

# COMMITTEE REPORT

Planning Committee on  
Item No  
Case Number

13 January, 2021  
05  
18/3498

## SITE INFORMATION

|                      |  |
|----------------------|--|
| <b>RECEIVED</b>      | <b>5 September, 2018</b>   |
| <b>WARD</b>          | <b>Dudden Hill</b>   |
| <b>PLANNING AREA</b> |  |
| <b>LOCATION</b>      | <b>Land at 370 High Road and 54-68 Dudden Hill Lane, London, NW10</b>  |
| <b>PROPOSAL</b>      | Demolition of existing buildings and erection of 5 mixed use blocks ranging from 4 to 10 storeys plus basement levels, comprising; 245 residential units at 1st to 9th floors, and light industrial floorspace (Class B1c), food retail floorspace (supermarket) (Class A1), gym (Class D2), nursery (Class D1), commercial units (units 7 and 9) (flexible use for Class A1, A2, A3, D1 and/or B1c) and HA office (Class B1a) at basement, ground and part 1st floors, together with associated vehicular access, car and cycle parking spaces, bin stores, plant room, substations, landscaping and amenity space (Amended description)  |
| <b>PLAN NO'S</b>     | <p>1123-A-P-001 Site Location Plan<br/>11123-A-P-010 Existing Ground Floor<br/>11123-A-E-020 Existing Dudden Hill Lane Elevation<br/>11123-A-E-021 Existing Colin Road Elevation<br/>11123-A-E-022 Existing High Road Elevation</p> <p>11223-A-P-101 Rev R - Ground floor plan<br/>11223-A-P-102 Rev P - First floor plan<br/>11223-A-P-101 Rev O - Second floor plan<br/>11223-A-P-104 Rev M - Third floor plan<br/>11223-A-P-105 Rev M - Fourth floor plan<br/>11223-A-P-106 Rev M - Fifth floor plan<br/>11223-A-P-107 Rev M - Sixth floor plan<br/>11223-A-P-108 Rev M - Seventh floor plan<br/>11223-A-P-109 Rev K - Eighth floor plan<br/>11223-A-P-110 Rev G - Ninth floor plan<br/>11223-A-P-111 Rev C - Roof plan</p> <p>11223-A-E-140 Rev F - Elevations Y and Z<br/>11223-A-E-141 Rev F - Elevations X and Y<br/>11223-A-E-142 Rev E - Elevations V and U<br/>11223-A-E-143 Rev E - Elevations S and T<br/>11223-A-E-144 Rev D - Elevations Q and R</p> <p>11223- A-S-122 Rev H - Sections U and V<br/>11223- A-S-121 Rev E - Sections U and V<br/>11223- A-S-120 Rev D - Sections Y and Z</p> <p>11123-A-P-201 Flat Type 01<br/>11123-A-P-202 Rev A Flat Type 02<br/>11123-A-P-203 Flat Type 03<br/>11123-A-P-204 Rev A Flat Type 04</p> |

|                     |              |
|---------------------|--------------|
| 11123-A-P-205       | Flat Type 05 |
| 11123-A-P-206       | Flat Type 06 |
| 11123-A-P-211 Rev A | Flat Type 11 |
| 11123-A-P-212 Rev A | Flat Type 12 |
| 11123-A-P-213       | Flat Type 13 |
| 11123-A-P-214       | Flat Type 14 |
| 11123-A-P-215       | Flat Type 15 |
| 11123-A-P-216       | Flat Type 16 |
| 11123-A-P-220       | Flat Type 20 |
| 11123-A-P-221 Rev A | Flat Type 21 |
| 11123-A-P-222 Rev B | Flat Type 22 |
| 11123-A-P-223 Rev A | Flat Type 23 |
| 11123-A-P-224 Rev A | Flat Type 24 |
| 11123-A-P-225 Rev A | Flat Type 25 |
| 11123-A-P-226 Rev A | Flat Type 26 |
| 11123-A-P-227 Rev B | Flat Type 27 |
| 11123-A-P-228       | Flat Type 28 |
| 11123-A-P-229 Rev A | Flat Type 29 |
| 11123-A-P-230       | Flat Type 30 |
| 11123-A-P-232       | Flat Type 32 |
| 11123-A-P-233       | Flat Type 33 |
| 11123-A-P-234       | Flat Type 34 |
| 11123-A-P-236       | Flat Type 36 |
| 11123-A-P-237       | Flat Type 37 |
| 11123-A-P-238       | Flat Type 38 |
| 11123-A-P-239 Rev A | Flat Type 39 |
| 11123-A-P-240 Rev A | Flat Type 40 |
| 11123-A-P-241 Rev B | Flat Type 41 |
| 11123-A-P-242 Rev A | Flat Type 42 |
| 11123-A-P-243 Rev A | Flat Type 43 |
| 11123-A-P-244       | Flat Type 44 |
| 11123-A-P-245       | Flat Type 45 |
| 11123-A-P-245       | Flat Type 45 |
| 11123-A-P-246       | Flat Type 46 |
| 11123-A-P-247       | Flat Type 47 |
| 11123-A-P-248 Rev A | Flat Type 48 |
| 11123-A-P-249 Rev A | Flat Type 49 |
| 11123-A-P-250 Rev B | Flat Type 50 |
| 11123-A-P-251       | Flat Type 51 |
| 11123-A-P-252       | Flat Type 52 |
| 11123-A-P-253 Rev A | Flat Type 53 |
| 11123-A-P-254 Rev A | Flat Type 54 |
| 11123-A-P-255       | Flat Type 55 |
| 11123-A-P-256       | Flat Type 56 |
| 11123-A-P-257       | Flat Type 57 |
| 11123-A-P-258       | Flat Type 58 |
| 11123-A-P-259       | Flat Type 59 |
| 11123-A-P-260 Rev A | Flat Type 60 |
| 11123-A-P-261 Rev A | Flat Type 61 |
| 11123-A-P-262       | Flat Type 62 |
| 11123-A-P-263 Rev A | Flat Type 63 |
| 11123-A-P-264 Rev A | Flat Type 64 |
| 11123-A-P-265 Rev A | Flat Type 65 |
| 11123-A-P-266 Rev A | Flat Type 66 |
| 11123-A-P-267 Rev B | Flat Type 67 |
| 11123-A-P-268       | Flat Type 68 |
| 11123-A-P-269       | Flat Type 69 |
| 11123-A-P-270       | Flat Type 70 |
| 11123-A-P-271       | Flat Type 71 |
| 11123-A-P-272       | Flat Type 72 |
| 11123-A-P-273       | Flat Type 73 |
| 11123-A-P-274       | Flat Type 74 |
| 11123-A-P-275       | Flat Type 75 |

|                     |               |
|---------------------|---------------|
| 11123-A-P-276       | Flat Type 76  |
| 11123-A-P-277       | Flat Type 77  |
| 11123-A-P-278 Rev A | Flat Type 78  |
| 11123-A-P-279       | Flat Type 79  |
| 11123-A-P-280       | Flat Type 80  |
| 11123-A-P-281       | Flat Type 81  |
| 11123-A-P-282       | Flat Type 82  |
| 11123-A-P-283       | Flat Type 83  |
| 11123-A-P-284       | Flat Type 84  |
| 11123-A-P-285       | Flat Type 85  |
| 11123-A-P-292       | Flat Type 92  |
| 11123-A-P-296       | Flat Type 296 |
| 11123-A-P-297       | Flat Type 297 |
| 11123-A-P-298       | Flat Type 298 |
| 11123-A-P-299       | Flat Type 299 |
| 11123-A-P-300       | Flat Type 300 |
| 11123-A-P-301       | Flat Type 301 |
| 11123-A-P-302       | Flat Type 302 |
| 11123-A-P-303       | Flat Type 303 |
| 11123-A-P-304       | Flat Type 304 |
| 11123-A-P-305       | Flat Type 305 |
| 11123-A-P-306       | Flat Type 306 |
| 11123-A-P-307       | Flat Type 307 |
| 11123-A-P-308       | Flat Type 308 |
| 11123-A-P-309       | Flat Type 309 |
| 11123-A-P-310       | Flat Type 310 |
| 11123-A-P-311       | Flat Type 311 |
| 11123-A-P-312       | Flat Type 312 |

**LINK TO DOCUMENTS  
ASSOCIATED WITH  
THIS PLANNING  
APPLICATION**

**When viewing this on an Electronic Device**

**Please click on the link below to view ALL document associated to case**

[https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=DCAPR\\_141724](https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=DCAPR_141724)

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**Please use the following steps**

1. Please go to [pa.brent.gov.uk](https://pa.brent.gov.uk)
2. Select Planning and conduct a search tying "18/3498" (i.e. Case Reference) into the search Box
3. Click on "View Documents" tab

## RECOMMENDATIONS

It is recommended that the planning committee resolve to refuse planning permission for the reasons stated below and set out within the draft decision notice and subject to stage 2 referral to the Mayor of London.

- 1) That the proposal would fail to deliver the maximum reasonable number of Affordable Rented homes
- 2) That the proposal would result in a significant impact on the light received by some nearby residents
- 3) That the proposal would include the provision of excessive levels of retail parking without proposing adequate measures to promote non-car access
- 4) That, in the absence of a legal agreement (as the scheme is recommended for refusal), the development would not secure obligations require to mitigate the impacts of the development including:
  - Sustainability measures;
  - Job and training opportunities for local residents;
  - Necessary highway improvement works;
  - Necessary pedestrian environment improvement works;
  - A travel plan, inclusive of car club measures;
  - Sufficient affordable workspace through the incorporation of appropriate safeguarding mechanisms;
  - Necessary contributions towards amendments to the spaces within the controlled parking zones and removal of rights for parking permits for future residents and business users;
  - Necessary contributions towards the local public transport capacity and accessibility.
  - Necessary contributions towards local play provision
  - Affordable housing

That the Head of Planning is delegated authority to issue the decision notice and impose informatives pursuant to the following matters:

### Informatives

- CIL liability

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 informatives or to vary the reason for the refusal) 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.

## SITE MAP

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|  <b>Brent</b> | <b>Planning Committee Map</b>  |
|  | Site address: Land at 370 High Road and 54-68 Dudden Hill Lane, London, NW10<br><br>© Crown copyright and database rights 2011 Ordnance Survey 100025260 |

This map is indicative only.



## PROPOSAL IN DETAIL

Demolition of existing buildings and erection of 5 mixed use blocks ranging from 4 to 10 storeys plus basement levels, comprising; 245 residential units at 1st to 9th floors, and light industrial floorspace (Class B1c), food retail floorspace (supermarket) (Class A1), gym (Class D2), nursery (Class D1), commercial units (units 7 and 9) (flexible use for Class A1, A2, A3, D1 and/or B1c) and HA office (Class B1a) at basement, ground and part 1st floors, together with associated vehicular access, car and cycle parking spaces, bin stores, plant room, substations, landscaping and amenity space (Amended description)

## EXISTING

The site has an area of 0.93 hectares and is bounded by the Sapcote Trading Centre to the north, Colin Road to the south, Dudden Hill Lane to the east and High Road to the west. The site is currently occupied by a number of industrial units including a heavy plant hire business, storage facilities for haulage equipment and scaffolding and a MOT station/Used car sales garage. There are three retail units located on the southern side of the site adjacent to the Colin Road/High Road junction. A tyre garage located on Colin Road that does not form part of the site proposal. The surrounding area contains industrial units to the north, an undesignated shopping parade to the east and south and residential properties to the east, west and south. The site is also located within a Locally Significant Industrial Site (LSIS).

Residential units in the form of two storey terraced properties are located on the southern boundary of the site on Colin Road. Residential properties are also found along Dudden Hill Lane and High Road. The height of the buildings in the area is generally two/three storeys however there are a number of examples of taller buildings located to the west on the approach to Church End and to the north-east on Dudden Hill Lane. The site is not located within a conservation area and does not contain any listed buildings. The site has a Public Transport Accessibility Level (PTAL) of 5 with Dollis Hill underground station located approximately 160 metres to the north-east and regular bus services to Church End, Neasden and Willesden.

## SUMMARY OF KEY ISSUES

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

**Representations received** - 24 supporting comments and 23 objections were received as well as one objecting petition (containing 12 names) and one neutral comment were received following two rounds of public consultation. It is considered that the proposal does not accord with planning policy, and would fail to deliver the degree of benefits necessary to outweigh the harm.

**Principle of use** - The forms part of site allocation (BSSA4) which is considered suitable for co-location development. The site is currently occupied by warehouses and workshops and the proposal would re-provide industrial floorspace whilst also providing 245 new homes and further retail, commercial and community floorspace.

**Affordable homes / unit mix** - The proposal would deliver 65% affordable housing with the tenure split weighted heavily towards Shared Ownership (35:65 by habitable room and 32:68 by unit). However, the development would not deliver the maximum reasonable amount of London Affordable Rented units. The unit mix includes 18% family housing of which 24 of the 43 provided would be within the London Affordable Rented tenure. Having regard to this and the impact that the provision of additional private family sized homes on Affordable Housing provision, the provision is considered acceptable.

**Design** – The design is considered to be of a high quality and although the scale would be a departure from the two storey terraced buildings that characterise the wider area, the scale has been staggered in order to better respect surrounding context and is considered to be appropriate in this instance.

**Quality of accommodation** – The proposed accommodation would be of good quality size and layout, consistent with London Plan standards, with good access to light, outlook, whilst there is shortfall in amenity space, the provision of a public space within the site and the proximity to nearby public open spaces is considered to mitigate the identified shortfall.

**Neighbour amenity** – The scale of the development would result in significant daylight impacts to some of the neighbouring properties, and the benefits of the scheme aren't considered sufficient in this particular instance to outweigh the harm associated with the impacts.

**Highways** – The development would provide parking for the supermarket well in excess of standards, without an appropriate pricing regime to encourage non-car access, which would encourage additional unnecessary car journeys to and from the site and from the area in general.

**Trees, landscaping and public realm** – There are no existing mature or protected trees that would be affected by the proposed development. Soft landscaping would be provided at ground floor level primarily in the form of trees and green walls and the proposal would represent a significant improvement in terms of both the landscaping on the site and the quality of the public realm.

**Environment and sustainability** – Consideration has been given to ecology and the sustainable development of the proposals and the proposal is considered to accord with policy.

**Weighing of benefit and harm** – the proposal would deliver a significant number of notable benefits including the provision of new homes, including a high overall number of Affordable homes, Affordable workspace and significant improvements to the public realm and the quality of buildings and spaces on the site. However, while those benefits are acknowledged, there are a number of divergences from policy and guidance, including the under-provision of London Affordable Rented homes. In this instance, the benefits are not considered to outweigh the harm.

**RELEVANT SITE HISTORY**

None of relevance

**CONSULTATIONS**

2 rounds of consultation were carried out commencing on 17/09/2018 on receipt of the original application and again on the 02/07/2020 following the receipt of amended plans. 1876 neighbouring properties have been notified and at the time of writing this report 24 supporting comments and 23 objections were received as well as one objecting petition (containing 12 names) and one neutral comment. The following tables summarise the objections to the scheme

| <b>Objection</b>  | <b>Response</b>   |
|---|---|
| Development due to scale, form and materials would be out of keeping with the character of the area which consists of low rise houses/shops             | Discussed in main body of the report.   |
| 258 new properties housing approximately 800 residents would overwhelm the area   | The site is within an accessible location with access to shops, services and public transport connections. The CIL collected to the development would go towards local infrastructure improvements. |
| No provision is made for the infrastructure required to support this number of new residents to ensure sufficient school places or GP health facilities | The development is CIL liable meaning monies would be collected which would be put back into the provision of local infrastructure development.   |
| Plans only provide 66 car parking spaces for 258 flats which is grossly deficient   | With the exception of disabled parking, there would be no residents car parking with the  |

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|   | <p>residents subject to a car free agreement prevent future residents from obtaining parking permits. Within areas that are accessible to public transport "parking permit restricted" developments are encouraged.</p>  |
| <p>Car free agreements don't deter car ownership and residents do own cars which puts pressure on already limited parking and leads to unacceptable congestion and decline in air quality and difficulties for existing residents</p> | <p>The surrounding areas are subject to parking restrictions and therefore parking enforcement. Residents would not be eligible for parking permits and this has been shown to be effective in discouraging car ownership.</p>   |
| <p>Development would encourage more ASB and crime in the immediate streets as the towns would provide new opportunities for criminal activity</p>   | <p>The MET Police were notified of the application and have no objection to the proposal subject to a small facility to be provided on site dedicated to neighbourhood police officers which the applicant has agreed to. No evidence has been provided to demonstrate the development would result in ASB or crime.</p>   |
| <p>2018 SHMA indicates there is a high need for family housing and of the 258 units planned on 13.95% will be family sized</p>  | <p>The revised proposal increases family housing to 18%. This provision is discussed in the main body of the report.</p>   |
| <p>Concerned for small shops on Dudden Hill Lane due to the shops proposed as part of the development and would not like to see local businesses wiped out by corporate brands</p>  | <p>The applicant has submitted a Retail Impact Assessment to support the application and justify the retail provision. This is discussed in detail in the main body of the report.</p>   |
| <p>Affordable artisan studios which were proposed have been changed to commercially rented workshops</p>  | <p>100% of the workspace is proposed as affordable with the space targeted towards small and micro sized businesses.</p>   |
| <p>Main entrance to the development would be via Dudden Hill lane and through a busy car park which is neither welcoming nor safe</p>   | <p>Whilst the limitations to this entrance are noted, improvements have been made during the course of the application which are discussed in detail in the report.</p>  |
| <p>Increased pressure on local bus and train services</p>   | <p>TfL have been consulted on the application and have raised no objection at this stage, although contributions may be requested towards public transport.</p>  |
| <p>Brent is very crowded and we don't need more people to make the situation worse</p>  | <p>The need for additional homes is established at a national, London and local level and the Draft London Plan proposes an increase in the housing targets for the borough. The site is allocated for co-location development (workspace and new homes) and the site is considered appropriate in principal for housing, subject to other planning requirements detailed within the report below.</p> |
| <p>The re-development will cause greater traffic congestion and a decline in air quality</p>  | <p>Discussed in the main body of the report.</p>   |
| <p>Changing character of neighbourhood which would see the family centric character of the area changed</p>   | <p>The development provides 18% family housing on site. Although this falls below the policy threshold the acceptability is discussed in greater detail in the main report.</p>  |
| <p>Buy to let properties do not facilitate a sense of community and contribute to a disproportionate</p>  | <p>The LPA has no control over the sale of the market dwellings.</p>   |

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| number of properties with transient tenants  |  |
| Opposed to the volume of rental accommodation within the development and the one bedroom private units are likely to be snapped up by buy to let landlords                           | There is a need for one bedroom homes, both for sale and rent. The type of housing on offer is discussed in greater detail in the main report.   |
| Not learning lessons of the part in terms of the detrimental impact of high rise council estates which are a hotbed of crime and ASB   | The development is a modern, mixed tenure, co location development which has been assessed against up to date policies and guidance.   |
| The development would have a detrimental impact on the amenity space of 364 High Road  | Discussed in main body of the report.  |
| Development should be car free and 66 spaces are excessive for location  | Discussed in the main body of the report.  |
| The development would encroach onto the land of 364 High Road  | The site location plan outlines the area to be developed. The application form has provided details of the landowners of the site which appear to be accurate and no evidence has been provided to contradict this.  |
| The development would result in considerable loss of light to neighbouring properties  | Discussed in main body of the report.  |
| A lot of the jobs created are likely to be of low quality  | The proposed development would generate employment opportunities in various different sectors and it is not considered they would be of a low quality.   |
| The quality and quantum of external space in the development will be low and there is already a lack of green space in the area  | Discussed in the main body of the report.  |
| Supermarket is too big and will encourage a lot of cars to the area  | Discussed in the main body of the report.  |
| The high proportion of affordable housing inevitably means a large proportion of occupants with limited means which is unlikely to contribute towards effective regeneration of area | The development provides affordable and market housing targeting people of different means to create an inclusive form of development. The provision of high quality affordable housing is also considered to be a contributor to appropriate regeneration.  |
| The over provision of one and two bedroom homes will result in Brent residents having to move if they cannot meet their housing needs  | The housing mix is discussed in detail in the main body of this report.  |
| Development will block light and create privacy issues to the Trading Centre to the rear of the site   | Daylight and privacy standards primarily relate to residential properties. The impact of the development is not considered to have a critical impact on the function of the neighbouring site.   |
| Building site will impact on noise, traffic vibrations and will cause cracks and damage to existing Victorian properties   | Some disturbance is inevitable with most building works. Measures are encouraged to minimise the potential adverse impact on neighbouring properties. Other legislation primarily ensures that construction works are carried out within reasonable times and the neighbouring properties are protected from damage. |
| No consultation with local residents prior to the submission of the application  | Whilst the LPA advise developers to carry out pre- submission consultation with local residents, there is no statutory requirement to do   |

so.

### Comments in support

Development would provide a much needed regeneration of this part of the High Road which has been neglected.

Ground floor shows the creation of a vibrant retail hub which would be a positive addition

Would bring much needed housing and job opportunities

Allows further opportunities for local businesses

Existing site contributes to the dilapidated negative environment on Dudden Hill Lane

Land is very much underutilised and the development would provide housing, community services and creative opportunities.

The nursery would be a huge asset to working parents who travel on the Jubilee line daily

The supermarket would be a huge asset and a convenient place for local residents to shop rather than having to travel to large supermarkets in nearby towns

An offer of 65% affordable housing is a very strong offer and should be viewed kindly

Development would result in a higher percentage of Willesden Residents using public transport

More residents would likely lift the amount of custom to local businesses

A budget supermarket would be useful for residents and help to cut car journeys. It would also aid financial inclusion - this part of the ward has many residents on modest incomes who are charged high prices in convenience stores

Community space is already very much available nearby

The proposal to provide a crossing point is very much needed

The gym would be a welcome addition as there is no such facility within walking distance in the area

London has a major housing shortage and we must be prepared to break with the past to solve it and therefore 9 storeys is not obtrusive in this location

High rise development is proven to result in improvements to surrounding areas in terms of foot traffic to shops, restaurants and general high street appearance.

Would encourage investment and development

### Neutral comment/suggestions

Masterplan options should not form part of the approved drawings as specific options shown are not deliverable

Double glazing and or a mechanical or passive ventilation system should be secured by condition to ensure acceptable internal noise levels

There should be no expectation that the other sites within the wider LSIS will make up any perceived loss of industrial capacity across the wider LSIS

The new public square would be better placed towards the tube station as it would be more inviting

Arrangements for watering should be made and the planting scheme should provide colour and blossom and art/sculptures should be considered

Should be a massive increase in trees to counter the pollution

In the context of the emerging site allocation for the wider LSIS the proposed development would make up a large proportion of the indicative capacity. Any planning permission should not prevent other sites within wider LSIS from being optimised for residential development

## 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 the Brent Development Management Policies 2016.

Key policies include:

## London Plan 2016

|      |  |
|------|--|
| 2.13 | Opportunity Areas and Intensification Areas  |
| 3.3  | Increasing housing supply  |
| 3.4  | Optimising housing potential   |
| 3.5  | Quality and design of housing developments   |
| 3.6  | Children and young people's play and informal recreation facilities                    |
| 3.9  | Mixed and balanced communities   |
| 3.11 | Affordable housing targets   |
| 3.12 | Negotiating affordable housing on individual private residential and mixed use schemes |
| 3.13 | Affordable housing thresholds  |
| 4.4  | Managing industrial land and premises  |
| 5.2  | Minimising carbon dioxide emissions  |
| 5.10 | Urban greening   |
| 5.13 | Sustainable drainage   |
| 5.15 | Water use and supplies   |
| 5.21 | Contaminated land  |
| 6.9  | Cycling  |
| 6.13 | Parking  |
| 7.1  | Lifetime neighbourhoods  |
| 7.2  | An inclusive environment   |
| 7.3  | Designing out crime  |
| 7.4  | Local character  |
| 7.5  | Public realm   |
| 7.6  | Architecture   |
| 7.7  | Location and design of tall and large buildings  |
| 7.14 | Improving air quality  |

## Brent Core Strategy 2010

|      |   |
|------|---|
| CP1  | Spatial Development Strategy  |
| CP2  | Population and Housing Growth   |
| CP11 | Burnt Oak/Colindale Growth Area   |
| CP19 | Strategic Climate Change Mitigation and Adaptation Measures             |
| CP20 | Strategic Industrial Locations and Locally Significant Industrial Sites |
| CP21 | A Balanced Housing Stock  |

## Brent Development Management Policies 2016

|       |  |
|-------|--|
| DMP1  | Development Management General Policy                  |
| DMP9b | On Site Water Management and Surface Water Attenuation |
| DMP11 | Forming an Access on to a Road                         |
| DMP12 | Parking  |
| DMP13 | Movement of Goods and Materials                        |
| DMP14 | Employment Sites                                       |
| DMP15 | Affordable Housing                                     |
| DMP18 | Dwelling Size and Residential Outbuildings             |
| DMP19 | Residential Amenity Space                              |

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

Key relevant policies include:

## Draft New London Plan

|     |   |
|-----|---|
| GG1 | Building strong and inclusive communities |
| GG2 | Making the best use of land               |
| GG3 | Creating a healthy city                   |
| GG4 | Delivering the homes Londoners need       |
| GG5 | Growing a good economy                    |

|      |   |
|------|---|
| GG6  | Increasing efficiency and resilience  |
| SD1  | Opportunity Areas   |
| D1   | London's form, character and capacity for growth                                |
| D3   | Optimising site capacity through the design-led approach                        |
| D4   | Delivering good design  |
| D5   | Inclusive design  |
| D6   | Housing quality and standards   |
| D7   | Accessible housing  |
| D8   | Public realm  |
| D9   | Tall buildings  |
| D12  | Fire safety   |
| D13  | Agent of Change   |
| D14  | Noise   |
| H1   | Increasing housing supply   |
| H4   | Delivering affordable housing   |
| H5   | Threshold approach to applications  |
| H6   | Affordable housing tenure   |
| H7   | Monitoring of affordable housing  |
| S4   | Play and informal recreation  |
| 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                        |
| G5   | Urban greening  |
| SI1  | Improving air quality   |
| SI2  | Minimising greenhouse gas emissions   |
| SI5  | Water infrastructure  |
| SI13 | Sustainable drainage  |
| T1   | Strategic approach to transport   |
| T2   | Healthy Streets   |
| T4   | Assessing and mitigating transport impacts                                      |
| T5   | Cycling   |
| T6.1 | Residential parking   |
| T7   | Deliveries, servicing and construction  |
| T9   | Funding transport infrastructure through planning                               |

#### Draft Local Plan

|       |  |
|-------|--|
| DMP1  | Development management general policy  |
| BD1   | Leading the way in good urban design   |
| BD2   | Tall buildings in Brent  |
| BD3   | Basement development   |
| BH1   | Increasing housing supply in Brent   |
| BH2   | Priority areas for additional housing provision within Brent                         |
| BH5   | Affordable housing   |
| BH6   | Housing size mix   |
| BH13  | Residential amenity space  |
| BE1   | Economic growth and employment opportunities for all                                 |
| BE2   | Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS) |
| BGI1  | Green and blue infrastructure in Brent   |
| BGI2  | Trees and woodlands  |
| BSUI1 | Creating a resilient and efficient Brent   |
| BSUI2 | Air quality  |
| BSUI4 | On-site water management and surface water attenuation                               |
| BT1   | Sustainable travel choice  |
| BT2   | Parking and car free development   |
| BT3   | Freight and servicing, provision and protection of freight facilities                |
| BT4   | Forming an access on to a road   |

The following are also relevant material considerations:

The National Planning Policy Framework 2019  
 Planning Practice Guidance including the National Design Guide  
 SPD1 Brent Design Guide 2018

## DETAILED CONSIDERATIONS

### Principle

#### *Chapmans and Sapcote Industrial Estate (BSSA4)*

1. The site forms part of the Church End Growth area, and has been identified as part of a strategic area for regeneration.
2. The draft local plan site allocation identifies the site as a Local Strategic Industrial Site, for mixed use housing, industrial and supporting community uses, with an indicative capacity of 200 housing units over 5-10 years.
3. A masterplan to incorporate intensification of the Chapman Park, Sapcote and Burnley Road Parade parts of the site allocation BSSA4 is under the final stages of development to support policy BSSA4. The site allocation states that piecemeal development which would prejudice the delivery of the wider masterplan will be refused.
4. In order to demonstrate that the re-development of this site would not jeopardise the re-development potential of the masterplanned area, the applicant has submitted their own indicative masterplan. This demonstrates that the wider LSIS would retain coherence if this scheme standards alone, but also that the adjacent parts of the LSIS could potentially come forward as future phases of a comprehensive co-located employment and mixed re-development.
5. The re-development of this site is therefore acceptable in principle and is unlikely to prejudice the delivery of the wider site allocation.
6. *Re-provision of industrial floorspace*
7. Policies E4, E6, E7 of the draft London Plan and BE2 of the Draft Local Plan recognise that there may be potential within LSIS for industrial intensification and co-location with residential and other land uses, subject to certain criteria. This includes securing no net loss of industrial capacity (defined as either the existing industrial and warehousing floorspace on site, or the potential floorspace that could be accommodated on site at a 65% plot ratio) and ensuring adjacent industrial activities are not compromised and appropriate design mitigation measures are secured in line with the Agent of Change Principle.
8. The existing site is predominantly used for open air storage and industrial activities and includes a two storey warehouse building (1423 sqm) together with a 507sqm MOT garage. As such the total existing industrial floorspace on the site is 1930sqm. Although this is substantially lower than the 65 per cent plot ratio which would result in a total of 5,845sq.m of industrial floorspace in this instance.
9. The original application submission proposed 1037sqm of light industrial floorspace in Class B1(c) use and 804sqm of flexible employment floorspace in either light industrial (Class B1(c) use) or office (Class B1(a) use). In response to the feedback on the proposed uses and the fact that the B1(a) space proposed would be unable to contribute to the quantum of replacement industrial capacity (and therefore there would be a significant loss in industrial capacity) the scheme was revised to shift the focus on employment provision towards Class B1(c) light industrial use.
10. This B1(c) space therefore accounts for 1868sqm floorspace and comprises creative light industrial "makerspace" studios and workshops suitable for small and micro sized businesses, artists and artisans. Whilst there would be a marginal net reduction of industrial floorspace of 62sqm, this is on balance considered acceptable given the improved quality of workspace that it being provided. Whilst the idea of converting some of the proposed retail/commercial floorspace to B1(c) to increase the total floorspace was discussed, the applicant has stated that this is not possible due to the fact that the retail floorspace

has an important role in assisting the overall viability of the proposed scheme. While the proposal would only result in a relatively minor loss of industrial floorspace (around 3%) the proposal would result in a significant reduction in Industrial Capacity (i.e. the 65% plot ratio discussed above). Whilst the proposal does not accord with London Plan policy in this respect, the benefits of the proposal must be weighed against the harm. The provision of around 4,000 sqm of additional industrial floorspace would significantly impact scheme viability and thus Affordable Housing. Furthermore, the provision of the industrial space as Affordable workspace (discussed below) also represents a benefit of the scheme. The council must carefully consider the policies and associated objectives of the development plan as a whole when evaluating this balance

11. During the course of the application the design and layout of the proposed light industrial floorspace has been revised and comprises taller floor to ceiling heights and natural daylight. Lifts serving the light industrial floorspace initially appeared to be the same size as residential cores shown have been enlarged to ensure that they are more suitable for the use of the light industrial occupiers. There were also concerns regarding the B1(c) floorspace being more akin to B1(a) office space. However, the applicant set out their approach with the view that the drawings are conceptual and it is considered that conditions could reasonably be attached if the application were to be recommended approval for detailed specification for the industrial floorspace (layout and fit) to ensure it is suitable. Agent of Change principles have been incorporated, in terms of sound insulation and mitigation and the orientation of windows. Details of the noise mitigation strategy would be secured by condition if the application were to have been recommended approval.

#### *Affordable workspace*

12. Draft Policy BE2 seeks 10% of employment floorspace to be affordable workspace in redevelopment of LSIS sites. This is reinforced in draft London Plan Policy E3.
13. As initially submitted, the proposed light industrial space was stated to be let at 50% of market value according to the applicant's initial FVA but there was insufficient clarity regarding the lease/disposal of the space to a recognised workspace provider. However, during the application process, the applicant formally proposed to provide all of the industrial space as Affordable workspace at a 50% discount to market rates. The applicant has expressed their willingness to secure the workspace as affordable workspace by definition via legal agreement
14. If the application were to recommended approval, it has been demonstrated that the development could deliver affordable workspace in compliance emerging draft Local Plan Policy BE2 and E3 of the London Plan.

#### *Housing*

15. The NPPF expects the planning system to boost significantly the supply of housing, including by identifying key sites in the delivery of their housing strategy. Core Strategy Policy CP2 sets out a target for delivering 22,000 new homes over the 2007-2026 period, including a target of 25% family sized accommodation.
16. The draft London Plan proposes increasing housing targets for London boroughs with the target number for Brent set to increase from 1,525 to 2,325 per year. Brent's emerging Local Plan seeks to focus housing growth within its growth areas and site allocations. In relation to the housing element, the proposed re-development would deliver 245 residential units, which is greater than the indicative capacity stated in the site allocation. The development would therefore contribute to the delivery of London's housing requirements and the Council's minimum housing target in line with London Plan Policy 3.3, draft London Plan Policy H1, and emerging policy BH1 of Brent's Local Plan.

#### *Retail and community use*

17. The other uses on site comprise food retail floorspace (supermarket) (Class A1), gym (Class D2), nursery (Class D1), commercial units (units 7 and 9) (flexible use for Class A1, A2, A3, D1 and/or B1c) and office (Class B1a).
18. In order to justify the retail use outside of a town centre location the applicant has submitted a retail impact assessment which concludes that the proposed supermarket is not likely to have a significant

impact on the vitality and viability of nearby town centres. The assessment also concludes that the impact of the other town centre uses would be minimal and would complement rather than negatively impact nearby centres. A sequential test has been undertaken which concludes that there are no sites in the locality that are better placed as alternatives. The provision of retail space in this out of town location can therefore be accepted.

19. In relation to the community use, this comprises a nursery with a floor area of 528sqm. As stated the Sapcote Estate allocation refers to the site being suitable for mixed use housing, employment and supporting community uses. The provision of a nursery would therefore be consistent with the expected use of this site.

## **Housing mix and tenure**

### *Tenure*

20. The applicant's revised application proposes 245 new homes (reduced from 258 residential units originally proposed). The updated accommodation schedule proposes 65% affordable housing by habitable room and unit. The Affordable Housing tenure split would be 35 Affordable Rented homes: 65 Intermediate by habitable room (32:68 by unit) and is therefore weighted towards Shared Ownership.
21. Brent's adopted local policy (CP2 and DMP15) sets out the affordable housing requirements for major applications and stipulates 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 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. The policies allow for the reduction in the level of Affordable Housing (below the 50% target) on economic viability grounds. This is discussed in more detail later in this report.
22. The emerging London Plan (Intend to Publish Version) has been subject to examination and the associated affordable housing policies (H4, H5 and H6) are now given greater weight. These policies establish the threshold approach to applications where a policy compliant tenure mix is proposed\*, where viability is not tested at application stage if affordable housing proposals achieve a minimum of:

35% Affordable Housing; or

50% Affordable Housing on industrial land\*\* or public sector land where there is no portfolio agreement with the Mayor.

\* other criteria are also applicable.

\*\* industrial land includes Strategic Industrial Locations, Locally Significant Industrial Sites and non-designated industrial sites where the scheme would result in a net loss of industrial capacity.

The policies set out the Mayor's commitment to delivering "genuinely affordable" housing and the following mix of affordable housing 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 homes;

40% to be determined by the borough based on identified need.

23. When interpreting these policies, the tenure mix set out in Brent's adopted policies (70:30 ratio of Affordable Rent : Intermediate) and Brent's emerging policies (70:30 ratio of London Affordable Rent : Intermediate) provide clarity on the tenure of the third category (40 % to be determined by the borough). This means that this element of Affordable housing mix should be provided as Affordable Rented homes.
24. These policies allow for a reduction to affordable housing obligations on economic viability grounds where it can be robustly demonstrated that the target level of affordable housing would undermine the deliverability of the scheme. The policies require schemes to deliver the maximum reasonable amount of Affordable Housing (i.e. the most that the scheme can viably deliver, up to the targets) and schemes that are not eligible for the threshold approach must be accompanied by a Financial Viability Assessment.

25. Brent's emerging Local Plan has yet to receive a response after examination in public and as such the adopted policy DMP15 policy and emerging London Plan policies H4, H5 and H6 would carry considerably more weight than the Brent emerging Affordable Housing policy at this point in time.
26. The development proposes 245 residential units, comprising 85 private units, 113 shared ownership units and 47 London Affordable Rented homes. As such the applicant's affordable housing offer provides 65.3% affordable housing by unit and of that figure 70.6% are shared ownership properties, and 29.4% London Affordable Rented properties. The tenure split therefore reverses the requirement under DMP 15 which seeks to secure 50% affordable housing on a 70:30 split affordable housing weighted in favour of affordable rented product.
27. The unit size and tenure mix is detailed below

|                        | 1 bed     | 2 bed      | 3 bed     | 4 bed    | Total      |
|------------------------|-----------|------------|-----------|----------|------------|
| Private                | 25        | 54         | 6         | 0        | <b>85</b>  |
| London Affordable Rent | 14        | 9          | 22        | 2        | <b>47</b>  |
| Shared Ownership       | 48        | 51         | 14        | 0        | <b>113</b> |
| <b>Total</b>           | <b>87</b> | <b>114</b> | <b>42</b> | <b>2</b> | <b>245</b> |

28. A Financial Viability Assessment (FVA) is required to demonstrate that the proposal would deliver the maximum reasonable proportion of Affordable Housing on a policy compliant tenure split. An FVA has been prepared on behalf of the applicant by Bidwells and submitted in support of the application.
29. *Initial offer*
30. The initial offer was on the basis of the initial workspace proposal, and did not include the additional workspace that is now proposed. Bidwells provided a Benchmark Land Value (BLV) based on the sites existing use value plus a landowners premium of 20% resulting in a BLV of £10,752,000.
31. On the basis of this assumption, Bidwells appraisal concluded that a policy compliant scheme (delivering 50% affordable housing with a 70:30 split) generates a financial deficit of £3.9 million against the BLV. By contrast, the applicants proposed accommodation mix with 66% affordable housing on a non-policy compliant tenure split is shown to be capable of delivering a land price of 9.15 million below the BLV.
32. Further testing was carried out by Bidwells to find the maximum reasonable level of affordable housing on a policy compliant tenure split. Bidwells concluded that 33% Affordable Homes could be provided if a policy compliant housing mix was proposed, which would equate to 80 affordable units of which 56 would be London Affordable Rented units (13 more than proposed) and 24 Shared Ownership units (89 less than proposed)
33. This position has been rigorously tested by BNP on behalf of the Council.
34. Following the evaluation of the scheme and discussions regarding the assumptions associated with the appraisal (such as the industrial yield as part of the Existing Use Value, the capitalisation rate for the supermarket as part of the proposed Development and the developer profit level), BNP advised that they considered the Benchmark Land Value to be £10.528 million, marginally below the value established by Bidwells
35. BNP undertook further appraisals of the proposed development to establish the quantum of affordable housing that could be provided, if the scheme as to provide a policy compliant tenure split. The analysis showed that the proposed development could deliver a total of 39.59% Affordable housing (comprising 69 London Affordable Rent homes and 28 shared ownership homes) which would generates an RLV of £10,638,648 providing a surplus of £110,648 against the agreed viability benchmark., On this basis, the

Council considers that the scheme could viably deliver 22 additional London Affordable Rented homes than are proposed.

36. Furthermore as not all assumptions had been agreed between both parties, BNP also carried out a sensitivity analysis adopting all of the Applicants appraisal assumptions. The proposed development with 33.88% affordable housing (61 London Affordable Rented homes and 22 shared ownership units) generates an RLV of £10,713,150 providing a surplus of £185,150. Therefore as a worst case scenario, BNP concluded that the scheme could viably deliver 14 additional LAR homes. Therefore while it was concluded that the proposal would represent the maximum viable amount of Affordable Housing on the mix that was proposed (weighted towards Shared Ownership homes), if the headline (total) affordable housing level was reduced, the number of London Affordable Rented homes, could increase significantly. The Affordable Housing Offer did not reflect policy which gives greater weight to the significant need for lower rental Affordable Homes in the borough.

#### *Updated FVA*

37. Further to the BNP appraisal results, the applicant amended their FVA to offer all of the workspace as affordable workspace and therefore at 50% discount to market rates. Bidwells retained all of BNP's assumptions and updated the appraisal to accommodate the increased affordable workspace provision. The appraisal concludes that the proposed non policy compliant offer of 66% affordable housing results in a minor deficit of £158,000. Bidwells also provided an appraisal demonstrating a policy compliant tenure split could viably deliver 35% affordable housing comprising 60 London Affordable Rented HOMES and 26 Shared Ownership homes. BNP has confirmed that Bidwells numbers are correct and agrees with the outcomes of both appraisal summaries.

#### *Conclusion*

38. The Brent Strategic Housing Market Assessment 2018 identified a need for 42,000 additional homes between 2016-2041. Using a limit of 33% of gross household incomes to be spent on rent/mortgages, affordable housing comprises 52% of that need. Of the affordable need identified 85% was for social rent (council house type rents) and 10% was for London Living Rent (pegged at a percentage of median incomes). Just 5% was for people able afford to between that and 80% of median local rents (typically these people might seek to buy shared ownership units) .Whilst the headline figure provided by the applicant, being 66% affordable housing, is well in excess of the 50% overall target set out in DMP 15 and emerging policy BH5 , this figure is weighted heavily in favour of intermediate product (shared ownership units) and therefore the proposal is not in accordance with this policy. As stated above, the SHMA identifies that intermediate products are essentially unaffordable to 95% of those in affordable housing need and are more likely to be occupied by people who have a choice within the market for alternative accommodation e.g. market rent.
39. The final offer presented by the applicant shows that even with 100% affordable workspace and on a policy compliant tenure split the development could reasonably deliver 13 additional London Affordable Rented homes which would help the most specific needs of the borough. Whilst this would be at the expense of a large proportion of intermediate units, there is far less need for this type of housing.
40. Given that primary need in the borough is for LAR homes (as reflected in adopted and emerging policy) the overprovision of Intermediate Housing and other benefits of the scheme are not considered to be of sufficient benefit to outweigh the harm associated with the under-provision of affordable rented homes to meet local need.

#### *Housing Size Mix*

41. In terms of the family sized dwellings, 43 of these are proposed (41 x 3 bed and 2 x 4 bed). Policy CP2 of Brent's Core Strategy outlines that at least 25% of new homes within the borough should be family sized (3 bedrooms or more). The scheme proposes 18% family housing which falls below the required threshold. However of the 43 proposed, 24 of these would be within the Affordable Rented tenure, which equates to 56% of the Affordable Rented Homes. Whilst the failure to meet the 25% target is noted, given the high proportion of affordable family housing provided within the scheme and the impact that the provision of additional private family sized homes would have Affordable Housing Provision, the benefits of the additional Affordable Housing is considered to outweigh the harm associated with the under

provision of family sized private homes and the overall provision is considered acceptable in this case.

### **Quality of accommodation**

42. Policy DMP18 states that the size of the dwellings should be consistent with London Plan Policy 3.5 Table 3.3 Minimum Space Standards for New Dwellings. Draft London Plan Policy D6 also sets out minimum space standards for new dwellings. The development includes the creation of 245 residential units all of which would meet or exceed technical space standard requirements for their respective size and occupancy levels.

#### *Layout and aspect*

43. Of the 245 units proposed, 91 are proposed to be dual aspect, which equates to around 37% of the total. Whilst the proportion is relatively low there would be no single aspect north facing units and nearly all of the family units would be dual aspect. Where single aspect units are proposed, given the buildings have run north - south, the majority of these units face either east or west, avoiding both north facing flats and habitable rooms. The internal arrangement of the units ensures that good levels of daylight would be able to permeate habitable rooms, thus ensuring a pleasant environment for future occupants. Whilst the overall form of the building, creates some habitable rooms within less conventional room shapes, overall the quality of accommodation is considered to be to a good standard. The submission shows the floor to ceiling heights would meet the Mayoral SPG and emerging policy target of 2.5m. The scheme generally accords with the London Plan target of no more than 8 homes per floor per core. However, a number of flats accessed via cores C1 (floors 3-6) and D1 (floors 2-7) have 9 homes per core. Nevertheless, this minor exceedance of the target is not considered likely to result in noticeable reductions in levels of social cohesion compared with the cores that achieve the target of 8, and the quality of accommodation is considered to be good.

#### *Privacy*

44. SPD1 seeks to ensure adequate privacy by requiring an 18m separation distance between overlooking habitable room windows/ balconies. The separation between blocks D and C and B and C would be in excess of the 18m required. Whilst separation distances would not be met between blocks A and B (which achieves a separation distance of 10m), the windows to the rear elevation of block A are secondary windows or windows serving non habitable rooms and therefore any privacy issues could be overcome by conditioning the windows to be obscure glazed and non-opening.
45. Whilst projecting balconies are proposed which reduces the separation distances between blocks, these have been arranged so that there is no direct overlooking and therefore the privacy of residents would be safeguarded.

#### *Daylight/Sunlight*

46. An Internal Daylight, Sunlight and Overshadowing Report to assess the light received by the proposed rooms within the development has been submitted with the application. All habitable rooms have been assessed for Average Daylight Factor (ADF). The results show that the proposal would provide a very high standard of compliance with the recommended targets, commensurate with a high density urban development of this type. The report has taken a sample of 61 rooms and assessed them against ADF targets. The results show that 59 of the 61 rooms rested meet the guidance of 1.5% ADF in the living room, 2.0% ADF in the kitchen and 1.0% ADF in the bedroom. Additionally, all units have been assessed for sunlight and the results demonstrate that the units have been designed in order to allow sunlight to enter at least one habitable room for part of the day.
47. Internally, the quality of accommodation is considered to be of a good standard.

#### *External amenity provision*

48. Policy DMP19 and emerging Policy BH13 state that 50sqm of external amenity space should normally be provided for family sized units (3 plus bedrooms) at ground floor level and 20sqm for all other units. The policy sets out that this should be in the form of private external amenity space but recognises that where this cannot be achieved, communal amenity space contributes towards the policy targets. This is a significantly higher policy standard than that specified in the Mayors Housing SPG and emerging London Plan Policy D6, which requires a minimum of 5sqm of private outdoor space for 1-2 dwellings with an

extra 1sqm to be provided for each additional occupant.

49. Private amenity space would be provided in the form of terraces and balconies. All of the units would benefit from private external space that would meet Mayors Standards being between 5sqm for the smallest units and 10sqm for the larger units. Whilst all of the properties would meet Mayors Housing Standards, the vast majority of units would fall short of the 20sqm target under DMP 19. Of the 245 units proposed, 21 units would have amenity space in excess of 20sqm which would equate to a percentage of 8% of units meeting DMP 19 requirements. The total amount of private amenity space equates to 2,732.5sqm.
50. In addition to the private amenity space, two communal roof terraces are provided at podium level (second floor) totalling 1090sqm. However, these are accessed via cores B, C1 and D1 and are not accessible by all homes. It is also noted that the 1412sqm of shared public amenity space within the new public square is also proposed. However, as this area also serves as the access to many of the flats and the workspace, additional hard and soft landscaping features would be required to increase its usability as open space. Nevertheless it can be given some weight and further details of the space could be secured through condition should permission be granted.
51. When considering the number and size of the units, DMP 19 and the fact that there are no family units at ground floor that would generate the 50sqm requirement, the development would be expected to deliver 4900sqm of external amenity space to meet Brent policy targets. The shortfall against the targets would vary between cores, and has been calculated as follows:

| Block | No. homes | Private amenity shortfall | Pro-rata communal terrace space | Resultant shortfall |
|-------|-----------|---------------------------|---------------------------------|---------------------|
| A     | 11        | 152.2                     | 0                               | 152.2               |
| B     | 33        | 337.8                     | 281                             | 56.8                |
| C1    | 51        | 565.3                     | 565.3                           | 0                   |
| C2    | 47        | 525.2                     | 0                               | 525.2               |
| D1    | 66        | 771                       | 243.7                           | 527.3               |
| D2    | 34        | 427                       | 0                               | 427                 |
| E     | 3         | 10.7                      | 0                               | 10.7                |
| Total | 245       | 2778.5                    | 1090                            | 1699.2              |

52. If the shared public space is taken into account, this would reduce the deficit down from 1699 sqm to 427 sqm. The site is approximately 120 m from the Learie Constantine Open Space on Villiers Road and a similar distance to the Willesden Communal Gardens on Denzil Road (from the closest entrances within the development. Given the location and density of the scheme and the proximity to other open spaces, and giving weight to the benefits of the scheme, the shortfall in external amenity space provision is considered acceptable in this instance

#### *Children's Playspace*

53. Of the total external amenity provision, 395.sqm is to be designated as playspace for children under 5, in accordance with the Mayor's Play and Informal Recreation SPG and draft London Plan Policy S4. A child yield of 93 is expected from the development, with a child yield of 37 within this age group. On site play provision is solely directed towards this age group and totals 395sqm. The playspace would be provided in at podium level and would include a mix of soft landscaping, more durable play surfaces, seating shading and play equipment.
54. No on site playspace would be provided within the development for older children. However, the SPG and draft Policy S4 enable consideration of the use of offsite provision of play area facilities for children. For children aged 5-11 facilities within a 500m walking distance and for 12 and above, facilities within an 800m walking distance may be taken into account. Smaller open spaces can be found on Villiers Road (Learie Constantine Open Space) and on Denzil Road both of which are a short walking distance from the subject site. Whilst the development fails to secure appropriate play space for children over 5, if this

application were recommended approval the absence of this could be appropriately mitigated through a financial contribution towards additional play provision in the local area, secured via Section 106 agreement.

## **55. Impact on neighbouring properties**

### *Privacy*

56. SPD1 requires that development should ensure a good level of privacy inside buildings and within private outdoor space. Directly facing habitable room windows will normally require a minimum separate distance 18m, except where the existing character of the area varies from this. A distance of 9m should be kept between gardens and habitable rooms or balconies. Separation distances across streets are normally dictated by the form of development in the area.

**57.** In terms of privacy, Block B would be positioned to the rear of the properties on Colin Road. Owing to the orientation of the building, the flank wall would sit adjacent the rear boundaries of these properties. A number of the windows to the flank elevation are primary windows to habitable rooms. SPD 1 states that directly facing habitable room windows will normally require a minimum separation distance of 18m, except where the existing character of the area varies from this. A distance of 9m should be kept between gardens and habitable rooms or balconies. In this case Block B would be positioned 14m from the rear boundaries of Colin Road and the total distance between overlooking windows would be no less than 18m. The separation distance would therefore ensure that the privacy of the residents of Colin Road would not be unduly impacted as a result of the development.

### *30/45 degree rules*

58. SPD 1 states that in order to protect neighbouring amenity, the building envelope should be set below a line of 30 degrees from the nearest rear habitable room window of adjoining existing property, measured from a height of 2m. Where proposed development adjoins private amenity/garden areas then the height of the new development should normally be set below a line of 45 degrees at the garden edge, also from a height of 2m.

**59.** The residential buildings that share a common boundary with the site include 2a to 20 Colin Road. The rear gardens of these properties are modest and have a particularly high boundary treatment to the rear (approx. 3.8m). When taken at the height of the existing boundary treatment, the development would not breach the 45 degree rule and therefore would be acceptable in this regard.

**60.** There is a distance of approximately 21m from the rear elevations of 8-14 Colin Road and Block B which is a five storey nearest the boundary. In relation to the 30 degree rule, the development would comply when considered in relation to the rear windows of the properties on Colin Road.

**61.** In relation to the 30 degree rule, when considered in relation to the 364 High Road this breach would be significant, however, the distance between the rear windows of this property and the site is minimal and therefore any additional massing would like breach this guidance.

### *62. 2:1 guidance*

**63.** SPD 1 states that the 2:1 guidance that is that new buildings and extensions do not extend further beyond the neighbouring building line that half the distance to the centre of the nearest habitable room. In this case Block E would extend more than 3m in depth directly along the boundary with no. 20 Colin Road. Although no detailed elevations have of this neighbouring property have been submitted the nearest habitable room window would be no more than 2m from the boundary with this neighbouring property which would restrict the height of the extension to 1m in depth. However, it is noted that Block E has been designed to replicate the relationship of the existing building positioned along the boundary with 20 Colin Road. Therefore whilst this aspect of the proposal would fail to comply with SPD1, the existing situation on site would not be worsened and as such the development is considered acceptable in this respect.

### *64. Daylight*

65. SPD 1 states that new development should ensure a good level of daylight, sunlight and outlook through the day and year and to minimise the impact on surrounding properties and spaces. Brent supports the

use of 'Site Layout planning for daylight and sunlight: a guide to good practice' produced by BRE.

66. The applicant has submitted a daylight/sunlight assessment in support of their application. The report uses two principle measures of daylight for assessing the impact on properties neighbouring a site, namely Vertical Sky Component (VSC) and Average Daylight Factor (ADF).
67. Vertical Sky component is the measure of a direct skylight reaching a point from an overcast sky. The BRE guidelines state that if the VSC at the centre of a window is less than 27% or 0.8 times its former value, then the reduction in skylight will be noticeable and the existing building may be adversely affected.
68. Average Daylight Factor (ADF) is a measure of the overall amount of diffuse daylight within a room. BRE guidance states that acceptable ADF values, are 1% for a bedroom, 1.5% for a living room and 2% for a kitchen.
69. It should be noted that whilst there is a third method of assessment (No Sky Line) this has not been used as the room layouts are not known.
70. In determining applications, the Mayors Housing SPD states that BRE guidance should be applied sensitively to higher density development in London, particularly central and urban settings, recognising the London's Plans strategic approach to optimise housing. It goes on to state that the guidance should not be applied rigidly without carefully considering the location and context and standards experienced in broadly comparable housing typologies in London.

#### *364 High Road*

71. This is a first floor unit, where the rear boundary borders the subject site. Two windows have been assessed, serving habitable rooms. It should be noted that the windows experience very high levels of VSC in the existing situation due to the lack of obstruction and therefore any massing would likely create reductions that appear more severe. Nevertheless in this case, the percentage reduction to these rooms would be 68.61% and to 78.83%. When considered in relation to the sense of enclosure and loss of outlook due to the proximity of the building identified above, there are concerns regarding the impact of the development on the amenity of this property.

#### *362 High Road*

72. This property contains 5, one bedroom units. Two of the units within this building, have all their habitable rooms facing Colin Road and therefore the subject site. The ground floor unit with sole habitable room windows facing the site would experience VSC losses to the living room of 45.32% and the bedroom would experience losses of 37.74%. The first floor unit would experience VSC losses of 43.49% and the bedroom would experience 38.30%. The development would result in a significant reduction in natural light to both of these properties. The ADF results are also significantly harmful, with all windows falling below targets. When considering these properties only have a single aspect outlook the overall impact on the living conditions of the occupiers would be severe and the development would therefore fail to ensure good standards of internal amenity in compliance with policy DMP1.
73. There are three other units within this building. However, the main habitable rooms front High Road. Whilst additional windows are found to the flank elevation, these serve the kitchens of the units and are not separate rooms. Whilst the losses to these kitchen areas would also be between 33- 43% and these rooms would also be served by BRE compliant windows and as such are less of a concern.

#### *2 Colin Road*

74. In relation to 2 Colin Road, all windows to the rear projection would suffer major losses. The ground floor rear windows are indicated to serve a kitchen and the first floor window serves a bedroom. All VSC losses to these rear windows would be in excess of 40%. ADF would also be reduced below target levels.

#### *65-73 (odds.) Dudden Hill Lane*

75. These properties are two storey terraced buildings with commercial units at ground floor with residential above. The submitted report identifies that the front windows to all of these properties would experience losses well beyond BRE targets. Given the relatively small nature of these units it can be assumed that all

windows serve habitable rooms, although the specific use of the room is unknown. In terms of VSC the losses to the front windows would be well in excess of the 20% losses considered unnoticeable in BRE guidance being in excess of 40%. When considered in relation to ADF, the losses would be slightly reduced and with the front facing windows, which clearly read as primary habitable room windows being between 35% and 37%.

76. A number of other surrounding properties have been assessed as part of the application and the results are more positive than those specified above, even though the majority fall below the BRE targets they do not experience major losses in line with those discussed above.

*4-20 Colin Road (evens.)*

77. 2 Colin Road has already been identified as experiencing major daylight losses to the rear habitable room windows. When considering the other properties in this terrace, the losses would be less acute but still notable.

*1-23 Colin Road (odds.)*

78. With regards to 1-23 Colin Road, the vast majority of windows would be meet BRE guidance with reductions being no more than 20% the former value. Where greater losses are identified, these losses are largely experienced within rooms that are served by multiple openings, with other windows passing. The daylight losses to these properties are therefore expected to be significant for occupants of these properties and the overall impact would not be significantly harmful.

*399- 425 High Road (odds.)*

79. In relation to the properties on High Road, 399-407 and 421-425 High Road would meet BRE standards in relation to VSC, or would very marginally exceed the 20% loss considered acceptable. Whilst losses in excess of 20% would be experienced by 409 High Road and 411 High Road, these would not be excessive, when considered the existing massing on site and the scale of the proposed development. Further testing shows that the windows in these properties would pass BRE requirements for ADF. Therefore when considering the results in combination and having regard to the existing situation on site, the losses experienced to these properties are considered acceptable.

80. In relation to 413-419 High Road, the VSC losses for the majority of the windows would experience losses between 30-38% and therefore well in excess of the 20% losses which BRE guidance states would be unnoticeable to occupants. However, again all of the windows would meet ADF targets. When considering the losses and the fact that losses would only be experienced to front facing windows, the losses are considered acceptable.

*49-61 Dudden Hill Lane*

81. In relation to these 49-59, these are first floor residential units above commercial premises. The VSC results show that for the most part losses would be below 20%. Whilst there would be some isolated examples of losses in excess of 20% this would not be significant. When considered in conjunction with the ADF results which all meet targets, the impact of the development on this property is considered acceptable. In relation to no. 61 Dudden Hill Lane, this is served by bay windows at ground and first floor. The average VSC loss to the ground floor window is 26% and to the first floor window is 22%.

*75-81 Dudden Hill Lane*

82. These properties comprise first floor units above ground floor commercial units. The vast majority of rooms within this terrace would meet BRE targets for VSC. Whilst there would be some isolated breaches, these would be marginally in excess of the 20% losses. Further ADF testing of these windows shows positive results and therefore the impact on the overall living conditions of the occupiers would not be significantly harmful.

*356-360 High Road*

83. Four windows have been tested at 356-360 High Road, and none of these would suffer VSC losses in excess of 20%. Daylight losses would therefore likely be unnoticeable to the occupants of these properties.

## *Sunlight*

84. In relation to sunlight, the BRE recommends that the APSH (Annual Probable Sunlight Hours) received at a given window in the proposed case should be at least 25% of the total available, including at least 5% in winter.
85. All rooms with windows orientated within 90 degrees due south experience fully BRE compliant changes in Annual and Winter Sunlight hours, with the exception of one window at 61 Dudden Hill Lane. However, this window forms part of a bay, where the other windows pass therefore not having any significant impact on the room that the window serves.
86. The situation in relation to sunlight is therefore acceptable.

## *Conclusion*

87. The results demonstrate that a large number of properties would experience material losses in daylight. Whilst noting that the BRE guidelines state that a 20% reduction in VSC results in a materially noticeable change, it is appreciated that the location of the site and its relatively undeveloped nature would mean that it would be difficult to achieve such limited reductions in light to all neighbouring windows, whilst optimising the site's potential. Nevertheless, whilst a degree of flexibility can be applied to the guidance, there remains concern that a number of neighbouring properties would experience major daylight losses in excess of 40%. This is particularly concerning for those units that are single aspect where acute reductions are experienced to all main habitable rooms i.e. in the case of 362 High Road.
88. Whilst the applicant has referred to what they consider to be broadly comparable residential typologies in other parts of London (as suggested by the Mayors Housing SPD ) each proposal must be considered on its merit and this is considered insufficient justification. Any LPA is required to weigh up the impacts of the scheme including those on surrounding properties, with its wider benefits. As already identified above, the development fails to deliver a substantial proportion of London Affordable Rented product due to the adopted tenure split. In this respect, the development fails to secure sufficient benefits that would help to outweigh the identified harm experienced to a notable proportion of surrounding residential properties.

## **Character and appearance**

89. The NPPF seeks developments of high quality design that will function well and add to the overall quality of the area, being sympathetic to local character and history, establishing or maintaining a strong sense of place, and optimising the potential of the site to accommodate an appropriate amount and mix of development. Further detailed design principles are set out in Chapter 7 of the London Plan and Chapter 3 of the draft new London Plan, and in Brent's Policy DMP1 and the Brent Design Guide SPD1. Draft Local Plan Policy BD1 also seeks a high standard of design quality, and more specific guidance on tall buildings is given in draft new London Plan Policy D8, and Brent's draft Policy BD2 and draft Tall Buildings Strategy.
90. The site and the surrounding units form the proposed site allocation BSSA4: Chapman's and Sapcote Industrial Estate. The site itself occupies the eastern area of the site allocation and largely comprises low level industrial units. Other than surrounding industrial uses which form part of the wider site allocation located to the north and northwest, the site is surrounded by two storey terraced housing on Colin Road and High Road and two storey mix used terraced buildings along Dudden Hill Lane. It is for this reason that the site allocation highlights the need for development to be sensitive to its impact's on the amenity of surrounding properties and to step down to an appropriate scale.

## *Layout*

91. The proposed layout is based around four north south orientated blocks. Each of the four blocks (A-D) would comprise commercial uses on the ground and first floor with residential above. An additional four storey block (Block E) is proposed to adjoin 20 Colin Road to replace a building of a similar scale.
92. The main retail unit (supermarket) would be positioned along Dudden Hill Lane allowing for a more continuous retail frontage. The entrance to the proposed gym, as well as the residential Blocks A and B would also be from Dudden Hill Lane to ensure a more continuous active frontage to this road, although it is noted there would be a slight break in this due to the proposed vehicular access.

93. The residential entrance to Block E and a retail unit adjacent to 364 High Road, as well as the entrance to the nursery would also provide improved active frontage to Colin Road. Although this activity would be intercepted by the placement of two substations and an emergency exit.
94. A courtyard area is proposed to the west of the site opening up at the junction of Colin Road and High Road with continuous active frontages provided to its perimeter. Residential entrances, office reception areas, nursery entrances, retail units and cafes seek to create a vibrant, secure and well activated public space.
95. The awkward space created by the retention of 364 High Road at the edge of the site has been addressed through the erection of a green wall, which screens the flank wall of this adjoining building, with the adjacent space being dedicated to cycle parking.

#### *Height, bulk and massing*

96. The scale of the development would evidently represent a significant change from the surrounding context which primarily consists of two storey terraced dwellings. Nevertheless, it is accepted that the development would optimise the development potential of the site.
97. The height, roofline and appearance of the development is varied in order to provide visual interest and avoid the scheme appearing a single mass of development in local or wider townscape views. The rooflines would be angled create a slated/edged appearance. Furthermore, whilst of notable scale the massing of the scheme has been staggered in order to better respect the residential properties on Colin Road, whilst ensuring that the taller elements of the scheme strengthen the townscape character and legibility along High Road and Dudden Hill Lane.

#### *Design and detailing*

98. In terms of materials, these design and access statements refers to these being chosen to respond to the immediate environment and reference the industrial history of the site.
99. Brick is proposed to all of the areas that face the street, the courtyard and the elevations facing the neighbouring industrial estate. In order to contrast with this and provide some relief from the bricks facades a bronze metal panel is introduced to the centre of the site. This is with the aim of visually distinguishing between the blocks and reducing mass and bulk.
100. The proposed balconies to the brick facades would be metal cladding to match the inner blocks with metal balustrades infilling brick piers forming the recessed balconies. Where projecting balconies are proposed the balustrades would be consistent with those that are recessed. The balconies proposed to the metal clad buildings would be glass. Smaller detailing such as copings, trims and rainwater pipes match the metal cladding.
101. Coloured glazed tiles would be introduced to at lower levels to enhance the attractiveness of the voids beneath overhanging blocks and areas of blank frontage adjacent the supermarket car parking.
102. So as to not jeopardise the future redevelopment potential of Sapcote Industrial Estate, there are no windows positioned to the north elevations of the proposed development. In order to ensure some articulation in the absence of any fenestration, a textured facade has been adopted which ensures an element of interest.
103. In terms of the commercial and employment spaces, the ground and first floor would be visually differentiated using double height units with floor to ceiling glazing, bronze metal panels and windows frames and would be set within a simple grid structure of brick columns.

#### *Landscaping*

104. Due to the existing use of the site, there is currently no greenery on site. In relation to landscaping proposal, there are large designated areas of green space at ground floor level. Instead the scheme incorporates a number of green walls totalling 347sqm. These are positioned along the entrance from Colin Road and around the car parking area, and the rear boundaries of the properties on Colin Road. In addition to the green walls, the scheme also incorporates 25 new trees across the public courtyard and car parking area as well as raised planters throughout the public courtyard to provide further greening.
105. In addition the ground floor proposals, additional planters and hedgerow planting is proposed as

second floor level as well as 155m<sup>2</sup> of green roof at third floor level.

### *Pedestrian Access*

106. Pedestrian access is proposed from the High Road, Colin Road and Dudden Hill Lane. Pedestrian access as initially proposed was through the site from Dudden Hill Lane through the car park to High Road which was proposed to be accessible at all times. However, a number of concerns were raised that this would not appear to be a very safe route through the site, particularly at night due the amount of dead frontage. Further information on this route has been submitted by the applicant to ensure its safety. It has been confirmed that the pedestrian route would only be open during business hours of the supermarket and outside of these hours the gates positioned at Dudden Hill Lane and under Block C will be locked with only disabled residents having access to a key fob. Outside of the supermarket operating hours, pedestrians and residents would have to access residential cores and other commercial uses via the High Road Courtyard. Further information of the management strategy for the access gates could be requested by condition in the event of an approval. When open, landscaping, paving and a generous footpath width would ensure the pedestrian route is well defined for users.

### *Heritage*

107. London Plan Policy 7.8 and Policy HC1 of the draft London Plan states that development should conserve heritage assets and avoid harm. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. This states that all planning decisions should 'have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.' The NPPF re-enforces this by stating that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be.

108. The site is not located within a conservation area and does not contain any listed buildings or structures and there are no conservation areas or listed buildings within the immediate vicinity of the site. The site's wider context includes Willesden Jewish Cemetery and Willesden Green Conservation Area is located approximately 700m to the south along Dudden Hill Lane. The applicant has undertaken a Townscape and Visual Impact Assessment detailing views in which the development would be partially visible or closest view points to illustrate the impact of the building. On the basis of the assessment submitted, the development would not harm the setting of either the Willesden Green Conservation Area or Willesden Jewish Cemetery.

### **Transport**

#### *109. Car Parking*

110. The location of the site means that the lower residential and employment car parking standards set out in the adopted DMP 2016 currently apply.

111. The reduced total of 245 residential units would therefore be allowed up to 204 car parking spaces, with the supermarket again allowed 18 spaces, the smaller retail units now allowed six spaces and the employment floorspace again allowed two spaces. This gives a total allowance to 230 spaces for the amended scheme. The revised provision of 67 spaces is therefore again well within the maximum allowance for the development as a whole.

112. The absence of spare on-street parking capacity in the area means that a 'car-free' agreement is required for the flats to ensure that overspill parking does not lead to parking problems in the wider area. This has been agreed by the applicant.

113. For disabled parking, draft London Plan standards would require at least eight car parking spaces to be wide bays marked at the outset for disabled residents of the flats, with the scope to increase provision to 25 spaces in future if demand warrants. The revised plans show seven wide spaces (18-24) for the flats initially. At least one further space is therefore required.

114. The applicant has shown resistance to providing disabled parking in accordance with minimum London Plan standards though, on the basis that an accessible Car Club space will be provided on Colin Road. Whilst this might help to reduce demand for further spaces above the initial 3% provision, it is not accepted as a reason not to provide the initial 3% standard of eight spaces.
115. The applicant has stated that it is not possible to provide the additional space without affecting the landscaping, although it should be noted this assumes that all other spaces must be kept available for the retail use. Nevertheless, the monitoring of car park usage is proposed with retail spaces to be re-allocated as residential disabled spaces if surplus to requirements. If permission were to be granted, it is considered that retail spaces would need to be re-allocated to residential blue badge use if required, and that this would be necessary to ensure that the proposed development did not result in an equalities impact. If permission were to be granted, this could be captured through the Section 106 legal agreement.
116. Of the remaining 59-60 spaces for the non-residential uses, four are shown as wide disabled parking spaces, which more than satisfies the requirement that 5% of public spaces be reserved for Blue Badge holders. As before though, the remaining 55-56 standard width spaces significantly exceed the maximum allowance of 26 spaces for all non-residential floorspace set out in the current DMP.
117. As previously noted, Policy DMP12 does allow additional public parking to be provided where trips cannot be accommodated on public transport, as long as this is supported by a Transport Assessment and as long as charging is in line with existing on- and off-street parking charges for the area. The submitted Car Park Management Plan proposed free parking for up to two hours though, which does not accord with parking charges in the wider area and so would not be acceptable. Further the applicant has also shown resistance to applying pay and display parking charges to the spaces to fit in with general town centre parking charges in the area, so the scheme would be likely to undermine the Council's own parking strategy which looks to encourage non car access and the proposed parking arrangements would encourage additional unnecessary car journeys to and from the site and Willesden generally.
118. The applicant has instead justified the excess retail parking on the grounds that the proposed supermarket requires this level of parking to be viable, with reference made to a similar development in South London where a relaxation to parking standards was allowed. However, it is noted that the parking numbers proposed in this case are twice those provided for a recent similar development in Alperton by the same retail operator, where the PTAL value is lower than for this site. The suggestion that the scheme would not be viable with a lower level of parking therefore cannot be accepted.
119. Furthermore, since the submission of the application in 2018, the Draft Local Plan has received Full Council approval and has been submitted to the Secretary of State for approval. This now therefore carries more greater weight and in terms of residential, retail and employment car parking, would expect a development in an area with a PTAL rating of 5 such as this to be 'car-free' (aside from disabled parking). The proposal is therefore likely to become further out of kilter with car parking standards in the near future.
120. As previously noted, setting down and collection of children at the nursery by car can be accommodated in new and existing on-street pay and display bays in Colin Road, although the CPZ should help to discourage car use amongst parents anyway.
121. As before, a total of 15 of the proposed car parking spaces (three residential & 12 commercial) are shown with electric vehicle charging points, which is confirmed as being in line with London Plan standards, although all remaining spaces will need passive provision to comply with proposed New London Plan standards. This has been confirmed by the applicant.

#### *Cycle parking*

122. With regard to bicycle parking, the reduction in the number of flats reduces the residential requirement to 405 long-term and seven short-term spaces. For the various commercial uses, at least 38 long-stay and 50 short-stay spaces are now required.

123. As before, internal bicycle stores at ground and basement levels (with lift access) and external bike stands are proposed. The total storage capacity for 504 long-stay and 66 short-stay spaces, plus provision for oversized bicycles/tricycles etc., meets requirements and the layouts of the stores are acceptable. Shower/locker/changing facilities should be provided for the employment space.

### *Servicing*

124. In terms of servicing arrangements this includes the provision of a full-size loading bay to the rear of the supermarket with access through the car park, which is fine subject to suitable lighting being provided (which could be conditioned). Tracking has been provided to show that vehicles can reverse into the bay and banksmen should be on hand to assist with this, given the reversing in will be from a public area.

125. As initially submitted no marked provision for servicing of the other residential and commercial units was shown. In order to address this, it was initially recommended that a loading area be marked at the southern end of the car park supplemented by a loading bay in the footway of High Road fronting the entrance to the central courtyard. However, it has subsequently been confirmed that all deliveries will be made from within the site, with a central loading bay provided for all other units (apart from the foodstore). A Delivery and Servicing Management Plan would be used to spread the use of the bay across the course of the day. The managed approach is acceptable in principle and as such the request for an on street bay along the High Road frontage would not be required.

126. The layout of the site complies with standard dimensions for car parks, with the additional aisle width in the main part of the car park accommodating access by delivery vehicles. Details of lighting have been provided, which confirm that average illuminance of 36 lux (uniformity 0.26) will be provided for the external car park and 123 lux (uniformity 0.52) for the undercroft area of the car park. These exceed the recommended minimum standards of 20 lux and 75 lux respectively, so could be reduced if desired.

127. The entrance from Dudden Hill Lane is retained close to its existing location, which provides suitable sightlines in each direction. This entails the shortening of the bus stop markings though, which has been agreed in principle with London Buses.

128. Improved 6m kerb radii are to be provided so that 16.5m long articulated lorries do not need to cross the centre line of Dudden Hill Lane when turning left into and out of the site, tracking diagrams have been submitted to this end, although they would straddle the whole width of the car park access road.

129. Gates are proposed at the car park entrance set 5m from the highway boundary, which is acceptable provided they are kept open throughout normal trading hours. The headroom through Block A is shown at 5.4m, to accommodate delivery vehicle access.

### *Access*

130. The provision of a public pedestrian route through the site is very much welcomed to improve the permeability and movement through the area.

131. To accommodate onward movement towards Dollis Hill Underground station and eastbound bus stops, a zebra crossing is proposed in Dudden Hill Lane to the east of the site access to replace an existing pedestrian refuge.

132. Further works are also proposed in Colin Road, including the construction of a speed table at its junction with High Road to improve pedestrian access to the site and the provision of speed cushions along the street to keep traffic speeds down. As a number of existing access to the site will be removed, amendments to provide additional on-street parking bays within the local CPZ will also be made. If the application were recommended approval Highways works would be secured through a S38/S278 Agreement.

133. One of the new spaces in Colin Road is also proposed to be marked for use by a Car Club to support the development. The developer has been liaising with an accessible Car Club provider to ensure the

vehicles are available to disabled Blue Badge holders, which would help to avoid any need to provide additional Blue Badge parking spaces in the site in the future.

134. The Car Club itself would need to be promoted to residents through the Travel Plan and this would need to include the offer of free membership to new residents for a minimum two year period to introduce them to the concept which could be secured via a legal agreement.

#### *Transport Assessment*

135. To consider the likely impact of the proposal, surveys of similar uses across London and the UK have been examined and aggregated together.

136. This exercise predicts that the development as a whole will generate 401 person trips in the morning peak hour (8-9am), 602 trips in the evening peak hour (5-6pm) and 1,115 trips in the Saturday afternoon peak hour (4-5pm). These have then been broken down by mode. As the residential, employment and gym uses are to be car-free, minimal vehicular traffic is expected to be generated by those uses. Only the supermarket and nursery are therefore likely to generate significant numbers of vehicle trips.

137. Estimated vehicular trips for the supermarket have been based on surveys at four other sites in the UK, only one of which is in London. There is concern that by not including certain sites (such as a very comparable site in Catford, on the basis that the survey was for vehicles only), the vehicular trip rate has been underestimated by about 25%, particularly on weekdays. However, this is balanced by the fact that the calculation also assumes that all trips are new on the network, whereas some trips (estimated at 30% generally) will be passing the site anyway so are already on the wider road network. The overall vehicular trip prediction for the supermarket is therefore considered to be realistic.

138. Trips for the nursery are based on two surveys for other nurseries in the UK and the results are considered to be realistic for this site too.

139. Existing vehicular movements into and out of the site have then been deducted from the totals and the resultant vehicle trips (48 arrivals/38 departures in the am peak (8-9am), 61 arrivals/75 departures in the pm peak (5-6pm) and 95 arrivals/90 departures in the Saturday peak (4-5pm)) have been added to the road network with distribution to the east and west based upon assessments of the local catchment area.

140. Existing flows along Dudden Hill Lane have also been adjusted to reflect predicted growth in background traffic by the predicted year of opening, at the time of submission which was 2022.

141. The operation of the site access junction and the signalised junction of Dudden Hill Lane and High Road have then been tested using industry standard software for the three peak weekday and weekend periods.

142. For the site access, the maximum predicted ratio of flow to capacity (rfc) calculated was 0.40 for traffic turning right out of the site on a Saturday afternoon. This is well within the maximum recommended value of 0.85 and the junction is therefore considered capable of operating without causing any undue delay.

143. The junction model for the Dudden Hill Lane/High Road junction was thoroughly checked against video observations to ensure it accurately represents existing conditions, so it is considered to be robust.

144. For the worst-case scenario of traffic flows growth up to the year 2022 and development traffic added through the junction on existing cycle times, the model shows a maximum degree of saturation (DoS) of 85% (against a maximum recommended value of 90%) and practical reserve capacity of 5.2% for the Saturday afternoon peak hour. Weekday peak hour operation showed practical reserve capacity rising to 15%-20%. As such, the junction has been demonstrated to be able to comfortably accommodate predicted future traffic flows from the development.

145. With regard to travel by other modes, the development is predicted to generate 78 bus journeys in the am peak hour (8-9am), 91 in the evening peak hour (5-6pm) and 240 in the Saturday afternoon peak hour (1-2pm). With about 90 bus service per hour passing close to the site, this generally equates to an average of about one passenger per bus during the week and three passengers per bus on a Saturday.

146. The average additional loadings are relatively low due to the large number of bus services, but TfL would have final confirmation that the services do have sufficient spare capacity to absorb the extra demand. In the case there is not sufficient space capacity, a financial contribution would be sought.
147. A Supplementary Transport Assessment Note submitted in August 2020 with the amended drawings. This largely covers issues relating to parking, but does also provide a further assessment of the impact of the development on Dollis Hill station and Jubilee line services.
148. The revised assessment predicts that the development will generate 57 journeys (19 arrivals/38 departures) in the am peak hour (8-9am) and 99 journeys (56 arrivals/43 departures) in the evening peak hour (5-6pm). As before, this would equate to less than two passengers per train during the weekday peak hours, which is not considered to be significant, although it would be up to TfL to confirm that there is sufficient spare capacity available and if there is not a financial contribution would be sought.

#### *Travel Plan*

149. To help to support the low level of parking proposed on site and promote alternative travel options, separate Travel Plans have been submitted for the residential, workspace and commercial units.
150. These are all to be managed by their own Travel Plan Co-ordinator (there will need to be close liaison between all three) over a five year period.
151. Measures are to include the provision of travel information across noticeboards, welcome packs etc., participation in sustainable travel promotional events, promotion of Car Clubs and car sharing and management of the car parks and delivery areas.
152. The aim for the three Travel Plans will be to keep car journeys by residents and staff to below 1% of the total journeys, which should be easily achieved due to the 'car-free' nature of the development and the presence of a CPZ in the area.
153. Progress towards the targets would be monitored biennially for the first five years of occupation of the site using i-TRACE compliant surveys and potential remedial measures have been identified should targets not be met.

#### *Construction Logistics*

154. If the application were to be recommended approval Construction Logistics Plan would also again be required prior to works starting. This would allow an appropriate details to be agree to help minimise disruption during construction.

#### **Sustainability and energy**

155. Planning applications for major development are required to be supported by a Sustainability Statement in accordance with Policy CP19 and draft Local Plan Policy BSUI1, demonstrating at the design stage how sustainable design and construction measures would mitigate and adapt to climate change over the lifetime of the development, including limiting water use to 105 litres per person per day. Major commercial floorspace is required to achieve a BREEAM Excellent rating and this also needs to be appropriately evidenced.
156. Major residential developments are expected to achieve zero carbon standards including a 35% reduction on the Building Regulations 2013 Target Emission Rates achieved on-site, in accordance with London Plan Policy 5.2 and emerging London Plan Policy SI2. An Energy Assessment is required, setting out how these standards are to be achieved and identifying a financial contribution to Brent's carbon-offsetting fund to compensate for residual carbon emissions. For non-domestic floorspace, the policy target is a 35% on-site reduction, and this is to be evidenced separately in the Energy Assessment. Draft Policy SI2 also includes specific targets for energy efficiency measures and applies the zero carbon standard including 35% reduction in on-site emissions to both residential and commercial development.

#### *Carbon emissions*

157. The Energy Assessment and Sustainability Strategy submitted sets out how the London Plan energy

hierarchy has been applied, using energy efficiency measures and renewable energy. On the basis of the assessment, an on-site reduction in CO<sub>2</sub> emissions of 63% beyond 2013 Building Regulations compliant development is expected on the residential element of the scheme and a saving of 55% on the non-domestic element. This exceeds the minimum expectations for onsite carbon dioxide savings as set out in Policy SI2 of the draft London Plan.

158. Using the energy hierarchy, the applicant has achieved the reductions through 'Lean' measures such as building fabric, reduced air permeability, efficient heating services and control systems and energy efficient lighting and 'Green' measures including the installation of air source heat pump systems for space and domestic hot water heating and PV installation ensuring reductions in regulated CO<sub>2</sub> emissions from on-site renewable sources. Whilst the use of 'Clean' measures and therefore the inclusion of a site wide heating system was investigated with potential options being connection to an area wide lower carbon heat distribution network, a site wide heat network or a CHP system, this was not considered practicable for the development.
159. A BREEAM Pre-assessment has been carried out, indicating a minimum rating of 'Excellent' for the commercial and industrial units, in compliance with Policy CP19 and draft Policy BSUI1.
160. If the application were to be recommended approval Revised Energy Assessments would be secured at detailed design and construction stages, together with a financial contribution to Brent's carbon offsetting scheme to achieve zero carbon development (this is predicted to be £167,252, based on the submitted details, however an improved on-site carbon performance would result in a lower level of contribution). A Post-Completion Certificate to evidence the BREEAM Excellent rating would also be secured.

#### *Flood risk and drainage*

161. The Environment Agency flood map shows the site to be located within Flood Zone 1 and is located in Flood Zone 3a for Surface Water flooding. A Flood Risk Assessment and Drainage Strategy has therefore been submitted to demonstrate that the proposed development would be safe and would not increase flood risk in the surrounding area. The NPPF classifies the vulnerability of different forms of development to flooding, with residential development classified as 'more vulnerable', which is considered appropriate in Flood Zone 1. Further guidance on flood risk is set out in London Plan Policy 5.12, draft London Plan Policy SI12, Brent's Policy DMP9A and draft Policy BSUI3. London Plan Policy 5.13, draft London Plan Policy SI13 and Brent's Policy DMP9B and draft Policy BSUI4 set out principles for sustainable drainage strategies to be provided for major developments.
162. Through the proposed strategy the applicant proposes to achieve a greenfield run off rate by restricting surface water run off levels in excess of 12 litres per second for likely storm events within a 100 year period, with a 40% allowance for climate change. This would provide a significant improvement on the existing run off rate of 130 litres per second. As initially submitted this was to be achieved solely through the provision of attenuation storage beneath the proposed car park. Following requests further SuDs measures have been incorporated including green/blue roofs, green walls and permeable paving.
163. The approach to flood risk and drainage would comply with the relevant policies and is considered to be acceptable.

#### **Environmental considerations**

##### *Noise*

164. A noise impact assessment has been submitted, demonstrating that noise limits within the site would comply with British Standards. To ensure any plant is maintained within acceptable noise levels a conditions could be used if planning permission were to be granted.

##### *Air quality*

165. An air quality assessment including an air quality neutral assessment has been submitted, and has been accepted by Environmental Health officers. No conditions are required to ensure acceptable air quality, although a Construction Management Statement would be requested by condition if the application were to be recommended approval.

##### *Contaminated land*



|                              | (Gr)  | (Kr) | (A)      | used    | used  |               |       |
|------------------------------|-------|------|----------|---------|-------|---------------|-------|
| Shops                        | 2206  |      | 2120.06  | £40.00  | £0.00 | £126,446.14   | £0.00 |
| Either B1, B2 and / or B8    | 1868  |      | 1795.22  | £0.00   | £0.00 | £0.00         | £0.00 |
| Assembly and leisure         | 1583  |      | 1521.33  | £5.00   | £0.00 | £11,342.04    | £0.00 |
| Non-residential institutions | 528   |      | 507.43   | £0.00   | £0.00 | £0.00         | £0.00 |
| Dwelling houses              | 21690 |      | 20844.97 | £200.00 | £0.00 | £6,216,266.46 | £0.00 |

|  |               |       |
|--|---------------|-------|
| BCIS figure for year in which the charging schedule took effect (lc)   | 224           | 224   |
| BCIS figure for year in which the planning permission was granted (lp) | 334           |       |
| <b>Total chargeable amount</b>   | £6,354,054.64 | £0.00 |

\*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 – REFUSAL

Application No: 18/3498

To: Ms Considine  
DP9  
100 Pall Mall  
London  
SW1Y 5NQ

I refer to your application dated **05/09/2018** proposing the following:

Demolition of existing buildings and erection of 5 mixed use blocks ranging from 4 to 10 storeys plus basement levels, comprising; 245 residential units at 1st to 9th floors, and light industrial floorspace (Class B1c), food retail floorspace (supermarket) (Class A1), gym (Class D2), nursery (Class D1), commercial units (units 7 and 9) (flexible use for Class A1, A2, A3, D1 and/or B1c) and HA office (Class B1a) at basement, ground and part 1st floors, together with associated vehicular access, car and cycle parking spaces, bin stores, plant room, substations, landscaping and amenity space (Amended description)

and accompanied by plans or documents listed here:

|               |                                     |
|---------------|-------------------------------------|
| 1123-A-P-001  | Site Location Plan                  |
| 11123-A-P-010 | Existing Ground Floor               |
| 11123-A-E-020 | Existing Dudden Hill Lane Elevation |
| 11123-A-E-021 | Existing Colin Road Elevation       |
| 11123-A-E-022 | Existing High Road Elevation        |

11223-A-P-101 Rev R - Ground floor plan  
11223-A-P-102 Rev P - First floor plan  
11223-A-P-101 Rev O - Second floor plan  
11223-A-P-104 Rev M - Third floor plan  
11223-A-P-105 Rev M - Fourth floor plan  
11223-A-P-106 Rev M - Fifth floor plan  
11223-A-P-107 Rev M - Sixth floor plan  
11223-A-P-108 Rev M - Seventh floor plan  
11223-A-P-109 Rev K - Eighth floor plan  
11223-A-P-110 Rev G - Ninth floor plan  
11223-A-P-111 Rev C - Roof plan

11223-A-E-140 Rev F - Elevations Y and Z  
11223-A-E-141 Rev F - Elevations X and Y  
11223-A-E-142 Rev E - Elevations V and U  
11223-A-E-143 Rev E - Elevations S and T  
11223-A-E-144 Rev D - Elevations Q and R

11223- A-S-122 Rev H - Sections U and V  
11223- A-S-121 Rev E - Sections U and V  
11223- A-S-120 Rev D - Sections Y and Z

|                     |              |
|---------------------|--------------|
| 11123-A-P-201       | Flat Type 01 |
| 11123-A-P-202 Rev A | Flat Type 02 |

|                     |              |
|---------------------|--------------|
| 11123-A-P-203       | Flat Type 03 |
| 11123-A-P-204 Rev A | Flat Type 04 |
| 11123-A-P-205       | Flat Type 05 |
| 11123-A-P-206       | Flat Type 06 |
| 11123-A-P-211 Rev A | Flat Type 11 |
| 11123-A-P-212 Rev A | Flat Type 12 |
| 11123-A-P-213       | Flat Type 13 |
| 11123-A-P-214       | Flat Type 14 |
| 11123-A-P-215       | Flat Type 15 |
| 11123-A-P-216       | Flat Type 16 |
| 11123-A-P-220       | Flat Type 20 |
| 11123-A-P-221 Rev A | Flat Type 21 |
| 11123-A-P-222 Rev B | Flat Type 22 |
| 11123-A-P-223 Rev A | Flat Type 23 |
| 11123-A-P-224 Rev A | Flat Type 24 |
| 11123-A-P-225 Rev A | Flat Type 25 |
| 11123-A-P-226 Rev A | Flat Type 26 |
| 11123-A-P-227 Rev B | Flat Type 27 |
| 11123-A-P-228       | Flat Type 28 |
| 11123-A-P-229 Rev A | Flat Type 29 |
| 11123-A-P-230       | Flat Type 30 |
| 11123-A-P-232       | Flat Type 32 |
| 11123-A-P-233       | Flat Type 33 |
| 11123-A-P-234       | Flat Type 34 |
| 11123-A-P-236       | Flat Type 36 |
| 11123-A-P-237       | Flat Type 37 |
| 11123-A-P-238       | Flat Type 38 |
| 11123-A-P-239 Rev A | Flat Type 39 |
| 11123-A-P-240 Rev A | Flat Type 40 |
| 11123-A-P-241 Rev B | Flat Type 41 |
| 11123-A-P-242 Rev A | Flat Type 42 |
| 11123-A-P-243 Rev A | Flat Type 43 |
| 11123-A-P-244       | Flat Type 44 |
| 11123-A-P-245       | Flat Type 45 |
| 11123-A-P-245       | Flat Type 45 |
| 11123-A-P-246       | Flat Type 46 |
| 11123-A-P-247       | Flat Type 47 |
| 11123-A-P-248 Rev A | Flat Type 48 |
| 11123-A-P-249 Rev A | Flat Type 49 |
| 11123-A-P-250 Rev B | Flat Type 50 |
| 11123-A-P-251       | Flat Type 51 |
| 11123-A-P-252       | Flat Type 52 |
| 11123-A-P-253 Rev A | Flat Type 53 |
| 11123-A-P-254 Rev A | Flat Type 54 |
| 11123-A-P-255       | Flat Type 55 |
| 11123-A-P-256       | Flat Type 56 |
| 11123-A-P-257       | Flat Type 57 |
| 11123-A-P-258       | Flat Type 58 |
| 11123-A-P-259       | Flat Type 59 |
| 11123-A-P-260 Rev A | Flat Type 60 |
| 11123-A-P-261 Rev A | Flat Type 61 |
| 11123-A-P-262       | Flat Type 62 |
| 11123-A-P-263 Rev A | Flat Type 63 |
| 11123-A-P-264 Rev A | Flat Type 64 |
| 11123-A-P-265 Rev A | Flat Type 65 |
| 11123-A-P-266 Rev A | Flat Type 66 |
| 11123-A-P-267 Rev B | Flat Type 67 |
| 11123-A-P-268       | Flat Type 68 |
| 11123-A-P-269       | Flat Type 69 |
| 11123-A-P-270       | Flat Type 70 |
| 11123-A-P-271       | Flat Type 71 |
| 11123-A-P-272       | Flat Type 72 |
| 11123-A-P-273       | Flat Type 73 |

|                     |               |
|---------------------|---------------|
| 11123-A-P-274       | Flat Type 74  |
| 11123-A-P-275       | Flat Type 75  |
| 11123-A-P-276       | Flat Type 76  |
| 11123-A-P-277       | Flat Type 77  |
| 11123-A-P-278 Rev A | Flat Type 78  |
| 11123-A-P-279       | Flat Type 79  |
| 11123-A-P-280       | Flat Type 80  |
| 11123-A-P-281       | Flat Type 81  |
| 11123-A-P-282       | Flat Type 82  |
| 11123-A-P-283       | Flat Type 83  |
| 11123-A-P-284       | Flat Type 84  |
| 11123-A-P-285       | Flat Type 85  |
| 11123-A-P-292       | Flat Type 92  |
| 11123-A-P-296       | Flat Type 296 |
| 11123-A-P-297       | Flat Type 297 |
| 11123-A-P-298       | Flat Type 298 |
| 11123-A-P-299       | Flat Type 299 |
| 11123-A-P-300       | Flat Type 300 |
| 11123-A-P-301       | Flat Type 301 |
| 11123-A-P-302       | Flat Type 302 |
| 11123-A-P-303       | Flat Type 303 |
| 11123-A-P-304       | Flat Type 304 |
| 11123-A-P-305       | Flat Type 305 |
| 11123-A-P-306       | Flat Type 306 |
| 11123-A-P-307       | Flat Type 307 |
| 11123-A-P-308       | Flat Type 308 |
| 11123-A-P-309       | Flat Type 309 |
| 11123-A-P-310       | Flat Type 310 |
| 11123-A-P-311       | Flat Type 311 |
| 11123-A-P-312       | Flat Type 312 |

at **Land at 370 High Road and 54-68 Dudden Hill Lane, London, NW10**

The Council of the London Borough of Brent, the Local Planning Authority, hereby **REFUSE** permission for the reasons set out on the attached Schedule B.

Date: 05/01/2021

Signature:

**Gerry Ansell**  
Head of Planning and Development Services

**Note**

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.

DnStdR

## PROACTIVE WORKING STATEMENT

- 1 To assist applicants the Local Planning Authority has produced policies and written guidance, all of which is available on the Council's website and offers a pre planning application advice service. The scheme does not comply with guidance.

## REASONS

- 1 The proposed development would fail to deliver the maximum reasonable amount of Affordable Rented housing and would therefore fail to appropriately meet identified housing need within the borough, contrary to policy 3.12 of the London Plan (consolidated with alterations since 2011); policy DMP15 of Brent's Development Management Policies (2016) and policies H5 and H6 of the emerging London Plan (Intend to publish version 2019).
- 2 The proposed development by virtue of its siting, size and layout would be prejudicial to the amenities of neighbouring residential occupiers primarily in terms of loss of light which would not be outweighed by the benefits of the scheme. This would be contrary to Policy DMP1 of the Brent Development Management Policies 2016, policy DMP1 of the emerging Brent Local Plan (Regulation 19 version), the Brent Design Guide SPD1 (2018) and the guidance contained within the National Planning Policy Framework.
- 3 The proposed development would provide excessive retail parking for the proposed supermarket without sufficient means to promote non-car access, and would encourage unnecessary and excessive vehicular trips to and from the site and would undermine existing town centre and car parking policies which seeks to minimise car usage to achieve the sustainable transport objectives set out within the Development Plan. The development would therefore fail to comply with DMP 12 and Draft Local Plan Policy BT2 and London Plan Policy 6.13 and Draft London Plan Policy T6.3.
- 4 In the absence of a legal agreement to control such matters, the development would not secure:
  - Affordable Housing
  - Sustainability measures;
  - Job and training opportunities for local residents;
  - Necessary highway improvement works;
  - Necessary pedestrian environment improvement works;
  - A travel plan, inclusive of car club measures;
  - Sufficient affordable workspace through the incorporation of appropriate safeguarding mechanisms;
  - Necessary contributions towards amendments to the spaces within controlled parking zones and the removal of rights for parking permits for future residents and business users;
  - Necessary contributions towards the local public transport capacity and accessibility.
  - Necessary contributions towards local play provision

As a result, the proposal would fail to comply with policies 4.12, 5.2 and 3.12 of the London Plan (consolidated with alterations since 2011); policies CP1 and CP19 of Brent's Core Strategy (2010); policies DMP1, DMP11, DMP12, DMP13 and DMP15 of Brent's Development Management Policies (2016); policies E3, E11, SI1, SI2, H5, H6, T4, T6 and T9 of the emerging London Plan (intend to publish version 2019); policies DMP1, BP7, BSU1, BSUI2, BT1, BT2, BT3 and BT4 and site allocation BSSA4 of Brent's emerging Local Plan (Reg 19 Version 2019) and the guidance contained within Brent's S106 Planning Obligations SPD (2013).

## INFORMATIVES

- 1 The applicant is advised that this development would be liable to pay the Community Infrastructure Levy if approved. In the event of a successful appeal, 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](http://www.brent.gov.uk/CIL).

Any person wishing to inspect the above papers should contact Paige Ireland, Planning and Regeneration, Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ, Tel. No. 020 8937 3395