2025, Tara Randall emphasised that the school was keen to utilise newer forms of biodegradable or non-toxic turf. It was confirmed that the school was not seeking to install a traditional 3G rubber crumb surface, particularly given that the facility would be used by children and young people.
- The Chair then asked the applicant to outline the benefits of the proposed facilities and what potential opportunities pupils would lose if the application was not approved. In response, Alex Thomas advised that almost every secondary school within the borough benefited from similar facilities. It was stated that the school wished to provide the same opportunities for Kingsbury High School students to participate in sport and physical activity throughout the year, rather than only when weather and ground conditions permitted use of the existing playing fields. It was emphasised that the proposal sought to provide pupils at Kingsbury High School with the same sporting opportunities available to young people across Brent and London.

The Chair thanked Alex Thomas and Tara Randall 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:

- Members were keen to seek details on whether there was an opportunity for conditions to be imposed in relation to the material proposed for use within the artificial turf. In response, Colin Leadbeatter (Development Management Area

Manager) advised that a condition had already been recommended requiring details of the materials to be used for the artificial turf surfaces. Whilst acknowledging the concerns regarding the potential safety implications associated with chemicals and microplastics within artificial turf, it was explained that these matters did not fall within the scope of land use planning and were instead regulated through a separate statutory regime under UK REACH product safety legislation. The Committee were further advised that Sport England, as the statutory consultee for sporting pitches, was undertaking ongoing work to develop a framework regarding the types of sports pitch surfaces to be utilised in future. Members were informed that the recommended condition was consistent with Sport England's consultation response on the application, which was a material consideration that the Council was required to take into account. It was confirmed that, should planning permission be granted, detailed specifications for the pitches would need to be submitted and agreed in consultation with Sport England following the resolution, if planning permission was granted.

- In response to further questioning regarding the positioning of the sports pitches and the separation distances between the pitches and neighbouring residential properties, officers presented slides taken from the drawing pack to illustrate the proposed block plans. Members were additionally advised that none of the proposed fences would exceed the 45 degree line requirements contained within SPD1. The nearest neighbouring properties were identified as Nos. 38 and 40 Grosvenor Crescent, located approximately 12 meters from the nearest fence, and Nos. 29 and 30 Manor Close, located approximately 11 meters from the nearest fence. Bacon Lane was located approximately 45.45 meters from the nearest fence. Officers further advised that the distance between the edge of the cricket pitch and the site boundary would be 12.84 meters. The distance between the edge of the cricket pitch and the boundary of the nearest property on Grosvenor Crescent would be 18.65 meters. Members were informed that the cricket pitch itself would not be enclosed by fencing, although ball stop fencing would be provided along the relevant boundary. The cricket pitch would otherwise remain open.
- In addressing earlier concerns raised by members regarding the proposed hours of operation, Colin Leadbeater (Development Management Area Manager) advised that a planning condition had been recommended, and agreed by the applicant, which would restrict the hours of operation in order to protect the amenity of neighbouring residents and to safeguard ecological interests, including bats and other flying species. Members were further informed that the permitted hours of operation varied throughout the year to reflect ecological considerations, including mating seasons. Colin Leadbeater detailed that from October to March the facilities would operate between 8am and 9pm, with floodlights required to be switched off no later than 9:15pm. During April, the facilities would operate between 8am and 7:30pm, with floodlights switched off no later than 7:45pm. Between May and August, the facilities would operate between 8am and 8pm, with no floodlighting permitted. During September, the facilities would operate between 8am and 7pm, again with no floodlighting permitted. It was emphasised that floodlighting would only

be permitted during the darker months of the year and would be subject to strict controls regarding switch-off times.

Victoria McDonagh (Development Management Service Manager) added that, when originally submitted, the application had proposed operating hours of 8am to 9pm on weekdays and 8am to 11pm at weekends, including the use of floodlighting. Following consideration of consultee responses regarding residential amenity and ecological matters, including impacts on bats and hibernation periods, the proposed operating hours had been reduced and floodlighting had been removed entirely during the summer months.

At this stage during the proceedings, the Committee agreed to apply the guillotine procedure under Standing Order 62(c) in order to extend the meeting for a further period of 30 minutes to enable continued consideration of the planning application and the remaining business on the agenda.

- In continuing, members referred to Policy G4 of the London Plan concerning protected open space and requested further clarification as to why officers considered the proposal acceptable despite the loss of part of that open space. In response, Colin Leadbeatter (Development Management Area Manager) advised that the playing field was designated as protected open space under both the Local Plan and London Plan Policy G4, which generally restricted the loss of such land. It was explained that paragraph 104 of the National Planning Policy Framework (NPPF) permitted development on playing fields where an assessment demonstrated that the land was surplus to requirements, where equivalent or improved replacement provision was secured, or where alternative sports and recreational provision would generate benefits that clearly outweighed the loss. Officers had relied upon the third of these points. Sport England had confirmed that the proposal satisfied its exception test and considered that the benefits arising from the new facility significantly outweighed the loss of part of the existing playing field, which was not suitable for year-round use. It was further noted that the Football Foundation had confirmed an identified demand for additional MUGA provision across Brent and that England Hockey had also confirmed a requirement for additional hockey facilities, particularly for evening training sessions and weekend use. It was added that the existing cricket provision would be retained and relocated rather than lost.
- Views were then sought regarding whether it was felt officers were confident that the proposed planning conditions would adequately mitigate the potential for increased noise nuisance raised by local residents. In response, Colin Leadbeatter (Development Management Area Manager) highlighted that conditions had been imposed restricting the hours of operation, with activities generally ending before 8pm and only in limited circumstances continuing until 9pm. It was explained that Sport England had established acceptable noise thresholds for residential receptor locations and that a Noise Impact Assessment submitted with the application had demonstrated compliance with those standards. Members were advised that all identified residential receptor groups had been assessed as falling below Sport England's threshold of 50 decibels LAeq (A-weighted Equivalent Continuous Sound Level). Predicted

noise levels ranged between 44 and 49 decibels, depending on location. It was noted that there remained an additional margin below the applicable threshold. Members were further advised that a 2 meter high acoustic barrier would be installed around the hockey pitch, which was the pitch closest to residential properties, excluding the existing cricket facilities. In addition, no amplified sound would be permitted in association with use of the pitches. Taking these mitigation measures together, officers considered the impact on neighbouring residential properties to be acceptable. It was confirmed that this conclusion was supported by the Council's Environmental Health officers.

- Details were sought on whether there were any specific heritage or conservation considerations that should be taken into account. In response, Victoria McDonagh (Development Management Service Manager) advised that the impact of the proposal upon the conservation area had been fully assessed. This assessment included consideration of views into and out of the conservation area, including the visibility of floodlighting columns. Officers had considered the siting of the development to be acceptable within the context of the conservation area. Members were advised that, even if some degree of harm were identified, such harm would be categorised as less than substantial and at the lower end of the scale, with the public benefits of the proposal outweighing that harm. It was additionally mentioned that the assessment had considered the impact upon the main school building, which was identified as a non-designated heritage asset. Heritage considerations had been fully reviewed by the Council's Heritage Officer.
- As a final query, members questioned whether community rates would be available for use of the proposed facilities. In response, Victoria McDonagh (Development Management Service Manager) advised that Condition 18 required details of the proposed hire charges to be submitted and approved. It was explained that the condition also required the applicant to demonstrate how access to the facility would be provided to a diverse range of community groups and specifically how provision would be made for households on low incomes. Members were informed that reduced rates would be available for low-income families.

DECISION

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

- (1) The conditions and informatives required to secure the matters identified within the main committee report and supplementary report.

(Voting on the above decision was as follows: 7 in favour of granting planning permission and 1 in favour of refusal).

6. 25/1022 - 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).

RECOMMENDATION

That the Committee resolve to GRANT planning permission subject to:

- (1) The prior completion of a satisfactory legal agreement; and
- (2) The conditions and informatives, as set out in the committee report.

Curtis Thompson (Career Grade Planning Officer) introduced the report, advising members that the application sought full planning permission for the demolition of a garage block and erection of a new dwellinghouse with associated amenity space, provision for new pedestrian access and cycle and refuse storage. The recommendation remained to grant planning permission, subject to the conditions and informatives set out within the main committee report, together with the prior completion of a satisfactory legal agreement.

The Chair thanked Curtis Thompson 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 Satbir Singh (who had registered to speak as an objector) to address the Committee in relation to the application, who highlighted the following points:

- Sabir Singh began by expressing that Brent had been his home since 1987. It was explained that, in 2020, he and his wife had purchased their first home, a top floor flat within Thanet Lodge on Mapesbury Road, following almost 10 years of saving. It was noted that their first child had been born shortly after they moved into the property.
- Following occupation of the flat, Sabir Singh described that the top floor flats constructed by the freeholder were, in his opinion, of a dangerously substandard nature, and had serious deficiencies relating to fire safety, fire compartmentation and cladding.
- Sabir Singh further advised that, in 2025, his mother, who had previously worked for Brent Council for many years, had suffered a stroke whilst living with Alzheimer's. It was explained that his family had subsequently relocated across the borough in order to provide care for her, as they considered that local social care services were unable to provide the level of support required. It was stated that, as a consequence, his flat had been placed on the market and that a purchaser had been secured in September 2025 despite the concerns he had identified regarding the property. However, it was reported that the developer

had refused to confirm that the ground rent account was up to date and had also refused consent for the sale to proceed.

- Sabir Singh further expressed that his mother had passed away in January 2026 and reported that, shortly afterwards, the developer had informed him that any future sale of the property would require payment of £15,000, which he stated had been described as “compensation” for objections he had submitted in relation to previous development proposals. He further reported that, in February 2026, the developer had stated an intention to go “one by one” through everyone who had ever objected to his plans and “make them suffer”. Sabir Singh advised that both conversations had been recorded and referred to the Metropolitan Police, whom he stated had subsequently raised concerns directly with the developer.
- The speaker further alleged that, whilst preparing the current development proposal, the developer had reported him and other leaseholders to their mortgage lenders, claiming they were in breach of their obligations and threatening forfeiture proceedings. It was stated that mortgage lenders had confirmed that no such breaches existed and expressed the view that these actions had created an atmosphere of intimidation. Sabir Singh highlighted that, as a result, some leaseholders were now reluctant to submit objections openly and, where objections had been submitted, they were often made anonymously.
- Referring to his professional experience working with MPs, journalists and City Hall on housing related matters, Sabir Singh acknowledged the significant need for additional housing within London. However, he urged Members to consider the developer's conduct and the credibility of commitments made in support of the application and expressed the view that granting planning permission would reward the behaviour he had described and could risk undermining public confidence in the Council and its decision-making processes. Reference was also made to the Council's responsibilities under the Local Government Act 1972 and the Representation of the People Act 1983, emphasising the importance of ensuring that individuals were able to participate in public decision making without intimidation.
- In concluding his presentation to the Committee, Sabir Singh urged the Committee to refuse the application and to utilise all available powers to hold the developer to account.

Following the representation made by Sabir Singh regarding his experiences with the applicant, David Glover (Head of Planning and Development Services) expressed sympathy regarding the circumstances described. However, he advised that the Committee was required to determine the application based solely on the proposal before it and the relevant planning considerations. It was explained that the Committee could not take into account allegations relating to the behaviour of the applicant, their previous conduct or matters relating to fire safety associated with other developments. Whilst acknowledging the concerns raised, it was confirmed that such matters were not legally capable of being considered in the determination of the application.

Paul Weeks (Senior Planning Lawyer) reinforced this advice, explaining that the application was required to be assessed solely on its own merits, having regard to relevant planning policies and material planning considerations. He advised that the matters raised by the objector did not relate to the planning acceptability of the proposed development and therefore could not be taken into account by the Committee. It was reiterated that the Committee was required to focus their consideration on the planning merits of the proposal and its compliance with the relevant planning policy framework.

In considering the response, Satbir Singh sought further clarification, noting that part of the Committee's role was to facilitate fair participation and consultation and questioned how concerns relating to alleged intimidation of members of his leasehold community, whom he stated had been discouraged from participating in the planning process, could be addressed if they could not be considered by the Committee. In response, the Chair advised that the Committee was convened solely to consider the planning application before it. Whilst acknowledging the concerns raised, the Chair suggested that alternative legal advice should be sought in relation to those matters. It was further advised that, should Satbir Singh wish to pursue the matter, he could subsequently approach officers or the Council's planning lawyers for guidance. However, the Committee was unable to consider or discuss the alleged actions of the developer as they did not constitute material planning considerations. David Glover (Head of Planning and Development Services) further emphasised that the Committee was required to only consider matters which it was legally entitled to take into account.

The Chair then thanked Sabir Singh 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 were keen to seek details regarding the specific concerns that residents had raised in relation to the application. In response, Satbir Singh advised that residents considered the proposal to represent an example of overdevelopment. It was explained that Thanet Lodge comprised more than 40 apartments and was situated on a constrained site with limited land available to the rear and side of the building. It was stated that part of the surrounding land had already been separated from the wider site in connection with the construction of the developer's own dwelling. It was noted that the proposed dwelling would be located behind the refuse and recycling area serving the residential block. It was further stated that vehicle access to the rear of the building was approximately 2 to 3 meters in width and that the proposal would involve replacing the existing garages located adjacent to this access route with a new dwelling. In his view, the proposed dwelling would be positioned immediately adjacent to, and directly facing, the existing apartment building. Satbir Singh further advised that residents had concerns regarding the effect of the proposal on the character and appearance of the area, particularly given its location within a conservation area. Concerns had also been raised regarding the removal of trees within the garden area associated with the building. It was explained that the garden currently provided amenity space for the residents of more than 40 apartments within the development. It was further mentioned that approximately 5 or 6 parking spaces were located to the rear of the building, 4 of which formed part of individual leasehold interests. It was stated that these

parking arrangements would be removed or altered as part of the proposed development. Concerns were expressed that the proposal created a conflict between the proposed development and existing leasehold property rights, as it would involve alterations affecting parking spaces held under leasehold ownership and would encroach upon the communal garden area. In concluding his response, Satbir Singh acknowledged the need for additional housing in the borough but expressed the opinion that this proposal did not represent an appropriate solution to meeting housing need.

The Chair thanked Sabir Singh for responding to the Committee's questions and then moved on to consider a further request to speak which had been received from Councillor Hack (who had registered to speak as a Ward Councillor), who highlighted the following points:

- Speaking in relation to the application, Councillor Hack, as local Ward Councillor, addressed the Committee and urged members to refuse planning permission. In his view, the proposal did not constitute a modest redevelopment but instead represented an overdevelopment of a constrained back land site. It was considered that the scheme would result in significant harm to neighbouring residents, the surrounding environment and the character and appearance of the Brondesbury Park Conservation Area.
- Councillor Hack expressed that the proposal would replace an open and landscaped area with an intrusive residential development which, in his opinion, was entirely out of keeping with its surroundings. It was noted that the spacious rear gardens within the area formed an important characteristic of the Brondesbury Park Conservation Area and contended that the proposal would erode that character. This was considered to be contrary to Brent Local Plan Policy BHC1 and London Plan Policy D3.
- Councillor Hack further advised that residents of Thanet Lodge would experience a material loss of residential amenity should the application be approved. It was stated that the proposal would replace an existing low level and unobtrusive structure with a significantly larger and more dominant building. In his view, this would result in increased overlooking, a loss of privacy, reduced levels of daylight and a greater sense of enclosure for neighbouring occupiers.
- Concern was also expressed regarding the loss of garden space and vegetation within the site. Councillor Hack additionally raised concerns regarding leaseholder rights, noting that the proposal would result in the loss of existing garages and associated parking spaces which, he advised, formed part of long-established legal arrangements affecting residents.
- Councillor Hack informed the Committee that a number of residents had wished to attend and address the meeting but had felt unable to do so due to concerns regarding intimidation by the freeholder.
- Councillor Hack further expressed that the application should not be considered in isolation and referred to what he described as a concerning history of

planning and building compliance matters associated with the wider site. It was stated that, around 2019, the freeholder had undertaken development works and that residents had subsequently reported subsidence and cracking within Thanet Lodge.

- Reference was also made to concerns that elements of a previously approved planning permission had not been implemented as approved. These concerns included the omission of an approved green roof, failure to undertake approved landscaping works, development extending beyond the approved garden boundary and the erection of structures within communal gardens without planning permission. Councillor Hack considered these matters relevant as they raised legitimate concerns regarding confidence in compliance with planning conditions attached to any future consent.
- As a local Ward Councillor, Councillor Hack expressed serious concern regarding what he viewed as a recurring pattern of non compliance with planning requirements and a disregard for the interests of local residents. He advised that Members were being asked not merely to approve an additional dwelling but to permit further development on a constrained site within a Conservation Area despite, in his view, the significant impacts on residential amenity, green space, biodiversity, parking arrangements, drainage and the historic character of the area.

The Chair thanked Councillor Hack 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 expressed deep concern regarding allegations of bullying, intimidation and aggressive behaviour that had been referred to during the discussion and questioned whether there were any codes of conduct or standards expected of applicants participating in the planning process which were intended to prevent such behaviour. In response, Councillor Hack expressed that the concerns raised had been reported both to the Council and to the Metropolitan Police. Councillor Hack stated that more than 20 individuals had wished to attend the meeting, including both leaseholders and tenants of Thanet Lodge, in order to speak about a range of issues affecting the development and described the situation as concerning. He further highlighted concerns regarding potential drainage impacts and other material matters which, in his view, could arise as a direct consequence of the proposed development. Additional concerns were raised regarding policy compliance and affordability and it was suggested that the proposal would enable further actions by an individual whom he considered had demonstrated disregard not only towards local residents but also towards the Council. Councillor Hack added that, in his view, freeholders had a responsibility to treat residents with respect and to operate in accordance with the frameworks established under national legislation.
- Members asked Councillor Hack to describe the characteristics of the surrounding area. In response, Councillor Hack advised that the Brondesbury Park Conservation Area had largely been established during the late 19th

century and was characterised predominantly by substantial residential properties. It was stated that an important feature of the conservation area was the presence of land and green space, which contributed significantly to its character and appearance. He further advised that, in his view, the application should not be considered in isolation and referred to what he believed to be evidence that previous development and associated conditions had failed to enhance the conservation area. The opinion was expressed that the current proposal would not provide any enhancement to the character or appearance of the Conservation Area and would fail to preserve the historic qualities of an area which had been established during the late 1800s.

- Further concerns were expressed that, where a consultation process had allegedly been affected by bullying and intimidation, and representations had been made to that effect by 2 speakers, the integrity of the consultation process as a whole could be regarded as compromised. In response, Paul Weeks (Senior Planning Lawyer) advised that there were statutory requirements governing consultation on planning applications and that, provided those requirements had been met, the correct legal process had been followed. It was explained that it was not the role of the Planning Committee to make findings or judgements on the allegations that had been raised and that the Committee was not the appropriate forum in which to investigate such matters. He further advised that, insofar as he was aware, the consultation process had included the publication of site notices and other statutory notifications, thereby providing interested parties with the opportunity to submit representations. Whilst acknowledging that it could be a serious matter if individuals had been prevented from responding, it was noted that the Committee could not determine with certainty whether this had occurred.

Victoria McDonagh (Development Management Service Manager) provided further clarification that the initial consultation had been undertaken in April, during which 66 addresses had been consulted. This had included all properties within Thanet Lodge together with neighbouring properties adjoining and surrounding the site. It was noted that 2 further rounds of consultation had subsequently been carried out. The first, undertaken in December 2025, related to proposed amendments involving the enlargement of the parking area. A subsequent consultation exercise had then been undertaken on substantially the same plans in order to clarify the description of development and specifically to include the proposed extension of the hardstanding area, which constituted development and therefore needed to be captured within the application description. Members were informed that press notices and site notices had also been displayed and that the consultation process had been undertaken in accordance with all statutory requirements. Referring to the committee report, Victoria McDonagh advised that a total of 20 objections had been received, some of which comprised multiple submissions from the same respondent. Of those objections, 7 had been submitted without an address being provided. It was confirmed that those objections had nevertheless been taken into account as part of the planning process. Victoria McDonagh further advised that an application of this nature would only be referred to Planning Committee where 8 or more objections had been received from individuals residing within Brent or from businesses operating within the borough, with postal addresses

provided. It was confirmed that more than 8 valid objections meeting those criteria had been received, thereby triggering referral of the application to the Planning Committee for determination.

The Chair thanked Councillor Hack for responding to the Committee's questions and then moved on to consider a further request to speak which had been received from Michael Burroughs (who had registered to speak as the applicant's agent).

Prior to the agent's presentation to the Committee, David Glover (Head of Planning and Development Services) sought clarification from the applicant's representative in relation to comments made by an objector concerning parking spaces located within the application site. In referring to claims that certain residents held leasehold interests in parking spaces situated within the application area, it was questioned whether any party other than the applicant held a lease of 7 years or more over any part of the site. In response, Michael Burroughs, on behalf of the applicant, advised that his understanding was that there were 4 penthouse apartments and 4 associated parking spaces within the site. He further advised that the parking spaces were let on rental agreements for periods of less than 7 years.

Moving on, the Chair invited Michael Burroughs to address the Committee, during which the following points were highlighted:

- Michael Burroughs began by first responding to concerns that had been raised regarding objections and allegations of intimidation. He advised that 22 objections were recorded on the Council's website in relation to the application. In his view, this represented a significant level of engagement when considered against the approximately 60 consultation notifications that had been issued. It was noted, however, that not all objections appeared to be publicly available on the Council's website and expressed concern regarding this matter. It was stated that local authorities should operate transparently in the way decisions were reached and suggested that, where objections were being considered by the Council but were not available for public inspection or review by the applicant, this raised concerns regarding transparency.
- The applicant's agent further advised that planning permission could not be refused on the basis of the character or conduct of an applicant and that the Committee was required to determine the application on its planning merits.
- Michael Burroughs then outlined what he considered to be 3 key reasons in support of the proposal. Firstly, he advised that there was an outstanding planning permission for the redevelopment of the existing garages on the site by way of a single storey flat roof building. As a consequence, he considered that the principle of residential redevelopment on the site had already been established and accepted. Secondly, Michael Burroughs advised that, in the event the current application was refused, and an appeal was pursued unsuccessfully, the applicant would likely seek to build a flat roof building. It was noted that the surrounding area was predominantly characterised by buildings with pitched roofs and that flat roof buildings were relatively uncommon. Thirdly, Michael Burroughs referred to the officer recommendation, noting that the Case Officer had undertaken a detailed assessment of the

application and had recommended approval. In concluding his presentation to the Committee, Michael Burroughs stated that he considered the officer's analysis to be thorough and endorsed the conclusions reached within the committee report in full.

The Chair thanked Michael Burroughs 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:

- Member requested clarification regarding the proposed bin storage arrangements and asked for an explanation of the self-build development element of the proposal, including how self-build provisions related to development requirements and the applicant's intentions in that regard. Members also noted that the required Urban Greening Factor score of 0.4 had not been achieved and sought comments from the applicant's agent on this matter. In response, Michael Burroughs advised that the bin stores were proposed in exactly the same location as within the previously approved scheme. It was stated that the Council had approved the bin store arrangements in that position previously and there was no reason to indicate that they should not be approved again. In relation to self-build development, it was explained that the concept was initially introduced in connection with SCIL. It was noted that a self-builder was defined as an individual who intended to live in the dwelling they had constructed for a period of 3 years. Such individuals were classified as self-builders and were eligible for exemption from SCIL charges. It was further noted that this would be relevant to the current proposal, as a SCIL exemption would apply in this case. It was also mentioned that an application for the exemption could only be made once planning permission had been granted. Michael Burroughs further explained that self-builders were also exempt from Biodiversity Net Gain requirements. It was stated that this affected the requirement for ecological reporting. It was added that, in this instance, the site was also exempt from Biodiversity Net Gain requirements because it constituted a small site. It was additionally noted that the site already benefited from consent for redevelopment and members were advised that, should Biodiversity Net Gain become a significant issue, reference could be made to the previously approved consent and associated design. Regarding the Urban Greening Factor, Michael Burroughs stated that planning policies recognised the difficulties associated with achieving urban greening targets on small sites and that a degree of flexibility was envisaged in such circumstances. He advised that the Urban Greening Factor for the proposal fell only marginally below the required score of 0.4. Michael Burroughs expressed the view that the particular circumstances of the site represented a good effort towards achieving the required level of urban greening. It was also noted that the site was currently predominantly concrete in nature, with little or no existing greenery, and stated that the development would result in the site becoming significantly greener than its current condition.
- Members requested a response to allegations of bullying and intimidation during the consultation process. In response, Michael Burroughs stated that he was unable to comment on the validity of the allegations, as he was not involved in the circumstances surrounding the consultation process. He advised that the

Council had issued 60 consultation notifications and had received slightly more than 20 responses. It was stated that there was no evidence within those responses to indicate that residents had been subjected to bullying. Members were further advised that the objections he had reviewed were typical planning objections and that none of them alleged bullying or intimidation.

- Views were sought on whether the agent considered the proposal, involving the redevelopment of a one-bedroom dwelling into a 3-bedroom dwelling, to constitute overdevelopment of the site. In response, Michael Burroughs stated that he did not consider the proposal to represent overdevelopment and advised that the scheme made full use of a developable site and that this approach was consistent with planning policy requirements.

The Chair thanked Michael Burroughs 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 first sought regarding the self-build development criteria and how the proposal satisfied the exemption from Biodiversity Net Gain requirements. In response, Victoria McDonagh (Development Management Service Manager) explained that self-build and custom build development referred to a dwelling that was constructed for the applicant's own occupation. It was noted that the dwelling could be physically built by a third party on behalf of the applicant and that there was no requirement for the applicant to undertake the construction work themselves. However, the dwelling must be intended for the applicant's own occupation and there was a 3-year period during which it could not be sold or occupied by another person. Victoria McDonagh further advised that there were a number of circumstances in which developments could be exempt from Biodiversity Net Gain requirements. One particular circumstance was the application of the de minimis test, where less than 25 sqm of habitat would be affected. Members were advised that in this case, the site plan extended into part of the car parking area and communal garden, where a tree was located. Whilst the submitted plans indicated that the tree would be retained, concerns had been raised by the Council's Tree Officer regarding the risk of damage to the tree during construction works due to the differing ground levels between the car park and garden areas. Victoria McDonagh advised that the Tree Officer had indicated, in principle, that the removal of the tree would be acceptable subject to appropriate replacement planting. It was explained that a tree represented approximately 41 sqm of habitat and, therefore, if the tree were affected, Biodiversity Net Gain requirements would be triggered if the development were not proceeding as a self-build scheme. The Committee was advised that, in similar circumstances, the Council had secured legal agreements requiring applicants to establish the biodiversity baseline value of a site. In the event that the development was not delivered as a self-build scheme, a requirement would then arise for Biodiversity Net Gain to be provided through offsite habitat credits. It was stated that this approach enabled the Council to secure the necessary mitigation. It was further explained that officers were required to assess the proposal on the

basis that it would proceed as a self-build development and, on that basis, it met the applicable exemption.

- Members questioned whether the design of the proposed dwelling would be in keeping with the Victorian style properties within the road or whether it would differ from the existing character of the area. In response, Curtis Thompson (Career Grade Planning Officer) advised that the proposal incorporated materials commonly found within the conservation area, including coping stones and red clay materials. It was noted that the appearance of the existing garages was currently unsightly and made no positive contribution to the character or appearance of the conservation area. It was stated that officers considered the scale and materials proposed for the dwelling would preserve the character and appearance of the Conservation area and that the scheme would deliver public benefits through the provision of a new family sized dwelling. Overall, officers considered the proposal to be sympathetic to the character of the area and compliant with relevant conservation objectives.

Victoria McDonagh (Development Management Service Manager) additionally noted that the Heritage Officer had been consulted on the proposal and had concluded that the development would preserve the character and appearance of the conservation area. It was further stated that the existing garages were of a more contemporary form of construction and were not considered to be of special interest. As a result, they did not contribute positively to the character and appearance of the area and there was no heritage objection to their removal. The Committee were informed that amendments had been sought by the Heritage Officer during the course of the application process, including revisions to the fenestration and materials in order to ensure greater compatibility with the surrounding area. It was clarified that these amendments had been made and the Heritage Officer was satisfied with the proposal from a heritage perspective.

At this point in the proceedings, the Committee agreed to apply the guillotine procedure under Standing Order 62(c) in order to extend the meeting by a further 30 minutes to enable continued consideration of the planning application and the remaining business on the agenda.

- Returning to the allegations of intimidation and bullying raised by a number of speakers, members requested confirmation as to whether the Council had been made aware of these matters. In response, Victoria McDonagh (Development Management Service Manager) confirmed that such matters had been raised and advised that the issues related to the behaviour of the applicant and did not constitute material planning considerations. It was noted that this position had been set out within the committee report.
- Referring to the receipt of 20 objections members questioned how many responses had been submitted in support of the proposal. In response, Curtis Thompson (Career Grade Planning Officer) advised that no responses of support had been received. Following up, members queried how many objections had been received in relation to the application, to which Curtis Thompson confirmed that 20 objections had been received, as detailed within

the committee report. Victoria McDonagh (Development Management Service Manager) added that all representations received in relation to planning applications were considered as part of the decision-making process, provided they raised material planning considerations. It was advised that applications were required by law to be assessed against the planning policies contained within the Development Plan. The Committee heard that a high number of objections would not, in itself, justify refusal of an application where the proposal was otherwise considered acceptable against policy requirements. Equally, a significant volume of support would not justify approval of a proposal that conflicted with the Development Plan or gave rise to identified planning harm.

- Clarification was sought by members on why the loss of green space arising from the proposed development had been considered acceptable. In response, Victoria McDonagh (Development Management Service Manager) advised that the extension to the car parking area would result in a minor encroachment into the communal amenity space, amounting to approximately 1% of that area. She further advised that the area currently occupied by the garages would be enhanced through new landscaping to the front and rear of the proposed dwelling. The loss of amenity space had therefore been weighed against the benefit of providing a new family sized dwelling.
- With reference to the increase in accommodation from a 2 bedroom scheme previously approved to a proposed 3 bedroom dwelling, members questioned whether the development would be out of keeping with the conservation area. In response, Victoria McDonagh (Development Management Service Manager) advised that planning permission had been granted in 2024 for a 2 bedroom house and that the current proposal sought permission for a 3 bedroom dwelling. The Committee was informed that the proposal complied with the space standards contained within the London Plan and would provide a private garden exceeding 50sqm. She further advised that, in terms of density and site usage, the proposal fully complied with the relevant space standards and was not considered to constitute overdevelopment.
- Further questions were raised on how many trees would be lost as a consequence of the development if it were to go ahead. In response, Victoria McDonagh (Development Management Service Manager) clarified that only one tree would be affected. It was stated that there was a likelihood that the tree would be severely damaged during development and would therefore require removal. However, a planning condition would secure the planting of 2 replacement trees to compensate for the loss. All remaining trees on the site would be retained.
- David Glover (Head of Planning and Development Services) advised that, whilst the Committee discussion had been taking place, officers had been undertaking further investigation regarding ownership interests within the application site. It was explained that planning legislation required applicants to complete the appropriate ownership certificate, declaring whether they owned all of the land within the application site, whether there were additional owners, or whether the identities or addresses of other owners were unknown. It was

noted that applicants were not required to demonstrate ownership at the point of submission but were legally required to complete the correct ownership certificate. As concerns had arisen following a statement by a previous speaker who had referred to leasehold interests within the application site. David Glover informed the Committee that officers had subsequently accessed Land Registry information and that this had raised doubts regarding the ownership certificates submitted with the application. It was noted that Certificate A had been completed, indicating that the applicant owned all land within the application site. However, in light of the existence of leasehold interests and references to other named parties, David Glover advised that there was uncertainty as to whether the correct ownership certificate had been submitted. It was therefore recommended that consideration of the application be deferred to a future meeting of the Planning Committee in order to verify that the appropriate ownership certificates had been completed.

- Further to this, a Member stated that they had reviewed the relevant legislation concerning self-build developments and noted that the definition referred to individuals or associations qualifying for self-build status. The Member further stated that their understanding was that the freeholder in this instance was Java Properties International Limited, based in Finchley Road, and requested that officers also seek clarification as to whether a company could qualify as a self-build applicant for the purposes of the legislation.

Having considered the application, the Committee **RESOLVED** to defer the decision for the following reason(s):

- To allow the ownership certificates relating to the application to be evaluated prior to determination and to clarify whether the scheme would fall within the definition of self-build.

7. Any Other Urgent Business

There was no other urgent business.

The meeting closed at 10:30 pm

COUNCILLOR S BUTT
Chair

APPLICATIONS FOR DECISION

Introduction

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

Material planning considerations

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

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

Provision of infrastructure

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

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

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

Further information

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

Public speaking

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

Recommendation

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

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COMMITTEE REPORT

Planning Committee on
Item No
Case Number

5 August, 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	<u>When viewing this on an Electronic Device</u> Please click on the link below to view ALL document associated to case https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=DCAPR_176340 <u>When viewing this as an Hard Copy _</u> Please use the following steps 1. Please go to pa.brent.gov.uk 2. Select Planning and conduct a search tying "26/0225" (i.e. Case Reference) into the search Box 3. Click on "View Documents" tab

INTRODUCTION

This application was presented to Planning Committee on 2 July 2026, with a recommendation to grant planning permission subject to the completion of a satisfactory Section 106 legal agreement. The majority of members voted against the recommendation to grant planning consent, with members indicating they were minded to refuse the application due to the following aspects of the proposal (not all issues were raised by all members who voted against the recommendation to grant permission):

1. Insufficient provision of affordable housing (3 members);
2. Insufficient parking provision on-site and the impact of congestion on surrounding streets (3 members);
3. Lack of community space (1 member);
4. Lack of on-site play space for older children (1 member);
5. Insufficient provision of family sized housing (2 members);
6. Harm to neighbouring amenity, including loss of daylight (1 member); and
7. Impact on non-designated heritage asset and character of the streetscene; (2 members).

A decision was taken by Members to defer a final decision to a future committee meeting to enable officers to provide a further report setting out an analysis, assessment and testing of the potential reasons for refusal cited above by Members.

Additional information and clarification is provided in relation to the above points. These aspects are discussed in detail below.

In summary, officers continue to recommend that the application is granted planning permission, subject to the completion of a satisfactory s106 agreement to secure the Heads of Terms set out in the main Committee report together with the recommended planning conditions. However, should members vote to refuse planning permission, the application would then be referable to the Mayor of London pursuant to the Mayor of London Order 2008, as amended.

1. Insufficient provision of affordable housing

Three members were minded to refuse the application due to the insufficient provision of affordable homes within the development.

National Policy

The National Planning Policy Framework (NPPF, 2024) paragraph 64 sets out that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site unless:

- a) Off-site provision or an appropriate financial contribution in lieu can be robustly justified; and
 - b) The agreed approach contributes to the objective of creating mixed and balanced communities.
- NPPF paragraph 66 sets out that planning policies and decisions should expect that the mix of affordable housing required meets identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures.

Regional Policy

London Plan Policy H4A sets out a “strategic target” for 50% of all new homes delivered across London to be genuinely affordable, with measures contained within that policy to achieve this aim. Paragraph 1) of H4A relates to the approach to this within individual planning applications, setting out that major developments (10 residential units or more) are required to provide affordable housing through the threshold approach.

The threshold approach to affordable housing is set out in London Plan policy H5. This establishes that schemes involving development of public sector land where the “gross residential development” is a minimum of 50% affordable housing may follow the “Fast Track Approach”, whereby a viability assessment does not need to be provided at application stage. In this case the amount of affordable housing proposed is below this threshold and the applicant is therefore required to follow the Viability Tested Route.

Policy H4F captures the Viability Tested route and sets out that detailed supporting viability evidence must be submitted with the application. Paragraph 1 sets out that the borough “should scrutinise the viability

information to ascertain the maximum level of affordable housing using the methodology and assumptions set out in this plan and the Affordable Housing and Viability SPD". It is set out within Paragraph 2 that viability tested schemes will be subject to an Early Stage Review if an agreed level of progress has not been made within 2 years of permission being granted, and a late stage review is triggered when 75 % of the units in a scheme are sold or let (or alternative periods agreed by the borough).

Policy H4G sets out that the viability assessments should be treated transparently and undertaken in line with the Mayor's Affordable Housing and Viability SPD.

Local Policy

Brent's Local Plan supports the above approach, and Policy BH5 sets a target of 70% of affordable homes being for Social Rent (SR) or London Affordable Rent (LAR) and the remaining 30% being for intermediate products which meet the definition of genuinely affordable housing including affordable rent with Local Housing Allowance limits and London Shared Ownership. It is important to note that this policy allows the low-cost rental accommodation as either Social Rent or London Affordable, and the policy therefore does not enable the council to specify which of these tenures are delivered. This is also the case for London Plan Policy H6.

Affordable housing within this proposal

The scheme presented to Members in July 2026 proposed on-site affordable housing. The proposed level of affordable housing was 11 affordable dwellings, with all homes to be provided at LAR level. This comprised of 3 x 1-bedroom, 4 x 2-bedroom and 4 x 3-bedroom dwellings, all located within block A. That offer 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) it did not qualify for the "Fast Track Approach" so this was viability tested. As specified within the main Committee report, this approach is in accordance with relevant policy.

The proposal is not eligible for the fast-track route and therefore was evaluated through the Viability Tested Route, in line with Policy H5 of the London Plan. As set out in detail within the main Committee report, following detailed viability testing the applicants made a without prejudice affordable housing offer of 10 LAR homes, which was subsequently increased to 11 LAR homes. The submitted viability appraisal was thoroughly tested and evaluated by viability consultants appointed by the Council and following the detailed analysis of the viability of the proposal, the expert opinion of the Council's consultants was that the proposed offer of 11 LAR homes represents the maximum reasonable amount of affordable housing that could be delivered. This would generate a viability deficit of -£191,110 when measured against the agreed Benchmark Land Value (BLV) (£2.61m), taking into account reasonable assumptions including assumptions for profit. This effectively means that the applicant is choosing to bear risk if they were to proceed under current market conditions.

All of the Affordable homes are proposed to be delivered as London Affordable Rent, with none of the homes proposed as Intermediate Housing (e.g. Shared Ownership). The proposal therefore does not provide 30% of the homes as Intermediate products. However, given the significant need for low-cost rented accommodation in the Borough such as London Affordable Rented homes, the over-provision of homes within this tenure is strongly supported by officers.

Following the Committee meeting in July 2026, and noting the concerns expressed by Members with the proposed level of affordable housing and family sized housing, a revised affordable housing offer has been proposed. This maintains the overall provision as 11 homes at London Affordable Rent but with one of the 1-bedroom dwellings converted into a family sized 3-bedroom affordable home on the ground floor of block A through changes to the location of the cycle storage facilities.

The revised affordable housing mix comprises of 2 x 1-bedroom, 4 x 2-bedroom and 5 x 3-bedroom dwellings. This revised affordable offer continues to equate to affordable housing provision of 10% by unit (11 of 108), but increases the offer to 11.7% by habitable room (40 of 341), overall. Almost half (45%) of the affordable homes proposed would be family-sized and delivered as low-cost tenure most closely aligned with Brent's identified housing needs.

As discussed above, detailed evidence has been scrutinised by industry experts acting on behalf of the council and this has established that the proposed development (including both the previous and the revised affordable housing offer) is compliant with the policies that have been set out. It has been clearly demonstrated through the Viability Tested Route (London Plan policy H5) that the proposed development

would deliver the maximum reasonable amount of affordable housing, and this has been confirmed by appointed viability consultants. In this case that agreed position was based on 11 LAR homes, so it follows that with the revised affordable housing offer would continue to deliver the maximum reasonable amount of affordable housing.

Early and late-stage reviews would be secured within a Section 106 Agreement to capture any additional affordable housing on-site and / or off site contributions towards affordable housing, in the event that viability improves over time post decision. This is fully compliant with adopted policy.

It should be noted once more 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.

There is no evidence to substantiate the refusal of the application based on the insufficient provision of Affordable Housing as it has been demonstrated through the consideration of technical information by industry leading experts acting on behalf of the council that the proposal would deliver the maximum reasonable amount of Affordable Housing in line with the relevant policies. Without such evidence, the Council is unlikely to be able to defend the refusal of planning permission at appeal on these grounds and is likely to be subject to the award of costs against the council for unreasonable behaviour.

Notwithstanding this, if Members are minded to refuse planning permission due to the insufficient provision of affordable housing, then a reason for refusal has been drafted as follows:

The proposal would fail to deliver the maximum level of affordable housing that is deliverable within the scheme and therefore would not make an appropriate contribution to identified local housing need within the Borough. This would be contrary to Policy BH5 of the Brent Local Plan 2019-2041, and Policies H4, H5 and H6 of the London Plan (2021).

2. Insufficient parking provision on-site and the impact of congestion on surrounding streets

Three members were minded to vote to refuse the application on the basis that the proposal made insufficient provision for off-street car parking and would result in an impact on the levels of parking and congestion in the surrounding streets.

National Policy

The NPPF (paragraph) 110 sets out that significant development should be focused on locations which are sustainable. The Framework goes on to set out that in assessing proposed developments, it should be ensured that, sustainable transport modes are prioritised and that impacts from the development on the transport network (in terms of capacity and congestion) can be effectively mitigated to an acceptable degree. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios (NPPF, paragraph 116).

The NPPF (paragraph 117) further sets out that development proposals should give priority first to pedestrian and cycle movements. As specified in the main Committee report, the scheme presented to Members in July 2026 does this through the provision of a new permissive route for pedestrians and active travel use, cycle parking and the limited levels of vehicle parking proposed on site.

Regional Policy

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 for all development in accessible locations well-connected by public transport, such as this site which has a PTAL 4 ('good').

Local Policy

Brent Local Plan policies BT1 and BT2 seek to prioritise active and sustainable travel over private motor vehicles and support car free development as being the starting point for all development proposals in places that are well connected by public transport, which the application site is.

Parking provision within this proposal and impact on congestion

The scheme presented to Members in July 2026 proposed twelve off-street parking spaces (incl. 3 designated Blue Badge spaces), which meets the minimum requirement for Blue Badge spaces and is well within the maximum parking standard of 54 parking spaces to serve the proposed development. A Car Parking Management Plan would be secured through condition, with details to be approved setting out how permits would be allocated, which would ensure that off-street spaces were allocated on a short-term basis rather than sold with homes. There are no minimum parking levels specified within the policy (aside from those relating to Blue Badge parking), but the potential for overspill parking must be considered. To mitigate the potential for increased parking pressure on roads in the locality, and to reduce congestion, a parking permit restriction (also known as a car-free agreement) was proposed to ensure future residents of the development would be prevented from obtaining parking permits for the Controlled Parking Zone (CPZ) and Wembley Stadium Event Day zone that operate on roads surrounding the site. Blue Badge holders residing in the development would not, however, be subject to any 'car 'free' agreement and would remain eligible for on-street parking permits.

A parking permit restriction does not prevent one from owning a car. However, where residents are not able to park near to their property, this has been proven to be an effective means to mitigate the potential impacts of over-spill parking from a development. Such restrictions are implemented in areas that benefit from good public transport accessibility, with travel plans and active travel measures secured for the associated developments. This ensures that the new homes that are required in Brent (current target of 2,325 homes per annum, and proposed to increase to 2,532 per annum) can be delivered while mitigating the potential impacts of parking and congestion that would otherwise occur. It should be noted that the vast majority of the homes within the borough are not subject to parking permit restrictions, with the parking permit restrictions relating to new developments.

Following the July Committee meeting, the applicant has proposed minor site layout changes which result in the provision of one additional on-site parking space, taking the total provision to 13 spaces. The additional parking space is not required to ensure that overspill parking does not occur (as this is mitigated through the parking permit restriction that would be secured). However, it does represent an increase that is in direct response to Members' parking concerns with, and this increase can be supported when balanced against the policy requirements set out above to move towards more sustainable modes of travel and for car-free development to be the starting point for all development in accessible locations.

A reason for refusal of planning consent must be contrary to a policy and result in identified harm. The proposal is in line with adopted London Plan policy T6.1, meeting minimum requirements for blue badge parking and being below the maximum parking standards. The site is in an accessible location with good access to public transport options, where Brent policy BT2 sets out that car-free development should be the starting point. With only 13 car parking spaces proposed on-site, the development would not be expected to lead to unacceptable congestion on the road network generally from trip generation and technical information to support this has been submitted to the council and reviewed by the Council's own experts. To address the potential for increased parking demand on surrounding roads (and associated congestion), a parking permit restriction will be secured which is in accordance with Brent policy BT2 (b). A Car Park Management Plan would be secured through condition to ensure that car parking spaces are leased rather than sold which is a requirement of London Plan Policy T6.1 (B).

As such, the proposal is not contrary to the planning policies which relate to parking and congestion and would not result in material harm in relation to parking and congestion. The Council is unlikely to be able to defend the refusal of planning permission on these grounds and at appeal would likely to be subject to the award of costs against the council for unreasonable behaviour.

Notwithstanding the above, if Members are minded to refuse permission due to the insufficient provision of parking and the impacts of the development on congestion on the local streets then a draft reason for refusal is as follows:

The proposed development fails to provide an adequate level of on-site parking and insufficient evidence has been submitted to demonstrate that the resulting parking demand would not lead to overspill parking stress and congestion on surrounding streets. This would be to the detriment of the safe and efficient operation of the highway network, contrary to policies T6 and T6.1 of the London Plan (2021) and policies BT1 and BT2 of the Brent Local Plan.

3. Lack of community space

One member was minded to vote to refuse the application on the basis that the proposal did not include the

provision of any community space for future residents.

The policy position set out in the London Plan (policy S1) and the Local Plan (policy BSI1) in relation to social infrastructure essentially seeks to protect and retain existing infrastructure, unless it is shown that this is redundant and that there is no demand for other suitable forms of community use. This matter has been addressed in detail within paragraphs 13 – 31 of the main Committee report, where it is set out that the open market disposal exercise undertaken prior to the NHS disposing of the site, attracted interest predominantly for residential redevelopment, with no substantive interest progressing from alternative community or social infrastructure operators. The loss of the existing social infrastructure (which is healthcare related) has been duly considered in the overall planning balance.

Policy BP7 (South West) specifies that proposals should plan positively to deliver the place vision by contributing and where appropriate, delivering the following: ...m) Meeting social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health and community facilities.

The site allocation policy (BSWSA 13) which relates to the wider development of the Wembley Police Station and Fire Stations and the Wembley Community Hospital / Chaplin Road Health Centre refers to the potential uses within the site including “Existing police, fire and health facilities retained/reconfigured, opportunities for other community uses considered and residential on any surplus land, for provision of on-site community space to support the redevelopment of this allocated site for residential use”.

It is not feasible to provide community uses on all sites, with larger developments better suited to enable the delivery of such facilities. A new community facility is being delivered with Brent Wembley Housing Zone development on the corner of the Wembley High Road and Cecil Avenue.

Acknowledging the concern raised by Members it is proposed that the scope of the s106 Heads of Terms be broadened, so that the play space contribution of £50,000 could also be utilised for enhancements to nearby existing community facilities, if that was deemed a more appropriate use for the contribution at the relevant time.

The proposal is not considered to be contrary to adopted policy in relation to the provision of community facilities, nor is it considered that the proposal will result in material harm, and with no specific requirement for the provision of a community facility within this site, the council is unlikely to be able to defend a reason for refusal on this basis and at appeal may result in the award of costs for unreasonable behaviour.

Nevertheless, should members choose to refuse permission on this basis, a draft reason for refusal is as follows:

The proposed development, by reason of the absence of community facilities, would fail to meet social infrastructure requirements by securing provision for needs arising from the development in relation to the provision of community facilities. This would be contrary to Policy BP7 of the Brent Local Plan.

4. Lack of on-site play space for older children

One member was minded to vote to refuse the application on the basis that the development made insufficient provision for play and recreational space for older children.

Regional Policy

London Plan policy S4 sets out that development proposals likely to be used by children and young people should increase opportunities for play and informal recreation. For residential developments at least 10sqm of play space should be provided per child, which should include appropriate provision for different age groups, including older children and teenagers. The Mayor's Play and Informal Recreation SPG provides more detailed guidance.

On-site play provision for older children within the proposal

The main Committee report sets out that the quantum of on-site play provision proposed for age groups 0-4 years and 5-11 years, is fully in accordance with the above-mentioned policy and SPG. The play shortfall identified is in relation to the older (12+) age group as the expected child yield for the proposed development equates to a requirement for 100sqm of play provision on-site for this age group, and the scheme presented to Members did not include any on-site play space for this older group. To help mitigate this shortfall it was

reported to Members that a contribution of £50,000 has been agreed with the applicant to be directed towards improvements to nearby open spaces.

Following the July Committee meeting the scheme and further consideration of the concerns Members raised the proposals have been amended to now include some on-site play features and informal recreation provision for the 12+ age group. This comprises an area of c.36sqm, located towards the western boundary of the site, integrated within the communal courtyard area. This would provide two table-tennis tables and a covered seating area for social interaction. Whilst there is still a shortfall against the 100sqm requirement the proposed introduction of these features is a betterment. It will provide the opportunity for those in the 12+ age group to take part in play and informal recreation on-site, and this revision is supported.

For the avoidance of doubt, the agreed play space contribution of £50,000 which could go towards improvements to nearby open space is still required to mitigate the remaining shortfall on-site. As discussed above, it is now proposed to widen this contribution to also include the potential use for community facilities (at the Council's discretion), which while potentially not providing outdoor play and recreation, could also assist the provision of youth facilities by enabling improvement or provision of community facilities.

Considering the improved on-site play offer proposed and the remaining reduced shortfall for the 12+ age group that would be experienced by future occupiers, alongside the mitigation to be secured through the Heads of Terms, Officers remain of the view, that on balance, the play strategy is considered to be acceptable.

In view of the mitigation that has been agreed by the applicant, which as referred to above is to provide a contribution of £50,000 to address the identified deficiency in play space provision, Officers do not consider there to be reasonable grounds for refusal based upon lack of on-site play space for older children, which could be successfully defended at appeal.

Notwithstanding the above, if Members are minded to refuse permission due to the insufficient provision of play and recreational facilities, a draft reason for refusal is as follows:

The proposal would fail to provide an adequate quantity of on-site play space for children aged 12 years and over, resulting in an identified shortfall. The lack of sufficient on-site play and informal recreation would fail to adequately meet the needs of future occupiers, particularly older children. In the absence of sufficient on-site provision, the proposal would be contrary to policies S4 and D6 of the London Plan (2021) and policy BH13 of the Brent Local Plan.

5. Insufficient provision of family sized housing

Two members were minded to vote to refuse permission on the basis that there would be an insufficient provision of family sized homes (3 or more bedrooms).

National Policy

Chapter 5 of the NPPF sets out that in delivering a supply of homes, 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.

Regional Policy

Policy H10 sets out that in order to determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, regard should be had to local evidence of need and the need for additional family housing.

Local Policy

As set out in policy BH6, the Council will seek to deliver a target of 25% of new homes as family-sized (3 bedrooms or more) dwellings. This means that for every four dwellings included within the development, at least one must have 3 or more bedrooms.

Family sized housing provision within the proposal

The scheme presented to Members in July 2026 proposed that 26 of the 108 dwellings would be family sized (with at least 3 bedrooms). It was acknowledged in the main Committee report that this would represent a marginal shortfall (1 home) below the Local Plan BH6 policy target of 1 in 4 new homes to be family sized.

Notwithstanding this marginal shortfall the development, it was considered that the proposal would provide a meaningful contribution of much needed family sized homes (including family sized affordable homes). For these reasons, the proposed development was considered acceptable in respect of family sized housing provision.

Following the July Committee meeting the applicant has proposed an increase in family sized housing provision to directly address Members' concerns. An additional family sized 3-bedroom dwelling is proposed at ground floor level within block A, by converting a 1-bedroom affordable dwelling into a 3-bedroom affordable dwelling through the relocation of a bicycle store, which will result in the overall provision of family homes being 27 of the 108, meeting the 1 in 4 policy target. As referenced above, almost half of the affordable homes (45%) would now be family sized also, which is positive given the significant need for family sized affordable homes. The increased level of family housing proposed is fully in accordance with Local Plan policy BH6. As such, officers do not consider there to be any reasonable grounds to refuse the application owing to the provision of family housing proposed.

6. Harm to neighbouring amenity due to the loss of daylight

Following discussion of the item at the July Committee, one member was minded to vote to refuse permission on the basis that the proposed development would result in harm to neighbouring amenity, including loss of daylight to a side facing window of 15 Fairview Avenue.

The application submission identified that there would be a degree of harm to neighbouring amenity, including the amenity of 15 Fairview Avenue, in relation to loss of privacy, loss of outlook, reduced daylight and sunlight conditions and overshadowing and this was discussed in the committee report. The report also sets out that where amenity harm has been identified this is isolated to one part of the site, and so the magnitude of identified harm (and number of sensitive receptors) is limited. In relation to the side facing kitchen window of No. 15, a reduction in Vertical Sky Component to 61 % of its former value was identified. In relation to the No Sky Line assessment, the reduction was to 73 % of its former value. The BRE guidance (as discussed in the committee report) identifies that a reduction to less than 80 % of the former value is noticeable. In the scheme presented to Members, the harmful amenity effects identified were balanced against the planning benefits overall and found to be outweighed by the range of benefits the proposed development would deliver.

Policy context

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 minimising overshadowing.

Policy D3 of the London Plan states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites.

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.

The Building Research Establishment guidance "Site Layout Planning for Daylight and Sunlight" is commonly applied in the assessment of the impact of development on nearby receptors, with details of the tests within the guidance contained within the committee report.

Harm to neighbouring amenity resulting from the proposal through the loss of daylight to the wide window of 15 Fairview Avenue

Following the July Committee meeting the applicant has sought to further demonstrate the relationship between the proposed townhouses, namely unit 101, and 15 Fairview Avenue, in response to Members' concerns that the proposal would cause harm to neighbouring amenity. An illustrative section analysis of this proposed relationship has been provided which shows that the boundary fence provides a degree of screening to the existing kitchen (side facing) window to 15 Fairview Avenue. It shows that the first floor and second floor windows of the proposed home that are directly opposite the kitchen window of No. 15 are bathroom windows and would be obscure glazed (which can be secured by condition), and that the bedroom windows of the new houses would be at an angle to the kitchen window. The illustrative plan shows the smaller pane of each bedroom window is to be obscurely glazed which would further reduce the overlooking

and loss of privacy (again this can be secured by condition). The same obscure glazing strategy is also proposed to the rear façade of unit 100.

One member was minded to vote to refuse permission due to the impact of the proposal on the light received by the kitchen window of No. 15. As discussed above, the proposal will have an impact on the amount of daylight that is received within the kitchen of No. 15, and that impact will be noticeable. However, the No Sky Line assessment shows that the levels of reduction are 6 % beyond the threshold set out within the BRE guidance.

While the impacts are acknowledged, it is considered that they are considerably outweighed by the benefits of the development that are set out within paragraphs 358-373 of the committee report and include the provision of a significant number of new homes, with one in four of those homes being family sized and 11 of the homes being proposed as affordable homes.

Notwithstanding the above, if Members are minded to refuse permission, a draft reason for refusal is as follows:

The proposed development, by reason of its siting and proximity to the side facing kitchen window of 15 Fairview Avenue would result in an unacceptable impact on the living conditions of occupiers of this property. The proposal would result in undue loss of privacy through overlooking as well as a harmful reduction in daylight received by this neighbouring property. The proposal therefore fails to maintain a satisfactory standard of residential amenity for neighbouring properties, contrary to policies D3 and D6 of the London Plan (2021), policy DMP1 of the Brent's Local Plan and the guidance set out in Brent's SPD1.

7. Impact on non-designated heritage asset and character to the streetscene

Two members were minded to vote to refuse the application on the basis of the heritage impact resulting from loss of the existing buildings, which are recognised as being a non-designated heritage asset (NDHA), and also that the proposal does not relate to the existing streetscene character.

Firstly, in terms of heritage effects, as set out in the main Committee report (paragraphs 83–107), due regard has been had to the impact the loss of a NDHA would have on the historic environment.

Policy Context

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.

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.”

Impact on Non-Designated Heritage Asset (NDHA)

The existing buildings (proposed for demolition) are not statutory listed, and as set out in the submitted Heritage Statement the proposed development would not impact on the setting of the closest listed heritage assets.

The significance of the NDHA has been duly considered in the main Committee report, where it is noted that significant change over time has seen any historic significance reduced.

Any historic association with the Barham Family, who originally donated the land to build the Old Wembley Hospital or the Copland Sisters, who funded the establishment of the hospital through the Copland Charity, is not legible when one views the site. The Council's Heritage Officer has judged that these historic associations on their own do not represent an element of heritage significance special enough to justify retention.

In line with paragraph 218 of the NPPF, a Level 2 Building Recording has been undertaken, which provides a

historic building recording (both written and visual). The scope of this recording has been agreed by the Council's Heritage Officer, and is considered proportionate, allowing for a photographic and descriptive record of the site to be properly documented for the future. The recording survey undertaken can be added to the Council's Historic Environment Record.

In summary, 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 that the lost buildings, which played an important role in the area's history, are recorded. This has been done in part through the agreed Level 2 Building Recording and a condition 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).

Impact on the character of the streetscene

The prevailing residential character to the south and east of the site is that of two/three-storey homes, with some 3-4 storey flatted blocks situated to the north. To the west and north-west of the site character changes significantly and the scale of existing civic buildings display a marked increase in height. At a maximum of 6 storeys in the north-western part of the site, the proposed development would be comparable in both height and massing to the existing taller buildings within the surrounding context. The site wide massing strategy responds well to the surrounding context by stepping down in height across the site, from west to east, with a gradual stepping down in height from six, to five and three storeys. The three-storey elements of the development have been intentionally located along the eastern part of the site, and these townhouses respond appropriately to the scale of existing two-storey residential properties on Fairview Avenue, Chaplin Road and Harley Close.

The scale, design and materiality of the terrace of three houses, fronting Chaplin Road, fit in well to the established streetscene.

Where building heights then step up to four/five/six-storeys, in terms of scale, this responds appropriately to the larger civic buildings. In terms of character, the proposed multi-tonal bricks are reflective of the surrounding residential context. Facades are broken down and well-articulated, including the feature brickwork detailing. Architectural inspiration for the scheme has been derived from the surrounding Metroland context, as well as the listed Wembley Fire Station, located nearby, built in an art-deco style. This inspiration is clear to see across the proposed scheme, and demonstrates the level of regard that has been had to the surrounding context.

In summary, the character of the proposed development represents a considered and appropriate response to the surrounding context. Officers consider the overall approach in terms of design and appearance to be appropriate in light of the site's specific characteristics, and in design terms the requirements of Local Plan policy BD1 are satisfied.

Nevertheless, if, having regard to the discussion above, the Planning Committee are minded to refuse the application due to the concerns raised, then a draft reason for refusal is as follows:

The proposed development by reason of the demolition and loss of the existing non-designated heritage asset and the form, appearance and character of the proposed development would fail to preserve or appropriately respond to the significance of the heritage asset, resulting in heritage harm to Brent's historic environment. Furthermore, the proposed development would fail to respect the prevailing character of development in the area, resulting in harm. The proposal therefore conflicts with policies HC1 and D3 of the London Plan (2021), policies BD1 and BHC1 of the Local Plan, and heritage and design objectives of the National Planning Policy Framework (2024), which seek to conserve heritage assets and secure high-quality design that responds positively to local character and context.

Failure to secure a legal agreement

In the event that Planning Committee are minded to refuse the application, an additional reason for refusal would need to be included in relation to the absence of a Section 106 legal agreement to secure the matters set out within the Heads of Terms. This would be as follows:

In the absence of a legal agreement to control such matters, the development would not secure:

- *Sustainability measures;*
- *Job and training opportunities for local residents;*
- *Permissive pathway and management plan;*

- *Biodiversity Net Gain monitoring contribution and Habitat Management and Maintenance Plan;*
- *Necessary pedestrian environment improvement works;*
- *A travel plan;*
- *Necessary contributions towards improvements to nearby open spaces, and healthy street improvements.*

As a result, the proposal would fail to comply with policies S4, E11, G6, SI1, SI2, T2 and T4 of London Plan 2021, policies BH13, BE1, BGI2, BSUI1, BSUI2 BT1 and BT2 of Brent's Local Plan and the guidance contained within Brent's S106 Planning Obligations SPD (2013).

Other revisions proposed / scheme updates following July Committee

Amendments to cycle parking

To facilitate provision of the additional 3-bedroom dwelling discussed above, in block A, an internal cycle store has been relocated. This cycle parking is now proposed to be provided as an external cycle store, located to the west of block A, which is an acceptable alternative arrangement. Further details of the store are to be secured through condition (see below).

Play provision

The revised unit mix, with the added 3-bedroom dwelling, has resulted in a marginal increase to the required level of on-site play provision of 0–11-year-olds, from 409sqm to 420sqm and for the 12+ age group, from 100sqm to 105sqm. For the 0–11-year-olds this has been addressed with additional play within the central courtyard. For the 12+ age group there is still a deficit (albeit a reduced one), which is to be mitigated by the play space contribution, secured in the s106 agreement.

Biodiversity Net Gain

Changes made to the landscape strategy result in a marginal improvement to BNG. It was previously reported there would be a BNG uplift (net gain) of 11.74% compared to the existing baseline. This uplift is now calculated to be 12.82%, which is a positive improvement. It is set out in the updated Biodiversity Net Gain Assessment (1049.BNG.Final.03) and accompanying Metric how this is to be achieved.

Proposed amendments to planning obligations

As referred to above, it is proposed to broaden the scope of the play space contribution (£50,000) so that it can also go towards nearby existing community facilities, to meet the needs of the older children's age group (12+) given the identified shortfall, as set out above.

Proposed amendments to planning conditions following July 2026 Committee

Condition 34 has been amended to ensure the submitted Car Parking Management Plan also confirms details of car parking space lease arrangements. The updated condition wording is proposed as follows:

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:

- *details to confirm only Blue Badge holders will be allocated permits for accessible parking bays;*
- *how demand for accessible parking bays will be kept under review;*
- *the process for allocation of permits and the duration of the permit details confirming parking space lease arrangements (including duration of any lease, licence or other comparable arrangement which for the avoidance of doubt shall be on a short-term basis and not sold / leased with individual homes), how the parking provision is to be allocated and how the allocation of spaces / permits will be managed;*
- *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.

Condition 28 Landscaping has been amended to include a specific requirement for further details to be

agreed of the pergola / canopy-type structure to be located adjacent to the table tennis tables, as well as further details of the design and appearance of the external cycle store located along the western boundary.

Other conditions, including Condition 2 (approved plans), will also need to be updated where relevant to reflect revisions to plan numbers and updated supporting documents.

Further representations received following July Committee

None

Equalities

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). An analysis of equalities impact has been provided within the main committee report.

Recommendation: Officers continue to recommend that permission is granted subject to the completion of a legal agreement to secure the planning obligations and conditions set out above and within the main Committee report (which is set out below).

However, should members vote to refuse planning permission, the application would then be referable to the Mayor of London under the provisions of the Mayor of London Order 2008, as amended.

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

 Brent	Planning Committee Map
Site address: Brent NHS Primary Care Trust, Wembley Centre For Health & Care, 116 Chaplin Road, Wembley, HA0 4UZ	
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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.

Representation Comments	Officer Remarks
Principle of development / uses	
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.
Overbearing scale of development and harmful impact on character on surrounding area	
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

	dwellings. 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. 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.
Amenity:	
Loss of daylight, sunlight and privacy to neighbouring properties	Effects of the proposed development to surrounding properties has been considered holistically against BRE guidelines, relevant policies and SPD1. This is considered in detail within the 'Relationship with neighbouring sites and assessment of amenity impacts' section of the report.
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.	For the purposes of assessing this proposal and the impacts on this window the window has been treated as a habitable window. 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. 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.
Applicants use of the mirrored is inappropriate in the low-density context.	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 / APSH 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.
Daylight impacts on first floor bathroom of 15 Fairview Avenue.	Reductions to this room are noted, however, bathrooms are considered non-habitable under BRE guidance.
Impact on living room flank wall windows.	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

	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.
Infrastructure	
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.
Transport	

There is insufficient parking and residents will park on nearby roads outside of CPZ hours.	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. 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. Please refer to the 'Transport and access' section of the report for further details.
Will lead to increased congestion on roads in the area.	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.
Construction vehicles should access the site via Chaplin Road and not Fairview Avenue.	Such an arrangement would not be practical, as discussed in the 'Transport and access' section of the report.
Further clarification requested in relation to construction delivery times.	Refer to the 'Transport and access' section of the report.
Flooding / drainage	
Location of proposed wheel-washing facility for use during construction will lead to localised surface water flows on Fairview Avenue.	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.
Landscaping	
Inadequate provision of trees on site	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.
Environmental health considerations	
Harmful noise impacts during demolition and construction periods.	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. Refer to Environmental health section of the report for further details.

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.
Other	
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
 BS11: 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
Total	108	100	322	100

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.

	Fairview New Homes Original Viability Submission	Fairview New Homes Updated Viability Submission
Residual Land Value	£2,120,515	£2,857,102
Agreed Benchmark Land Value	£2,618,000	£2,618,000
Surplus / Deficit	-£497,485	£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 21st 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 21st 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 21st 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 21st 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 21st 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 21st 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;

	Policy target	Be Lean	Be Clean	Be Green	Proposed
Energy					

% 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;

Storm return period	Existing runoff (l/s)	Proposed runoff (l/s)	Betterment (%)
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 BGI1 (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 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 BG12.
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 four 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.

DRAFT DECISION NOTICE



Brent

DRAFT NOTICE

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

DECISION NOTICE – APPROVAL

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: 28/07/2026

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 P02
3628-STO-XX-XX-PL-A-20001 P02
3628-STO-XX-XX-PL-A-20002 P02
3628-STO-XX-XX-PL-A-20003 P02
3628-STO-ZZ-00-PL-A-20100 P03
3628-STO-ZZ-01-PL-A-20101 P03
3628-STO-ZZ-02-PL-A-20102 P03
3628-STO-ZZ-03-PL-A-20103 P03
3628-STO-ZZ-04-PL-A-20104 P03
3628-STO-ZZ-05-PL-A-20105 P03
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 P01
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 P02
3628-STO-ZZ-EX-PL-A-20202 P01 (July 2026)
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 P19
24.037-BOSK-XX-ZZ-DR-L-1001 P06

Trees Survey and Protection Plans

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

Phasing Plan

3628-STO-ZZ-RF-PL-A-20106 P02

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, July 2026
Biodiversity Net Gain Metric by Red Ecology, July 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 SI1 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 SI1 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 (including the design and appearance of any means of enclosure), play features, pergola / canopy 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

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.

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-your-development/working-near-our-pipes__;!!CVb4j_0G!T6NC5eyXTZ5yLsj4!td7w-AcYfFUMflCqbkzi4-huYcdolZHm3cLPtZwbOILcKdliWrJhapQ9p0uYvC8oxJ3aQOnl84IbLU\\$](https://urldefense.com/v3/__https://www.thameswater.co.uk/developers/larger-scaleddevelopments/planning-your-development/working-near-our-pipes__;!!CVb4j_0G!T6NC5eyXTZ5yLsj4!td7w-AcYfFUMflCqbkzi4-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.

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

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