

## Agenda Item 03

### Supplementary Information Planning Committee on 9 September, 2020

Case No. 20/0587

Location 1,2,3 & 9 Watkin Road, Wembley, HA9 0NL  
 Description Demolition of existing buildings and erection of 1x part-20, part-17 storey building and 1x 14 storey building together containing 174 residential units; commercial floor space (B1a and B1c use class) on ground, first and second floors; car and cycle parking, refuse storage, amenity space and associated landscaping.

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Clarification on consultation and its implications for officers' recommendation

The most recent site notice was erected on the 11th August (following previous site notices put up on 19 March and 4 August) following a minor change to the "red line" for the application. The 21 day statutory consultation period for this site notice therefore ended on 1 September. However, it has been found that the site notice specifies that comments may be made until 10<sup>th</sup> September (30 days after it was put up) due to a technical error. This is the day following the committee meeting. As such, the statutory consultation requirements have been met. However, it is possible that someone may have viewed the most recent site notice and the specified date for comments.

The consultation on this application has been live since February and the consultation in question has only resulted from the applicant making a small reduction in the extent of the application site area. Other drawings or supporting documents did not change. As such, Officers consider that it is appropriate to proceed with the presentation of this item at the 9<sup>th</sup> September planning committee meeting and that the resolution made by committee is on the basis that the application is presented to a later planning committee meeting for further consideration should any representations be received on 10 September which, in the view of the Head of Planning and Development, have not been addressed in the committee report or at the committee meeting and would fundamentally affect the resolution reached by the committee and could reasonably have led to a different decision having been reached by the committee.

Additional representation #1

On the 1st September 2020 an additional objection was received from a business occupier along Watkin Road. This occupier had previously objected and this did not increase the overall number of objections to the development by address. The grounds of objection are reported and addressed below:

Ground of objection	Officer Response
With reference to the proposals to tree line the road, Watkin Road is a busy light industrial work place that would not have trees but this just goes to show that the overall plan is formed in such a way as to just look pretty.	It is agreed that it would not be unusual for a light industrial area to not be tree lined. Nonetheless, the lack of trees/greenery at present means that the proposal to introduce trees/landscaping as part of the introduction of a residential use at the site would result in a significant uplift in tree cover and urban greening as has been set out in the report.
The Site 3.1 (2906-WKR-DAS-MLIND)- Plan is incorrect as it shows a very old street plan.	This plan is for the purposes of identifying the location of the site only. The main location plan submitted with the application sets out the existing site accurately.
Consultation shows it has included 430+ flats in Scape house to owner/occupiers. This building is student accommodation hence it has no owners and as of COVID 19 no occupiers. This has also been shown to include other student accommodation which would also	Statutory consultation with surrounding premises has been undertaken and has been reported within the committee report.

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not have had occupiers.	
<p>Application refers to a site that is just under 0.2 hectares which must include the public road and pavement to calculate the size as the red outline includes this area. They are in fact two separate developments on either side of the road.</p> <p>The 998sqm commercial floor space amounts to less than 0.1 hectares.</p>	<p>It is correct that the entirety of the red line site area (inclusive of the public highway) amounts to a figure just shy of 0.2 hectares.</p> <p>Where the size of the site is a relevant consideration for planning assessment (e.g. at paragraph 4 of the committee report), the size of the site omitting the public highway (0.161 hectares) has been used for assessment purposes.</p> <p>The 998sqm (GIA) represents an uplift on the existing employment generating floor space. The 1,155sqm (GEA) represents more than 65% of the site area (excluding the public highway) and therefore meets policy requirements.</p>
<p>Watkin Road is a very busy industrial no-through road. To have the pavement removed at the entry end for disabled parking and a delivery layby is ridiculous as it would force pedestrians to go into the road as social distancing would not be possible and not safe.</p>	<p>This is addressed at para 140 – 144 of the committee report.</p>
<p>The towering buildings would be the start of the redevelopment of Watkin Road which would result in a terrible canyon effect. The whole site should be considered comprehensively.</p>	<p>The acceptability of a developments are considered on the basis of their own merits.</p> <p>The height and massing considerations are discussed at paragraphs 43 – 49 of the committee report.</p>

## Additional representation #2

On the 4th September 2020 an additional representation was received from Quintain Ltd, raising the following concerns which relate directly to discussion at paragraphs 85 and 86 of the committee report:

*As stated in our initial representations, at paragraph 7.63 the Daylight, Sunlight and Overshadowing Report (February 2020) produced by Avison Young states that with the proposed development in place **“the levels of VSC on the lower levels directly opposite the site would reduce to 12%-20%”**. We questioned the accuracy of this statement as the 3d model images included in the report suggested the impact would be more severe. Having now reviewed the detailed supplemental results submitted by the applicant (dated 22 August) these appear to confirm our view. The supplemental information confirms that only 9 of the 85 windows assessed in Plot NE05 achieve a VSC of 12% or higher and the highest level achieved is only 18.17%. The majority of windows (58) achieve a VSC of lower than 10% and the average for windows within the façade is 7.58%. The applicant does not comment upon the differences between the detailed results and their original statement at paragraph 7.63 of the submitted report, which I presume will be listed on the decision notice as an approved document. We would therefore we would welcome further clarification from the applicant on this point.*

The applicant's daylight and sunlight consultant (Avison Young) has since responded to this representation with the following:

1. The VSC façade assessment used in the original DSO (daylight/sunlight/overshadowing) report is indicative, as stated in the report:

- VSC does not provide a proper indication of likely levels of daylight amenity within a space. ADF analysis is far better in this regard.
- As the Quintain block facing us on Watkin Road is in outline, Avison Young ran an indicative façade assessment, and stated that in our opinion and in our experience, acceptable levels

of daylight amenity could be achieved (as now confirmed).

- Factors which influence daylight amenity within a space include: windows sizes, glazing ratios, head heights; floor to ceiling heights; room proportions; room uses; the floor, ceiling, wall finishes used - each of which are considered in an ADF assessment.
- In contrast - none of these factors are considered in a VSC assessment.

A VSC assessment simply estimates the proportion of sky visibility available, taken at the centre point of a window.

- The VSC calculation does however form part of the ADF assessment formula.

2. The VSC façade assessment in the original DSO report did not include balconies. The detailed assessment does. Therefore it is not surprising that the VSC levels reduce in the recent detailed analysis, when compared to indicative VSC façade analysis quoted in the original DSO report. Balconies further reduce a view of the sky dome from the calculation point (i.e. centre of the window serving the room that is being assessed).

3. Avison Young have used the same set of ADF formula as that used in support of the Quintain Masterplan.

4. Avison Young have used layouts and elevational treatments obtained from consented blocks in the Quintain Masterplan.

5. The detailed ADF analysis recently submitted illustrates that despite lower levels of VSC (with balconies), the ADF levels within the Quintain scheme are consistent with daylight levels considered acceptable in the local Watkin Road context, and within the Quintain masterplan itself.

6. In consideration of the above – in our opinion the recent detailed ADF analysis should now outweigh the indicative VSC façade analysis undertaken against the outline consented massing in the Quintain scheme. The ADF analysis provides a far better indication of the levels of daylight amenity that will be achieved within the Quintain Masterplan, using the reasonable flat layouts and elevational treatment adopted in our analysis, which mirrors those used within Quintain's own consented masterplan. This analysis finds that the retained levels of daylight amenity will be consistent with those found in the immediate context of Watkin Road and within Quintain's own masterplan; irrespective of the levels of VSC illustrated/quoted in the indicative VSC façade assessment, which in isolation is not an appropriate method to determine the likely levels of daylight amenity within the outline block facing the Proposed Development.

As set out in the main report, given the location and context of the site and the density of development that is envisaged within this area, the proposal is considered to result in an acceptable level of impact on the levels of daylight and sunlight.

#### Additional condition

Since publishing the committee report, Brent's Regulatory Services officers have recommended an additional condition in relation to the implementation of the applicant's air quality assessment. The additional condition would impose limitations on the use of a diesel generator for the development to ensure an acceptable air quality impact. The condition will require that diesel generators are only used in an emergency and that the main source of heating is therefore through the air source heat pumps. The condition will further require that diesel generators are only to be used in an emergency or during the testing period; once a month for 10 minutes and 1 test per year for 2 hours. Testing should be undertaken when the wind direction is not towards the South block.

#### Points of clarification and correction in relation to the committee report

- On page 17 of the committee reports pack, one of the 'amendments since submission' specifies that the long term cycle parking spaces in the south block have been altered to so that c.35% of the spaces would have 450mm spacings. It is to be clarified that the amendments have actually seen alterations so that c.68% of the spaces would have 450mm spacings.

- Below paragraph 160 in the committee report, it is set out that some additional information has been requested from the applicants by the GLA in respect of energy and sustainability measures. It has since been clarified that the GLA are now satisfied with the energy and sustainability submissions and would not likely

require further information ahead of a Stage 2 referral.

**Recommendation: That the committee resolve to grant consent, subject to referral to the Mayor of London for his Stage 2 decision, and subject to the Section 106 Heads of Terms and conditions set out in the committee report and draft decision notice (subject to an additional condition relating to the use of diesel generators), with the resolution made on the basis that the application is presented to a later planning committee meeting for further consideration meeting further representations are received on 10 September which, in the view of the Head of Planning and Development, have not been addressed in the committee report or at the committee meeting and would fundamentally affect the resolution reached by the committee and could reasonably have led to a different decision having been reached by the committee.**

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