

GREATER LONDON AUTHORITY

Our Ref: MGLA200526-0298

23 June 2026

Thank you for your further correspondence which the Greater London Authority (GLA) received on 20 May 2026

You have expressed dissatisfaction with the way the GLA has responded to a request for information that you have made. I am now responding to you under the GLA's internal review procedure in relation to our response to case.

Background

On 20 April 2026, you submitted the following requests for information (GLA ref MGLA210426-8503):

Please provide all environmental information relating to pre-application discussions for the proposed Gladstone Park Health Hub development in Willesden Green, including any site on or adjacent to Anson Road, NW2.

Time period: 1 January 2023 to present.

This request includes (but is not limited to):

1. All pre-application advice provided by officers, including written responses, reports, or formal pre-app advice notes.
2. All correspondence (emails, letters, attachments) between:
 - The applicant and/or their agents, and the Greater London Authority
 - The applicant and/or their agents, and the London Borough of Brent
 - The Greater London Authority and the London Borough of Brent
3. Records of any meetings or discussions, including:
 - Agendas, minutes, notes, or summaries
 - Internal notes taken by officers before or after such meetings
4. Any internal communications, briefing notes, or assessments referring to:
 - Metropolitan Open Land designation and policy compliance
 - Very Special Circumstances justification
 - Sequential test or site selection considerations
 - Transport, parking, and access impacts (including Tracey Avenue and surrounding streets)

- Crime, anti-social behaviour, or community safety considerations
 - Impact on park use, public access, or recreational space
5. Any documents indicating concerns, objections, risks, or constraints identified by officers or consultees at the pre-application stage.
 6. Any documents showing how the proposal was revised or amended in response to officer or GLA feedback

The GLA responded to you on 19 May 2026 and confirmed that we hold information within the scope of your request relating to the pre-application process. We also informed you that this information falls under the exception to disclose at Regulation (5)(e) (confidentiality of commercial or industrial information) and 12 (5)(f) (interests of the person who provided the information to the public authority).

Your complaint

With regards to our response, you have submitted the following complaint(s):

I understand the points you have made. However, this development will be presented to the public at a time of the developer's choosing, for a short window, with pre-packaged information, without any presentation of the alternative case (of having the development elsewhere). It is David vs Goliath.

The Park in no way needs a GP surgery. And the existing disused building sits quietly, doing no harm, and could easily be sensitively repurposed for the Park. The developer will have told you, the GLA, things that are not true. Without a decent response to this process, there will simply not be the time or capacity for ordinary people to provide counter-evidence. That is unfair and goes against the principles of the Freedom of information legislation.

Internal review

The Freedom of Information Act and Environmental Information Regulations give you rights to access official information. Internal reviews are handled by the Information Governance team. We are responsible for reviewing any decision and the material (if held).

This internal review is conducted by someone who was not involved in the handling of the original request. As part of your counter arguments, you have put forward that:

1. *The Park in no way needs a GP surgery. And the existing disused building sits quietly, doing no harm, and could easily be sensitively repurposed for the Park.*
2. *The developer will have told you, the GLA, things that are not true.*
3. *Without a decent response to this process, there will simply not be the time or capacity for ordinary people to provide counter-evidence. That is unfair and goes against the principles of the Freedom of information legislation.*

I appreciate the points you've raised; however, I'm not persuaded that parts 1 and 2 of your counter argument are directly relevant to the application of the exceptions and the associated public interest considerations. These points may be more appropriately addressed through the public planning consultation process.

In relation to part 3 of your arguments, I have consulted with third parties to determine whether the exceptions to disclose apply to the information in full noting that the Information Commissioner's Office (ICO) encourage against applying blanket rules for exemptions/exceptions.

Following this consultation, we have identified that some information can be disclosed to you including the GLA's GLA Formal Pre-Application Advice Letter dated 8 July 2025. Please find attached. However, we maintain that some information requires the application of the exceptions to disclose at the regulations previously cited. This information is broadly categorised below:

- I. Partial redactions - Peacock + Smith Pre-Application letter dated 28 April 2025 [Pages 1-9]
- II. Withheld in full - Corstorphine + Wright Historic Design Response (prior scheme) [Pages 10-21]
- III. Withheld in full - WSP NHS Estates Options Appraisal (full professional report) [Pages 22-29]
- IV. Withheld in full - Brent PCEG Minutes dated 22 Jan 2024 and associated correspondence [Pages 55-59]
- V. Partial redactions - Letters of Support [Pages 60-62]
- VI. Partial redactions - Brent Council Pre-Application Advice Letter dated Oct 2024 [Pages 63-69, 70 and 74]
- VII. Withheld in full - NHS / ICB Business Case — Willesden Green iHub [Pages 77 – 125]
- VIII. Withheld in full – GLA and TFL Pre-application advice [Pages 126-148 and 158 – 159]

Firstly, we maintain that Regulation 13 (Personal information) applies to the names and contact details of junior level public authority members of staff and third parties.

You have not disputed our application of Regulation 12(5)(e) and Regulation 12(5)(f), although I will further examine the balance of the public interest test in respect of your assertion that there is a need for counter address in terms of the plans submitted by the developer.

I have considered whether further exceptions to disclose apply in relation to the information that we are withholding from disclosure at:

- Regulation 12(4)(d) - Material in the course of completion
- Regulation 12(5)(a) – Public safety

Regulation 12(4)(d) states that information that is in the course of completion and applies to part II above. Please note that this information relates to a scheme that has been superseded and the new proposal can be viewed at: [New Hub Consultation | Willesden Green Surgery](#)

Regulation 12(5)(a) states that a public authority may refuse to disclose information to the extent that its disclosure would adversely affect public safety. This exception applies to elements of I and IV above in respect of references to patient cohorts and the prejudicial effect of disclosing information which may compromise their physical and mental health.

I find that the public interest weighs in favour of the remaining information we are withholding from disclosure in line with our original arguments for non-disclosure:

Effective decision-making in relation to planning matters should be informed by engagement with the public and key stakeholders; however, this engagement must be appropriately structured to be effective. There is a clear distinction between premature disclosure of partial or uncontextualised material and disclosure at the formal consultation stage. At that stage, information can be presented in full context, supported by accurate explanation, and subjected to proper public engagement processes.

Premature disclosure risks misinterpretation and unnecessary community tension, whereas delayed disclosure would better serve the public interest. In this context, disclosure would not be neutral; it would foreseeably risk harm to protected and vulnerable groups and undermine public health objectives. This weighs significantly against disclosure in the public interest test. Furthermore, disclosure at this stage would divert attention and resources away from ongoing work towards responding to external queries while discussions are still in progress. It is also likely to have an adverse effect on the GLA's ability to maintain free and frank exchanges of views, as officials may become reluctant to fully explore all options.

The GLA acknowledges the public interest in transparency in planning and development matters, and that disclosure would assist the public in understanding the decision-making process. However, the public interest is best served by ensuring that public authorities are able to debate matters robustly and comprehensively, considering all options and their potential impacts in order to reach the best possible decisions.

Further I would like to add that the public interest in maintaining the exception outweighs that in disclosure. The material contains detailed third-party property assessments, site-specific negotiating positions, commercially sensitive land values, site availability data and cohort characterisations. Disclosure would therefore be likely to prejudice the commercial interests of the applicant in an active development context.

The information also consists of discussions containing unfinished deliberative material, alongside personal data and commercially sensitive estates information. Disclosure at this stage would be likely to inhibit the free and frank exchange of views necessary for effective decision-making and could prejudice ongoing planning considerations.

There is a recognised public interest in protecting safe space for deliberation, particularly where proposals are still under active consideration. Transparency is served through the eventual publication of outcomes and decisions, without compromising the integrity of the decision-making process or disclosing sensitive personal and commercial information.

Disclosure of the pre-application advice from the GLA to the applicant balances our application of the exemptions public interest favours disclosure which have been provided in full, subject only to the redaction of personal data. This promotes openness and enables the public to understand the professional planning position.

Outcome

In reviewing your complaint, I have considered that the GLA has undertaken a reconsideration of its original response, including the arguments presented and the exemptions relied upon. This process involved consultation with relevant third-party document owners.

As a result of this review, it has been determined that some additional information can now be disclosed, subject to the application of relevant exemptions and, where necessary, appropriate redactions. This further information is provided with this letter.

The GLA has also confirmed and clarified the reason as to the remaining information within the scope of your request continues to be withheld.

I trust I have addressed your concerns. However, if you remain dissatisfied you may take your complaint to the Information Commissioner at the following address:

*Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF
<http://www.ico.org.uk/complaints>*

Yours sincerely

Sylvia Edohasim
Information Governance Manager

Ref: RM/SB/6206(28April2025)GLA

Greater London Authority
City Hall
Kamal Churchie Way
London
E16 1ZE



28 April 2025

Dear Sir/Madam,

**PRE-APPLICATION ADVICE REQUEST - PROPOSED NEW HEALTH AND WELLBEING iHUB
AT THE GLADSTONE CENTRE, 162 ANSON ROAD, LONDON, NW2 6BH - BRENT COUNCIL**

On behalf of Willesden Green Surgery with Brent ICP and NHS North West London support we submit for pre-application planning advice for a Medical Centre with integrated neighbourhood and community hub and at the above address.

Executive Summary

We are requesting a pre-application meeting with the GLA to discuss a proposal which will deliver a Medical Centre which would be operated by Willesden Green Surgery. The existing surgery has the least space per patient out of all 400 GP practices across North West London Integrated Care Board (NWL ICB) which comprises 8 London Boroughs across a population of 3 million residents. The proposal has been identified by the Brent ICP (Integrated Care Partnership) Estates Review as the number one estates priority for NHS Brent, and has been approved by the Brent Strategic Estates Group and Brent Primary Care Executive Group. The proposal has been through the NWL Technical Assurance Panel (TAP) in April 2025 and is expected to be approved by the NWL Business Case Review Group (BCRG) for financial sign off on 28/5/2025.

We have been in discussions with Brent Council about a proposal on this site for a couple of years now.

[REDACTED]

Therefore, a new facility is required as a matter of urgency, without which there would be a loss of NHS services in the area - which is already under provided for.

Therefore, we are proposing a pre-application meeting to discuss a new Phase 1 proposal for a new surgery for WGS at the site, with a higher level discussion requested regarding [REDACTED]

[REDACTED]

Pre-application discussions have been held with Brent Council. [REDACTED]

[REDACTED]

However, Brent Council will be invited any pre-application meeting in their role as both landowners and planning authority.

Previous Scheme and pre-application discussions

For ease of reference, please see attached a full record of the pre-application discussions held with the LPA for the earlier scheme:

- Pre-application covering letter (including need for the proposals);
- Corstorphine + Wright Design Response;
- Brent NHS ICB commissioned Estates Appraisal for WGS by WPS
- Brent Primary Care Executive Group 22-1-24 Minutes formally endorsing the proposals;
- [REDACTED]
- [REDACTED]
- Peacock and Smith minutes of pre-application meeting; and
- Brent Council formal pre-application advice letter 11th October 2024.

Previous versions of the business case were submitted to support the pre-application discussion. To avoid confusion and to reflect the current scheme, these are not submitted again. However, updated business case are submitted, namely:

- Brent Council Business Case - Willesden Green iHub
- NHS North West London Business Case - Willesden Green iHub

Proposed Development

Phase 1 - Current Scheme

The current scheme (referred to as Phase 1) is proposed to be an interim measure which would secure the continuity of WGS, whilst also delivering wider iHUB aspects.

Please see attached proposed:

- Corstorphine + Wright plan 2230-SK0042-1 - Proposed Site Plan
- Corstorphine + Wright plan 2230-SK0042-A2 - Proposed Site Plan

The proposal anticipates development which would form:

- Medical space to be operated by Willesden Green Surgery;
- Room for the Integrated Neighbourhood Team (INT) and community use;
- Community café;
- Health and wellbeing studios
- Pharmacy;
- Padel Court;
- Parking;
- Redeveloped basement gym (subject to Flood Risk Assessment); and
- Space for food van to be located to serve workforce (c100 full and part time staff anticipated) and wider neighbourhood use including park users

Additionally, whilst not currently included in the architectural plans, additional space is sought:

- 150sqm community hall for arts, culture, performance space, and public meetings

The parking element is considered an essential part of a viable scheme due to the nature of the medical centre use and PTAL rating of the site. Although 5 spaces are currently proposed, we would look to maximise this number if possible subject to discussions.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Background to Medical Centre Anchor Tenants

Willesden Green Surgery (hereafter WGS) is a Brent GP practice providing essential healthcare to the local community. Since it was established in 1997, the surgery has been a high achieving GP practice on Anson Road in Cricklewood, Brent.

[REDACTED]

[REDACTED]

Need for the Development

Further to the above and the previous pre-application information, which included a PowerPoint presentation outlining the full business case for the proposed development. However, for ease of reference and brevity, the need is summarised as:

Shared General Medical Space

[REDACTED]

The surgery is beyond critical capacity treating patients in unsuitable areas of the surgery, opening weekend clinics, reducing services and splitting clinical rooms in half, thereby creating 7sqm clinical rooms. The NHS Health Building Note (HBN) guidance is for clinical rooms to be 14-16sqm. A computer

and clinical area has also had to be set up in the practice corridor. Brent ICB commissioned WSP to prepare a Brent estates review. WSP capacity modelling has identified that the WGS requires 972sqm of space to provide safe care and that WGS currently has just 10.4% of the recommended space that it needs. The Surgery has the least space per patient out of all 400 GP practices across NWL ICB, which comprises 8 London Boroughs. In December 2022, the NHS England National Estates Programme inspected the WGS premises and rated it as the only Brent GP premises that is '*Condition D - inoperable or serious risk of major breakdown or failure*'.

This acute estates crisis is expected to worsen with thousands of new homes planned in the surrounding growth areas. WGS is the largest GP practice in all of the Cricklewood, Kilburn, Neasden and Staples Corner areas of Brent. All of these areas are growth areas. The local Brent Cricklewood and Neasden Station growth areas alone have over 2,500 planned new homes by 2040, without any other new NHS premises currently planned. There are over 4,000 new homes proposed within a mile radius of the new proposed site.

The proposed health centre is only 670sqm to house WGS despite Brent ICB commissioned consultants (WSP) advising that 972sqm of space is required to house WGS. These building proposes smaller 12sqm clinical rooms which is at the lower end of the NHS Health Building Note (HBN) guidance which balances medical requirements against the wish to minimise the overall scale and mass of the building.



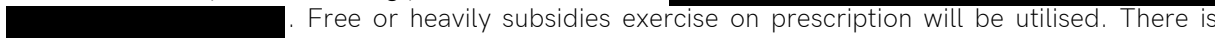
Pharmacy

It is proposed that a modest pharmacy is included within the building. The provision of an on site pharmacy is commonplace with health centres, as it allows patients to undertake a 'one stop' visit for their medical requirements. It would allow patients to collect any prescriptions at the time of their GP consultation which is hugely beneficial to patients with limited mobility or access to vehicles as it prevents the need for a secondary linked visit and reduces carbon emissions. There are no facilities of this nature within easy walking distance, and it is considered to be a benefit overall as an ancillary service.



Health and wellbeing studios

Two 25sqm indoor health and wellbeing studios are proposed, with an accompanying 10sqm corridor for access. This was not included in architectural plans as NHS and Brent Council funding was only recently identified for this space. Health and wellbeing studios are common place in health centres as part of the NHS focus on preventative care and tackling social determinants of poor health such as inactivity. The studios will provide classes such as community funded mini-tennis, mini-cricket, yoga, Pilates, Parkinson's exercise classes etc. Priority will be given for women as Brent is one of the most inactive boroughs in London, with women worse affected. Another priority group will be children as childhood obesity is a worsening problem in Brent and



. Free or heavily subsidised exercise on prescription will be utilised. There is synergy with the proposed studios and surrounding park and outdoor gym space. The studios will be able to open up onto one another and provide flexible NHS space. Integrated Neighbourhood Teams, GP Practices, and VSOs will be able to utilise the studios for a range of uses such as group consultations, and English classes.

Padel Court

In order to maximise the operation of the site, a padel court to help tackle inactivity in Brent is proposed. Padel is the fastest growing sport in Europe with new courts required to facilitate this growth. The attached map in the business case shows that there is high demand for Padel courts with Brent residents having to travel to Watford or Hyde Park for the nearest courts which are nearly always fully booked.

Padel is uniquely accessible as a low technical difficulty sport and is particularly social as it is played in doubles. The padel courts are proposed to be free for select cohorts (e.g. BMI>35) referred by practices and will provide regular female only time. There will also be limited free NHS staff use to increase GP recruitment.

The padel court would be available at a heavily discounted rate to locals who had been identified by NHS and Brent Council as facing health inequalities, which is considered a material benefit as Brent has the 4th worst inactivity levels as a whole and the most inactive women across London boroughs. The padel court would need to be covered and have external lighting

This Padel court will maximise the use of land in high density location in Inner London. Gladstone Park is renowned amongst locals for its excellent sports facilities including tennis, rugby, football and basketball. The current sports available in the park are contact sports (football and rugby) and technically difficult sports (tennis and basketball) that cater towards more active residents.

Community Hall

A local community group, Friends of Gladstone Park, has requested accommodation for arts, cultural events, performance space and public meetings with a capacity of 80-100 people to be included in the scheme. It is expected that this would require an additional 150sqm of space. There is currently limited community hall or entertainment space in the area and access to such a space would be valued by the local community.

Gladstone Park

Gladstone Park is one of Brent's most scenic parks and is a holder of the Green Flag Award. The current circa 100-year-old Gladstone Centre, and adjacent sub-station, are both eye sores, situated within the otherwise pristine park. The building is also entirely untenanted during the week due to the building's disrepair, which is regrettable as there is great potential for the space to serve the local population.

The current Gladstone Centre will be replaced with a modern aesthetic building that fits in with the scenic surroundings of Gladstone Park and serves the local community.

Soft Landscaping will mask the currently unsightly adjacent sub-station. Brent council has installed a brilliant open space gym and children's playground adjacent to the Gladstone Centre. The open space gym will see a large increase in footfall and has great synergy with a potential new health and wellbeing centre.

PLANNING ISSUES

We are requesting a pre-application planning meeting to discuss the issues surrounding the proposed development. We have reviewed the relevant policies. The following section covers the site description, outlines the planning history for ease of reference, identifies key policies and briefly covers the key elements to be considered and discussed.

The Site and Surrounding Area

The site is located on the southeastern corner of the Locally Listed Gladstone Park on Anson Road, London. The site has a PTAL rating of 1b, however, the regular 226 bus service runs from the Gladstone

Centre to Cricklewood station, Dollis Hill station, Harlesden station, Park Royal, Hanger Lane and Central Middlesex Hospital. The site is also served by the Jubilee line at Dollis Hill and Willesden Green underground station as well as Cricklewood train station. The immediate vicinity is predominantly residential in use, facilitated by several schools, Cricklewood Library and religious spaces.

The site is on Metropolitan Open Land and Gladstone Park is identified as an Open Space by the Council. The site is also within an Air Quality Management Area. The site is not within a Conservation Area. The nearest Conservation Area is Dudden Hill which is approximately 700m away from the site to the west. There are no listed buildings on or within the vicinity of the site. The site does not contain any Scheduled Ancient Monuments. There are no registered TPO's on site as per the Brent Council public record. The site is located in Flood Zone 1 and is at medium risk of surface water flooding.

Planning History

There is no relevant planning history on site as per the Council's planning portal.

Planning Policy

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the determination of planning applications to be made in accordance with the statutory Development Plan unless material considerations indicate otherwise.

The relevant development plan comprises:

- Brent Local Plan 2019-2041 (adopted February 2022)
- The London Plan (2021)

The Brent Design Guide Supplementary Planning Document (SPD) (November 2018) is also a material consideration which will have particular relevance in the determination of this planning application. The NPPF (2023) is a further material consideration.

Statutory Development Plan

The Brent Local Plan 2022

Policy DMP1 (Development Management General Policy) sets out the general principles that guide whether a development is acceptable.

Policy BSUI2 (Air Quality) sets out that major developments within Growth Areas and Air Quality Focus Areas will be required to be Air Quality Positive and elsewhere Air Quality Neutral.

Policy BSI1 (Social Infrastructure and Community Facilities) addresses the level of protection in place for existing social infrastructure and community facilities and where demonstrated exceptions can be made. The provision of new social infrastructure is also addressed in terms of where the Council will support such development.

Policy BT2 (Parking and Car Free Development) reinforces the standards that should be met by new development in relation to the provision of parking.

The London Plan (2021)

Policy GG2 (Making the best use of land) sets out that those involved in planning and development must, inter alia, prioritise sites which are well-connected by public transport and proactively explore the potential to intensify the use of land to support additional homes, promoting higher density

development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities.

Policy SD1 (Opportunity Areas) addresses the support that will be awarded by the Mayor of London to particular development proposals that meet specific criteria in order to realise their growth and regeneration potential.

Policy S2 (Health and social care facilities) outlines the responsibility of the Borough to work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to *"identify sites in Development Plans for future provision, particularly in areas with significant growth and/or under provision and to address needs across borough boundaries"*.

The policy also states, *"Development proposals that support the provision of high-quality new and enhanced health and social care facilities to meet identified need and new models of care should be supported"*.

Policy S3 (Education and childcare facilities) sets out *"Development proposals should ensure that there is no net loss of education or childcare facilities, unless it can be demonstrated that there is no ongoing or future need"*.

Policy G3 (Metropolitan Open Land) is afforded the same status and level of protection as Green Belt. The policy states the following:

- 1) *MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt*
- 2) *boroughs should work with partners to enhance the quality and range of uses of MOL.*

Policy G4 (Open Spaces) states that development proposals should not result in the loss of protected open space.

NPPF (2024)

Paragraph 8 outlines that the purpose of the planning is to help achieve sustainable development. Paragraph 8b outlines the social objective – to support strong, vibrant and healthy communities, by providing accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.

Paragraph 26 outlines that there needs to be effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.

Paragraph 96 outlines that planning policies and decisions should aim to achieve healthy, inclusive and safe places and beautiful buildings which promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, along with enabling and supporting healthy lifestyles, especially where this would address identified local health and well-being needs.

Paragraph 103 outlines that *"Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change."*

Paragraph 143 sets out the five purposes of the Green Belt:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

Paragraph 153 refers to inappropriate development and defines it as harmful to the Green Belt and states that it should not be approved except in very special circumstances. It continues to advise that *local* planning authorities should ensure that substantial weight is given to any harm to the Green Belt. It outlines that *'Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations'*.

Paragraph 154 states that a local planning authority should consider the construction of new buildings in the Green Belt as inappropriate, it goes on to list the exceptions to this regulation.

Planning Considerations

The proposed development looks to develop a new carbon neutral entity which will directly address the health needs of the community in one of the areas in most acute need of primary care space. A site search has been undertaken, instructed by Brent ICB and prepared by WSP to consider all possible estate options for WGS. The development also seeks to provide wider community facilities fully supported by the principles of the NPPF.

Why this site?

Following the identification of an acute need for the proposed healthcare facilities, NWL ICB commissioned WSP consultants to undertake a site search and options appraisal of all potential suitable facilities. The options appraisal is provided with this submission. A further options appraisal was conducted by NWL Estates Team and is included in the NWL Business Case - Willesden Green iHub, which similarly identified that there are no other viable sites.

WSP's comprehensive options appraisal has assessed 19 sites. The report has concluded that there is no other site suitable for a new facility for WGS apart from the application site.

WGS has similarly exhausted all other potential sites. In 2022 WGS submitted a business case to NWL ICB to develop their new premises at 98-100 Shoot Up Hill. However, the business was rejected by NWL on account of the costs associated with acquiring private land. Council owned land is therefore the only financially viable option that will be in-line with NHS premises budgets and district valuer valuations.

The Gladstone Park site is in the ownership of Brent Council and Brent Council have advised that there are no other vacant Council owned sites available to meet this acute need. The site represents a previously developed site in planning policy terms. However, the buildings on site at present are at the end of their life and in need of replacement. The failings of the building have led to tenants withdrawing from the site due to issues of flooding, maintenance and high costs such as heating due to poor thermal energy efficiency. Due to the extent and cost of required refurbishment, there is limited opportunity for the necessary improvements to be made to bring the facilities up to the necessary standards. In 2022, the Gladstone Nursery that previously occupied the site was forced to close, citing the costs of operating the pre-war building. Brent Council has advised against developing a new nursery on the site as there isn't thought to be a community need for any additional nursery premises.

Not only is the Gladstone Park site the only viable option, it is an ideal option. The site is on the same road as Willesden Green Surgery, Anson Road. The site is within 0.5 miles of WGS and within a 10-minute walk. The site is large enough to support [REDACTED] with acute shortages of space, as well as supporting an innovative flagship iHub with integration of community wellbeing, [REDACTED] and council services with primary and secondary care. This strategy of co-located integrated services improves health outcomes and is fundamental to the NHS Long Term Plan and formation of Integrated Care Boards (ICBs). The current building is also a vacant eye-sore and its development in the form of the attached aesthetic architectural design will complement the adjacent scenic park and provide wider economic development for the local community.

Planning Issues

The site is a previously developed site. However, it does sit on Metropolitan Open Land within Gladstone Park, for which the London Plan advises should be considered in line with Green Belt policies within the NPPF. The development would operate on a mixed-use basis, with a variety of uses. We consider that the development would represent an exception under NPPF paragraph 154(g) – in that the development would represent the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt than the existing development. Notwithstanding, the LPA do not share this view, but do consider that the site can be demonstrated to represent Very Special Circumstances with appropriate supporting information.

The site is currently occupied by built form, which due to the overall height, restricts any views into or across the site. The new footprint is very similar in size to the existing footprint. It also sits within the curtilage of the existing built form. In terms of height, the building would be lower/similar in height to buildings in the local area, notably the four storey buildings opposite on Anson Road.

It should be noted in pre-application advice that the LPA did not consider that the site represents appropriate development. Notwithstanding, the LPA considered the need for the development could be demonstrated to represent Very Special Circumstances case for development within the Metropolitan Open Lane.

Next Steps

We look forward to working with GLA officers during the pre-application stage to discuss the proposed development and to help assist the applicant with the preparation of a planning application.

Should you have any queries about the proposed development in advance of a meeting, please do not hesitate to contact [REDACTED] at [REDACTED] peacockandsmith.co.uk.

Yours faithfully,



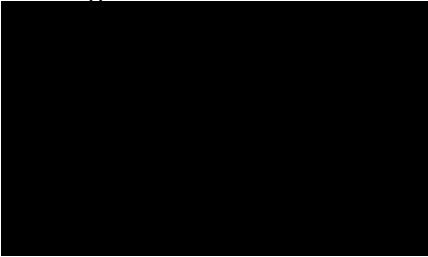
PEACOCK + SMITH

cc: Brent Council

Dear Brent Council Planning and Building Control Department,

I am writing to confirm that Willesden Green Surgery supports the application for a much needed new integrated health centre and hub in Gladstone Park, [REDACTED]
[REDACTED]

Signed:

A large black rectangular box redacting the signature of the Managing GP Partner.

Managing GP Partner, Willesden Green Surgery

Date: 21/06/2024

Tel: [REDACTED]
Fax: 020 8937 5207
Email: [REDACTED]@brent.gov.uk
Web: www.brent.gov.uk/planning[REDACTED]
Peacock and Smith
53 King Street
Manchester
M2 4LQApplication Number **24/0148/PRE**
Contact: [REDACTED]
11 November 2024**By email**

Dear Mr [REDACTED]

Case Reference	24/0148/PRE
Address	Gladstone Centre, 162 Anson Road, NW2 6BH
Proposal	Redevelopment of the site to provide new Health and Wellbeing integrated Hub (iHub) facility with 1,000sqm shared General Medical Space, waiting room and community cafe on the ground floor, Pharmacy, Community Gym, mixed-use community space, other associated health and wellbeing space, [REDACTED] [REDACTED] [REDACTED]

I refer to your pre-application enquiry validated on 17/07/24. Further to our initial pre-application meeting held on-line on 16/09/24 your proposal has been reviewed by officer's and the following advice is provided:

Existing:

The existing site area is c. 2, 210sqm. It is currently occupied by the Gladstone Centre building (c. 650sqm) which has most recently been used as a social club, rugby club house, nursery and gym. It is understood the building is currently untenanted – *further details should be provided to confirm this*. To the north, but outside the red line site boundary is a separate single storey pavilion café building. An electrical sub-station building is to the east, with children's play ground and outdoor gym areas to the west. The existing Gladstone Centre building is located within the south-western corner of Gladstone Park, which is designated Metropolitan Open Land (MOL).

There is an existing vehicle access to the site from Anson Road. The site is not in a conservation area and does not contain any listed buildings, however Gladstone Park is locally listed.

Proposed:

[REDACTED]. There are a number of different elements to the proposed building, including;

- [REDACTED]
[REDACTED]

- Pharmacy;
- Community gym;
- Flexible community space;
- [REDACTED]
- Rooftop Padel Court and community allotment / garden

Although outside of the red line boundary, it is also noted that it is proposed to relocate Kilburn Cosmos Rugby Club from the existing Gladstone Centre into the adjacent pavilion building (with associated internal / refurbishment works to this).

Servicing is proposed in front of the building in a carriage drive arrangement, which would require a new vehicle crossover to be created towards the western end of the site frontage, with space for three parking spaces indicated.

Planning History:

No recent planning history of relevance.

Policy Considerations:

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

The development plans, relevant to this proposal, comprise of the:

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

Key policies include, but are not limited to:

London Plan (2021):

GG1: Building strong and inclusive communities
GG3: Creating a healthy city
D4: Delivering good design
D5: Inclusive design
D8: Public realm
D11: Safety, security and resilience to emergency
D12: Fire safety
D14: Noise
S1: Developing London's social infrastructure
S2: Health and social care facilities
S5: Sports and recreation facilities
HC1: Heritage conservation and growth
G1: Green infrastructure
G3: Metropolitan Open Land
G4: Open space
G5: Urban greening
G6: Biodiversity and access to nature
G7: Trees and woodlands
SI1: Improving air quality
SI2: Minimising greenhouse gas emissions
SI3: Energy infrastructure
SI4: Managing heat risk
SI5: Water infrastructure
SI 12: Flood risk management
SI 13: Sustainable drainage
T2: Healthy streets
T4: Assessing and mitigating transport impacts
T5: Cycling
T6: Car parking
T6.5: Non-residential disabled persons parking

T7: Deliveries, servicing and construction

Brent Local Plan (2019-2041):

DMP1: Development management general policy

BP6: South east

BD1: Leading the way in good urban design

BSI1: Social infrastructure and community facilities

BHC1: Brent's heritage assets

BGI1: Green and blue infrastructure in Brent

BGI2: Trees and woodlands

BSUI1: Creating a resilient and efficient Brent

BSUI2: Air quality

BSUI3: Managing Flood Risk

BSUI4: On-site water management and surface water attenuation

BT1: Sustainable Travel Choice

BT2: Parking and car free development

BT3: Freight and servicing, provision and protection of freight facilities

BT4: Forming an access to a road

The following are also relevant material considerations:

The National Planning Policy Framework (NPPF) (2023)

Planning Practice Guidance

Mayor of London published guidance:

Mayor of London's Sustainable Design and Construction SPG (2014)

Fire Safety London Plan Guidance (2022)

Urban Greening Factor LPG

Air Quality Positive LPG

Energy Planning Guidance

Brent published guidance:

SPD1 Brent Design Guide (2018)

Brent's Planning Obligations SPD (2022)

Brent's Sustainable Environment & Development SPD (2023)

Community Involvement:

The Council's Statement of Community Involvement (SCI) sets out our recommended approach to community engagement to be undertaken by applicants at pre-application stage. The NPPF emphasises the importance of applicant's carrying out community engagement on their emerging proposals. It is strongly encouraged that effective engagement takes place, involving local communities at the pre-application stage. The applicant will be expected to demonstrate how the community has been involved in the formulation of the proposals. Proposals of this scale are considered to be 'small major developments' and the published SCI recommends the following engagement;

-Discuss proposal with statutory bodies, neighbours and other nearby occupiers / owners of properties / land / local interest groups (i.e. Friends of Gladstone Park) at earliest possible stage in developing the proposal.

-Flyers/mail drop to interested parties.

-The use of Brent Council's pre-application advice service is strongly encouraged.

Although not recommended in the SCI, given the nature of the proposal, and its potential to affect a wide range of residents and stakeholders it is also recommended that at the appropriate time public meeting(s) are held with interested parties, and public exhibitions and drop in sessions in an accessible local venue.

Engagement with elected Members / Ward Councillors is recommended, to ensure they are aware of any emerging proposals at an early stage of the process.

Further pre-applications consultation / engagement is recommended as follows:

- As the proposal involves development on MOL this would be a strategic application that is referable to the Mayor of London. It is strongly encouraged that you engage in pre-application discussions with the Greater London Authority (GLA) at the earliest opportunity.
- Designing Out Crime Officers are available to discuss your development in relation to designing out crime and the fear of crime. Please contact them via DOCOMailbox.NW@met.police.uk.
- With the local NHS Primary Care Trust / Brent Integrated Care Partnership (ICP). It should be demonstrated how the proposed facility aligns with Brent ICP local estates strategy.
- In the event that you are intending to progress the proposal towards a detailed planning application, then it is strongly advised that you engage at an early stage with both the Quality Review Panel and Community Review Panel. This will provide independent design review and ensure the participation of the local community as any proposals are developed.
<https://www.brent.gov.uk/planning-and-building-control/design-and-placemaking>

REMARKS:

Land uses and principle of development:

The site is designated as Metropolitan Open Land (MOL), forming part of the wider Gladstone Park. Given the MOL status, any future application would need to be referred to the Mayor. It would also be referable to the Secretary of State. As the proposal would constitute development on MOL then the following key planning considerations need to be applied.

Firstly, the NPPF (paragraph 154) sets out the construction of new buildings as being inappropriate in the Green Belt (and therefore by definition MOL), save for certain exceptions (a-g). Exception criteria (g) states an exception could be where development involves;

“limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

- *not have a greater impact on the openness of the Green Belt than the existing development; or*
- *not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.”*

The supporting information provided makes the case that the proposed development would represent an exception under this criterion, as previously developed land. This is because the proposed site is already occupied by a building of a similar ground floor built form as the proposed development.

It is not considered that criteria (g) can be applied here, however, due to the fact the application site is within a wider park, and it is noted the glossary for the current NPPF, in defining ‘previously developed land’ specifically excludes park land from the definition, it states;

*“Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. **This excludes:** land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; **land in built-up areas such as residential gardens, parks, recreation grounds and allotments;** and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.*

In summary, the site is not considered to meet the definition of previously developed land, it is specifically excluded from this definition in the current NPPF.

Paragraph 152 of the NPPF states that inappropriate development is, by definition, harmful to the Green Belt (and therefore by definition MOL) and should not be approved except in very special circumstances (VSC), unless they meet certain exceptions (paragraph 154). However, as referred to above, it is not considered that any of the Green Belt exception tests would be met.

Paragraph 153 goes on to say that “*when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.*”

Any increase in building footprint and / or volume would be a material consideration in assessing the harm to the MOL, including impact on its openness, as a result of inappropriate development. The impacts on openness would need to be considered both spatially and visually.

London Plan policy G3 (MOL) is in general conformity with the NPPF, it gives MOL the same status and level of protection as Green Belt. It states that MOL should be protected from inappropriate development in accordance with the NPPF tests that apply to Green Belt.

London Plan policy G4 (Open Space) says that proposals should not result in the loss of protected open space. Brent Local Plan policies DMP1 seeks to retain existing open space.

In conclusion, the proposed development within Gladstone Park would represent inappropriate MOL development, therefore a case of VSC would need to be made. Assuming this case is made in order to try to justify inappropriate development on MOL then the Council would need to assess whether or not VSC exist that would clearly outweigh any harm the proposals would cause to MOL by reason of inappropriateness, as well as any other planning harm identified as a result of the proposals.

It is noted the supporting information provided begins to make a case for VSC existing. It is stated the proposal is to meet an acute local need for healthcare and that this is the only feasible site for such a development within the area at need. It will also re-provide some existing on-site facilities which are of a poor quality, including a gym, café, and refurbished changing rooms/club house.

Social infrastructure:

Local Plan policy BP6 states that proposal should plan positively to meet social infrastructure requirements by securing provision for needs arising from new housing development, including the provision of new health, cultural and community facilities.

London Plan policy S1, criterion C states that proposals for high quality social infrastructure which addresses a local need should be supported. Criterion D of the same policy identifies that proposals which seek to make the best use of land and include the co-location of social infrastructure, should be supported. This is further supported by London Plan policy S2, criterion B of which states that proposals which provide high quality health and social care facilities to meet identified need should be supported.

Local Plan policy BSI1 is also relevant, it safeguards existing social infrastructure, and sets out criteria that new social infrastructure is required to be assessed against.

You would need to address criteria (a-d) when justifying the loss of the existing building. 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;

The site scores a ‘very poor’ Public Transport Accessibility Level (PTAL) of 1b, this is reflective of the lack of access to public transport, which includes only one bus route (with stops adjacent to the site) and no train/tube stations within a 12 minute walk of the site. Preferably a multi-use facility such as the proposed hub would be located either in a town centre or a growth area.

You would be expected to provide further justification for the proposal in the context of criteria (e), and measures to offset this impact may be required to make the application acceptable in planning terms.

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

[REDACTED], and therefore any replacement facility would need continue to meet the existing community it is intended to serve, and where the facility is located geographically will be key part of the consideration of this. It is felt this would continue to be the case with regards the existing Willesden Green Surgery, which is also located on Anson Road and within 0.5 miles (10 mins walk from the site). However, it is less clear with regards the existing [REDACTED] this is located a further distance away on Shoot-up-Hill (21 mins walk from the site). There are concerns due to the distance of this existing surgery to the proposed site, therefore it would need to be demonstrated that it is within the current practice's catchment area, and that the proposed replacement facility would meet criteria c, d and f, in Local Plan policy BSI1.

[REDACTED] about these proposals, and share the outcomes of this (including patient surveys) with the Council as part of future pre-application discussions. [REDACTED]

(g) provided in flexible and adaptable buildings;

The proposal would be of a high modern standard, seeking to achieve net zero carbon. The building will include a number of spaces, including the dedicated healthcare floorspace, as well as flexible community and studio spaces, a community gym, a pharmacy and a padel court. The flexibility of the spaces make this facility capable of meeting a range of differing user needs. It is also set out that there is 12% additional capacity built in to meet changing needs over time. Whilst this is noted further evidence should be provided which demonstrates how this has been built into the design, and how spaces could potentially be amalgamated to meet changing needs in the future.

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

The proposal is to replace existing on-site sports and community facilities, combining these into a modern development to facilitate the delivery of new healthcare floorspace, and would be located within Gladstone Park, adjacent to an existing café/pavilion and children's playground. The proposal also sets out it would also be the intention to carry out internal amendments to the adjacent Pavillion building, modifying it to provide a club house space for KCRC, whilst retaining a large portion of the existing changing rooms. The café, which is currently understood to only open once a month when the rugby team play, will be replaced on the ground floor of the new healthcare building as a community café, and will double up as a waiting room for the healthcare use. The links between this part of the facility and how it serves the park will need further consideration, as it is unclear how direct access between it and the park will occur. The current drawings show no boundary treatments, and it is considered this is unlikely given the value / sensitivity of the use and limited overlooking on most sides during off-peak times.

(i) maximising wider community benefit, through if necessary, required formal community use agreements

This would need to be demonstrated – a Community Access Plan would be required to set this out in more detail and it is likely this would be secured by planning obligation.

Re-provision of the previous nursery use has been ruled out as the applicant notes the Council do not believe there to be any demand for further spaces in the area, or flexible hall space available to the community – this needs to be qualified. Anecdotal evidence would suggest that due to changes to government funding for nursery spaces, that their demand is increasing. Further evidence demonstrating the demand for nursery spaces in the local area should therefore be provided to justify non re-provision.

Need & Alternative Sites

Need

The submission is accompanied by a number of supporting documents which seek to demonstrate both the acute medical need for the development, and the absence of any suitable alternative sites.

As referred to above, Local Plan policy BP6 identifies that when considering proposed development in South East place, which the site is in, these should where appropriate deliver new health facilities. In terms of demonstrating any VSC that would outweigh any harm to MOL then it is expected that any case for VSC would rely heavily on the acute medical need for the development and the absence of alternative site.

[REDACTED] Indeed Brent, the most deprived borough in the NWL area, has the lowest healthcare funding, space, and number of GPs per resident. The WPS report commissioned by Brent ICB identified that for WGS alone an additional 972sq.m. of floorspace would be required to bring it up to standard. [REDACTED]

[REDACTED] this is a compromise and one which seeks to deliver efficiencies through scale and co-location with other synergistic uses. [REDACTED]

[REDACTED] It is submitted that the surgery is beyond critical capacity treating patients in unsuitable areas of the surgery, opening weekend clinics, reducing services and splitting clinical rooms in half, resulting in clinical rooms as small as 7sqm (n.b. The NHS Health Building Note (HBN) guidance is for clinical rooms to be 14-16sqm.

In December 2022, the NHS England National Estates Programme inspected the WGS premises and rated it as the only Brent GP premises that is '*Condition D – inoperable or serious risk of major breakdown or failure*'.

The acute need is identified as having been exacerbated by the closure of the nearby Cricklewood Walk-in Centre in 2021 and is contended to likely get worse going forward with the planned housing development and population growth in the area which is not currently addressed as part of any NHS estates capacity plan. As a result, the WGS has been identified by the NHS as being effectively '*inoperable or at serious risk of major breakdown or failure*', with the WGS threatening closure should it not find alternative premises. [REDACTED]

[REDACTED] The proposal therefore seeks to deliver enhanced and accessible integrated healthcare at scale serving 20,000 residents in an area currently underserved by GP practices. It [REDACTED]

Notwithstanding the letter of support provided [REDACTED]

A detailed and robust need case, including demonstration of this need from key stakeholders would be expected to form part of any future case for VSC. Whilst it might be successfully demonstrated there is an acute medical need, it would also need to be demonstrated that there is a requirement for the range of other related and other building uses proposed, as these are currently contributing to the size of the proposed building on MOL.

Alternative sites

WPS were commissioned to undertake an assessment of potential alternative sites for a new health care facility, to meet the acute need, this included the consideration of 19 different sites / options (including a 'do nothing' option). These options included exploring spaces at existing nearby facilities and potential new build sites. A number of potential new build sites were deemed too expensive, with land costs of up to £3m in some cases. Other sites were discounted due to factors like them being considered too far away from the current practices, not having enough spaces, having accessibility/transport issues, or being unavailable/unable to acquire. This concluded the proposed consolidated solution for WGS [REDACTED], at the proposed site, was the preferred way forward.

It is also submitted that Council owned land is the only financially viable option. This would need to be demonstrated in support of the proposed site, especially with its MOL designation.

To summarise, there does appear to be case for the proposal, in terms of meeting an acute need for primary healthcare within a currently deprived area, and a lack of alternative sites. This should form part of any future case advanced for VSC. This does not suggest that the purported benefits of the scheme and any VSC,

when weighed against its impact upon the openness of, and harm to the MOL, as well as any other planning harm is on balance acceptable. The balancing exercise will need to be carried out at planning application stage.

Design, scale, appearance, and layout:

The NPPF seeks developments of high quality design that will function well and add to the overall quality of the area, responding to local character and history, reflecting the identity of local surroundings while not discouraging appropriate innovation, establishing or maintaining a strong sense of place, and optimising the potential of the site to accommodate an appropriate amount and mix of development.

London Plan Policy D3 sets out a design-led approach to new development that responds positively to local context and optimises the site's capacity for growth by seeking development of the most appropriate form and land use, while Policy D5 seeks inclusive design without disabling barriers. Policy D8 encourages exploration of opportunities to create new public realm where appropriate, and to maximise its contribution. Proposals should be designed so that they are safe, secure and resilient to emergency events (policy D11) and through design must achieve the highest standards of fire safety, in accordance with policy D12

Brent's Local Plan Policy DMP1 and the Brent Design Guide SPD1 provide further guidance on principles of good design, and Policy BD1 seeks the highest quality of architectural and urban design.

As the massing and design of the building is progressed further, it is important we are provided with additional CGI's / view perspectives to understand how the building will be seen and appreciated from all sides, especially from within Gladstone Park. As a minimum these views should include the locations identified in section 2.2 of the submitted design pack, others may also be required. This will help to inform future pre-application discussions.

[REDACTED], with the top floor reduced in footprint (accommodating the Padel Court), so the feedback provided is reflective of this, notwithstanding that reference is made in your cover letter to the building being reduced to three stories (without revised details of this then we can't comment). This is to be located broadly in the same location as the existing, though with an increase in building footprint. The existing building is part single, part two storey, and it is noted there are 3-storey flatted developments nearby, as well as 4-storey flatted developments directly opposite the site. In this context, and in terms of how the building relates to the existing context and character of the area, [REDACTED] However, the MOL designation is a material consideration, and as referred above any increase in building footprint and / or volume would be material to whether or not the proposal would have a greater impact on the openness of the MOL, and material to whether or not any potential harm to the MOL, caused by inappropriate development, would be clearly outweighed by any case for VSC. It follows that the greater the footprint and volume of the replacement building then the greater potential there is for it to result in harm (both spatially and visually) to the openness of the MOL. Whilst the re-provision and intent of the development is welcomed, the extent to which some of the spaces and additional uses are required is questioned and has not been fully justified to date. In light of the site MOL constraints you are therefore advised to re-consider any opportunity to rationalise the floorspace and uses proposed, so that the building can be reduced.

In terms of general design observations, at this initial stage the following is noted / advised for your consideration;

- It does appear that the main building entrance is civic in scale, which is considered appropriate and what would be expected for a civic building of this nature. This is something that should be maintained as the design evolves;
- Design, appearance and materiality should take some cues from the architectural language found on the mansion blocks opposite the site. This isn't evident at the moment;
- As noted above, we need to see additional views to better understand how the building would relate to and be seen from within Gladstone Park;
- Further details are required to demonstrate how this would connect to wider movement networks in the area, including those within Gladstone Park;
- As you will recall from the initial pre-app meeting, a concern was highlighted with regards the extent the proposed building is set back within the site, and in turn the extent of hardsurfacing indicated to the front, with the potential for this space to become vehicle dominated. This is not considered to be an acceptable design response for a civic building like this within a park setting and you are strongly

advised to explore moving the building closer to Anson Road (subject to not impacting on existing mature trees along the frontage). This should then allow for a softer and less vehicle dominated frontage, which will provide greater pedestrian priority. Any essential parking / stopping for servicing and deliveries could then potentially be accommodated in a different arrangement to the rear or side of the building close to the existing sub-station. Though this would be subject to seeing further details to demonstrate that it would not result in unacceptable impacts on existing trees, and so that any alternative vehicle access arrangements can be assessed by Highways Officers;

- The proposed carriage driveway arrangement indicated does appear to result in the loss of an existing mature street tree. This should be avoided when considering alternative access arrangements;
- It is evident from the design pack the building has currently been designed with a main entrance addressing Anson Road, but what about other secondary entrances? Given the buildings relationship to the park there is an opportunity for additional entry points that are legible and relate to existing movement networks. These would help to provide further activation on all sides of the building, and would most likely be useful for managing access to the building at different times of the day, in particular community access and access to the Padel Court outside of the typical medical uses hours. There needs to be further consideration given to the overall access strategy for the building given the range of uses proposed, and the different user groups expected;
- The architectural intent looks promising at this stage, though it would be useful to explore other options for how to treat the top floor (Padel Court enclosure).

Heritage:

Gladstone Park is locally listed, therefore a Heritage Statement would be required with any submitted application to assess any potential heritage harm.

Flood risk and drainage:

Parts of the site falls within floodzone 3a (surface water flooding). A Flood Risk Assessment (FRA) incorporating a sequential test should be submitted with any forthcoming application, in line with Local Plan policy BSUI3. A SuDS / Drainage Strategy will also be required to demonstrate how the surface water flood risk is to be managed and mitigated, in line with Local Plan policy BSUI4 and London Plan policies SI5 and SI13. It is expected that greenfield run off rates for surface water be achieved, and where this cannot be achieved then this should be clearly justified (see policy BSUI4).

The Local Lead Flood Authority (LLFA) would be a statutory consultee on any submitted planning application, any future comments they may have will be a material consideration.

Fire safety:

High standards of safety, security and resilience including fire safety would be expected in a development of this scale, and the proposal should demonstrate compliance with London Plan policies D11 and D12 in this respect. A Fire Statement would be required in support of any detailed planning application to address the policy requirements of London Plan policy D12. Tracking drawings for fire appliance access to the building should be provided.

Energy and sustainability:

Sustainability should be embedded in the design of the building, however, it is not fully apparent that this is the case currently, due to the lack of information provided.

For major developments, an Energy Strategy and Sustainability Statement is required in accordance with Local Plan Policy BSUI1, demonstrating at the design stage how sustainable design and construction measures will mitigate and adapt to climate change over the lifetime of the development. Major non-residential development is required to achieve a BREEAM 'Excellent' rating to comply with Local Plan policy BSUI1, and this would need to be appropriately evidenced.

All major developments are expected to achieve zero carbon standards including a minimum 35% reduction on the Building Regs 2021 Target Emission Rates achieved on site, in accordance with London plan SI2. Predicted emissions should be appropriately evidenced through submission of an Energy Strategy. This should include an assessment of overheating risk and any mitigation measures, as set out in London Plan policy SI4. Opportunities for use of renewable technologies should be considered, including maximising any opportunity for PV panels on available roof space.

Note, any shortfall in achieving the target emission standards (i.e. 35% reduction) is to be compensated for by a financial contribution to the Council's Carbon Offsetting Fund, or through off-site measures to be agreed with the Council. The policy also requires a commitment to monitoring of, and reporting on, energy performance and this would be secured through s106 agreement, together with revised energy strategies to be submitted at detailed design and post-completion stages and a two-stage financial contribution.

Circular Economy principles should be embedded into the project and this should be evidenced in any future application.

The Energy Strategy and Sustainability Statement should demonstrate compliance with the Councils adopted Sustainable Environment & Development SPD, and policies in chapter 6.7 of Brent's Local Plan and policies in chapter 9 of the London Plan.

Environmental health considerations:

Air Quality:

The site is within an Air Quality Management Area (AQMA), so accordingly an Air Quality Impact Assessment (AQIA) is required for any future application, as well as an Air Quality Neutral Assessment. The assessment(s) shall include the impact of the construction works and operation of the development on local air quality. The assessment(s) shall include mitigation proposals for any identified adverse impacts, including should it be found that the development is not air quality neutral. The AQIA should be in line with the approach set out in the GLA's Air Quality Positive guidance.

In the event of any future approval a condition would be required to ensure that all Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" dated July 2014 (SPG).

Noise:

A Noise Impact Assessment should be provided in support of any planning application. The noise assessment should include noise from plant/machinery, as well as from the use of the recreational facilities and the impact noise from the development will have on the surrounding residential premises. Consideration should also be given to the sound insulation between floors to ensure that noise and vibration from the gym use does not impact on the ground floor commercial use.

The rated level from any plant/machinery required (including ancillary equipment) shall be 10db(A) below the measured background noise level when measured at the nearest noise sensitive premises. An assessment of expected noise levels shall be carried out in accordance with BS4142:2014, and details of any mitigation measures required also provided.

A Construction Method Statement would be required (and secured by condition), to control dust, noise and other environmental impacts throughout any construction phase.

Contaminated ground:

Environmental Health officers advise A small section of the proposed site has been highlighted as potentially contaminated. It is recommended that a land contamination assessment is undertaken due to the areas of development being potentially contaminated due to previous uses. IN the event of a future approval conditions would be required relating to post demolition ground investigation, remediation and verification.

Lighting:

If the Padel Court and rooftop recreational facilities are to be used in the evening then consideration should be given to any lighting required and an assessment should be submitted in line with the ILP guidance on reduction of obtrusive light.

Odour:

The development will also include a café, so presumably there will be extraction equipment required. The applicant should ensure that an Odour Assessment is submitted with the application and this should be in line with EMAQ guidance on odour from commercial kitchens.

Green Infrastructure, Landscape, Urban Greening, Ecology, Biodiversity:

Limited detail has been provided to date to comment on specifically, however, please ensure the following is taken into account as any future scheme is developed.

Green Infrastructure / Landscaping:

The green infrastructure (GI) and landscaping proposals submitted to date are lacking in detail and need to be developed further - a detailed Landscape Strategy is required. There are several trees growing within and directly adjacent to the site which may be affected by the proposed building and associated hard surfacing including parking which is proposed to the front of the building. There is also a mature street tree to the frontage on Anson Road which is likely to need to be removed with the current layout to achieve the access – *this should be avoided*.

Any full application should be accompanied with an Arboricultural Survey and Arboricultural Impact Assessment which should demonstrate how damage to the most important trees has been minimised, and this will include any proposed buildings and hard standing within the Root Protection Area of trees. Where trees are to be removed as part of the proposals, there should be adequate hard and soft landscaping proposals to illustrate that any trees have been replanted with the equivalent canopy cover at time of planting.

Urban Greening:

London Plan Policy G5 requires major development proposals to include urban greening measures as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. An urban greening strategy should be developed which seeks to maximise a range of opportunities on-site, and demonstrates an urban greening factor (UGF) of a minimum 0.3 is to be achieved. In meeting the UGF emphasis should be placed on solutions that support biodiversity.

Ecology:

Due to the site's setting, within the wider park, a detailed Ecological Impact Assessment may be required at submission, including protected species surveys and details of any required mitigation measures. This requirement should be confirmed with the Council's Ecology Officer, and if required the scope and methodology should also be agreed with them in advance.

Existing wildlife habitats shall be suitably protected from development. Sensitive designed lighting would be required in order to minimise ecological impacts on the park.

Biodiversity:

As you will I'm sure be aware achieving 10% biodiversity net gain (BNG) is now mandatory for major development proposals, such as this. Brent's Policy BG11 seeks a net gain in biodiversity and encourages urban greening proposals to also support this aim. The DEFRA Metric provides an assessment tool and the use of the current up-to-date version of the Metric is required to quantify and demonstrate the % of BNG that would be achieved on site as a result of development.

A BNG Assessment will be required to demonstrate that a minimum 10% net gain would be delivered post development.

I would refer you to the published Brent Validation List, this sets out recently introduced biodiversity requirements (at application submission stage).

Transport considerations:

Anson Road is a local distributor road and bus route. It lies within Controlled Parking Zone "GA" operating between 10am-3pm on weekdays. On-street parking is prohibited at all times along the site frontage though, with a bus stop clearway at the eastern end of the site. The nearest pay and display bays are located on Anson Road to the west of the Park Avenue North, about 150m walk from the site. These bays are generally lightly used.

Public transport access to the site is poor, with just one bus route within 640 metres (8 minutes' walk) and no nearby railway stations.

Car parking allowances in Brent are set out at Appendix 4 of the Local Plan. As the site has poor access to

public transport services, up to one car parking space per 10 users on site at any time would be allowed. No breakdown of the likely attendance for the various uses within the building across a typical week has been provided. However, with no standard width parking spaces proposed anyway, maximum standards would not be exceeded.

Three disabled parking spaces are proposed and these ensure that visitors with mobility issues that need to park close to the building are catered for (though as referred to above you are encouraged to explore alternative arrangements for on-site parking in any event). Electric vehicle charging points should be provided to at least one of the proposed spaces.

Other car-borne visitors to the site would need to park on-street in the area and in this respect, there are plenty of pay and display bays along the northern side of nearby Kendal Road adjoining Gladstone Park that visitors could use.

The existing vehicular access arrangements are proposed to be amended to provide a secondary means of access and it is assumed that this is intended to allow the resultant carriage drive to operate in a one-way direction. If it operates one-way eastwards though (as would suit the access points best), then the echelon parking bays should be reoriented so that vehicles reverse into bays and not out of them (which is safer). Please note though that the position shown for the new 6m wide crossover at the western end of the site would require the removal of a mature street tree. This is not supported and an alternative position needs to be shown for any new access, preferably towards the centre of the site so that it also provides plenty of clearance to the pedestrian refuge in Anson Road, and avoids impact on existing trees.

Alternatively, parking could continue to be served from just the one access point at the eastern end of the site. This would have the benefit of providing a more pedestrian friendly environment with more soft planting and seating in front of the building, rather than the car dominated frontage with limited footway space as shown.

Bicycle storage requirement will largely depend upon staffing numbers, particularly for the health centre, so further information on this is sought. Parking will need to include secure spaces for staff and external spaces near the building entrance for visitors.

There are no specific servicing requirements for the building / use, but it is expected that occasional van deliveries will be required, so to ambulances. With the layout shown, these can use the carriage drive to stand and unload in front of the building.

However, if the carriage drive is not provided, then unloading could potentially occur from the side / rear of the building if supported on Transport grounds, or on public highway fronting the site (potentially using an inset loading bay on a widened footway if there are any concerns about conflict with the bus stop opposite).

To support any future planning application, a Transport Statement will be required, including a Healthy Streets Assessment of key routes to the site from each direction. A Travel Plan will also need to be provided to help to manage transport requirements for staff and visitors. These documents are particularly important to help address the shortcomings of the site in terms of its poor PTAL rating.

Engagement with Parks Service and other stakeholders:

Engagement with the Council Parks Service will be required if the proposals are progressed. Following a discussion with them about the proposals there are a number of initial observations and feedback points they raise that you would need to take into account and address accordingly, including;

- Potential noise from the Padel Court impacting on park users and nearby residents;
- Lighting impacts onto the park;
- Lack of landscaping generally around the building to soften its impact on the park;
- [REDACTED] from within the park – further views are required to make a more informed judgement however;
- Potential shade impacts on the park

In terms of how the proposal would affect Kilburn Cosmos Rugby Club (KCRC), you will need to provide greater clarity on the intended future arrangements. KCRC are currently located in the existing Gladstone Centre and you have stated the application will *“support the rugby club to relocate the clubhouse into the*

existing adjacent Pavillion Café building, which includes the rugby cub changing rooms, with a modern internal refurbishment". This will involve repurposing the existing café space (to be re-provided within the new hub building) to accommodate a new modern clubhouse.

Whilst there would be no objection, in principle, to providing improved facilities that provide a long-term base for KCRC, there are a number of matters that you would need to address and / or clarify before the proposed arrangements could be supported – *as set out below*;

- As a key existing stakeholder it is essential you engage from the outset with KCRC. We would need to see this evidenced and understand how the proposed arrangements would meet their requirements;
- Who will pay for the Pavillion building refurbishment works?
- Parks have highlighted that in the event the proposed arrangements went ahead, and the Pavillion building was refurbished and repurposed for KCRC, then there would need to be access provided from time to time for local groups to also use this building (this is what happens currently). It couldn't exclusively be used by KCRC;
- Existing and future lease arrangements need to be established. Any new lease must not be offered on terms that are too costly for KCRC to remain on site

Public benefits

It is acknowledged the proposed integrated hub facility would result in benefits in terms of improved and expanded range of medical services, improved health outcomes for residents as well as increased access to these services. Other benefits may also potentially be felt by the range of associated uses being proposed.

The facility will potentially provide significant community benefits. The benefits should be identified as part of any future planning application, as any benefits will need to be weighed against any identified planning harm, which will include harm to MOL.

Documentation:

Any forthcoming planning application will need to be submitted in line with Brent's published Validation Checklist which can be found at:

<https://www.brent.gov.uk/planning-and-building-control/planning/applying-for-planning-permission#whattoincludewiththeapplication>

*please note the Biodiversity Net Gain requirements at validation stage.

Section 106:

A planning application of this scale and nature could be required to enter into a s106 legal agreement to secure planning contributions / obligations where these have been identified as being necessary to make the development acceptable in planning terms, directly related to the development and reasonably related to the development in terms of scale and type, potentially including (but not limited to) the following:

- Contributions to Brent's carbon offsetting fund to mitigate any shortfall in achieving zero carbon emissions;
- Highway works necessitated by the development, secured via s278 agreement;
- Community Access Plan;
- Potentially works to the Pavillion building for KCRC (as this would be outside of the red line boundary)
- Any other obligations identified through the planning process considered reasonable and necessary
- Payment of the Council's legal and other professional costs in preparing and completing the agreement, and monitoring its performance

Further guidance can be found in the adopted Brent SPD on Planning Obligations.

Community Infrastructure Levy (CIL):

Non-health or medical related elements of the proposed development may be liable to both Brent's and the Mayor of London's Community Infrastructure Levy. Details of the charging schedules can be found at:

<https://www.brent.gov.uk/services-for-residents/planning-and-building-control/planning-policy/community-infrastructure-levy-cil/>

Summary:

In summary, the principal concerns at this stage are; that the proposal would represent inappropriate development on MOL (a compelling case for VSC would need to be demonstrated that clearly outweighs the harm to MOL, as well as any other planning harm), the extent of non-compliance with Local Plan policy BSI1 (for both existing and new social infrastructure) including whether the proposed facility is appropriately located within the community it intends to serve and demonstration of 'need' for the facility (including the full range of building uses being proposed). These material considerations are all addressed in further detail above, within the relevant sections. It would also need to be successfully demonstrated there are no alternative sites available where the development could come forward on land that is not MOL. We would expect consideration of all the other matters set out in this response to be duly considered in bringing forward a suitable scheme. Please also bear in mind that during the process of considering any subsequent application (and following public consultation) other material planning issues may emerge. To assist with this, you may choose to carry out your own pre-application engagement with local people, members and other relevant stakeholders.

The advice above sets out matters that would need to be addressed in the submission of a detailed planning application areas where further justification and / or information would be required to make the proposal acceptable in planning terms. It would also be helpful if you could provide details to set out how the proposed facility would be funded.

Should you wish to progress the proposed development towards submission of a detailed planning application then it is recommended that a Planning Performance Agreement (PPA) is entered into to cover resourcing of further pre-application engagement. Please let me know if this is something you would like to do.

Please be advised that this advice is given at officer level and does not represent the formal view or decision of Council. This can only be obtained through the submission of a planning application.



Principal Planning Officer
Communities and Regeneration
Brent Council

Good Growth

Our ref: 2025/0380/P21
Date: 08 July 2025

Site: The Gladstone Centre
LPA: Brent
Our reference: 2025/0380/P2I

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

CC TfL

The Gladstone Centre, 162 Anson Road

Local Planning Authority: Brent

The proposal

Redevelopment of the site to provide new Health and Wellbeing centre with shared general medical space, waiting room and community café, pharmacy, gym, mixed use community space, a padel court, and parking.

The applicant

The applicant is **Willesden Green Surgery, Brent ICP/ NHS North West London**, and the agent is **Peacock and Smith**.

Assessment summary

Land Use Principles: The principle of the provision of a Health and Wellbeing Centre may be acceptable in the area; however, the issues around the use of this specific site need to be further understood through a better understanding of the component elements, a robust needs assessment, and a robust sequential test of alternative sites, and further information on the existing use. The catchment area of the proposed facility and how this catchment area relates to both existing and proposed health provision needs to be understood.

Urban Design: The design should minimise harm to the MOL and be led by a qualitative exercise of accommodating the desired functions in a way that best preserves the characteristics of MOL.

Transport: Cycle parking should meet London Plan Policy standards, and car parking should be minimised and understood. As a starting point delivery and servicing should be on site and this needs to be fully addressed in any future application.

The specific matters in relation to sustainable development and environmental issues should be addressed in full.

The future application will need to address the issues raised in this report with respect to MOL, design and transport.

Follow up meetings

A follow up meeting with the GLA is recommended on design to progress the key next steps above.

Context

1. On 17 June 2025 a pre-planning application meeting to discuss a proposal to develop the above site for the above uses was held on MS Teams with the following attendees:

GLA group

- [REDACTED] Strategic Planner (case officer)
- [REDACTED], Team Leader Development Management
- [REDACTED], Assistant Area Planner TfL
- [REDACTED] Senior Urban Design Officer

Local Authority

- [REDACTED], LB Brent

Applicant

- [REDACTED], Corstophine and Wright Architects
 - [REDACTED], Corstophine and Wright Architects
 - [REDACTED], Willesden Green Surgery
 - [REDACTED] Peacock and Smith
 - [REDACTED], Director of Property, Brent Council
 - [REDACTED], MD Brent Integrated Care Partnership
2. The advice given by GLA officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of an application.

Site description

3. The site is located on the southeastern corner of the Locally Listed Gladstone Park. The site is currently occupied by the Gladstone Centre; it is understood that the Centre has most recently been used for community uses including a social club, rugby club, nursery and gym, but is currently untenanted and it would be useful to confirm the nature and status of the existing uses. Opposite the park the immediate vicinity is predominantly residential in use.
4. The site is on Metropolitan Open Land (MOL) and Gladstone Park is identified as an Open Space by the Council.
5. The site has a PTAL rating of 1b.

Details of this proposal

6. The application proposes the redevelopment of the site to provide a new Health and Wellbeing Centre with shared general medical space and waiting room for Willesden Green Surgery; a community café, pharmacy, gym, mixed use community space, a padel court, and parking.
7. The future application is expected to be referable to the Mayor under the following category of the Mayor of London Order 2008:

- 3D: “Development (a) on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and (b) which would involve the construction of a building with a floorspace of more than 1,000 square metres or a material change in the use of such a building.”

Strategic planning issues and relevant policies and guidance

8. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the London Plan 2021, and the Brent Local Plan (2022).
9. The following are also relevant material considerations:
 - The National Planning Policy Framework was published on 12 December 2024 and is a material consideration for all planning decisions;
 - Relevant strategic supplementary planning guidance (SPG) and London Plan Guidance (LPG), including on urban design, sustainability, and transport, which can be found on the GLA’s website [here](#).¹

Summary of meeting discussion

10. Following a presentation of the proposed scheme from the applicant team, meeting discussions covered strategic issues with respect to land use, urban design, and transport. Issues with respect to sustainability were not discussed in detail at this stage. Based on the information made available to date, GLA officer advice on these issues is set out within the sections that follow.

Land use principles

11. The applicant proposes to relocate the existing Willesden Green Surgery to the application site to create a Health and Wellbeing Centre, which would include a new GP surgery, community café, pharmacy, gym, mixed use community space, padel court, and parking.
12. It is understood that the existing facility for Willesden Green Surgery is not fit for purpose and is in need of a new facility to accommodate additional patients and projected population growth of the area.
13. It is understood that the existing use of the site is social infrastructure and therefore falls within the ambit of London Plan Policy S1, which protects social infrastructure and recommends, where redundant, that such uses be explored for whole or partial reuse as a first option. The reuse of the site for a social infrastructure use, including a health facility, could potentially be supported in principle, subject to meeting other policy requirements.
14. London Plan Policy S2 supports the provision of high-quality new and enhanced health and social care facilities to meet identified need and requires that new health facilities should be accessible by public transport. As a PTAL 1b site this is not the case here; however, it is recognised that a needs case for

¹ <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance?ac-63512=63507>

a local facility could still be made as it is understood that this proposal has come about as result of an existing surgery no longer being fit for purpose.

15. London Plan Policy G3 grants MOL the same status as Green Belt and it is thereby protected from inappropriate development in accordance with local, regional, and national policy and guidance.
16. The proposal includes construction of new buildings to accommodate various uses and a padel court.
17. It is understood that the padel court may be an outdoor recreational use and could fall under the NPPF exception para 154(b). As park land it is not possible for the site to be previously developed land (as defined in NPPF) and therefore the proposed development would not meet any of the NPPF exceptions. In addition, it is understood that the scale and footprint of the proposed development would be greater than the existing development (including possible sprawl of padel courts) which would result in harm to the openness of the MOL. As such the proposed development in its entirety would be inappropriate development on MOL and the applicants will need to construct a very special circumstances case. This will need to demonstrate that the potential harm to MOL by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.
18. In addressing this, the starting point for the principle of the use of this site should be a rigorous needs test to establish the requirement for a health facility in this location. At present the proposed development appears to comprise a series of uses; the relationship between these is unclear, in particular which uses are essential and in effect part of the primary function, and whether the uses are a coherent whole. Given the importance of a needs assessment in support of the development the uses need to be fully understood along with the need for them and the links between them covered in the assessment, particularly given the greater the quantum of development the greater the harm.
19. This assessment must be supported by a robust sequential test to demonstrate that this is the only site available. The needs test and sequential test should have a relationship to the catchment area of the proposed health facility so that the policy priorities can be fully understood.
20. The applicant is advised to engage with the LPA to address the need for the development and sequential testing of available sites.
21. Given the nature of the use and the proposed closure of the existing health facility an Equalities Impact Assessment should be submitted with the application.

Urban Design

Development layout and public realm

22. Proposals for the site should focus on ensuring the open characteristics expected of MOL are preserved and enhanced.
23. The site layout should be driven by the need to reduce the impact of built form on the landscape within and beyond the site, visually and environmentally. The position of buildings on site should be carefully considered to retain visual permeability and enhance physical links through and beyond the site where

possible. A collection of connected smaller forms may be more successful in achieving this than a single larger building form.

24. The applicant highlighted the importance of patients being able to access different health and wellbeing support systems within one building. Through a design led site optimisation process, the applicant should explore what built forms are able to achieve this in the least impactful way: whether a large single building mass is the best design solution to achieve the desired 'one front door' approach to healthcare access; or whether the same operational result could be achieved through provision of physically connected individual forms, that may achieve better openness and visual permeability, reducing green belt impact.
25. Alternative footprint options that allows built form to be broken down should be explored to allow for reduced visual impact over-all. Enclosed corridors at ground level could be explored as a way of connecting separate building forms to achieve a reduced impact site layout whilst retaining internal connectivity.
26. As well as visual impact, the optimisation exercise should also consider where everything is best placed on the site to be most convenient and get the most use and serve the community in the most extensive way possible.
27. The design should be led by a qualitative exercise of accommodating the desired functions in a way that best preserves the expected characteristics of MOL, rather than a quantitative exercise of matching existing building footprint on site.

Architectural quality

28. Preliminary views presented, although for a previous iteration of the proposals, indicate that the applicant intends to deliver a high-quality building of a 'civic' nature, in line with the LPA's preferences. The early indication of quality is welcome.

Fire safety

29. In line with Policy D12 of the London Plan the future application should be accompanied by a fire statement, prepared by a suitably qualified third party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.

Heritage

30. The site is in a Locally Listed Park, and appropriate Heritage and Visual Impact Assessment should be provided.

Transport

Access

31. As the existing access to the site is located adjacent to the bus shelter, any access changes or movements will need to be agreed with TfL.

Cycle Parking

32. Cycle parking for all elements should be provided in line with the quantum set out in London Plan Policy T5 and designed in line with London Cycling Design Standards.
33. Noting the proposed medical and community uses TfL request that enlarged Sheffield stand spaces are provided in excess of the required 5% of total cycle parking mix.

Car Parking

34. At the meeting it was discussed that 5 disabled persons parking spaces are currently proposed; however, the provided plans show 3 disabled persons parking spaces. Clarification is required on the provision. Any maximisation of car parking is unlikely to be supported given that this is a local centre, and the majority of users will live within walking/ cycling and public transport distance.

Deliveries, Servicing and Construction

35. It is unclear how deliveries, servicing and construction will be managed. However delivery and servicing activity should take place on site in line with London Plan Policy T7, with reversing manoeuvres kept to a minimum in line with the Mayors Vision Zero Approach.
36. The bus stops adjacent to the site and the passengers waiting must be protected and remain safe and open throughout the construction period.
37. No delivery or servicing activity should be undertaken from within the bus cage at any time.
38. Opportunities for cargo bikes should be considered with end of journey facilities provided.

Transport Mitigation

39. Utilising the trip generation data, which should be provided within the Transport Assessment, improvements to the accessibility of bus stops within the vicinity of the site may be sought.

Required Documents

40. The following documents should be included within the submission: A Healthy Streets Transport Assessment, A Delivery and Servicing Plan, A Construction Logistics Plan and an ambitious Travel Plan in line with the modal shift targets.

Sustainable development and environmental matters

Energy strategy

41. GLA officers recommend the applicant consider embedding the energy strategy in the early design stage.
42. Further assessment guidance, template, and recommended condition wording are available on the GLA [website](https://www.london.gov.uk/sites/default/files/gla_energy_assessment_guidance_june_2022_0.pdf)². The London Plan requires all major developments to meet the Mayor's net-zero carbon target, and so carbon savings must be maximised on site.

² https://www.london.gov.uk/sites/default/files/gla_energy_assessment_guidance_june_2022_0.pdf

Whole Life-Cycle Carbon Assessment

43. GLA officers recommend the applicant considers the WLC principles at the early design stage, in accordance with London Plan Policy SI2.
44. Further assessment guidance, template, and recommended condition wording are available on the GLA [website](#)³.

Circular Economy

45. GLA officers recommend the applicant considers the CE principles at the early design stage, in accordance with London Plan Policy D3 and SI7.
46. Further assessment guidance, template, and recommended condition wording is available on GLA [website](#)⁴.

Environmental issues

Urban greening and biodiversity

47. The applicant must calculate the Urban Greening Factor and Biodiversity Net Gain and seek to achieve the specified target prior to the submission of the planning application.

Sustainable drainage and flood risk

48. The drainage strategy should aim to reduce surface water discharge from the site to greenfield rates and manage surface water run-off in line with the hierarchy set out within London Plan Policy SI13. Use of Sustainable Drainage System (SuDS) measures should be maximised. Water efficiency measures and rainwater harvesting should also be incorporated into the scheme design.

Air quality

49. The site falls within the Brent Air Quality Management Area. The applicant must provide an air quality assessment which should demonstrate that the scheme would be air quality neutral and identify any required mitigation.

Conclusion

50. Land Use Principles: The principle of the provision of a Health and Wellbeing Centre may be acceptable in the area; however, the issues around the use of this specific site need to be further understood through a better understanding of the component elements, a robust needs assessment, and a robust sequential test of alternative sites, and further information on the existing use. The catchment area of the proposed facility and how this catchment area relates to both existing and proposed health provision needs to be understood.
51. Urban Design: The design should minimise harm to the MOL and be led by a qualitative exercise of accommodating the desired functions in a way that best preserves the characteristics of MOL.

³ <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance>

⁴ <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance>

52. Transport: Cycle parking should meet London Plan Policy standards, and car parking should be minimised and understood. As a starting point delivery and servicing should be on site and this needs to be fully addressed in any future application.
 53. The specific matters in relation to sustainable development and environmental issues should be addressed in full.
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for further information, contact GLA Planning Unit (Development Management Team):

██████████ **Strategic Planner (case officer)**

email: ██████████@london.gov.uk
