

COMMITTEE REPORT

Planning Committee on
Item No
Case Number

9 September, 2020
03
20/0587

SITE INFORMATION

RECEIVED	17 February, 2020
WARD	Tokyngton
PLANNING AREA	
LOCATION	1,2,3 & 9 Watkin Road, Wembley, HA9 0NL
PROPOSAL	Demolition of existing buildings and erection of 1x part-20, part-17 storey building and 1x 14 storey building together containing 174 residential units; commercial floor space (B1a and B1c use class) on ground, first and second floors; car and cycle parking, refuse storage, amenity space and associated landscaping.
PLAN NO'S	Refer to condition 2.
LINK TO DOCUMENTS ASSOCIATED WITH THIS PLANNING APPLICATION	<p><u>When viewing this on an Electronic Device</u></p> <p>Please click on the link below to view ALL document associated to case https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=DCAPR_149025</p> <p><u>When viewing this as an Hard Copy</u> _</p> <p>Please use the following steps</p> <ol style="list-style-type: none">1. Please go to pa.brent.gov.uk2. Select Planning and conduct a search tying "20/0587" (i.e. Case Reference) into the search Box3. Click on "View Documents" tab

RECOMMENDATIONS

That the Committee resolve to GRANT planning permission subject to:

Referral to the Mayor of London (stage 2 referral)

The prior completion of a legal agreement to secure the following planning obligations:

- Payment of legal, planning negotiation and planning monitoring costs associated with preparing and monitoring the Section 106 agreement
- Notification of commencement 28 days prior to material start
- Provision of 50 affordable housing units on a nil grant basis, comprised of:
 - i. 15 units for affordable rent (at London Affordable Rent levels, in accordance with the Mayor of London's Affordable Housing Programme 2016-2021 Funding Guidance (dated November 2016) and subject to an appropriate Affordable Rent nominations agreement with the Council, securing 100% nomination rights on first lets and 75% nomination rights on subsequent lets for the Council)
 - ii. 35 units for Shared Ownership,(as defined under section 70(6) of the Housing & Regeneration Act 2008, subject to London Plan policy affordability stipulations that total housing costs should not exceed 40% of net annual household income, disposed on a freehold / minimum 125 year leasehold to a Registered Provider, and subject to an appropriate Shared Ownership nominations agreement with the Council, that secures reasonable local priority to the units).
- In the event that the development does not commence within 24 months, an appropriate early stage review mechanism to secure additional on-site affordable housing, or an on-site provision of affordable housing that complies more closely with Brent's policy target affordable housing tenure split, as demonstrated achievable through financial viability assessments.
- An appropriate late stage review mechanism against the agreed base appraisal, assessing actual residential sales values, and securing any additional deferred affordable housing obligations as per an agreed formula to capture uplift in value (as demonstrated through financial viability assessments) within a commuted sum to be paid to the Council towards the provision and enablement of off-site affordable housing.
- The delivery of 940sqm of affordable workspace, including the provision of a goods lift, to be disposed of for no more than 50% of OMR/OMV for a minimum term of 15 years, remain affordable for the lifetime of the development and be leased to an affordable workspace provider approved by the Council, with the following restrictions:
 - a) To not occupy more than 75% of the private residential units until the affordable workspace has been leased to an affordable workspace provider, unless agreed in writing by the Council.
 - b) In the event that an affordable workspace provider cannot be secured following 2 years of marketing, pay a commuted sum commensurate with the value of the affordable workspace (as demonstrated through FVA) and for the units to revert to a non-affordable workspace use. Alternatively, the Council to be able to acquire the affordable workspace from the developer on a leasehold basis.
 - c) Not later than 3 months prior to the anticipated date of practical completion of the entire development, procure that the affordable workspace provider submits an

affordable workspace management plan for the Council's approval. Following this, to not occupy more than 75% of the private residential units until the affordable workspace management plan has been approved in writing by the Local Planning Authority and thereafter implemented. This requirement to fall away in that event that the above obligation is triggered.

d) Rent reviews to be undertaken every 10 years and submitted to the Council.

e) The workspace to be delivered by the developer to the following specification:

- to be finished to a standard that will allow for immediate occupation including secure entrance(s), heating, lighting, kitchenette(s) and wc facilities
- to be fully enclosed with perimeter walls and consented windows and doors installed and secure
- the floors to be power loaded with a minimum 3.5 Kn loading capacity (2.5 + 1 Kn) but must be able to accommodate Use Class B1(a) and B1(c)
- to be ventilated as per Planning Permission requirements and reasonable requirements by the Affordable Workspace Operator
- all statutory services are to be supplied, capped, tested and separately metered. All drainage to be installed and connected
- to comply with all relevant accessibility regulations and requirements
- electrical to be supplied
- For the affordable workspaces to be accessible on a 24/7 basis
 - Submission and approval and implementation of Training and Employment plan targeting Brent residents.
 - S38/S278 highway works under the Highways act 1980 to provide (i) a step free pedestrian crossing across Watkin Road with dropped kerbs and tactile paving, (ii) construction of loading and disabled bays in the footways of Watkin Road and the reinstatement of all redundant vehicle crossovers to footway and (iii) the Council's adoption of land along the site frontage in order to maintain an unobstructed footway width of 2m along the site frontages.
 - Parking permit restriction to be applied to all new residential units
 - Enhanced travel plan to be submitted, implemented and monitored including funding of subsidised membership of the Car Club for three years for all new residents.
 - Financial contribution towards the development and the implementation of a zebra crossing with raised table set back about 10 metres from the give way line at the junction of Fulton Road and Albion Way (£10,000).
 - Financial contribution towards the expansion of the local Controlled Parking Zone (£87,000)

- Financial contribution towards improving local bus capacity, paid to TfL (£175,667)
- Carbon offset contribution to be paid – or an opportunity to resubmit an improved energy statement and reduce the offset payment.
- Financial contribution towards the supply, installation and maintenance of knockabout goal posts for informal play within Chalk Hill Open Space / St David's Open Space (£5,000)
- Detailed submission of Television and Radio Reception Impact and underwriting of all mitigation required in addressing any interference
- Indexation of contributions in line with inflation
- Any other planning obligation(s) considered necessary by the Head of Planning.

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

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

Compliance

1. 3 years consent
2. Approved plans
3. Number of residential units
4. Quantum and use of commercial space
5. East facing windows close to boundaries with no's 4 and 8 Watkin Road to be obscure glazed
6. Provision of disabled adaptable units
7. Provision of refuse storage
8. Provision of blue badge car parking
9. Water consumption limitation
10. Provision of communal aerial and satellite dish system for each building
11. Revoke C4 permitted development rights
12. Non-road mobile machinery power restriction
13. All substation doors to open inwards unless details are submitted and approved robustly explaining why they need to open outwards
14. Flood/drainage/SuDS details to be secured or further submissions made if necessary
15. Air Quality report recommendations to be secured or further submissions made if necessary
16. Biodiversity/Ecology mitigation and enhancement measures to be secured
17. Tree protection plan to be secured

Pre-commencement

18. Submit Construction Logistics Plan
19. Submit Construction Environmental Management Plan
20. Submit Construction Ecology Management Plan
21. Submit Invasive Species Method Statement
22. Submit details of fire resistant materials in satisfying draft LP policy D12, if not addressed at GLA Stage II referral, and secure fire safety strategy.

Post-commencement

23. Submit Land Contamination study
24. Submit External material samples
25. Submit details of Electric Vehicle Charging points
26. Submit details of a connection point to district heat network in case future connection can be made

Pre-occupation

27. Submit details of privacy screening to easternmost balconies close to boundary
28. Submit landscaping plans incorporating play spaces, plant species, tree species, coordination with neighbouring site, microclimate measures, biodiversity enhancement measures, external lighting with luminance levels specified
29. Revise cycle parking in southern block, C3, B1c and B1a and provide cycle parking
30. Submit delivery and servicing plan
31. Evidence of noise report recommendations to be submitted
32. Submit plant noise testing if necessary

Informatives

1. CIL liability
2. Party wall information
3. Building near boundary information
4. London Living Wage note
5. Fire safety advisory note
6. Any other informative(s) considered necessary by the Head of Planning

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 nor that such change(s) could reasonably have led to a different decision having been reached by the committee.

That, if by the "expiry date" of this application (subject to any amendments/extensions to the expiry date agreed by both parties) the legal agreement has not been completed, the Head of Planning is delegated authority to refuse planning permission.

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

SITE MAP

	Planning Committee Map Site address: 1,2,3 & 9 Watkin Road, Wembley, HA9 0NL © Crown copyright and database rights 2011 Ordnance Survey 100025260
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This map is indicative only.



PROPOSAL IN DETAIL

Each of the land plots forming the development site is to accommodate a new residential block.

The southern site would contain a building that, in part, extends to 20 storeys in height and in part extends to 17 storeys in height, whilst the northern site would contain a building that extends to 14 storeys in height.

The southern site is proposed to deliver 994sqm of affordable workspace within the ground to 2nd floors and 124 open market residential dwellings across the 3rd to 19th floors.

The northern site is proposed to deliver 50 affordable residential dwellings.

EXISTING

The development site for this proposal is split into two. The southern site forms units 1, 2 and 3 on the south western side of Watkin Road and fronts onto Watkin Road to the north east and north west, Fulton Road to the south west and unit 4 of Watkin Road to the south east. This southern site is therefore located on a prominent corner along Fulton Road, one of the main thoroughfares through the Wembley Park area.

The northern site forms unit 9 of Watkin Road on the north eastern side of the road. The site borders Watkin Road to the south-west, the under construction development of 10-11 Watkin Road to the north-west, the Wealdstone Brook to the north-east and unit 8 of Watkin Road to the south-east.

The application site is located within the Wembley Growth Area and forms part of site allocation W26: Watkin Road (Site allocation BC6A6: Watkin Road in the emerging Local Plan). The northern part of the site closest to the Wealdstone Brook lies within Flood Zone 3a as identified by the Environment Agency, and parts of the site are also within land that is liable to surface water flooding.

AMENDMENTS SINCE SUBMISSION

- Application Boundary – Adjusted to reduced extent of Fulton Road within site area.
- Additional Windows – South Block, 18th and 19th floors on east elevation (1b2p units) to create 4 additional dual-aspect units.
- Additional Windows – South Block, 3rd to 16th floors to north-facing 1b1p units to create 14 additional dual-aspect units.
- Long-term Cycle Spaces – Spacing increased to 450mm for all spaces in North Block and c. 35% in South Block, with the remaining at 400mm.
- Pedestrian Crossing – Re-included on Watkin Road.
- Entrance Ramp – South Block ramp re-orientated to primarily address Watkin Road.
- Wheelchair Accessible Parking Spaces – Relocated to be closer to the residential entrances, swapped with the Service Bay.
- Platform Lift – Included for South Block to satisfy travel distance concerns.
- Short Term Cycle Spaces – Relocated to reduce impact on public realm.
- Lift Sizes – North and South Blocks, internal lift dimensions shown for bicycle lifts to and from cycle stores on 1st Floor.
- Urban Greening – Adjustments to landscape proposal (roof terraces and ground floor public realm) to ensure compliance with 0.4 Urban Greening Factor (UGF) requirement.
- Public Realm – Outward opening external doors at ground floor amended to be inward opening (except substations where UKPN requirements are for externally opening doors only).

- B1c Layout – Ground floor adjustments to facilitate a loading area, platform lift, bin storage area, etc.

B1c Lift – Lift opening rotated to facilitate a wider opening width and increased manoeuvrability for loading.

SUMMARY OF KEY ISSUES

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

1. **Representations received:** 1,078 neighbouring properties were notified of the development, in addition to site notices and press notices being published. 1 neutral comment and 5 objections were received. Objections raised concerns over disruption from construction works, increase in footfall and road use, the piecemeal approach to the development, excessive height and overdevelopment. Your officers have addressed the objections raised and consider that the development proposal is acceptable.
2. **Provision of new homes and affordable workspace:** Your officers give great weight to the viable delivery of private and affordable housing and new affordable commercial floor space, in line with the adopted Development Plan.
3. **The impact of a building of this height and design in this location:** The proposal replaces a poor quality commercial plot with a large modern high density development in keeping with the surrounding and approved built form. The development utilises good architecture with quality detailing and materials in order to maximise the site's potential whilst respecting surrounding development. Whilst the development would slightly reduce the extent of the Wembley Stadium arch that would be visible from Chalkhill Park and incur some level of harm to the daylight and sunlight enjoyed at neighbouring properties, a balance has to be struck between different planning objectives, and the benefits of the proposal are considered to significantly outweigh its harm. The height, layout, design and massing has been carefully considered and has been evaluated by the GLA and by Brent Officers who all have concluded that the proposed building is appropriate for this context.
4. **Quality of the resulting residential accommodation:** The residential accommodation proposed is of sufficiently high quality. The mix of units is in accordance with the standards within the London Plan and reasonably well aligned with the Wembley Area Action Plan mix, and the flats would generally have good outlook and light. The amenity space is below our standard, but is still substantial and is high for a tall building. The applicant is to offset shortfalls in child play space provision through a financial contribution to deliver older child play space at a nearby park.
5. **Affordable housing and mix of units:** The maximum reasonable amount has been provided on a near policy compliant tenure split. This includes 35% affordable housing provision, measured by habitable room, with a tenure split of 30:70 between London Affordable Rented and Shared Ownership flats. Half of the affordable homes are 3 bedroom flats. The viability has been tested and it has been demonstrated that this is the maximum reasonable amount that can be provided on site. The requirements of affordable housing obligations are considered to have been met and an early and late stage viability review will be secured by S106.
6. **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. The impact is considered to be acceptable given the urban context of the site. The overall impact of the development is considered acceptable, particularly in view of the wider regenerative benefits.
7. **Highways and transportation:** The alterations to the public highway as required in the S106 would be acceptable, considering the needs of pedestrians, cyclists and motorists. The highway works will include (i) construction of a step free pedestrian crossing across Watkin Road with dropped kerbs and tactile paving, (ii) construction of loading and disabled bays in the footways of Watkin Road and the reinstatement of all redundant vehicle crossovers to footway and (iii) the Council's adoption of land along

the site frontage in order to maintain an unobstructed footway width of 2m along the site frontages. A financial contribution of £10,000 will be secured to enable the Council to implement a zebra crossing with a raised table at the junction of Fulton Road and Albion Way to improve pedestrian access to the site. To encourage sustainable travel patterns, the scheme will be 'car-free' with the exception of blue badge parking spaces. A financial contribution of £87,000 towards extending CPZ's into the area is proposed with the removal of rights for residents within the development to apply for parking permits. A financial contribution (£175,667) for bus service enhancements in the area, as required by TfL, will also be secured.

8. **Trees, landscaping and public realm:** The development will not include the loss of any trees but will include an uplift in trees on site as part of public realm improvements. The proposal will provide a good level of urban greening compared to the existing situation through a high-quality landscaping plan. Suitable ecological safeguards have been proposed, particularly in relation to the adjacent site in nature conservation, and are considered acceptable. These measures will be secured through conditions.
9. **Environmental impact, sustainability and energy:** The measures outlined by the applicant achieve the required improvement on carbon savings within London Plan policy. A carbon offsetting contribution will be secured to further mitigate environmental impact.
10. **Flooding and Drainage:** Part of the site sits within a flood zone and flood resilient design has been accordingly incorporated within the development. A flood mitigation strategy and drainage strategy will be secured by condition to mitigate the risks associated with this. The development will also substantially improve the drainage capacity of the site through attenuation measures.

RELEVANT SITE HISTORY

No relevant planning history.

CONSULTATIONS

Public consultation

This application was advertised in the local press in early 2020 and again on 06/08/2020, following the publication of the submitted daylight and sunlight on the Council's website. A further advertisement of the application in the local press was made on 13/08/2020 following a minor reduction in the red line application area being made.

A site notice advertising this application was erected outside the application site on 19/03/2020 and then again on 04/08/2020. A further site notice was erected on 11/08/2020.

1,078 nearby properties were notified of this proposal by letter on 24/02/2020 and then again on 04/08/2020.

5 neighbouring properties objected to the application and 1 neighbouring properties submitted a neutral comment on the application.

The objections raised are addressed below:

Ground of objection	Officer response
Existing construction at units 10 and 11 Watkin Road can cause highway disruption that results in aborted deliveries to businesses in operation along Watkin Road. This proposal could worsen ongoing construction management and logistics issues.	This is addressed in paragraph 145-147 .
There is no space for supply vehicles to park nor a tower crane to be erected were the construction of this proposal to proceed.	This is addressed in paragraph 141 and 145-147 .
Watkin Road should be comprehensively developed	All development proposals must

rather than developed on a piecemeal basis to both enable combined landscaping, car parking and bicycle parking and to minimise road disruption during construction.	be considered on the basis of their own merits.
New buildings in this area are associated with parking problems and a number of lorries are having to deliver to multiple construction sites. This often results in closed / blocked streets to the inconvenience of residents at Empire Court and businesses along Watkin Road.	This is addressed in paragraph 145-147 .
The proposed development exceeds the capacity of the site.	The development is considered to be of suitable density and would provide a good quality of accommodation and impact on neighbouring properties that would not be unreasonably compromised by the constraints of the site.
The footfall generated by this development will not be safe in the context of the continuing operation of businesses along Watkin Road, which is a cul-de-sac.	The estimated trip rates / footfall of the development have been considered by Brent highways and Transport for London and neither have raised concerns from this perspective. It is likely that footfall to/from the building would be almost solely to/from the Fulton Road junction rather than farther east along Watkin Road.
The demand for large vehicles to enter and exit the Watkin Road cul-de-sac would be high.	This is addressed in paragraph 145-147 .
The footpath to Watkin Road must be maintained as it is vital to the businesses along the road.	This is addressed in paragraph 145-147 . Following the construction phase, the footpath along Watkin Road would continue to be maintained as an adopted highway as is the case at present. Footpath access during the construction phase would be subject to construction logistics arrangements that seek to minimise impact on surrounding occupiers, as agreed with Brent's highways officers. The construction logistics arrangements would need to be submitted to the Local Planning Authority for approval and would be a matter of public record.
The servicing bay on the plans is partly over the footpath which is unacceptable.	This is addressed in paragraph 140 .
The height of the buildings is out of scale with the surroundings as it stands.	This is addressed in paragraphs 43-49 .

The neutral comments made are addressed below:

Comment	Officer response
<p>Development that contributes to the regeneration of Watkin Road, which makes efficient use of the land available to deliver a mix of uses in line with the development policies set out in the adopted and emerging Development Plans is supported.</p>	<p>Noted.</p>
<p>It is considered that the applicant’s proposal fulfils the objectives of delivering a mix of uses as set out in policy, including employment opportunities and residential uses.</p>	<p>Noted.</p>
<p>We encourage new development that celebrates and enables views to the stadium however we query whether the proposed development achieves this, as part of the development appears to sit in an area which is affected by the protected view designation from Chalkhill Park.</p> <p>We are interested to understand the Council’s position on this.</p>	<p>This is addressed in paragraph 49.</p>
<p>We support development that maximises the efficiency of developable land and delivers uses in line with adopted and emerging policy. It is important, however, that the approval of development proposals does not prejudice the comprehensive development of the adopted allocated under Policy W26, which states that “proposed development must ensure it does not adversely affect the ability of other plots within the allocation to maximise their own development potential”.</p> <p>The proposal includes obscure glass panel windows on its eastern elevation which overlooks 7-8 Watkin Road. Given the potential for limited separation distances between the applicant’s proposal and proposals to the east, this arrangement is welcomed.</p> <p>The proposals include balconies on the northern and southern elevation which have both north/south and east aspect towards 7-8 Watkin Road. The balconies should be configured or have measures in place so as to ensure that adequate privacy can be maintained against any future neighbouring development. It is vital that potential future development sites are not prejudiced.</p>	<p>This is addressed in paragraph 68.</p>

External statutory and professional body consultation

The Greater London Authority (GLA) – The GLA supported the proposal in principle but raised the following strategic concerns:

GLA Comment	Officer response

<p>Residential-led mixed-use development in the Wembley Opportunity Area is supported.</p> <p>Details should be provided regarding the quantum of affordable workspace, its layout and servicing ability, its affordability and management arrangements.</p>	<p>This has been confirmed and is discussed below in paragraphs 4-6.</p> <p>A management plan for the affordable workspace is to be secured as part of the Section 106 Schedule for the affordable workspace.</p>
<p>The application proposes 35% affordable housing by habitable room, including at least 30% at London Affordable Rents and at least 30% as Intermediate products, thereby meeting relevant emerging London Plan policy. The proposal also now re-provides the industrial capacity in line with policy although appropriate conditions should be secured for the specification, use and fit out.</p>	<p>The specification and fit out is to be secured within the S106 whilst the use is to be secured through condition.</p> <p>The affordable workspace provision is discussed more generally at paragraphs 4-6.</p>
<p>The site layout could be improved with greater activation along Watkin Road. Single aspect north facing units need to be reduced to improve residential quality, especially within the southern block. The Council should consider a financial contribution toward enhancements for local play facilities.</p>	<p>The applicant has reduced the number of single aspect units since submission and has incorporated additional windows as follows:</p> <ul style="list-style-type: none"> • South Block, 18th and 19th floors on east elevation (1b2p units) to create 4 additional dual-aspect units. • South Block, 3rd to 16th floors to north-facing 1b1p units to create 14 additional dual-aspect units. <p>Single aspect is discussed within paragraphs 92-95.</p> <p>The play space contribution is discussed at paragraph 112.</p>
<p>Further information regarding energy and drainage is required.</p>	<p>This is discussed within paragraphs 160 and 181.</p>

A number of other more specific matters were raised by the GLA, relating to transport, fire safety, energy and sustainability and flooding and drainage. These specific comments will be identified and addressed at the corresponding sections within the body of the report below.

Transport for London (TfL) – Clarifications and amendments requested prior to supporting the proposal. These matters have now been fully address and are discussed in the transport section within the main body of the report.

The Environment Agency – No objections subject to conditions and informatives.

Thames Water – No objections

Quintain Estates and Development PLC – Objected to the proposal on the following grounds:

Grounds of objection	Officer response
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The applicant's location plan includes an area of third party ownership for which they have not served notice of the application being made.	The applicant has now served the requisite notice on Quintain.
Paragraph 7.62 of the applicant's daylight and sunlight report states that the lower windows in NE05 in the 'existing' context achieve VSC levels of circa 15%-30%. At paragraph 7.63 the report states that with the proposed development in place the levels of VSC on the lower levels directly opposite the site would reduce to 12%-20%. However, the 3d model images within the report appear to show the impact of the development on the façade of NE05 to be greater than this with much of the lower levels appearing to receive only between 5-10% VSC. We would therefore request that the applicant provides additional information, such as spot analysis of the worst impacted areas of the façade, to confirm that the VSC is no lower than 12% as suggested in the report. We would also ask for the applicant to confirm what assumptions have been made in the report with regard to window sizes and balconies in Plot NE05.	Since submission a supplementary daylight and sunlight analysis has been carried out to address this specific concern. The discussion of this is at paragraph 86 below.

Community Involvement

The applicants have submitted a statement of community involvement which sets out the key activities undertaken prior to submission to engage with stakeholders. The main stakeholder engagement activities can be summarised as follows:

A public exhibition was held over two days at Wembley International Hotel on Tuesday 26th November 2019 from 10am to 3pm and on Wednesday 27th November 2019 from 3pm to 8pm.

Over the two days 11 individuals attended the exhibition, including the Leader of the Danes & Empire Courts Residents' Association.

Three feedback forms have been returned with largely positive feedback.

The proposed height was noted to have been deemed appropriate in the local context and there was strong support for the delivery of 35% affordable housing. However, some attendees voiced concern about another tall building in an area which already has a large number.

Some stakeholders noted that they wanted as many 3 bedroom units as possible and one stakeholder questioned whether the levels of demand for 1 and 2 bedroom units as opposed to 3 bedroom units will continue into the future.

The public realm and landscaping was strongly supported by stakeholders and an aspiration for the developers to work with Barratt London to coordinate the public realm across the adjoining development site at 10-11 Watkin Road was voiced. It was largely agreed that the existing site is underutilised at present. The potential to link the site with the brook side in the future was welcomed.

Stakeholders supported the re-provision of commercial space and expressed interest in the types of occupier the space is targeted at.

The Leader of Danes and Empire Courts RA emphasised the need for affordable housing in the area and suggested that parking spaces are provided to diffuse pressure on parking spaces nearby. The Leader of Danes and Empire Courts RA also welcomed the new landscaping and improved public realm proposals.

A concern was raised that the redevelopment of the industrial space was unnecessary and that the nature of the commercial space would change the industrial character of Watkin Road. One attendee also felt that an

uplift in commercial workspace would be unlikely to be beneficial to the local economy and would be unlikely to create more jobs.

One attendee was concerned that the development would lead to increased traffic congestion locally despite the car free nature of the development.

A newsletter informing residents of the proposals and inviting them to the exhibition was sent to 5,229 local residents and businesses.

A preview of the public exhibition was held with the Leader of the Council and the Lead Member for Regeneration, Property & Planning to brief them on the proposals between 9am and 10am on Tuesday 26th November 2019.

POLICY CONSIDERATIONS

For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the Development Plan in force for the area is the 2010 Brent Core Strategy, the 2016 Brent Development Management Policies DPD, the 2011 Site Specific Allocations Document and the 2016 London Plan (Consolidated with Alterations since 2011). Key relevant policies include:

The London Plan (2016)

- 2.13 – Opportunity areas and intensification areas
- 3.3 - Increasing Housing Supply
- 3.4 - Optimising housing potential
- 3.5 – Quality and Design of Housing Development
- 3.6 - Children and young person's play and informal recreation facilities
- 3.8 - Housing Choice
- 3.12 - Negotiating affordable housing on individual private residential and mixed use schemes -
- 5.2 - Minimising Carbon Dioxide emissions
- 5.12 - Flood Risk Management
- 5.13 - Sustainable Drainage
- 5.15 - Water Use and Supplies
- 6.3 - Assessing effects of development on transport capacity
- 6.9 - Cycling
- 7.2 - An inclusive environment
- 7.7 – Location and Design of Tall and Large Buildings

Brent Core Strategy (2010)

- CP1: Spatial Development Strategy
- CP2: Population and Housing Growth
- CP5: Placemaking
- CP6: Design & Density in Place Shaping
- CP7: Wembley Growth Area
- CP18: Protection and Enhancement of Open Space, Sports and Biodiversity
- CP19: Brent Strategic Climate Change Mitigation and Adaptation Measures
- CP21: A Balanced Housing Stock

Brent Development Management Policies (2016)

- DMP 1: Development Management General Policy
- DMP 9: Waterside Development
- DMP 9 A: Managing Flood Risk
- DMP 9 B: On Site Water Management and Surface Water Attenuation
- DMP 11: Forming an Access on to a Road
- DMP 13: Movement of Goods and Materials
- DMP 14: Employment
- DMP 15: Affordable Housing
- DMP 18: Dwelling Size and Residential Outbuildings
- DMP 19: Residential Amenity Space

Wembley Area Action Plan (2015)

- WEM 1 – Urban Form
- WEM 2 – Gateways to Wembley

WEM 3 – Public Realm
WEM 5 – Tall Buildings
WEM 6 – Protection of Stadium Views
WEM 8 – Securing Design Quality
WEM 10 – Low cost Business start-up Space
WEM 14 – Car Parking Strategy
WEM 15 – Car Parking Standards
WEM 16 – Walking and Cycling
WEM 18 – Housing Mix
WEM 19 – Family Housing
WEM 24 – New Retail Development
WEM 25 – Strategy Cultural Area
WEM 30 – Decentralised Energy
WEM 32 – Urban Greening
WEM 33 – Flood Risk
WEM 34 – Open Space Provision
WEM 35 – Open Space Improvements
WEM 38 – Play Provision
WEM 40 – River Brent and Wealdstone Brook
Site W 26 – Watkin Road

All of these documents are adopted and therefore carry significant weight in the assessment of any planning application.

In addition, the Examination in Public for the Draft New London Plan has been completed and the Panel Report has been received by the GLA. The GLA have now released a "Intend to publish" version dated December 2019. This carries substantial weight as an emerging document that will supersede the London Plan 2016 once adopted.

Relevant policies in the 'intend to publish' London Plan include:

D1 London's form, character and capacity for growth
D2 Infrastructure requirements for sustainable densities
D3 Optimising site capacity through the design-led approach
D4 Delivering good design
D5 Inclusive design
D6 Housing quality and standards
D7 Accessible housing
D8 Public realm
D9 Tall buildings
D10 Basement development
D11 Safety, security and resilience to emergency
D12 Fire safety
D14 Noise
H1 Increasing housing supply
H4 Delivering affordable housing
H5 Threshold approach to applications
H6 Affordable housing tenure
H7 Monitoring of affordable housing
H10 Housing size mix
S4 Play and informal recreation
E3 Affordable workspace
E11 Skills and opportunities for all
HC3 Strategic and Local Views
G1 Green infrastructure
G4 Open space
G5 Urban greening
G6 Biodiversity and access to nature
G7 Trees and woodlands
SI 1 Improving air quality
SI 2 Minimising greenhouse gas emissions
SI 3 Energy infrastructure
SI 4 Managing heat risk

SI 5 Water infrastructure
SI 6 Digital connectivity infrastructure
SI 12 Flood risk management
SI 13 Sustainable drainage
T1 Strategic approach to transport
T2 Healthy Streets
T3 Transport capacity, connectivity and safeguarding
T4 Assessing and mitigating transport impacts
T5 Cycling
T6 Car parking
T7 Deliveries, servicing and construction
T9 Funding transport infrastructure through planning

The council is currently reviewing its Local Plan. Formal consultation on the draft Brent Local Plan was carried out under Regulation 19 of the Town and Country Planning Act (Local Planning) (England) Regulations 2012 between 24 October and 5 December 2019. At its meeting on 19 February 2020 Full Council approved the draft Plan for submission to the Secretary of State for examination. Therefore, having regard to the tests set out in paragraph 48 of the NPPF it is considered by Officer's that greater weight can now be applied to policies contained within the draft Brent Local Plan. Relevant policies include:

General:

DMP1 – Development Management General Policy

Place:

BP1 – Central
BCGA1 – Wembley Growth Area
BCSA6 – Watkin Road

Design:

BD1 – Leading the way in good design
BD2 – Tall buildings in Brent
BD3 – Basement Development

Housing:

BH1 – Increasing Housing Supply
BH2 – Priority Areas for Additional Housing Provision within Brent
BH5 – Affordable Housing
BH6 – Housing Size Mix
BH13 – Residential Amenity Space

Economy and Town Centres:

BE1 – Economic Growth and Employment Opportunities for All
BE3 – Local Employment Sites and Work-Live

Heritage and Culture:

BHC1 – Brent's Heritage Assets
BHC2 – National Stadium Wembley

Green Infrastructure and Natural Environment:

BGI1 – Green and Blue Infrastructure in Brent
BGI2 – Trees and Woodland

Sustainable Infrastructure:

BSUI1 – Creating a Resilient and Efficient Brent
BSUI2 – Air Quality
BSUI3 – Managing Flood Risk

Transport:

BT1 – Sustainable Travel Choice

BT2 – Parking and Car Free Development

BT3 – Freight and Servicing, Provision and Protection of Freight Facilities

BT4 – Forming an Access on to a Road

The following are also relevant material considerations:

The National Planning Policy Framework (revised 2019)

Mayor of London's Affordable Housing and Viability SPG 2017

Mayor of London's Housing SPG 2016

SPD1 Brent Design Guide 2018

Basements SPD 2017

DETAILED CONSIDERATIONS

Principle of development

Land Use

1. Policy 3.3 of the London Plan and Policy GG2 of the draft London Plan both identify the optimisation of land, including the development of brownfield sites, as a key part of the strategy for delivering additional homes in London. This is supported within policy CP2 of Brent's Core Strategy 2010, which requires the provision of at least 22,000 additional homes to be delivered between 2007 and 2026. Furthermore, the current London Plan includes a minimum annual monitoring target for Brent at 1,525 additional homes per year between 2015 and 2025. This target is proposed to increase to 2,915 for the period 2019/20-2028/29 in Policy H1 of the draft London Plan recognising the increasing demand for delivery of new homes across London. However, the London Plan Examination in Public Panel Report Appendix: Panel Recommendations October 2019 has suggested this target be reduced to 2,325 dwellings per annum, on account of contributions from small sites being recommended for a decrease within the report. Emerging local plan policy BH1 reflects this target.
2. Within local policy, Brent Policy CP8 sets out a target of at least 11,500 new homes being delivered in the Wembley Growth Area between 2010 and 2026, however since the Core Strategy was adopted in 2010, this target has been significantly increased to more than 15,000 homes across the same growth area within the emerging Local Plan (policy BP1). Whilst the development meets the requirements of Core Strategy policy CP2 in principle, the need for housing has increased significantly since the adoption of this policy in 2010 and these increasing targets necessitate the need for a greater delivery of homes within Brent than is anticipated in adopted policy.
3. The site is part of a specifically allocated site by the Council for mixed used development in both the adopted 2015 Wembley Area Action Plan (Site W26, with an indicative capacity of 400 residential units) and site allocation BC5A6 in the emerging Local Plan (with an increased indicative capacity of 838 residential units). Brent's emerging site specific allocation suggests an appropriate focus for the site being on the delivery of homes and employment floor space. The site allocation brief states: *"Brent's London Plan 'provide capacity' status for industrial means that industrial floor space at least on the ground floor of 0.65 plot ratio or existing floor space whichever is the greater will now be sought as part of the redevelopment of the site. Development in proximity to the eastern part must adopt the 'agent of change principle', potentially through incorporation of more commercial uses to ensure the potential activities within the Wembley Business Centre is not compromised."*
4. The applicants are proposing a 998sqm (GIA) / 1,155sqm (GEA) provision of employment floor space within the B1a and B1c use class and will offer the entirety of the B1c space (comprising 940sqm or 94% of the employment floor space) as managed affordable workspace, where commercial rents would not exceed 50% of the market rent. The quantum of space meets the requirements of the emerging London Plan policy E4 as it includes a larger Gross External Area provision of industrial (B1c) floor space (1,086sqm) than 65% of the application site area (1,049sqm) and is in excess of the existing industrial GIA (gross internal area). Similarly, in line with the aspirations of Brent's adopted DMP14 and emerging

BE2 policies as well as the aspirations of the adopted and emerging site allocation protecting and promoting the intensification of employment floor space, the proposal would provide an uplift in industrial employment floor space (GIA) from 882sqm to 940sqm. If including the non-industrial employment floor space (B1a), the uplift would increase from 882sqm to 998sqm.

5. In line with comments raised by the GLA and Brent's affordable workspace officer, the layout of the affordable workspaces has been adjusted since submission to optimise loading areas, accessibility and bin storage areas as well as to provide a larger lift opening to enable increased manoeuvrability for loading. Brent's affordable workspace officer now confirms that the commercial units have been suitably optimised and has set out a series of obligations on the developer to secure the delivery of the workspace and to provide a good level of fit out that would minimise overheads for a prospective affordable workspace provider. The full series of obligations are set out in the heads of terms within the 'Recommendation' section of this report.
6. The delivery of the affordable workspace will be secured in the S106 agreement, which will also require the submission of an affordable workspace management plan at the appropriate point in the process.
7. The development proposed is in line with that anticipated in the emerging site allocation, proposing a net gain in employment floor space and 174 residential units across two separate buildings on either side of Watkin Road. The wider site allocation has seen two schemes which have consent and which are being implemented, these being Parkwood House (283 student accommodation bed spaces + affordable workspace, ref: 17/2782) and 10-11 Watkin Road (229 residential units + affordable workspace, ref: 18/3381 & 19/2750). Together these schemes are delivering 512 residential units and this scheme would increase the delivery of homes within the allocation to 686, about 80% of the emerging site allocation's indicative capacity. When these three sites are taken together in spatial terms, they occupy about 43% of the extent of the land area within the site allocation; if the remainder of the site allocation were to be developed at the same average level of density as that which has been approved / come forward, some 1,600 units could be expected to be delivered within the site allocation, in excess of the 838 unit indicative capacity. Nonetheless, it is noted that the sites which have come forward at this stage are those in the western half of the allocation and that the allocation brief expects a reduction in density to the east and a stronger focus on employment uses, helping to ensure that development across the site allocation appropriately transitions between the taller built form to the west and the lower-scale built form to the east. As such, development within the remaining parts of the site allocation would likely be less dense, meaning that the 1,000 unit indicative capacity would appear to be quite apposite in the context of what has already come forward.
8. In summary, the uses proposed on the site are as follows:
 - 174 residential units (C3 use class)
 - 940sqm of managed affordable workspace (B1c use class)
 - 58sqm of office space (B1a use class)
9. Overall, the development is supported in principle and is considered to be appropriately compliant with key strategic policies relating to housing and employment floor space provision, both adopted and emerging.

The appropriateness of developing on land within a high risk flood zone

10. The site is part of a wider residential allocation which acknowledges that the site sits within a high risk flood zone (3a) for surface, fluvial and tide, owing largely to its proximity to the Wealdstone Brook to the north. Flood zone 3a indicates that flooding risk is high on the site but it does not necessarily indicate that development on the land is inappropriate, as is the case with land in flood zone 3b which generally indicates that a site should be retained undeveloped as functional flood plain.
11. The draft site allocation for Watkin Road does not indicate that the flooding designations on site should preclude development opportunities but does acknowledge that flood mitigation measures will be necessary and that flood mitigation should not compromise a high quality deliverance of public realm and interface between street and ground floor use. The development proposals achieve this allocation requirement and this will be detailed in depth in later sections of this report. Furthermore, the applicant's drainage strategy (as detailed below) presents an opportunity to provide flood risk betterment on site.
12. On this basis, it is considered that as long as there is no real increase in flood risk, and ideally betterment as established through improvements to site drainage, that an approach of moving forward with a mixed

use scheme at this site is an appropriate position to support. The Environment Agency have been consulted on the proposal and have raised no objections to the site's development in principle from a perspective of flood risk.

Affordable Housing and Unit Mix

Adopted affordable housing policy

13. London Plan policy 3.12 requires boroughs to seek the maximum reasonable amount of affordable housing, taking account of a range of factors including local and regional requirements, the need to encourage rather than restrain development and viability. The policy requires boroughs to take account of economic viability when negotiating on affordable housing, and other individual circumstances.
14. Adopted DMP policy DMP 15 confirms the Core Strategy target (policy CP2) that 50% of all new homes in the borough will be affordable. The maximum reasonable amount will be sought on sites capable of providing 10 units or more, such as this scheme. 70% of new affordable housing should be social/affordable rented housing and 30% intermediate housing at affordability levels meeting local needs. Where a reduction to affordable housing obligations is sought on economic viability grounds, developers should provide a viability appraisal to demonstrate that schemes are maximising affordable housing output.

Emerging affordable housing policy

15. The emerging London Plan (Intend to Publish Version) affordable housing policy (H4, H5 and H6) sets out the Mayor's commitment to delivering "genuinely affordable" housing and that the following split of affordable housing provision is applied to development proposals:
- A minimum of 30% low cost rented homes, allocated according to need and for Londoners on low incomes (Social Rent or London Affordable Rent)
 - A minimum of 30% intermediate products
 - 40% to be determined by the borough based on identified need
16. Brent's emerging local plan policy (BH5) is similar to DMP15 in the adopted plan, but sets a strategic target of 50% affordable housing while supporting the Mayor of London's Threshold Approach to applications (policy H5), with schemes delivering at least 35% (or 50% on public sector land / industrial land and that propose a policy compliant tenure split) not viability tested at application stage. Brent Policy BH5 sets a target of 70% of those affordable homes being for social rent or London Affordable Rent and the remaining 30% being for intermediate products. This split marries up with the Draft London Plan H6 policy by design, with Brent having considered that the 40% based on borough need should fall within the low cost rented homes category, bringing Brent's target split across both emerging policies as 70% for low cost rented homes (Social rent or London Affordable Rent) and 30% for intermediate products.
17. Brent's draft Local Plan has yet to be examined by the Planning Inspectorate and as such the adopted DMP15 policy would carry considerably more weight than the emerging policy at present. The draft London Plan is at a more advanced stage than Brent's emerging Local Plan and has been subject to comments from the Planning Inspectorate. Whilst concerns have been raised about some London Plan draft policies by the inspectorate, none of those concerns relate to these policies and it can therefore be considered that this draft policy carries reasonable weight at this stage.

Affordable housing offer

18. The applicant's initial affordable housing offer saw 35% of the development offered as affordable housing when measured by habitable room, with 60% of this housing comprised of Affordable Rented housing (capped at 80% of the local market rent) and the other 40% comprised of shared ownership housing. The applicant's supporting financial viability assessment indicated that this offer would return a deficit of £1.18m and therefore represented more than the reasonable amount of affordable housing. Nonetheless, the above offer fails to meet some key requirements of emerging affordable housing policy, namely; the offer does not include low cost rented homes (either Social Rent or London Affordable Rent) as required by emerging London Plan policy H6 and draft Brent policy BH5 and the offer does not target a policy compliant tenure split for 70% of the affordable housing to be low cost or affordable rented housing and for 30% of the affordable housing to be intermediate affordable housing, instead targeting a 60%/40%

split.

19. Given the lack of acceptability of this initial offer, officers appointed BNP Paribas to make its own assessment of the scheme's financial viability and to identify an alternative affordable housing offer which included low cost rented housing (London Affordable Rent), which targeted a policy compliant tenure split and which did not exceed the financial deficit reached within the applicant's original offer (£1.18m) which the applicants had confirmed they were willing to proceed with. BNP Paribas identified that an affordable housing offer as follows would likely return a deficit of circa. £1.17m and would therefore represent more than the maximum reasonable amount of affordable housing when targeting the emerging London Plan policy conditions:

*Unit s	Private	Affordable		Intermediate S h a r e d Ownership	Total
		London Rent	Affordable		
1 & 2 bed	139	6		3	1 4 8 (85%)
3 bed	16	7		3	26 (15%)
Total	1 5 5 (89.1%)	13 (7.5%)		6 (3.4%)	1 7 4 (100%)

20. This offer represents 11% affordable housing by unit, and a 68:32 tenure split ratio between London Affordable Rent : Shared Ownership. In reaching this conclusion, BNP Paribas assumed that the developer would receive open market rents for the commercial floor space, and as such there has been no trade off made between affordable workspace provision and affordable housing provision. Were the actual discount market rents for the affordable workspace to be assumed as part of this model, the viability position reached would have been less favourable than the one reached above.
21. Whilst this offer would satisfy the requirements of Brent's emerging affordable housing policy BH5 since it offers a suitably low cost rented product at a policy compliant tenure split, the offer falls short of the GLA's threshold approach identified within emerging London Plan policy H6, whereby applications can be 'fast-tracked' without further FVA scrutiny if proposing 35% affordable housing (as measured by habitable room) when targeting an H6 compliant tenure split (set out above). Furthermore, the incorporation of the above tenure arrangement within the applicant's proposed building massing would prove difficult given that only a small part of one of the buildings would contain affordable housing, necessitating a convoluted sub-division of one of the buildings for management purposes. Given these factors, the applicants have opted to increase the affordable housing offer from the base offer identified above to the following:

Unit type	L o n d o n Affordable Rent units	S h a r e d Ownership units	Total
Studio	0	1	1 (2%)
1 bedroom	8	8	16 (32%)
2 bedroom	0	8	8 (16%)
3 bedroom	7	18	25 (50%)
Total	15 (30%)	35 (70%)	50 (100%)

22. This offer represents 29% affordable housing by unit or 35% affordable housing by habitable room, and a 30:70 tenure split ratio between London Affordable Rent : Shared Ownership.
23. Officers welcome the applicant's proposed uplift beyond the demonstrated maximum reasonable amount of affordable housing, incorporating 19 additional shared ownership units and 2 additional London Affordable Rented units beyond that which was identified as the maximum reasonable amount of affordable housing when achieving a policy compliant tenure split. The additional units which have been offered result in the overall tenure split of the affordable housing becoming heavily weighted towards shared ownership, however, the offer incorporates all of the components of the identified maximum reasonable tenure split policy compliant offer modelled by BNP Paribas and can therefore be assuredly confirmed as an offer that is significantly in excess of the maximum reasonable amount of affordable

housing when targeting a policy compliant tenure split. The affordable housing offer is also compliant with the tenure split requirements set out in policy H6 of the emerging London Plan as it provides at least 30% of its affordable housing as Low Cost Rented housing (London Affordable Rent) and at least 30% of its affordable housing as intermediate (shared ownership housing).

24. Despite the offer being acceptable (and thus exceeding the maximum reasonable amount of affordable housing that the site can deliver), the offer falls short of the 50% policy compliant target set out in policy DMP15 and an early and late stage review mechanism will therefore be secured in a s106 agreement to capture any uplift in affordable housing.

Location and quantum of housing

25. The affordable housing is proposed to be contained entirely within the northern block of the two proposed blocks, leaving the southern block as that which contains the private accommodation. The two blocks are to be provided with very similar visual treatment and entrance areas, resulting in there being minimal visual differences between the private and affordable blocks.

26. Combining the two blocks, the residential provisions across the whole scheme are set out in the table below:

Unit type	P r i v a t e units	L o n d o n Affordable Rent Units	S h a r e d Ownership Units	Total
Studio	16	0	1	17 (9.8%)
1 bedroom	48	8	8	64 (36.8%)
2 bedroom	59	0	8	67 (38.5%)
3 bedroom	1	7	18	26 (14.9%)
Total	124 (71.3%)	15 (8.6%)	35 (20.1%)	174 (100%)

27. The residential provisions within each of the blocks is set out in the table below:

Northern block (affordable tenures)

Unit type	L o n d o n Affordable Rent units	S h a r e d Ownership units	Total
Studio	0	1	1 (2%)
1 bedroom	8	8	16 (32%)
2 bedroom	0	8	8 (16%)
3 bedroom	7	18	25 (50%)
Total	15 (30%)	35 (70%)	50 (100%)

Southern block (private tenure)

Unit type	Private units
Studio	16 (12.9%)
1 bedroom	48 (38.7%)
2 bedroom	59 (47.6%)
3 bedroom	1 (0.8%)
Total	124 (100%)

Wider acceptability of tenure mix

28. Brent's core strategy policy CP2 seeks for at least 25% of units to be family sized (three bedrooms or more). Brent's emerging policy BH6 within the draft Local Plan carries forward this same target. The proposal achieves a reasonable proportion of family sized accommodation (15%) although this is acknowledged as falling short of the 25% target.

29. Whilst acknowledging the shortfall, it is strongly welcomed that the applicant's affordable housing offer assigns the family sized units strongly towards the affordable tenures where need is greatest. In

demonstrating this, 96% (25 out of 26 units) of the scheme's family accommodation sits within the affordable tenures block, whilst 50% of the scheme's affordable housing is comprised of family sized homes (47% in the London Affordable Rented tenure and 51% in the Shared Ownership tenure).

30. In the context of market driven residential development, officers acknowledge the reality of there being a fine balance to strike between scheme viability and family home provision, with a greater percentage of three bedroom homes generally resulting in less viability for affordable housing provision. On balance, the 15% provision of family homes is considered acceptable given the significant over-representation of the family accommodation within the affordable tenures and in acknowledgement of the scheme viability position, for which it has been confirmed that the agreed affordable housing level is significantly in excess of the maximum viable amount.

Design

31. Brent's DMP1 policy and SPD1 guidance set out the policy objectives and general requirements for good design in the built environment. Overall, officers consider that the proposal responds positively to this policy and guidance context and the specific elements of its design including: general layout, public realm, height and massing and architecture/materiality are discussed in the following sections.

Layout and public realm

32. The development site is split into two. The southern site forms units 1, 2 and 3 on the south western side of Watkin Road and fronts onto Watkin Road to the north east and north west, Fulton Road to the south west and unit 4 of Watkin Road to the south east. This southern site is therefore located on a prominent corner along Fulton Road, one of the main thoroughfares through the Wembley Park area. The northern site forms unit 9 of Watkin Road on the north eastern side of the road. The site borders Watkin Road to the south-west, the under construction development of 10-11 Watkin Road to the north-west, the Wealdstone Brook to the north-east and unit 8 of Watkin Road to the south-east. Each of the sites is to accommodate a new residential block, as follows.
33. The southern site would contain a building that, in part, extends to 20 storeys in height and in part extends to 17 storeys in height, whilst the northern site would contain a building that extends to 14 storeys in height.

Southern site

34. The southern site comprises all of the development's commercial floor space (floors ground to two) and all of the development's private residential accommodation (floors three and upwards). The residential accommodation is accessed from a wide, colonnade covered frontage on the north eastern elevation, at the corner with Fulton Road. The residential lobby area and the base of the residential core is contained on the south western side of the building and fronts both Watkin Road and Fulton Road. The B1c affordable workspace is also located along this elevation from an adjacent entrance. The B1a commercial unit is also directly accessible at ground level, from the north eastern elevation along the main spine of Watkin Road. The ground floor is largely comprised of residential bin stores, commercial bin stores, commercial bike stores and back of house / plant spaces for both the residential and commercial uses. A basement level is also provided for this building, containing plant rooms only.
35. The first floor level is largely comprised of the B1c affordable workspaces, fronting the two Watkin Road frontages and the Fulton Road frontage. A large residential bike store is also provided on this level, occupying the eastern part of the block. The second floor level is entirely commercial in nature and will be comprised of the largest units forming the scheme's commercial affordable workspace offer.
36. From third floor and upward, the building is entirely residential and would see 8 residential units being provided on each floor, up until the 16th floor. The 17th floor has a reduced massing, providing 4 units per core across the 17th, 18th and 19th floors, with a communal rooftop garden being provided atop the eastern half of the block at 17th floor level, in place of the massing that would no longer be present at the higher levels. Above the 19th floor, at the building's apex, an additional roof garden is provided for residents.

Northern site

37. The northern site comprises all of the development's affordable rented and shared ownership housing.

The residential accommodation is accessed from a legible, covered access at the south western corner of the building, at its most prominent corner, across from the emerging development at 10-11 Watkin Road. The ground floor is formed of the entrance lobby and a resident's lounge on the east side of the block, the residential core and bin storage centrally in the block and plant rooms to the east side of the block.

38. The first floor is largely comprised of bike storage space for the flats but also includes two residential units on the building's south western and north western corners. From second floor upwards, four residential units occupy each corner of each floor plate. The tallest residential storey is the 13th floor, and above this is a residents' rooftop amenity space.

Public Realm

39. In terms of providing a good quality external environment for residents and passers-by, active frontages have been maximised at street level. The main residential entrance to the southern block is focussed on the small section of Watkin Road which is perpendicular to Fulton Road and is provided underneath a colonnade. The entrance is accessed through a short stair and ramp access and sits slightly higher than the road in order to adhere to ensure a safe flood level for the building, owing to the proximity of the Wealdstone Brook. The colonnade feature would correspond with the colonnade feature used at the 10-11 Watkin Road site across the road and would act as a clearly legible and inviting means of defining the main entrance. A new landscaped area will be provided in front of the colonnade incorporating two new trees. The public realm along Fulton Road would largely be formed of active frontages serving the residential reception area and back of house office space. A small stretch of inactive frontage will be present at the end of the Fulton Road frontage, where substation and generator access doors will be located. The public realm along Watkin Road would be comprised of active frontages to the commercial space, including the main entrance to the commercial spaces as well as a small stretch of inactive frontage at the eastern edge of the frontage, accommodating commercial and residential bin stores. The Watkin Road frontage would also contain a refuse presentation area for use on collection days, as well as the main servicing layby and two disabled parking bays.
40. The smaller northern block would be located across from the southern block, on the northern side of Watkin Road. The blocks entrance would be at the south western corner of the block, closest to the Fulton Road/Watkin Road junction, and, as with the southern block, would be a covered colonnade entrance accessed through steps or a ramp that ensure the building sits at an appropriate level to mitigate the risk of flooding given the proximity of the Wealdstone Brook. The area to the east of the block would be landscaped with new tree planting and would contain the alternative ramped access to reach the main entrance area. The landscaped area would immediately adjoin with the landscaped area forming part of 10-11 Watkin Roads emerging development and the two areas together would form a 13m x 20m public landscaped area between the buildings. This area also sits adjacent to the boundary with the Wealdstone Brook banks and the open space across both sites in this area has ensured potential for increased brook access and restoration works to take place from here in the future. If this were delivered down the line, it would have a local public amenity benefit as well as positive implications for local ecology and climate change adaptation. The western frontage of the northern block (to the landscaped area) would be a fully active frontage, with four windows being provided to the residents indoor amenity lounge. The southern frontage of the northern block (to Watkin Road) would be a mixture of active (windows to the residential lobby) and inactive (doors to the bin store and substation/generator). The pavement on this side would also be amended to provide two additional on-street disabled parking spaces and a small refuse presentation area at the eastern end of the frontage.
41. The public realm proposals are considered to be highly positive, with active frontages having been reasonably maximised at ground level, interest and strong legibility having been provided by the colonnade features and new landscaping having been introduced in the public realm, especially at the base of the northern block. Despite the need for the ground floor level across both buildings to be raised up by a small amount to account for flood risk, the active frontages remain well-grounded and do not appear severed from the street scene.
42. In establishing a good connection between the two sites, the applicants would deliver a step free pedestrian crossing across Watkin Road, which would incorporate dropped kerbs and tactile paving.

Scale, height, massing and design of the development

Height and Massing

43. Policy WEM5 of the adopted Wembley Area Action Plan (2015) supports the development of tall buildings (defined as being 30 metres (about 10 storeys) or greater) on the basis of its site specific tall buildings strategy. This site in the Wembley Area Action Plan is shown as a site which is inappropriate for tall buildings under WEM5 criteria, although is close to existing and emerging tall buildings including Scape Wembley (28 storeys), 10-11 Watkin Road (24 storeys), Quintain plot NE06 (34 storeys) and Parkwood House (17 storeys).
44. Draft policy BD2 of the emerging Local Plan (which is intended to be adopted later this year) directs tall buildings to the locations shown on the policies map in Tall Building Zones, intensification corridors, town centres and site allocations. Whilst the entire development site sits within a tall buildings zone it is noted that the southern site sits within the 'core' section of the zone whilst the northern site is split between the 'core' section of the tall buildings zone and the general section of the zone. Furthermore, the emerging site allocation within Brent's emerging Local Plan notes that "tall buildings will be acceptable taking into account the need to mediate between heights of the adjacent Wembley masterplan sites, plus Parkwood House, Apex House and Amex House and Empire Court".
45. Whilst the Wembley Area Action Plan (WAAP) is still the adopted local policy document for consideration, the emerging changes to policy as observed within BD2 of the emerging Local Plan are to be acknowledged and stand testament to the substantial increase in housing targets that have come into relevance since the publishing of the WAAP. Furthermore, emerging London Plan policy can now be afforded substantial weight and the sustainability of this location within an area of good public transport accessibility is acknowledged.
46. The Watkin Road site allocation sits close to the edge of the masterplan zone, although covers a significant area with locations to the south and west of the allocation site being less sensitive and close to dense development (either built or consented) and locations to the north and east of the allocation site being more sensitive given their proximity to lower scale development (low scale industrial and the residential buildings forming Empire Court) where no change is anticipated in current or emerging policy. This development site sits centrally within the site allocation and is adjacent to development of significant density, particularly in the southern section. It is acknowledged that the northern part of the development site would act as a buffer space between the tall emerging development of 10-11 Watkin Road to the west and the Wealdstone Brook and low-scale Empire Court to the east and should be designed accordingly.
47. The proposal seeks a development of up to 20 storeys within the southern site, stepping down to 17 storeys on its eastern side. It is noted that this building would sit on a prominent junction (Watkin Road/Fulton Road) within the eastern side of the masterplan area. The plot is visually prominent, particularly from the junction of Olympic Way and Fulton Road, where it would centrally frame the view eastwards along Fulton Road. However, it is also noted that the plot is located fairly centrally in a site allocation and that its location is slightly more peripheral to the masterplan area than the immediately neighbouring sites to the west and south, such as 10 – 11 Watkin Road (24 storeys), Quintain NE05 (23 storeys) and Quintain NE06 (34 storeys). When taking this emerging context into account, the proposal for a building between 17 and 20 storeys on this plot is considered to result in a proposal which would clearly and appropriately mediate between the taller heights and denser development to the east and south and the requirement for development to transition to a smaller scale at the western edges of the site allocation. This massing will also provide a prominent landmark framing for the view along Fulton Road from the west, as shown in the applicant's Townscape and Visual Impact Assessment.
48. The proposal seeks a development of 14 storeys within the northern site. Unlike the southern site, this building would not sit on a prominent junction and would sit more peripherally within the site allocation adjacent to the Wealdstone Brook, across from which the Empire Court development (4 storey apartment blocks) sits. The block would, however, sit immediately adjacent to 10 – 11 Watkin Road (24 storeys) to the east. The 14 storey massing is considered to result in an effective transition between the two developments, being 10 storeys lower than the 10 – 11 Watkin Road development to the west and 10 storeys higher than the existing Empire Court development across the brook to the east. It also provides a meaningful reduction in height from the emerging developments to the east in terms of setting a precedent for continued reductions in height as developments further east within the allocation site come forward. The 14 storey massing would also respond effectively to the transitional tall building zone within which the northern site sits (between the 'core' and general tall buildings zone), proposing a massing which is not significantly in excess of the base definition of tall buildings as set out in the emerging Local Plan and WAAP (i.e. 30 metres or about 10 storeys).
49. The proposal would sit within the viewing corridor of the Wembley Stadium Arch as seen from Chalkhill

Park, which is a strategically protected view within the WAAP Policy WEM6 and Brent's emerging Local Plan Policy BHC2. The applicant's Townscape and Visual Impact Assessment illustrates the impact the development would have on this view. Whilst the northern site's block would not impede the view of the Wembley Stadium Arch from the park, the southern site's block would impede the view of the arch to an extent on the building's eastern side. The part of the building which has been reduced in height to 17 storeys is the part of the building which would obscure the arch and the reduction in height from 20 to 17 storeys has helped to ensure that this impact has been reduced. It is noted that consented massing forming part of the Quintain masterplan already visually impedes the eastern extent of the arch from this view and that this development would buffer the view of the western arm of the arch to a similar extent, resulting in a more symmetrical framing for the part of the arch which would remain clearly visible. The GLA has also considered the visual impact on the arch from a strategic perspective and notes the following: *"Although the buildings will result in the partial reduction in the extent of sky visible, these buildings will be seen alongside other existing and emerging high-rise development that populates the skyline in this locality. Views of the lowermost portion of the Wembley Stadium arch will be interrupted, however due to the way in which the massing steps down from the west, the profile and silhouette of the arch will remain. The height and massing of the proposed development is acceptable from a strategic perspective"*.

Architecture and Materiality

50. The visual design and architecture of the buildings is pleasing, relying on a simple rectilinear massing with a brick heavy external appearance, helping to establish a residential character. The architecture is mainly based on the use of yellow multicolour brick in the case of the taller southern block and the use of red and dark red multicolour brick in the case of the northern block. The taller block incorporates the use of a darker shade of brick at ground level to clearly define the colonnade portion of the frontage and to provide a distinctive ground layer for the building. The architectural features across the facades are neatly arranged in vertical stacks to emphasise the slenderness of the buildings. A dark brown metal appearance for the balcony balustrades would be a significant secondary feature of the building's appearance.

51. Samples of the materials to be used in the development will be reviewed and approved by officers prior to any above ground works, and this would be secured by condition.

Impact to Heritage Assets

Conservation Areas and Listed Buildings

52. Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 respectively require the decision maker to have "special regard" to the desirability of preserving a listed building or its setting, and pay "special attention" to the desirability of preserving or enhancing the character or appearance of a conservation area. The Grade II Listed Wembley Arena is located approximately 460 metres to the south west whilst the Grade II listed Brent Town Hall (now used as the Lycée International de Londres Winston Churchill) is located approximately 570 metres to the north. About 500 metres to the north is the southern boundary of the Barn Hill Conservation Area.

53. The applicants have submitted a detailed Townscape and Visual Impact (TVIA) assessment. The NPPF states that where a proposed development will lead to substantial harm to designated heritage assets, permission should be refused unless it can be demonstrated that the substantial harm is necessary to achieve substantial public benefits that outweigh the harm or in wholly exceptional circumstances identified in paragraph 195 of the NPPF. Where the proposal will lead to less than substantial harm, that harm should be weighed against the public benefits of the proposal.

54. Where harm is found to a designated heritage asset (even harm that is deemed to be less than substantial), the decision maker must give that harm considerable importance and weight as a result of the statutory requirements set out in Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. London Plan Policy 7.8, Policy HC1 of the Mayor's Intend to Publish London Plan, policy DMP7 of the adopted Development Management Policies and policy BHC1 of the draft Local Plan all seek to ensure that development affecting heritage assets should conserve their significance, by being sympathetic to the character and setting of those assets.

55. The submitted TVIA is considered to be robust and demonstrates that the proposal would be seen in the context of other tall buildings within the Wembley Opportunity Area and that there would be no harm to

the setting of designated heritage assets.

Archaeology

56. Beyond the visual impact considerations that relate to heritage, the site has been assessed for its below ground archaeological potential and the applicants have submitted a report to communicate the findings. The report confirms that no World Heritage Sites, Scheduled Monuments, Historic Battlefields or Historic Wrecks lie within 1km of the site. The site is also not within one of Brent's Archaeological Priority Areas (APA) or locally designated Sites of Archaeological Importance (SAI).
57. The history of the site has largely been as agricultural land until the area became managed parkland forming part of the wider Wembley Park during the late 19th/early 20th Century. Later, aerial imagery indicates that Watkin Road's existing industrial buildings were built out in the late 1940s/ early 1950s. The development plots are to the north of the main site of the British Empire Exhibition (1924-1925) and there are no buildings shown on the development plots of land on the diagrammatic 1924 plan of the Exhibition. Because of this, it is concluded that the site has a low archaeological potential for all past phases of human activity.
58. Borehole logs from nearby sites (Amex House and Fernlea House) have been negative in their results with the area of the national stadium and its immediate vicinity having been subject to intense truncation, thus having removed potential archaeological deposits.
59. For the above reasons, further archaeological mitigation is not recommended.
60. The Council's heritage officer agrees with the findings of the report and that no further archaeological mitigation measures should be required.
61. As a result, the proposal accords with London Plan Policy 7.8, Policy HC1 of the Mayor's Intend to Publish London Plan, policy DMP7 of the adopted Development Management Policies and policy BHC1 of the draft Local Plan and the NPPF.

Impact on amenities of neighbouring properties

62. Brent's DMP1 policy within the emerging and adopted Local Plan and Brent's SPD1 guidance sets out a number of criteria for judging impact on neighbouring residential properties in terms of losses of privacy and the creation of a sense of enclosure. It will be important to consider the extent to which the SPD1 guidance is complied with in relation to these properties, and for this impact to be weighed up as part of an overall judgement. The SPD1 amenity impact tests and the development's performance against them are explained below.

Privacy

63. In order to retain acceptable privacy levels to properties, the amenity impact considerations consider that all primary habitable room windows within the property should be at least 9m from the boundary with the private external amenity space of neighbouring properties or adjoining sites, except where the view on to that property would be to a part of the property which would serve as low value amenity space (e.g. the side access around a house). All secondary habitable room windows and non-habitable room windows should be obscure glazed if they cannot achieve this standard too. Furthermore, the proposed habitable room windows should achieve a full 18m of separation from the habitable room windows of other properties (apart from street facing windows). These standards are in the interests of protecting the privacy of neighbouring occupiers.

Sense of enclosure

64. In the interests of ensuring that the development does not appear unduly overbearing to surrounding properties, SPD1 establishes a standard for new development to sit underneath a 45-degree line drawn from a 2m height at the nearest edge of an affected property (including side and rear garden boundaries) towards the proposed buildings. The proposed buildings should also sit underneath a 30-degree line drawn from a 2m height at the nearest rear habitable room windows within neighbouring properties that face towards the proposed buildings.
65. In the event that these relationships cannot be achieved, a careful balance of this harm in the context of the other considerations should be made. A full test of daylight and sunlight impact on surrounding

properties can also assist in understanding and weighing up the harm in the balance of considerations. Daylight and sunlight testing has been carried out and is discussed in the next section.

Application of guidance relating to privacy and sense of enclosure to the proposal

66. In the context of the guidance, the impact to each of the neighbouring sites is discussed below.
67. The northern site borders the emerging 10-11 Watkin Road development to the west. The proposed block will be separated from the façade of 10-11 Watkin Road across a 14 metre gap. The north western flats in this block will have a western aspect towards this development, therefore having windows facing towards the windows of the north-eastern flats of 10-11 Watkin Road at a distance of 14 metres. Given that the windows would face one another across a publicly accessible landscape area, including a new public pedestrian path between Watkin Road and North End Road, and given that the windows of the affected flats within the 10-11 Watkin Road scheme and the 9 Watkin Road scheme would both be secondary windows in dual aspect flats, this relationship is considered to be comfortable and will not unduly compromise privacy or outlook for residents in either scheme.
68. The northern site borders the low-rise unit 8 Watkin Road to the east, currently in use for car-repair services. The proposed building would be located about 1 metre from the boundary with this unit although would not rely on this eastern aspect for outlook within 9 metres of the boundary. Instead, obscure glazed windows which would open only at high level are proposed along this flank facade. Balconies serving the flats on this side of the property would have a secondary eastern aspect towards no. 8 Watkin Road. Suitable screening to prevent eastward facing outlook from these balconies would need to be secured by condition so as not to prejudice the ability of the neighbouring site to be developed. Subject to this condition, the proposal would not rely on outlook towards 8 Watkin Road and would therefore not prejudice the ability of this site to be developed.
69. The northern site borders the Wealdstone Brook to the north and the established residential Empire Court estate beyond this. The Wealdstone Brook banks are heavily vegetated on both sides with thick tree canopy cover. This tree cover would largely buffer much of the visual relationship between the Empire Court environment and this development. Nonetheless, were the trees not in situ, the proposed block is about 30 metres from the edge of the nearest block in Empire Court (The Lodge) at the closest point, in excess of distance required to maintain a good level of privacy in a private setting. The part of the Empire Court estate between the Wealdstone Brook and The Lodge forms part of the car park of the estate and does not constitute part of the formal amenity space offer of the development. Furthermore, the L-shaped block forming The Lodge has a mixture of south facing and west facing windows with none of these windows facing the proposed northern block and a few of the southernmost west facing windows facing the northern block, but indirectly and only following a separation gap of at least 48 metres. Moreover, when the thick tree cover separating the sites is taken into account, officers would not deem tests of the 30 and 45 degree rule to be relevant in the context of this site and it is considered that the mitigating factors discussed above would suitably address any potential unacceptable amenity impact that could be incurred on Empire Court.
70. The northern site borders the public highway to the south and would retain an 18 metre gap between its southern façade and the northern façade of the southern block across the public highway, resulting in a good level of separation in line with SPD1 guidance, especially in the context of a public setting such as this.
71. The southern site borders the public highway on three sides, to the north, west and south. The southern site borders unit 4 Watkin Road to the east. As with the northern site's relationship with unit 8, the proposed building would be located about 1 metre from the boundary with this unit although would not rely on this eastern aspect for outlook within 9 metres of the boundary. Instead, obscure glazed windows which would open only at high level are proposed along this flank facade. Balconies serving the flats on this side of the property would have a secondary eastern aspect towards no. 4 Watkin Road. Suitable screening to prevent eastward facing outlook from these balconies would need to be secured by condition so as not to prejudice the ability of the neighbouring site to be developed. Subject to this condition, the proposal would not rely on outlook towards 4 Watkin Road and would therefore not prejudice the ability of this site to be developed.
72. Given that the sites do not border with any private residential dwellings across a private setting (aside from Empire Court which is discussed above separately), the tests of 30 and 45 degrees are not relevant in this setting.

Summary on privacy and sense of enclosure

73. It is considered that the relationship of this development to its surroundings complies with relevant guidance in SPD1. Most of the neighbouring relationships are across public space and establish suitable separations by virtue of suitably wide landscaped areas or across public highways. The scheme adjoins three sites across a private setting, 4 Watkin Road, 8 Watkin Road and Empire Court. In the case of 4 and 8 Watkin Road, there will be no reliance on outlook towards these sites and in the case of Empire Court, the nature of the relationship between the proposal and this site has a number of mitigating factors which would address the amenity impact relationship between the sites without the application of 30/45 degree guidance.

Daylight and Sunlight Impact

74. The applicants have submitted a numerical daylight and sunlight analysis prepared by industry experts. The submission has tested the following properties in terms of how the proposed development would affect daylight and sunlight to the windows of these buildings in line with BRE criteria:

- Amex House
- Empire Court – Block 1 (western block on the north side of North End Road)
- Empire Court – Block 2 (eastern block on the north side of North End Road)
- Empire Court – Block 3 (eastern block on the south side of North End Road)
- Empire Court – The Lodge (western block on the south side of North End Road)
- 10-11 Watkin Road
- Quintain Masterplan outline consent to the south

75. The results of the daylight and sunlight testing of these properties is set out below:

Amex House

76. This development to the north east of the site is substantially complete and forms a development of 195 flats across North End Road from the development site.

77. 371 windows are relevant for testing and 346 (93%) will meet the BRE guidelines for the Vertical Sky Component, retaining a Vertical Sky Component (VSC) factor of at least 27% or seeing a reduction from the existing scenario Vertical Sky Component of no more than 20%. This leaves 25 windows which will fall short of the BRE guidance for VSC, with the worst case failure seeing a circa 50% reduction in resulting VSC compared to existing VSC. In nearly all cases, these windows which fall short of BRE guidance are located within dual aspect flats where the light received from other directions would be unaffected. As such, it is considered that a suitable mitigating factor is present in most instances. The No Sky Line (NSL) test relates to rooms rather than windows, and assesses the proportion of a room from which sky would be visible. Where the reduction in the parts of the room from which sky would be visible is less than 20%, the BRE guidance is passed. Of the 240 rooms tested in Amex House, 228 (95%) meet the NSL test. Of the 12 rooms which fail, just one of these rooms will see the sky visible from less than half of the room, meaning the 11 rooms which see more than a 20% reduction will still see daylight distribution to a majority of the room. For living rooms, the worst reduction will be about 28% compared to the existing scenario and for bedrooms, the worst reduction will be about 36% compared to the existing scenario. In terms of the sunlight impact, 349 (94%) of the 371 windows tested meet the criteria for winter probable sunlight hours and 359 (97%) meet the criteria year round probable sunlight hours. The worst case scenario for sunlight losses is to a living room on the first floor which would see a 40% loss of summer sunlight, a 57% loss of winter sunlight and a 50% loss of annual sunlight. As a result, there are some isolated breaches but the vast majority of the windows will meet the BRE guidance.

Empire Court – Block 1

78. This building is located to the north of the site and comprises four storey flatted development. 103 windows are relevant for testing at this building and 93 (90%) will meet the BRE guidelines for the VSC. The 10 windows which don't meet the guidance have failures of between 20% reduction compared to the existing (the 'pass' mark) to a 27% reduction compared to the existing. Of the 10 windows that don't meet VSC guidelines, it is noted that for nine of these, the existing windows have VSC values of between 6% and 13%, making them very sensitive to large percentage changes, even in the context of small perceptible changes. The other window which has a higher starting VSC only marginally fails with a resulting VSC that is 20.43% less than the starting VSC. The NSL test sees all rooms tested meeting the criteria. In terms of sunlight testing, 93 windows (90%) will meet BRE guidelines for winter sunlight and

81 windows (79%) will meet BRE guidelines for annual sunlight. The 22 windows which will not meet BRE guidelines are restricted to locations at the lower levels of the building. The worst case scenario for sunlight losses is to a ground floor window which would see a 14% reduction in summer sunlight, an 85% reduction in winter sunlight and a 38% reduction in year round sunlight. Such instances are the exception rather than the rule in the context of the wider results and the majority of windows at this block will meet BRE guidelines.

Empire Court – Block 2

79. This building is located to the east of Empire Court – Block 1 and comprises four storey flatted development. All of the windows and rooms tested at this property meet the BRE guidelines for daylight (VSC and NSL testing), resulting in negligible daylight impact to this property. In terms of sunlight, none of the windows would see more than a 20% reduction in the annual sunlight hours, although 15 out of 96 (15%) would see more than 20% reduction in the winter sunlight hours. Only 4 of these would be losses of greater than 36%, with the highest loss to a window being 57%.

Empire Court – Block 3

80. This building is located to the south of Empire Court – Block 2 and comprises four storey flatted development. All of the windows and rooms tested at this property meet the BRE guidelines for daylight (VSC and NSL testing), resulting in negligible daylight impact to this property. In terms of sunlight, just 2 windows out of 144 would see more than a 20% reduction in the annual sunlight hours, with a 21% and 25% reduction in annual sunlight respectively, both only marginally falling short of the criteria. When it comes to winter sunlight hours, 6 out of 144 (4%) windows would see more than 20% reduction from the existing scenario, with the most significant loss being a 50% reduction.

Empire Court – The Lodge

81. This building is located to the west of Empire Court – Block 2 and comprises a two storey building with first floor residential accommodation. All of the windows and rooms tested at this property meet the BRE guidelines for daylight (VSC and NSL testing), resulting in negligible daylight impact to this property. In terms of sunlight, 7 windows are relevant for testing and 4 of these would lose more than 20% of the existing annual probable sunlight hours, with the reductions being 20.45%, 27.59%, 28.13% and 30.30% respectively. These same 4 windows would also see a >20% reduction in winter sunlight hours, with the greatest loss being 33%.

Ten and Eleven Watkin Road

82. This 24 storey building will be located to the north west of the development site and is currently under construction. The property is currently surrounded by low rise industrial properties to the east, experiencing very good baseline levels of daylight. 326 windows are relevant for daylight testing and 134 (41%) will meet the BRE's VSC criteria. Of the 192 remaining windows, 107 of these are bedrooms which are acknowledged as having a less important requirement for light within the BRE guidelines. There will be perceptible alterations to VSC to the remaining 85 windows, ranging from an average of circa 50-60% reduction across the 2nd to 9th floors, with retained VSC levels averaging around 10-13%. From the 10th floor, the retained VSC levels increase and average around 17%, a common VSC value seen in denser city environments, which is acknowledged in the BRE guidelines. NSL testing saw 263 rooms tested for daylight distribution with 156 (59%) meeting the BRE guidelines for this criterion. 230 of the rooms (87%) retain at least 50% daylight distribution, meaning the sky would continue to be seen from the majority of the room in most cases. Of the 33 rooms which would not have daylight to the majority of the room, 32 are bedrooms which are acknowledged as being less sensitive rooms within the BRE guidelines. There would certainly be perceptible changes to the standard of daylight at this property, however the dense, growth area setting is acknowledged, especially in the context of the BRE guidelines principally applying to good standard for daylight and sunlight in low density, suburban settings. The applicants have carried out a 'mirror analysis', mirroring the massing of 10-11 Watkin Road as closely as possible across both north and south sites to consider what a scheme of equivalent massing to 10-11 Watkin Road would result in were the scheme to have this more significant massing. The results returned from the mirror analysis (VSC and APSH) are closely commensurate with those for the proposed massing, indicating that the proposed development will result in retained levels of daylight and sunlight which are appropriate for this location.

83. In terms of sunlight impact, 295 (90%) of the 326 tested rooms will meet the criteria for winter sunlight and 220 (67%) of the rooms will meet the criteria for annual sunlight. Of the 106 windows which do not

meet the criteria for annual sunlight, 43 will retain an APSH of 20% or more, reasonably close to the minimum guidance amount of 25%. 263 (81%) windows therefore meet, or are close to the BRE guidelines for annual sunlight. Given that the proposed development site is located to the south east of 10-11 Watkin Road and that the 10-11 Watkin Road site currently benefits from a highly unobstructed outlook in this direction, sunlight impacts to 10-11 Watkin Road from a meaningful development of the site may be unavoidable.

84. The applicants have noted that the retained daylight (VSC) levels to 10-11 Watkin Road would be greater than those that have been retained to Amex House, suggesting that the retained values to 10-11 Watkin Road are better than the neighbouring amenity in other high density residential properties in the immediate locality.

Quintain Masterplan – Outline Consent

85. An outline consent is in place to the south of the site, across Fulton Road. Given that no detailed submissions have been made for this outline consent the applicant did not initially test specific windows and rooms as these have not yet been placed within the approved parameters of the building. Nonetheless, a full façade VSC range has been identified for the approved parameter plans based on the proposed massing. The identified VSC range shows that the lower levels of the approved building envelope directly across from the site would currently achieve VSC levels of between approx. 15% and 30% and that the proposed development would reduce this range to between approx. 12% and 20%. Quintain has submitted comments in relation to this, noting that the applicant's 3D visual model showing the VSC ranges across the facade would indicate that the VSC levels on some of the lowest residential levels would actually reduce to between 5% and 10%.

86. It is noted that the 3D visual model of the results does not indicate daylight results to a high level of precision and the applicants have therefore carried out a more detailed analysis of the daylight levels that would be received by this facade in the event that both this development and the Quintain Masterplan developments are delivered. This more detailed analysis has been carried out by pinpointing a series of hypothetical rooms (flats) located within the development facing elevation as approved within the Quintain Masterplan parameter plans. These hypothetical rooms have then been tested using the Average Daylight Factor (ADF) methodology (which is the relevant assessment criteria when considering proposed accommodation as opposed to existing accommodation) under the same conditions and formulae as were applied to the considerations of the Quintain Masterplan application (i.e. excluding galley type kitchens where they are located to the rear of Living/Kitchen/Dining (LKD) rooms, and where there is no expectation of natural light); using a 1.5% target criteria for these rooms (2% where kitchens have been assessed; and 1% for bedrooms). Of the 55 hypothetical room assessed, 51 (93%) rooms will meet the target criteria used in support of the Wembley Masterplan. This analysis confirms that the vast majority of rooms in this elevation will meet an acceptable daylight target for a dense urban masterplan such as this. The retained levels are consistent with many of the proposed units within the Wembley masterplan itself, despite a small number of rooms falling below 1.5% ADF. This analysis demonstrates that the proposed residential massing can achieve similar levels of ADF as achieved within the Quintain Masterplan and other considered developments in the immediate context. It would appear that the retained levels of daylight would be commensurate with those generally experienced in a high density location such as this. The daylight and sunlight impact at this Masterplan site could be considered at the full details stage of this development, and it may be that window sizes and room layouts could be planned accordingly to maximise daylight to these lower rooms in the knowledge of the impact from the proposed development.

Overshadowing to outdoor amenity spaces

87. The applicants have considered the impact to nearby outdoor amenity spaces. The relevant amenity spaces which are closest and which would warrant overshadowing testing are the communal gardens to the south of Empire Court – Block 1 and to the north of Empire Court – The Lodge. The BRE overshadowing assessment is passed where at least 50% of the garden area would retain exposure to at least 2 hours of direct sunlight during the 21st March. Both of the garden areas tested fully comply with this test and would be negligibly affected by the proposed development.

Summary

88. Overall, it is considered that the impact to the neighbouring sites is acceptable in the context of the benefits of the scheme. Officers would note that the BRE guidelines on which the daylight and sunlight analysis is based are designed to identify good levels of daylight and sunlight in low density locations and

that the guidelines acknowledge a need to interpret compliance flexibly in denser town centre locations. Furthermore, at paragraph 123 of the National Planning Policy Framework (NPPF), it is stated that “*when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)*”.

89. The growth area location and site allocation envisioning significant housing growth within this site and surrounding sites factor significantly into officers’ consideration that the overall impact is acceptable. The expectation for significant housing growth within this site, as set out in policy, would naturally reduce the expectations for full compliance with the daylight and sunlight guidance. It is also noted that the existing buildings on site are only 1 storey high and establish a very generous baseline scenario which would naturally result in a significant change in the context of any development proposal to deliver a reasonable number of homes.

Quality of residential accommodation

90. Policy DMP1 within Brent’s Development Management Policies (2016) and within Brent’s emerging Local Plan (2019) in addition to policy 3.5 of the adopted London Plan (2016) and D6 of the emerging London Plan (2019) require developments to achieve high quality standards of internal amenity and quality of accommodation. Policy DMP18 within Brent’s Development Management Policies (2016), 3.5 within the adopted London Plan (2016) and D6 of the emerging London Plan require adherence with the minimum internal space standards for new homes as set out in the London Plan. Further guidance on the quality of accommodation is set out in Brent’s SPD1 document (2018) and the Mayor’s Housing SPG.
91. Overall, the quality of the proposed residential units is high when assessed against these policies with all of the units proposed meeting the space standards set out within the London Plan. The built form is composed of relatively thin residential blocks with modest footprints and single cores that enable a reasonable number of the units to achieve dual aspect outlook and cross ventilation. The northern block has a smaller footprint and proposes 4 units per floor around its single core while the southern block’s larger size affords 8 units per floor around its single core. This is in compliance with the Mayor’s Housing SPG, which seeks no more than 8 units per core per floor in ensuring a good level of social cohesion for developments.

Aspect

92. In the northern block, the first floor would have just two units on the western side of the building, with the other half reserved for cycle parking. One of these units would be dual aspect whilst the other would be single aspect but with a secondary side window for light and cross ventilation. On all floors above this 50% of the units (two per floor) would have true dual aspect outlook and 50% of the units (two per floor) would have a single aspect outlook to the south west but with obscure glazed side windows to the south east and north west respectively to enable cross-ventilation and a secondary source of light.
93. In the southern block, 37.5% of the units (three per floor) would have true dual aspect outlook, 25% of the units (two per floor) would have single aspect outlook with obscure glazed side windows providing cross-ventilation and a secondary source of light, 25% of the units (two per floor) would have single aspect outlook to the south west and the remaining 12.5% of the units (one per floor) would have single aspect outlook to the north east. At the higher levels of the southern block, the number of units per floor reduces from 8 to 4; with all units in the slimmer part of the building on the 18th and 19th floors having true dual aspect. On the 17th floor, alongside the rooftop garden space, 50% of the units (two) would have true dual aspect whilst the other 50% (two) would have single aspect, with one flat’s aspect to the north east and one flat’s aspect to the south west.
94. The Mayor’s Housing SPG generally advises against the use of north facing single aspect units, and in this instance it is noted that whilst 12.5% of the units in the southern block have a single aspect to the north, the outlook is angled 32 degrees to the east of the true north direction, providing a good element of easterly aspect which would enable some direct sunlight in the morning hours, especially in the summer months.
95. Overall, the true dual aspect percentage in the northern block is 50% and in the southern block is 42%. When including those flats which have secondary sources of light and ventilation but with limited outlook, the dual aspect percentage in the northern block increases to 100% and in the southern block to 77%.

Accessibility

96. 10% of the homes (5 in the northern block and 12 in the southern block) are designed to be adaptable for wheelchair users and are accordingly sized so as to ensure suitable circulation space within each room for this purpose (M4(3) standard within the Building Regulations). Policy 3.8 within the adopted London Plan and Policy D7 within the emerging London Plan require 10% of new homes to meet the M4(3) fit out and the remainder to meet the M4(2) fit out which would be achieved in this instance.

Privacy and outlook

97. In terms of privacy between blocks, the proposal meets all standards set out in Brent's SPD1 (2018). The separation between the two blocks is significant, with the public highway of Watkin Road separating the two. Given the proximity to neighbouring land parcels, three of the units per floor in the northern block and two of the units per floor in the southern block would have their secondary sources of light to the side obscure glazed and non-openable at low levels. This is to ensure a suitable 9 metre outlook within the demise of the site to units 10 and 11 Watkin Road to the west and unit 8 Watkin Road to the east. All units would retain a good outlook in at least one direction and the discussion of dual aspect in paragraph x above already takes the obscure glazed windows into account, with reference to secondary sources of light being those windows which would be obscure glazed and therefore not offering a secondary source of outlook even if those openings would still enable the affected flats to benefit from secondary sources of light and cross-ventilation.

Internal daylight and sunlight

98. The applicants have tested the internal quality of accommodation in terms of how the flats perform against the BRE criteria for good levels of internal daylighting and sunlighting. The report submitted to address this aspect confirms that 90% of the rooms within the south block will meet the target Average Daylight Factor criteria. 85% of the rooms would achieve daylight distribution (NSL) to over 50% of their rooms areas, with this figure increasing to 99% when considering all the flat's living rooms and the studio flats.

99. In terms of the northern block, the report submitted confirms that 61% of the rooms will meet the target Average Daylight Factor criteria, although 100% of the living rooms in the block will meet the target. 48% of the rooms would achieve daylight distribution (NSL) to over 50% of their room areas, with this figure increasing to 100% when considering the living rooms alone.

100. In terms of sunlighting, 38% of the windows will meet the recommended criteria for winter sunlight and 20% for year round sunlight. This is largely because the south facing windows will directly overlook the taller southern block within the scheme, limiting these windows' access to the sun. This does have benefits in terms of limiting overheating.

101. Overall, the proposed development is considered to perform well against the recommended guidance and represents an acceptable level of compliance in consideration of the dense urban location of the scheme.

Amenity Space

102. Policy DMP19 states the following:

"All new dwellings will be required to have external private amenity space of a sufficient size and type to satisfy its proposed residents' needs. This will normally be expected to be 20sqm per flat and 50sqm for family housing (including ground floor flats)."

103. The policy requirement in relation to external private amenity space is for it to be "sufficiency of size". Whilst there is a normal "expectation" for 20qm per flat and 50sqm for family housing (including ground floor flats), that is not an absolute policy requirement in all cases. This is reinforced by the supporting text to the policy which provides that:

"10.39 New development should provide private amenity space to all dwellings, accessible from a main living room without level changes and planned within a building to take a maximum advantage of daylight and sunlight. Where sufficient private amenity space cannot be achieved to meet the full requirement of the policy, the remainder should be applied in the form of communal amenity space".

104. These requirements are carried forward in Brent's emerging Local Plan under policy heading BH13.
105. In meeting the above requirements, it is expected that at least a part of each flat's required amenity space will be private space and as such, all units should be provided with a London Plan/Housing SPG compliant balcony/terrace. Within dense developments in a town centre setting there is an expectation that a shortfall in amenity space provision can acceptably be made up through communal garden space as much as is possible, which would be a secondary form of amenity space beyond the flats' balconies.
106. All flats will be provided with a private amenity space, in the form of a good sized balcony that exceed London Plan standards for private amenity space provision.
107. The proposal includes rooftop terraces as communal amenity spaces for residents. The rooftop terrace amounts to a 235.8sqm outdoor space atop the northern block and two outdoor spaces atop each shoulder of the southern block measure 178sqm and 243.1sqm respectively. An 87.8sqm indoor communal lounge is provided at the ground floor of the northern block, overlooking the landscaped area to the east, as an additional amenity offer to residents; contributing towards the DMP19/BH13 standard for amenity spaces. The benefit of this indoor space is acknowledged and would factor into officers' views on the acceptability of the amenity space provisions.
108. Overall, the amenity space provision, and associated shortfalls below DMP19/BH13 (where relevant) is as follows (all in sqm)

Northern Block	P o l i c y Requirement	P r i v a t e Balcony	Shortfall of policy	Communal Spaces	Cumulative Shortfall	% of req
NW unit (x13)	20	7.4	12.6			
NE unit (x12)	20	7.4	12.6			
SW unit (x13)	20	7.9	12.1			
SE unit (x12)	20	7.9	12.1			
Total units (x50)	1000	382.5	617.5	323.6	293.9	70.6%

Southern Block	P o l i c y Requirement	P r i v a t e Balcony	Shortfall of policy	Communal Spaces	Cumulative Shortfall	% of req
NW edge unit (x17)	20	7.9	12.1			
NW central unit (x17)	20	7.9	12.1			
NE central unit (x14)	20	7.4	12.6			
NE edge unit (x14)	20	7.4	12.6			
SW edge unit (x17)	20	7.9	12.1			
SW central unit (x17)	20	7.9	12.1			
SE central unit (x14)	20	7.9	12.1			
SE edge unit (x14)	20	7.9	12.1			
Total units (x124)	2480	965.6	1514.4	421.1	1,093.3	55.9%

W h o l e scheme	P o l i c y Requirement	P r i v a t e Balcony	Shortfall of policy	Communal Spaces	Cumulative Shortfall	% of req
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Total units (x174)	3480	1348.1	2131.9	744.7	1,387.2	60.1%
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109. Whilst the tables above break down the shortfall in amenity space provision against policy requirements across the different amenity space components by block, the summary position is that:

110. 39% of the required amenity space provision is achieved through the provision of private balconies – this figure is also the same for the north and south blocks individually

- 60% of the required amenity space provision is achieved through the provision of private spaces and communal spaces – this figure is 71% for the north block and 56% for the south block
- The development falls short of DMP19/BH13 standards by 40% for amenity space provision. It is considered that amenity space provision has been reasonably maximised across the development, utilising all rooftops where possible, and it is therefore considered that such a shortfall should be accepted given that the wider benefits of the scheme and that the development proposal is within a site allocated for residential development and sits within a town centre setting. The very near proximity of this development to the emerging Northern Lawns and Southern Terraces parks being delivered as part of the Wembley Park Masterplan is acknowledged in accepting this amenity space provision as the maximum.

Play Space

111. Policy 3.6 of the adopted London Plan requires that on site play space is provided to service the expected child population of the development. These requirements are carried through within the emerging London Plan under policy heading S4. The applicants have set out a play space strategy which provides on-site play spaces aimed at children aged 0-4 in line with GLA's child yield matrix. The child yield matrix would require 101sqm of play space for 0-4 year old children in the north site and 103sqm of play space for 0-4 year old children in the south site. The applicants have incorporated these play spaces within the rooftop terraces and have provided 230sqm on the north site and 107.5sqm on the north site roof terrace. These figures are calculated based on the residential and affordable housing mix proposed and based on the local PTAL level and outer London setting. An additional 87.8sqm of internal play space is to be provided within the ground floor indoor communal area for the northern block, which potentially will provide a different, year round, all weather play offer alongside the external offer. The proposal would not incorporate play space for the 5-11 year group or the 11+ year group but identifies the proximity of the development to a number of parks (particularly the Northern Lawns and Southern Terraces being delivered as part of the Masterplan) in providing an off-site offer for residents. Given the constraints of the site, this approach is accepted by both officers at Brent and the GLA.

112. Nonetheless, the shortfall against policy is acknowledged and officers have secured a contribution from the developer (amounting to £5,000) to fund the supply, installation and maintenance of knockabout goal posts for informal play within Chalk Hill Open Space / St David's Open Space. This would be secured through the Section 106 agreement. This would provide an alternative play offer for older children.

113. Whilst shortfalls are present in the older age groups' provision, it is noted that the northern site is providing 0-4 play space significantly in excess of the child yield requirements and a replacement of some of the excess 0-4 play space within play space for older children would be required.

114. Detailed plans of the play spaces and their individual features will be secured through a landscaping condition. The landscaping condition will require that details of the reallocation of a suitable amount of play space for those within older age groups is undertaken and shown on the plans.

Landscaping provision and Urban Greening

115. The applicant proposes a comprehensive landscaping strategy, seeking to implement landscaping and tree planting to the east of both blocks, on a site which has minimal landscaping value at present. The offer to the east of the northern block will be more extensive given the more spacious location adjacent to the landscaped areas forming part of the 10-11 Watkin Road development.

116. This northern landscaped area, alongside that of the adjoining landscaped area within the demise of 10-11 Watkin Road could potentially help establish a future public access connection to the Wealdstone Brook which it immediately adjoins, which would be in keeping with the aspirations of WAAP policy

WEM40 which requires that development of sites adjacent to the Wealdstone Brook should undertake the opportunities to provide amenity space, improve biodiversity, public access, and semi naturalisation. Further proposals that contribute to this policy aspiration will be provided in the form of biodiversity measures which are discussed later in this report.

117. As a result of the landscaping proposals, the applicant's urban greening factor (UGF) compared to the existing is 0.42, which is compliant with London Plan policy G5, which seeks a UGF of at least 0.4 for predominantly residential developments. The Urban Greening factor has been achieved through the greening of the site through both roof terraces and ground floor public realm.
118. Detailed plans of the landscaping's individual features will be secured through a landscaping condition. The condition will require the applicant to ensure that the public realm is closely coordinated with the public realm being delivered as part of the 10-11 Watkin Road development.

Transport and Highways

119. The proposed site is located at the junction of Watkin Road with Fulton Road, the existing car parking is accessed from Watkin Road, a cul-de-sac with a turning head at the eastern end, although currently illegal parking is a regular occurrence which prohibits service vehicles from turning around. The southern side of Watkin Road has a single yellow line preventing parking on Wembley Event Days whilst the northern side has double yellow lines, although, again, these are currently regularly ignored. Parking for the industrial uses along Watkin Road often results in vehicles obstructing the footway. Fulton Road has Double yellow lines on the southern side whilst the northern side has double yellow lines associated with the junction of Watkin Road and single yellow lines restricting parking on Wembley Stadium Event Days.

120. The site is not currently in a controlled parking zone. It is in the Wembley Stadium Event Day parking restriction zone in which parking is restricted to permit holders from 10am to midnight on event days. The site has a Public Transport Accessibility Level (PTAL) of 4, which is moderate.

Car Parking

121. The site is located within the Wembley Growth area and Wembley Area Action Plan sets out the parking standards for this area. Based on the PTAL being 4, the maximum car parking allowable is 0.4 spaces for 1 & 2 bedroom units and 0.6 spaces for 3 bedroom units, which would give a total maximum provision of 74.8 spaces.

122. No parking except for disabled parking is proposed to be provided. As the site is in an area with a PTAL of 4, this would accord with DMP policy 12 which states car free development should be considered in areas with a PTAL of 4 or above. Furthermore it is proposed to implement a CPZ within the area (for which S106 funding would be requested) which, in addition to an obligation which prevents residents (and businesses) from obtaining parking permits, would provide further mitigation. However, it is also considered that the proposal would require the provision and promotion of alternative modes in order to make this level acceptable.

123. In satisfying this, the applicants have agreed to contribute £87,000 towards the consultation and implementation of a Controlled Parking Zone. A S106 obligation will also prevent residents from obtaining parking permits, for existing and future controlled parking zones.

Disabled Parking

124. Four disabled spaces are proposed and these are to be located through in-set bays on either side of Watkin Road. This will be at a level slightly below the 3% required in the emerging revisions to the London Plan, with 5 spaces needed in order to be compliant with this.

125. Prior to submission, the applicants attempted to resolve this by suggesting alternative arrangements, but these resulted in other concerns including their impacts on the streetscape and highway safety. On balance, a deficiency of 1 disabled car parking space is thus considered acceptable. TfL also accept the deficiency of 1 disabled car parking in this instance, noting the constraints of the site, in particular the lack of a viability for basement construction given the flood risk level of the site.

126. The disabled car parking spaces are also some distance from the ramped access to the southern block and 65m to the main entrance doors. Fifty metres from the parking space to the main entrance doors is

the maximum recommended distance for disabled car parking. However, the applicants have incorporated resting space in between the car parking and entrance for the northern block and have incorporated an internal platform lift adjacent to the parking bays for the southern block to significantly reduce this distance. This results in an acceptable arrangement as the Lifetime Homes Guidance for Professionals Criterion 2 states "On large developments communal parking should be within 50 metres of the relevant communal entrance or (in the case of underground parking) the lift core. If a distance in excess of 50 metres cannot be avoided, level resting areas should be provided along the route." Whilst Criterion 3 states 1:20 for a distance of 10 metres is an acceptable gradient" and the slope to and from the entrance is split into 10m long sections each with a gradient of 1:21. Therefore with the provision of resting spaces as shown on the plans for the northern block and the platform lift solution for the southern block, the proposed disabled car parking spaces would comply with the distance requirements.

127. In line with comments raised by TfL, a condition will be applied to secure one of the parking spaces with active Electric Vehicle Charging Point (EVCP) provision and the other three with passive EVCP provision. The provision of EVCP in this way would achieve the requirements of the draft London Plan which seeks for 20% of car parking spaces to be provide with active EVCP and for 80% of car parking spaces to be provided with passive EVCP. The EVCP infrastructure should not unreasonably impede pedestrian flows and the condition will secure the submission of details to confirm this arrangement.

128. TfL also sought clarification in relation to whether the proposal will provide safe and direct step-free access between Watkin Road with North End Road and the Wealdstone Brook. The applicant has demonstrated that there will be a step free access across Watkin Road to both parts of the site as they will be delivering a pedestrian crossing across Watkin Road with dropped kerbs and tactile paving. This will be secured within the S278 works. The applicants clarify that there is an aspiration to create a step free route between Watkin Road and North End Road but this is outside of the scope of this application and will need to be safeguarded as part of the adjoining site when it comes forward for redevelopment.

Cycle Parking

129. The proposal requires a minimum of 299 residential cycle parking spaces, based upon the draft London Plan standards. These should be split between the two blocks, with the northern block providing 91 spaces and the southern block providing 208 spaces. Both blocks meet the minimum number of spaces and this is welcomed.

130. The northern building proposes 88 spaces comprised of two tier stands with 450mm spacings and 4 accessible cycle parking spaces resulting in a total provision of 92, 1 more than the minimum requirement set out above. The southern building proposes 202 standard cycle parking spaces with 142 of the stands having 450mm spacings and 60 of the stands having 400mm spacings. In addition, 6 accessible cycle parking spaces are proposed. This arrangement is accepted. A condition is to be applied to secure the provision of the long stay residential cycle parking.

131. Both cycle stores are proposed to be located within the first floor, accessed via lifts. The lifts that provide access to the cycle stores have internal dimensions of 1.2m x 2.3m and therefore comply with the London Cycle Design Standards (LCDS) requirements.

132. Out of the proposed 300 cycle stands, 10 are proposed to be capable of accommodating adaptable cycles such as tricycles and this is welcomed and the doors leading up to the cycle stores are confirmed to be large enough to accommodate these cycles.

133. With regards to long-stay cycle parking for the commercial B1c uses, the plans indicate that 5 spaces would be provided plans indicate that these will be located within the ground floor. However, detail is lacking and revisions to the arrangement would be required through condition.

134. Details of the cycle store for the 58sqm B1a use are proposed to be detailed at a later stage and would only require the provision of 1 space. A condition will require that such details are provided and implemented prior to occupation.

135. Two Sheffield stands have been provided in a suitable location outside of the South block for short stay / visitor needs. This will provide capacity for four cycles and is in line with the draft London Plan standards.

Refuse Management

136. For the northern block a minimum capacity of 12,960l is required, split evenly between recyclable waste

and residual waste. The proposal includes 12 x 1,100l Euro bins and 5 x 240l bins which is sufficient to meet minimum requirements, along with the provision to provide storage for organic waste which is welcomed. The doors to the refuse store would open inwards and would therefore not obstruct the highway.

137. For the southern block a minimum capacity of 22,230l is required and 20 x 1,100l Eurobins are to be provided to meet this requirement, along with 11 x 140l bins to cater for organic waste which is welcomed. The proposed access to the store from the street is via the access to the commercial refuse and it is welcomed that two separate entrances for the commercial and residential refuse stores respectively is proposed, as the commercial uses may not utilise the Council's refuse operatives. The doors to these refuse stores would also open inwards and would therefore not obstruct the highway.

138. A condition would secure the provision of the refuse storage prior to occupation.

139. The substation doors on the Fulton Road side of the southern block open out onto the highway and these cannot obstruct the highway and will need to open inwards. A condition will require that this is adhered to, or that a suitably robust justification is submitted and approved for the doors to acceptably open outwards.

Delivery and Servicing

140. The proposal involves the creation of a 10m long, 2.5m wide in-set loading bay in the location of the existing adopted footway. This would involve the creation of an extra 2m of footway to the rear, which would need to be adopted through a S38 Agreement. A consistent width of at least 2m for the footway around the entire site frontages is required, which will also require the adoption of a sliver of land on the inside of the bend in Watkin Road fronting the southern building. TfL have also confirmed that they are satisfied with this arrangement.

141. Appendix 1 of the Transport Note indicates that the bay is 3m wide whilst appendix 4 includes tracking diagrams which indicate that a 9.2m refuse vehicle and an 8.1m box van are able to turn around in the turning head at the eastern end of Watkin Road, which is acceptable. Whilst the turning head area is often blocked with parked cars at present, the turning head is adopted highway and is double yellow-lined for its full extent. As a result, were any issues to be reported to the highways team, suitable enforcement could be undertaken.

142. TRICS data for servicing indicates that the servicing bay will be used by 25 delivery and servicing vehicles per day. If, for example, this was carried out over a 12 hour period from 8am to 8pm this would equate to a vehicle arriving on average approximately every 30 minutes. This would be a reasonably acceptable level of usage, but to ensure service vehicles don't arrive at the same time, a Delivery & Servicing Management Plan would need to be produced. Furthermore, with regards to residential deliveries, it is welcomed that the submission indicates that there will be a storage facility for residential deliveries which is welcomed.

143. The submission and approval of a delivery and servicing management plan will be required by condition. TfL would like the applicant to demonstrate how the adopted footways will be protected and how arrangements can be made for safe and efficient operations without detrimental impact on pedestrians, including access between the layby and the more distant building (north block). The condition will include wording to secure these details.

144. Furthermore, a S106 obligation will require that a S38/278 Agreement is entered into to enable the construction of loading and disabled bays in the footways of Watkin Road and the reinstatement of all redundant vehicle crossovers to footway. The S38/278 agreement will also need to secure the Council's adoption of land along the site frontage in order to maintain an unobstructed footway width of 2m along the site frontages.

Construction Logistics

145. The proposals would require the submission of a Construction Logistics Plan. As most of the land would be taken up by buildings, the construction would be constrained and the impacts of this on the highway would need to be carefully managed. A dialogue would need to be opened up in order to agree the most suitable arrangements.

146. The submission includes information that construction vehicles for the southern block would be

positioned on the northern side of Fulton Road, whilst construction vehicles for the northern block would be positioned on the northern side of Watkin Road, the latter may require the controlled reversing out of construction vehicles if the turning head continues to be obstructed. These arrangements are in principle acceptable subject to further information to be submitted in a Construction Logistics Plan which would be conditioned.

147. Given the concerns raised by objectors, it will be important that the Construction Logistics Plan includes details of co-ordination arrangements with other developments in the area to minimise the cumulative impacts on local residents and business operations. This requirement has also been raised by TfL. The condition will be worded so as to include this.

Travel Plan

148. A Travel Plan has been submitted which is positive but has some shortcomings, notably it would need to be confirmed that the applicants will fund membership of a car club for residents for a three year period and a budget will need to be indicated for some of the suggestions in the travel plan, including the provision of Dr Bike sessions and establishment of a cycle user group and pedestrian group.

149. Once the travel plan incorporates these aspects it would not just provide information to residents but would also provide incentives to residents to take up sustainable travel modes. A revised Travel Plan would need to be secured via a Section 106 and it would be acceptable for any outstanding issues to be addressed through this.

Healthy Streets Assessment

150. The applicants have included an assessment of an active travel zone to local trip generators such as bus stops, rail stations and schools. It concluded that the focus of attention should be around the following locations:-

151. North End Road pedestrian access to Bridge Road via steps and ramp;
i) Fulton Road (between junctions with Albion Road and Rutherford Way);
ii) A4089 / Wembley Hill Road / Clarendon Gardens signal controlled junction; and
iii) Entrance to Wembley Town Centre, from Wembley Stadium station (effectively Wembley Triangle).

iv) In response:-

152. There is a plan for North End Road to create a new road link to Bridge Road which would have associated footways and so this would resolve this concern.

- i) Fulton Road junction with Albion Way is likely to be more problematic in the future as this would be where traffic from the new link road will begin to disperse. As this is in close proximity to the site, it would be appropriate for mitigation measures to be introduced here.
- ii) The Wembley Hill Road junction with Clarendon Gardens, Wembley Park Road and Park Lane would be too far from this site and closer areas should be prioritised.
- iii) The Wembley Triangle is a known concern with Council in promoting Active Travel. In particular, the Council is seeking to provide a safe cycle crossing from Harrow Road onto the White Horse Bridge and plans are in development. It is a likely point for residents to access the facilities of Wembley Town Centre and improvements could be justified.

iv) Based on the above, it is considered that improvements to the Fulton Road junction with Albion Way would be the most pertinent to the development and the implementation of a zebra crossing with raised table set back about 10 metres from the give way line would be officers' preferred way of improving this. A Section 106 sum of £10,000 has been offered by the applicant to carry out works to improve pedestrian facility across Albion Way. The amount offered would be in line with the expected cost of providing a zebra crossing with a raised table in this location and is therefore accepted. TfL have also confirmed that they are satisfied with this improvement project and the contribution amount in mitigating this aspect. The Section 106 agreement will incorporate this contribution.

Transport Impact

153. The applicants have submitted a transport assessment, which has used comparable schemes in the TRICS database to generate a model of the numbers of likely journeys that would be created by this development across different transport modes.

154. The transport assessment shows that the proposed 174 residential units could generate 84 and 73 two-way person trips in the morning and evening peak hour respectively. In terms of train/tube trips specifically the equivalent figures would be 36 and 31, in terms of bus/coach trips the equivalent figures would be 17 and 17 whilst in terms of car/van use the equivalent figures would be 4 and 4.
155. TfL have requested that the comparable sites used to establish the trip rates are amended to reflect more appropriate sites. Three new sites were used to generate revised trip rates which were acceptable to officers at TfL. Based on the revised trip rate analysis, TfL have requested £175,667 to ensure the impact on Wembley's bus network can be effectively mitigated by this development. A Section 106 obligation will secure this payment.

Energy and Sustainability

Carbon Savings

156. The applicant has included an Energy and Sustainability Statement. Policy 5.2 of the adopted London Plan and draft policy SI 2 of the Intend to publish London Plan require major developments to achieve carbon savings beyond the requirements of Building Regulations. These are referred to as 'be lean' (fabric efficiency), 'be clean' (clean source of energy supply) and 'be green' measures (use of renewable energy technologies). A zero carbon development is ideal, however the policies acknowledge the practical difficulties of this and allow for a minimum of 35% improvement beyond minimum Building Regulations requirements with the remaining regulated carbon emissions being financially offset instead. Policy SI 2 stipulates that at least 10 points of the 35 point minimum saving must be from 'be lean' for the domestic part of the development whilst at least 15 points of the 35 point minimum must be from 'be lean' for the non-domestic workspace part of the development.
157. Within the residential component of the scheme, the proposed regulated development with 'Be Lean', 'Be Clean' and 'Be Green' measures incorporated is projected to emit 98.4 regulated tonnes of Carbon Dioxide per annum, which is down from a baseline emission of 163.89 tonnes per annum. This equates to a 39.96% (with 10.46% attributable to 'be lean') reduction on the minimum building regulations (2013), in excess of the requirement within the London Plan, although does not achieve the zero carbon goal and as such requires an offset payment. The offset payment shall cover a 30 year period of emissions, with the payment being equivalent to £60 per tonne per annum. This payment will be secured through a legal agreement to any forthcoming consent. With the modelling provided, a payment of £177,120 would be secured for this purpose.
158. Within the commercial component of the scheme, the proposed regulated development with 'Be Lean', 'Be Clean' and 'Be Green' measures incorporated is confirmed to emit 26.03 regulated tonnes of Carbon Dioxide per annum, which is down from a baseline emission of 41.96 tonnes per annum. This equates to a 37.97% reduction (with 18.69% attributable to 'be lean') on the minimum building regulations (2013), in excess of the requirement within the London Plan, although does not achieve the zero carbon goal and as such requires an offset payment. The offset payment shall cover a 30 year period of emissions, with the payment being equivalent to £60 per tonne per annum. This payment will be secured through a legal agreement to any forthcoming consent. With the modelling provided, a payment of £46,854 would be secured for this purpose.

159. The details of the carbon savings measures are as follows:

Be Lean

(total savings from 'be lean' in residential element: 17.15 tonnes / 10.46%)
(total savings from 'be lean' in commercial element: 7.84 tonnes / 18.69%)

160. Insulation improvement to external walls, exposed floors, exposed roofs, glazing and air permeability
- Shading to double glazing to limit solar gains
 - Mechanical ventilation with heat recovery
 - Energy efficient lighting
 - The provision of time and temperature control
 - Improved specific fan powers

Be Clean

(total savings from 'be clean' in residential element: 0 tonnes / 0%)

(total savings from 'be clean' in commercial element: 0 tonnes / 0%)

- No measures

Be Green

(total savings from 'be green' in residential element: 48.33 tonnes / 29.49%)

(total savings from 'be green' in commercial element: 8.09 tonnes / 19.28%)

- Use of air source heat pumps to provide heating and hot water to the residential element and heating and cooling to the commercial element.
- The GLA has reviewed the carbon savings energy strategy. The approach to energy is generally supported, however the GLA consider that further information should be provided to justify the applicant's proposal to not incorporate roof solar panels as part of the 'be green' savings. Brent officers would note that the roofs are fully utilised at present, mostly for amenity space but with smaller sections of ancillary plant. The GLA also request that further detail is provided on how the site will be future proofed to connect to a district heating network, should one come forward in the future. In relation to this, Brent would note that WAAP policy WEM 30 requires all Wembley development to incorporate a future connection point into the build and such details will be required by condition in addressing this. These aspects will need to be picked up by the applicant's energy consultant ahead of a Stage 2 referral to the GLA.

BREEAM

161. Brent's adopted CP19 policy and draft BSUI1 policy require all major non-residential development (i.e. non-residential floor space in excess of 1,000sqm) to achieve a BREEAM standard of 'Excellent'. The proposal contains 998sqm of non-residential floor space and therefore is not subject to this policy requirement.

Environmental Health

Air Quality

162. An air quality assessment considering the impacts of the proposed redevelopment of the site on air quality has been submitted. The development sits within one of London's air quality management areas and the requirements of adopted London Plan policy 7.14 are relevant, requiring major developments to be at least 'air quality neutral' in such areas.

163. The submitted report has considered the impacts that would be incurred during the construction phase and during the operational phase.

164. Under best practice guidance, the proposed development's risk for construction dust and dust generation is considered to be 'not significant'. A series of mitigation measures are proposed which would form part of the construction management plan for the development.

165. The air quality report includes an air quality neutral assessment which concludes that the building emissions from the proposed development are within the benchmarked emissions, fully meeting air quality neutral requirements.

166. The methodology set out in the air quality report will be secured by condition.

Noise and Vibration Impact

167. The applicants to undertaken a noise survey and submitted this along with an acoustic design statement. A detailed environmental noise survey has been undertaken in order to establish the currently prevailing environmental noise climate around the site. The environmental noise impact upon the proposed dwellings has been assessed in the context of national and local planning policies. Appropriate target noise levels have been proposed and are achievable through conventional mitigation measures (i.e. double glazed windows). The assessment shows the site, subject to appropriate mitigation measures as detailed in the report, is suitable for residential development in terms of noise.

A condition will be applied requiring the development to be implemented in accordance with the details of the

noise survey and acoustic design statement and for evidence of the mitigation measures implementation to be submitted.

Construction Management

The development is within an Air Quality Management Area and located very close to residential premises. Demolition and construction therefore has the potential to contribute to background air pollution levels and cause nuisance to neighbours. The applicant will need to submit a construction management plan to set out how external environmental impacts from construction processes will be minimised. This will be secured by condition. Furthermore, a condition governing the need for non-road mobile machinery to meet reasonable emission limits is also recommended to be applied to the decision.

Contaminated Land

168. The site has a history of non-residential and industrial uses, as such it is possible that the soil below the site is contaminated. A geo-technical assessment of land contamination at the site has been submitted with the application. Conditions are recommended requiring an investigation of land contamination to be carried out following demolition of the buildings on site. The findings will need to be submitted to the Council through a condition. Based on the findings, a remediation strategy may be necessary and a condition will require that the means of remediation are demonstrated.

Lighting

169. Any new lighting at the proposed site should be installed considering existing homes and buildings. The new development must not give rise to light or other nuisance to nearby residents. A condition will require that, should external lighting be installed, details of the lighting, including a measure of lux levels, is submitted and approved by the Council – this will be incorporated as part of the landscaping condition.

Microclimate

170. A microclimate assessment has been submitted by the applicant.

171. Initial wind tunnel testing was undertaken with the known large landscaping surrounding the site in place. A second wind tunnel testing was undertaken with the consented surrounds in place. Places tested included all thoroughfares, crossing points and the Wealdstone Brook access paths, on street parking bays, building entrances and rooftop garden spaces.

172. The initial wind tunnel testing shows that the safety criteria is met in all parts of the study area and the comfort criteria is largely met too. The places where conditions may exceed suitable comfort levels for very minor periods in winter only are the on-street blue-badge bays and the building entrances. To address the comfort at the parking bays, trees immediately adjacent to the location would need to be an evergreen variety with full leaf in winter. To address the comfort at the building entrances, side-screens could be placed either side of the entrances to act as a wind buffer for those entering and exiting the building. However, the applicant's microclimate consultant has since confirmed that changes undertaken during the application process have addressed the comfort level concerns at the building entrances and that mitigation is only required in relation to on-street blue badge bays. Specifically, the applicant's consultant has confirmed the following: *"the NW facing façade of S1 is now continuous (where before there was a step change just upwind of the entrance of concern) I'd expect conditions with just that recess to be acceptable, removing the need for any further treatment."*

173. The wind tunnel testing with the consented developments in situ showed a marginally improved wind environment at ground floor to meet the comfort criteria in all locations.

174. Other tested locations are acceptable and do not materially change between the existing surrounds and consented surrounds scenarios.

175. The condition requiring the submission of a landscaping plan will include a requirement for the evergreen species of trees adjacent to the parking bays to be shown, as well as side-screens to be shown, in meeting the mitigation measures set out in the submitted report.

Flooding and Drainage

176. Parts of both the north and south sites sit within flood zone 3a (high risk) (surface, fluvial and tidal) a

according to the Environment Agency's flood designations. A report addressing flood risks of the development has been submitted.

177. The flood mitigation measures proposed include the ground floor of the new buildings being raised above the maximum flood level + 35% through the stepped and ramped accesses, the basement to the southern block being fully watertight to this same height, the bin store being designed to flood in extreme events and additional measures such as flood resilient design, careful design of the structure to withstand flooding during extreme events and preparation of a flood response strategy to be adopted by residents and site management.
178. The GLA have reviewed this information and consider that further information in relation to the protection of surface water utilities and surface water flooding is needed to satisfy the relevant policies of 5.12 (adopted LP) and SI 12 (emerging LP). The GLA also identify a need for clarity on some of the flow paths which have been identified as well as an assessment of the standard of protection from surface water flooding afforded to the proposed commercial units is needed. Finally, additional information on proposed flood gates should also be provided. These matters will be addressed by the applicant in preparation of a Stage 2 referral to the Mayor.
179. In terms of measures to reduce surface water drainage rates at the site, green roofs and geo-cellular attenuation tanks (one below each block) with flow control devices are proposed. This would reduce the flow of surface water from the site down to 2 litres per second for the northern block and 5 litres per second for the southern block, similar to greenfield rates. The GLA have reviewed this information and consider that further information is needed on how higher priority SuDS measures will be included in the development and how the greenfield runoff rates will be achieved to satisfy the relevant policies of 5.13 (adopted LP) and SI 13 (emerging LP). These matters will be addressed by the applicant in preparation of a Stage 2 referral to the Mayor.
180. The sustainability statement submitted indicates that the proposed dwellings would be designed for a maximum indoor water consumption of 105 l/person/day in line which is an optional standard in Part G of the Building Regulations. The GLA have reviewed this information and consider that the submission generally meets the requirements of the relevant policies of 5.15 (adopted LP) and SI 5 (emerging LP). A condition will require that the water consumption target rate is achieved.
181. The Environment Agency (EA) have reviewed the proposal and support the content of the submitted flood risk assessment and drainage strategy. The EA have requested that a condition securing the implementation of this document is included within any consent. Furthermore, the EA have requested that an informative is applied to the decision notice relating to Environmental Permitting.
182. Thames Water have reviewed the proposal and do not raise any concerns from a construction perspective or an operational perspective in relation to surface water and foul water capacity.

Trees and Landscaping

- 183.** The applicant has submitted an arboricultural assessment which identifies that there are no trees on the site at present but that there are 9 existing trees close to the site boundary, forming part of the landscaped buffer with the Wealdstone Brook to the north of the site. The quality of these trees vary with three being category A trees, two category B, three category C and one category U. The applicant's tree constraints plan indicates that no major works would need to be carried out within the root protection areas of these trees and that the trees will therefore be retained as part of the proposal. The trees will be protected during the construction phase through the erection of protective fencing and the establishment of construction exclusion zones to prevent building works and materials compacting the soil to the detriment of the roots in these areas. A condition will require that this is adhered to.
184. Whilst there would be no tree losses as part of the proposal, the applicant is proposing street tree planting as part of the development. The applicant's submitted materials indicate that 16 additional trees would be planted within the application site. Twelve of these trees would be along Watkin Road itself whilst another four will be provided away from the street frontage within the landscaped ramp access area to the west of the northern block. As such, the proposal would see no loss of trees and a net gain of 16 trees.
185. Brent's tree and landscaping officers have reviewed the plans and welcomes the tree planting proposals. A condition will require that final detailed landscaping drawings are submitted, approved and

implemented prior to the occupation of the development.

Ecology and Biodiversity

186. The site is close to a Grade II Site in Nature Conservation (SINC) located alongside the Wealdstone Brook to the north of the site.

187. The applicants have submitted an ecology report and supplementary bat roosting survey which indicate the protected and priority species identified on or likely to be on or near the site.

188. The report addresses the likelihood of roosting or foraging animals including bats, terrestrial mammals, amphibians, reptiles, birds, invertebrates, white-clawed crayfish, dormice and polecats. Generally, the development is deemed unlikely to adversely affect these species, nonetheless a number of measures have been recommended to ensure any harm is minimised.

189. The report also considers the presence of invasive plant species, noting that butterfly-bush has been identified on site whilst cotoneaster sp. and Japanese Knotweed have been located alongside the brook corridor within 7 metres of the site.

190. In terms of ecologist recommendations, a construction ecological management plan (CEMP) should be compiled for the site. The aim of the CEMP would be to minimise the potential impact of the construction phase of the development on the existing ecology of the site and off-site receptors, and to ensure works proceed in accordance with current wildlife legislation. This should be agreed with the local planning authority prior to works commencing.

191. To protect habitat, it is recommended that any trees overhanging the site are protected. The retention of these trees and their protection from damage has been confirmed through the applicant's arboricultural impact assessment. The now withdrawn Environment Agency Pollution Prevention Guidelines are recommended to be adhered to throughout the works to ensure suitable habitat protection.

192. In terms of enhancements to biodiversity, recommendations are made to plant habitats which will be of value to wildlife, such as native seed/fruit bearing species to provide foraging habitat for mammals and birds and nectar rich species like honeysuckle to attract bees, butterflies and moths. Furthermore, nesting/roosting habitat should be provided, such as bird boxes for species such as house sparrow, dense scrub areas for species such as song thrush and bat boxes for species such as pipistrelle.

193. In order to comply with wildlife legislation and relevant planning policy, the following recommendations are made:

194. All recommendations with the applicant's submitted preliminary bat roost assessment to be followed.
- Vegetation and building clearance to be undertaken outside the nesting bird season (March-September). If this is not possible then any vegetation/buildings to be removed or disturbed should be checked by an experienced ecologist for nesting birds immediately prior to works commencing. If birds are found then works to be delayed through an appropriate buffer zone until the young have fledged and the nest has been abandoned naturally.
 - Excavations that need to be left overnight should be covered or fitted with mammal ramps to ensure any animals can enter and escape safely. Any open pipework with an outside diameter of greater than 120mm must be covered at the end of each work day to prevent animals from becoming trapped
 - In order to address the invasive plant species on and near the site, a method statement should be developed with reference to established best management practices for the treatment of the species.

195. The recommendations and enhancement suggestions are considered to be thorough and robust given the local ecological designations, and it is therefore considered that the scheme, subject to the above measures, would not result in any unduly harmful impact on the biodiversity in the area and may be of benefit to local ecology. A condition will require that the abovementioned recommendations and enhancements are submitted in plan form (in the case of the CEMP and invasive species method statement) for approval. The landscaping condition will also require that the biodiversity enhancement measures are shown within the submitted landscaping plans. An additional condition will require the remainder of the ecology protection and enhancement measures to be adhered to during implementation.

Fire Safety

196. Fire Safety is formally considered at Building Regulations stage, however the applicants have clarified a fire safety strategy within their planning submission as follows.

197. A sprinkler system will be provided throughout the development and within all apartments
- A single evacuation strategy to be in place for the commercial units at the base of the southern block
 - Unless advised by the Fire and Rescue Service, a stay-put evacuation strategy to be put in place for residential parts of both buildings, as these floors will be protected by fire resisting construction
 - Each building served by a firefighting staircase and natural smoke ventilation systems within the corridors
 - Commercial ground floor unit to be provided with direct access to outside whilst upper floor commercial unit to have firefighting staircase accessible
 - Initial occupancy calculations show that there is sufficient staircase capacity for the expected number of occupants
 - Disabled refuge point to be provided at all commercial floor levels – none for the residential floor levels due to the stay put strategy
 - If fire occurs in an apartment where occupant is disabled, they will be required to leave the apartment and await evacuation within the escape stair which is protected by fire resistant construction (minimum 60 minutes)
 - Wall and ceiling linings suitable for limiting spread
 - External walls, balconies, solar shading to achieve appropriate regulations and classifications
 - Firefighting shafts, staircase, lifts and lobby with rising fire main to be provided throughout
 - Basement to southern building to be ventilated
- The GLA has advised that the applicant's fire safety strategy should be adjusted ahead of an approval to confirm the materials to be used in meeting the requirements of Policy D12 'Fire Safety' within the intended to publish London Plan (2019). This will be confirmed either ahead of an approval or by means of a pre-commencement condition.

Basement Impact

198. A localised basement is proposed at the site below the eastern part of the southern block, which would be 4.5m deep below ground level. There are several surface and foul water sewers running through and around the site and these will need to be diverted around the building footprint. A 1.3m diameter Thames Water branch sewer runs east to west in close proximity to the proposed basement. Discussions between Thames Water and the applicant started pre-application regarding the construction of the basement next to the sewer and will need to continue beyond a grant of planning permission as the construction phase begins.

199. The basement is modest in size given the scale of the development and the proposal is not considered to contravene any requirements of Brent's Basement Supplementary Planning Document (2017).

Overheating

200. The applicants have submitted an overheating assessment which indicates that the proposed development would meet all relevant requirements in achieving a good thermal comfort performance for prospective residents.

201. The overheating performance has been achieved through passive design measures such as energy efficient lighting and appliances, improved building fabric, glazing with improved solar factors, external overhangs through balconies to shade lower flats as well as a combination of natural and mechanical ventilation aspects.

202. The GLA has reviewed this overheating report and notes that the glazing modelling assumes the presence of high performance opaque blinds. The GLA has requested that information is submitted to demonstrate that the blinds would not interfere with the effective opening area of windows. This will be addressed ahead of a Stage 2 referral.

Television and Radio Reception Impact

203. The National Planning Policy Framework (NPPF) (2019) states, at para 114, part b that "[Local Planning Authorities] should ensure that they have considered the possibility of the construction of new

buildings or other structures interfering with broadcast and electronic communications services”.

204. The applicants have submitted a Television and Radio Reception Impact assessment to consider the potential impacts that the development could have on local TV and radio signals. Three different signals have been assessed as follows:
205. Digital Terrestrial Television (DTT) – Due to the existing good coverage and the lack of low mounted antennas in any theoretical signal shadow zone, the Proposed Development is not expected to impact the reception of Freeview television services.
206. Digital Satellite Television – Freesat and Sky – The proposed development has the potential to cause interference to satellite television reception adjacent to the site, within 145 metres to the immediate north-northwest of the proposed southern block. However, as there are no low-level mounted satellite dishes located in this theoretical signal shadow area, no interference can occur.
207. VHF (FM) Radio – Radio signals are unlikely to be adversely impacted due to the existing good coverage in the survey area and the technology used to encode and decode radio signals.
208. Overall, no interference to existing TV and Radio signals is likely as a result of this development. Nonetheless, a Section 106 obligation will require the applicant to carry out a survey following completion of the development to clearly identify any interference that has been caused. The Section 106 obligation will also require that the applicant underwrites all mitigation required in addressing any interference identified.

Utilities

209. The applicants have submitted a report setting out the existing and required utilities / statutory services for the scheme, including clean water supply, sewer connection, gas, electric and internet. The details of the report are not considered to contravene any relevant planning policies.
210. The statutory services report indicates that fibre internet is proposed to be made available to all apartments, which would accord with the aims of emerging London Plan policy SI 6.

Equalities

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

Conclusion

212. Following the above discussion, officers consider that taking the development plan as a whole, the proposal is considered to accord with the development plan, and having regard to all material planning considerations, should be approved subject to conditions and completion of a Section 106 Agreement.
213. The development would provide a suitable and attractive built addition to the Wembley Park growth area in line with local policy allocation objectives. Whilst the development would slightly reduce the extent of the Wembley Stadium arch that would be visible from Chalkhill Park and incur some limited level of harm to the daylight and sunlight enjoyed at neighbouring properties, a balance has to be struck between different planning objectives, and the provision of a significant quantum of affordable workspace and a high number of new homes, with significantly more of those homes being secured as affordable units than the Council would deem viable is a significant planning benefit that carries significant weight. Whilst the scheme does fall short on external amenity space standards set out in Policy DMP19 and draft Policy BH13, the quality of accommodation is considered to be good and this would be mitigated through a financial contribution, and the wider benefits of the scheme including affordable housing, affordable workspace and significantly improved public realm. As such, the conflict with adopted and emerging policy is limited and would be outweighed by the wider benefits of redeveloping the site for affordable housing.
214. Following the above discussion, and weighing up all aspects of the proposal, officers consider that the proposal should be approved subject to conditions and a Section 106 obligation.

CIL DETAILS

This application is liable to pay **£4,884,531.74** * 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): 882 sq. m.

Total amount of floorspace on completion (G): 15285.29 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
(Brent) Dwelling houses	14266.95		13443.71	£200.00	£0.00	£4,009,106.61	£0.00
(Brent) Businesses and offices	60.41		56.92	£40.00	£0.00	£3,395.12	£0.00
(Brent) Businesses and light industry	957.93		902.66	£0.00	£0.00	£0.00	£0.00
(Mayoral) Dwelling houses	14266.95		13443.71	£0.00	£60.00	£0.00	£813,933.43
(Mayoral) Businesses and offices	60.41		56.92	£0.00	£60.00	£0.00	£3,446.41
(Mayoral) Businesses and light industry	957.93		902.66	£0.00	£60.00	£0.00	£54,650.17

BCIS figure for year in which the charging schedule took effect (Ic)	224	331
BCIS figure for year in which the planning permission was granted (Ip)	334	
TOTAL CHARGEABLE AMOUNT	£4,012,501.73	£872,030.01

*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 DECISION NOTICE



Brent

DRAFT NOTICE

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

DECISION NOTICE – APPROVAL

Application No: 20/0587

To: Mr Dominic Tombs
Jones Lang LaSalle Ltd
30 Warwick Street
London
W1B 5NH

I refer to your application dated **17/02/2020** proposing the following:

Demolition of existing buildings and erection of 1x part-20, part-17 storey building and 1x 14 storey building together containing 174 residential units; commercial floor space (B1a and B1c use class) on ground, first and second floors; car and cycle parking, refuse storage, amenity space and associated landscaping.

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

at **1,2,3 & 9 Watkin Road, Wembley, HA9 0NL**

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: 01/09/2020

Signature:

Gerry Ansell
Head of Planning and Development Services

Notes

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

DnStdG

SUMMARY OF REASONS FOR APPROVAL

- 1 The proposal is in general accordance with the following documents:

Adopted Policy

- The National Planning Policy Framework (2019)
- The London Plan (2016 – Consolidated with alterations since 2011)
- Brent's Core Strategy (2010)
- Brent's Development Management Policies (2016)
- Brent's Wembley Area Action Plan (2015)

Emerging Policy

- The Intend to Publish London Plan (2019)
- Brent's Local Plan (Reg 19 Version – 2019)

Supplementary Planning Guidance / Documents

- Mayor of London's Affordable Housing and Viability SPG (2017)
- Mayor of London's Housing SPG (2016)
- SPD1 Brent Design Guide (2018)
- Brent's Basements SPD (2017)

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

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

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

Plans

29096-WKR_A-E10-000 Existing Site Plan & Elevations A1 - A
29096-WKR_A-D10-000 Demolition Site Plan & Elevations A1 - A
29096-WKR_A-P01-000 Site Location Plan A1 - A
29096-WKR_A-P10-000 Site Plan A1 - A
29096-WKR_A-P10-001 Proposed Basement Plan A1 - B
29096-WKR_A-P10-002 Proposed Ground Floor Plan A1 - A B C D E F G H I
29096-WKR_A-P10-003 Proposed 1st Floor Plan A1 - B C E F G
29096-WKR_A-P10-004 Proposed 2nd Floor Plan A1 - B C
29096-WKR_A-P10-005 Proposed Typical Layout - TF1 A1 - B
29096-WKR_A-P10-006 Proposed Typical Layout - TF2 A1 - B
29096-WKR_A-P10-007 Proposed Typical Layout - TF3 A1 - A B
29096-WKR_A-P10-008 Proposed Typical Layout - TF4 A1 - B
29096-WKR_A-P10-009 Proposed Typical Layout - TF5 A1 - B
29096-WKR_A-P10-010 Proposed Typical Layout - TF6 A1 - B
29096-WKR_A-P10-011 Proposed 20th Floor Plan A1 - B
29096-WKR_A-P10-012 Proposed Roof Plan A1 - A B
29096-WKR_A-P10-020 Commercial Area Plans - South Block A3 - A
29096-WKR_A-P11-000 Proposed Sections A1 - A
29096-WKR_A-P12-000 Proposed Elevations S1.1 & N1.1 A1 - A
29096-WKR_A-P12-001 Proposed Elevations S1.2 & N1.2 A1 - A
29096-WKR_A-P12-002 Proposed Elevations S1.3 & N1.3 A1 - A

29096-WKR_A-P12-003 Proposed Elevations S1.4 & N1.4 A1 - B
29096-WKR_AS-S1 Accommodation Schedule Block S1 A3 - A
29096-WKR_AS-N1 Accommodation Schedule Block N1 A3 - A
29096-WKR_AS-TOTAL Accommodation Schedule - TOTAL A4 - A

Supporting documents

- Environmental Noise Survey and Acoustic Design Statement (prepared by Hann Tucker Associates, dated February 2020)
- Wind Microclimate Report (prepared by Arcaero, dated January 2020)
- Arboricultural Impact Assessment (prepared by Middlemarch Environmental, dated February 2020)
- Preliminary Ecological Appraisal (prepared by Middlemarch Environmental, dated February 2020)
- Air Quality Assessment (prepared by Air Quality Consultants, dated January 2020)
- Flood Risk Assessment and Drainage Strategy (prepared by Whitby Wood, dated February 2020)

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

- 3 The scheme hereby approved shall contain 174 residential units as detailed in the drawings hereby approved, unless other agreed in writing by the Local Planning Authority.

Reason: In the interests of proper planning.

- 4 The development hereby approved shall contain 58sqm of commercial floor space which shall not be used other than for purposes within Use Class B1(a) (Class E(g)(i) from September 2020) and 940sqm of commercial floor space which shall not be used other than for purposes within Use Class B1(c) (Class E(g)(iii) from September 2020), as detailed in the drawings hereby approved, unless other agreed in writing by the Local Planning Authority, notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 (as amended) (or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification) and the Town and Country Planning (General Permitted Development) Order 2015 (as amended) (or any order revoking and re-enacting that Order with or without modification).

Reason: In the interests of proper planning and to ensure the adequate provision of workspace, employment floorspace and industrial capacity within the borough.

- 5 The following windows are to be constructed with obscure glazing and shall not include openings below a height of 1.7m as measured from the floor level of the room which the respective windows serve:

- All windows within the south-eastern flank elevation of the northernmost approved building between the 2nd floor and 13th floor (inclusive).
- The southernmost window within the north-western flank elevation of the northernmost building between the 1st and 13th floor (inclusive).
- All windows within the south-eastern flank elevation of the southernmost approved building between the 3rd and 16th floors (inclusive).

All abovementioned windows shall be maintained to this specification for the lifetime of the development, unless alternative details are first approved in writing by the Local Planning Authority.

Reason: To protect the privacy of residents at the emerging development at 10-11 Watkin Road and so as not to impose unreasonable constraints on development potential at units 4 and 8 Watkin Road.

- 6 The development hereby approved should be built so that 10% of the residential units achieve Building Regulations requirement M4(3) – ‘wheelchair user dwellings’ and the remaining to be built in accordance to M4(2) – ‘accessible and adaptable dwellings’, unless the units are laid out as 1 bed 1 person units which will achieve M4(1) visitable dwellings.

Reason: To ensure that the development achieves an inclusive design in accordance with London Plan Policy 3.8.

- 7 The approved refuse storage facilities shall be installed prior to occupation of the development hereby approved and thereafter retained and maintained for the life of the development and not used other than for purposes ancillary to the occupation of the building hereby approved, unless alternative details are agreed in writing by the Local Planning Authority.

Reason: To ensure that the development is fit for purpose.

- 8 The blue badge car parking bays delivered along Watkin Road as part of the Section 106 obligations for the development shall be made available for use prior to the first use of the development hereby approved and thereafter retained and maintained for the life of the development and not used other than for purposes ancillary to the occupation of the building hereby approved, unless alternative details are agreed in writing by the Local Planning Authority.

Reason: To ensure that the development is fit for purpose.

- 9 The development hereby approved shall be designed so that mains water consumption does not exceed a target of 105 litres or less per person per day, using a fittings-based approach to determine the water consumption of the development in accordance with requirement G2 of Schedule 1 to the Building Regulations 2010.

Reason: In order to ensure a sustainable development by minimising water consumption.

- 10 A communal television aerial and satellite dish system for each building shall be provided, linking to all residential units within that building unless otherwise agreed in writing by the local planning authority. No further television aerial or satellite dishes shall be erected on the premises.

Reason: In the interests of the visual appearance of the development in particular and the locality in general.

- 11 The residential units hereby approved shall at no time be converted from use class C3 residential to a use class 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 equivalent provision in 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 and in view of the restricted space within the site to accommodate additional bin or cycle storage.

- 12 All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA’s supplementary planning guidance “Control of Dust and Emissions During Construction and Demolition” dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up to date list of all NRMM used during the

demolition, site preparation and construction phases of the development on the online register at <https://nrmm.london/>.

Reason: To protect local amenity and air quality in accordance with Brent Policy EP3 and London Plan policies 5.3 and 7.14.

- 13 All doors serving substations/plant rooms from the public realm or public highways shall not open outwards unless details are submitted to and approved in writing by the Local Planning Authority that robustly justify, to the satisfaction of Brent's highways officers, that outward opening doors in these locations are necessary.

Reason: To protect the public highways and public realm from obstructions, in the interests of highway safety.

- 14 Unless alternative details are first agreed in writing by the Local Planning Authority, in consultation with the Environment Agency, the development shall be carried out in accordance with the submitted Flood Risk Assessment (produced by JM Enviro Limited, on behalf of Whitby Wood, dated February 2020, reference JME212.WatkinRoad.FRA_FINAL_REV A) and the following mitigation measures it details:

- Finished flood levels shall be set no lower than 31.7m above Ordnance Datum (mAOD) as stated in Table 5.3 page 35.
- Compensatory storage shall be provided through the construction of voids under the building, providing an overall increase of flood storage compensation of 7.6m³, as stated in Table 1 in Appendix H.
- Provision of compensatory flood storage through the incorporation of voids around the entire perimeter of the building with the underside of the void set no lower than 30.35m above Ordnance Datum (mAOD), as stated in Table 1 in Appendix H. Voids to be at least 1m wide every 5m on all sides of the building. There shall be no hard landscaping immediately in front of the void openings.
- Excavation of the flood storage compensation area is complete before development/infilling commences to ensure that floodplain capacity is maintained during construction of the development.
- Undercroft void spaces and openings shall remain open, free and maintained from all blockages, debris and storage in perpetuity for the life time of the development. The undercroft area will not be used for any storage facilities. Any walls or fencing constructed within or around the site shall be designed to be permeable to flood water.
- The existing flood defences show in Figure 3.4 page 18 shall be maintained as outlined in Table 5.3 page 35.

These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

Reason: This condition is required to:

- Reduce the risk of flooding to the proposed development and future occupants.
- Prevent flooding elsewhere by ensuring that compensatory storage of flood water is provided.
- Ensure the structural integrity of the existing flood defences thereby reducing the risk of flooding.

- 15 Unless alternative details are first agreed in writing by the Local Planning Authority, the recommendations set out in the submitted Air Quality Assessment (prepared by Air Quality Consultants, dated January 2020) shall be fully implemented following the commencement of the development.

Reason: To ensure the development suitably addresses air quality impact.

- 16 Unless alternative details are first agreed in writing by the Local Planning Authority, the ecology mitigation and enhancement recommendations set out in the submitted Preliminary Ecological Appraisal (prepared by Middlemarch Environmental, dated February 2020) shall be fully implemented following the commencement of the development.

Reason: To ensure the development suitably mitigates ecological impact and takes the opportunities to enhance ecology and biodiversity.

- 17 Unless alternative details are first agreed in writing by the Local Planning Authority, the tree protection recommendations set out in the submitted Arboricultural Impact Assessment (prepared by Middlemarch Environmental, dated February 2020) shall be fully implemented following the commencement of the development.

Reason: To ensure the development suitably protects trees that could be damaged by the development.

- 18 Prior to commencement of the development hereby approved, a construction logistics plan shall be submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plans shall include details of how construction would be co-ordinated with the construction operations of other developments in the area, so as to minimise the cumulative impacts on local residents and businesses. The development shall thereafter operate in accordance with the approved construction logistics plan.

Reason: To ensure the development is constructed in an acceptable manner.

Pre-commencement Reason: The condition relates to details of construction, which need to be known before commencement of that construction.

- 19 Prior to the commencement of the development a Construction Environmental Method Statement shall be submitted to and agreed in writing by the Local Planning Authority outlining measures that will be taken to control dust, noise and other environmental impacts of the development. The development shall thereafter operate in accordance with the approved document.

Reason: To ensure an acceptable impact on the surrounding environment during construction.

Pre-commencement Reason: The impacts being controlled through this condition may arise during the construction phases and therefore need to be understood and agreed prior to works commencing.

- 20 Prior to the commencement of the development a Construction Ecological Management Plan shall be submitted to and approved in writing by the Local Planning Authority outlining measures that will be taken to minimise the potential impact of the construction phase of the development on the existing ecology of the site and off-site receptors, and to ensure works proceed in accordance with current wildlife legislation. The development shall thereafter operate in accordance with the approved document.

Reason: To ensure an acceptable impact on the surrounding environment during construction.

Pre-commencement Reason: The impacts being controlled through this condition may arise during the construction phases and therefore need to be understood and agreed prior to works commencing.

- 21 Prior to the commencement of the development an Invasive Species Method Statement shall be submitted to and approved in writing by the Local Planning Authority outlining measures that will be taken to address invasive species on site with reference to established best management

practices for the treatment of the species. The development shall thereafter operate in accordance with the approved document.

Reason: To ensure an acceptable impact on the surrounding environment during construction.

Pre-commencement Reason: The impacts being controlled through this condition may arise during the construction phases and therefore need to be understood and agreed prior to works commencing.

- 22 Prior to the commencement of the development, a revised Fire Safety Strategy shall be submitted to and approved in writing by the Local Planning Authority. The revised Fire Safety Strategy shall confirm details of the specific materials to be used in the construction of the development that will ensure a fire resistant development. The revised Fire Safety Strategy shall be implemented in full following commencement of the development.

Reason: To ensure that the development has thoroughly considered fire safety at the planning stage, in line with the requirements of policy D12 in the Intend to Publish London Plan.

Pre-commencement Reason: The impacts being controlled through this condition may arise during the construction phases and therefore need to be understood and agreed prior to works commencing.

- 23 a) Prior to the commencement of the development (excluding demolition), a site investigation shall be carried out by competent persons to determine the nature and extent of any soil contamination present. The investigation shall be carried out in accordance with the principles of BS 10175:2011. A report shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of construction works that includes the results of any research and analysis undertaken as well as an assessment of the risks posed by any identified contamination. It shall include an appraisal of remediation options should any contamination be found that presents an unacceptable risk to any identified receptors. Vapour monitoring shall be undertaken as part of the assessment.

b) Any soil contamination remediation measures required by the Local Planning Authority shall be carried out in full. A verification report shall be submitted to and approved in writing by the Local Planning Authority, stating that remediation has been carried out in accordance with the approved remediation scheme and the site is suitable for end use (unless the Planning Authority has previously confirmed that no remediation measures are required). The remediation works shall be carried out in full prior to first occupation of the development hereby approved.

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

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

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

- 25 Prior to commencement of the development, excluding demolition and site clearance, a plan indicating the provision of electric vehicle charging points for the approved car parking spaces within the site shall be submitted to and approved in writing by the Local Planning Authority. The charging points shall be designed so as not to unreasonably impede pedestrian movement on Watkin Road. Thereafter, the agreed electric vehicle charging points shall be provided and made available for use. The provision of electric vehicle charging points shall be in accordance with adopted London Plan standards, providing at least both active and passive charging points.

Reason: To encourage the uptake of electric vehicles as part of the aims of the adopted London

Plan policy 6.13.

- 26 Prior to the commencement of construction works (excluding demolition, site clearance and the laying of foundations), details of how the development is designed to allow future connection to a district heating network should one become available, shall be submitted to and approved in writing by the local planning authority and the development shall be completed in accordance with the approved details.

Reason: To ensure the development is in accordance with the principles of London Plan Policy 5.6

- 27 Within six months of the commencement of the development above ground level, details of suitable obscure glazed panel screening to the eastern sides of the balconies serving the easternmost residential units between the 2nd and 13th floors (inclusive) of the northernmost building hereby approved and between the 3rd and 16th floors (inclusive) of the southernmost building hereby approved. The approved screening shall be implemented in full prior to first occupation of the development and thereafter retained for the life of the development unless alternative details are first approved in writing by the Local Planning Authority.

Reason: In the interest of the privacy of adjoining occupiers and occupiers of the propose development.

- 28 Within six months of commencement of works above ground level, a scheme of detailed landscaping proposals shall be submitted to and approved in writing by the Local Planning Authority.

The submitted scheme shall set out detailed proposals for the following aspects:

- Planting species and densities for all grass, shrubs and 16 proposed trees
- Child Play spaces, including the re-configuration of the north block play spaces to provide a suitable quantum of the north block play space for children older than 4 years
- Measures to achieve wind comfort levels at the on-street blue badge bays, as recommended in submitted Wind Microclimate Report (prepared by Arcaero, dated January 2020)
- Biodiversity mitigation and enhancement measures
- External lighting (including details of lux levels and light spillage diagrams)
- Co-ordination between the landscaping scheme of the development hereby approved and the landscaping scheme of the 10-11 Watkin Road site

The approved landscaping scheme shall be completed prior to the first occupation of the development hereby approved, or in the case of planted elements, within the first planting season after the occupation of the development hereby approved and thereafter maintained, unless alternative details are first agreed in writing by the Local Planning Authority.

Any trees and shrubs planted in accordance with the landscaping scheme and any plants which have been identified for retention within the development which, within 5 years of planting, are removed, dying, seriously damaged or become diseased, shall be replaced to the satisfaction of the Local Planning Authority, by trees and shrubs of similar species and size to those originally planted.

Reason: To ensure a satisfactory standard of appearance and to ensure that the proposed development enhances the visual amenity of the locality, provides functional spaces and to maximise biodiversity benefits.

- 29 Within six months of commencement of works above ground level, a plan showing a revised arrangement of cycle storage within the development hereby approved shall be submitted to and approved in writing by the Local Planning Authority.

The submitted scheme shall set out the following revisions compared to the approved plans:

- A suitable configuration of long stay cycle parking serving the B1a and B1c floor space.

The cycle parking submissions shall be compliant with draft London Plan standards.

The approved details shall be implemented prior to the first occupation of the development hereby approved.

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

Reason: To ensure that the development is fit for purpose and adequately provides for and encourages uptake of cycling among building users.

- 30 Prior to occupation of the development hereby approved, a Delivery and Servicing Plan shall be submitted to and approved in writing by the Local Planning Authority. The Delivery and Servicing Plan shall include details of how adopted footways would be protected and how arrangements can be made for safe and efficient operations without detrimental impact on pedestrian movement, in particular for the access between the servicing layby and the northernmost building hereby approved.

The development shall thereafter operate in accordance with the approved Delivery and Servicing Plan.

Reason: To ensure the development provides a safe and efficient environment in respect of the interplay between pedestrians and delivery/servicing vehicles.

- 31 Unless alternative details are first agreed in writing by the Local Planning Authority, prior to occupation of the development hereby approved, evidence that the noise mitigation measures set out in the submitted Environmental Noise Survey and Acoustic Design Statement (prepared by Hann Tucker Associates, dated February 2020) have been implemented shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To demonstrate a suitable noise environment for prospective residents.

- 32 Any plant shall be installed, together with any associated ducting, so as to prevent the transmission of noise and vibration into any neighbouring premises. The noise level from any plant shall be 10 dB(A) or greater below the measured background noise level at the nearest noise sensitive premises. The method of assessment should be carried out in accordance with BS4142:2014 'Methods for rating and assessing industrial and commercial sound.' An assessment of the expected noise levels and any mitigation measures necessary to achieve the required noise levels shall be submitted to and approved in writing by the Local Planning Authority prior to installation of such plant. All plant shall thereafter be installed and maintained in accordance with the approved details.

Reason: To safeguard the amenity of the neighbours.

INFORMATIVES

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

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

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

- 4 The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:
 - on or within 8 metres of a main river (16 metres if tidal)
 - on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
 - on or within 16 metres of a sea defence
 - involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
 - in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

- For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702422 549. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

- 5 Brent Council supports the payment of the London Living Wage to all employees within the Borough. The developer, constructor and end occupiers of the building are strongly encouraged to pay the London Living Wage to all employees associated with the construction and end use of development.

- 6 The Council recommends that the maximum standards for fire safety are achieved within the development.

Any person wishing to inspect the above papers should contact Toby Huntingford, Planning and Regeneration, Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ, Tel. No. 020 8937 1903