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Brent

Planning Committee

Wednesday 18 July 2018 at 6.00 pm
Conference Hall - Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ

Membership:

Members Councillors:	**Substitute Members** Councillors:
Denselow (Chair) Johnson (Vice-Chair) Chappell Colacicco Hylton Lo Maurice Sangani	Abdi, Ahmed, S Butt, Dar, Ethapemi, Kabir, W Mitchell Murray and Patterson Councillors Colwill and Kansagra

For further information contact: Joe Kwateng, Governance Officer
0208 937 1354; joe.kwateng@brent.gov.uk

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democracy.brent.gov.uk

The press and public are welcome to attend this meeting

Members' briefing will take place at 6.00pm in Boardrooms 7 and 8

Please note this meeting will be filmed for live broadcast on the Council's website. By entering the meeting room you will be deemed to have consented to the possibility of being filmed and to the possible use of those images and sound recordings for webcasting.

Please note that this agenda has been re-published on Tuesday 10 July 2018 to reflect the appointments made at the Council Meeting on 09 July 2018.

Notes for Members - Declarations of Interest:

If a Member is aware they have a Disclosable Pecuniary Interest* in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent and must leave the room without participating in discussion of the item.

If a Member is aware they have a Personal Interest** in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent.

If the Personal Interest is also significant enough to affect your judgement of a public interest and either it affects a financial position or relates to a regulatory matter then after disclosing the interest to the meeting the Member must leave the room without participating in discussion of the item, except that they may first make representations, answer questions or give evidence relating to the matter, provided that the public are allowed to attend the meeting for those purposes.

***Disclosable Pecuniary Interests:**

(a) **Employment, etc. -** Any employment, office, trade, profession or vocation carried on for profit gain.

(b) **Sponsorship -** Any payment or other financial benefit in respect of expenses in carrying out duties as a member, or of election; including from a trade union.

(c) **Contracts -** Any current contract for goods, services or works, between the Councillors or their partner (or a body in which one has a beneficial interest) and the council.

(d) **Land -** Any beneficial interest in land which is within the council's area.

(e) **Licences-** Any licence to occupy land in the council's area for a month or longer.

(f) **Corporate tenancies -** Any tenancy between the council and a body in which the Councillor or their partner have a beneficial interest.

(g) **Securities -** Any beneficial interest in securities of a body which has a place of business or land in the council's area, if the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body or of any one class of its issued share capital.

****Personal Interests:**

The business relates to or affects:

(a) Anybody of which you are a member or in a position of general control or management, and:

- To which you are appointed by the council;
- which exercises functions of a public nature;
- which is directed is to charitable purposes;
- whose principal purposes include the influence of public opinion or policy (including a political party of trade union).

(b) The interests a of a person from whom you have received gifts or hospitality of at least £50 as a member in the municipal year;

or

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

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

Agenda

Introductions, if appropriate.

Apologies for absence and clarification of alternate members

ITEM		WARD	PAGE
1.	Declarations of interests Members are invited to declare at this stage of the meeting, the nature and existence of any relevant disclosable pecuniary, personal or prejudicial interests in the items on this agenda and to specify the item(s) to which they relate.		
	APPLICATIONS FOR DECISION		
2.	18/0321 Former Northfield Industrial Estate & units 2-18 Beresford Avenue & Abbey Works Estate, Wycombe Road, Wembley, HA0 & Ace Corner & Capital House, North Circular Road, London, NW10	Alperton	5 - 88
3.	Any Other Urgent Business Notice of items to be raised under this heading must be given in writing to the Head of Executive and Member Services or his representative before the meeting in accordance with Standing Order 60.		

Date of the next meeting: Wednesday 15 August 2018

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- The Conference Hall is accessible by lift and seats will be provided for members of the public on a first come first served principle.

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APPLICATIONS FOR DECISION

Introduction

1. In this part of the agenda are reports on planning applications for determination by the committee.

2. Although the reports are set out in a particular order on the agenda, the Chair may reorder the agenda on the night. Therefore, if you wish to be present for a particular application, you need to be at the meeting from the beginning.

3. The following information and advice only applies to reports in this part of the agenda.

Material planning considerations

4. The Committee is required to consider planning applications against the development plan and other material planning considerations.

5. The development plan for Brent comprises the following documents:

   - London Plan March 2016
   - Brent Core Strategy 2010
   - Brent Site Specific Allocations 2011
   - West London Waste Plan 2015
   - Wembley Action Area Plan 2015
   - Sudbury Town Neighbourhood Plan 2015
   - Saved 2004 Unitary Development Plan Policies 2014

6. Decisions must be taken in accordance with section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004. Section 70(2) of the Town and Country Planning Act 1990 requires the Committee to have regard to the provisions of the Development Plan, so far as material to the application; any local finance considerations, so far as material to the application; and any other material considerations. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the Committee to make its determination in accordance with the Development Plan unless material planning considerations support a different decision being taken.

7. Under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development which affects listed buildings or their settings, the local planning authority must have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest it possesses.

8. Under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development which affects a conservation area, the local planning authority must pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area.

9. Under Section 197 of the Town and Country Planning Act 1990, in considering whether to grant planning permission for any development, the local planning authority must ensure, whenever it is appropriate, that

adequate provision is made, by the imposition of conditions, for the preservation or planting of trees.

10. In accordance with Article 35 of the Development Management Procedure Order 2015, Members are invited to agree the recommendations set out in the reports, which have been made on the basis of the analysis of the scheme set out in each report. This analysis has been undertaken on the balance of the policies and any other material considerations set out in the individual reports.

11. Members are reminded that other areas of legislation cover many aspects of the development process and therefore do not need to be considered as part of determining a planning application. The most common examples are:

- **Building Regulations** deal with structural integrity of buildings, the physical performance of buildings in terms of their consumption of energy, means of escape in case of fire, access to buildings by the Fire Brigade to fight fires etc.
- Works within the highway are controlled by **Highways Legislation**.
- **Environmental Health** covers a range of issues including public nuisance, food safety, licensing, pollution control etc.
- Works on or close to the boundary are covered by the **Party Wall Act**.
- **Covenants and private rights** over land are enforced separately from planning and should not be taken into account.

Provision of infrastructure

12. In accordance with Policy 6.5 of the London Plan (2015) the Mayor of London has introduced a London wide Community Infrastructure Levy (CIL) to fund CrossRail. Similarly, Brent Council's CIL is also payable. These would be paid on the commencement of the development.

13. Brent Council's CIL provides an income stream to the Council to fund (either in whole or in part) the provision, improvement, replacement, operation or maintenance of the following types of new and existing infrastructure:

- public realm infrastructure, including town centre improvement projects and street trees;
- roads and other transport facilities;
- schools and other educational facilities;
- parks, open space, and sporting and recreational facilities;
- community & cultural infrastructure;
- medical facilities;
- renewable energy and sustainability infrastructure; and
- flood defences,

14. except unless the need for specific infrastructure contributions is identified in the Section 106 Planning Obligations Supplementary Planning Document or where section 106 arrangements will continue to apply if the infrastructure is required to make the development acceptable in planning terms.

15. Full details are in the Regulation 123 List is available from the Council's website: www.brent.gov.uk.

16. Other forms of necessary infrastructure (as defined in the CIL Regulations) and any mitigation of the development that is necessary will be secured through a section106 agreement. Where these are necessary, it will be explained and specified in the agenda reports.

Further information

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

Public speaking

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

Recommendation

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

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COMMITTEE REPORT

Planning Committee on 18 July, 2018
Item No 02
Case Number **18/0321**

SITE INFORMATION

RECEIVED	**24 January, 2018**
WARD	**Alperton**
PLANNING AREA	**Brent Connects Wembley**
LOCATION	**Former Northfield Industrial Estate & units 2-18 Beresford Avenue & Abbey Works Estate, Wycombe Road, Wembley, HA0 & Ace Corner & Capital House, North Circular Road, London, NW10**
PROPOSAL	Hybrid planning application for the redevelopment of Northfield industrial estate: Outline planning permission for the demolition of existing buildings and structures on the site, all site preparation works and redevelopment to provide new buildings ranging from 35.75m AOD to 111.95m AOD in height, with a total floorspace (GEA) of up to 309,400 sq m (excluding basement up to 42,000 sq m GEA) to accommodate 2,900 homes (Use Class C3), business and storage and distribution (Use Classes B1a, B1c and B8), commercial (Use Classes A1, A2, A3, A4 and A5), community and leisure (Use Classes D1 and D2) including community centre and nursery, new basement level including energy centre, associated storage, cycle and vehicle parking, new vehicular accesses, associated highway works to Beresford Avenue, landscaping and creation of new public and private open space, ancillary facilitating works, various temporary meanwhile uses, interim works and infrastructure. Full planning permission for demolition of existing buildings and structures on the site, all site preparation works and the development of Phase 1 (Buildings A, B, C and D ranging from 1 to 14 storeys in height) to comprise 400 homes (Use Class C3); 910 sq m (GEA) of business floorspace Use Class B1a); 1,290 sq m (GEA) of commercial floorspace (Use Classes A1, A2, A3, A4 and A5); and 1,610 sq m (GEA) of community and leisure floorspace (Use Classes D1 and D2), including a community centre and nursery; together with new basement level including energy centre, associated storage, cycle and vehicle parking, new vehicular accesses, associated highway works to Beresford Avenue, landscaping and creation of new public and private open space, ancillary facilitating works, various temporary meanwhile uses, interim works and infrastructure.
PLAN NO'S	See condition 2.
LINK TO DOCUMENTS ASSOCIATED WITH THIS PLANNING APPLICATION	**When viewing this on an Electronic Device** **Please click on the link below to view ALL document associated to case** https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=DCAPR_138266 **When viewing this as an Hard Copy** **Please use the following steps** 1. Please go to pa.brent.gov.uk 2. Select Planning and conduct a search tying "18/0321" (i.e. Case

	Reference) into the search Box 3. Click on "View Documents" tab

RECOMMENDATIONS

To resolve to grant planning permission, subject to the Stage 2 referral to the Mayor of London and subject to the completion of a satisfactory Section 106 or other legal agreement, and the conditions and informatives recommended in this report, and to delegate authority to the Head of Planning or other duly authorised person to agree the exact terms thereof on advice from the Chief Legal Officer.

A. That the Committee resolve the GRANT planning permission subject to:

1. Any direction by the London Mayor pursuant to the Mayor of London Order
2. Any direction by the Secretary of State pursuant to the Consultation Direction
3. The prior completion of a legal agreement to secure the following obligations:
    a. Payment of the Council's legal and other professional costs;
    b. Notification of a material start 28 days prior to commencement;
    c. Join the Considerate Contractors Scheme;
    d. The provision of 35% affordable housing;
    e. To provide sustainability improvements;
    f. To provide a new healthcare facility;
    g. To provide Training and Employment opportunities;
    h. To provide Employment Generating floorspace, including Affordable Workspace;
    i. To provide Travel Plans;
    j. To provide a CPZ Contribution;
    k. To provide a Bus Service Contribution;
    l. To provide a contribution to gate line capacity improvements to Stonebridge Park Station;
    m. To restrict Parking Permits to future occupiers;
    n. To provide Highway Improvement Works;
    o. To provide a financial contribution to Public Open Space;
    p. To provide a Public Art Strategy;
    q. Any other as deemed necessary.

B. That the Head of Planning is delegated authority to negotiate the legal agreement indicated above.

C. That the Head of Planning is delegated authority to issue the planning permission and impose conditions to secure the following matters:

1. Commencement
2. Approved Plans
3. Scale, Appearance, Layout, Access and Landscaping
4. Time Limits for Reserved Matters
5. Time Limits for Reserved Matters (Time Limit)
6. List of Documentation for Reserved Matters Applications
7. Phasing
8. CIL Chargeable Plan
9. Fixed Plant Noise
10. Sound Insulation
11. Noise and Vibration
12. Land Contamination
13. Land Contamination (Remediation)
14. Private Residential Mix
15. Landscaping
16. Sustainable Urban Drainage
17. Accessibility Units

18. Compliance with London Housing Design Standards
19. Materials
20. Transport and Parking
21. Air Quality Assessment
22. Odour
23. Drainage Strategy
24. Water Supply
25. Construction Method Statement
26. Construction Environmental Management Plan
27. Waste Management Scheme
28. Construction Logistics Plan
29. Piling Method Statement
30. Ecological Mitigation
31. Estate Management
32. Play Space
33. Delivery and Servicing Plan
34. Wind Mitigation
35. The Generator (Maximum Unit Sizes)
36. The Generator (Layouts to Attract a Range of Occupiers)
37. BREEAM (Excellent) Pre-Assessment
38. BREEAM (Excellent) Post- Assessment

D. Informatives as detailed at the end of this of this report.

E. That the Head of Planning is delegated authority to make changes to the wording of the committee's decision (such as to delete, vary or add conditions, informatives, planning obligations or reasons for the decision) prior to the decision being actioned, provided that the Head of Planning is satisfied that any such changes could not reasonably be regarded as deviating from the overall principle of the decision reached by the committee not that such change(s) could reasonably have led to a different decision having been reached by the committee.

F. If the legal agreement has not been completed prior to the target determination date of this application the Head of Planning is delegated authority to refuse planning permission.

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

SITE MAP

Planning Committee Map

Site address: Former Northfield Industrial Estate & units 2-18 Beresford Avenue & Abbey Works Estate, Wycombe Road, Wembley, HA0 & Ace Corner & Capital House, North Circular Road, London, NW10

This map is indicative only.

PROPOSAL IN DETAIL

Overview

The application is a hybrid scheme for redevelopment of the site. , submitted part in outline and part as a full application for planning permission. The proposals for the majority of the site are submitted in outline with all matters reserved, although Phase 1 at the north-west part of the site is submitted in full.

The application proposes demolition of all existing buildings on the site and the delivery of a mixed-use development delivering:

- 2,900 homes including 1,015 affordable homes (35% by habitable room),
- up to 2,300sqm commercial floorspace (Use Classes A1-A5),
- A minimum of 17,581sqm and up to 19,000sqm employment floorspace (Use Classes B1a, B1c and B8),
- up to 2,900sqm community and assembly and leisure floorspace (Use Classes D1 and D2),
- an energy centre,
- public and private open space,
- new routes and public access along the River Brent and Grand Union Canal,
- parking and cycle parking provision, including within a basement level, and
- new site access and ancillary infrastructure.

The detailed element of the application forming Phase 1 comprises four buildings (A, B, C and D) and would deliver a total of 400 dwellings, 1,290sqm commercial floorspace (Use Classes A1-A5), 910sqm employment floorspace (Use Class B1a) and 1,610sqm community and assembly and leisure floorspace (Use Classes D1/D2). This part of the site would accommodate a community centre and nursery with a retail hub formed around a canal-side piazza with areas of public realm and open space. Parking would be provided for 256 cars, 726 cycles and 18 motorcycles.

The outline element of the application proposes nine building plots (E, F, G, H, J, K, L, M and N). These would deliver up to 2,500 homes together with approximately 5,000sqm ground floor workspace (Use Class B1c) at the eastern part of the site, and 13,100sqm light industrial or industrial workspace or warehousing and distribution (Use Classes B1a, B1c and B8) within a multi-storey light industrial building known as 'The Generator' to the south of the River Brent. Parking for the outline element would be provided for 1,335 cars, 33 vans, 3 HGVs, 4,518 cycles and 63 motorcycles.

The outline element of the development is defined through a Development Specification document and through Parameter Plans setting out the following:

- Planning Application Boundary Detailed and Outline Components,
- Proposed Lower Ground Floor Extent,
- Proposed Ground Floor Plot Extent,
- Proposed First Floor and Above Plot Extent,
- Proposed Movement Plan within the Site,
- Proposed Building Heights,
- Proposed Open Space, and
- Proposed Ground Level Heights.

In addition to the Development Specification document and Parameter Plans, a Framework Design Code supports the outline application and together these form the controlling documents. These set out the parameters and limits that would inform all future Reserved Matters applications.

The submission includes an Illustrative Masterplan which indicates how the outline development could be delivered. However, this masterplan is illustrative only. This application, does not seek approval for the detailed design or external appearance of buildings or landscape proposals within the outline application area, which would be the subject of future Reserved Matters applications that would be made in accordance with the established parameters for the outline development.

The Masterplan

The masterplan seeks to provide for the redevelopment of this industrial site with a high density, residential led mixed use development. It will provide 2900 homes, employment floorspace, community, retail and leisure facilities and includes both a health centre and an energy centre. To support the incoming residents and workers, and to enhance the wider community, the proposal includes improved pedestrian, cycling and vehicular connections (including improved access to public transport); publicly accessible spaces (including the provision of level access), will open up the Grand Union Canal, and River Brent to the public; and provide a range of green spaces, open spaces and formal/informal play areas.

Uses

The application proposes a mixed use development, with homes and employment space, together with commercial, community, health and leisure space and areas of public realm. The total amount of floorspace proposed within this application is 309,400sqm gross external area (GEA), excluding the basement (1,528 spaces of car and cycle parking) of up to 42,000sqm.

To allow flexibility in the delivery of the development across the site, the proposed level of floorspace for each use has been expressed as a maximum amount. The application also proposes a flexible approach to the distribution of commercial and community and assembly and leisure floorspace over time by establishing minimum and maximum floorspace figures. This has been sought by the applicants, and agreed in principle by officers to provide flexibility to respond to market conditions and ensure the full occupation of space.

Although the aggregate total of the maximum floorspaces would exceed the total floorspace applied for it would not be possible to reach the maximum permitted floorspace for both the commercial and community and assembly and leisure uses, and therefore this overall total would not be exceeded. In order to comply with regional and local policy there are minimum quantums of floorspace proposed, which would be the lowest amount of this type of floorspace the applicants could deliver through their reserved matters applications. This would be monitored on an application by application basis to ensure the minimum quantums of floorspace as stipulated are being delivered.

The proposed uses and their minimum and maximum floorspaces are detailed below:

Use Class	Detailed Element	Minimum Total	Maximum Total
C3 Residential	38,010sqm	283,000sqm	283,000sqm
B1a, B1c and B8 Commercial Employment	910sqm	19,000sqm	19,000sqm
A1-A5 Commercial	1,290sqm	1,600sqm	2,300sqm
D1 and D2 Assembly and Leisure/Community	1,610sqm	1,900sqm	2,900sqm
Ancillary non-residential floorspace (including parking, bins, storage and plant)	400sqm	2,900sqm	2,900sqm
Basement	7,240sqm	42,000sqm	42,000sqm

Within the Phase 1 detailed element of the development:

- Buildings A and B would provide 92 homes (to be delivered as Affordable housing)
- Building C would provide 720sqm of community facilities with a nursery and a new

community centre (Use Classes D1 and D2) at ground floor level, and 45 new homes above.
- Building D would provide 1,290sqm commercial space (Use Classes A1-A5), 910sqm employment space (Use Class B1a) and 263 homes together with leisure facilities and associated works, and an energy centre to be located at basement level.

Within the outline element of the development:
- Building Plots E-M would provide homes, together with commercial space (Use Classes A1-A5) and assembly and leisure space (Use Classes D1 and D2) at ground floor.
- Building Plot L would provide employment space (Use Class B1c) at ground floor level with homes above.
- To the south of the River Brent, Building Plot N (the Generator) would provide employment floorspace (Use Classes B1c, B2 and B8).
- The location of the health centre is still to be agreed
- Creative Quarter - would provide flexible meanwhile use workspaces during the construction phase.

The single basement proposed at lower ground floor level would provide space for car parking, cycle parking, bin storage and plant to serve the development and has capacity of around 1,477 car parking spaces (including 85 disabled spaces) and cycle storage areas, as well as access cores to the floors above, internal access ramps and the energy centre to be beneath Building D.

Building Plots, Streets and Open Spaces

The submission includes 13 building plots which are located within four 'Character Areas'. These share common characteristics, but would each have a distinct character as a result of the materials, elevational treatment, massing, use and function of the component buildings and spaces. Details of these material palettes would be contained within the final Design Guide, secured under Condition 20.

The series of buildings across the site would be of varying height and scale, and would be arranged around a hierarchy of streets that connect through and across the site to form a network.

Up to 4.6ha of public realm would be delivered including three core public open spaces at the 'Central Gardens' (0.6ha), 'Riverside Meadows' (up to 0.83ha) and 'Canalside' (up to 0.76ha). The remainder is distributed around the site.

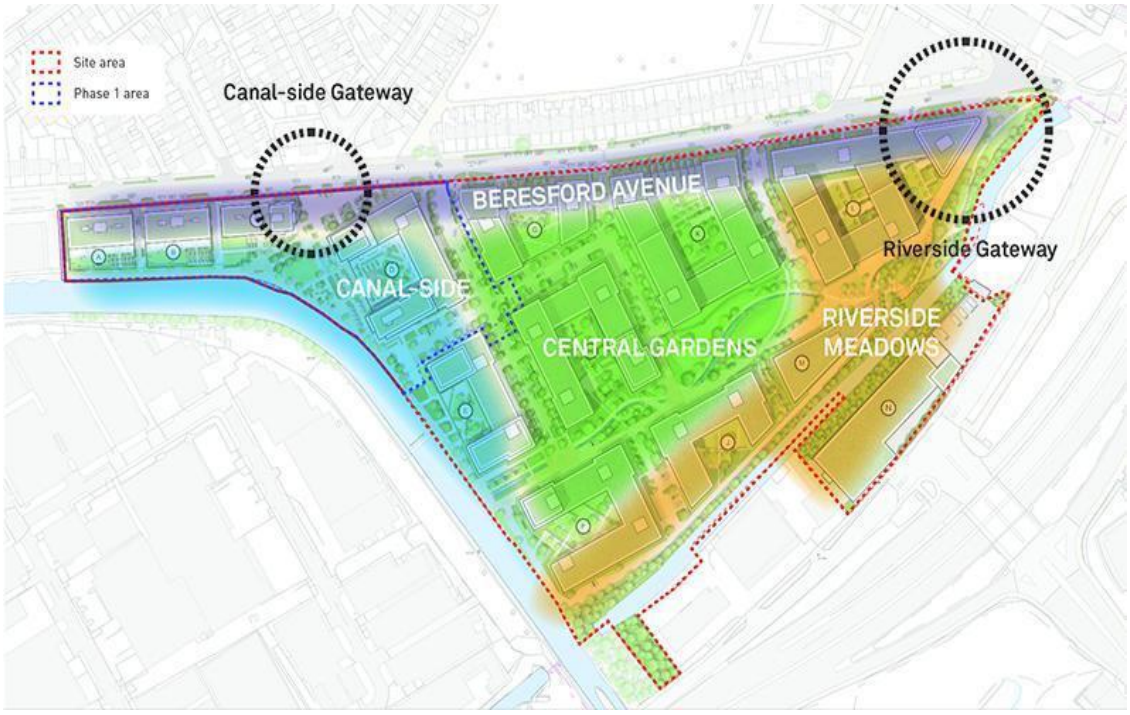

Fig 1: Character Areas

Beresford Avenue Character Area
At the northern edge of the site, the Beresford Avenue Character Area is characterised by lower building heights responding to the dwellings to the north and includes active uses at ground floor levels including residential front doors fronting Beresford Avenue, the Community Centre and nursery with dual frontages fronting both Beresford Avenue and the 'Canal-side', and commercial uses (including a Use Class D2 unit which could be a gymnasium) at the ground floor level of Building D which fronts Beresford Avenue, the 'Canal-side' and adjacent streets.

Canal-side Character Area
The Canal-side Character Area at the west of the site is designed to provide a gateway to the site and provide a centre of activity for recreation, leisure and retail such as cafes/restaurants. The character is of wharf-style buildings and formal landscape areas, with a design based on typical north-west London canal edges.

Central Gardens Character Area
The Central Gardens Character Area to the central part of the site incorporates landscaping with an indicative water feature (details to be provided in a relevant Reserved Matters application) providing the focus for surrounding buildings. Architecturally, there would be references to the wharf-style buildings on the canal, although this would be softened by use of lighter materials and larger window openings.

Riverside Meadows Character Area
The Riverside Meadows Character Area at the south east part of the site provides for residential and employment uses. Landscaping would be more informal, and the architecture would also be informal with variation to roof levels and softer materials. Fronting the roadside, the architecture would be more robust respecting the scale of buildings along the North Circular Road.

Heights
The heights of the proposed buildings vary, with the application proposing heights for the outline element of the development as the range from the maximum height of the lowest part of the building to the maximum height of the highest part of the building (m above ordnance datum (AOD)) providing a range of 35.75m AOD up to 111.95m AOD at the eastern gateway of the site. These heights are in relation to occupied floorspace. As such, plant may project beyond these, although this would be by no more than 3m and would be set back from the parapet.

The proposed building heights are generally low along Beresford Avenue, and gradually step up towards the eastern part of the site where the tallest building would be located as a marker at the eastern gateway. Along the Canalside, stepped building heights are proposed which increase in height from south to north and from west to east, with a second marker building at the bend of the canal.

Character Area	Heights Range	Above Ground Height
Beresford Avenue	Around 3 to 25 storeys, with the buildings fronting Beresford Avenue generally 5 storeys, stepping up to 8 at the gateway between Buildings C and D and 25 storeys on the corner of Building L.	13.4 - 84.55m
Canal-side	Around 1 to 14 storeys. The building steps from 10 to 14 storeys along the canal side from Building F to Building D, with single storey podiums to Buildings A, B and D.	4.65 - 47.4m

Central Gardens	Around 1 to 20 storeys. Building heights would be relatively consistent, although there would be a landmark tower provided at the western end of around 25 storeys. Heights range from 1 - 20 storeys. Generally 10 storeys, stepping down to 8 storeys as the character area approaches Beresford Avenue, with a 20 storey element on the SE corner on Building H acting as a marker to the Central Gardens.	6.95 - 67.1m
Riverside Meadows	Around 1 to 12 storeys.	8.35 - 41.6m

Access and Connectivity

To support increased connectivity, the development includes new pedestrian and cycle connections from Beresford Avenue to the site, and a potential route for a new bridge over the River Brent between the north and south parts of the site, and the Grand Union Canal to the east and west (land would be safeguarded under the Section 106 agreement to ensure this could be brought forward at such time that the sites on the other side of the Grand Union Canal come forward for redevelopment). The building plots would be arranged around a network of new streets and pedestrian/cycle paths. In addition to the access for pedestrians and cyclists, vehicular access would be provided at four locations from Beresford Avenue, and two locations from the Old North Circular Road which would serve the southern part of the site only.

The development also proposes improvements to Beresford Avenue including new footpath and cycle paths, crossings, landscaping, increased carriageway width and relocated bus stops to improve the pedestrian and cycle environment and traffic flow. Improvements are also proposed to the route to Stonebridge Park station along the section of the Old North Circular Road between its junctions with Beresford Avenue and Argenta Way. The pedestrian and cycle improvements proposed would result in delineated shared surfaces, allowing for an uninterrupted cycle/pedestrian route from Beresford Avenue, up to Stonebridge Park Station.

Interim Works

The application also proposes interim works covering site preparation and temporary works. These include the demolition of all existing buildings and structures; surveys; site clearance; archaeological works; ground investigation; remediation; the erection of fencing or hoardings; the provision of security measures and lighting; the erection of temporary buildings or structures associated with the development; the laying, removal or diversion of services; construction of temporary access; temporary highway works; and temporary internal site roads.

Meanwhile Uses

The application also proposes provision of meanwhile uses on the site during the development process. Details of these are being developed and would be secured through the S106 Agreement. To secure the early delivery of employment floorspace on the site the Council is seeking the provision of a temporary ‘Creative Quarter’ towards the start of the construction period that would provide small, flexible workspaces offering seed bed units or incubator space for start-up businesses and entrepreneurs. The potential to set up a training facility for construction to be co-located alongside the site welfare and canteen facilities to create a hub is also being investigated.

Indicative Timing of Development

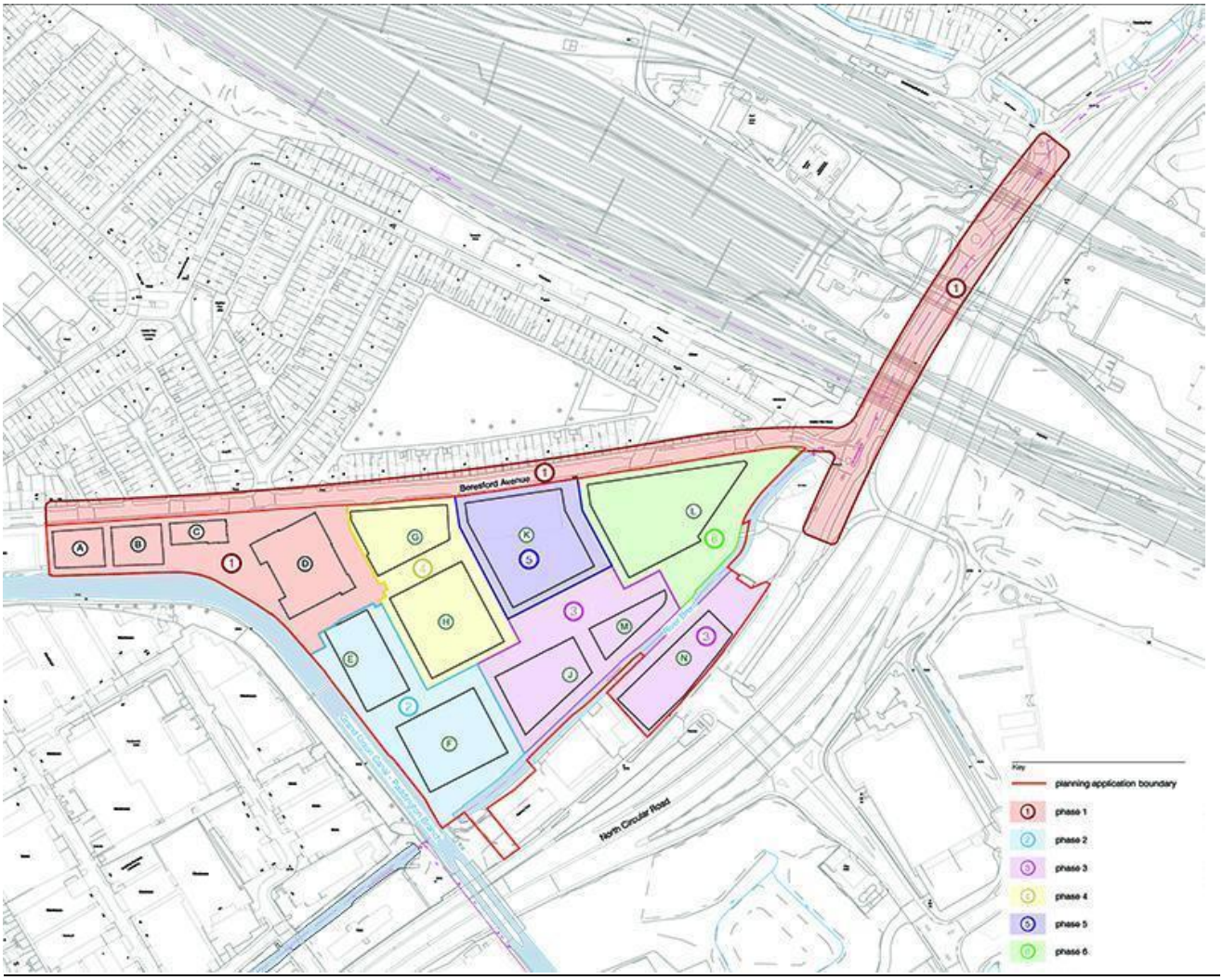

Fig 2: Phasing

Given the scale and lengthy build out times for the phases, it not possible to accurately set the total period of construction or the sequence of phasing for plots. However, indicative information has been provided regarding the indicative timescales for delivery and phasing of plots.

The development is expected to be constructed over a period of 19 years, commencing in 2019 with completion by 2038. The indicative phasing plan is as follows:

Phase	Plots	Approximate Duration	Completion Year
1	Building Plots A, B, C and D	3 years and 9 months	2022
2	Building Plots E and F	5 years and 1 month	2026
3	Building Plots J, M and N	3 years and 11 months	2029
4	Building Plots G and H	5 years and 1 month	2032
5	Building Plot K	4 years	2034
6	Building Plot L	4 years and 9 months	2038

This is illustrative and the exact detail and timing of phases may be subject to change

EXISTING

The application site is located to the south of Beresford Avenue and north of the A406 North

Circular Road at the east of Alperton. The Grand Union Canal runs to the south western edge of the site, and the River Brent runs through the site, dividing it into two parcels. The site has a total area of 9.16ha, the majority of which is to the north of the River Brent (8.1ha), while the smaller southern part has an area of 1.06ha.

The majority of the site (with the exception of a small area at the north-west) is part of the Park Royal Strategic Industrial Location (SIL) as designated by the London Plan. The north-west part that is not SIL land is a non-designated Local Employment Site in accordance with the Brent Development Management Policies document.

The site is wholly within the Alperton Housing Zone designated by the Mayor of London, and the north-west part of the site is also part of the Alperton Growth Area as identified within the Brent Site Specific Allocations document and the Alperton Masterplan. To the south of the site is the boundary of the Old Oak and Park Royal Opportunity Area identified by the London Plan and Old Oak and Park Royal Opportunity Area Planning Framework SPG.

There are no conservation areas or listed buildings within or adjacent to the application site. The nearest listed building to the site is the Grade II listed "Brent Viaduct" over the North Circular Road (listing number 1078890). The River Brent and Grand Union Canal are each designated as Sites of Importance for Nature Conservation (SINC), and the southern and western parts of the site are designated as 'Waterside Development' within the Brent Development Management Policies document.

The site comprises brownfield land which was formerly in use as an industrial estate, most recently accommodating a range of low density uses such as car workshops, car dealers, storage, and industrial uses. Much of the site has previously been cleared (and used as open air storage) and comprises areas of hardstanding, although there are some vacant predominantly single and two storey commercial buildings to the centre and western part of the site, and three industrial units remain along Beresford Avenue and are currently occupied under different ownership. There is also a temporary information centre with associated parking that is accessed from Beresford Avenue towards the west of the site. This was created on site in 2017 (under application reference 17/2380) in order to support the redevelopment proposed by the current application, including through providing space to host community engagement events.

The site has a varying Public Transport Accessibility Level (PTAL) rating, with a rating of 0 (very poor) for limited areas at the west of the site, increasing towards the east to a rating of 3 (moderate). Stonebridge Park station is approximately 0.3km (as the crow flies) and a 1km walk along Beresford Avenue and the Old North Circular Road to the north east of the site and Alperton Underground station is approximately 0.9km (as the crow flies) and a 1.5km walk along Mount Pleasant and Ealing Road to the west, and there are local bus stops on Beresford Avenue and the North Circular Road.

To the north of the site on Beresford Avenue is two-storey semi-detached and terraced housing with the former Rizla factory building (which makes a positive contribution to the streetscene) towards the north east. Tot the east of the site is the Ace Café, while to the south and west are existing industrial uses.

SUMMARY OF KEY ISSUES

The key planning issues for Members to consider are set out below. Objections and letters of support have been received regarding some of these matters. Members will have to balance all of the planning issues and objectives when making a decision on the application, against policy and other material considerations.

- **Comments received:** 18 comments have been recieved, consisting of 12 objections

principally raising concerns regarding scale & design, loss of light, transport and access impacts and a lack of supporting facilities & local businesses. 3 letters of support were sent in relating to the positive employment proposals, provision of open space and connectivity.

- **Principle of land uses**, specifically the provision of a high level of residential accommodation on a designated SIL site in a Housing Zone, and the quality of the employment floorspace provided. The residential use is strongly supported through the Alperton housing zone designation in this area.
- **The reprovision of employment generating uses** and workspace, including the provision of a high-density purpose built B1(c)/B8 development, along with additional B1(c)/B8 and B1(a) floorspace across the development which would result in no net loss of employment floorspace as a result of the proposal. The proposals are considered to be in accordance with national, regional and local policies.
- **Design and Layout:** The approach to the design and layout of the buildings and public spaces within the three proposed character areas results in a coherent and legible masterplan. While it is acknowledged the proposed development would include elements that are significantly taller than the surrounding residential properties, it is considered that the proposed building heights step away from the more sensitive lower level buildings in a logical manner that would protect existing residential amenity, and would be appropriate for the future context of the site, and necessary for the provision of a high quantum of good quality residential accommodation.
- **Heritage:** there are no designated or non-designated heritage assets located on the application site. While there is one non-designated heritage asset located to the north of the application site, and a Grade II listed railway viaduct 500m to the north-west, the proposed development would have no material impact.
- **Landscaping, Open Space & Trees:** Some existing trees are proposed to be removed but they are not considered worthy of retention. The proposal includes extensive landscaping and open space provision which would result in net improvements to both the quality and quantity of the landscaping and open space in the area, to the amount of publicly accessible open space in the area and to the ecological value of the application site.
- **Transportation & Highways:** the development will result in increased use of the road network by vehicles, cyclists and pedestrians. However, the scheme includes improvements to Beresford Avenue and the route to Stonebridge Park Station. The impact on the road network has been assessed by Brent and TfL, who consider the proposed Transport Assessment to be acceptable, subject to agreed mitigation measures.
- **Affordable Housing & Financial Viability:** 35% (by habitable room) would be provided on a policy compliant tenure split (70% affordable rent, 30% intermediate). The applicants viability assessment has been tested by the Council's independent advisors and it has been demonstrated to officer's satisfaction that this is the maximum reasonable amount that can be provided on site. The applicants have agreed to the Council's requirements with regard nomination rights, and for the timing of delivery of the affordable units. The requirements of affordable housing obligations are considered to have been met.
- **Quality of accommodation:** The proposed residential accommodation would meet all national, regional and local planning policy and guidance with regard to internal layouts and room sizes. The proposed residential units would have acceptable access to outlook, daylight and sunlight.
- **Dwelling Mix:** The mix of units is in accordance with the standards within the London Plan and closely aligned with the Alperton Masterplan mix, and would provide a suitable quantum of family sized accommodation.
- **Amenity Space:** The proposed private amenity space complies with the Mayor's guidance, however fails to comply with Brent Development Management Policies with regard to the quantum of private amenity space provided per unit. However, due to the provision of a significant quantum of usable public outdoor space, and an off-site contribution for improvements to playspace within the vicinity of the application site, it is considered that the proposed development would provide an acceptable amount of both private and public open space.
- **Neighbouring amenity:** There would be a loss of light to some windows of surrounding

buildings, which is a function of a development on this scale. However, the overall impact of the development is considered acceptable, particularly in view of the wider regenerative benefits including the provision of a significant number of new homes.

- **Energy and sustainability:** The measures outlined by the applicant achieve the required improvement on carbon savings within London Plan policy. The proposed development would deliver efficient water use for residential units, and conditions will require further consideration of carbon savings prior to implementation, along with BREEAM 'Excellent' certification for non-residential floorspace.
- **Accessibility:** the site has a varying PTAL from 0 to 3. To justify the high density of the scheme this needs to be increased. As a consequence of the improvements to busses and the route to Stonebridge, the PTAL will increase to around 3 across the application site.
- **Density:** While it is acknowledged that the proposed development would have a significantly higher density to that of the existing residential areas to the north of the application site, and that the existing PTAL of 0 - 3 across the site is low, the proposed development would make significant financial contributions through the proposed Section 106 agreement (in agreement with TfL) to provide additional bus services, along with significant walking and cycling improvements to the nearby Stonebridge Park Station. It is considered that the proposed layout and scale of the development is acceptable and would provide a good standard of residential accommodation being achieved, and the applicants have demonstrated to both the Council and Transport for London that the proposed development would have an acceptable level of impact on the existing surrounding occupiers, while delivering much needed homes and employment opportunities.
- **Planning Obligations and Community Infrastructure Levy (CIL):** CIL liability is calculated at the time at which planning permission is granted. As such, the CIL liability specified within this report is based on current levels of indexation and is provided for indicative purposes only. The proposed Section 106 agreement is discussed in this report.

RELEVANT SITE HISTORY

This section of the report sets out the key planning applications and consents relating to this site.

Car Park Entrance, Northfields Estate
17/2380 – TEMPORARY APPLICATION – Granted 8 August 2017
Erection of a single storey building for a temporary period of 5 years for use as an Information Centre (Sui Generis Use) with associated landscaping and car parking.

18/1156 - TEMPORARY APPLICATION – Granted 8 June 2018
Extension of the existing temporary single storey information centre building (use class Sui Generis) to accommodate a marketing suite (use class Sui Generis) with associated landscaping, for a period of up to 5 years.

CONSULTATIONS

Initial neighbour consultation: 1,281 consultation letters were sent to adjoining and nearby owners and occupiers on 5 February 2018.

The application was advertised in the press on 15 February 2018 and site notices were posted on 3 February 2018.

Additional consultation: The application was re-advertised as an application accompanied by an Environmental Statement in the press on 10 May 2018 and by site notices posted on 8 May 2018.

A total of 18 public responses have been received, with 6 of these indicating support for the application or making general comment on the proposals and 12 objections.

The grounds of objections received refer to the following issues:

Comment	Response
Principle of Development (Para 5)	
Lack of a shopping centre in the area, and alternative uses of land would be more beneficial and create employment opportunities.	Development of a large shopping centre in this location would not comply with adopted national, strategic and local planning policy frameworks which direct such facilities to existing town centres, such as Ealing Road or Wembley. The site is mainly vacant currently. The development provides for a regeneration with a mix of employment, commercial, community and leisure uses and open space, alongside new homes contributing to housing targets and affordable housing provision. The uses proposed would make effective use of the site and support a sustainable community, provide increased local choice and generate a substantial number of new jobs (approximately 650) together with much needed new housing.
The proposed 'Generator' prevents access to the site from the North Circular.	There is no existing access to the western part of the site directly from the North Circular Road and the River Brent is situated between the site of the proposed 'Generator' and the remainder of the site. The southern part of the site is designated as SIL and there is an expectation that this land is redeveloped for intensified employment use, rather than for road access. The TfL response to the application also confirms that it would not support the creation of a new vehicular access to the south of the site from the Old North Circular Road. As considered further within the transport section of the report, the proposed access points located off Beresford Avenue are considered to be appropriate.
Boundary of the site is disputed and ownership would prevent building of the 'Generator'.	The applicant has complied with notice and consultation requirements in accordance with relevant legislation and do not believe there to be any third party land ownership issues that would preclude the delivery of the development. That being noted, it would be considered a 'civil matter', and the LPA is confident the development could be brought forward.
Impact on Businesses (Noise, Para 138, Para 216)	
New homes proposed would impact on existing businesses through restrictions over noise or operating hours	The potential impact of existing land uses, including existing industrial uses and businesses within the surrounding area has been considered by the applicant and it has been demonstrated that noise impacts on the majority of the site would be negligible. Mitigation measures are identified where dwellings could be affected ensuring adequate amenity without undue restriction on surrounding businesses The proposals is also likely to increase local demand for goods and services, supporting growth of local business. A condition requiring details of the sound attenuation to protect against externally generated environmental

	noise to be submitted and approved is proposed.
Impact on Infrastructure (Para 25, 29, 116)	
Existing schools and doctors' surgeries are full and Council would need to consider responsibility to provide school places, GP services, hospitals and other services.	The social infrastructure needs of the development are considered, and the development includes a community facility, children's nursery and health clinic which would provide services to both the new and existing communities. In addition, significant contributions would be secured through the Community Infrastructure Levy.
Character (Para 72)	
Built-up, dense, overcrowded environment would be contrary to open character of quiet neighbourhood	There is a planning policy requirement to make the best use of previously developed land in urban areas for new homes, particularly where there is good accessibility to public transport and where higher density development is considered to be appropriate. It is considered that the proposed development would be an efficient use of the available land. The development includes substantial areas of open space (private, semi-private and public), and the scale and massing of development would be appropriate in relation to the surroundings. It is considered that the proposals would not result in an overly dense or overcrowded environment (with open space being compliant with the London Plan), and would make effective use of land to transform the site and contribute positively to the existing built environment. The design approach has also been supported by an independent Design Council review.
More could be done to create high quality public realm, open up access to the canal and allow active use. The development should indicate what facilities it is intended would be provided for water-based activities.	The canalside is a key feature of the proposals which would open up the canal and create a waterside destination including through new publicly accessible frontage to the canal and a walkway, providing a vibrant space with continuous activity. The development would reconnect the surrounding neighbourhood and the canal, and makes effective use of the previously developed site and its relationship with the canal.
Proximity and height of buildings would impact on canal and canal-side spaces.	The development would overlook the canal, assisting with natural surveillance of the waterside. The height and location of development would help to draw people to the canalside and provide a focal point and visual interest. Potential effects on daylight, sunlight and overshadowing are considered and indicate that canalside areas would benefit from good sunlight availability. The development is considered to respond appropriately to its canal-side location and would enhance the waterside environment.
Impact on Amenity (Para 146)	
Overlooking and loss of light to Beresford Avenue.	The proposed scale and massing of development to Beresford Avenue respects the scale of houses along Beresford Avenue and the siting of built form provides generous separation with the tallest part of the development fronting employment uses. Effects on daylight, sunlight and overshadowing have

	been considered, and given the design and significant separation of development from neighbouring occupiers, the proposals would not result in an unduly detrimental impact on neighbouring amenity while making best use of previously developed land in an urban area with good access to public transport.
Development would cause noise, disturbance and risk of crime.	The application identifies necessary noise mitigation measures and demonstrates that predicted noise levels would be acceptable. The proposals have been designed with Secure by Design principles and so would maximise natural surveillance, deter criminal behaviour and create pleasant walking routes resulting in substantial enhancement over the existing situation.
Traffic and Transport (Para 162)	
Development would cause traffic congestion, access and parking problems.	See transport section of the report.
Overcrowding of public transport, and additional bus capacity should be provided.	See transport section of the report.
Impact on pedestrian safety	Improvements to Beresford Avenue and the link to Stonebridge Park station would improve pedestrian and cycle facilities and safety, including crossing facilities.
Impacts on traffic and transport network during construction.	Conditions are attached to all major development proposals to mitigate construction impacts, including through management of construction and associated traffic, and development would not result in undue harm.
Housing (Para 37)	
Not enough properties available at prices that would be affordable to ordinary people on average earnings. Council should insist on substantial amount of properties to be available to rent to Council tenants.	The development includes 35% Affordable Housing comprising Affordable Rent and Shared Ownership homes. All affordable rent homes would be let at affordable rents capped at the Local Housing Allowance Cap.
Environmental Impacts (Para 227)	
Ace Café is in flood risk area which must be resolved.	The Flood Risk Assessment demonstrates that more flood storage would be provided on the site than currently exists and the development would not increase the risk of flooding. The Environment Agency have not raised an objection on flood risk grounds.
Development would cause air and noise pollution, and site suffers from soil contamination.	The application demonstrates that there would be no significant impacts arising from the development so as to result in undue harm in respect of noise and air pollution. Conditions will be attached relating to soil contamination in line with standard practice.
Phasing (See 'Meanwhile Uses')	
Employment units at south should be developed sooner to provide work opportunities alongside new homes.	In addition to the 'Generator' employment space to the south, the applicant is working to develop a meanwhile strategy for the site with an aspiration to create a temporary 'Creative Quarter' for during the construction period. There would also be additional opportunities for

	employment within construction of the development and the commercial space to be delivered as part of the first phase of development.
Completion date of 2038 would be unacceptable and timescale would do nothing to address the housing shortage in the area and would be an eyesore for neighbours.	The construction timetable that has been provided is indicative. New homes, including affordable homes, would be delivered as part of each phase meeting housing needs. The construction period reflects the large-scale brownfield nature of the site and requirement for supporting works and approvals. However, conditions are attached to all major development proposals to mitigate construction impacts and development would not result in undue harm.

The reasons for supporting the scheme included praise for the local community support and inclusions in the consultation process, the provision of affordable housing and new local facilities.

CONSULTEES

Brent Environmental Health
No objection. Conditions recommended included:

- Air Quality (Dust) Risk Assessment
- Construction Environmental Management Plan (CEMP)
- Construction Method Statement
- Emissions from construction vehicles
- Internal Noise Levels
- Noise from Plants
- Non Road Mobile Machinery
- Wheel Washing Facilities
- Generator plants
- No Burning of any material
- Skips, chutes and conveyors shall be completely covered

The Land contamination officer has no objection. Submitted reports provide comprehensive review of previous investigations. Conditions recommended to require updated risk assessment in line with current guidance and further details of contaminated land remediation and verification.

Brent Highway Authority
No in principle objection. However, clarification is required in relation to details submitted as part of the application and revisions should be made to servicing arrangements. Beresford Avenue improvements should be reviewed and design concerns addressed. Parking provision would comply with maximum standards, although disabled parking provision should be amended to 10% in phase 1, and additional cycle and electric vehicle parking required.

Requirement for completion of strategic highway modelling and identification of proposed mitigation measures, and for review of public transport assessment.

S106 contributions are sought for improvements to rail stations and upgraded bus services, and for implementation of a CPZ. Conditions are recommended.

These matters have been addressed by the applicant. See Transport section of the report for detailed discussion.

Canal & River Trust
Design changes are requested to the layout of development, proposed engineering works to the

canal wall and impact on the canal. Conditions are also requested relating to landscaping, piling and construction works and management and drainage.

The trust also indicates that landowner approval would be required for works to the canal.

Environment Agency
No objection raised.

Greater London Authority (GLA)
The application is referable to the Mayor of London under the provisions of the Town & Country Planning (Mayor of London) Order 2008, as a development that provides more than 150 homes; development that is outside of Central London and has a floorspace of more than 15,000sqm; development that includes the erection of a building of more than 30m high outside of the City of London; and development that occupies more than 4ha or land in use for a use within Class B1 (business), B2 (general industry) or B8 (storage or distribution) use.

The GLA Stage 1 response states that in view of the evidenced, plan-led approach to SIL consolidation and release, the redevelopment of the site to provide a significant amount of housing and replacement industrial floorspace is strongly supported. While the application is generally acceptable, the application does not fully accord with London Plan Policy although possible remedies are identified that could address this:

- Employment: The proposed re-provision of enhanced industrial floorspace is strongly supported, and appropriate controls must ensure that the identified floorspace remains in industrial-type use.
- Housing: 35% affordable housing would be provided but in light of the industrial use of the land the proposal does not meet the Fast Track Route and further interrogation of the applicant's viability assessment is necessary to ensure that the scheme is delivering the maximum amount of affordable housing.
- Urban design: The master planning principles, layout and approach to scale and massing are supported. However, further refinements and revisions are required, and details of the design and noise mitigation for Block L are requested.
- Climate change: Further clarifications and revisions are required to the energy assessment to verify the carbon savings proposed.
- Transport: A robust highways impact assessment is needed and s106 contributions to mitigate against the proposals' impact on public transport, reduced car parking, increased cycle parking and revisions to the proposals on Beresford Avenue are required.

The applicant has responded to the issues raised by the GLA within the Stage 1 response and this has been discussed within the relevant sections of the detailed considerations section of this report.

Historic England
No objection. The development is unlikely to have a significant effect on heritage assets of archaeological interest and no further assessment or conditions are necessary.

London Underground Infrastructure Protection
No comment to make on application.

Natural England
No objection. The proposal is unlikely to affect any statutorily protected sites or landscapes. The application may provide opportunities to benefit wildlife and to enhance character and local distinctiveness.

(See Ecology and Nature Conservation section of the report for detailed discussion).

Old Oak and Park Royal Development Corporation (OPDC)
No objection. There is overall support for the principle of development although OPDC suggest that parking should be reduced and that employment provision within Block L is phased earlier. Confirmation that health and education impacts would be addressed is also requested. Opportunities for integration with Park Royal area should be considered and connectivity enhanced.

Sport England
Objection (as a non-statutory consultee). Revisions requested to layout and scale of public spaces, and detail of sport and recreation uses that would be supported requested. Linkages between site and nearby recreation facilities should be increased and greater focus on walking and cycling.

Brent should consider supporting needs for sports facilities arising from development.

Thames Water
No objection. Recommend that conditions are attached related to drainage infrastructure and details of piling works.

Transport for London (TfL)
There was an initial objection on 5th March 2018, due to concerns about the design of the link improvements, parking provision (including disabled and cycle parking). TfL requested to view the strategic highway modelling and proposed mitigation measures within a revised public transport assessment. Initial S106 contributions were sought, along with recommended conditions.

A further response was received on 28th June 2018, and updated on the 5th July 2018:

The strategic highway modelling has been completed to TfL's satisfaction and they formally confirm the acceptability of the strategic modelling.

TfL have confirmed that having taken account of the development proposed, its location and intended programme for delivery together with the assessment work undertaken to date that the transport heads of terms for the Section 106 as proposed by St George, and agreed in principle by the London Borough of Brent with regard to highways, and the obligations in relation to Stonebridge Park Station, bus improvements and improvements to Beresford Avenue, that the scheme is acceptable to TfL as part of a package which they consider to adequately and appropriately mitigates the strategic impacts of the development.

TfL have also confirmed that the Transport Assessment undertaken on behalf of St George (including the strategic highway modelling) is considered to be sufficient to enable appropriate assessment of the impacts of the development, subject to more detailed work to feed into the detailed design of specific and necessary local mitigations (to be secured in the S106 agreement).

TfL would need to be included as a signatory to the section 106 Agreement, and reasonable legal costs would also need to be covered as part of this Agreement. This has been agreed by the applicant.

(See Transport section of the report for detailed discussion).

Brent Council Education
The Northfield industrial estate is situated in the south of the borough, on the northern borders of the North Circular Road – Primary Planning Area 3. The population yield is based on approximately 2900 housing units for all ages and the whole development is due to be complete by 2037.

In phase 1 and 2 which covers the next decade approximately 762 units are scheduled to be built

which could yield approximately 800 school age children - 450 primary aged pupils (Reception to Year 6) and 350 secondary aged pupils (Year 7 to Year 11).

Using the January 2017 GLA projections this could lead to a shortage of primary places in this region (planning area 3) however there are surplus places in schools further afield that would absorb this, albeit they are situated on the other side of the North Circular Road (planning area 4). [It must be noted that the January 2017 projections already accounted for 1331 of the 2900 units in the housing trajectory therefore the additional balance totals 1569 units]. The closest schools with current capacity include Elsley Primary- planning area 3, also Stonebridge Primary and Harlesden Primary schools both of which are on the southern side of the North Circular Road – planning area 4.

There would be a definite shortage of secondary places across all year groups in this region of the borough at around 2022/23, the nearest secondary schools being Ark Elvin Academy and Alperton Community School, both of which have been recently rebuilt with additional capacity to meet current demand. It is anticipated that at least one additional form of entry would be required in addition to those which would be required to meet current forecast expectations in Year 7 – see the table below which shows anticipated additional capacity required across the borough:

2020/21 = 4FE
2021/22 = 8FE
2022/23 = 11FE
2023/24 = 6FE
2024/25 = 5FE

Brent Lead Local Flood Authority
The main site falls within Flood Zone 1 and the risk of flooding is low. The River Brent is in very close proximity and the flood risk is high at this location. The development floor levels would be much higher than the flood level. The developer are reducing the surface water discharge from 2200 l/sec to 125 l/sec and this would reduce the flood risk in this area. The Lead Local Flood Authority are satisfied with their proposals.

Brent Recycling and Waste
Concerns raised with regard the quantum of waste storage facilities proposed, however Recycling and Waste have confirmed they agree with the proposals for Phase 1, and require a condition attached to any consent to ensure later phases comply with Brent Waste Policy.

Brent Sustainability
The Energy Statement (section 5.9) states that in order to minimise ventilation losses and uncontrolled ventilation all dwellings would require to be air tested upon completion. Section 5.12 of the Energy Statement comments on thermal bridging and that thermal bridging would be reduced by at least 60%. This should require that thermal bridging calculations are provided before starting on site. The BREEAM assessment states that a thermographic survey would be completed. With recognition that timing is critical for thermographic surveys, a requirement to provide the thermographic survey report within 9 months of completion.

The Energy Strategy and Sustainability Strategy are generally reasonable.

There are renewables that they don't use with CHP (solar thermal for one), but in some of the lower rise blocks consideration could be made of utilising photovoltaics connected directly to the dwelling, particularly for any social housing.Further comments were received on 25th April 2018, which recommended a number of conditions.

The applicant's consultant has calculated the emissions per year from all residential units on the development to be 1,591 tonnes CO2 per annum. This would equate to a total carbon offset fund contribution of £2,863,800 (based on the current contribution of £60 per tonne over 30 years). The Carbon Offset Fund would be payable based on as-built calculations on completion of each phase.

London Borough of Ealing
No response was received.

London Fire Brigade
At time of writing, no response has been received.

NHS (Brent Clinical Commissioning Group)
A healthcare facility is needed on the site. Relevant provision should be made available, and secured under a legal agreement.

Community Involvement
A Statement of Community Involvement (SCI) provides detail of the community engagement undertaken by the applicant since they acquired the site in April 2017 to inform the application proposals.

In accordance with the NPPF and Brent SCI, the approach to engagement has been tailored to the nature of the development proposed. This has exceeded the minimum recommendations of the Brent SCI, and full details are provided within the submitted SCI and the Planning Supporting Statement.

The consultation with the local community included sending letters to over 8,800 households, businesses, local councillors, MPs, community groups and GLA members. Four update newsletters were subsequently issued in May, July, September and December 2017 and a consultation website, phone number and email address provided. The community information centre on the site has also provided a point of access to information, as well as hosting events and 24 open days between August and November where the applicant's representatives were available to answer questions from the community.

A Community Liaison Group (CLG) was also established. The CLG is formed of residents, local stakeholder groups and community representatives and met regularly through the process of preparing the application.

With regard to events, the engagement included over 25 separate public events and more than 20 one-to-one meetings with groups and individuals. The events included:

- Pop up street interviews with 125 people.
- Walk and talks around the site and local area with 19 participants.
- 17 meetings with local groups, 5 meetings with local councillors, 6 CLG meetings and a CLG visit to the applicant's Beaufort Park development.
- A series of design workshops attended by 34 people which considered improvements to the route to Stonebridge Park Station; types of uses and activities for the community centre; types of uses and activities for the public open spaces; and the design of the new community centre.
- Three public exhibitions:
    - Three days in May 2017, attended by 72 people,
    - Three days in July 2017, attended by 122 people, and
    - Three days in September, 2017 attended by 38 people.

The applicant additionally organised activities including the Alperton Summer Festival, a photography workshop and competition and youth engagement workshops.

Through the different events, over 200 people were engaged in the project, and over 500 people attended the Alperton Summer Festival.

As well as community engagement, the applicant held formal pre application consultation with Brent Council officers and the GLA, and has engaged widely with other stakeholders. The

proposals have also been informed by Design Reviews by the Centre for Architecture and the Built Environment (CABE); an independent and impartial process for evaluating the quality of significant developments to ensure the highest quality of development.

POLICY CONSIDERATIONS

National

National Planning Policy Framework (NPPF) 2012
Draft National Planning Policy Framework 2018
Technical Guidance to the National Planning Policy Framework
Planning Practice Guidance (PPG)
Technical Housing Standards

Regional

The London Plan (consolidated with alterations since 2011) 2016
The London Plan Draft for Public Consultation (December 2017)
London Plan policies regarding housing supply, housing mix, affordable housing, density, children and young person's play, industrial land, urban design, access, sustainable energy and transport are applicable.

Mix of uses	London Plan
Housing	London Plan; Housing SPG; Housing Strategy; Affordable Housing and Viability SPG; Mayor of London Housing Zones
Industrial land	London Plan; Land for Industry and Transport SPG
Neighbourhoods:	London Plan; Play and Informal Recreation SPG
Shaping Neighbourhoods:	Character and Context SPG
Affordable housing	London Plan; Housing SPG; Housing Strategy; Affordable Housing and Viability SPG
Retail/town centre uses	London Plan; Town Centres SPG
Density	London Plan; Housing SPG
Employment	London Plan;
Urban design	London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG
Tall buildings/views	London Plan
Access	London Plan; Accessible London: achieving an inclusive environment SPG;
Sustainable development	London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy
Air quality	London Plan; the Mayor's Air Quality Strategy;
Transport	London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG
Parking	London Plan; the Mayor's Transport Strategy

Local

Brent Local Development Framework Core Strategy 2010
CP1 Spatial Development Strategy
CP2 Population and Housing Growth
CP3 Commercial Regeneration
CP5 Placemaking
CP6 Design & Density in Place Shaping
CP8 Alperton Growth Area
CP14 Public Transport Improvements
CP15 Infrastructure to Support Development

CP16 Town Centres and the Sequential Approach to Development
CP17 Protecting and Enhancing the Suburban Character in Brent
CP18 Protection and Enhancement of Open Space, Sports and Biodiversity
CP19 Brent Strategic Climate Mitigation and Adaptation Measures
CP20 Strategic Industrial Locations and Locally Significant Industrial Sites
CP21 A Balanced Housing Stock
CP23 Protection of existing and provision of new Community and Cultural Facilities

Brent Development Management Policies Development Plan Document 2016
DMP1 Development Management General Policy
DMP2 Supporting Strong Centres
DMP3 Non-Retail Uses
DMP4A Shop Front Design and Forecourt Trading
DMP7 Brent's Heritage Assets
DMP9 Waterside Development
DMP9A Managing Flood Risk
DMP9B Off Site Water Management and Surface Water Attenuation
DMP11 Forming an Access onto a Road
DMP12 Parking
DMP13 Movement of Goods and Materials
DMP14 Employment Sites
DMP15 Affordable Housing
DMP18 Dwelling Size and Residential Outbuildings
DMP19 Amenity Space

Brent Council Supplementary Planning Guidance and Documents
Draft SPD1 Brent Design Guide (2017)
SPG3 Making an Access to a Road (2004)
SPG13 Layout standards for access roads (2004)
SPG17 Design Guide for New Development (2001)
Alperton Masterplan (2011)

DETAILED CONSIDERATIONS

Introduction and Structure of this Report

1. The majority of the redevelopment of the site is applied for in outline with all matters reserved. The outline development is set out within the submitted Parameter Plans, Development Specification document and Framework Design Code which establish the controls that would apply to the development. However, the application for Phase 1 of the development at the north-west part of the site is in full detail and is supported by full drawings and details.

2. Both elements of the scheme (those in outline and full) are accompanied by a suite of supporting reports, including an Environmental Statement; Design and Access Statement; Planning Supporting Statement; Transport Assessment and Travel Plans; Affordable Housing Statement; Financial Viability Assessment; Town Centre Uses Statement; Energy Statement; Sustainability Statement; Dynamic Overheating Assessment; Internal Daylight and Overshadowing Report; Statement of Community Involvement; Utilities Strategy Report; Demolition Method Statement; Framework Construction Method Statement and Logistics Plan; Operational Waste and Recycling Management Strategy; Ecological Baseline Reports; Tree Survey and Arboricultural Impact Assessment; Flood Risk Assessment; Drainage Strategy Report; Employment Strategy; and Fire Strategy.

3. The submitted drawings and reports have been considered and the views of officers and comments received in relation to this application have been summarised in this report.

4. The principal material considerations relevant to this application are as follows:
   - Environmental Statement
   - Principle of land uses; including the impact of the creation of residential accommodation on strategic industrial land
   - Density
   - Design and Heritage
   - Landscaping, Open Space, Play Space & Trees
   - Transportation & Highways
   - Housing considerations (Affordable Housing & Financial Viability, dwelling mix and quality of accommodation)
   - Neighbouring amenity
   - Energy and sustainability
   - Accessibility
   - Representations received
   - Planning Obligations and Community Infrastructure Levy (CIL)

Land Use Principles

5. The application site is located within the Alperton Housing Zone and the north-west part of the site is within the Alperton Growth Area. The majority of the site (with the exception of a small area at the north-west) is part of the Park Royal Strategic Industrial Location (SIL) (8.32 Ha). The north-west part of the site that is not SIL land is a Local Employment Site (0.84 Ha).

Employment (Use Classes B1a, B1c and B8) Taking all the following into account, the provision of 17,581sqm GIA employment floorspace overall delivered in line with the submitted employment strategy, is supported.

6. Development Management Policy (DMP) 14 provides the policy framework under which the release of SIL and Local Employment Sites are considered. This policy sets out that SIL should only be released in certain circumstances, including where it is low quality employment space suitable for release, and where the scheme has significant regeneration benefits to the wider area.

7. It is accepted that the 7.26ha of SIL to the north of the River Brent is a "low quality employment site". The Council's Employment Land Demand Study (2015) identified this part of the site as suitable for release to alternative uses, due to the site having "bad neighbourhood impacts" on the surrounding residential areas including HGV traffic, noise and congestion. The Study did however also identify that 20% of this part of the site should be retained for employment uses. This was a critical part in why DMP 14 requires any release of employment land to incorporate employment uses providing an efficient use of land on approximately 20% of the site area. It should be noted that the Employment Land Demand Study included a plan which showed the area that was identified as being of low quality and this area corresponds to the area that is proposed for mixed use, residential led development within this application. However, the Employment Land Demand Study incorrectly specified that the size of this area is 5.81 Hectares. Measurements of this area taken by officers confirm that the size of the area that was identified as being of low quality is actually 7.26 Hectares.

8. There is approximately 15,621 sqm (GIA) of existing employment floorspace within the red line boundary of the application site that is proposed to be demolished. The applicant is proposing the provision of the following employment floorspace within the new development:

Phase 1: 850sqm GIA B1a space
Building L (Phase 6): 4,708sqm GIA B1c space
Building N (The Generator, Phase 3): 12,023sqm GIA B1c/B8.
TOTAL: 17,581sqm GIA

9. 5,558sqm of employment space is proposed on the 7.26ha (72,600sqm) part of the site that is

identified as suitable for release from SIL to alternative uses. 20% of the site area is 1.42 ha. At a typical plot ratio of 0.45 for an operationally efficient industrial / storage use (as identified on page 72 of the Employment Land Study), this would equate to 6,534sqm of floorspace.The provision of 5,558sqm on land area of 72,600sqm would equate to 17% of site area which is 85% of the requirement and so does not comply with DMP 14. However, when assessing this provision against the existing 15,621sqm employment floorspace on site, what is proposed equates to approximately 36% re-provision of employment floorspace of a much higher quality that will better meet business needs. In addition, the policy justification does also indicate that flexibility will be shown with regards to the 20% employment requirement where viability is impacted. This is particularly so when balanced up against affordable housing provision, which is prioritised over employment, subject to recognising that successful places usually comprise a mix of uses rather than being wholly residential.

10. The provision of 12,023sqm new B1c/B8 industrial space - referred to as The Generator - on the SIL site to the south of the River Brent is both a qualitative improvement and an intensification of existing industrial provision on the site. The Generator is proposed to provide circa 10,000sqm of light industrial accommodation to attract a range of operators from start-ups to established businesses. It will offer flexible workspaces, and would include communal facilities such as a café and shared meeting rooms. Investment in this scale and type of industrial space is only resulting as a consequence of seeking to be as policy compliant as possible in relation to employment provision on the wider Northfields application and would otherwise not be pursued as a standalone development. This investment is welcomed, and is considered to be a good, modern facility which will enhance employment opportunities in this part of the Borough to an extent that otherwise would be unlikely to occur.

11. DMP 14 states that new developments on Local Employment Sites should provide the maximum amount of existing floorspace type or Managed Affordable Workspace possible. The applicant is proposing 325sqm GIA of affordable workspace prior to occupation of the first 600 residential units. Whilst technically not being re-provided on the land allocated as a Local Employment Site, when reviewed alongside the provision of 17,581sqm employment floorspace across the site and given scheme viability, this proposal is considered acceptable and in line with policy.

12. The provision of affordable workspace will ensure there are a range of spaces on site to accommodate businesses throughout different stages of their growth cycle. Affordable workspace is secured for the lifetime of the development, and is to be leased at no more than 50% of the market rate to an Affordable Workspace Provider approved by the Council. The Council would require the Affordable Workspace Provider to submit an Affordable Workspace Plan, which should include details as to how the space will be managed, the proposed rent to be charged to the end tenant, the terms of the leases or licences with the end tenants. An annual report including details of who the tenants of the space are, the rents they are paying and reasons why any businesses have moved on should be submitted to the Council by the Affordable Workspace Provider. This would be secured under the legal agreement.

13. The applicant is also proposing a minimum 1,394sqm temporary workspace known as the Creative Quarter, in Phase 1, which is welcomed. Their Employment Strategy states that the businesses in the Creative Quarter will have the opportunity to migrate into the permanent workspaces. To ensure this is possible, the Generator should be delivered and ready for occupation prior to the commencement of Phase 4 to allow businesses within the Creative Quarter the opportunity to move across with no interim loss of space. The Council would want to ensure the temporary structure of the Creative Quarter is moved to another location prior to commencement of Phase 4 to allow for continued provision of employment space for businesses that are not yet ready to move onto permanent space and to maximise employment floorspace provision on the site until all permanent employment floorspace has been delivered. This would also be secured under the legal agreement.

14. The mix of affordable workspace, light industrial units proposed in Block L and more traditional,

heavier industrial space proposed in the Generator is welcomed and ensures there is a range of spaces on site to suit businesses at different stages of their growth cycle.

15. The applicant's Employment Strategy does not provide details on how these spaces will be managed once delivered. As such, a condition is recommended in order to ensure the proposed 'Generator' is laid out in a way which would facilitate the aims of the Employment Strategy, with a maximum cap on unit sizes in order to ensure that the building is not occupied by a single operator.

Meanwhile Uses

16. The application includes provision of temporary meanwhile uses while construction is ongoing. These are intended to make efficient use of the site while it is being developed, and would help mitigate the impacts related to the time period between the loss of the existing employment floorspace on the site, and the provision of new, permanent employment generating floorspace. .

17. The applicant has indicated their aspiration to create a temporary 'Creative Quarter' that would provide small, flexible workspaces offering seed bed units or incubator space for start-up businesses and entrepreneurs. The potential to set up a training facility for construction that would be co-located with the site welfare and canteen facilities to create a hub, is also being investigated. Relevant conditions and/or clauses within the legal agreement would be added to ensure full details of the meanwhile use(s) are secured, and where relevant would be supported by the proposed s106 agreement.

18. Draft London Plan policies H4 and HC5 support opportunities for the provision of meanwhile uses on sites in order to make efficient use of land and to stimulate vibrancy, vitality and diversity with a particular focus on cultural and creative activities. The inclusion of meanwhile uses is supported by the OPDC. The provision would help to provide employment opportunities and activity within the site from an early stage, and would support local businesses, including start-up businesses and entrepreneurs, until more permanent space is delivered on the site.

19. Given the phased nature of the development and anticipated timescales (with an indicative construction duration of 19 years and the delivery of much of the employment floorspace later in the development), the proposed meanwhile uses would activate what would otherwise be empty parts of the site, reprovide employment generating floorspace and support the regeneration of the site and Alperton area. Their inclusion as part of the strategy for the site would therefore make a positive contribution, and is supported in accordance with policy. Officers want to see the meanwhile space delivered within 6 months of the commencement of superstructure development works and have requested details of provision for affordable space and management arrangements. This is reflected in the Heads of Terms for the proposed s106 agreement.

Residential Accommodation (Use Class C3)

20. The majority of the floorspace proposed (up to 283,000sqm) is residential accommodation and housing would be provided as part of all building plots on the site with the exception of Building Plot N to the south of the River Brent. The development would deliver up to 2,900 homes, with 400 homes delivered in Phase 1 at the north-west part of the site.

21. The London Plan identifies a minimum target for Brent to provide 15,253 new homes between 2015 and 2025; an annual requirement of 1,525 homes. However, the draft London Plan looks to significantly increase housing delivery across London and identifies an increased target for Brent to deliver 29,150 new homes between 2019 and 2029, an annual requirement for 2,915 homes.

22. The application site is in the Alperton Housing Zone, an area prioritised for accelerated housing delivery and where at least 3,213 new homes were envisaged when the area was designated. Core Strategy Policy CP1 also focuses housing development in five growth areas, including the Alperton Growth Area.

23. The proposal for 2,900 homes on the site would be equivalent to approximately 10% of the minimum housing target for Brent required to 2029 as set out in the draft London Plan. The proposal would make an important contribution to meeting the identified need and relevant targets for housing in Brent. The development would further support the regeneration of both this previously developed site, and the wider Alperton area by delivering enhancements that would encourage further investment in the local area.

24. As such, the delivery of the proposed homes as part of the residential led, mixed use development of the site is considered to be a significant benefit and is in accordance with Brent and London Plan policy and the national emphasis on delivering a wide choice of housing to respond to housing need as highlighted within the NPPF and draft NPPF.

Community and Leisure (Use Classes D1 and D2)

25. 1,900 - 2,900sqm of community floorspace (D1 non-residential institutions and D2 assembly and leisure is proposed. This would be flexible space, and the range proposed allows for space to come forward in response to future needs and demands. 1,610sqm of community and leisure uses would be delivered as part of Phase 1 within the ground floor level of Buildings C and D. Building C is expected to accommodate a nursery (230sqm) and a community centre (490sqm), with the remaining floorspace to be provided within Building D.

26. The proposed community-centre has been designed with input from the local community. Located at the north-west part of the site, this location is considered appropriate to maximise the potential for integration with the existing community.

27. The delivery of the community centre in Phase 1 would be a benefit, and would ensure that supporting uses are available early in the life of the development, while there would be further capacity to accommodate additional community space as part of the outline development as this comes forward on the site in future.

28. Core Strategy Policy CP5 requires consideration for a mix of uses to meet the needs of the community as part of new development. The flexible community and leisure would accommodate a range of local needs and would support both the existing community and proposed development. The location and nature of the uses would support placemaking and the creation of a sustainable community. The space would help to secure the regeneration of the site and Alperton, and is supported in accordance with Brent and Mayoral policy.

Healthcare

29. Officers have been in consultation with the Brent Clinical Commissioning Group (CCG) through the pre-app and application process. The CCG have confirmed that based on their modelling, the impact of the proposed development and the associated population increase would result in a new health care facility being required in order to meet patient demand in the area.

30. The CCG require a healthcare facility of circa 800 sqm, fitted out and to be delivered prior to first occupation of the first 600 units across the development. As such, an obligation within the proposed Section 106 agreement would secure the delivery of up to 800 sqm of floorspace prior to first occupation of the first 600 residential units, with the final quantum of floorspace, specifications of the fit out and commercial terms to be agreed with the CCG, unless otherwise agreed by the LPA. This would allow for detailed plans and commercial terms to be agreed post-decision.

31. On this basis, it is considered that the proposed development would deliver an adequate healthcare facility in order for an existing surgery to relocate to the Northfields site, and expand to accommodate the additional patients the proposed development would create.

Town Centre Uses

32. The proposals include a maximum of 2,300sqm commercial floorspace (excluding 'employment' generating florrspace [B1a/b/c, B2, B8]) across the site. This space would be flexible and would provide accommodation suitable for a range of occupiers and uses including Use Classes A1 (shops), A2 (financial and professional services), A3 (restaurants and cafes), A4 (drinking establishments) and A5 (hot food takeaways). 1,290sqm of this space would be provided as part of Phase 1, located within the ground floor level of Building D.

33. The location of the proposed commercial units is to create a focus around one of the accessible and attractive parts of the site. The aim is to create a busy piazza, with an active ground floor frontage, and provide opportunities to enjoy the public realm and Canal Frontage. Located opposite the junction of Highcroft Avenue with Beresford Avenue, it is hoped to draw in the wider community to use the space and shops/cafes.

34. The delivery of the commercial uses within Phase 1 will ensure supporting services are available to the existing and new community from the beginning of the development. There would be further capacity to accommodate additional commercial space as part of the outline development as this comes forward on the site in future, complementing early stage provision.

35. The site is not within a town centre where commercial and retail uses should generally be focussed. However, the scale and nature of the uses are appropriate to support the development and it is considered that there would be a need for these facilities as a result of the development as demonstrated by the Town Centre Uses Statement. This analysis also shows that there would be no adverse impact on other nearby centres or on investment in the area through the inclusion of the commercial floorspace. Given the need for these uses to support the wider development on the site, there would be no sequentially preferable locations to accommodate the proposed commercial floorspace, and the sequential test required in accordance with the NPPF would be satisfied.

36. The proposed commercial space is therefore considered to be appropriate to the scale and nature of the proposed development. It would support the existing and new community by providing services that would meet day-to-day needs, without impacting detrimentally on other local centres. As such, it would reduce the need for the community to travel to access services, and would support the creation of a sustainable community and place. The inclusion of commercial space within the development is therefore supported in accordance with national and local policy.

Residential Accommodation, Affordability and Viability, Size and Mix

Affordable Housing

37. London Plan Policies 3.11 and 3.12 seek to maximise the delivery of affordable housing and set a strategic target of 50% provision. Boroughs are required to maximise affordable housing on private and mixed use developments, having regard to a number of factors, including development viability. The draft London Plan establishes a threshold approach to affordable housing, and identifies a minimum threshold of 35% (by habitable room), with a threshold of 50% for SIL sites deemed appropriate for release.

38. Core Strategy Policy CP2 and Development Management Policy DMP15 indicate a strategic target for 50% of new homes in the borough to be delivered as affordable. DMP14 further states that development on designated employment sites, such as this, should deliver at least 50% affordable housing. Where a reduction to provision is sought on economic grounds a development appraisal should demonstrate that schemes are maximising affordable housing

output. Policy DMP15 also sets a tenure split target for 70% to be social/affordable rented and 30% intermediate.

39. Across the development, this scheme proposes 35% of the housing to be Affordable, at a 70/30 split. The development would be tenure blind. The application was accompanied by a Financial Viability Appraisal (FVA) which demonstrates that 35% is the maximum reasonable proportion of affordable housing that can be achieved on site

40. Within Phase 1 of the development, 91 affordable rented homes and 36 shared ownership homes would be delivered, equating to 31% in Phase 1 (by habitable room).

41. Further, of the affordable homes, 70% would be for affordable rent and 30% intermediate on a habitable room basis, with affordability levels reflecting local needs. The tenure split accords with the target at Policy DMP15 and draft London Plan policy H7 and is therefore fully supported.

42. In summary, the development would deliver a significant level of affordable housing in the local area as part of the wider benefits of the scheme and would provide a range of products resulting in choice and a balanced community, which is supported by Brent and Mayoral policy.

Appraisal of Financial Viability Assessment

43. The proposal includes 1,014 affordable homes across the entire scheme, representing 35% affordable housing on a policy compliant tenure split of 70:30 affordable rent to shared ownership. The local plan policy requirement, however, is for 50% on a SIL site.

44. The applicant submitted a detailed Financial Viability Appraisal (FVA) and supporting evidence in February 2018 to demonstrate their contention that the proposed 35% affordable housing puts the scheme into a financial deficit, represents more than the maximum reasonable and viable amount of affordable housing the scheme can deliver, and is therefore in line with national planning policy.

45. The applicant's appraisal was undertaken on a current day cost and current day value basis, and assumed a Benchmark Land Value (BLV) of £51.5m (representing a site value of £41.2m plus a 25% premium). The appraisal achieves an Internal Rate of Return (IRR) profit of 4.79%, which is below the applicant target IRR of 15-17%, representing a nominal profit deficit of -£99.2m. The FVA concludes that as the achieved IRR is significantly below the target IRR, the proposed 35% affordable housing is above what is financially viable.

46. Following a mini tender, officers appointed GL Hearn to carry out an independent assessment of the FVA. GL Hearn's initial report disagreed with multiple assumptions used within the FVA, with major points of differences as follows:-

47. Benchmark Land Value (BLV): GL Hearn considered it inappropriate to apply a 25% premium to the £41.2m site value, as that value was based on alternative industrial redevelopment of the site rather than existing use.

- Build costs: GL Hearn's quantity surveyor Johnson Associates considered St George's base build cost estimate to be too high, and reduced it by £51.2m, from £888.9m to £837.7m.
- Residential values: St George's FVA assumed 'place-making' improvements from the regeneration would increase residential sales values across the development by 6.85%, but GL Hearn initially proposed a higher increase of 20% in residential sales values.
- GL Hearn's own appraisals concluded that with 35% affordable housing the proposed scheme could generate an IRR of 10.11%. GL Hearn considered an IRR profit at the lower end of the proposed target IRR of 15-17% to be reasonable for the scheme, and therefore that the scheme was in clear deficit on a current day cost and value basis. Given the context of a

scheme proposed on protected Strategic Industrial Location (SIL), where London Plan and Local Plan Policy requires release of SIL sites deliver significant regeneration benefits, including 50% affordable housing, together with the high degree of uncertainty attached to any FVA for a large scale multi-phased regeneration spanning a 15-20 year period, GL Hearn however advised that appropriate post-implementation review mechanisms should be secured in the s106 agreement to test actual rather than estimated costs and values as the scheme is delivered.

48. St George Development's response to GL Hearn's initial report opposed all points of difference put forward by GL Hearn and disagreed with the principle of a review mechanism:

"Considering the significant site investment St George are making, the risk on inflation St George are taking to bring the site forward in the current turbulent market and the 35% Affordable Housing at the quantity, tenure mix, product type and values we are offering, we do not agree that an advanced stage review mechanism is appropriate."

49. Discussions took place between the relevant parties. As a consequence, some adjustments to assumptions were made.

50. GLA Stage 1 viability comments released on 22nd and 31st May 2018 noted the following points:-
51. Appraisals be tested on the basis of reasonable growth in both residential sales values and build costs, to demonstrate how viability would be expected to improve over the lifetime of such a long-term regeneration.

- GLA agreed with St George's assumption of 6.8% place-making uplift in residential values.
- GLA noted base build costs assumed by St George are too high, but that Johnson Associates reduced 3% contingency sum was not reasonable, and that a 5% contingency is typical given the high level of scheme information available at planning stage.
- Short-term income from leasing undeveloped parts of the site for open storage prior to and during development could reasonably be achieved and should be factored into the appraisals.
- A target IRR of 15-17% is only reasonable when factoring growth in residential values and build costs within the appraisal. A lower target IRR of 12-15% should be assumed when appraising on a current day cost and value basis.
- Development should be re-appraised assuming 50% pre-sales rates for residential units
- GLA opinion was that St George and GL Hearn methods of calculating the BLV was incorrect for planning purposes, but that GL Hearn's base value of a BLV £41m is probably about right.

- GL Hearn updated their report to address both St George's response and GLA comments June 2018. Major changes to GL Hearn's appraisals included:-

52. Reducing the assumed uplift of residential sales values from place-making to 6.8% in line with St George's original assumption.

- Adopting Johnson Associates' revised building cost estimate and £36.6m savings.
- Factoring in short term income from vacant land in line with GLA assumptions.
- 35% pre-sale rates for residential units

- A revised appraisal accounting for these adjustments on current day costs and values generates an IRR of 11.45%, slightly below the lower end of the 12-15% range that the GLA considers reasonable when appraising on a current day cost and value basis.

53. GL Hearn advised that there is a significant uncertainty when applying short term growth forecasts for costs and values to a long term scheme, however carried out an appraisal factoring estimates on reasonable growth in residential sales values and build costs over the lifetime of the regeneration. This growth appraisal with 35% affordable housing results in an

IRR of 14.5%, slightly below the lower end of the target IRR of 15-17% set by St George and considered reasonable by GL Hearn and the GLA when appraising on a growth basis. The increase in IRR when factoring growth demonstrates how sensitive FVAs are to changes in underpinning variables.

54. In summary, these further GL Hearn current day cost and value and growth appraisals indicate that whilst the scheme delivering 35% affordable housing on a policy compliant tenure split is broadly viable on GL Hearn assumptions, the scheme is in marginal deficit against a £41.2 BLV and the lower end of accepted reasonable IRR profit ranges. St George own appraisals indicate the scheme delivering 35% affordable housing has a larger deficit, as their assumptions allow for a higher BLV, higher build costs, and other more pessimistic assumptions.

55. GL Hearn have also undertaken sensitivity testing and advised the Council that on a current day cost and value basis, their view is that the maximum reasonable and viable amount of affordable housing the scheme can deliver on a policy compliant basis is 11% affordable housing, which is noted to be considerably below the 35% level proposed.

56. Officers objected to the initial delivery profile, which saw affordable housing back-loaded into later phases of the scheme. Originally, only 10% affordable housing was included in Phase 1, (38 shared ownership units). In response to officer concerns that very little affordable housing and no affordable rented housing was proposed in Phase 1, an amended delivery profile has been agreed, with 91 affordable rented and 36 shared ownership units, representing 31% affordable housing provision by unit on a policy compliant tenure split. This improved delivery profile is subject to the condition that there is no post-implementation review mechanism in the s106 agreement.

57. Originally Submitted Affordable Housing delivery profile:-

	Private	Shared Ownership	Affordable Rent	Total Affordable	Affordable %	TOTAL	Delivery
Phase 1	364	38	0	38	9.5%	402	Mar-23
Phase 2	374	80	163	243	39.4%	617	Sep-26
Phase 3	258	56	112	168	39.4%	426	May-29
Phase 4	361	75	153	228	38.7%	589	Feb-33
Phase 5	221	46	92	138	38.4%	359	May-35
Phase 6	307	67	133	200	39.4%	507	Jul-38
TOTAL	1885	362	653	1015	35%	2900	

58. Revised Affordable Housing delivery profile (Phases 2-6 Affordable pro rata'd down, exact figures to be agreed):-

	Private	Shared Ownership	Affordable Rent	Total Affordable	Affordable %	TOTAL	Delivery
Phase 1	272	36	91	127	31.83%	399	Mar-23
Phase 2	396	80	141	221	35.82%	617	Sep-26
Phase 3	273	56	97	153	35.92%	426	May-29
Phase 4	382	75	132	207	35.14%	589	Feb-33
Phase 5	234	46	79	125	34.82%	359	May-35
Phase 6	326	67	114	181	35.70%	507	Jul-38
TOTAL	1883	360	654	1014	35.00%	2897	

59. The revised 35% affordable housing offer on a policy compliant tenure split is below the 50% affordable housing target set in policy for SIL sites. Given the viability evidence however, officers view the offer to be a reasonable one. The 35% level proposed is a meaningful betterment over the 11% level that GL Hearn consider to be the maximum provision the scheme can reasonably and viably deliver on a current day cost and value basis. GL Hearn growth testing also indicates that 35% affordable housing on reasonable growth assumptions generates an IRR profit below the lower end of the range agreed by both GL Hearn and the GLA to be reasonable.

60. Officers therefore recommend that the 35% affordable housing offer represents the maximum reasonable amount of affordable housing that the scheme can deliver in this case, as demonstrated through the viability testing. The GLA have supported this approach, including the absence of a post-implementation review mechanisms, which would normally be required on a less than policy compliant, multi-phased, scheme.

Unit Mix

61. Policy CP21 of the Brent Core Strategy seeks to maintain and provide for developments to provide a balanced housing stock by ensuring that new housing appropriately contributes an appropriate range and mix of self-contained accommodation types and sizes, including family sized accommodation on suitable sites providing 10 or more homes. Policy CP2 states that at least 25% of new homes across the borough should be family sized (3 or more bedrooms). London Plan Policy 3.8 requires different sizes and types of dwellings to meet different needs and Policy 3.11 states that within affordable housing provision, priority should be accorded to family housing.

62. Across the whole scheme, the development would provide the following unit mix:

	Market		**Intermediate**		**Rented**		**Total**	
	Number	**Hab Rooms**	**Number**	**Hab Rooms**	**Number**	**Hab Rooms**	**Number**	**Hab Rooms**
Studio	189 (10%)	189 (4%)	46 (13%)	46 (6%)	0 (0%)	0 (0%)	235 (8%)	235 (3%)
1 Bed	564 (30%)	1,128 (22%)	163 (45%)	326 (39%)	164 (25%)	328 (17%)	891 (31%)	1,782 (22%)
2 Bed	661 (35%)	1,983 (38%)	143 (40%)	429 (51%)	326 (50%)	978 (50%)	1,130 (39%)	3,390 (43%)
3 Bed (+)	471 (25%)	1,884 (36%)	10 (3%)	40 (5%)	163 (25%)	652 (33%)	644 (22%)	2,576 (32%)
Total	1,885	5,184	362	841	653	1,958	2,900	7,983

63. A proportion of larger family sized affordable housing of 4 bedrooms or more is expected in later phases (Phase 2 - 6).

Within Phase 1, the housing mix proposed is:

	Market		**Intermediate**		**Rented**		**Total**	
	Number	**Hab Rooms**	**Number**	**Hab Rooms**	**Number**	**Hab Rooms**	**Number**	**Hab Rooms**
Studio	49 (17%)	49 (6%)	6 (27%)	6 (10%)	0 (0%)	0 (0%)	55 (14%)	55 (5%)
1 Bed	59 (21%)	118 (16%)	4 (18%)	8 (13%)	31 (34%)	62 (25%)	94 (24%)	188 (18%)
2 Bed	121 (42%)	363 (48%)	2 (9%)	6 (10%)	58 (63%)	174 (70%)	181 (45%)	543 (51%)
3 Bed	57 (20%)	228 (30%)	10 (45%)	40 (67%)	3 (3%)	12 (5%)	70 (18%)	280 (27%)
Total	286	758	22	60	92	248	400	1,066

64. The development would provide for a varied range of unit sizes, including a significant proportion of family sized (three bedroom) homes (25% of affordable rented homes and 22% across all tenures). The proportion of affordable family-sized homes, and the indicative mix delivering a wide range of housing choice is welcomed. The provision of 3 bedroom intermediate homes by number is below the minimum 25% required by Policy CP 2. However,

the proportion of private and affordable rented 3-bedroom homes is compliant. This results in a reduction in the overall proportion to 22 %. However, there are known affordability issues with 3-bedroom intermediate homes whereby those homes are often not affordable for shared ownership purchasers. Because of this, the lower proportion of three bedroom intermediate homes is considered to be acceptable. Overall, it is considered that the development achieves the maximum that can realistically be attained in the market without fundamentally undermining other local plan policy outcomes and objectives referred to in this report and would be in accordance with Mayoral policy. As such it is considered an acceptable mix of dwelling sizes is proposed.

Jobs

65. The Core Strategy recognises that mixed use redevelopment, including within growth areas, can help to deliver jobs for local people and that job opportunities should be supported alongside population growth.

66. The majority of the application site has been cleared, and given the nature of the previous low intensity and poor quality industrial uses on the site these supported a relatively small number of jobs. The remaining units currently on the site are estimated to provide for approximately 47 jobs.

67. Employment opportunities linked to construction works would be temporary, however the development is anticipated to have a construction period of 19 years and they would not therefore be transient opportunities. While construction employment levels would fluctuate, the applicant anticipates that the construction phase of the development would support up to 500 jobs per year.

68. The meanwhile 'Creative Quarter' will provide further job opportunities and support for local businesses as discussed above.

69. On completion, the proposed employment and commercial uses would intensify employment opportunities on the site in comparison to the existing low density provision. Employment opportunities would be supported by the proposed floorspace of up to 19,000sqm B1c and B8 uses to be delivered within the Generator, Building Plot L and the Phase 1 development. Additional employment opportunities would be provided by the commercial and community uses.

70. Given the outline nature of the majority of the development proposed, the Environmental Statement estimates that under a 'worst-case' scenario, 423 jobs would be provided on the site, although the development is expected to support closer to approximately 650 jobs on completion. The accommodation that is proposed would provide a range of modern, flexible workspace and therefore would support the viability and growth of local businesses, and as a result encourage the retention of SIL land to the south of the site and the local economy, and there would be further positive indirect and multiplier effects within the local economy.

71. The proposal has the potential to deliver a significant number of new jobs which is welcomed and is considered to accord with Brent and Mayoral policy.

Scale and Design

72. The application proposes redevelopment of the previously developed, and more recently under-developed site. In comparison to the existing largely vacant and inefficient, low density industrial location, the proposal would result in a complete change to the character and appearance of the site, and the wider area. However, as noted above the site is at the gateway to the Alperton Growth Area and is within the Alperton Housing Zone. Redevelopment of this site is considered to be key to the transformation of the site and driving the regeneration sought for the area.

73. The site is currently a large, mostly inaccessible piece of land (for the public) and has historically acted as a barrier to permeability and prevented access to the canal and River Brent. The proposed redevelopment offers opportunities for significant improvements to both the site and wider area and is considered that the proposed development would support the continued regeneration of this part of the borough.

74. As most of the application is in outline, indicative information has been provided regarding the design and appearance of the buildings. A Framework Design Code provides details of the principles that would guide development of the outline application area, and further information on the design approach and the evolution of the proposals in response to relevant considerations and pre application engagement is set out within the Design and Access Statement.

75. The development has been informed by Design Reviews with the Design Council CABE, and highlights that the proposals are underpinned by masterplan principles which were informed by contextual and environmental analysis as well as relevant policy and design guidance. These key principles are stated by the applicants to be:

76. Improving connections
    - High quality environment
    - A new destination
    - Accessible spaces open to all
    - Opening up the watercourses with public access and bridges and providing new access to the Grand Union Canal.
    - A range of green spaces

- The application of these principles is considered to result in the transformation of the site to form a new neighbourhood. It would deliver a mixed use development that makes effective use of the site to deliver growth and a range of benefits to the local area as considered further below.

<u>Pedestrian Movement, Landscaping and Public Open Space</u>

77. The scheme will enable permeability and public access through the site, connecting existing residential areas to the north and west of the site to the canal and river, and creating improved links to public transport nodes. Six new vehicular and/or pedestrian and cyclist accesses would be created in the northern boundary of the site with an additional service-only access for the industrial space at Block L. Two further accesses would be provided from the Old North Circular, and provision is made for a bridge across the River Brent to connect the two parts of the site.

78. The main pedestrian access at the west part of the site connects to the existing north-south street pattern to the north side of Beresford Avenue, while another pedestrian and cyclist access point at the east side would connect with Heather Park Drive and the route to Stonebridge Park station.

79. The new pedestrian connections from the north of the site would link into the main east-west route through the site. This is to be a broad, landscaped green spine at the centre of the development, open to pedestrians and cyclists but not motorised vehicular traffic. The 'Central Gardens' area would provide direct visual connection with the Grand Union Canal, opening up into a new piece of public realm adjacent to the canal and would be surrounded by a mixture of residential, commercial and community uses, with this layout helping to create a new canalside quarter within the site. It would also provide a direct connection from the canal at the west towards Stonebridge Park.

80. Improvements to the walk/cycle route to and from Stonebridge Park station are also proposed.

Further improvements will be made to Beresford Avenue which will enhance the environment for pedestrians and cyclists and improve traffic flow.

81. The proposal includes a landscaped edge along the River Brent that will provide access to the waterside, and promote walking, cycling and opportunities for biodiversity through restoration of the natural landscape. There would be further improvements to the canal frontage at the south and west of the site, with additional pedestrian links, civic space and canal edge restoration works.

82. Around these areas of public realm, the development proposes a hierarchy of streets forming a network that would improve permeability and provide connections with the existing neighbouring residential communities.

Layout and Building Forms

83. The layout of buildings proposed is logical, and an appropriate response to the surrounding neighbourhood and the uses proposed. Furthermore, the siting and design of the buildings proposed would create strong street frontages to encourage a defined sense of place for the new community, and would relate well to the existing surrounding areas – along with supporting the principles of active frontages and natural surveillance across the site which would help to encourage footfall, activate the public space and make the public routes and spaces that are to be delivered attractive, thereby encouraging their use and helping design out crime.

84. Lower buildings of around 4-5 storeys are proposed on the northern part of the site to relate to existing residential development along Beresford Avenue. Greater height is proposed at 'marker locations' to create focal points and improve legibility. The tallest building is at the 'gateway' to Stonebridge Park, creating a sense of arrival, and with higher development marking key locations, within Phase 1 and the Central Gardens. Whilst the proposed heights across the site are significantly taller than the existing (or former) buildings and the neighbouring residential properties, the distribution of height and scale across the site would respond sensitively to the local area and would not appear excessive or overbearing, while a high quality of architecture would provide for visual interest. Together with the quality of the layout of development, the height and scale of buildings proposed is considered to be broadly acceptable, is supported by the GLA and the Design Council Review Panel, and would optimise housing output and the provision of open space on the site.

85. Set within the proposed public realm and streets, there would be a series of buildings of varying scale and height which are considered to respond well to the overall site layout, and the surrounding area. The indicative details illustrate that the majority of the building plots would be laid out as courtyard blocks with either fully enclosed courtyards or U-shaped blocks around courtyards. Such a layout would allow for good residential quality, while also delivering frontages able to create active streets, and providing a hierarchy of external spaces with clearly defined public and private spaces.

Location of Non-Residential Uses

86. Employment uses would be delivered to the southern part of the site within the Generator. This would be well-located to benefit from road access from the North Circular road and to respond to the adjacent industrial building and uses. Separation from the proposed residential development on the northern part of the site would be provided by the River Brent which would help to reduce potential impacts on future occupiers of the development.

87. Additional light industrial space of (B1c) is proposed at the east part of the application site within the ground floor of Building Plot L (see employment section, above). This floorspace would be co-located with residential above. Such co-location to intensify use of sites is

encouraged by the London Plan, is supported subject to appropriate measures being incorporated within the detailed design of this element as it comes forward to mitigate any potential adverse impacts through noise or disturbance. Conditions are recommended in order to ensure the co-location of residential and industrial uses would not harm one-another, would not prejudice the delivery of either use, and would ensure the amenity of the residential occupiers is protected.

88. Commercial and community uses are focused within the Phase 1 area as discussed below, although provision for additional floorspace within the outline application area is made which would provide for further activity and life to the development to be focussed at ground floor level and along the Beresford Avenue frontage of the site to engage with the existing area.

Design

89. The Framework Design Code establishes a simple façade treatment and limited palette of materials focussed on high quality brick which would reflect the existing character of development in the area and while appearance and landscaping are reserved matters for the outline application, the development is designed according to four character areas (the Central Gardens, the Canalside, the Riverside Meadows and Beresford Avenue). These would share common characteristics to ensure that the development is experienced as a cohesive whole, but would each have a distinct character through variations in the materials, elevational treatment, massing, use and function of the buildings, together with the surrounding landscaping. This variation would help to provide an identity for the development, and create a strong sense of place.

90. The layout, scale and design of the development would make effective use of the site and is regarded as appropriate for this location and context. The proposals would deliver a good quality redevelopment and create a new neighbourhood with a distinctive character and identity. The mix of uses proposed would represent a logical approach to delivering a sustainable community, including in relation to the surrounding existing development, and the uses would be well-located around the strong street hierarchy and new public spaces that would provide for a range of leisure activities. The varying heights and scale of buildings, together with provisions to secure materials and detailing that would respect the local context and nature of the development would further ensure quality and would provide for interest and character for the site. Further details of materials proposed would be secured by condition.

The development would therefore comply with relevant national, regional and local policy.

Phase 1 Development

91. Full permission is sought for Phase 1, and the detail of the development here reflects the general approach to development as established for the outline area of the site.

92. Buildings A, B and C at the west would have generally rectangular footprints. They would have an east-west orientation to align with Beresford Avenue, providing frontage to Beresford Avenue and the canal. The proposed building line would relate well to Beresford Avenue, providing a strong frontage and would respond well to the existing homes to the north. Cut-through links between buildings A, B and C would separate these proposed buildings providing a scale of building footprint that reflects the length of terrace runs to adjacent streets, as well as providing access through the site to the canal. The footprints of these buildings would also be comparable to the existing industrial buildings to this part of the site.

93. Buildings A, B and C are comprised of a part 5 storey building, and a part 8 storey building and would have a five storey façade as viewed from street level, with an increased height at the east of Building C (of 8 storeys) marking the community centre location. While these buildings would be of greater height than the existing dwellings to the north, their siting and the separation provided ensure that they would not be overbearing but would signal the gateway to the Alperton Growth Area and provide enclosure to the street. The southern parts of Buildings A and B would be single storey up to the new public realm along the canal (with podium

gardens above), providing for surveillance and activity to this space, enhancing its setting while ensuring that the development would not be overbearing to the canal or this space.

94. On part of the ground floor of Buildings A and B, there would be residential accommodation providing frontage to the street or canal, with corner flats providing surveillance of the adjacent streets. Parking would be provided within the cores of these buildings at ground floor level. Communal gardens would be provided to the south of the buildings above the parking and single storey ground floor flats that overlook the canal, benefitting from a good level of outlook and maximising daylight and sunlight to the residential units.

95. Building C at the east is proposed to open onto the 'canalside piazza' and would house the community centre and nursery at ground floor level which would create activity at this focal point of the site and provide a connection with the existing community to the north. Access to the residential accommodation above would be provided on the Beresford Avenue frontage.

96. While the proposed buildings would be different in appearance to the existing surrounding built form as a consequence of their height and design, the proposed design is considered to be acceptable. The proposed materials would reflect both the industrial and residential character of the area, and architectural detailing would include features such as balconies, soldier-courses and bays that would help to break up the massing of the buildings and add visual interest.

97. Building D at the eastern part of Phase 1 would have a larger footprint than Buildings A, B and C and would be higher, at 14 storeys. The location and design of Building D would open up space alongside Beresford Avenue to create new public realm (the canalside piazza) and provide a connection to the existing community.

98. The height and the design of Building D means it will be prominent, marking the gateway arrival point and serving to define the canalside piazza open space and commercial and community part of the development. This takes advantage of the bend of the canal and intends to draw people in to the site to use the public open space. However, as Building D is set back from Beresford Avenue and the height of the building reduces towards the north, it is considered that the scale would not become dominant or overbearing and would contribute positively to the streetscene.

99. The commercial and community uses that are proposed at ground floor level within Buildings C and D would provide natural surveillance and animation to the canalside piazza area and the Beresford Avenue frontage to the site. This activity would enhance the relationship of the site with the canal and community to the north, and would help to create an attractive place and usable public realm, representing a significant improvement over the existing site.

100. Above the ground floor level, Building D would provide residential accommodation to be arranged around a central podium which would provide a communal courtyard garden overlooking the canalside space. This arrangement would provide for surveillance of the public realm, while also maximising sunlight and views to the homes to be provided and a high quality of accommodation.

101. Variation is proposed to the massing of different elements of Building D, and there is greater articulation to the elevations through balconies, fenestration and architectural detailing which further serves to break up the scale and massing of the building and create interest. Materials proposed would comprise a limited palette of materials to create visual interest, with the brickwork proposed taking inspiration from local buildings.

102. It is therefore considered that the development proposed within Phase 1 would deliver a good quality development at this important part of the site helping the proposed new neighbourhood to integrate with the existing community, and it would also therefore comply with relevant national, regional and local policy.

Open Space and Public Realm

103. The masterplan proposal would deliver circa 4.6ha of public realm and open space, including three core public open space locations at the Central Gardens (up to 0.6 hectares), Riverside Meadows (including the Riverside Walk) (up to 0.83 hectares), and Canalside (up to 0.76 hectares).

104. The scale and layout of these spaces is considered to provide good quality spaces that can accommodate a range of uses. The sites are publicly accessible and incorporate green areas with suitable planting that provides enhanced amenity for the development and existing community. The layout and design of development would provide for surveillance of routes and open spaces with some active uses at ground floor level which would animate the spaces and encourage their use. The spaces have been designed to enhance and encourage biodiversity.

105. Children's play space to cater for younger aged groups is proposed across the site, meeting needs arising from the development and supporting the existing community as considered in more detail within the 'play and recreation' section of this report below.

106. Spaces would be managed by the applicant for the long term, ensuring their continued contribution to the site and area. The provision of open space on the site would result in a substantial increase in both the quantity and quality of open space within the area and would be supported in accordance with Brent and GLA policy.

Amenity Space

107. With regard to external amenity space, based on the proposed dwelling numbers and dwelling mix the London Plan Housing SPG identifies a requirement for 2,615sqm of amenity space to serve Phase 1 of the development and 18,407sqm across the whole site.

108. Occupants of the new homes would have access to private amenity space (balconies, terraces, front gardens) in addition to semi-private communal amenity space provided as part of the courtyard gardens located within the building plots.

109. Within Phase 1, 4,884sqm of private and semi-private amenity space has been proposed , with 37,295sqm proposed across the whole site. Therefore, the development would exceed London Plan requirements.

110. However, DMP19 of Brent's Development Management Policies requires 20sqm per 1- or 2-bedroom home and 50sqm for family housing of external amenity space. This results in a requirement for 8,040sqm to serve Phase 1 and 58,480sqm to serve the whole site. Whilst the private amenity space meets the London Plan requirements, it under provides against targets in DMP19. The shortfall for Phase 1 is 3,156sqm, and would constitute a shortfall of 21,185sqm (7.3sqm per dwelling) of amenity space across the whole site. However, each dwelling across the development would have access to an average of 12sqm of private outdoor amenity space.

111. Whilst there is a shortfall of private amenity space, the submission includes high quality, usable areas of public realm with an additional 4.6ha of public open space proposed (excluding roads) – which is a significant amount of publicly available open space within close proximity to the proposed homes. Furthermore, the site is within close proximity of other areas of public open space, notably Heather Park (<50m) and the nearby Mount Pleasant.

112. The applicants have agreed a contribution of £50,000 via the S106 obligation for improvements to existing public open space and play-space within the vicinity of the application site. The planning obligation securing improvement works is in accordance with Brent's Supplementary Planning Document 17 which states that where a proposal fails to meet the amenity space standards a S106 payment towards local open space could be acceptable. As a

result of this, the shortfall of amenity space is considered acceptable due to the close proximity of the park, and the contributions towards improvements to nearby open spaces.

113. The amenity space proposed is required to meet the needs of future occupiers of the site in line with planning policy and guidance. However, it will also be available for the existing community who would also be able to make use of the spaces.

114. The application is accompanied by an Internal Daylight and Overshadowing Report. The report considered overshadowing to external amenity spaces within the site and illustrates that the majority of amenity areas within the site would meet sunlight assessment criteria such that occupiers would have access to well sun-lit open spaces.

115. The shortfall in provision against Brent DMP targets would not result in a poor standard of amenity for future residents for the reasons given, the proposal is therefore considered acceptable.

Play and Recreation

116. The site provides publicly accessible and communal open space (which is accessible only to residents). There are three main areas of public space within the site (Central Gardens, Riverside Meadows and the Canalside). These spaces would be available to the existing and proposed community providing varied spaces and opportunities for sport, play and recreation.

117. The application includes play space throughout the site for children of all ages, comprising:

- Under 5: Doorstop play within each private courtyard, informal and equipped spaces distributed throughout the public realm.
- 5 to 11: A range of equipment to support a variety of activities, including further informal spaces within the open spaces.
- 12 plus: Social spaces to meet, hang out and take part in informal sport or physical activity, including appropriate facilities.

- The play provision strategy includes extensive playable landscapes, accessible to both disabled and non-disabled, with a variety of open space, playable features, landscape elements and formal equipment. Sculptures and water play would be located along the canal and within the public space to the south of the community centre (Phase 1), the proposed play provision is considered to be suitable to the surrounding landscape. Located within the Central Gardens there would be more active and natural play features. Within the Riverside Meadows informal play spaces and interactive sculptures would be provided in accordance with The Mayor's Housing SPG.

118. Each private courtyard includes doorstep play spaces for children under 5, and additional informal equipped play spaces are included within the public realm including adjacent to the community centre, within the Central Gardens and Riverside Meadows. The arrangement of play facilities means that all homes would be within 100m of facilities. A condition has been recommended to secure the detail of that play space, and an update to the site-wide provision of play space, through the submission of Reserved Matters applications on a phase by phase basis.

119. Five play spaces for children aged 5 to 11 have been provided adjacent to the community centre, within the Central Gardens and Riverside Meadows and include a trim trail. For children over 12, social spaces have been provided including 'kick about' space, a trim trail and an outdoor stage within three areas; adjacent to the community centre, within the Central Gardens and the trim trail along the Riverside Walk.

120. The application documents specify that the child yield of the proposed development would be 936 children, giving rise to a requirement for 9,356sqm of play space (as calculated using the Mayor's SPG calculator tool). The submitted Design and Access Statement confirms that playspace provision would exceed the required standard, providing the following:

	Detailed area requirement (sqm)	Detailed area provision (sqm)	Whole site requirement (sqm)	Whole site provision (sqm)
Under 5	246.74	480	4,865	4,975
5 to 11	108.73	265	2,900	2,999
12 plus	62.73	75	1,591	1,601
Total	418.2	820	9,356	9,575
Difference	+401.8		+219	

121. The submission demonstrates that the provision of play space exceeds Brent and Mayoral policy and guidance, and the strategy would provide for a range of spaces that would be appropriate to the site and landscape and that would meet the needs of children within the existing and new community and is supported. Further details of the play space provision would be required by condition for the detailed part of the application and as part of future Reserved Matters applications.

Townscape and Views, including the Setting of Heritage Assets

122. The Environmental Statement includes a Townscape and Visual Impact Assessment. The Visual Impact Assessment was carried out to identify and mitigate any potential visual harm that may occur as a result of the proposed development, and where there is any identified harm remaining provide a detailed justification as to why it is acceptable.

123. The assessment concludes that on completion, the effects of the development would be neutral or beneficial, with significant improvements particularly close to the site.

124. There would be no adverse impacts on any protected views as a result of the development, and while the proposals would clearly result in a significant change to the character of the site from the existing, the site does not currently make a positive visual/amenity contribution to the area and it is considered that the proposals result in a significant improvement to the local area.

125. The proposed development would also result in a much improved relationship with the canal and the River Brent as a result of the open spaces that would be delivered and the increased access to these areas and natural surveillance that would be provided. The high quality of the design demonstrated by the Phase 1 proposals and established within the Framework Design Code for the outline area, and the architectural interest and detailing of the built form together with the landscaping proposed are welcomed and would complement the local area.

126. As noted above, the development would be of a different scale to the surrounding area. However, consideration has been given to the relationship between the development and its surroundings such that it would be sympathetic to the adjacent development. The tallest parts of the development are located appropriately within the site where they would serve to enhance legibility and mark the gateway of the Alperton Growth Area and Stonebridge Park Station as well as important public spaces on the site, and they would not harm any locally protected views.

127. There are no nationally or locally designated built heritage assets on the site, although nearby the Ace Café is a locally listed building and the Brent Viaduct is a Grade II listed structure. However, the site does not currently make a positive contribution to the area and the transformation of the site through the development would significantly enhance the setting of the canal and nearby heritage assets. There would be no adverse impacts on the setting of more distant heritage assets and overall the development is considered to enhance the historic environment.

128. Given the current site condition and the effects of development as outlined above, as well as the mitigation measures comprising tree planting and hoarding of the site during construction that are identified through the Townscape and Visual Impact Assessment, it is considered that the proposals would result in an overall positive impact on the area and the proposal is supported in accordance with relevant Brent and London Plan policy.

Residential Quality and Accessibility

129. As most of the proposal is in outline there are no detailed proposals for the residential plots within this outline area. However, the Design and Access Statement advises that the proposal will be designed to deliver a high quality residential environment across the site and the quality of new homes can be assessed through the consideration of the Reserved Matters applications.

Space Standards

130. All homes within the detailed part of the development would comply with minimum space standards in the London Plan and Housing SPG. The Design and Access Statement advises that while the sizes of homes proposed to the outline part of the site would be confirmed through future Reserved Matters applications, these would meet or exceed the relevant space standards.

Aspect

131. Across the whole site, there is likely to be between 53-54% single aspect homes, with around 13% as single aspect and north facing. Future phases will require that opportunities must be taken to minimise single aspect and north facing single aspect homes, and we would expect to see an improvement on these figures when considering subsequent reserved matters applications.

132. Within the Phase 1 detailed area, 55% of homes would be single aspect, with 13% of these being single aspect and north facing. However, the scale, layout and design of these homes have been designed to ensure they would provide a good quality of residential amenity. The Internal Daylight and Overshadowing Report submitted shows that the internal daylight levels within the detailed part of the development would be acceptable for a high-density urban development, with the majority of habitable rooms achieving recommended daylight targets.

133. Phase 1 proposes 597 habitable rooms, a total of 505 of the 597 habitable rooms tested (85%) and 476 rooms (80%) will have daylight penetrating to in excess of 80% of the working plane.

134. The Design and Access Statement includes an explanation of how the number of single aspect and single aspect north facing homes was reduced as the proposals for the site evolved in order to minimise their number. The proposed development was subject to a detailed and lengthy pre-application process where the number of single aspect units were raised as unacceptable by Brent officers on several occasions. In response, the number of single aspect units was reduced.

135. In addition, while there is a relatively high proportion of single aspect homes, this is in large part as a result of the east-west orientation of buildings along the frontage of the site with Beresford Avenue. While an alternative arrangement may have resulted in a lower proportion of such homes, it is considered important that the proposed development engages with the street scene of Beresford Avenue and the existing community, as well as providing surveillance to the canal from the southern elevations of Buildings A, B and C to the detailed part of the site. These objectives would not be achieved with an alternative arrangement of development on the site.

136. On balance, given that the number of single aspect homes has been reduced as far as practicable and that the proposals have sought to avoid single aspect north facing homes; the

quality of the accommodation that would be delivered as part of the high density development; together with the benefits that the development would deliver through transformation and regeneration of the site and making effective use of the land to deliver new homes, employment and community facilities as well as open space; the development is considered to deliver an acceptable standard of amenity for future residents in accordance with relevant policy and guidance.

Noise

137. The Environmental Statement includes an assessment of potential noise and vibration impacts to and as a result of the proposed development utilising survey data and modelling. The assessment takes into account noise sources, including the surrounding road network, adjacent industrial uses, the Ace Café, proposed industrial space within the development, traffic generated by the development, and activity within the proposed community centre and commercial space.

138. This assessment indicates there is potential for noise and vibration impacts as a consequence of enabling works, demolition and construction activity. However, control measures within a Construction Environmental Management Plan (CEMP) would ensure impacts are minimised and that they would be acceptable.

139. Traffic flows from the development would not result in any significant impacts on surrounding receptors. The assessment indicates that noise from plant and equipment should be controlled through detailed design to achieve target noise levels. Further assessment would be required when detail of the nature of proposed uses and associated plant are known.

140. With regard to the impact of the existing environment on the proposed residential development, impacts from road traffic on the majority of the site would not be significant, although some properties fronting busy roads may require mitigation. Properties facing the existing Ace Café may also require enhanced glazing and ventilation to mitigate potential noise effects, although industrial uses to the west would not result in any significant impacts.

141. Noise levels would not result in significant impact to external amenity areas across the site, with the exception of a small portion of space at the east within Building Plot L with direct line of sight to the North Circular where mitigation measures are likely to be required. The need for and implementation of these can be considered as part of the detailed design of this phase.

142. Further consideration will be needed of impacts arising from the co-location of residential and light industrial space within Building Plot L to ensure suitable standards of amenity for future residents, and a scheme of sound insulation measures to address potential noise transfer between the uses within this building would be required to ensure successful co-location of the proposed uses.

143. Further details of mitigation measures to achieve appropriate noise levels across the site would be required by condition, and subject to the implementation of mitigation measures, the development would provide for an acceptable acoustic environment for future occupiers. Furthermore, the proposed use would not result in restrictions on existing operations in the area with regard to the 'Agent of Change' principle set out within Policy D12 of the draft London Plan.

144. The submission therefore demonstrates that a satisfactory environment can be provided for future residents, subject to conditions, and that there would not be unacceptable impacts on the existing area including residents and businesses. The development therefore complies with relevant Brent and London Plan policy.

Daylight and Sunlight

145. The Environmental Statement assesses daylight, sunlight and overshadowing, including the effects of the development on the surrounding area and the amenity of surrounding residential properties.

146. The assessment indicates that there are 516 windows to 217 residential rooms around the site. These were considered in terms of both vertical sky component (VSC) and no sky line (NSL) measures to consider daylight, and annual probable sunlight hours (APSH) to consider sunlight.

147. This assessment highlights that the design of the development ensures that the impact on the surrounding area has minimised the potential impact on daylight/sunlight where possible. While there would be some change from the existing situation given the currently predominantly cleared nature of the site, the arrangement of development on the site and the massing of development to the north and south boundaries of the site would minimise effects on surrounding properties while ensuring effective use of the land. Generally good levels of daylight and sunlight would be retained to surrounding neighbouring properties, and the proposed development would broadly comply with BRE guidelines for the detailed part of the application.

148. Whilst it is noted that there are some daylight reductions which exceed the BRE guidelines to existing residential properties the overall effects range from 'negligible' (to 12 properties) to 'minor adverse' (to 47 properties) when taking into account each of the methods of daylight assessment and reviewing the effects holistically. In the context of the proposed development delivering comprehensive regeneration, and considerable numbers of new homes, it is considered that the impacts on daylight/sunlight to neighbouring properties is acceptable.

149. The most significant impact on daylight/sunlight will be experienced on the properties listed below.

1 Newcombe Park - Two of the ten windows experience minor deviations from the BRE numerical targets (20-29%). In addition, all of the habitable rooms meet the BRE guidelines in terms of the NSL assessment (daylight distribution within the room) and therefore the overall effect on the daylight amenity is considered to be minor when considered against the BRE guidance, and the property would still achieve adequate levels of daylight and sunlight.

101 Beresford Avenue - two out of six windows experience VSC reductions of 26.7% and 41.15%, but are single small facets of a bay window at ground and first floor respectively, where the main window and other facet of the bay window would meet the guideline criteria. In addition, all of the habitable rooms meet the BRE guidelines in terms of the NSL assessment (daylight distribution within the room) and therefore the overall effect on the daylight amenity is considered to be minor, and therefore acceptable.

109a Beresford Avenue – one out of four windows tested would experience a minor deviation from the BRE guideline targets (29.97%) and 3 would experience moderate relative reductions of between 30.3% and 31%. It is also important to look at the retained level of absolute VSC with the proposed development in place and the 4 windows will retain absolute VSC levels of between 22.93 and 23.23, which is commensurate for an urban regeneration area. In addition, the NSL for the one room tested indicates a minor deviation from the BRE numerical targets, and therefore overall the effect on the daylight amenity is considered to be minor, and therefore acceptable.

109b Beresford Avenue – three out of four windows tested for VSC would experience fractional deviations from the numerical targets (20.32%-21.52%). In addition, the NSL indicates that the room will satisfy the guidelines in terms of daylight distribution and therefore the effect on daylight is considered to be minor, and therefore is considered to be acceptable.

109-111 Beresford Avenue – one out of nine windows tested for VSC (a small facet of a bay

window) will experience a minor deviation of the numerical targets (20.87%) with the other 2 windows serving that bay window satisfying the targets. All 4 rooms meet the NSL assessment criteria and therefore the overall effect on the daylight amenity is considered to be minor.

1-2 Craigmuir Park – 44 of 52 windows tested for VSC will meet the guidelines. Of the remaining 8 windows, 5 will experience minor deviations from the numerical targets (22.48% - 29.83%) and 3 windows experience moderate relative reductions of 30.77%, 31.03% and 31.27%. In each case, the 8 windows in question serve rooms lit by multiple other windows which would meet the BRE numerical targets, with each of the 18 rooms tested also meeting the NSL criteria. Therefore the overall effect on the daylight amenity is considered to be minor.

25-95a Beresford Avenue (inclusive) – 19 of 233 windows tested for VSC will meet the BRE guidelines. The remaining 214 windows would experience relative reductions in VSC beyond the BRE numerical targets, however it is important to note that the overwhelming majority of these windows are single facets of a multi-faceted bay window, where the main facet will retain a good level of absolute VSC for an urban regeneration area. The NSL results confirm that 77 of the 87 rooms tested will meet the BRE numerical targets for daylight distribution. The remaining 10 rooms are located within 25-33a Beresford Avenue ranging from 27.9% to 44.4%. In addition, the average daylight factor within each of the rooms tested will exceed the minimum recommended targets based upon room use, and therefore it is demonstrated that whilst there will be reductions in the existing levels of daylight amenity, there will remain a good level of daylight in these dwellings, that is in line with the impacts of an urban regeneration proposal such as this.

99 Beresford Avenue – 8 of 16 windows meet the BRE guidelines in terms of VSC. Of the remaining 8 windows, 2 would experience a minor deviation from the guideline targets (29.59% and 29.84%), 5 would experience a moderate deviation (30%- 34.6%) and 1 would experience a major deviation of 44.8%. It should however be noted that whilst there a relative reductions in VSC beyond the guideline recommendations to individual windows, they either relate to individual small facets of a bay window or serve rooms lit by multiple other windows that meet the BRE guideline targets, such that the overall effect on the room as a whole is unlikely to be noticeable. In addition, each of the 5 rooms tested will meet the NSL criteria in terms of the daylight distribution within the rooms and therefore the overall effect on the daylight amenity is considered to be minor.

107 Beresford Avenue – 10/12 windows meet the BRE guidelines in terms of VSC. The remaining 2 windows experience moderate deviations of the numerical targets of 31.85% and 34.83%. In both instances, the retained absolute levels of VSC are 23.09 and 25.76 which are commensurate with an urban regeneration area. In addition, the NSL assessment criteria is met for each of the 7 rooms tested and so the overall effect on the daylight amenity is considered to be minor.

Prospect House – 6/36 windows tested meet the BRE guideline recommendations for VSC. Whilst the remaining 30 windows experience relative reductions of between 30.9% and 38.32%, the rooms retain absolute VSC levels between 20.26% and 26.66%, which are commensurate with an urban regeneration area. In addition, each of the rooms tested for NSL will meet the BRE guideline recommendations in terms of daylight distribution within the rooms and therefore the overall effect on the property is considered to be minor.

150. Overall, there will be a negligible effect on the sunlight amenity to each of the residential properties assessed, and that when considered against the benefits of the proposed development this effect is considered to be acceptable.

151. The Internal Daylight and Overshadowing Report confirms the Average Daylight Factor (ADF) results as a total of 505 of the 597 habitable rooms tested (85%) across Phase 1 of the Proposed Development will achieve the recommended ADF targets for their relevant room uses.

152. The No-Sky-Line (NSL) results confirm that 476 rooms (80%) will have daylight penetrating to in excess of 80% of the working plane.

153. An Internal Daylight and Overshadowing Report indicates that the internal daylight levels within the detailed part of the development would be acceptable within a high-density urban development with the majority of habitable rooms achieving recommended daylight targets, and the majority of amenity areas would also meet sunlight assessment criteria such that occupiers would have access to well sun-lit open spaces. The development would not result in harm to the canal or River Brent by reason of overshadowing or impact on light levels.

154. The quality of light within and surrounding the development is considered to have been maximised where possible and would achieve standards commensurate with a high density urban development, and with regard to the need to make efficient use of the site the impacts on the surrounding area are on balance considered to be acceptable. The development would therefore ensure the amenity of these surrounding uses in accordance with Brent and London Plan policy.

Residential Density

155. The site currently has a varying PTAL rating of between 0 (very poor) at the west of the site, increasing towards the east to a rating of 3 (moderate). The proposed development has a density of 317 units/hectare or 873 habitable rooms/hectare across the whole site, with a density of 225 units/hectare or 599 habitable rooms/hectare for the detailed part of the site at the north-west.

156. These are above the suggested densities in the current London Plan, however the Plan also advises that it is not appropriate to apply this table mechanistically, and account should be taken of factors relevant to optimising housing potential including local context, design and transport capacity as well as social infrastructure. The draft London Plan further emphasises at Policy GG2 the need to create high-density, mixed use places that make the best use of land, and draft Policy D6 advises that development proposals must make the most efficient use of land and be developed at the optimum density.

157. As noted above, the site is within the Alperton Housing Zone which is seeking to accelerate the delivery of housing, and where higher densities of development would therefore be expected and it is also at the edge, but still within, the Alperton Growth Area. In addition, the site has an acceptable level of access to the public transport network, and the proposed development would deliver improvements to connectivity for pedestrians and cyclists, and by increasing bus numbers, increasing access to public transport. The applicants have agreed to provide a commuted sum to allow TfL to improve bus capacity/frequency along Beresford Avenue, and have agreed to provide a commuted sum to provide for additional gateline capacity at Stonebridge Park Station. The PTAL rating across the site would therefore be increased slightly, and as a consequence the site is in a location where a higher density of development is considered appropriate.

158. The proposed density of development would be greater than residential areas to the north, however the site is previously under-developed and the proposal represents a major opportunity for regeneration and the provision of new homes. The density varies across the site in response to the surrounding context, for example with generally lower densities to buildings at the north closest to Beresford Avenue which assists the proposed development to sit comfortably within its context.

159. It is therefore considered appropriate that the capacity for residential development on the site has been optimised in accordance with London Plan objectives, and the density proposed further allows for the inclusion of a range of uses to support a sustainable community as well as generous areas of public realm on the site that would not otherwise be achievable.

160. As such, the development would make efficient use of the site taking into account local

context, character and design principles as well as accessibility and the sustainable location of the site to provide a high quality new community, and the resulting density is considered acceptable in accordance with national, London and Brent planning policy objectives.

Transport and Movement

Parking

161. DMP 12 (Parking) and Appendix 1 of Brent's DM Policies would allow up to 3,222 residential car parking spaces, with a further 95 spaces allowed for the employment uses.

162. The overall level of parking proposed is 1,528 spaces, which is within the maximum allowances prescribed in policy and is therefore acceptable. The operation of an annual parking permit system for residents, to manage allocation of spaces, through the Car Parking Management Plan is welcomed.

163. In line with the draft London Plan, it is proposed that parking for at least 3% of dwellings is provided as Blue Badge parking at the outset (i.e. 87 spaces) and the car park design is to be reviewed to establish how this can best be provided, secured by a condition.

164. The Car Parking Management Plan monitoring and management system will then be used to ensure appropriate provision of Blue Badge parking continues to be provided (up to a maximum of 10% of dwellings) as the development is built out and occupied. This is acceptable.

165. To mitigate potential overspill parking problems being created in the area, funding of £750,000 is secured to enable a CPZ to be introduced in the Heather Park Drive/Woodstock Road area. This has been agreed as phased payments (£150k at the outset and a further £600k in the event that a CPZ is approved) and is to be included in the S106 Agreement.

166. The scheme will be 'permit free', so future occupiers will not be entitled to on-street parking permits in the event that a CPZ is introduced in the area, which will provide Brent Council with the ability to ensure overspill parking from the site onto adjoining streets can be regulated.

Parking - Phase 1

167. 237 parking spaces (12 Blue Badge) are proposed for Phase 1. The overall parking ratio within the undercroft area in this part of the site is considered to be acceptable, and 12 disabled spaces have been provided at the outset in line with emerging London Plan guidance.

168. The 18 external car parking spaces will be for use by customers and visitors on a pay and display basis. The bays will not be on the public highway, so will be managed and maintained by the applicant. Parking charges will be finalised through the Car Park Management Plan.

Cycle Storage / Parking - Phase 1

169. The residential bicycle parking requirement is 648 long-term spaces, plus ten short-term spaces. Plans have been submitted showing three stores for the westernmost blocks and two stores for Block D comprising a total of 726 secure bicycle parking spaces on a two-tier system, which satisfies the requirements for long-term residential bicycle parking.

170. At least 35 external bicycle stands need to be provided within the landscaped areas for short-term visitor and commercial parking. The applicants have confirmed that 36 spaces will be provided, with 26 of these spaces being within 10m of a building entrance.

171. 721 cycle spaces are proposed as part of Phase 1, comprising of 658 for residential uses, 8 for employment uses, up to 37 for commercial uses and 18 for leisure and community uses, therefore satisfying the requirements as set out above.

Cycle Storage / Parking - Later Phases

172. Details of cycle parking will be submitted as reserved matters applications for each block. The applicant has confirmed that they are also considering the implications for the scheme of adopting the proposed increased cycle parking requirements set out in the current draft London Plan.

Delivery and Servicing

173. Concerns were initially raised by officers on delivery arrangements and the shortcomings of the Delivery & Servicing Plan in managing these. The applicant has since confirmed that the final Delivery & Servicing Plan will proactively manage delivery movements and will work to minimise any problems arising through lack of co-ordination of movements. This is welcomed and a condition requiring that updated versions of the Framework Delivery & Servicing Plan be approved with the opening of each phase of the development is recommended.

174. The applicant has also acknowledged that the development should not be over-reliant upon servicing from Beresford Avenue and that provision of loading bays along Beresford Avenue will be a matter to be agreed with the Council as Highway Authority when finalising the proposed S278 works in the street.

175. In this respect, details of the proposed highway works along Beresford Avenue, including widening of the highway in order to accommodate a 5m wide footway/cycleway fronting the development, inset parking and loading bays, planting, speed tables, pedestrian crossing facilities and repositioned bus stops to suit the access arrangements are being prepared, and would be conditioned accordingly. The works will need to be secured through a S38/S278 Agreement through the Highways Act 1980 and should be phased alongside each development plot.

176. Similarly, the improvements along the stretch of Old North Circular Road between the site and Stonebridge Park station to increase footway/verge widths are also in the process of being designed in greater detail for approval, secured in the legal agreement. These will also need to be included in a S278 Agreement and it is anticipated that these works will be delivered in Phase 1.

Street Layout

177. The proposed hierarchy of streets is welcomed in terms of providing good permeability through the site and over the River Brent via existing bridges, and the introduction of an additional crossing over the River Brent adjacent to the proposed 'Generator' building is welcomed. Minor comments were raised during the application process regarding some restricted footway widths and limited turning facilities and on the latter point, the applicant has drawn attention to the tracking diagrams provided in the original Delivery & Servicing Plan, which are considered to be acceptable.

178. More detailed highway layouts for each plot will in any case be provided as each phase of the development comes forward and a condition is recommended requiring these details to be approved as reserved matters.

179. Concerns have been raised with regard to the connectivity of the site to the Grand Union Canal towpath opposite the development and in particular the desire to provide a replacement

footbridge over the canal following the removal of the existing obsolete bridge at the site.

180. A new pedestrian/cycle bridge from the site over the river Brent between the proposed residential led part of the application site and the proposed 'Generator', which would link in with the existing pedestrian pavement network, and cycle routes would provide an additional link for pedestrians and cyclists over the river, and towards the existing pedestrian/cycle bridge over the North Circular Road and on to major employment destinations within Park Royal and the Old Oak Common redevelopment area. This would also link to the proposed HS2 and Crossrail station which would if delivered provide a major transport hub within the wider area.

181. The applicants have provided indicative proposals for an additional pedestrian/cycle link across the Grand Union Canal, however the land required to link the bridge to the towpath on the south side of the canal is not within the applicant's control and it is therefore considered unreasonable to require this to be delivered directly by the applicant through the S106 Agreement. Nevertheless, an area of land within the applicants control would be safeguarded in order to ensure a bridge link could come forward in the future. This safeguarding would be included in the legal agreement.

182. As an item of transport infrastructure though, a bridge link would be covered within Brent's CIL 123 list and so would be eligible for CIL funding. It is therefore recommended by Highways Officers that high priority be given to the delivery of a new footbridge linking the site to the canal towpath as land becomes available on the opposite side of the canal, subject to funding being agreed. It is recommended that an area of land measuring 10m x 40m is safeguarded alongside the canal for this purpose for a minimum period of 25 years following completion of phase 2.

183. It has also been suggested that any new towpath provided along the site frontage extends to the southern site boundary, so that it could potentially be extended further southwards should redevelopment of the Twyford Tip site on the opposite side of the North Circular Road come forward in future. This may also widen the possibilities for the alternative canal bridge options suggested in earlier comments. The applicant has therefore agreed to investigate this as part of the detailed design for phase 2 and details can be approved through any future reserved matters application for the plot.

184. Wycombe Road, a 134m long adopted cul-de-sac (accessed from Beresford Avenue) which previously served part of the industrial estate, would need to be stopped up as public highway to facilitate this development through S247 of the Town & Country Act 1990. This will allow the road to be removed and new buildings to be provided on the land it currently occupies. Two new access roads along Beresford Avenue would be provided in order to provide access to service vehicles, the underground car parking, the proposed street network and for emergency services.

185. In conclusion, the overall masterplan is acceptable from a Highways and Transport perspective, subject to conditions covering approval of further details of highway layouts, car and cycle parking and servicing arrangements for each phase as it comes forward, plus the contribution towards a CPZ, a 'car (permit)-free' agreement, Car Park Management and Delivery & Servicing Plans and safeguarding of land for a future footbridge over the canal.

Highways and Transport - Phase 1

186. With regard to servicing, it is confirmed that further details of how use of the loading bays will be controlled will be provided through the Delivery & Servicing Plan.

187. There is a conflict on the submitted plans between the vehicle tracking and soft landscaping at the turning head adjacent to Block D. This has been acknowledged and will be addressed as the detailed landscaping design is progressed, and would be subject to condition.

188. The applicant has noted the concerns of officers over the use of shared surface routes around residential blocks by commercial service vehicles, but does not propose to alter this arrangement. However, this arrangement affects only the internal estate roads and proposed future residents of the development, occurs on private estate roads rather than adopted highway, and would not affect the neighbouring existing residential population or wider area; impacts can, to an extent, be mitigated. The Delivery & Servicing Plan should review these arrangements as the development is built-out.

189. For the nursery, comments regarding the impracticality of providing dedicated nursery spaces on Beresford Avenue have been acknowledged and the applicant is investigating whether dedicated spaces might be accommodated within the site. Nevertheless, the provision of short-term pay and display parking and/or loading bays along the widened and enhanced Beresford Avenue is a matter that can be agreed as and when any proposals for a CPZ come forward.

190. In terms of access arrangements, concerns were originally raised regarding the excessive width of the main access and the impact this has on footway widths. Although the carriageway width has not been altered, an amended junction layout has been submitted that repositions the pedestrian refuge back 1m from Beresford Avenue and incorporates a raised speed table/entry treatment to enhance pedestrian safety. It also shows a combined footway/verge width of 5m along the access road, thus providing space to increase the footway width if necessary to accommodate future footfall. The access arrangements are therefore now considered to be acceptable.

Transport Assessment

191. A strategic highway model for the area has been developed in conjunction with Transport for London's Highway Modelling Team, and the outputs approved by TfL. This SATURN model has assigned the forecast vehicular trips to and from the development (218 arrivals/308 departures in the morning peak hour (8-9am) and 400 arrivals/276 departures in the evening peak hour (5-6pm)) on the local road network for the predicted year of completion of 2041.

192. The model shows that (upon completion of the Generator) the majority of traffic (50%-66%) arriving and leaving the site would use the North Circular Road, with more limited volumes of traffic on Beresford Avenue (115 vehicles in the morning peak hour & 195 in the evening peak hour) to the west of the site and on Abbey Road (77 in the morning peak hour and 52 in the evening peak hour) to the south.

193. The impact of these increased flows on junction capacity has then been assessed for road junctions in the vicinity of the site.

194. Junctions onto the North Circular Road fall within the remit of Transport for London. The modelling suggests that in the absence of any optimisation of the signal timings, there would be a tangible increase in delay (i.e. greater than 10 seconds) on at least one arm of the North Circular Road/Abbey Road and North Circular Road/Hanger Lane junctions during either the morning or evening peak hours or both.

195. Of these two junctions, the development is forecast to have the greatest impact at the Abbey Road/North Circular Road/Old North Circular Road junction. Mitigation options are currently being developed to improve the operation of the junction, which will then need to be agreed with Transport for London and Brent Council. A clause in the S106 Agreement requiring an appropriate mitigation scheme for this junction to be identified and implemented should therefore be secured, which has been agreed by TfL, Brent Highways and the applicant.

196. For junctions that fall within the remit of Brent Council as Local Highway Authority, no

future capacity problems were identified at the existing junction of Beresford Avenue and Old North Circular Road.

197. However, the modelling results do show a tangible increase in delay (i.e. greater than 10 seconds) on at least one arm of both the Mount Pleasant/Ealing Road and Ealing Road/ Bridgewater Road signalised junctions during either the morning or evening peak hours or both. Existing capacity issues were also identified at the junction of Ealing Road and Carlyon Road, which may also be worsened by this proposal.

198. Initial modelling results had suggested that optimisation of signal timings could improve the performance of these junctions (particularly Mount Pleasant/Ealing Road) to cater for future traffic increases. However, further detailed junction capacity assessments do need to be undertaken for these three junctions to identify appropriate mitigation measures.

199. In this respect, Brent Council's own Transport Assessment of the Alperton area Housing Zone has considered potential mitigation measures for local highway junctions.

200. In the case of the Ealing Road/Bridgewater Road junction, this included the inclusion of a separate left-turn indicative arrow phase from Bridgewater Road into Ealing Road (N), as well as widening the Ealing Road (N) arm to accommodate a right-turn flare land of 30m length. The first of these measures could be accommodated easily, but the second would require third-party land, so could not be delivered at the present time.

201. For the Mount Pleasant/Ealing Road junction, no mitigation beyond signal optimisation was considered to be necessary at the present time, but there is a desire to improve pedestrian crossing facilities in the longer term.

202. For the Carlyon Road/Ealing Road junction, removal of the egress phase from the Ford car dealership onto the junction, so that exiting vehicles would have to leave that site via Glacier Way, was identified as offering an improvement to junction capacity.

203. To address the above, the applicant has agreed to undertake further local junction modelling work for the junctions of (i) North Circular Road/Abbey Road, (ii) Ealing Road/Mount Pleasant, (iii) Ealing Road/Bridgewater Road, (iv) North Circular Road/Hanger Lane, (v) North Circular Road/Harrow Road and (vi) Ealing Road/Carlyon Road to identify appropriate mitigation measures. Funding of junction improvements up to a maximum of £400,000 to implement any agreed measures will also be provided.

204. With regard to public transport impact, a number of mitigation measures have been identified as appropriate by Transport for London.

205. In terms of bus services, the extension of route 83 along Mount Pleasant and Beresford Avenue to serve the site and Stonebridge Park station, together with an increase in the frequency of route 112, have been identified as being cost effective means of improving the connectivity of the site and boost its PTAL rating. Funding of £4.7m towards these service improvements has been agreed for inclusion in the S106 Agreement.

206. For rail services, an increase in the gateline capacity at Stonebridge Park station has been identified as being necessary. This has been agreed to in principle, but the costing of the work is currently subject to ongoing discussion and finalisation as to an appropriate sum to enable the works to be undertaken. The applicant has therefore agreed to fund a study into this and to pay towards the works up to a £2m, in agreement with TfL. This issue would be resolved through detailed discussion ahead of the signing of any relevant Section 106 agreement.

207. Other future improvements to the facilities at the station and to accommodate step-free access were identified as being desirable, but as yet no funding for such measures has been agreed.

Travel Plans

208. To help to minimise car journeys and encourage greater use of sustainable transport to and from the site, both a Residential Travel Plan and a Framework Travel Plan for the non-residential uses have been prepared.

209. Both aim to reduce the proportion of trips made by car from 22% to 14% over a five-year period. Please note though that the development is proposed to be built-out over a 20-year timeframe, so the Travel Plans need to have a corresponding 25-year minimum lifespan in order to ensure they continues to be applied throughout all phases of the build programme.

210. The Travel Plans are to be managed by a site-wide Travel Plan Co-ordinator (with support from tenant Travel Plan co-ordinators for the major commercial units) and will include a range of measures to support sustainable travel.

211. For the residential travel plan, these include the provision of marketing information and welcome packs to publicise transport options and highlight the health and financial benefits of walking and cycling, the promotion of walking and cycling events, provision of broadband to reduce the need to travel, promotion of car sharing and the introduction of Car Club bays. No information has been provided on any engagement with a potential Car Club operator though to ensure that the requisite financial support will be provided to establish Car Club vehicles on the site and to this end, it is essential that at least two years free membership of the Car Club is offered to all new residents of the development to help to make a scheme viable.

212. The commercial travel plan proposes the provision of transport information through company websites and noticeboards, engagement is promotional walking and cycling campaigns, promotion of journey planning websites and support for car sharing. The measures are fairly limited though and include no mention of encouraging the provision of interest-free loans to staff for bicycle purchase or public transport season tickets, whilst also making no mention of how car parking within the commercial premises will be managed.

213. The Travel Plans are to be monitored biennially and for the avoidance of doubt, the surveys need to be to a standard compatible with the TRICS and/or i-TRACE methodology.

214. Final versions of the Travel Plans will need to be approved as the development progresses and these are to be secured through the S106 Agreement.

Construction Logistics

215. A Framework Construction Method Statement and Logistics Plan has been submitted with the application.

216. In terms of transport of materials to the site and waste from the site, no mention is made of the potential for using the Grand Union Canal in order to reduce lorry movements. This should at least be investigated with the Canals & Rivers Trust before it is ruled out.

217. Otherwise, working hours over the course of the 19-year programme are proposed to stick to the standard 8am-6pm on weekdays and 8am-1pm on Saturdays.

218. Delivery vehicles will be routed to the site via North Circular Road, Beresford Avenue and Wycombe Road, which is welcomed. This will ensure large delivery vehicles do not need to travel too far along Beresford Avenue past residential properties. Materials can then be transported within the site to the relevant building plot. It might also be beneficial to make such a facility available to other developers in the area.

219. An initial estimate of delivery vehicle movements suggests that the peak period (in about

2027-28) would see 32 vehicles arrive per day (64 movements), which is not significant enough to cause concern as long as the proposed routing is strictly adhered to. No mention is made at the current time of pre-booking deliveries though, either to avoid peak hours or to spread arrivals out across the day.

220. Otherwise, there is no suggestion at this stage that any road closures will be required, with the site being securely hoarded along its boundary. It is confirmed that wheel washing equipment will be provided.

221. The applicant has confirmed that the above comments will be considered when producing the final Construction Plans for approval.

Accessibility and inclusive design

222. As highlighted by the Mayor's Accessible London SPG, development should implement inclusive design principles to create an accessible environment. The Design and Access Statement advises that the creation of an inclusive environment is an aspiration for the development and inclusive access would be considered through the design process.

223. As noted above, the development would result in a significant improvement to connectivity in the area, including through the pedestrian and cycle routes that would be created through the site and the improvements that are proposed to routes within the surrounding area. Public spaces that are proposed within the site would include recreational routes, and these spaces and paths through the site would serve the existing and new community. Where there are changes in land levels, the Design and Access Statement notes that any ramps would have a gradient of no more than 1:20 and would not be excessively long. Approaches to buildings would comply with regulations and best practice guidance, and there would be provision of level access to building lobby areas. Corridors would be of sufficient widths with suitable turning locations for those who are mobility impaired, and lifts would be provided to all residential floors which would be wheelchair accessible.

224. Across the site, 90% of the dwellings are proposed to be designed and built to Building Regulations Approved Document M4(2) 'accessible and adaptable dwellings' standard, and 10% would be designed and built to Part M4 (3) 'wheelchair user dwellings' standard in accordance with London Plan standards at Policy 3.8. Appropriate disabled parking provision would also be included as considered above.

225. The proposals would therefore ensure that accessible and adaptable accommodation and space are provided within the development and would meet the principles of inclusive design. The proposals therefore comply with Brent and London Plan policy regarding accessibility and inclusive design

Microclimate – Wind Environment

226. The submitted ES includes an assessment of wind and microclimate impacts. The assessment utilised a scaled physical model of the development and involved testing of the existing site and proposed development within a wind tunnel to consider the wind conditions around the development. Assessment was made against the 'Lawson Comfort Criteria' to establish whether the resulting wind conditions would be suitable for the proposed use.

227. The submission confirms that the wind conditions surrounding the site would be similar to existing. For the detailed part of the development, wind conditions are shown to range from being suitable for sitting to being suitable for walking during the windiest season, and the amenity spaces would be suitable for standing and sitting uses within the summer season. For the outline part of the development, wind conditions would range from being suitable for sitting use to strolling use during the windiest season, and the amenity spaces would be suitable for standing and sitting uses within the summer season.

228. Although there would be potential for stronger winds for short periods of time at certain

locations within the site, mitigation measures have been identified by the applicants including provision of landscaping and screens to some balconies within the detailed part of the proposals for the development. The incorporation of these measures within the proposals means that the development would provide a suitable standard of comfort for pedestrian uses and in public spaces intended for amenity use.

229. The detailed design of the outline part of the development as well as the potential need for any mitigation measures here would be considered as part of future reserved matter applications. The ES assessment provided by the applicants highlights that this is likely to include mitigation measures to the west of Plot H, however, further assessment would be necessary and would be required as part of these future Reserved Matters applications.

230. Overall, it is considered that the development would provide for usable pedestrian environments and amenity space and the wind microclimate would be acceptable for the intended use subject to the implementation of the limited mitigation measures that are identified and which have been included within the detailed part of the development. There would not be unacceptable harm to the amenity of surrounding land or buildings, and the development would be acceptable including in relation to Policy 7.6 of the London Plan.

Air Quality

231. The site is located within an Air Quality Management Area (AQMA). The ES includes an assessment of air quality and potential impacts both during construction and once the development is operational, as well as the requirement for any mitigation measures.

232. The assessment shows that subject to adequate ventilation design to the basement parking (which would affect the outline development area of the site), air quality on the site would be suitable for end users without any requirement for specific mitigation measures. The design requirement for the ventilation to the basement parking would form part of a future Reserved Matters application, at which time measures would be incorporated to ensure that air quality requirements are met.

233. On completion of the development, the ES assessment shows that potential emissions from the resulting road traffic and from the proposed energy centre would not result in any significant impact on air quality, with dispersion modelling demonstrating that the height of the stack proposed to serve the energy centre would be adequate so as not to result in exceedance of air quality objectives.

234. An additional Air Quality Neutral Assessment considered the development with regard to air quality neutral objectives set out within the Mayor's Sustainable Design and Construction SPG. Off-setting provisions such as green walls planting and screens to absorb or suppress pollutants would be considered as part of the development in line with provisions of the SPG.

235. During construction works, construction impacts including through dust would be managed through inclusion in the Construction Environmental Management Plan (CEMP) that is to be produced, and this would ensure that there are no significant air quality impacts during development.

236. As a result, it is considered that air quality impacts to and as a result of the development are acceptable in accordance with national policy in the NPPF, as well as local and Mayoral policy requirements.

Energy

237. The Planning Statement supporting the application advises that the development is designed to meet sustainable construction standards, and the submission includes an Energy Statement. This explains in detail how the development would meet relevant requirements in relation to energy efficiency and energy supply. The assessment shows that the development would make significant carbon dioxide savings over target rates which would be achieved

through energy efficiency measures, the use of combined heat and power, and inclusion of solar photovoltaic (PV) panels to Building Plot N on the southern part of the site.

238. The Energy Statement highlights that energy demands of the development have been reduced by measures including through the materials to be used; air tightness; ventilation system selection; efficient space and water heating; efficient lighting; and consideration within the design and layout to mitigate overheating risks.

239. The potential for connection of the site to existing district heat networks was considered as is required by London Plan Policy 5.6. However, there are no existing networks in proximity to the site. The proposals do nevertheless include a site wide heat network, with a decentralised Energy Centre. This would supply heat from the central energy centre proposed beneath Building D which would accommodate a Combined Heat and Power (CHP) facility.

240. The scope to incorporate renewable energy technologies has been considered by the applicant. This assessment indicated that PV panels would be suitable, although the brown roofs proposed to the majority of the site were considered to reduce the area that these would be appropriate. However, PV panels are proposed to Building Plot N on the southern part of the site where there would be no conflict with brown roofs and where the energy demands from this building (which is to be in employment use) would predominantly be during the day, coinciding with the peak generation times.

241. These measures would result in anticipated carbon dioxide savings of 42.9% for the residential development and 35.1% for the non-residential development, equivalent to 41.9% overall. This would exceed the requirements of the London Plan, and remaining domestic carbon dioxide emissions would be offset in accordance with the Mayor's Housing SPG, with this offset to be secured via a s106 agreement.

242. The GLA have noted that the development would broadly follow the energy hierarchy, although further details were requested to verify the findings of the Energy Statement and the applicant has provided details as requested. The development would therefore meet relevant energy targets, subject to planning obligations being secured, and is acceptable in accordance with Brent and London Plan policies.

Sustainability

243. In addition to the measures that would ensure energy targets are met, sustainability has been considered throughout the design of the development as set out within the submitted Sustainability Statement which includes discussion of the sustainable design and construction methods, energy and water saving measures, waste reduction techniques and measures to enhance the ecological value of the site that are to be incorporated as part of the development.

244. The Statement highlights the sustainable location of the site with access to public transport and connections for walking and cycling, and notes that through the development there would be significant improvements to existing routes on the site and in the area promoting sustainable transport options. The range of uses that are proposed as part of the development would also help to meet day-to-day needs of the existing and proposed community in the area, reducing the need to travel.

245. Provision for waste and recycling would be made both to serve all future occupiers, and as part of the construction works on the site. Sustainable construction methods would also be utilised including consideration for the selection of materials and management of construction impacts.

246. Surface water would be managed within the site using SuDS, and in addition to energy saving measures as noted above, the applicants have confirmed that flow control devices and water efficient fixtures and fittings would be installed to all homes, targeting a minimum water

efficiency standard of 105 litres/person/day. All homes would also be provided with a 'Home Information Manual' that would provide advice and information on operating services within the homes in order to reduce energy and water use. Commercial units would similarly be provided with guidance to reduce their energy and water demand.

247. Brown roofs are proposed to large proportions of the site, and these would provide a range of sustainability benefits including localised cooling and management of surface water, and they would also provide ecological habitats. However, full details of these roofs would be secured by condition 16 and/or reserved matters application(s).

248. A Dynamic Overheating Assessment has been submitted for the detailed area of the development and indicates how overheating risks have been minimised through design measures including solar control glazing and natural and mechanical ventilation to result in an acceptable level of overheating against relevant criteria without the need for air conditioning systems. The layout also avoids excessive solar gains for non-residential uses and these principles would be carried forward to the design of the later phases of development. The GLA requested further details to confirm that comfort recommendations would be met which have been provided by the applicant, and the development is therefore considered to effectively manage potential risks of overheating.

249. The Sustainability Statement notes that the proposed commercial units would achieve a minimum of BREEAM 'Very Good' standard rather than 'Excellent' as is targeted by Core Strategy Policy CP19. The applicants have argued that this is because these units would be shell only with the detailed fit out being managed and implemented by the future tenant and therefore it would not be technically feasible to achieve 'Excellent' standard in full, although the majority of requirements would be met and the design of the floorspace would not prevent achievement of 'Excellent' standard in future. Officers have confirmed to the applicant that the ability to meet BREEAM 'Excellent' is still achievable (as the delivery of the units must only not impede the delivery of an 'Excellent' rating), and therefore the requirement for all non-residential floorspace to meet BREEAM 'Excellent' is included in the Heads of Terms for the Section 106 agreement as proposed.

Ground Condition, Soils and Contamination

250. The site is previously developed and the past use as an industrial estate together with nearby uses could have resulted in contamination. The Environmental Statement supporting the application therefore includes a full assessment of ground conditions and the potential for any impacts.

251. This assessment demonstrates that there are potential sources of contamination from contaminated soils, made ground, buried infrastructure and organic soils that could result in ground gas or soil vapour concentrations. However, implementation of a Construction Environmental Management Plan (CEMP) during construction works would ensure that there are no unacceptable impacts to the surrounding environment or to ground workers. In addition, provision would be made for remediation as part of the development which would mean that there would be no residual risk to future occupiers, and the risk to the environment would be reduced in comparison to the existing site circumstances. Measures to manage ongoing risks of contamination would be provided such as well-maintained petrol and oil interceptors. The ES therefore demonstrates that the development would achieve safe and suitable conditions for end users and that potential risks during construction works would be managed.

252. The London Plan supports remediation of contaminated land and making beneficial use of such sites, and the reduced risk of contamination and pollution from the site would be a further potential benefit of the proposals being brought forward on the site.

253. The Environmental Health Officer has advised that the submitted reports provide a comprehensive review of previous site investigations and provide details of additional site investigations undertaken. However, further investigation and updated risk assessment to

reflect current guidance are required and conditions are recommended.

254. The development also includes restoration works to the waterside edges of the application site, and further details of measures to ensure ground stability as part of these works would be required by condition.

255. Appropriate measures would therefore ensure that the development would not activate or spread contamination to the surrounding environment, or in land instability, and there would be no unacceptable risk to future occupiers. The land would therefore be suitable for the intended use. Implementation of necessary measures, including for management of works and provision for remediation would be secured by condition, and on this basis the development would be acceptable in accordance with relevant policies.

Flood Risk and Run-Off

256. The majority of the northern part of the application site is Flood Zone 1 (low probability of fluvial flooding), although there is an area of Flood Zone 2 (medium probability) at the lower lying north eastern part of the site. The southern part of the site is within Flood Zone 3a (higher probability), with an area of Flood Zone 3b (functional flood plain) at the south. There is a low probability of surface water runoff flooding to the site.

257. National and local policy require that development does not increase flood risk and that development is resilient to flooding. The NPPF also requires a sequential approach to steer development to areas with the lowest probability of flooding.

258. The application is supported by a Flood Risk Assessment which includes a Sequential Test Assessment, and a Drainage Strategy. The Flood Risk Assessment demonstrates how the potential risk of and from flooding for the proposed development has been considered, and illustrates how the development would increase flood storage capacity on the site. Flood resilience and resistance measures have been identified and would ensure that the development is safe.

259. Within the site, the proposed layout responds to flood risk with residential development (which is more vulnerable to flood risk) to the northern part of the site within Flood Zones 1 and 2 and with uses at ground floor level generally comprising less vulnerable commercial uses. Employment uses which are less vulnerable would also be accommodated on the southern part of the site, although no built structures are proposed within the Flood Zone 3b functional floodplain area.

260. The Sequential Test Assessment report has considered the potential to accommodate the development proposed on sites at lower risk of flooding, and it is considered that the submitted report does demonstrate that there would be no sequentially preferable sites to accommodate the development. The proposal therefore satisfies the requirements of the Sequential Test set out within national policy and guidance.

261. While the Environment Agency initially sought further detail around the provision of flood compensation measures, following clarification from the applicant the Environment Agency have no objection to the development on flood risk grounds.

262. The Environment Agency did also request further information in relation to the potential bridge to be provided across the River Brent to demonstrate that it would be possible to meet standards required in order to address flood risk and ecology considerations. However, the bridge is within the outline area of the proposed development and details of this would form part of future Reserved Matters applications. At that time, the design of any bridge to be brought forward would be considered in accordance with relevant standards, requirements and best practice in place at that time.

263. While the desire of the Environment Agency to consider details of a bridge at this time is

acknowledged, it is not considered that there would be any impediment that would mean standards could not be met at the appropriate time, and the bridge is not essential to achieving the overall development on the site. The detail can be fully considered, including with regard to specifications to meet requirements around flood risk and ecology, once there is clarity over any bridge being proposed.

264. With regard to surface water on the site, the Drainage Strategy submitted with the application illustrates that the development would incorporate a SuDS strategy. This would provide betterment to the existing discharge rates from the site by restricting surface water flow to three times greenfield runoff rate; a substantial reduction on the existing site circumstances. While the underlying geology means that surface water ground infiltration techniques cannot be used, the development incorporates swales and permeable paving to manage flows, and modular attenuation tanks would be provided to control discharge rates. Although it was initially proposed that surface water would be discharged to the River Brent and Grand Union Canal, discharge to the canal is no longer proposed. Provision would be made for pollution control and for management and maintenance of the drainage network and SuDS systems which would ensure protection for the environment and the long-term performance of the drainage network.

265. The Lead Local Flood Authority have confirmed that the main site falls within Flood Zone 1 and the risk of flooding is low. The River Brent is in very close proximity and the flood risk is high at this location. The development floor levels would be much higher than the flood level. The developer are reducing the surface water discharge from 2200 l/sec to 125 l/sec and this would reduce the flood risk in this area. Therefore, they are satisfied with the proposals.

266. As such, the development proposed would make adequate provision for the management of flood risk and surface water within the site and there would not be unacceptable impacts to the surrounding area. The proposals are therefore acceptable in accordance with national, local and Mayoral policy requirements.

Fire Safety

267. Policy D11 (Fire Safety) of the emerging London Plan (draft, December 2017) seeks to ensure that new development is designed to incorporate appropriate features which reduce the risk to life in the event of fire, are constructed in a way to minimise the risk of fire spread, provide suitable means of escape and adopt a robust strategy for evacuation.

268. The applicants have provided a fire strategy which seeks to address the points raised above.

269. Firstly, the applicants have confirmed that all the proposed residential units (including the affordable housing) will be fitted with fire detection systems and sprinklers, and all corridors would be fitted with smoke extraction systems. The proposed basement(s) will also be fitted with a fire detection and alarm system.

270. The proposed external facades would predominantly be predominantly brick, and would incorporate non-combustible insulation.

271. The applicants have confirmed that a full fire evacuation strategy would be provided for all residents on a building by building, phase by phase basis.

272. With regard to emergency vehicle/fire apparatus access, access points are proposed to be located within 18m of the main entrance to each residential core, with fire hydrant points located within 90m of inlets, in line with LFB guidance. The proposed vehicular access across the development would allow for fire apparatus access to within the vicinity of all the proposed buildings.

273. The London Fire Brigade were consulted, however no response has been received.

Nevertheless, approval by the Fire Brigade would be required through the Building Regulations and for the purpose of this planning application, there is no reason to believe that the layout of the development could not achieve compliance. The London Fire Brigade would also be consulted on any subsequent Reserved Matters application.

Waste Water

274. There is a network of sewers serving the existing site, and in addition to surface water as considered above, the submitted Drainage Strategy Report provides details of how foul water would be managed within the development.

275. The Strategy advises that the proposals for waste water have considered existing capacity in the area, with the Phase 1 development intended to discharge to the public foul sewer in Beresford Avenue and the remainder of the site to discharge to the Brent Valley trunk sewer (northern site), and the public sewer adjacent to the River Brent (southern site). Thames Water have not raised an objection to the application but have advised that the existing foul water network requires upgrading to accommodate the full needs of the development and have recommended conditions to provide for details of phasing of development and provision for supporting infrastructure.

276. Thames Water have also requested further details of piling works on site during construction to ensure that there is no impact on existing underground sewage infrastructure, and informatives are also suggested.

277. Subject to recommended conditions, the development would ensure appropriate provision is made for waste water and is acceptable in accordance with local and Mayoral policies.

Archaeology

278. A Desk-Based Archaeological Assessment was submitted as part of the applicants Environmental Statement. This highlighted that the site was considered to have low archaeological potential, including as a consequence of the past use of the site and associated ground disturbance and that while there could be previously unknown archaeological remains, these are likely to be of low importance. During the course of the application, a further Geoarchaeological Deposit Report was submitted in response to comments from Historic England on the application. This report provided further evidence to support the initial conclusions of the Desk-Based Assessment as to the archaeological potential of the site. Historic England have now confirmed that the development is unlikely to have a significant effect on heritage assets of archaeological interest, and no further assessment or conditions are necessary.

279. The development would not therefore require any archaeological mitigation, would not cause harm to archaeological assets, and complies with relevant policies.

Ecology and Nature Conservation

280. The application is supported by Ecological Baseline Reports including an Ecological Update and Preliminary Ecological Appraisal, Aquatic Ecology Baseline Report, and Reptile Method Statement which also form part of the submitted ES.

281. These reports highlight that the site currently has limited ecological habitats and biodiversity value, with habitats restricted to scattered trees. However, the site is adjacent to the River Brent and Grand Union Canal which are both designated as Sites of Importance for Nature Conservation (SINCs). The submitted assessments recognise the potential for impacts of development on these, and also illustrate the potential for enhancement arising as a consequence of the proposed development.

282. During the development process, mitigation measures are proposed to ensure that there would be no harm to ecology. These would include avoiding harm to reptiles, managing

invasive species, and consideration for the aquatic environment, and further details of measures would be provided through method statements.

283. The development includes extensive areas of landscaping and open space provision, together with planting that would all provide for increased opportunities for biodiversity. The provision of extensive areas of brown roofs would further support ecology on the site. As part of the development, there would be works to restore the waterside edges of the site and significant areas of habitat creation are proposed to be concentrated within the corridors of the River Brent and canal, including the Riverside Meadows area at the east which is proposed to include a range of appropriate species. These improvements are welcomed and would improve the contribution of the site to the ecological value of the local area.

284. The development proposals would therefore maintain and enhance biodiversity and ecology on the site and would comply with relevant national requirements and local and Mayoral policy.

Trees

285. The application is supported by an Arboricultural Impact Assessment which considers the impact of the development on existing trees on the site. This assessment indicates that these existing trees are of varying quality with none of the highest quality (category A).

286. The development proposals would result in the removal of trees and hedgerows from the site, including 31 trees subject to a Tree Preservation Order (TPO). However, only one of these is category B tree with the rest being category C, of low quality or value. Where trees are to be retained, the Assessment indicates there would be protection provided to ensure their longevity.

287. While trees would be removed from the site, the development includes for significant replacement planting as part of the extensive landscaping proposals which is welcomed. This would comprise species appropriate to the site and area, and the proposed replacement trees would make a positive and longer-term contribution to the local landscape.

288. Given this mitigation and the enhancement of the site and wider Beresford Avenue through the significant new tree planting, the removal of the proposed trees is acceptable and complies with relevant Brent and Mayoral policy.

Operational Waste

289. The application is accompanied by an Operational Waste and Recycling Management Strategy which provides details of the estimated waste arising from the development and of how these would be managed.

290. The Strategy aims to contribute to national and local targets for waste minimisation, recycling and reuse, achieve high standards of waste and recycling performance and provide a convenient, clean and efficient waste management strategy for the site.

291. The Strategy estimates that the detailed part of the development would produce approximately 1,106 tonnes of waste per year. Estimates are also provided for the outline element of the site; however, these would be subject to the actual detail of development as it comes forward.

292. The Strategy advises that full provision for storage of recyclable and non-recyclable waste would be made for the development, including for mixed dry recyclables, food waste and residual waste. There would be communal stores to the residential areas, and further stores for non-residential uses that would enable and promote recycling.

293. For the outline area, details of provision would be provided as part of future applications.

For the detailed part of the application, residential waste stores are proposed within the ground floors of Buildings A, B and C. There would also be a store within the basement level to Building D, with chutes provided from the ground floor of this building. Waste from Buildings A, B and C would be collected from the stores, while the site management team would transfer waste from Building D to a central store ready for collection. Storage would also be provided within each non-residential plot, with a further dedicated store within Building D. The Strategy advises that the internal management team would collect waste from the individual non-residential units and transfer it to a central store ready for collection. This central store would be located within the outline part of the application site, although a temporary store would be provided until the permanent facility is delivered.

294. The Operational Waste and Recycling Management Strategy provides capacity to manage waste as part of the development in accordance with requirements, and is considered acceptable. Full details of the provision to be made for the outline element of development would be provided as part of future Reserved Matters applications.

Operational Waste for Phase 1

295. With regard to refuse storage and collection Blocks A, B and C all have integrated waste storage and collection points accessed from Beresford Avenue, residents would be expected to empty their own private bins by accessing the communal bin store from their homes, either via foot or by the internal lifts.

296. With regard to block D residents would empty their private bins into schutes provided at ground floor level which would connect to the waste storage area in the basement. On collection day the bins located at basement level would be transferred to ground floor level for collection from a dedicated collection point. However, the permanent collection point for Block D would be located at the base of buildings G and H in Phase 4. In the interim, a temporary location for the collection day storage for Block D is confirmed as being between future Blocks G & H, which will allow easy access by refuse vehicles from the primary estate access road whilst not obstructing movement through the site.

297. The site management company will be responsible for moving bins from this area on collection days. With regard to block D It is acknowledged that an alternative temporary location will be required in future whilst Blocks G & H are constructed and this can be identified at the appropriate time, and details provided as part of the relevant Reserved Matters application.

298. The number of bins shown in Phase 1 will provide storage capacity for 71,358 litres of waste, based upon British Standard BS5906:2005. However, this falls some way short of the total requirement for 95,046 litres for Phase 1 calculated using Brent's Waste and Recycling Storage and Collection Guidance.

299. The applicants have argued that LBB's own guidance is based on a higher proportion of family sized units, and as their proposed development is a mixed-use scheme, with a higher proportion of one and two bedroom units. As such, the applicants have argued that their calculation based against the British Standard would be sufficient for Phase 1. While the proposed waste storage would not comply with LBB guidance, it is in this instance considered that due to the higher percentage of one and two bedroom units, the proposed 71,358 litres of waste storage is considered to be acceptable, and in this instance due to the reasons set out above the Council's Waste Management officers consider this to be appropriate.

300. To ensure this would work in practice, a condition is recommended to secure a Waste Management Scheme be provided to, and approved by the Local Planning Authority for each relevant building/phase. A further condition is recommended to ensure that later phases are in accordance with Brent's Waste Planning Guidance, unless otherwise agreed in writing by the Local Planning Authority.

Site Waste Management Plan

301. In addition to waste once the development is occupied, the proposal would result in generation of waste during the construction process. The submitted Sustainability Statement advises that a Site Waste Management Plan would be prepared prior to construction to establish ways to minimise waste at source, consider reuse and recycling of materials both on and off site and prevent illegal waste activities.

302. The Sustainability Statement states that as part of their commitment to divert construction waste from landfill, the applicant would monitor and record performance against a target benchmark of at least 85% non-hazardous waste (by volume) to be diverted from landfill. Waste minimisation measures that may be considered to achieve this are highlighted as opportunities to reduce and avoid waste from excavation or groundworks; design standardisation of components and use of fewer materials; design for off-site or modular build; return of packaging for reuse; community reuse of surplus materials; and engaging with supply chains and including waste minimisation incentives and targets in tenders and contracts.

303. These measures would minimise the generation of waste during construction work and would reduce the impact of development on natural resources, and are supported.

Secured by Design

304. The applicant has engaged during pre-application with the Secured by Design Officer, which is welcomed. As the majority of the application is made in outline, details of the proposed buildings within this outline area are not available. However, the submitted Design and Access Statement explains how the masterplan for the site designs out opportunities for crime, antisocial behaviour, and criminal and terrorist risks, and highlights how future specific measures have been incorporated within the detailed proposals at the north west part of the site.

305. The principles of Secured by Design have been applied to the proposed development and measures incorporated include ensuring that the proposed routes, including pedestrian and cycle routes, through the site form a network to avoid the creation of dead-ends; that parking areas are safe and secure; and that boundaries between public and private areas are clearly defined. The development provides for a range of uses across the site that ensure activity throughout the day as well as providing for surveillance of both the routes through the site and the areas of public realm and open space. At ground floor level, there would be active frontages with fenestration and doors facing onto all areas to provide activity and surveillance. The increased surveillance of the canal in comparison to the existing situation is also a benefit of development coming forward as has been recognised by the consultation response of the Canal & River Trust.

306. The Design and Access Statement also advises that residential glazing and doors would be Secured by Design standard, and notes that the inclusion of ground floor commercial units mean that there would be a buffer to upper levels of residential accommodation within buildings. Where ground floor uses would be residential, there would be defined curtilages to the front of properties to create a sense of ownership, and where there are ground floor windows planting has been designed to achieve separation for residents and deter breaking and entering.

307. Entrances to buildings, residential cores and entrances into the main public areas of the site would be well lit, and public areas would also be covered by CCTV. The design of public areas as shown for the detailed part of the site has considered the positioning of seating to concentrate this in those areas with high footfall and surveillance and away from residential properties in order to reduce potential for any disturbance.

308. These measures would all serve to reduce crime and the fear of crime, antisocial behaviour and criminal and terrorist risks, and the applicant intends that further discussions with the

Secured by Design Officer would be held to inform the detailed design of future phases of the development. The development would therefore provide for a safe, secure and accessible environment that would comply with national and Mayoral policy seeking to ensure quality of life and community cohesion, and is therefore supported.

S106 DETAILS

The application requires a Section 106 Agreement, in order to secure the following benefits:-

1. Payment of the Council's legal and other professional costs on completion of the deed in (i) preparing and completing the agreement and (ii) monitoring its performance;

2. Notification of material start 28 days prior to commencement;

3. Join and adhere to Considerate Constructors scheme;

4. The Owner will provide a minimum of 35% of the dwellings (by habitable room) within the Development as Affordable Housing;
    a. Tenure
        i. 70% Affordable Rented Units at a rent of no more than 80% of local open market rent (including service charge where applicable) and capped at Local Housing Allowance rates;
        ii. 30% Shared Ownership / Intermediate Units to be affordable to people on incomes at or below the GLA London Plan intermediate income threshold;
    b. Freehold (or minimum 125 year leasehold) disposal of all Affordable Units to an approved Registered Provider;
    c. 100% Council nomination rights to all Affordable Rented Units on first lettings, 75% nomination rights on subsequent lettings, secured under appropriate Nominations Agreement;
    d. No more than 50% of the Private Dwellings per Phase shall be occupied until the Affordable Housing has been constructed and transferred to an approved RP (freehold or 125 year lease). Ready for occupation prior to 70% of Private Dwellings being occupied;

5. Sustainability / Carbon
    e. To provide for easy connection to a Decentralised Heat / Energy Network should one be implemented in the area in the future;
    f. All residential units will be constructed to be compliant with minimum standards for water consumption (105 litres/person/day);
    g. All residential units to meet zero carbon target (off-site energy efficiency measures or a cash-in-lieu payment for failure to meet);
    h. All non- residential units to achieve a 35% reduction in carbon emissions over Building Regulations Part L 2013 (off-site energy efficiency measures or a cash-in-lieu payment for failure to meet);
    i. Payment of initial carbon offset contribution and if required, final carbon offset contribution.

6. Health Care Facility
    a. The developer will provide up to 800sqm (GIA) of fitted out health centre floorspace (GP Surgery) prior to Occupation of 600 units, unless otherwise agreed in writing by the LPA. The final quantum of floorspace, specifications of the fit out and commercial terms must be agreed by the CCG and the Council.

7. Training and employment
    a. To prepare and gain approval of an Construction Employment and Training Plan prior to Commencement of Development;

b. Reasonable endeavours obligation to meet the Local People Employment Target;
   (i) 20 Dwellings; or
   (ii) 1,000 sq m (GEA) of new commercial and employment floorspace; or
   (iii) 1,000 sq m (GEA) of new education, healthcare and community floorspace; or
   (iv) 1,000 sq m (GEA) of new assembly and leisure space.).
c. To prepare and gain approval of an Operational Employment and Training Plan 6 months before Practical Completion of the relevant phase;
d. Reasonable endeavours obligations to notify Brent Works and employ 20% Local People in operational phase; and
e. Report 3 months from Practical Completion of the relevant Phase.

1

1. Employment
   a. Minimum 17,581sqm (GIA) permanent floorspace quantum across entire site and a minimum 1,390 sqm (GIA) temporary floorspace (unless otherwise agreed in writing by the LPA), referred to as the 'Creative Quarter'. The permanent floorspace will be delivered as follows:
      i. A minimum of 12,023 sqm (GIA) permanent floorspace by Phase 3;
      ii. The remaining employment floorspace, to total 17,581 sqm across the site in total, shall be delivered by Phase 6;
   b. A minimum of 1,390 sqm (GIA) of temporary floorspace referred to as the Creative Quarter will be made available for Occupation no later than 12 months post Commencement of Superstructure Works of Phase 1;
   c. The provision of 341 sqm GEA of permanent 'Affordable Workspace' (Use Class B1) at no more than 50% of the market rate in perpetuity, prior to the occupation of 600 units;
   d. Employment Management Strategy required for the affordable employment floorspace.

2. Construction residential, employment and commercial travel plans required.

3. CPZ Contribution
   e. A contribution of £150,000 to be paid towards new and extended CPZ's in the vicinity of the site prior to Commencement of Development;
   f. A further £600,000 contribution to be paid when called for by the Council (after Commencement of Development) in the event that a CPZ scheme (new or extension) is approved for implementation.

4. Bus Service Contribution

   g. A contribution of £4.7 million to be paid towards the provision of bus service improvements in the vicinity of the Development.

5. Stonebridge Park Station Contribution
   a. A contribution of £90,000 towards a feasibility study in respect of Stonebridge Park Station to be paid prior to Commencement of Development;
   b. A contribution of up to £2 million to be paid towards improvements to gateline capacity at Stonebridge Park Station, to be paid before commencement of development of Phase 2.

6. Parking Permit Restriction
   a. A parking permit restriction agreement withdrawing the right of future occupiers of the development to on-street parking permits.

7. Highway Works

a. Improvement works to Beresford Avenue;
b. Improvement works to route to Stonebridge Station. To be delivered prior to the occupation of Phase 1;
c. Entry into s278 / 38 agreement(s) as required;
d. Safeguarding of land for a period of 25 years following completion of Phase 2 in location of originally proposed New Footbridge across the Grand Union Canal close to the southwestern corner of the development site to link the site to the canal towpath. Requirement to offer to transfer the safeguarded land to the Council at nil consideration upon the Council's request.
e. Undertaking of local highway junction modelling modelling to the satisfaction of TfL and Brent Council at the following junctions, unless otherwise agreed as unnecessary by TfL and Brent Council:

1. A406 – Abbey Road
2. Ealing Road – Mount Pleasant
3. Ealing Road – Bridgewater Road
4. A406 Hanger Lane Junction
5. A406 – A404 Harrow Road
6. Ealing Road – Carlyon Road

f. Funding of mitigation measures identified through the junction modelling and agreed by TfL and Brent Council as being required as a result of the development, up to £400,000.

1. Public Open Space
   a. A contribution of £50,000.00 towards improvements to existing public open space and play-space within the vicinity of the application site.
   b. Delivery, maintenance and management of the Open Space and Public Realm

2. Other
   a. Public Art Strategy required;
   b. Any other as deemed necessary during the planning application process.

CIL DETAILS

This application is liable to pay **£9,351,774.95*** under the Community Infrastructure Levy (CIL).

We calculated this figure from the following information:

Total amount of eligible** floorspace which on completion is to be demolished (E): 15822 sq. m.
Total amount of floorspace on completion (G): 45959 sq. m.

Use	Floorspace on completion (Gr)	Eligible* retained floorspace (Kr)	Net area chargeable at rate R (A)	Rate R: Brent multiplier used	Rate R: Mayoral multiplier used	Brent sub-total	Mayoral sub-total
Dwelling houses	42203		27674.0531995909	£200.00	£35.15	£7,733,909.51	£1,359,234.60
Shops	1261		826.88389651646	£40.00	£35.15	£46,216.90	£40,613.10
Businesses and offices	729		478.032006788659	£40.00	£35.15	£26,718.57	£23,478.95
Non-residential institutions	708		464.261537457299	£40.00	£35.15	£25,948.90	£22,802.60
Assembly and leisure	1058		693.769359646642	£40.00	£35.15	£38,776.75	£34,075.07

BCIS figure for year in which the charging schedule took effect (Ic)	224	224
BCIS figure for year in which the planning permission was granted (Ip)	313	
Total chargeable amount	£7,871,570.63	£1,480,204.32

*All figures are calculated using the formula under Regulation 40(6) and all figures are subject to index linking as per Regulation 40(5). The index linking will be reviewed when a Demand Notice is issued.

Eligible means the building contains a part that has been in lawful use for a continuous period of at least six months within the period of three years ending on the day planning permission first permits the chargeable development.

Please Note : CIL liability is calculated at the time at which planning permission first permits development. As such, the CIL liability specified within this report is based on current levels of indexation and is provided for indicative purposes only. It also does not take account of development that may benefit from relief, such as Affordable Housing.

DRAFT NOTICE

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

DECISION NOTICE – APPROVAL

Application No: 18/0321

I refer to your application dated **24/01/2018** proposing the following:

Hybrid planning application for the redevelopment of Northfield industrial estate:

Outline planning permission for the demolition of existing buildings and structures on the site, all site preparation works and redevelopment to provide new buildings ranging from 35.75m AOD to 111.95m AOD in height, with a total floorspace (GEA) of up to 309,400 sq m (excluding basement up to 42,000 sq m GEA) to accommodate 2,900 homes (Use Class C3), business and storage and distribution (Use Classes B1a, B1c and B8), commercial (Use Classes A1, A2, A3, A4 and A5), community and leisure (Use Classes D1 and D2) including community centre and nursery, new basement level including energy centre, associated storage, cycle and vehicle parking, new vehicular accesses, associated highway works to Beresford Avenue, landscaping and creation of new public and private open space, ancillary facilitating works, various temporary meanwhile uses, interim works and infrastructure.

Full planning permission for demolition of existing buildings and structures on the site, all site preparation works and the development of Phase 1 (Buildings A, B, C and D ranging from 1 to 14 storeys in height) to comprise 400 homes (Use Class C3); 910 sq m (GEA) of business floorspace Use Class B1a); 1,290 sq m (GEA) of commercial floorspace (Use Classes A1, A2, A3, A4 and A5); and 1,610 sq m (GEA) of community and leisure floorspace (Use Classes D1 and D2), including a community centre and nursery; together with new basement level including energy centre, associated storage, cycle and vehicle parking, new vehicular accesses, associated highway works to Beresford Avenue, landscaping and creation of new public and private open space, ancillary facilitating works, various temporary meanwhile uses, interim works and infrastructure.

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

at **Former Northfield Industrial Estate & units 2-18 Beresford Avenue & Abbey Works Estate, Wycombe Road, Wembley, HA0 & Ace Corner & Capital House, North Circular Road, London, NW10**

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

Date: 06/07/2018

Signature:

Alice Lester

Alice Lester
Head of Planning, Transport and Licensing

Notes

1. Your attention is drawn to Schedule A of this notice which sets out the rights of applicants who are aggrieved by the decisions of the Local Planning Authority.

2. This decision does not purport to convey any approval or consent which may be required under the Building Regulations or under any enactment other than the Town and Country Planning Act 1990.

DnStdG

SUMMARY OF REASONS FOR APPROVAL

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

National Planning Policy Framework (2012)
The London Plan (2016)
Brent Development Management Policies (2016)

1 The detailed element of the development hereby authorised must be begun not later than the expiration of 3 years from the date of this permission, failing which the permission shall be of no effect.

Reason: This condition is imposed by virtue of the provisions of the Planning & Compulsory Purchase Act 2004 and to prevent the accumulation of unimplemented planning permissions.

2 The development hereby permitted shall be carried out in accordance with the following approved drawing(s) and/or document(s):

Original Plans – received on 25th January 2018

Proposed Demolition Plan	139809_A_P009 Rev A
Phase 1 Detailed Component Existing Site Plan	139809_A_P101 Rev A
Building C Proposed Roof Plan	139809_A_P128 Rev A
Building C Elevations	139809_A_P131 Rev A
Building C Section	139809_A_P136 Rev A
Building D Proposed Basement Plan	139809_A_P140 Rev A
Building D Proposed Ground Floor Plan	139809_A_P141 Rev A
Building D Proposed First Floor Plan	139809_A_P142 Rev A
Building D Proposed Second Floor Plan	139809_A_P143 Rev A
Building D Proposed Third Floor Plan	139809_A_P144 Rev A
Building D Proposed Fourth Floor Plan	139809_A_P145 Rev A
Building D Proposed Fifth Floor Plan	139809_A_P146 Rev A
Building D Proposed Sixth Floor Plan	139809_A_P147 Rev A
Building D Proposed First Floor Plan	139809_A_P142 Rev A
Building D Proposed Second Floor Plan	139809_A_P143 Rev A
Building D Proposed Third Floor Plan	139809_A_P144 Rev A
Building D Proposed Fourth Floor Plan	139809_A_P145 Rev A
Building D Proposed Fifth Floor Plan	139809_A_P146 Rev A
Building D Proposed Sixth Floor Plan	139809_A_P147 Rev A
Building D Proposed Seventh Floor Plan	139809_A_P148 Rev A
Building D Proposed Eighth Floor Plan	139809_A_P149 Rev A
Building D Proposed Ninth Floor Plan	139809_A_P150 Rev A
Building D Proposed Tenth Floor Plan	139809_A_P151 Rev A
Building D Proposed Eleventh Floor Plan	139809_A_P152 Rev A
Building D Proposed Twelfth Floor Plan	139809_A_P153 Rev A
Building D Proposed Thirteenth Floor Plan	139809_A_P154 Rev A
Building D Proposed Roof Plan	139809_A_P155 Rev A
Building D Proposed North Elevation	139809_A_P160 Rev A

Building D Proposed East Elevation	139809_A_P161 Rev A
Building D Proposed South Elevation	139809_A_P162 Rev A
Building D Proposed West Elevation	139809_A_P163 Rev A
Building D Proposed North Courtyard Elevation	139809_A_P164 Rev A
Building D Proposed East Courtyard Elevation	139809_A_P165 Rev A
Building D Proposed South Courtyard Elevation	139809_A_P166 Rev A
Building D Section	139809_A_P167 Rev A
Phase 1 Softworks: The Gateway	139809C/P/LA/(93)301 Rev A

Revised Plans – received on 11th June 2018

Phase 1 Detailed Component Proposed Ground Floor Plan in Context 139809_A_P102 Rev B

Phase 1 Detailed Component Proposed Site Plan	139809_A_P103 Rev B
Buildings A - C Proposed Ground Floor Plan	139809_A_P120 Rev C
Buildings A - C Proposed First Floor Plan	139809_A_P121 Rev B
Buildings A - C Proposed Second Floor Plan	139809_A_P122 Rev B
Buildings A - C Proposed Third Floor Plan	139809_A_P123 Rev B
Buildings A - C Proposed Fourth Floor Plan	139809_A_P124 Rev B
Buildings A + B Roof Plan / Building C Fifth Floor Plan	139809_A_P125 Rev B
Building C Proposed Sixth Floor Plan	139809_A_P126 Rev B
Building C Proposed Seventh Floor Plan	139809_A_P127 Rev B
Building A Elevations	139809_A_P129 Rev B
Building B Elevations	139809_A_P130 Rev B
Buildings A - C North and South Elevations	139809_A_P132 Rev B
Buildings A - D Beresford Avenue Elevations	139809_A_P133 Rev B
Building A Section	139809_A_P134 Rev B
Building B Section	139809_A_P135 Rev B
Phase 1 General Arrangement Rev B	139809C/P/LA/(92)200
Phase 1 Hardworks Rev B	139809C/P/LA/(92)201
Phase 1 Softworks: Buildings A-C Rev B	139809C/P/LA/(93)300
Phase 1 Softworks: Internal Streets Rev B	139809C/P-LA/(93)302
Phase 1 Softworks Trees Rev B	139809C/P/LA(93)303

Other Documents:

Asbestos Survey Report received on 7th June 2018.

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

3 The relevant phase of the development as hereby permitted shall not commence until the Reserved Matters of the relevant phase of the proposed development have been submitted to and approved in writing by the Local Planning Authority. The reserved matters comprise the following:

(a) Layout;
(b) Scale;
(c) Appearance;
(d) Access;

(e) Landscaping.

Reason: These details are required to ensure that a satisfactory development is achieved.

4 All applications for Reserved Matters pursuant to Condition 2 shall be made to the Local Planning Authority, before the expiration of 20 years from the date of this permission.

Reason: To comply with Section 92 of the Town and Country Planning Act 1990 and since a period of 20 years is considered to be a reasonable time limit in view of the extent and timescale of the proposal.

5 The development to which this permission relates shall begin not later than whichever is the later of the following dates: (a) expiration of three years from the date of this outline planning permission or (b) the expiration of two years from the date of approval for the final approval of reserved matters, or in the case of different dates, the final approval of the last such matter to be approved.

Reason: To comply with Section 92 of the Town and Country Planning Act 1990.

6 The outline development hereby permitted shall be carried out in accordance with the following approved drawing(s) and/or document(s) unless otherwise agreed in writing by the LPA:

- Parameter plans:

Planning Application Boundary Detailed and Outline Components 139809_A_P001
Proposed Ground Floor Plot Extent 139809_A_P002
Proposed First Floor and Above Plot Extent 139809_A_P003
Proposed Movement Plan within the Site 139809_A_P004
Proposed Building Heights 139809_A_P005
Proposed Open Space 139809_A_P006
Lower Ground Floor Extent 139809_A_P007
Proposed Ground Level Heights 139809_A_P008

- Framework Design Code January 2018
- Planning Development Specification January 2018

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

7 Prior to the commencement of development hereby approved, a phasing plan showing the location of phases shall be submitted to the Local Planning Authority. The phasing plan shall be updated as necessary.

Reason: To allow the Local Planning Authority to understand the relevant phase of development that is subject to condition discharge and/or reserved matters.

8 Prior to the commencement of works on a relevant part of the development hereby approved, a CIL chargeable developments plan, including projections for the commencement and completion of development, as it relates to that part of the development shall be submitted to the Local Planning Authority.

Reason: To define the extent of a CIL phase for the purposes of the CIL Regulations 2010 as amended.

9 Any plant shall be installed, together with any associated ancillary equipment, so as to minimise the transmission of noise. The rated noise level from all plant and ancillary equipment shall be equal to background noise level when measured at 1m from the window of the nearest noise sensitive receptor unless otherwise agreed in writing by the Local Planning Authority. Prior to the installation of plant, an assessment of the expected noise levels of any plant shall be submitted to and approved in writing by the Local Planning Authority. The assessment shall be carried out in material compliance with BS4142:2014 'Methods for rating and assessing industrial and commercial sound.' and shall include any mitigation measures necessary to achieve the above required noise levels. The plant shall thereafter be installed and maintained in accordance with the approved details.

Reason: To protect acceptable local noise levels in the interest of the amenities of sensitive uses, and in accordance with Policy 7.15 of the London Plan (2016)

10 A scheme of sound insulation measures to address potential noise transfer between Class B1c and B8 uses and residential uses within the building shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of works on the superstructure of buildings that include both B1c and/or B8 uses and residential uses. The approved measures shall thereafter be implemented in full.

Reason: To protect acceptable local noise levels in the interest of the amenities of sensitive uses, and in accordance with Policy 7.15 of the London Plan (2016)

11 Part A: Prior to the commencement of each phase of the development hereby approved, except for site preparation works, details of the sound attenuation to protect against externally generated (environmental) noise sources so as to achieve the internal ambient noise levels detailed in BS8233:2014 shall be submitted to and approved in writing by, the Local Planning Authority. The measured or calculated noise levels shall be determined in accordance to the latest British Standard 8233:2014 Guidance on sound insulation and noise reduction for buildings. These criteria apply with windows shut and with an appropriate ventilation system installed. Any mechanical ventilation system shall not give rise to a noise level greater than the above internal noise standards or a sound level in any 1/3 octave band in the range 50Hz to 8Hz that is more than 5dB above immediate adjacent 1/3 octave bands.

Part B: The approved works are to be completed prior to occupation of the residential development for that phase and retained for the lifetime of the development for that phase.

Part C: Prior to first occupation of the development, a Post Completion Report demonstrating compliance with the mitigation measures in A above shall be submitted to and approved in writing by the Local Planning Authority for that phase.

Reason: In order to safeguard the amenities, health and safety of neighbouring properties and occupiers and of the area generally, and to ensure compliance with Policy 7.15 of the London Plan (2016).

12 The relevant phase of the development hereby approved shall not commence unless a site investigation is carried out and remediation strategy is prepared by an appropriate person in accordance with of BS 10175:2011 + A2:2017 and ‘Model Procedures of for the Management of Land Contamination – Contaminated Lane Report 11’ (CLR 11) (or other such updated British Standard) to determine the nature and extent of any

contamination present. The investigation and strategy shall be carried out in accordance with a scheme, which shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of works for that relevant phase of the development, that includes the results of any research and analysis undertaken as well as details of remediation measures required to contain, treat or remove any contamination found.
If during works new areas of contamination are encountered, which have not previously been identified, then the additional contamination shall be fully assessed and an appropriate remediation scheme agreed with the Local Planning Authority unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure the safe development and secure occupancy of the site proposed for use in accordance with Policy 5.21 of the London Plan (2016)

13 Prior to first residential occupation of a relevant phase, or the commencement of the use within the relevant part of the development hereby approved, a verification report written by a suitably qualified person in accordance with of BS 10175:2011 + A2:2017 and 'Model Procedures of for the Management of Land Contamination – Contaminated Lane Report 11' (CLR 11) (or other such updated British Standard) must be submitted to and approved in writing by the Local Planning Authority stating that remediation has been carried out in accordance with the remediation scheme approved pursuant to condition 13 and the site is safe for end use.

Reason: To ensure the safe development and secure occupancy of the site proposed for use in accordance with Policy 5.21 of the London Plan (2016).

14 The development hereby permitted shall be in accordance with the private residential mix unless otherwise agreed in writing with the Local Planning Authority:

Site Wide Private Residential Mix

Size	**No of Homes**	**%**
Studio	189	10
1 bed	564	30
2 bed	661	35
3 bed (+)	471	25
Total	1885	100

Reason: To ensure that the Development is undertaken in accordance with the approved drawings and documents and the assessed Environmental Statement.

15 Prior to the commencement of works on the superstructure of a relevant phase hereby approved, a scheme for the landscape works and treatment of that part of the development shall be submitted to and approved in writing by the Local Planning Authority. The approved details shall be fully implemented prior to the earlier of first occupation or first use of the relevant phase of the development or in accordance with a programme agreed in writing with the Local Planning Authority. Such a scheme shall include:

a) a planting plan (including species, plant sizes and planting densities);
b) details of root management systems for all trees;
c) proposed walls and fences, indicating siting, materials and heights;
d) any proposed contours and ground levels;
e) areas of hard landscape works and external furniture, and proposed materials;
f) the detailing and provision of green/brown roof(s);

g) Details of the proposed arrangements for the maintenance of the landscape works; and,
h) Details of the proposed lighting design and arrangements for these areas.

Any tree or shrub that is part of the approved scheme that, within a period of five years after planting, is removed, dies or becomes seriously damaged or diseased, shall be replaced in the next planting season with others of a similar size and species in the same positions, unless the Local Planning Authority first gives written consent to any variation.

Reason: To ensure a satisfactory appearance and setting for the proposed development, to ensure that it enhances the visual amenity of the area and to ensure a satisfactory environment for future residents, occupiers and other users

16 Prior to the commencement of works for each phase excluding site preparation works, details of the design, implementation, maintenance and management of the sustainable drainage scheme for each phase shall be submitted to, and approved in writing by, the Local Planning Authority. Those details shall include:

i) Information about the design storm period and intensity, discharge rates and volumes (both pre and post development), temporary storage facilities, means of access for maintenance, the methods employed to delay and control the surface water discharged from the site and the measures taken to prevent flooding and pollution of the receiving groundwater and/or surface waters;
ii) Any works required off-site to ensure adequate discharge of surface water without causing flooding or pollution (which should include refurbishment of existing culverts and headwalls or removal of unused culverts where relevant);
iii) Flood water exceedance routes, both on and off site;
iv) A timetable for its implementation, and
v) A management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by an appropriate public body or statutory undertaker, management and maintenance by a Residents' Management Company or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime.

Once approved, the scheme shall be implemented, retained, managed and maintained in accordance with the approved details.

Reason: To prevent the increased risk of flooding, to improve and protect water quality, improve habitat and amenity, and ensure future maintenance of the surface water drainage system in accordance with Policy 5.13 of the London Plan.

17 A minimum of 10% of all residential units hereby approved shall be provided as wheelchair easily adaptable accommodation (Part M4(3)(2)(a)) for residents who are wheelchair users unless otherwise agreed in writing by the Local Planning Authority. Reserved matters applications that include such accommodation shall demonstrate that these minimum targets will be achieved.

Reason: To ensure that the development is suitably accessible.

18 Applications for the approval of Reserved Matters relating to phases that include residential floorspace (Use Class C3) shall demonstrate how the design standards set out in the Mayor of London's Housing SPG 2016 are met for the residential development, unless otherwise agreed with the Local Planning Authority, to ensure that a good standard of residential accommodation is provided.

Reason: To ensure a satisfactory standard of residential accommodation.

19 Prior to the commencement of works to the superstructure on the relevant phase of the development as hereby permitted, excluding site preparation works, details of the following as they relate to that part of the development shall be submitted to and approved in writing by the Local Planning Authority, either within the Reserved Matters applications (if specifically referenced within that submission) or under separate cover unless otherwise agreed in writing with the Local Planning Authority.

a) Details of materials for all external surfaces, including samples which shall be made available for viewing on site or in another location as agreed;
b) Details of any plant, including locations, external appearance and any proposed screening;
c) Details of any CCTV; and,

The approved details shall be implemented in full prior to first occupation or use of the relevant part of the development.

Reason: To ensure a satisfactory development, in the interest of residential amenity, design quality and visual appearance, highway flow and safety and sustainable development.

20 Prior to commencement of works to the superstructure within a relevant phase of the development as hereby permitted excluding site preparation works, details of the following as they relate to that part of the development shall be submitted to and approved in writing by the Local Planning Authority, either within the Reserved Matters applications (if specifically referenced within that submission) or under separate cover unless otherwise agreed in writing with the Local Planning Authority.

a) Highway, footpath and cycle way layout, within the relevant phase of the development including connections and traffic management measures, sub-surface details, surfacing materials and street furniture;
b) Details of cycle storage, including the number of spaces (which shall accord with London Plan 2016 standards), structures, layout, equipment, access, security and weather proofing appropriate to the type of cycle storage;
c) Details of any motorcycle and car parking provision, including layouts, . Cumulative (site-wide) parking provision to include disabled parking provision comprising 5% of allocation for residential parking spaces and 10% allocation for commercial premises;
d) Details of electric vehicle charging points, which shall comprise a minimum of:
    i. 20% of car parking spaces with active and 20% with passive charging points for residential development;
    ii. 20% active and 10% passive for office development;
    iii. 10% active and 10% passive for retail parking spaces; and
    iv. 10% active and 10% passive for leisure.

Reason: To ensure compliance with policy DMP12.

21 Part A: Prior to the commencement of works to the superstructure within a relevant phase of the development as hereby permitted, excluding site preparation works and Phase 1, an updated air quality assessment and air quality neutral assessment shall be submitted and approved by the Local Planning Authority in line with national best practice guidance and other guidance provided by/or published by the Local Planning Authority and the Greater London Authority (GLA) for that phase unless otherwise

agreed in writing with the Local Planning Authority.

Part B: All mitigation measures as identified within the approved air quality assessment and air quality neutral assessment that are to be installed during the course of the development for the relevant phase shall be carried out in full in relation to the relevant part of the development.

Part C: All measures identified within the approved air quality assessment and air quality neutral assessment that will be implemented or continue to be implemented after the completion of the relevant development will be completed within agreed timescales. A report demonstrating that all such measures have been installed will be provided to the satisfaction of and approved in writing by the Local Planning Authority upon completed of the development.

Reason: To protect local air quality, in accordance with Policy 7.14 of the London Plan (2016), and protect air quality and people's health by ensuring that the production of air pollutants, such as nitrogen dioxide and particulate matter, are kept to a minimum during the lifetime of the development. To contribute towards the maintenance or to prevent further exceedances of National Air Quality Objectives.

22 Details of the extract ventilation system and odour control equipment for any commercial kitchens, including all details of external ducting, shall be submitted to and approved in writing by the Local Planning Authority prior to the installation of any such equipment. The approved equipment shall be installed prior to the commencement of the relevant use and shall thereafter be operated at all times during the operating hours of the relevant use and maintained in accordance with the manufacturer's instructions.

Reason: To protect the amenity of existing and future residential occupiers.

23 Development for each phase, excluding site preparation works, and Phase 1, shall not commence until a drainage strategy for each phase detailing any on and/or off site drainage works, has been submitted in writing to and approved in writing by the Local Planning Authority in consultation with the sewerage undertaker unless otherwise agreed in writing with the Local Planning Authority. No discharge of foul or surface water from the relevant phase shall be accepted into the public system or River Brent until the drainage works referred to in the strategy have been completed.

Reason - The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community.

24 Prior to the commencement of development in each relevant phase, excluding site preparation works, and Phase 1, impact studies of the existing water supply infrastructure shall be submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water for that phase unless otherwise agreed in writing with the Local Planning Authority. The studies shall determine the magnitude of any new additional capacity required in the system and a suitable connection point. Development of the relevant phase shall not be commenced until the studies have been approved in writing by the Local Planning Authority. The development for that particular phase shall not be brought into use until any necessary mitigation measures identified by the impact studies have been approved in writing by the Local Planning Authority and carried out in full in accordance with the approved details.

Reason: To ensure that the water supply infrastructure has sufficient capacity to cope with the additional demand in accordance with London Plan (2016) policies 5.14 'Water Quality and Wastewater Infrastructure' and 5.15 'Water Use and Supplies'.

25 Prior to the commencement of a relevant phase of development, a Construction Method Statement (CMS) shall be submitted to and agreed by the Local Planning Authority for that phase which will outline the different activities and procedures to be undertaken in order to complete the various construction works within the relevant phase unless otherwise agreed in writing by the Local Planning Authority. The CMS shall include the following items:

- The detailed construction programme for works, highlighting the various stages and their context within the project, including a full schedule of plant, vehicles and equipment schedules;
- Site layout arrangements (including requirements for temporary works), plans for storage, accommodation, vehicular parking areas, wheel washing facilities, delivery and site access and egress;
- Details of operations that are likely to result in disturbance, in particular dust and noise, with an indication of the expected duration of operations with key dates, including a procedure for prior notification of LBB and relevant statutory and non-statutory parties so that local arrangements can be agreed; and,
- Consultation on the enabling works, demolition and construction methods and plant type to be used for work near to the Thames Water sewer networks.

Reason: The CMS will be used to inform the phase specific Construction Environmental Management Plan and ensure that mitigation measures outline within the January 2018 ES are sufficient for the specific works to be undertaken by the contractor within each phase of the development.

26 No phase of the development hereby approved shall commence until a phase specific Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority for the relevant phase. The CEMP shall provide details of how interim and construction works, based on the CMS for that phase, are to be undertaken and will include the following unless otherwise agreed in writing by the Local Planning Authority:

a) Details of the controls with regard to general site layout and operations, working hours, site lighting, security, community engagement arrangements, emergency planning and response, fire prevention and control, utility works, and worker access and welfare; and,
b) Specific management measures and mitigation on matters such as noise and air quality management (including Air Quality Dust Management Plan), pollution incident response, lighting management, traffic management, water management, ecology, trees and landscape management and heritage management, as required.

The development shall be carried out in accordance with the approved details and mitigation measures. Additionally the site Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out on the site. All sub-contractors shall be required to demonstrate adherence to policies and procedures set out within the CEMP.

Reason: To safeguard the amenity of the neighbours by minimising impacts of the development that would otherwise give rise to nuisance and in the interest of highway and pedestrian flow and safety.

27 Details of a scheme setting out the collection and storage of waste and recycled materials for a relevant building shall be submitted in writing to and for approval by the Local Planning Authority prior to the commencement any superstructure works excluding site preparation works, for that building, unless otherwise agreed in writing by the Local Planning Authority.

The scheme shall address:

1) Waste and recycling collection frequency, following liaison with Brent's Waste Management Team
2) The collection storage areas
3) Temporary waste facilities

The details shall be implemented as approved prior to the occupation of the development for residential purposes, and maintained thereafter.
Reason: to protect the amenity of the locality.

28 Prior to the commencement of works within a relevant phase of development, a Construction Logistics Plan (CLP), which has been based on the Framework Construction Method Statement and Logistics Plan, shall be submitted to and approved in writing by the Local Planning Authority for that phase. The approved CLP shall be implemented for the duration of interim works and construction of that phase unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interest of highway and pedestrian flow and safety.

29 No piling for a relevant phase of development shall take place until a Piling Method Statement (which details the proposed programme, depth and type of piling works; construction methodology and measures to prevent/minimise the potential for damage to subsurface sewerage infrastructure, and the Grand Union Canal where appropriate) has been submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water (and the Canal and Rivers Trust where appropriate) for that phase unless otherwise agreed in writing by the Local Planning Authority. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

30 Prior to the commencement of works within a relevant phase of development, excluding site preparation works and Phase 1, an Ecological Mitigation and Enhancement Plan (EMEP) shall be submitted to and approved in writing by the Local Planning Authority for that phase. The EMEP shall be implemented and complied with, unless otherwise approved in writing by the Local Planning Authority.

Reason: In order to ensure that the authorised development makes a positive contribution to biodiversity in accordance with Policies 7.18 and 7.19 of the London Plan (2016).

31 A management plan, detailing the maintenance and cleaning regime for the public and communal external spaces within each relevant phase of development, shall be

submitted to and approved in writing by the Local Planning Authority in writing prior to first use of the public or communal spaces within that phase of development. The approved plan shall be updated where required and implemented for the life of this development unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure a good quality of environment is provided.

32 Applications for the approval of Reserved Matters for a relevant phase of the development that include residential floorspace (within Use Class C3) shall be accompanied by details of the provision of play and recreational space and any associated equipment within the communal parts the relevant part of the development and shall adhere to the Mayor's 'Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance' (2012) unless otherwise agreed in writing with the Local Planning Authority. The approved play and recreational space and any associated equipment situated within the relevant part of the development site shall be implemented prior to first occupation of the relevant part of the development. The playspace shall thereafter be retained and maintained in accordance with the manufacturers specifications.

The details submitted to the Local Planning Authority must also include an update detailing the overall provision of play space and recreational facilities across the application site.

Reason: To ensure that a good quality of accommodation is provided for future residents.

33 Prior to first occupation of a relevant phase of development, a Delivery and Servicing Plan (DSP) based on the framework DSP shall be submitted to and approved in writing by the Local Planning Authority for that phase and the approved DSP shall be implemented for the life of the development unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interest of highway and pedestrian flow and safety.

34 Details of the wind mitigation measures, including any screening or other measures around balconies or communal amenity areas and how the design of blocks respond to micro-climate issues shall be submitted to and approved in writing by the Local Planning Authority with the submission of each reserved matters application unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure the outdoor amenity areas hereby approved are usable.

35 'The Generator' building approved in Plot N (Phase 3) shall be subdivided into individual units of no more than 2,800sqm (GIA) of B1(c)/B8 floorspace unless otherwise agreed in writing by the Local Planning Authority.

Reason: In order to provide for a range of unit sizes to offer flexibility to a range of different future occupiers.

36 The application(s) for the approval of Reserved Matters in relation to Plot N shall demonstrate how the building within this plot will be internally and externally laid out to attract a range of operators and offer an attractive and flexible working environment, including the provision of communal facilities to facilitate interaction between future occupiers of the building.

Reason: In the interests of providing suitable employment generating floorspace in line with the Employment Strategy hereby approved.

37 Prior to commencement of development of the relevant phase/building (as applicable) (except for demolition and site clearance) hereby approved, a BREEAM pre-assessment relating to all non-residential floor space within the development, which targets a rating of 'excellent', or an alternative rating to be agreed in writing by the Local Planning Authority, shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the Development is designed and constructed to improve environmental performance and adapt to the effects of climate change over time.

38 Within 6 months of commercial floorspace within each building (as applicable), a Post Construction Stage Review BRE Certificate shall be submitted to and approved in writing by the Local Planning Authority. The certificate shall demonstrate that the commercial floor space within the development has achieved BREEAM "Excellent" unless otherwise agreed in writing by the Local Planning Authority. The Development shall be maintained so that it continues to comply for the lifetime of the Development.

Reason: To ensure the Development is designed and constructed to improve environmental performance and adapt to the effects of climate change over time.

39 All relevant Phases/Buildings (as applicable) shall comply with Brent's Waste Planning Guidance (or any such document which may replace this guidance) unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure adequate storage for household and commercial waste is available to occupiers of the development.

40 The residential units hereby approved shall at no time be converted from C3 residential to a C4 small HMO, notwithstanding the provisions of Schedule 2 Part 3 Class L of the Town and Country Planning (General Permitted Development) Order 2015 (or any order revoking and re-enacting that Order) without express planning permission having first been granted by the Local Planning Authority.

Reason: To ensure that an adequate standard of accommodation is maintained in all of the residential units.

INFORMATIVES

1 In dealing with this application, the London Borough of Brent has implemented the requirements of the National Planning Policy Framework and of the Town and Country Planning (Development Management Procedure) (England) Order 2015 to foster the delivery of sustainable development in a positive and proactive manner.

2 The Community Infrastructure Levy will be collected by Brent after/should the scheme is/be implemented and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation in line with the construction costs index.

3 The applicant is advised that under the Control of Pollution Act 1974, construction work which will be audible at the site boundary will be restricted to the following

hours:
- 8.00am - 6.00pm Monday to Friday
- 8.00am - 1.00pm Saturday
- and not at all on Sundays and Bank Holidays.

4 The applicant's attention is drawn to the Party Wall Act 1996 which sets out requirements for notice to be given to relevant adjoining owners of intended works on a shared wall, on a boundary or if excavations are to be carried out near a neighbouring building.

5 A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed online via www.thameswater.co.uk/wastewaterquality."
Attenuation of Storm Flows. Combined Sewer drain to nearest manhole.

6 In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. The contact number is 0800 009 3921.

7 There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted for extensions to existing buildings. The applicant is advised to visit thameswater.co.uk/buildover. Water Main Crossing Diversion (Thames Water)

8 There is a Thames Water main crossing the development site which may/will need to be diverted at the Developer's cost, or necessitate amendments to the proposed development design so that the aforementioned main can be retained. Unrestricted access must be available at all times for maintenance and repair. Please contact Thames Water Developer Services, Contact Centre on Telephone No: 0800 009 3921 for further information.

9 Thames Water will aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

10 Commercial Business must ensure all waste produced on site are disposed of responsibly under their duty of care within Environmental Protection Act 1990. It is for the business to arrange a properly documented process for waste collection from a licensed contractor of their choice. Documentation must be kept by the business and be produced on request of an authorised Local Planning Authority Official under

section 34 of the Act. Failure to do so may result in a fixed penalty fine or prosecution through the criminal Court system.

11 The applicant is advised that prior to demolition of existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.

12 The new development will require naming. The applicant should contact LBB Local Land Charges at least six weeks before the development is occupied on 020 8489 5573 to arrange for the allocation of a suitable address. Environment Agency – Additional Advice (Environment Agency)

13 The Environment Agency has provided advice to the applicant in respect of Ground Water Protection and Land Affected by Contamination. This advice is available on the Local Planning Authority's website using the application reference number.

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

15 This is a phased development for the purposes of the CIL Regulations (2010 as amended). The extent of the CIL phase will be defined on a relevant CIL phasing plan.

16 These comprise site preparation and temporary works including but not limited to the demolition of existing buildings and structures; surveys; site clearance; archaeological works; ground investigation; remediation; the erection of fencing or hoardings; the provision of security measures and lighting; the erection of temporary buildings or structures associated with the development; the laying, removal or diversion of services; construction of temporary access; temporary highway works; and temporary internal site roads.

17 The management and maintenance plan for the sustainable drainage scheme for the lifetime of the development will be a live document that will be updated as and when each phase of the development comes forward for development.

18 The necessary environmental permits and consents for works to the River Brent and Grand Union Canal are to be obtained, as required, from the Environmental Agency and the Canal and River & Trust and submitted to Local Planning Authority.

19 It is likely that during the course of ground works that you will encounter invasive species of flora such as Japanese Knotweed, Giant Hogweed and Himalayan Balsam. Correct disposal of invasive non-native species biological material is vital in order to avoid the risk of spreading the species beyond the site/location. If in doubt, always contact the relevant agency for advice on disposal as there statutory regulations which must be adhered to which cover the composting, burning and buries of plant materials on-site and the transfer and disposal of material including ash to licensed or permitted landfill sites. Large volumes of waste requiring burial on site may require a licence under the Pollution Prevention and Control Regulations 2002.

20 Wycombe Road shall be stopped up as public highway under S247 of the Town & Country Planning Act 1990 prior to any building works commencing on the area of land currently occupied by the road.

21 **Definitions**

SubStructure:
Substructure works are defined as building foundations or underlying building supporting substructure

Superstructure:
Superstructure works are defined as part of the building above its foundations

Phase:
A phase of development comprises a phase defined for the purposes of CIL and/or a phase defined for the purposes of an application for reserved matters and/or a phase defined for the purposes of the discharge of planning conditions and/or a construction phase or sub-phase. A phase can comprise site preparation works, demolition works, sub-structures, and/or buildings, plots or groups of plots.

Interim Works:
Interim works comprise temporary works and uses associated with the development necessary to complete the development which may arise during the construction period.

Any person wishing to inspect the above papers should contact Colin Leadbeatter, Planning and Regeneration, Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ, Tel. No. 020 8937 2232