

COMMITTEE REPORT

Planning Committee on
Item No
Case Number

11 February, 2026
04
25/0041

SITE INFORMATION

RECEIVED	7 January, 2025
WARD	Queens Park
PLANNING AREA	Brent Connects Harlesden
LOCATION	Little Trainers Playgroup and Hazel Road Community Centre, 26 Hazel Road and Harriet Tubman House, 28 Hazel Road, London, NW10 5PP
PROPOSAL	Demolition of all existing buildings and structures and erection of 4 storey mixed-use building comprising of training centre and community hall uses (Use Classes F1/F2), with roof and rear first floor terraces, associated cycle parking, refuse storage, landscaping and all other associated and ancillary works.
PLAN NO'S	See condition 2
LINK TO DOCUMENTS ASSOCIATED WITH THIS PLANNING APPLICATION	<p><u>When viewing this on an Electronic Device</u></p> <p>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_171575</p> <p><u>When viewing this as a Hard Copy</u> .</p> <p>Please use the following steps</p> <ol style="list-style-type: none">1. Please go to pa.brent.gov.uk2. Select Planning and conduct a search tying "25/0041" (i.e. Case Reference) into the search Box3. Click on "View Documents" tab

RECOMMENDATIONS

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

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

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

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

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

Informatives

As set out within decision notice.

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

SITE MAP

**Brent**

Planning Committee Map

Site address: Little Trainers Playgroup and Hazel Road Community Centre, 26 Hazel Road and Harriet Tubman House, 28 Hazel Road, London, NW10 5PP

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This map is indicative only.

PROPOSAL IN DETAIL

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

EXISTING

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

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

AMENDMENTS SINCE SUBMISSION

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

SUMMARY OF KEY ISSUES

Summary of key issues

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

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

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

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

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

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

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

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

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

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

RELEVANT SITE HISTORY

None

CONSULTATIONS

Public consultation responses

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

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

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

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

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

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

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

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

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

The representations in support of the application state the following:

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

External Consultation

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

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

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

Cadent gas – No objection.

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

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

Internal consultee responses

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

POLICY CONSIDERATIONS

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

The development plan is comprised of the:

London Plan 2021
Brent Local Plan 2019-2041

Key policies of the London Plan include:

D3: Optimising site capacity through the design-led approach
D12b: Fire Safety
D4: Delivering good design
D5: Inclusive design
D12: Fire Safety
S1: Developing London's Social Infrastructure
HC1: Heritage conservation and growth
G5: Urban greening
G7: Trees and woodlands
S11: Improving air Quality
SI 2: Minimising greenhouse gas emissions
SI 13: Sustainable drainage
T5: Cycling
T6: Car parking

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

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

Other material considerations include:

National Planning Policy Framework
National Planning Practice Guidance

Supplementary Planning Documents

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

DETAILED CONSIDERATIONS

Principle of development (Land Use)

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

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

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

2. Policy BS11 of the local plan states that for proposals for new or enhanced social infrastructure facilities, including the consolidation of existing facilities, will be supported by the Council where:

e) *easily accessible by public transport, walking and cycling, preferably in town centres or Growth Areas;*

3. In relation to part 'e', while the site is in a PTAL 3 zone which indicates a moderate public transport accessibility, it is located close to Kensal Green London overground and underground station and several bus stops and routes along Harrow Road. In this instance, it is considered that the location for the intensified use is acceptable.

f) *located within the community they are intended to serve;*

4. The existing community use has existed for a period of more than 20 years in this location, where they work with local residents. This is a part of the borough which experiences high levels of deprivation and inequality and associated negative social impacts. The charity works to improve the life chances of those impacted by deprivation and inequality and is therefore well placed to meet local needs.

g) *provided in flexible and adaptable buildings;*

5. The existing building is proposed to be redeveloped due to its lack of flexibility. The new building comprising timber load bearing as opposed to brick will be a vast improvement over the existing layout, allowing for open plan arrangements with partitions which can be easily removed to provide for alternative layouts. The space can therefore provide for a range of activities to take place, ensuring that the changing needs of the local residents and community organisations are met going forward.

h) *ideally co-located with other social infrastructure uses;*

6. The building is designed to reflect changing operational requirements. The scheme would contain a new community hall located on the ground floor of the proposed development with its own separate entrance from the main Making the Leap entrance. Whilst the floorspace of the new community centre would be less than existing, the spaces within the main building would also be available to book/hire by the local community such as the use of the training room or IT room, the social hub and the third floor social hub and roof terrace. This includes the needs of Making the Leap but also providing more good quality space for other community groups who will be given access to the building. The space will therefore operate as a local hub for community activity and will not be the sole preserve of one user which is welcomed and supported by this policy requirement.

i) *maximising wider community benefit, through if necessary, requiring formal community use agreements.*

7. As identified above, Making the Leap use their existing premises flexibly, including as part of their business model renting their spaces out to other community groups. The organisation is therefore actively ensuring the space is utilised effectively for a range of community uses. However, Making the Leap has also agreed to capture this through a Community Use Agreement (CUA) to be secured by condition. This gives greater certainty that such opportunities will endure and are not dependent on an ethos/ model that could be subject to change, either by Making the Leap or any other principal occupier of the premises in the future.

Summary

8. The redevelopment of the site is supported in principle in land use terms and would be compliant with policy BS11 of the Local Plan. It will result in an expanded and improved community offer which is more flexible and adaptable to meet the on-going needs of local residents.

Demolition of Existing Building and heritage impact

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

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

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

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

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

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

12. Paragraph 208 of the NPPF states that:

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

13. Paragraph 218 of the NPPF states that:

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

14. Paragraph 207 of the NPPF highlights that when determining application, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.

15. Paragraph 216 of the NPPF highlights that the effect of an application on the significance of a non-designated heritage asset should be considered in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

16. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. Regarding listed buildings, all planning decisions should "have

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

Significance of the non-designated heritage asset

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

'Both the exterior and the interior of the building have been altered over time, but it retains some architectural interest for its late 19th century high Victorian appearance, with alternating brick patterns, gothic style window openings and gables. It also has some historic interest as a mission hall. The degree of architectural and historic interest that can be attributed to the building is limited by the numerous changes and additions over the years. Detracting elements include the unsympathetic rendered gables and east elevation. The metal plates fixed to the elevations also reduce its architectural coherency. The late 20th century extension to the west is an unsympathetic feature and blurs any significance that the plan form of the building may be considered to have, further detracting from the architectural interest of the building. The building's setting is generally poor.'
21. The revised heritage statement has used Brent's formula for assessing the significance of buildings for its local list. The revised heritage statement concludes that the building would have a low-medium significance, due to its:
 - "Altered gables and rendered east elevation.
 - Disruptive later extension (early 2000s).
 - Lack of original architectural detailing internally.
 - Questionable associative significance (e.g., QPR link not manifested physically)."
22. It also recognises that the building may contain some modest local historic and communal value, obtained from its former use.
23. The criteria Brent Council uses to assess the suitability of buildings for addition to the LB Brent local list has circumstantial shortcomings. This is not to say that the criteria are not fit for their intended purpose.

The heritage statement writes:

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

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

“The degree of architectural and historic interest that can be attributed to the building is limited by the numerous changes and additions over the years. Detracting elements include the unsympathetic rendered gables and east elevation. The metal plates fixed to the elevations also reduce its architectural coherency. The late 20th century extension to the west is an unsympathetic feature and blurs any significance that the plan form of the building may be considered to have, further detracting from the architectural interest of the building. The building's setting is generally poor. However, the building is still recognisable as a small hall and, although the alterations to the building have all had an adverse effect on it, this does not affect the ability to appreciate the significance of the building. The building may also be considered to possess some local historic and communal value.”
28. Officer have considered the representations relating to the historic significance from both the applicant and the WLHS together with their own views of the historic significance. It is considered that, while the site building has some features of architectural interest and some historical associations of note, it has not reached the required threshold for local listing. This is shown by the fact the site building has not been placed onto the list previously, despite consideration. It can also be evidenced by several exercises.
29. Firstly, an exercise in comparison is of use. If a comparison is made between the site building and other religious buildings and community spaces on LB Brent's local list of heritage assets, it underlines its modest level of heritage significance. There are several religious buildings on the list that are of an obviously higher level of architectural interest, historical/archaeological interest, townscape importance, and authenticity. These include the Church of St Catherine (which scored 8 out of 12), West Kilburn Baptist Church (11/12), 17 Heathfield Park (7/12), Shree Swaminarayan Temple (11/12), Wembley United Synagogue (9/12), the Iman Khloel Islamic Centre (11/12).
30. After studying the sites buildings, alongside the evidence provided by both the applicants and objectors, Brent's heritage officer also gone through the exercise of re-assessing the significance of the site building using the local list criteria. The table establishes the process used to arrive at their conclusion.

Local List Eligibility Assessment		
Category	Commentary	Score

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

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

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

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

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

Design, visual appearance and impact on street scene character

Policy background

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

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

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

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

Scale bulk and massing

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

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

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

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

Materiality and secure design

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

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

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

Impact on neighbouring amenities

Daylight and sunlight impact and overshadowing

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

23-25 Hazel Road - residential

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

27 Hazel Road - residential

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

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

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

29 Hazel Road- religious property

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

31 Hazel Road- residential

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

Summary

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

Privacy/overlooking impact and noise impact

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

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

Overbearing impact and increased sense of enclosure

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

Transport considerations

Parking

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

Parking survey

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

79. Appendix F provides parking survey data for Wednesday evening (8pm) and Sunday morning (9.30am), which is when the centre is expected to be at its busiest. The survey indicates that College Road and Mortimer Road are heavily parked on both days, with Felixstowe Road also heavily parked on Sunday morning. Hazel Road and other nearby streets do have a lower parking stress below 80% though, so some spare on-street parking capacity is available to accommodate parking from the centre during its busiest times. With the travel survey indicating that very few visitors travel by car, the proposal is not considered to result in a detrimental impact on parking or highway conditions on surrounding streets.
80. The objections received to this application from local residents do suggest that streets in the area do suffer from high parking pressures. However, none of the objections provide evidence to demonstrate that the centre currently contributes to the excessive parking pressures on these streets.
81. The proposal is therefore considered acceptable in parking terms.

Cycle parking

82. Section 8.3 of the TS states that two Sheffield stands will be provided for 4 bikes and 9 two-tier stands will be provided for 18 long-stay spaces.
83. Drawing 01AP0010100-P01 proposes a cycle store on the ground floor, accessed via double doors on the western edge of the building. The store will accommodate both long-stay and short-stay spaces. This door should be automated and at least 1.2m wide to allow ease of passage for the cycles. Internal doors leading to the cycle store should also be automated and 1.2m wide for access. A detailed drawing of the cycle store should be provided to ensure the spaces can be accommodated. This would be secured by condition.

Servicing

84. Section 6.50 of the Transport Statement states that an uplift of 1-2 deliveries per day is expected to be generated. The deliveries are expected to occur from Hazel Road along the double yellow lines, as per the existing arrangements. The Transport Statement states that the uplift in servicing is minor. However, a delivery and servicing management plan is sought to ensure that vehicles do not unduly obstruct the highway- this will be secured by condition.
85. Private waste collection would need to be arranged for the site and the collection will occur from the Highway, as per existing arrangements. The Eurobins will be stored near the Highway, which will allow straightforward collection.

Travel Plan

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

Construction Logistics Plan (CLP)

87. Page 16 of the CLP proposes a site layout plan. The applicant proposes to utilise park land (approx. 15m wide and 20m deep) on the eastern edge of the site to allow HGVs to access the site off street. This will result in the loss of trees and parks land for the duration of construction, and these would need to be replanted.
88. It will also result in the temporary closure of the footpath leading to Hazel Road open space- Brent's Parks Department have been consulted and they advise that the proposal should mitigate the risks of loading on the railway tunnel are not increased; and also that any liability in that respect, either during the works, or as a result of the works at a later date, would be covered. Then there would be the details of

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

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

Energy and sustainable design

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

99. The strategy, included within the Sustainability Statement required by BSUI1, demonstrates an overall reduction of 37%, including a 17% reduction via energy efficiency measures alone. The remaining reductions are achieved through 'green' measures, including the use of PV solar and Air Source Heat Pumps for heating and hot water. To achieve net zero, the remaining emissions will be accounted for via an offset payment of £7,849. The proposal also identifies and seeks to reduce unregulated emissions, in accordance with part E of SI2. A 'Be Seen' monitoring webform has been submitted and appended to the sustainability statement. The applicant has therefore satisfied policy SI2. A Section 106 agreement has been agreed in draft form with an obligation this carbon offset payment to be made and for the monitoring thereafter.
100. Local Plan policy BSUI1 also requires major non-residential development to achieve a BREEAM standard of 'Excellent'. This is targeted as set out in the preliminary BREEAM report. This secures a ~4% buffer enabling some leeway and ensuring a minimum score of 70% (excellent) is achieved. An interim BREEAM certificate should be submitted prior to construction, and a full certificate should be submitted post construction in accordance with the Council's sustainability SPD to ensure targets are achieved. This requirement will be secured via condition.

Air quality

101. Policies SI1 and BSUI2 require the achievement of air quality neutral. The proposal is for car free development and includes the use of Air Source Heat Pumps. The proposal therefore meets the requirements for air quality neutral development in accordance with associated London Plan guidance.
102. The Council's Environmental Health Team have been consulted on the application and have reviewed the submitted Air Quality Assessment by PEC Ltd, dated 24 October 2024. The report has concluded that the development will be Air Quality Neutral for both transport and emissions which is accepted. Mitigation will be required for the construction phase. Therefore, provided these mitigation measures are conditioned then the proposal is considered to be acceptable in this respect.

Water management and flood risk

103. Policy SI13 states that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. Brent policy DMP1 seeks to prevent unacceptable increased exposure to flood risk as a result of new development and policies BSUI3 and BSUI4 require flood risk management sustainable drainage measures on major development sites.
104. The application site lies within Flood Zone 1 for fluvial flooding and also at low risk of flooding from other sources including surface water, sewer and groundwater.
105. In addition to the initial drainage technical note, a further note revised as of March 2025 by Webb Yates has been submitted which states that in respect of greenfield run-off rates, the proposal has maximised the storage available within the site boundary by utilising a green roof, rain gardens, and an attenuation tank and states that the constraint of the railway running underneath the site has constrained the depth of the tank and the depth of storage at roof level due to increased loading. Therefore, it is considered that the storage proposed cannot be increased to allow for greenfield runoff rates.
106. Officers have reviewed the submitted documents and in line with the recommendation of the drainage consultant, to condition further details of the sustainable drainage strategy to ensure that measures to reduce surface water run off have been maximised within the site.

Biodiversity

107. Policy BGI1 (d) sets out the need for all developments to achieve a net gain in biodiversity and avoid any detrimental impact on the geodiversity of an area.
108. Biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990, for major applications made on or after 12th February 2024. This sets out the need (subject to some exceptions) that every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met ("the biodiversity gain condition"). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. This increase can be achieved

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

Preliminary ecological assessment

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

Biodiversity Net Gain (BNG) Assessment

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

Trees

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

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

119. The application is accompanied by an Arboricultural Impact Assessment and Arboricultural Method Statement by Treework Environmental Practice (reference: 241216-TRP-1.1-MTL-AIA-MS and 241216-TEP-1.1-MTL-PAMS-MS dated December 2024), which has identified nine trees in proximity of the development, T7 is identified for removal, a further two trees T1 Lilac and T2 Sycamore are in poor condition so would be felled in line with sensible tree management.
120. The principle of the removal of T7 False Acacia growing within the highway to the north elevation of the existing building is accepted (as it is growing within 2.0m of the front elevation of the building), providing its canopy cover equivalent is replaced in the vicinity. A replacement tree to be planted within the highway in the neighbourhood will be secured as part of the S106 agreement.
121. T3 to T9 are all categorised as B tree, so are material considerations in the consideration of any planning applications. T1 is categorised as a U and T2 categorised as a C tree and both to be removed. The scheme proposes 4 new trees to be planted within the rear of the site. Given the restricted area for planting these trees would need to be small species. It is recommended that further details are conditioned to any forthcoming consent.
122. T3 and T4 are both quite close to the rear of the building (southern elevation). T3 and T4 both London Plane to the rear of the proposed building are proposed to be retained but their RPA's at to be for a single storey building extending into their RPAs and so they will be impacted to some degree by the proposals. It is proposed to re-pollard T4 to accommodate the proposed building. This is in accordance with the established management of this tree. It is identified that this should take the form of at the very least reducing the canopy on the north side 3.0m. The applicant has agreed for the re-pollarding of the entire tree to be undertaken at the time of the development.
123. T5 (Lime), T6 (Norway Maple), T8 (Silver birch) and T9 (Alder) are not affected by the proposals. If the measures set out in the AIA, AMS and TPP are put in place then this will minimise any impact on T3 and T4.
124. The proposed construction compound falls within the public open space, and as such will require the agreement of Brents parks team, as it will require the closing of part of the adjacent park, including public footpath. The applicant will be advised of this through an informative.
125. In summary it is considered that the provision of four small trees within the application site together with a replacement off site tree within the vicinity of the site would be sufficient to mitigate against the loss of T1, T2 and T7 in accordance with policy BGI2. The remaining trees within the vicinity of the application site would be retained. Conditions will be added which include arboricultural supervision of any excavations within the RPA of T3 and T4 and the submission of site inspection reports at regular intervals throughout hand excavations.

Urban Greening

126. London Plan policy G5 requires commercial developments to achieve an Urban Greening Factor score of 0.3.
127. A score of 0.28 has been achieved. While this is slightly below the 0.3 target, there are limited opportunities to increase this score within the red line of the application site with the exception of further soft landscaping to the roof terrace level. Notwithstanding given the sustainable materials used in the design to reduce the carbon footprint of the scheme combined with the SUDS measures used, and when also considering that the urban greening score is a small shortfall from the required standard, on balance the proposed UGF shortfall is considered acceptable in this instance, having regard to the wider benefits of the proposal.

Land contamination

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

Fire safety

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

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

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

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

Equalities

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

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

Conclusion

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

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

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

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

DRAFT DECISION NOTICE



Brent

DRAFT NOTICE

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

DECISION NOTICE – APPROVAL

Application No: **25/0041**

To: Mr Walters
DP9 Ltd
100 Pall Mall
London
SW1Y 5NQ

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

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

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

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

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

Date: 03/02/2026

Signature:

David Glover
Head of Planning and Development Services

Notes

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

DnStdG

SUMMARY OF REASONS FOR APPROVAL

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

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

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

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

- 2 The development hereby permitted shall be carried out in accordance with the following approved drawings and documents:

Existing site, demolition floor plans and elevations

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

Proposed site, floor plans and elevations.

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

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

Supporting documents

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) Detailed drainage calculations incorporating green roofs and rain gardens as part of the strategy together with run off calculations for greenfield, existing, and proposed conditions for the following storm events:

- 1 in 10 years
- 1 in 30 years
- 1 in 100 years
- 1 in 100 years + 40% climate change

(b) MicroDrainage Calculations to demonstrate that the site will not flood during all return periods up to 1 in 100 years + 40% climate change

(c) A drawing identifying the exceedance routes during extreme storm events.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1. A statement of landscape and biodiversity design objectives and how these will be delivered over a minimum 30-year period in line with the Habitat Management and Maintenance Plan and Biodiversity Net Gain Plan as approved.

2. A masterplan showing how BNG measures integrate with Urban Greening (UGF), including retained habitats and green infrastructure (e.g. green roofs, walls, SuDS).

3. An updated Biodiversity Net Gain Assessment in line with statutory guidelines, identifying habitat areas and methods of creation.

4. Soft landscaping details including:

- Planting plans showing retained and proposed vegetation with species and sizes.
- At least 60% native species by number and diversity, with planting to support pollinators, seasonal interest, and structural variety.
- Water features and green infrastructure elements (e.g. green/biosolar roofs, rain gardens, biodiverse lawns, herb planters, etc).

5. Hard landscaping details including:

- Existing/proposed levels and ground modelling.
- Materials, boundary treatments, and permeable surfaces.

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

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

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

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

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

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

encourages uptake of cycling among building users.

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

a) At least 1 of each of the following features on the proposed building/site:

- i) multi-chamber swift bricks (preferred) or boxes,
- ii) house sparrow terraces,
- iii) bat bricks (preferred) or boxes
- iv) hedgehog holes in garden fences
- vii) deadwood and sand piles within planting areas (overwintering habitat)
- viii) larvae food plant species within planting beds (breeding habitat for butterfly species)

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

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

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

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

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

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

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

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

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

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

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

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

Reason: To safeguard the residential amenity of nearby properties.

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

Reason: To ensure the non-domestic floorspace is constructed in accordance with sustainable design and construction principles, in accordance with Brent Local Plan Policy BSUI1.

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

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

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

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

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

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

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

27

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

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

INFORMATIVES

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

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

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

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

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

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

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

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

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