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PLANNING STATEMENT

To: Planning Department London Borough of Brent

Site: 934 North Circular Road, London NW2 7JR

Proposal: Change of Use of Two Residential Units (C3) to Two Separate 3-Person HMOs (C4)

Date: 1 September 2026

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1.0 Introduction

1.1 This Planning Statement is submitted in support of a change-of-use application for the conversion of two existing residential units at 934 North Circular Road from Use Class C3 to two separate 3-person Houses in Multiple Occupation (Use Class C4). The proposal involves internal reconfiguration only, with no external alterations, extensions or changes to the building envelope. The purpose of this statement is to provide a clear and comprehensive narrative assessment of the proposal, demonstrating that the development accords with national, regional and local planning policy and represents a sustainable, well-managed and appropriate form of residential accommodation.

1.2 The application is supported by a full suite of technical documents, including a Fire Safety Strategy prepared in accordance with London Plan Policy D12, an Operational & Management Statement, a Waste & Transport Note, and a Minimum Space Standards Assessment confirming compliance with Brent's HMO amenity requirements. Together, these documents demonstrate that the proposed HMOs will operate safely, responsibly and without adverse impact on neighbouring properties or the wider area.

1.3 The Planning Statement also incorporates policy context relating to the site's confirmed location within the Staples Corner Growth Area (SC13) and Site Allocation BEGA2, its designation as Strategic Industrial Land (SIL) / Locally Significant Industrial Site (LSIS), and its exemption from Brent's borough-wide Article 4 Direction. These strategic designations materially strengthen the acceptability of the proposed change of use.

2.0 Site Context

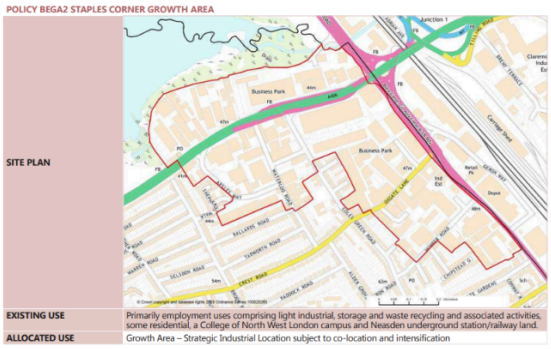
2.1 The application site comprises the first and second floors of a mixed-use building located on the North Circular Road. The ground floor contains commercial premises, which are unaffected by this proposal. The surrounding area is characterised by a blend of commercial activity at street level and residential accommodation above, forming a typical mixed-use corridor along this strategic route.



2.2 The site lies within the Staples Corner Growth Area (SC13) and forms part of Site Allocation BEGA2, as confirmed in the Brent Local Plan (2019–2041). The Local Plan identifies Staples Corner as a major strategic regeneration zone comprising:

“Primarily employment uses comprising light industrial, storage and waste recycling… some residential… bounded by the A5 Edgware Road and the North Circular Road.”

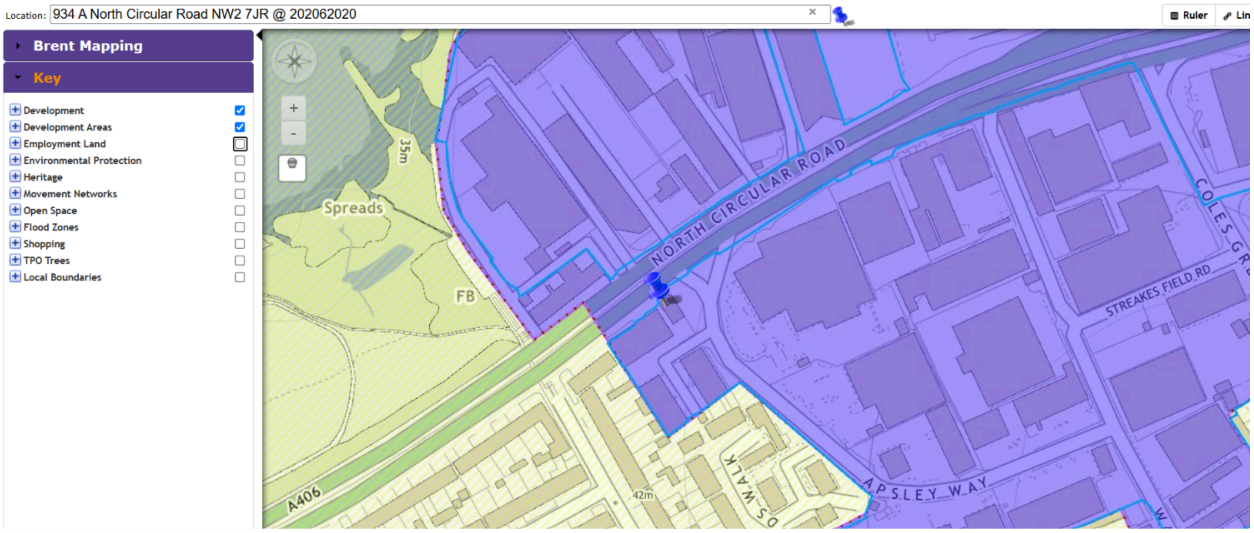
(Brent Local Plan, p.72–74)



POLICY BEGA2 STAPLES CORNER GROWTH AREA	
SITE PLAN	
EXISTING USE	Primarily employment uses comprising light industrial, storage and waste recycling and associated activities, some residential, a College of North West London campus and Neasden underground station/railway land.
ALLOCATED USE	Growth Area – Strategic Industrial Location subject to co-location and intensification

INDICATIVE CAPACITY	Estimated to be 2,200 dwellings subject to a masterplanning process which will provide additional clarity.		
TIMEFRAME FOR DELIVERY	1-5 Years	6-10 Years	11+ Years
	0	0	2200
ADDRESS	Staples Corner Strategic Industrial Land, adjacent to the Edgware Road and North Circular Road		
AREA	42.7 hectares		
DESCRIPTION OF EXISTING SITE	The site covers a multiple of light industrial, heavier industrial and distribution uses, plus other uses such as wholesale and trade counter in a mixture of old and more modern premises of varying heights and quality. It is bounded on the north by the Welsh Harp/ Brent Reservoir and Neasden Recreation Ground open spaces. To the east is the A5 Edgware Road, beyond that warehousing and the Brent Cross Opportunity Area in London Borough of Barnet. To the south and east there is residential development, principally semi-detached or terraced two storey dwellings and some very limited number of 3-6 storey properties. The heavily trafficked North Circular Road cuts through the northern part. With the Edgware Road it presents a very hostile pedestrian and cyclist environment. A number of footbridges across the North Circular. Direct vehicular access to and from these main roads is mostly limited resulting in longer vehicle journeys.		
OWNERSHIP	Private Sector		
PLANNING HISTORY	None of a substantial nature specific to the relevance of the policy allocation.		
PTAL RATING	3 (Current and 2031 estimate) principally along the North Circular Road, Edgware Road, Oxgate Lane and Humber Road and elsewhere 2 (Current and 2031 estimate) The potential West London Orbital station at Brent Cross West will increase PTAL levels.		
PLANNING CONSIDERATIONS	• The site is Strategic Industrial Land and is proposed as a Growth Area and for co-location/ intensification consistent with London Plan policies. • It will be subject to a masterplan process undertaken between Brent, Barnet and the GLA. This will comprehensively identify how the area can increase useable industrial floorspace (predominantly light industrial, general industrial and storage and distribution). This will represent a minimum 0.65 plot ratio or replacement of the existing amount of industrial floorspace, whichever is the greater, whilst potentially providing a new mixed use community. • Developments of non-industrial uses will not be permitted in the growth area until the council has approved a masterplan, which shows how intensification / co-location will achieve an increase in industrial floorspace. Piecemeal development which would prejudice the delivery of a comprehensive masterplan will not be permitted.		

The Growth Area is designated for co-location and intensification, with an indicative capacity of 2,200 dwellings, subject to masterplanning. The site also sits within a designated Strategic Industrial Location (SIL) and Locally Significant Industrial Site (LSIS) corridor.



2.3 The site is explicitly exempt from Brent's borough-wide Article 4 Direction (confirmed 3 February 2022). The Direction's Second Schedule confirms that Article 4 applies to the entire borough except:

> *"the Old Oak and Park Royal Development Corporation Area, the draft Local Plan's site allocations within the Church End Growth Area and all parts of the other seven Growth Areas."*

Staples Corner is one of these exempt Growth Areas. As a result, permitted development rights for changes of use from C3 to C4 remain intact.

2.4 The existing residential units are accessed from a dedicated entrance at ground-floor level, leading to an internal staircase serving both floors. The site has a Public Transport Accessibility Level (PTAL) of **2** (2023 rating), which is characteristic of the Staples Corner industrial corridor. Despite this moderate rating, the location benefits from strong practical accessibility due to:

- immediate proximity to multiple high-frequency bus routes along the North Circular Road
- safe walking access to nearby employment and services
- secure long-term cycle parking for six bicycles
- car-free occupation secured through tenancy agreements

These measures ensure that the development operates sustainably and without generating additional parking demand.

2.5 **Historic Use Precedent**

Property history confirms that 934 North Circular Road previously operated as a 6-room HMO, as evidenced in historic auction records (Savills Property Auctions). The later conversion into two flats reduced the building's historic capacity. The proposed change of use reinstates the building's long-standing shared-housing function in a modernised, compliant form.

(Lot 134 November 2025 Savills)

savills AUCTION CALENDAR

Key features

- To be offered on Wednesday 5 November
- Good size plot
- 2 x 2 bedroom self-contained flats over the first and second floors
- Flats approximately 700 sq ft each
- Freehold three storey detached building
- Comprising ground floor offices
- Previously used as an HMO
- Development potential subject to consents

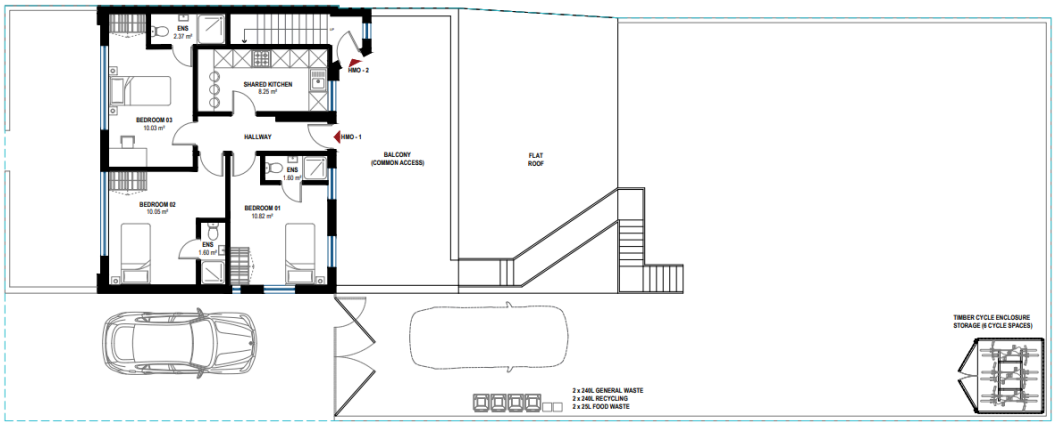
3.0 Proposed Development

3.1 The proposal seeks permission for the change of use of two existing residential units to two separate 3-person HMOs. Each HMO contains:

- three single-occupancy bedrooms
- private en-suite facilities
- a shared kitchen
- clear internal circulation
- a safe and legible escape route

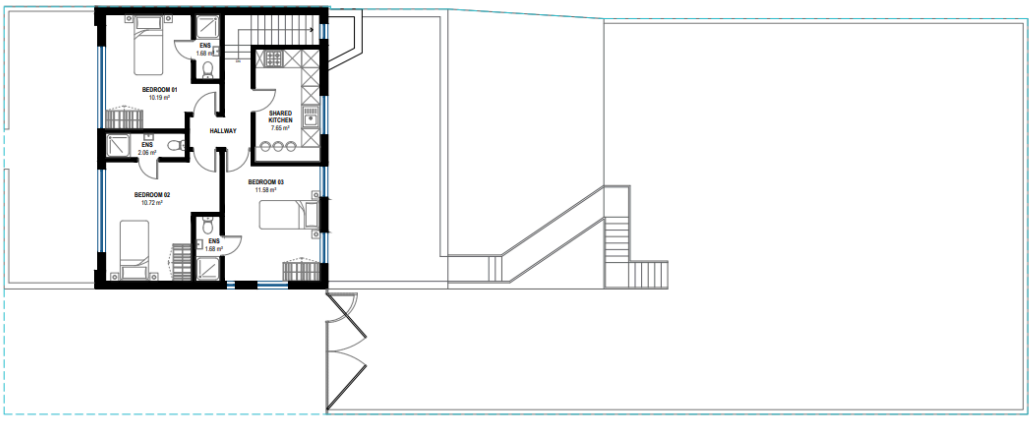
No external alterations are proposed, and the building envelope remains unchanged.

Proposed first floor layout



PROPOSED FIRST FLOOR
G.I.A. = 56.10 SQM.

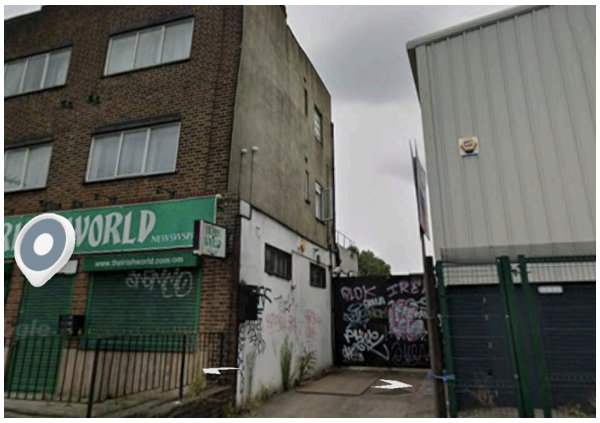
Proposed second floor layout

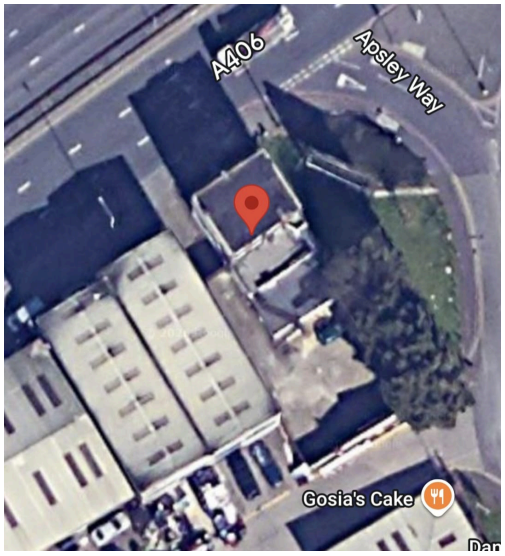


PROPOSED SECOND FLOOR
G.I.A. = 59.59 SQM.

3.2 The provision of private en-suite facilities significantly reduces internal movement and supports a calm domestic environment. The shared kitchens exceed Brent's minimum HMO standards and provide adequate worktop space, storage, and safe cooking facilities. All servicing activity, including refuse disposal and cycle storage, occurs at ground-floor level and does not interfere with private rooms.

3.3 Refuse storage is provided within a dedicated ground-floor refuse area, accessed directly from the internal entrance area. Cycle storage for six bicycles is provided within a secure timber enclosure, also accessed from the internal entrance area .





Aerial view of the site showing the side and rear access

4.0 Planning Policy Context

National Planning Policy Framework (NPPF – August 2026)

4.1 The August 2026 update to the National Planning Policy Framework places renewed emphasis on delivering a diverse range of housing types, improving design quality, and making more efficient use of existing urban land. The proposed conversion directly responds to these national objectives by introducing two small, well-managed Houses in Multiple Occupation that provide flexible accommodation suited to single occupants, young professionals and individuals seeking affordable, high-quality rooms within an established residential environment. The NPPF makes clear that local authorities should support forms of housing that widen choice and meet identified local needs, and the proposed HMOs contribute positively to Brent's housing mix by offering a tenure and format that is increasingly in demand.

4.2 The updated NPPF continues to encourage the effective use of land, particularly in urban areas where intensification can be achieved without physical expansion of the built form. This proposal exemplifies that principle. It makes efficient use of existing residential floorspace, optimising the internal layout to deliver six high-quality en-suite bedrooms across two units, while avoiding any external alterations, extensions or changes to the building envelope. The development therefore aligns with the NPPF's direction to prioritise gentle intensification and the reuse of existing buildings as a sustainable means of increasing housing supply.

4.3 The update also strengthens the national focus on achieving well-designed places. The proposed HMOs provide generous bedroom sizes exceeding 10 m^2, private en-suite facilities that enhance privacy and reduce internal movement, and compliant shared kitchens that meet all relevant amenity standards. The internal configuration has been carefully considered to ensure clarity of circulation, safe escape routes and a coherent layout that supports everyday living. These qualities reflect the NPPF's requirement that new residential accommodation, including conversions, must deliver functional, attractive and high-quality environments for occupants.

4.4 Noise and amenity remain central considerations within the updated NPPF, which requires development to avoid significant adverse impacts on health and quality of life. A detailed Noise & Disturbance Statement accompanies this application and demonstrates that the proposed HMOs will operate quietly and without harm to neighbouring properties. The combination of en-suite facilities, acoustic upgrades and professional management ensures that the intensity of use remains modest and domestic in character, fully consistent with the expectations of the NPPF.

4.5 Taken together, the proposal accords with the updated 2026 NPPF by widening housing choice, making efficient use of existing land and buildings, delivering high-quality internal accommodation, and safeguarding residential amenity. It represents a sustainable and policy-compliant form of development that contributes positively to Brent's housing objectives.

The London Plan (2021)

Policy H9 – Houses in Multiple Occupation

Policy H9 recognises HMOs as an important part of London's housing offer and supports proposals that provide good-quality, well-managed accommodation. The proposed development meets Policy H9 because it delivers:

- generous single-occupancy bedrooms (all exceeding 10 m²)
- private en-suite facilities for every occupant
- compliant shared kitchens
- professional management oversight

The proposal therefore provides high-quality, flexible accommodation suited to single residents and young professionals, consistent with London Plan H9.

Policy D6 – Housing Quality and Standards

Policy D6 requires adequate internal space, storage, layout efficiency and ceiling heights. The proposal meets D6 as:

- all bedrooms exceed 10 m²
- ceiling heights comply with D6 requirements
- integrated storage is provided
- internal circulation is clear and legible
- shared kitchens exceed Brent's minimum HMO standards

The proposal therefore meets and exceeds the internal quality expectations of Policy D6.

Policy D12 – Fire Safety

Policy D12 requires all residential developments to demonstrate fire safety at the planning stage. A full Fire Safety Strategy has been submitted, detailing:

- protected escape routes
- FD30S fire-rated doors
- interlinked smoke and heat detection
- emergency lighting
- fire-safe construction

This ensures full compliance with Policy D12.

Policy D14 – Noise

Policy D14 requires development to avoid adverse noise impacts. The proposal complies with D14 because:

- acoustic upgrades are incorporated
- private en-suite layouts reduce internal movement
- tenancy agreements include behavioural controls
- no external alterations are proposed

Noise impacts are therefore contained within the building envelope.

Policy T5 – Cycle Parking

Policy T5 requires secure long-term cycle parking. The proposal provides:

- six secure cycle spaces
- a dedicated timber enclosure
- internal access from the lobby

This meets the long-term cycle parking requirements of Policy T5.

Policy T6 – Car Parking

Policy T6 supports car-free development in accessible locations. Although the site has a PTAL of **2**, this is typical for the Staples Corner industrial corridor and is mitigated by:

- immediate access to multiple high-frequency bus routes
- secure long-term cycle parking
- tenancy agreements securing car-free occupation

The proposal therefore complies with the intent of Policy T6.

Brent Local Plan (2022)

Policy BH13 – Residential Amenity and Quality

Policy BH13 requires high-quality internal layouts and adequate space. The proposal meets BH13 as:

- all bedrooms exceed 10 m²
- private en-suite facilities enhance privacy
- shared kitchens exceed minimum standards
- internal circulation is clear and efficient

The proposal therefore provides high-quality residential accommodation.

Policy BH14 – Houses in Multiple Occupation

Policy BH14 supports HMOs where they:

- meet Brent's HMO Standards
- do not harm neighbouring amenity
- do not result in over-concentration
- provide adequate refuse and cycle storage

The proposal satisfies BH14 because:

- all rooms exceed minimum sizes
- refuse storage is provided at ground-floor level
- secure cycle storage is provided
- no external alterations are proposed

Policy DMP1 – Development Management General Policy

Policy DMP1 requires development to protect amenity and character. The proposal complies because:

- no external works are proposed
- internal layouts are safe and legible
- noise impacts are mitigated
- servicing arrangements are discreet and domestic in character

Policy TRN3 – Parking Controls

Policy TRN3 supports car-free development in accessible locations. The proposal complies because:

- car-free occupation is secured through tenancy agreements
- cycle parking is provided
- PTAL 2 is typical for the corridor and mitigated by bus accessibility

4.1 GROWTH AREA, SIL/LSIS & ARTICLE 4 EXEMPTION

Staples Corner Growth Area (SC13), BEGA2 & Strategic Industrial Land (SIL/LSIS)

The site lies within the Staples Corner Growth Area (SC13) and forms part of Site Allocation BEGA2, as set out in the Brent Local Plan (2019–2041). The Local Plan identifies Staples Corner as a major strategic regeneration zone comprising:

"Primarily employment uses comprising light industrial, storage and waste recycling… some residential… bounded by the A5 Edgware Road and the North Circular Road."

(Brent Local Plan, pp. 72–74)

The Growth Area is designated for co-location and intensification, with an indicative capacity of 2,200 dwellings, subject to masterplanning. The site also sits within a designated Strategic Industrial Location (SIL) and Locally Significant Industrial Site (LSIS) corridor.

This strategic context materially strengthens the acceptability of the proposed change of use because:

- Growth Areas are intended to accommodate flexible residential intensification
- SIL/LSIS areas support co-location of residential uses where they do not prejudice industrial capacity
- The proposal involves no external works and no loss of industrial floorspace
- The proposal reinstates historic HMO use in a modernised, compliant form

Article 4 Direction — Confirmed Exemption

The site is explicitly excluded from Brent's borough-wide Article 4 Direction (confirmed 3 February 2022). The Direction's Second Schedule confirms that Article 4 applies to the entire borough except:

> "the Old Oak and Park Royal Development Corporation Area, the draft Local Plan's site allocations within the Church End Growth Area and all parts of the other seven Growth Areas."

Staples Corner is one of these exempt Growth Areas. As a result:

- permitted development rights for C3 → C4 remain intact
- the proposal is not restricted by Article 4
- the change of use is acceptable in principle

This exemption is further supported by the site's SIL/LSIS designation, where Brent encourages flexible land use as part of wider regeneration.

5.0 PLANNING APPRAISAL

5.0 Planning Appraisal

5.1 The principle of development is acceptable. The site is located within the Staples Corner Growth Area (SC13) and Site Allocation BEGA2, where flexible residential intensification is supported. The borough-wide Article 4 Direction does not apply to this location, meaning permitted development rights for C3 → C4 remain intact. The proposal also reinstates the building's historic HMO function, as the property previously operated as a 6-room HMO before its conversion into two flats.

5.2 Transport impacts are minimal. The development is car-free, supported by secure cycle storage and tenancy clauses prohibiting car ownership. PTAL 2 is typical for the corridor and is mitigated by strong bus accessibility, walking access to employment and services, and sustainable travel measures. Refuse storage is located at ground-floor level with a clear route to the kerbside, ensuring efficient servicing without impact on the public realm.

5.3 Noise impacts have been fully assessed and mitigated. The proposal includes acoustic upgrades, en-suite layouts and management controls to ensure that the HMOs operate quietly and without harm to neighbouring amenity.

5.4 The proposal meets all relevant London Plan and Brent Local Plan policies, including H9, D6, D12, D14, T5, T6, BH13, BH14, DMP1 and TRN3, and aligns with the strategic objectives of the Staples Corner Growth Area and SIL/LSIS designations.

6.0 Conclusion

6.1 This Planning Statement demonstrates that the proposed conversion of the two existing residential units at 934 North Circular Road into two self-contained 3-person Houses in Multiple Occupation represents a high-quality, sustainable and policy-compliant form of residential accommodation. The development has been assessed against the National Planning Policy Framework, the London Plan and the Brent Local Plan, and it is clear that the proposal aligns with the objectives and detailed requirements of each tier of policy.

6.2 In terms of national policy, the NPPF encourages the efficient use of existing residential floorspace and supports the delivery of a diverse range of housing types to meet local needs. The proposal responds directly to this requirement by providing well-managed, small-scale accommodation suited to single occupants and young professionals, thereby contributing positively to Brent's housing mix. The NPPF also emphasises the importance of achieving well-designed places and protecting residential amenity. The internal layout, generous bedroom sizes, private en-suite facilities and compliant kitchen provision ensure that the HMOs deliver a high standard of living accommodation, while the accompanying Noise and Disturbance Statement confirms that the development will operate without adverse impact on neighbouring properties.

6.3 At the regional level, the proposal satisfies the relevant policies of the London Plan. Policy H9 recognises HMOs as an important component of London's housing offer, and the development meets this expectation by providing high-quality rooms, appropriate facilities and professional management. Policy D6 requires adequate internal space, storage and ceiling heights, all of which are achieved comfortably within the proposed layout. Policy D12 requires a Fire Safety Strategy for residential developments, and a comprehensive strategy has been submitted demonstrating safe escape routes, appropriate alarm systems and fire-resistant construction. Policy D14 requires development to avoid harmful noise impacts, and the proposal incorporates acoustic measures and management controls to ensure compliance. Policies T5 and T6 require secure cycle parking and support car-free development; the scheme provides long-term cycle storage and secures car-free occupation through tenancy agreements, ensuring that transport impacts remain minimal despite the site's PTAL 2 rating.

6.4 The proposal also accords with the Brent Local Plan. Policy BH13 requires high-quality internal layouts and adequate space, both of which are clearly demonstrated through the Minimum Space Standards Assessment. Policy BH14 supports HMOs where they meet Brent's amenity standards, do not harm neighbouring properties and do not result in over-concentration. The development meets all of these criteria: the rooms exceed minimum sizes, refuse and cycle storage are appropriately provided, and the proposal does not alter the external appearance of the building or introduce any new impacts. Policy DMP1 requires development to protect amenity and character, and the absence of external works ensures full compliance. Policy TRN3 supports car-free development in accessible locations, and the proposal secures this through tenancy restrictions and the provision of cycle parking.

6.5 Taken together, the development provides high-quality accommodation that exceeds minimum space standards, operates as a car-free scheme supported by secure cycle parking, incorporates robust fire-safety and noise-control measures, and is subject to professional management oversight. It does not generate adverse amenity or transport impacts and represents an efficient and sustainable use of existing residential floorspace. The proposal contributes positively to Brent's housing stock and aligns with the strategic objectives of the NPPF, the London Plan and the Brent Local Plan.

6.5 For these reasons, the development constitutes sustainable development in the context of the NPPF, and it is respectfully requested that the chmage of use be granted.