

COMMITTEE REPORT

Planning Committee on
Item No
Case Number

9 September, 2020
04
20/1151

SITE INFORMATION

RECEIVED	13 April, 2020
WARD	Alperton
PLANNING AREA	
LOCATION	All Units at Dowlings Parade, HNS Autos and Delta Hand Car Wash, Bridgewater Road, Wembley, HA0 1AJ
PROPOSAL	Partial demolition of the existing buildings and structures, the erection of a 'co-location' scheme ranging in height from 2 to 7 storeys, incorporating industrial floorspace with residential units, together with associated landscaping, vehicular access arrangements, car and cycle parking, servicing and refuse and recycling facilities.
PLAN NO'S	See condition 2
LINK TO DOCUMENTS ASSOCIATED WITH THIS PLANNING APPLICATION	<p><u>When viewing this on an Electronic Device</u></p> <p>Please click on the link below to view ALL document associated to case https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=DCAPR_149640</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 "20/1151" (i.e. Case Reference) into the search Box3. Click on "View Documents" tab

RECOMMENDATIONS

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

Heads of Terms

1. Payment of the Council's legal and other professional costs in (a) preparing and completing the agreement and (b) monitoring and enforcing its performance.
2. Notification of material start 28 days prior to commencement.
3. 50% affordable housing comprising of 10 affordable rent units at London Affordable rent levels and 4 shared ownership units.
4. Carbon Off-setting– Pre-construction: submission of revised Energy Assessment to achieve London Plan Policy 5.2 standards, initial financial contribution to Brent's carbon offsetting scheme. Post-completion: submission of revised Assessment, final financial contribution.
5. Controlled Parking Zone – Financial contribution of £14,000 towards implementation of Controlled Parking Zone in the vicinity.
6. A parking permit restriction to remove the right of residents to on-street parking permits in any future Controlled Parking Zone that is implemented in the area;
7. Highway Works under a S38/S278 Agreement to:
 - (i) widen the footway along the eastern side of Bridgehill Close fronting the site to 2m
 - (ii) remove the existing crossovers to Bridgewater Road and reinstate them to footway and verge.
 - (iii) repave the footway fronting Bridgewater Road, together with associated amendments to lining, signing, lighting and drainage and any other accommodation works.
8. Car Club - Provision of three years free membership of a local Car Club for all incoming residents.
9. On Street Trees – Two on street mature trees

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:

Conditions

Compliance

1. Three year rule
2. Approved drawings and documents
3. Withdraw permitted development rights for conversion from C3 to C4
4. Non-residential floorspace to be B1(b) or B1(c) only
5. Number of residential units
6. Air Quality Report
7. Ecological Assessment
8. Non Road Mobile Machinery
9. Building Regulations M4(2) 'accessible and adaptable

Pre-commencement

11. Construction Method Statement

12. Construction Logistics Plan
13. Liaison with London Underground

Post-commencement

14. Site Investigation
15. Travel Plan
16. Materials
17. Landscaping Details

Pre-occupation or use

18. Noise Plant Details
19. Soil Contamination
20. Water Consumption
21. Delivery and Servicing Plan
22. BRE Certificate

Informatives

1. CIL Liability
2. Liaison with London Underground
3. Party Wall Act
4. Asbestos removal
5. Quality of imported soil
6. London Living Wage
7. Fire Safety standards
8. Notify Highways of work starting

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

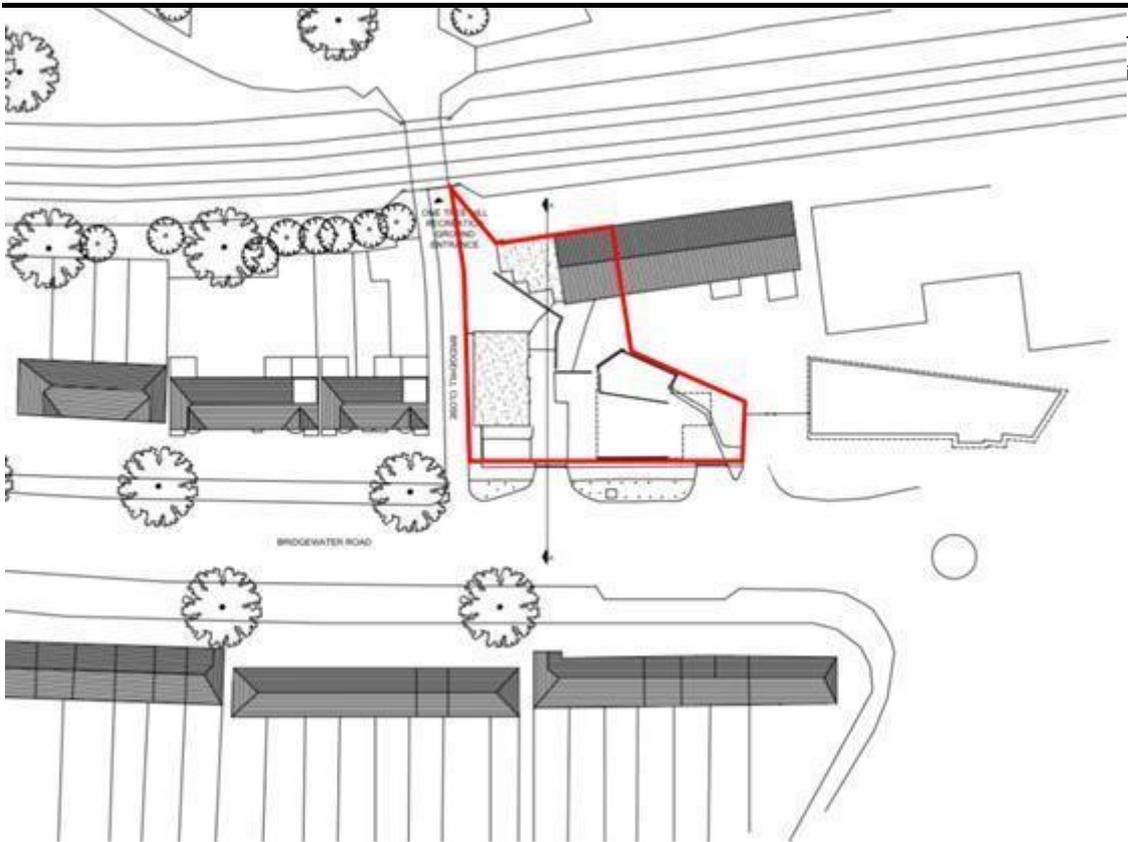


Brent

Planning Committee Map

Site address: All Units at Dowlings Parade, HNS Autos and Delta Hand Car Wash, Bridgewater Road, Wembley, HA0 1AJ

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This map is indicative only.

PROPOSAL IN DETAIL

Partial demolition of the existing buildings and structures, the erection of a 'co-location' scheme ranging in height from 2 to 7 storeys, incorporating industrial floorspace with residential units, together with associated landscaping, vehicular access arrangements, car and cycle parking, servicing and refuse and recycling facilities.

EXISTING

The application site is located on the north eastern side of Bridgewater Road, and to the south east of the junction with Bridgehill Close. It contains three building – the rear proportion of the site contains a warehouse building used to facilitate car repairs (known as HNS Autos), the southern section of the site fronting Bridgewater Road contains a car wash and the northern eastern end along Bridgehill Close contains commercial use at ground floor and a residential flat on the upper floor.

The Piccadilly Underground line tracks run directly north of the site. To the south east are industrial buildings, but these buildings are subject to an industrial co-location redevelopment scheme (LPA Ref: 19/4541) whereby Planning Committee made a resolution at the committee meeting on 24th June 2020 to grant planning permission for the redevelopment subject to completion of a legal agreement and stage 2 referral to the GLA.

The wider surrounding area is mixed in character, comprising traditional residential areas to the west, the Recreation Ground and Alperton School to the north, Alperton Bus Garage to the southeast and commercial and industrial buildings to the south, with large-scale redevelopment occurring in Alperton Growth Area further to the southeast. The site is not within a Conservations Area nor are any of the buildings occupying the site listed buildings.

The site lies within a designated Locally Significant Industrial Site (LSIS). Within the emerging Local Plan it will continue to be designated as LSIS, but is designated for "intensification and some co-location" potentially allowing both industrial capacity and new homes. Whilst it is not within the boundaries of Alperton Growth Area within the adopted Local Plan, the Alperton Growth Area is proposed within the emerging Local Plan to be extended to cover the area along the northern side of Bridgewater Road between the footpath over the railway line to One Tree Hill Recreation Ground and the Bus Depot on the junction with Ealing Road. Within the emerging Local Plan, the application site also forms part of a wider site allocation.

AMENDMENTS SINCE SUBMISSION

Amended plans were provided on the 28/05/2020 to separate the residential and commercial bin storage areas. An additional boundary gate has been provided between the residential and commercial rear access area. The amendments were minor alterations and considered non-material, therefore this did not warrant the need re-consult.

SUMMARY OF KEY ISSUES

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

No objections were received during the course of the application.

Principle of Development:

The proposal is for a residential-led mixed use development that responds well to the emerging policy context encouraging co-location of residential and industrial uses on appropriate sites. The proposed workspace floorspace provided would meet London Plan and local policies requirements. The proposal would also contribute towards the borough's housing targets within this Growth Area.

Affordable Housing and Housing Mix:

The proposed residential units would all be for affordable housing, including 50% of units at a policy-compliant split (70% at London Affordable Rent and 30% shared ownership). The proposal complies with Brent Policy DMP15 and a viability review mechanism is not required. The proportion of family-sized units meets the 25% target set out in Policies CP2 and CP21 and emerging policy and emerging. Overall the development would be policy compliant.

Design and Appearance:

The proposal would incorporate a new build that would contain a maximum height of 7 storeys with upper floor amenity space areas. The ground floor would include large panel glazing for the proposed commercial space on the ground floor. Overall the design is considered to be of a high quality and the overall height and massing are considered appropriate when factoring the high density developments to the south east and the traditional residential properties north west of the application site.

Relationship with Neighbouring Properties:

The proposal would allow for adequate separation distance with regards to the existing residential property north west of the application site. Furthermore the proposal would allow for an appropriate separation distance from the recently approved development at the adjoining site south east of the site. Impacts on daylight and sunlight to neighbouring properties, and overshadowing to neighbouring external amenity spaces, have been assessed and are considered to be acceptable given the site's location within the Alperton Growth Area and provides a transition between the emerging taller buildings on Ealing Road junction and the lower scale suburban housing on Bridgewater Road.

Sustainability and Energy:

The Energy Strategy demonstrates that carbon emissions for the residential use would be reduced by 58.72% and for the commercial use by 60.69%, compared to the Building Regulations 2013 baseline. This exceeds the London Plan policy targets for on-site reductions, and a financial contribution to Brent's carbon offsetting fund would be secured through the s106 agreement, to achieve a zero-carbon residential development. The Energy Statement also takes into consideration SAP2012 calculation methodology. DT: Energy Statement refers to London Plan Policy waiting for agent to confirm. The industrial floorspace would be designed to achieve BREEAM Excellent, to comply with Brent's Policy CP19.

Environmental Health Considerations:

The proposal has been assessed in terms of air quality, noise and vibration, and contaminated land, and Environmental Health officers have requested conditions to ensure these issues are dealt with satisfactorily. A construction method statement would also be required by condition.

Flood Risk and Drainage

The site is located in a Flood Zone 1 area and therefore has a low risk level of any potential flooding. The proposal development would greatly reduce the surface water run off leaving the site and as such would reduce flood risk on site and elsewhere.

Trees, Landscaping and Biodiversity:

All trees on or adjoining the site are of low arboricultural value and the ecological value of the site and its surroundings is low. Tree protection measures have been proposed, together with ecological enhancements provided as part of the landscaping scheme.

Transport Considerations

Transport Officers and Transport for London raised no objection to the proposal. The level of car parking is considered sufficient given the level of public transport accessibility. A financial contribution of £14,000 would be provided towards the implementation of a Controlled Parking Zone. Servicing and refuse arrangements are acceptable. A final Delivery and Service Plan has been requested via condition . Satisfactory levels of cycle parking are proposed to London Plan standards. An additional Travel Plan Statement has also been requested via a planning condition.

RELEVANT SITE HISTORY

19/3819 - Partial demolition of the HNS Autos building and other associated buildings on site and erection of new building of part 2, part 4 and part 8 storeys comprising 32 residential units at 1st to 7th floors and commercial space to accommodate a range of Class B-uses (B1(a), B1(b), B1(c) and B8 at ground floor level, cycle parking spaces, blue badge parking, amenity space and landscaping – Refused, 03/02/2019. An appeal has been submitted to the Planning Inspectorate.

Reasons:

1. The proposal would fail to provide an adequate level of industrial floorspace within a designated Locally Significant Industrial Site to meet identified need within Brent, designated as a "provide capacity" borough within the draft London Plan. Furthermore, the provision of B1(a) floorspace does not form part of the mix of traditional industrial space. Overall, the proposal would result in the loss of B use employment floorspace within a Locally Significant Industrial Site to the detriment of the supply and availability of employment sites and the associated employment opportunities within the Borough. The proposal would be contrary to both adopted policy DMP14 of the Brent Local Plan Development Management Policies 2016 and Policy CP20 of the adopted Brent Core Strategy 2010, together with policies E4 and E7 of the draft London Plan and policies BE2 and BSWSA1 site allocation of Brent's emerging draft Local Plan.

2. The proposed development, by virtue of its overall height and proximity to the suburban housing on Bridgewater Road, would appear as an excessively tall building which would result in poor transition between the scale of development within the Alperton Growth Area and the suburban housing immediately to the west of the development site. As a result, the development would be detrimental to the character of the area and the streetscene, contrary to Policy DMP1 within Brent's Development Management Policy 2016, and to guidance within Brent's Design Guide SPD 2018.

3. The proposal by virtue of the proximity of sole habitable room windows and balconies/terraces to flats 2 and 7 in relation to the boundary with No. 2 Bridgewater Road would result in unacceptable levels of overlooking and loss of privacy to the detriment of the amenities of the occupiers of No. 2 Bridgewater Road. Furthermore, the proximity of the bedroom of flat 2 to the screen of the terrace for flat 3, would result in unacceptable levels of outlook from the bedroom window, to the detriment of the amenities of future occupiers of flat 2. This would be contrary to

policy DMP1 of Brent's Development Management Policies 2016 and the guidance set out in SPD1 "Brent's Design Guide" 2018.

4. The proposal, by reason of the proximity of habitable room windows and external amenity spaces of the proposed development to the boundary with the adjoining industrial site, would fail to have an appropriate regard to the nature of the adjoining as either an existing industrial location or a development site, either for industrial or mix-use purposes. As such, the submission fails to appropriately demonstrate that the proposal is will result in a good standard of accommodation for future residents and an acceptable relationship with adjoining development site thus resulting in an impact on the capacity of the adjoining site for industrial and residential purposes. This is contrary to policy DMP1 and DMP14 of Brent's Development Management Policies and emerging policies E4 and E7 of the draft London Plan and policies BE2 and BSWA1 site allocation of Brent's emerging draft Local Plan.

5. The applicant has failed to agree an appropriate legal agreement which would ensure that the proposal can achieve a satisfactory amount and tenure mix of affordable housing, an appropriate level of carbon reduction across the scheme and BREEAM excellent rating for the commercial floorspace, job & training opportunities for local residents, necessary highway improvement works, and necessary contributions towards the implementation of any future controlled parking zones. The proposal would be contrary to London Plan Policy 3.11, 3.12, 3.13, 5.2, 5.3 and 7.4, Core Strategy Policies CP1, CP2 and CP19 and Development Management Policies DMP1, DMP11, DMP12, DMP13 and DMP15. The proposal would also fail to comply with the emerging policies E3, H7, SI.2 of draft London Plan and policies BH5, BE1 and BT1 of the emerging Local Plan, and Brent's S106 Planning Obligations SPD.

CONSULTATIONS

Public Consultation

58 properties were consulted on the application on 16/04/2020.

A site notice was posted on the 27/04/2020.

The application was advertised in the press on 23/04/2020.

No comments have been received. application.

Internal Consultation

- Environmental Health Officer - No objections to the development. Requested additional information via conditions discussed within the report.

- Sustainability Officer – No objections to the development. Requested relevant conditions discussed within the report.

External Consultation

- London Underground: No objections to the development. Requested a condition regarding detailed design and method statements.

- Thames Water – No objections to the previous development.

- Secure by Design Officer – Raised concerns regarding the residential entrance. The commercial bicycle store is not ideally located. The bin store for both the residential and commercial tenants need to be separate. The location of the residential blue badge parking space would have the

potential increasing a risk of crime. The boundary line between the residential and commercial merges in an uncontrolled area. It is important to ensure that the façade panel detailing does not provide climbing opportunities up the building in particular onto the private or shared terraces. These matters are discussed within detailed considerations element part of the report.

POLICY CONSIDERATIONS

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

The development plan is comprised of the London Plan 2016, Brent Core Strategy 2010 and Brent Development Management Policies 2016.

Key policies include:

The London Plan 2016

Key policies include:

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

5.2 - Minimising Carbon Dioxide emissions

5.13 - Sustainable Drainage

6.3 - Assessing effects of development on transport capacity

6.9 - Cycling

6.10 - Walking

7.2 - An inclusive environment

7.8 – Heritage Assets and Archaeology

Brent Core Strategy (2010)

CP1: Spatial Development Strategy

CP2: Population and Housing Growth

CP8: Alperton Growth Area

CP18: Protection and Enhancement of Open Space and Biodiversity

CP19: Brent Strategic Climate Change Mitigation and Adaptation Measures

CP20: Strategic Industrial Locations and Locally Significant

CP21: A Balanced Housing Stock

Brent Development Management Policies (2016)

DMP 1: Development Management General Policy

DMP8: Open Space

DMP 9 B: On Site Water Management and Surface Water Attenuation

DMP 11: Forming an Access on to a Road

DMP12: Parking

DMP 13: Movement of Goods and Materials

DMP14: Employment Sites

DMP 15: Affordable Housing

DMP 18: Dwelling Size and Residential Outbuildings

DMP 19: Residential Amenity Space

#Emerging Policy Context

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.

The draft London Plan has recently been subject to an Examination in Public, and is at the intend to publish stage.

These documents collectively carry increasing weight in the assessment of planning applications as they progress through the statutory plan-making processes.

The Draft London Plan – Intend to Publish Version

Key policies include:

D3 – Optimising site capacity through the design-led approach

D4 - Delivering good design

D5 - Inclusive design

D6 - Housing quality and standards

D7 - Accessible housing

D12 – Fire Safety

D13 – Agent of Change

D14 - Noise

E4 - Land for industry, logistics and services to support London's economic function

E6 – Locally Significant Industrial Sites

E7 Industrial intensification, co-location and substitution H1 - Increasing Housing Supply

H5 - Threshold approach to applications

H6 – Affordable housing tenure

G5 – Urban Greening

SI1 – Improving air quality

SI.2 – Minimising Greenhouse gas emissions

SI.5 - Water Infrastructure

SI.13 - Sustainable drainage

S4 - Play and Informal Recreation

T2 - Healthy Streets

T4 - Assessing and mitigating transport impacts

T5 – Cycling

T6 - Car parking

Brent's draft Local Plan

Key policies include:

- Policy DMP1 Development Management General Policy
- Policy BP7 South West
- Policy BSWGA1 Alperton Growth Area
- BSWSA1 Alperton Industrial Sites
- Policy BD1 Leading the Way in Good Urban Design
- Policy BD2 Tall Buildings in Brent
- Policy BH1 Increasing Housing Supply in Brent
- Policy BH2 Priority Areas for Additional Housing Provision within Brent
- Policy BH5 Affordable Housing
- Policy BH6 Housing Size Mix
- Policy BH13 Residential Amenity Space
- Policy BE1 Economic Growth and Employment Opportunities for All
- Policy BE2 Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS)
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- Policy BGI2 Trees and Woodlands
- Policy BSUI1 Creating a Resilient and Efficient Brent
- Policy BSUI2 Air Quality
- Policy BSUI4 On-Site Water Management and surface water Attenuation
- Policy BT1 Sustainable Travel Choice
- Policy BT2 Parking and Car Free Development

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

- Policy BT4 Forming an Access on to a Road

The following are also relevant material considerations: _

National Planning Policy Framework 2019

Brent Waste Planning Guide 2013

Brent's Supplementary Planning Guidance 1, Mayor's,

Brent's S106 Planning Obligations SPD

Mayor of London's Play and Informal Recreation SPG 2012

Mayor of London's Sustainable Design and Construction SPG 2014

Mayor of London's Housing SPG 2016

Mayor of London's Affordable Housing and Viability SPG 2017

DETAILED CONSIDERATIONS

Background

Application 19/3819 was refused for a numerous of reasons as outlined above. The application failed provide a satisfactory level of industrial floorspace within a designated Locally Significant Industrial Site. The proposed height and proximity of the development to the suburban housing on Bridgewater Road was not considered an appropriate transition due to the overall scale of the building. The application was also refused on the basis that the north western flank elevation would result in unacceptable levels of overlooking to the occupants of No. 2 Bridgewater Road. The proximity of the habitable room windows along the south eastern elevation of the site failed to have an appropriate relationship with regards to the nature of the adjoining industrial location or development site, either for industrial or mix-use purposes.

The current application has therefore included modifications to this scheme to overcome the previous reasons for refusal which are considered within the report.

Proposal in Detail

The application is seeking planning permission to demolish the existing buildings occupying the site. The proposal would incorporate a new mixed development comprising of commercial floorspace on the ground floor followed by 28 residential units on the upper floors which would include 10 x 1-bedroom, 11 x 2-bedroom, and 7 x 3-bedroom units.

The new build would contain a maximum of 7 storeys. The main entrance to the upper floor residential units would be situated along Bridgehill Close. A new access will be included to the rear of the site which would be used for servicing and parking. One disabled parking space would be provided to the rear of the proposed development. A communal garden area would be provided on the first floor along the south eastern portion of the site. Additional communal amenity space would be provided on the proposed fourth floor plan and proposed roof. A cycle store will be provided for 64 residential cycle spaces and a separate area would be provided for commercial cycle stores.

Principal

Industrial Floorspace

1. The application site is covered by a Locally Significant Industrial Site (LSIS) designation. Core Strategy

2010 Policy CP20 outlines that the council will protect LSIS for the same range of uses as Strategic Industrial Locations. The regeneration of these sites is supported where the proposals would not undermine the employment land hierarchy, although the supporting text makes clear that this policy aims to secure the status of the location as an industrial employment area through redevelopment for industrial use. Policy DMP14 provides further protection for LSIS sites, setting out specific criteria for their release, and seeks to limit the loss of industrial land to approximately 11.5ha within the plan period.

2. However, this excess capacity was subsequently met and if all consents / proposals were implemented, the resultant loss of industrial land would exceed the policy target before the end of the plan period and any further loss of industrial floorspace would reduce Brent's industrial land supply and would be inconsistent with Policy DMP14. The draft new London Plan also identifies that across London loss of employment sites has been far greater than expected, and proposes that across London as a whole there should be no further losses.
3. Draft Policy E7 sets out an approach to combining increased industrial capacity with the delivery of other planning objectives, by encouraging industrial intensification and co-location with other uses including residential, on suitable sites in locations well-connected by public transport. The policy seeks a plan-led approach to identifying areas within LSIS designations that are suitable for intensification and co-location. This is reinforced within draft Policy BE2 of Brent's draft Local Plan which looks to establish the framework to meet both housing need and industrial capacity, and land is identified where both can be provided (known as co-location). The draft Local Plan has designated this LSIS site (Alperton North) for intensification and co-location and while the GLA have objected to the proposed policy designation of some Strategic Industrial Locations for co-location, they have not objected to the LSIS designation and the principle of co-location is in line with the emerging London Plan. It is considered that policy BE2 can be given weight in relation to this site.
4. The Secretary of State has recently directed modifications to the Mayor's intend to publish London Plan Policies E4, E5 and E7. The modifications to Policy E4 would have the effect that Brent would no longer be identified as a provide capacity borough, and there would be no requirement to secure no net loss of industrial floorspace on individual sites. However, the directions also emphasise the need for boroughs to continue to meet identified industrial needs. In the case of Brent, according to the GLA's London Plan evidence base, there would still be a need to plan for an additional 43 hectares equivalent over the Local Plan period to 2041. Therefore it is still important to recognise and maximise opportunities for the re-provision of industrial capacity on site through co-location and intensification. In line with that aim, Brent's emerging Policy BE2 supports proposals on LSIS sites where they intensify employment uses and accord with the principle of a net increase in employment floorspace.
5. Brent's draft Local Plan identifies this site as part of a site allocation (BSWSA1: Alperton Industrial Sites), which seeks mixed use redevelopment involving co-location of housing and industrial uses. As a minimum, the existing industrial floorspace or the industrial capacity (a 0.65 plot ratio) should be provided across the wider site allocation. The site currently contains approx.. 584sqm of commercial floorspace, including warehouse use, car repairs and a car wash. However, the industrial capacity is the higher of the existing industrial floorspace or 0.65 times the area of the site, which would be 720sqm (accounting for 0.65% plot ratio). Both draft Policy E7 and the proposed site allocation require the greater of existing floorspace or industrial capacity to be reprovided.
6. The proposal would provide approximately 720sqm workspace at ground floor level. This amount of floorspace complies with the LSIS 0.65 plot ratio method in accordance with the emerging London Policy E7 and emerging policy BE2. The industrial floorspace is proposed within use class B1c which meets the policy requirements. It will be targeted at 'starter' and 'move on' units for small and medium enterprises, and studios for artists and cultural and creative industries. The space can be subdivided into a range of studio/unit spaces to cater for artists or creative industries. The subdivided units would have large glazed frontages, ensuring the units appear active and providing passive surveillance, making the design secure and safe. The quantum of industrial floorspace falling within use class B1c would overcome the previous reason for refusal.

Residential Development

7. The NPPF 2019 also emphasises the provision of new homes as one of the key roles of the planning system, and this is reflected in the housing targets set out in Core Strategy Policy CP2, which aims to deliver 22,000 new homes over the 2007-2026 period. The draft new London Plan proposes a substantial increase in housing targets across London, including a target for Brent of up to 2,325 new homes per year. Brent's draft Local Plan responds to these targets by proposing plan-led growth and

site-specific allocations concentrated in a number of Growth Areas. Emerging policy BH1 reflects the draft London Plan target.

8. The NPPF 2019 also emphasises the provision of new homes as one of the key roles of the planning system, and this is reflected in the housing targets set out in Core Strategy Policy CP2, which aims to deliver 22,000 new homes over the 2007-2026 period. The draft new London Plan proposes a substantial increase in housing targets across London, including a target for Brent of up to 2,325 new homes per year. Brent's draft Local Plan responds to these targets by proposing plan-led growth and site-specific allocations concentrated in a number of Growth Areas. Emerging policy BH1 reflects the draft London Plan target.
9. The proposal would provide 28 new homes in an accessible location within the Alperton Housing Zone. The introduction of housing in this location is supported by the emerging policy context, which directs new homes within the Growth Area and Site Allocations identified within the emerging Local Plan in line with emerging Policies BH2, BSWA1 and BE2. The proposal would make a significant contribution to the Borough's housing targets, and is considered to be acceptable in principle subject to other material planning considerations.

Affordable Housing and Housing Mix

Policy Background

10. Brent's adopted local Policies CP2 and DMP15 set out the requirements for major applications in respect of affordable housing provision, and stipulate that schemes should provide 50% of homes as affordable, with 70% of those affordable homes being social or affordable rented housing and 30% of those affordable homes being intermediate housing (such as for shared ownership or intermediate rent). The policy also allows for a reduction in affordable housing obligations on economic viability grounds where it can be robustly demonstrated that such a provision of affordable housing would undermine the deliverability of the scheme. The policy requires schemes to deliver the maximum reasonable proportion of Affordable Housing (i.e. the most that the scheme can viably deliver, up to the target). It does not require all schemes to deliver 50% Affordable Housing.
11. The definition within DMP15 allows for affordable rented housing (defined as housing which is rented at least 20% below the market value) to be an acceptable form of low cost rented housing, which is consistent with the NPPF definition of affordable housing.
12. The emerging London Plan (Intend to Publish Version) affordable housing policy (Policies 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.
13. 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 (emerging Policy H5), with schemes not viability tested at application stage if they deliver at least 35% (or 50% on public sector land / industrial land) and propose a policy-compliant tenure split. Brent draft 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 Policy H6 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.
14. Brent's draft Local Plan has yet to be examined by the Planning Inspectorate and as such the adopted Policy DMP15 would carry considerably more weight than the emerging policy at present.
15. 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. The policy requirements can be summarised as follows:

Policy context	Status	% Affordable Housing required	Tenure split		
Existing adopted policy	Adopted	Maximum reasonable proportion	70% Affordable Rent (to 80% Market)	30% Intermediate	
Emerging London Plan	Greater weight	Maximum reasonable proportion	30% Social / London Affordable Rent	30% Intermediate	40% determined by borough
Emerging Local Plan	Limited weight	Maximum reasonable proportion	70% Social / London Affordable Rent	30% Intermediate	

Assessment

16. The proposal would provide the following mix of units:

	1bed	2bed	3bed	Total
London Affordable Rented units	3	3	4	10
Shared ownership units	1	2	1	4
Market Units	6	6	2	14
Total units	10	11	7	28
% of total	35%	40%	25%	100%

17. The scheme proposes 50% affordable housing by unit (54% by habitable room), and the tenure split would be 70:30 London Affordable Rent to Shared Ownership. This would fully comply with the requirements of Policy DMP15 and emerging policy BH5. Furthermore, it would comply with the threshold criteria set out in draft London Plan Policy H6.
18. The proposal does not require a Financial Viability Assessment to comply with either Brent or London Plan policy requirements, and the provision of this level of affordable housing is considered to be a significant planning benefit.
19. The affordable rented units would be provided at London Affordable Rent and the Shared Ownership units in line with the household income cap and eligibility criteria for intermediate products set out in the London Plan and draft London Plan. Intermediate/shared ownership income thresholds are set out in the latest London Plan AMR 15 (published October 2019). These matters would be secured through the s106 agreement.
20. The scheme proposed 7 family sized units, accounting for 25%. The number of family sized units complies with CP2 and CP21 and emerging policy BH6 within the Draft Local Plan.

Design, Character and Impact on the Street Scene

21. The NPPF emphasises that good design involves responding to local character and history and reflecting the identity of local surroundings and materials, while not discouraging appropriate innovation, and Policy DMP1 requires the scale, type and design of development to complement the locality.
22. SPD1 outlines that development should respond to the local context and respect the existing character of the landscape, streetscape, architectural and historic environment. New development height, massing and façade design should positively respond to the existing context and scale; facilitating good urban design. Building heights should positively respond to existing character. Development massing should

limit its visual impact by effectively breaking up facades, creating a varied roofscape and relating positively to existing surroundings. It further outlines that buildings should generally fit in with the existing character of roof types within the streetscene and minimise the visual impact from street level.

23. The areas directly south east of the application site currently occupy industrial type buildings which are part of the wider site allocation and designated for higher density type of developments, however the application site is on the periphery of this wider allocation. Traditional two storey residential properties are situated directly south and north west of the application site, but the properties to the west on Bridgewater Road are designated within the draft Local Plan as an intensification corridor.

Height

24. New development should respect the height of the adjoining buildings and local area. The draft Local Plan directs taller buildings within the growth areas and site allocations. The site allocation within draft Local Plan further emphasises the site allocation requests that tall buildings should be centred on the junction of Ealing Road and Bridgewater Road, stepping down towards the peripheries of the sites where in some cases it is likely that adjacent two storey residential properties will remain.
25. The western portion of the proposed new build would contain a stepped approach which would start at two stories, rise to four stories and then increase to an seven storey tower element which will cover the central and south eastern part of the site. It is considered that the maximum height would be appropriate relationship when taken into consideration the traditional suburban nature of the properties located directly west of the application. The proposed stepped approach with a maximum height of seven stories would appear as a suitable transition in relation to the low rise properties to the west and the taller developments established towards the core of the Alperton Growth Area.
26. The proposed modified height when compared to the previous application would overcome the reason refusal regarding the inappropriate height. Overall the proposed height of the new building would complement the surrounding context and act as an appropriate relationship with the established built form to the west of the application site and the high rise developments further south east.

Layout

27. The proposed front building line would be set back from the highway by a substantial distance and would include a public pathway and areas of soft landscaping. It is noted that the proposed front building line would extend beyond the front building line of No. 2 Bridgewater Road by 2.9m. This is considered an acceptable projection forward given the separation distance with this neighbouring property. Furthermore the proposed front building line would also resemble that of the proposed commercial building located to the front segment of the adjoining property.
28. It is noted that the ground floor element of the proposed development would be positioned next to the south eastern splayed boundary. The proposed first floor, second floor and third floor portions of the development would be sited within close proximity of the stepped flank boundary red line however sufficient separation distances would be achieved with the development at the adjoining site. The proposed blue badge space would contain a gate for personal safety reasons for any potential user.
29. The proposal would incorporate a new pathway along Bridgehill Close which would direct future residents towards the entrance along this elevation. This would result in a suitable environment for residents with elements of active frontage provided via window on this side elevation serving the ground floor commercial space. This arrangement further enhances Bridgehill Close for potential footfall for One Tree Hill Recreation Ground users. Additional lighting details have been conditioned which would further improve this area for future users when compared to the existing situation.
30. It is noted that the Secure by Design Officer raised numerous concerns. The proposed development would allow for good active commercial frontage facing Bridgewater Road. The residential entrance along Bridgehill Close is considered satisfactory given that the development would incorporate a new pedestrian pathway for any future occupiers. The proposed bin stores would remain in separate areas which is considered an appropriate relationship for the proposed mixed use nature of the development.
31. Amended drawings were provided during the course of the application by relocating the commercial cycle store adjacent to the commercial bin store. The residential blue badge is located in the best position

available and the parking area is now gated to prevent any potential of crime. The facade detailing is in brick and pre-cast concrete which will not provide climbing opportunities onto the private or shared terraces. Creating flush secure boundary lines will reduce potential Anti-Social Behaviour and enable the residents and occupants of the workspace to take ownership of their respective environments and feel safe and secure when entering and moving around and in the proposal.

32. The development would provide areas surrounding the site that would be utilised both by the residents and users of the commercial workspace. As such, the level of pedestrian footfall that would be generated would suggest that the areas of public realm would be utilised for most of the day and evening. The proposed residential entrance would provide good levels of activity along Bridgehill Close which would benefit the area.

Architecture and Materiality

33. SPD1 states that the use of durable and attractive materials is essential in order to create development that is appealing, robust and sustainable and fits in with local character. Within Brent, the predominant building material used is brick, with smaller amounts of roughcast, pebbledash and render. Brick has over time proved to be a successful material, with strong aesthetic credentials to assist in creating high quality neighbourhoods. Brick and other natural materials and elements of small dimensions create visual interest through patterns and depth.
34. The Design and Access Statement submitted with the application reveals that the primary material will be brick and compatible mortar, articulated with a horizontal banding of precast concrete. A light warm grey coloured brick for the main body of the building is proposed with dark grey brick recessed panels. Pre cast concrete ribbons would wrap around the building every two storeys and form the ground floor colonnade.
35. Concrete would also form the proposed ground and first floor colonnade, acting as a trellis for climbing plants, to add a vertical dimension to the landscaping and encourage biodiversity along the busy Bridgewater Road. The proposed windows would be framed in powder-coated thermally broken aluminium frame. The balconies slabs would be finished in precast concrete with structural glazed clear panels capped with a matching powder-coated aluminium handrail. The principle of the proposed materials are considered satisfactory and would complement the area. A condition has been recommended requesting precise details of the materials.
36. The ground floor would incorporate large panel glazing to the front and side elevation facing Bridgehill Close promoting good active frontages from a street level. The main entrance to the residential units would be situated along Bridgehill Close bring this roadway in to use by pedestrians. A 2m pathway would be created adjacent to the building for pedestrian footfall which in turn would provide access to the rear portion of the site. This concept is generally acceptable however appropriate lighting would be required to ensure this access would result in a safe environment for any potential users. Such details would be secured as a condition on any forthcoming consent.
37. Refuse storage, plant room and cycle parking would be located to the rear portion of the building which is sensible and this provides the opportunity for commercial active frontage facing Bridgewater Road. The location of the commercial cycle store has been revised next to the commercial bin store to improve natural surveillance of the entrance. The bin stores to the residential and commercial uses would contain separate accesses. As outlined above, the proposed blue badge space would be gated for security purposes.

Impact on Neighbouring Occupiers

38. Any development will need to maintain adequate levels of privacy and amenity for existing residential properties, in line with the guidance set out in SPD1. Separation distances of 18m between directly facing windows and 9m to boundaries should be maintained.
39. In terms of the relationship with No. 2 Bridgewater Road, the proposed flank elevation of the proposed development would achieve a separation distance of approximately 8m from the side elevation of this neighbouring property. It is noted that the flank elevation of No.2 contains two upper floor side windows that do not serve habitable rooms. Therefore the 8m separation distance achieved along this portion of the development is considered an acceptable relationship on this occasion. The elements extending beyond the rear building line of No.2 would be set in from the boundary treatment of this property by

approximately 9m. A distance of over 30m is maintained to the properties on the southern side of Bridgewater Road. The proposal is therefore considered to not result in unacceptable levels of overlooking to existing residential properties and complies with policy DMP1.

Overbearing Appearance

40. SPD1 sets out that new developments should normally sit within a line drawn at 30 degree from the nearest rear habitable room window of adjoining development (measured at 2m high from internal floor level) and sit within a line drawn at 45 degree from the neighbouring private rear garden area (measured at 2m above garden level), The 1:2 rule should be applied in respect of extending to the rear of adjacent dwellings (the rear building line should not project further to the rear than half the distance between the proposed flank wall and the centre point of the nearest existing rear habitable room window. This is to ensure that a development does not appear overbearing or adversely impact on outlook.
41. In this case, there is no properties to the rear. The rear garden of No. 2 Bridgewater Road is separated from the application site by Bridgehill Close, so it is not considered appropriate to apply the 45 degree line or 1:2 rule as they do not directly adjoin one another and a separation of over 8m being maintained. Nevertheless, the impact of the proposal upon daylight and sunlight to neighbouring sites does need to be considered and this is discussed below.

Daylight and Sunlight

42. In terms of impacts on daylight and sunlight to neighbouring properties, BRE Guidelines recommend two measures for daylight. Firstly, the Vertical Sky Component (VSC) assesses the proportion of visible sky and is measured from the centre of the main window. If this exceeds 27% or is at least 0.8 times its former value, residents are unlikely to notice a difference in the level of daylight. Secondly, the No Sky Contour or Daylight Distribution assesses the area of the room at desk height from which the sky can be seen. The BRE guidance sets a target of 0.8 times its former value.
43. To assess impacts on sunlight to existing south-facing windows and amenity spaces, assessment of Annual Probable Sunlight Hours (APSH) is recommended. Adverse impacts occur when the affected window receives less than 25% of total APSH including less than 5% in winter months, or when amenity spaces receive less than two hours sunlight on 21 March or less than 0.8 times their former value.
44. However, the BRE also recognise that different criteria for daylight and sunlight may be used in dense urban areas where the expectation of light and outlook would normally be lower than in suburban or rural areas, and the NPPF 2019 also supports a flexible approach to applying standards in order to make efficient use of sites. Furthermore, recent appeal decisions suggest that 15% VSC can be acceptable within some dense urban contexts.
45. The Sunlight and Daylight consultant has identified that the changes shown on the revised drawings submitted via this application will not materially affect the results of the original Sunlight and Daylight Report submitted with the previous application. The proposed development is one storey lower in comparison to the previous application. As such the amended layout would result in a relationship that is satisfactory as discussed below.
46. All main habitable room windows tested amongst the neighbouring properties pass the Vertical Sky Component (VSC) test and the Daylight Distribution. All windows pass both the total annual sunlight hours test and the winter sunlight hours test. The proposed development therefore satisfies the BRE direct sunlight to windows requirements. It is noted that some windows fail however none of these windows serve habitable room windows, including windows W19 and W23 at 2 Bridgewater Road, and the remaining windows serving porches and hallways. Furthermore certain windows fail to meet the Daylight Distribution test however these windows do not serve habitable room windows. All windows that face within 90 degrees of due south have been tested for direct sunlight. All windows pass both the total annual sunlight hours test and the winter sunlight hours test. The proposed development therefore satisfies the BRE direct sunlight to windows requirements.
47. The results confirm that all gardens or amenity areas pass the BRE overshadowing to gardens and open spaces with the exception of garden 1 at No. 2 Bridgewater Road. The sunlight availability to garden 1 will be reduced to less than 0.8 times its former value after the proposed development. This slight infringement is considered acceptable given that the site is part of a wider growth area. As a result the minor failings in the results of the sunlight and daylight report are considered satisfactory and the development would retain a satisfactory relationship with the neighbouring properties surrounding the

application site.

Impact on Wider Site Allocation

48. The site allocation recognises the benefits of a wider masterplan for the site allocations, although it does not explicitly state that a comprehensive masterplan must be prepared. Therefore, whilst each site can come forward for redevelopment, there is the need to ensure that they do not compromise the wider delivery of the site allocation or the continued function of the neighbouring site in its current form as LSIS. To address such matters, the LPA seeks for 9m to be maintained between habitable room windows/balconies/terraces and the boundary with adjoining development sites.
49. The previous application contained sole habitable room windows depending on outlook towards the adjoining site south west of the application. It was concluded that this relationship would fail to an appropriate regard to the nature of the adjoining site as either an existing industrial location or a development site, as an industrial use or mix-use purposes.
50. It is noted that an application has been submitted regarding the adjoining site directly south east of the site (Application 19/4541). The application attended the June Committee and was approved by members subject to stage 2 referral with the Greater London Authority and a legal agreement agreed. As such substantial weight can be given to the layout of this development.
51. Block A would be situated along the north western portion of the site would be sited approximately 13m from the shared boundary. Furthermore the flank elevation of Block C which would occupy the southern portion of the site would be approximately 8m from the splayed boundary. It is noted that Block C would facilitate workspace provision to the site and therefore no residential uses would occupy this building.
52. The side window that would serve Flat 4 (and similar flats on the upper floors) now proposes splayed windows to the bedrooms that would direct outlook at an angle over the application site rather than directly into 2a Bridgewater Road. The balconies of these flats would also have a flank wall screen to prevent direct overlooking into 2a Bridgewater Road, and this would be secured as a planning condition.
53. The residential windows linked to the flats situated at the front portions of the site would also be set in appropriately from the shared boundary treatment and as highlighted above Block C would not facilitate any residential units. As such given the re-orientation of the windows to south eastern flank elevation and the overall distance achieved with flank elevation of Block B the proposal would overcome the previous reason for refusal on this matter.

Daylight and Sunlight

54. The Sunlight and Daylight Report submitted with the application also takes into consideration the proposed development at the adjoining site. It is noted that the results relate to a slightly different configuration to what has recently been approved. Notwithstanding this, the consultant outlined that differences would not materially affect the overall conclusion within the results provided during the course of the application. The results identify that the majority of the windows and rooms at 2a Bridgewater Road will meet BRE daylight tests via Vertical Sky Component (VSC) and Daylight Distribution. It is noted that some windows fall short slightly of the recommended target of the BRE target of 0.8. Furthermore a number of windows that fail the VSC test however numerous windows are situated beneath overhanging balconies. Additional windows that fail also contain secondary windows that would contain a main window which passes the VSC test.
55. The result also demonstrates that the windows at 2a Bridgewater Road tested for direct sunlight pass the annual probable sunlight hours tests. As such the proposed development there would have an acceptable impact regarding sunlight obtained by the proposed development at 2a Bridgewater Road.
56. A Noise Impact Assessment has also been submitted that has considered the impact of noise and the road and railway line upon the new development. It has recommended mitigation measures through specified glazing to secure internal noise levels to meet the requirements for BS8233:2014. It is considered that with such mitigation measures being secured, that the proposed development would not unreasonably prevent the remaining of the LSIS site to continue to operate for industrial purposes with intensification, should a co-location scheme not be built out in the future.
57. Overall, the proposed relationship with the adjoining site is considered satisfactory and overcomes the concerns related to the previous refused application.

Quality of Accommodation

Daylight, Sunlight and Overshadowing

58. A Sunlight and Daylight report was submitted with the application assessing the internal arrangement of the proposed residential units. The report is linked to the previous refused scheme however sunlight and daylight consultant confirmed that the changes linked to the drawings submitted with the application would not materially affect the findings of the original report given that the current application would be one storey lower when compared to the previous application.
59. The information submitted demonstrates that all rooms meet or surpass the BRE Average Daylight Factor targets and all rooms pass the room depth test. All of the proposed rooms tested meet or surpass the BRE numerical daylight recommendations. Whilst not all living rooms will receive ideal levels of sunlight, the BRE guide does not give mandatory requirements for sunlight availability.
60. The orientation of each of the proposed units allows for satisfactory access to sunlight. Furthermore the proposal would not result in any single aspect north facing units. The proposal would allow for sufficient sunlight to the amenity spaces throughout the development. The proposal would not include any single aspect units and would include all satisfactory layout that would provide dual aspect units on each floor.
61. Overall internal layout of each flat provides sufficient levels of outlook and access to daylight.

Floorspace Requirements

62. DMP18 outlines that the size of dwellings should be consistent with London Plan Policy 3.5 Table 3.3 Minimum Space Standards for New Dwellings. This is also set out in draft policy D6 of the emerging London Plan. The updated Design and Access Statement submitted with the application identifies that each of the proposed units would meet the required the floorspace standards.
63. There are no more than 6 units per core and 27 out of 28 units are dual aspect, with good levels of outlook overall. A number of flats facing No. 2a Bridgewater Road have splayed windows to the bedrooms to prevent direct overlooking onto the neighbouring site, but sufficient levels of outlook and daylight are provided to these bedrooms.
64. It is noted that Flat 2 has a kitchen area is situated a significant distance from the living room window, however the flat meets the London Plan floorspace requirements and the bedroom would be served by two windows which would result in a dual aspect room. It is noted the proposed balcony would just fall short of the London Plan space requirements. This shortfall is considered acceptable on this occasion given the level of communal amenity provided with the scheme and the close proximity of One Tree Hill Recreation grounds.

Accessibility

65. The development has been designed so as to be step-free with level access from the external environment for residents and visitors through clearly visible and identifiable entrances from the public realm.
66. The scheme has been designed to inclusive design and access standards for the approaches, communal circulation and interiors of the dwellings (subject to detail design) have been designed in accordance with Building Regulations Part M4(2) 'accessible and adaptable homes' with 3 units designed to Building regulations M4(3) 'wheel chair accessible homes standards' and the Building Regulations Part K (accounting for over 10%). This is in line with policy 3.8 of the London Plan which seeks 10% of homes in major developments being adaptable for use by disabled residents.

Amenity Space

67. DMP19 outlines that 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 is normally expected to be 20sqm per flat and 50sqm for family housing (including ground floor flats). New developments should provide private amenity space to all dwellings. Where sufficient private amenity space cannot be achieved to meet the full requirement of the policy, the remainder should be

supplied in the form of communal amenity space.

68. In line with policy DMP19 and emerging policy BH13, the scheme would be required to provide a total of 560sqm of on-site amenity space provision (i.e. 20sqm x 28units). The policy states that this should be private external amenity space per unit but recognises that in denser schemes this can be difficult to solely achieve through private amenity space, and allows the shortfall to be offset through communal amenity space. In this case, each of the homes is provided with a private balcony or terrace that is a minimum of 5sqm and 1.5m deep. The shortfall in private amenity space is 220sqm. To offset this shortfall three communal gardens are proposed (1st, 4th and roof levels), adding to a total of 432sqm of communal amenity space. The communal amenity spaces overcome the deficiency in private amenity space, and the scheme fully complies with policy DMP19 and emerging policy BH13.
69. The main children's play areas are on the first floor and fourth floors. It is anticipated that the first floor would contain stepping stone, balancing logs and sand pit. These area would measure 45sqm. The fourth floor would also include an astro turf area which is more flexible space for young people to use which measures 89sqm. Furthermore the proposed flexible communal space on the roof would measure approximately 260sqm. The GLA population yield calculator indicates the development should provide 180sqm play space. The level of amenity space and play space outlined above is satisfactory. Furthermore the site is within close proximity to the play space situated at One Tree Hill Recreation Ground.
70. Overall, the residential accommodation proposed is considered to be of high quality and to comply with the relevant policies. Furthermore, the provision of amenity space is considered to be very good in terms of the amount and type of space proposed, and fully compliant with the relevant policies. Further details of hard and soft landscaping proposals for the communal amenity space would be required by condition.

Transport and Highway Considerations

Parking

71. As public transport access to the site is good, the lower residential car parking allowances set out in Table 6 at Appendix 1 of the adopted DMP 2016 apply. The location of the site to the north of the Dudding Hill railway line also means that the higher allowance of one space per 200m² for employment use set out in Table 3 applies.
72. Up to 31 residential and three commercial car parking spaces would therefore be allowed and the proposed provision of just one off-street disabled parking space would accord with maximum standards.
73. Policy DMP12 also requires that any overspill parking that is generated can be safely accommodated on-street in the area. In this respect, it is generally assumed that private housing would generate parking at 75% of the maximum allowance and affordable housing at 50% of the maximum allowance. With 10 units proposed for London Affordable Rent this would translate to an estimated demand for about 19 spaces, which corresponds very closely with data for flats in the area taken from the 2011 Census.
74. With only one off-street space proposed, an overspill of about 18 cars can be expected. This level of on-street parking demand exceeds the on-street parking capacity along the site frontage or in the wider area (which is already heavily parked), so would be a concern unless suitable mitigation is applied.
75. The site is located within a housing growth area and within the extension to the boundaries of the Alperton Growth Area, and with other nearby developments having recently been approved with limited levels of off-street car parking, there is likely to be increasing demand for a Controlled Parking Zone in the area to address parking problems (as proposed in the Alperton Housing Zone Transport Assessment).
76. If implemented, a CPZ would help to mitigate parking concerns with the proposal, as it would allow a parking permit restriction to be enforced by Brent Council. A condition or Legal Agreement is therefore sought to withdraw the right of any residents of the development to park in any future CPZ that is introduced in the area.
77. A Car Club operates from nearby Atlip Road already. To help to promote this, the applicant has confirmed that they would be willing to fund membership of the Car Club to incoming residents for two years, which is welcomed. The proposed space is shown with an electric vehicle charging point, which is welcomed.

Cycle Parking

78. An internal residential cycle store room is indicated on the ground floor of the building with capacity for 64 bicycles, plus a commercial store for at least 8 bicycles, thus satisfying the long-stay requirements in a secure and sheltered location. Four further bicycle spaces are also proposed along the site frontage to satisfy the short-term visitor parking requirement in an easily accessible location.

Servicing

Refuse:

79. Separate bin stores for the commercial and residential units are proposed towards the rear of the building fronting Bridgehill Close and the capacity shown for the residential store (six Eurobins and five wheeled bins) is more than sufficient to meet residential storage standards. Sliding doors are proposed to ensure Bridgehill Close does not become obstructed when the bin store is in use. The applicant has then suggested that bins will be relocated to the site frontage by a building caretaker on collection days, so that refuse vehicles can collect the bins from Bridgewater Road rather than reversing along the narrow Bridgehill Close, which is supported by your highways officer.

Servicing:

80. Under the standards set out in Appendix 2 of the adopted DMP 2016, the proposed ground floor workspace generally needs servicing by 8m rigid vehicles (only if the entire space were used as a single storage unit might the requirement increase to a 10m rigid vehicle). An off-street servicing area with 5.3m headroom to balconies above is proposed to the rear of the site to meet this requirement, with access from Bridgehill Close. Suitable kerb splays have been indicated to allow 8m vehicles to reverse into the loading area and drive out again in a forward gear (as demonstrated with tracking), thus ensuring they do not need to reverse into or out of Bridgewater Road.

81. To help to manage deliveries, a Delivery & Servicing Plan has been submitted with the application. This estimates that the building will generate eleven van deliveries per day (ten for the workspace and one for the flats). Once the workspace is occupied, information will then be gathered on delivery movements (type of delivery, type of vehicle, delivery times, delivery company etc.) and included into a proposed action plan to manage delivery movements and ensure all deliveries are in FORS accredited vehicles (such as through delivery booking and tracking, lorry routeing etc.). The plan will then be monitored annually to gauge its success in meeting set targets.

82. As the submitted DSP is essentially a draft document at present, a condition is recommended requiring the submission and approval of a more detailed document prior to occupation of any of the ground floor workspace.

Pedestrian Access

83. The proposed building is to be set back from the Bridgehill Close kerbline to allow a 2m wide footway to be provided along the eastern side of Bridgehill Close. This will serve the main residential entrance to the building and should be offered for adoption through a joint S38/278 Agreement under the Highways Act 1980. This agreement should also cover removal of the existing crossovers to the site and reinstatement to footway/verge, including repaving of the existing lengths of footway along the site frontage.

Other Matters

Impact on Traffic

84. A Transport Statement has been submitted with the application to consider likely future trips to and from the site. Only vehicular trips have been calculated though and these are estimated to total eight movements in each peak hour (8-9am and 5-6pm). This level of vehicular traffic is not considered significant enough to cause any concern with regard to the operation of the local highway network, particularly as the existing car repair and car wash facilities on the site would be likely to generate considerably greater volumes of traffic. Although other modes of transport have not been considered, the scale of the development is not considered sufficient to result in a significant impact on public transport, walking or cycling capacity in the area.

85. The development proposal would likely to reduce vehicular movements into and out of the site, whilst also removing two accesses from the site directly onto Bridgewater Road, the proposal is generally likely to offer minor improvements to road safety in the area.
86. Framework Travel Plan has been submitted for the building to help to manage trips and minimise vehicular trips in particular. The Travel Plan proposes the appointment of a Travel Plan Co-ordinator to develop and implement the plan, with proposed measures including the provision of maps and travel information in Welcome Packs, participation in promotional events and promotion of car sharing databases.
87. Initial surveys of travel patterns will be undertaken within six months of occupation of the building and these will be used to derive future targets, with the general aim being to reduce single-occupancy car trips by 5 percentage points by the fifth year of operation of the plan. Monitoring surveys will then be carried out one, three and five years after occupation to assess progress towards the targets.
88. The submitted Travel Plan submitted falls below the TFL threshold for requiring a full Travel Plan. Therefore it has been recommended to secure a Travel Plan Statement via a planning condition.

Sustainability

89. The applicant has provided an Energy and Sustainability Statement to address major development sustainability requirements.
90. The proposed regulated development with 'Be Lean', 'Be Clean' and 'Be Green' measures incorporated within the residential part of the development is confirmed a 59.05% reduction on the minimum Building Regulations (2013) as required within the London Plan. A carbon offset payment is required to achieve the zero carbon goal. 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 need to be secured through the Section 106 agreement for both carbon off set for the residential and commercial uses, in line with the emerging London Plan Policy S12 . Any future section 106 should include a sustainability strategy to cover overheating analysis. The results of the assessment of suitable technologies relative to the nature, locations and type of development suggest that the most suitable solution to meeting reduction in CO2 emissions would be via the use of a communal heat pump system to provide the heating and hot water for the building. The Sustainability Officer requested conditions for additional information regarding the installed water using strategies.
91. Policy BSUI1 of the emerging local plan states that non residential developments should achieve a BREEAM rating of "Excellent". A condition is recommended relating to this.

Environmental Health

Noise

92. The site is subject to medium to high levels of noise (traffic, trains, some commercial activity) that can be mitigated by careful design of sound insulation, glazing and acoustic trickle vents. The Environmental Officer requested that the condition for any potential plant to be in accordance with BS4142:2014 requirements.

Air Quality

93. The proposed site is within an air quality management area and therefore due to the size of the development the applicant is required to carry out an air quality impact assessment that should consider the potential emissions to the area associated with the development as well as the potential impact on receptors to the development. The applicant has provided an air quality assessment and air quality neutral assessment undertaken by EB7Ltd. This assessment methodology is accepted along with the conclusions and therefore no mitigation measures are required and the development meets the air quality neutral criteria. Therefore, no conditions are recommended in relation to air quality.

Construction Noise and Dust

94. The development is within an Air Quality Management Area and located very close to other residential and commercial premises. Demolition and construction therefore has the potential to contribute to

background air pollution levels and cause nuisance to neighbours. The following information is therefore recommended to minimise the impact on local air quality and protect the amenity of neighbours during construction.

95. Prior to the commencement of the development a Construction Method Statement shall be submitted to and agreed by the Local Planning Authority outlining measures that will be taken to control dust, noise and other environmental impacts of the development.

Contamination Land

96. The site to be redeveloped will include residential accommodation. Due to the previous uses of the area a soil contamination reports have been requested.

97. The quality of imported soil must be verified by means of in-situ soil sampling and analysis. We do not accept soil quality certificates from the soil supplier as proof of soil quality. Details of contamination, remediation and verification have been conditioned.

Lighting

98. The proposed site will contain a mixture of commercial use and residential use therefore there needs to be a lighting strategy to ensure that there is no light intrusion affecting residential properties. Further details regarding lighting have been requested via a condition also considering potential overspill lighting on to the wildlife corridor.

Tree Consideration

99. A tree report was submitted with the application. The Tree Officer raised no objection to the scheme or the loss of T1 Ash. The trees within the vicinity of the application site are of low quality and will not be affected by the proposals.

100. One tree, located on the western site boundary, was identified as having an impact on the proposed development. A proposed tree plan, complete with removal recommendations has been proposed for the development. The draft tree protection plan can be seen in Appendix 2 of this report. Overall the proposed development would not result in and any harm to the trees on or surrounding the application site. The proposal would result in tree planting to the front of the proposed new build with additional soft landscaping. Details of the proposed landscape strategy have been recommended as a condition.

Ecology and Biodiversity

101. The northern portion of the site has been designated as a wildlife corridor. DMP8 wildlife corridors will be protected from development which would compromise its biodiversity or recreational function.

102. An Ecological Appraisal was submitted with the application. The site was subjected to a search for designated sites within a 2km radius of the site. Direct impacts on nearby designated sites as a result of the proposed development are considered highly unlikely given the application site lies 1.53km from the nearest designated site, which is designated for its ancient woodland habitat. Furthermore the habitats within the red line boundary have been evaluated as having limited site value.

103. The report concluded that a mitigation/enhancement measures should be secured as part of any forthcoming planning consent, including:

- conduct works outside of breeding bird season which runs March-September inclusive, unless a pre works check of the northern boundary vegetation should be conducted by an ecologist prior to works
- Incorporating bat and bird boxes
- Direct lighting away from the northern boundary.
- Enhanced landscaping including native species
- Mitigation measures for hedgehogs, reptiles and badgers

104. The above mitigation and site enhancements has been secured via a planning condition.

Flood Risk and Drainage Considerations

105. Thames Water were consulted during the course of the application and raised no objections to the development. A Piling Method Statement was requested via a planning condition. A flood risk report was submitted with the application and clarifies that the site is located within Flood Zone 1. The findings of this report demonstrates that the proposed development will not increase surface water flows or increase flood risk at the site or elsewhere. This proposed development will greatly reduce the surface water run off leaving the site, and therefore reduce flood risk at the site and elsewhere.

106. All hard standing areas will be formed of porous surfacing. The surface water run off from the sloped hard standing areas will be caught by slot drains. The over flows from the roof areas and sloped hard standing areas will then be conveyed in to an attenuation tank which will restrict the flow leaving the site. Following the development at this site, the peak flow rate of surface water will be reduced from 26.5 l/s for a 1 in 1 year storm event to 1.951 l/s, and from 84.0 l/s for a 1 in 100 year storm event, also to 1.951 l/s.

Equalities

107. 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

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 Section 106 Agreement.

CIL DETAILS

This application is liable to pay **£615,842.10** * 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): 712 sq. m.

Total amount of floorspace on completion (G): 2831 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	2170		1624.24	£200.00	£0.00	£484,372.26	£0.00
(Brent) Businesses and light industry	661		494.76	£0.00	£0.00	£0.00	£0.00
(Mayoral) Businesses and light industry	661		494.76	£0.00	£60.00	£0.00	£30,696.42
(Mayoral) Dwelling houses	2170		1624.24	£0.00	£60.00	£0.00	£100,773.42

BCIS figure for year in which the charging schedule took effect (Ic)	224	323
BCIS figure for year in which the planning permission was granted (Ip)	334	
TOTAL CHARGEABLE AMOUNT	£484,372.26	£131,469.84

*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: 20/1151

To: Mr Gunne-Jones
Planning & Development Associates
118 Pall Mall
London
SW1Y 5ED

I refer to your application dated **11/04/2020** proposing the following:

Partial demolition of the existing buildings and structures, the erection of a 'co-location' scheme ranging in height from 2 to 7 storeys, incorporating industrial floorspace with residential units, together with associated landscaping, vehicular access arrangements, car and cycle parking, servicing and refuse and recycling facilities.

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

at **All Units at Dowlings Parade, HNS Autos and Delta Hand Car Wash, Bridgewater Road, Wembley, HA0 1AJ**

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 proposed development is in general accordance with policies contained in the:-
National Planning Policy Framework 2019
London Plan 2016
Brent Core Strategy 2010
Brent Development Management Policies 2016
Draft London Plan
Draft Local Plan

- 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):

252 S 001 Rev. C, 252 S 002 Rev. A, 252 S 003 Rev. A, 252 PA. 003, 252 P 001 Rev. B, 252 P 002 Rev. D, 252 P 003 Rev. D, 252 P 004 Rev. D, 252 P 005 Rev. D, 252 P 006 Rev. D, 252 P 007 Rev. C, 252 P 008 Rev. C, 252 P 009 Rev. C, 252 P 010 Rev. D, 252 P 011 Rev. B, 252 P 012 Rev. B, 252 P 013 Rev. C

Information Submitted: _

Design and Access Statement prepared by MTP

Planning Statement prepared by PDA

Framework Travel Plan prepared by ADL Traffic and Highways Engineering Ltd

Flood Risk Assessment and SUDS Report prepared by Nimbus

Air Quality Assessment conducted by EB7 Ltd

Acoustic Assessment prepared by Ned Johnson Acoustic Consultants Limited

Transport Statement prepared by ADL Traffic and Highways Engineering Ltd

Arboricultural Impact Assessment prepared by Brindle and Green

Ecological Assessment prepared by Brindle and Green

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

- 3 The residential units hereby approved shall at no time be converted from C3 residential to a C4 small HMO, notwithstanding the provisions of Schedule 2 Part 3

Class L of the Town and Country Planning (General Permitted Development) Order 2015 (or any order revoking and re-enacting that Order) without express planning permission having first been granted by the Local Planning Authority.

Reason: To ensure that an adequate standard of accommodation is maintained in all of the residential units and in view of the restricted space within the site to accommodate additional bin or cycle storage.

- 4 The non-residential floorspace hereby approved shall not be used other than for purposes within Use Class Class B1(b) or B1(c) (Use Class E(g)(i) or E(g)(ii) from September 2020) and shall not be used for any other purpose, notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 (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 (or any order revoking and re-enacting that Order with or without modification) unless planning permission has been granted for the alternative use by the Local Planning Authority.

Reason: To ensure the retention of industrial floorspace on the site.

- 5 The scheme hereby approved shall contain 28 residential units as detailed in the drawings hereby approved, unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of proper planning.

- 6 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 DMP1 and London Plan policies 5.3 and 7.14.

- 7 Units 6, 7 and 12 shall be constructed so that 90% of the residential units will comply with Building Regulations M4(2) 'accessible and adaptable homes' standards and 10% will comply with M4(3) 'wheelchair accessible homes' standards.

Reason: To ensure the provision of accessible homes, in accordance with the Mayor's Housing SPG 2015.

- 8 Prior to the commencement of the development a Construction Method Statement

(CMS) shall be submitted to and approved 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 CMS shall include details of a dust monitoring plan, to be implemented during construction and demolition works.

All agreed actions shall be carried out in full.

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

Reason for pre-commencement condition: These impacts can arise at any time from the start of construction works, and adequate controls need to be in place at this time.

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

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

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

Reason for pre-commencement condition: Construction traffic impacts can arise at any time from the commencement of works, and adequate controls need to be in place from this time.

- 10 Prior to commencement of development, details of the following shall be submitted to and approved in writing by the Local Planning Authority (in consultation with London Underground):

A detailed design and method statements for each state of the development for all of the demolition, foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:

- provide details on all structures
- written approval from London Underground will be required prior to commencement of any works
- provide drainage strategy
- provide details on the use of tall plant/scaffolding
- accommodate the location of the existing London Underground structures

- there should be no opening windows or balconies facing the LU elevation
- demonstrate access to elevations of the building adjacent to the property boundary with London Underground can be undertaken without recourse to entering our land
- demonstrate that there will at no time be any potential security risk to our railway, property or structures
- accommodate ground movement arising from the construction thereof
- and mitigate the effects of noise and vibration arising from the adjoining operations within the structures and tunnels

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2015 Table 6.1 and Land for Industry and Transport Supplementary Planning Guidance 2012.

11 Following the demolition of the buildings and prior to the commencement of building works:

- 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 + A2:2017 and the Environment Agency's current Land Contamination Risk Management Guidance.
- A report shall be submitted to the Local Planning Authority, 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.
- The written report shall be approved in writing by the Local Planning Authority.

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

12 Following the demolition of the buildings and prior to the commencement of building works:

A Travel Plan Statement for the site based upon the Framework Travel Plan shall be submitted to and approved in writing by the Local Planning Authority and the approved plan shall thereafter be implemented from first occupation of the development.

Reason: In the interest of the free and safe flow of traffic on the highway network.

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

- (a) Details of materials for all external surfaces of the building
- (b) Details of the proposed security gates on the ground floor
- (c) Details of screening to be installed on all proposed balconies
- (d) Details of screening linked to the proposed roof terrace areas

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.

- 14 Within 6 months of commencement of works further details of soft and hard landscaping shall be submitted to and approved in writing by the local planning authority:

- (a) hard surfacing, any external furniture and play equipment, and boundary treatments throughout the site, including samples which shall be made available for viewing on site or in another location as agreed.
- (b) details of soft landscaping (including species, location and densities) together with design of tree pits for trees planted within the site.
- (c) details of any external CCTV.
- (d) details of proposed external lighting design to ensure that all external areas are adequately lit in hours of darkness, including a light spillage plan taken into consideration the wildlife corridor.
- (e) arrangements for maintenance of trees and other planted species.

The hard and soft landscape works shall be carried out in full accordance with the as approved details prior to the use of the building hereby approved, unless alternative timescales have been submitted to and approved to be agreed in writing by the Local Planning Authority and the works shall thereafter be carried out in accordance with the approved timescales.

- 15 Prior to occupation details of any plant, which shall be in accordance with BS4142:2014, shall be submitted to and approved in writing by the Local Planning Authority and the plant shall not be installed other than in accordance with the approved details.

Reason: To ensure appropriate noise levels are achieved.

- 16 Prior to first occupation or use of the development.

Any soil contamination remediation measures required by the Local Planning Authority shall be carried out in full. A verification report shall be provided to 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 Local Planning Authority has previously confirmed that no remediation measures are required). The verification report shall be approved in writing by the Local Planning Authority.

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

- 17 Prior to first occupation details shall be provided and approved in writing of the installed water using facilities meeting the target consumption of 105litres/person/day and this shall maintained for the lifetime of the development.

Reason: To ensure that the development meets water target consumption rates.

- 18 Prior to first occupation of the proposed workspace, a Delivery and Servicing Plan shall be submitted to and approved in writing by the Local Planning Authority and the approved plan shall thereafter be implemented from first occupation of the development. The Delivery and Servicing Plan shall have regard to TfL guidance regarding Delivery and Servicing Plans.

Reason: To ensure the on-going sustainability of the development, in accordance with emerging London Plan Policy D4. In the interest of the free and safe flow of traffic on the highway network.

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

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

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 applicant is advised to contact London Underground Infrastructure Protection in advance of preparation of final design and associated method statements, in particular with regard to: demolition; drainage; excavation; construction methods; tall plant and scaffolding.
- 3 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
- 4 Given the age of the building to be demolished it is possible that asbestos may be present. The applicant should be reminded of their duties under the Control of Asbestos Regulations and must ensure that a qualified asbestos contractor is employed to remove all asbestos and asbestos-containing materials and arrange for the appropriate disposal of such materials.
- 5 The quality of imported soil must be verified by means of in-situ soil sampling and analysis. We do not accept soil quality certificates from the soil supplier as proof of soil quality.
- 6 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.
- 7 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 Denis Toomey, Planning and Regeneration, Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ, Tel. No. 020 8937 1620