

**PRE-APPLICATION REPORT TO COMMITTEE**  
**Planning Committee on 10 August 2015**  
**Item Number**  
**Case Number 16/0205/PRE**

**SITE INFORMATION**  
**RECEIVED: 2016**

**WARD: Alperton**

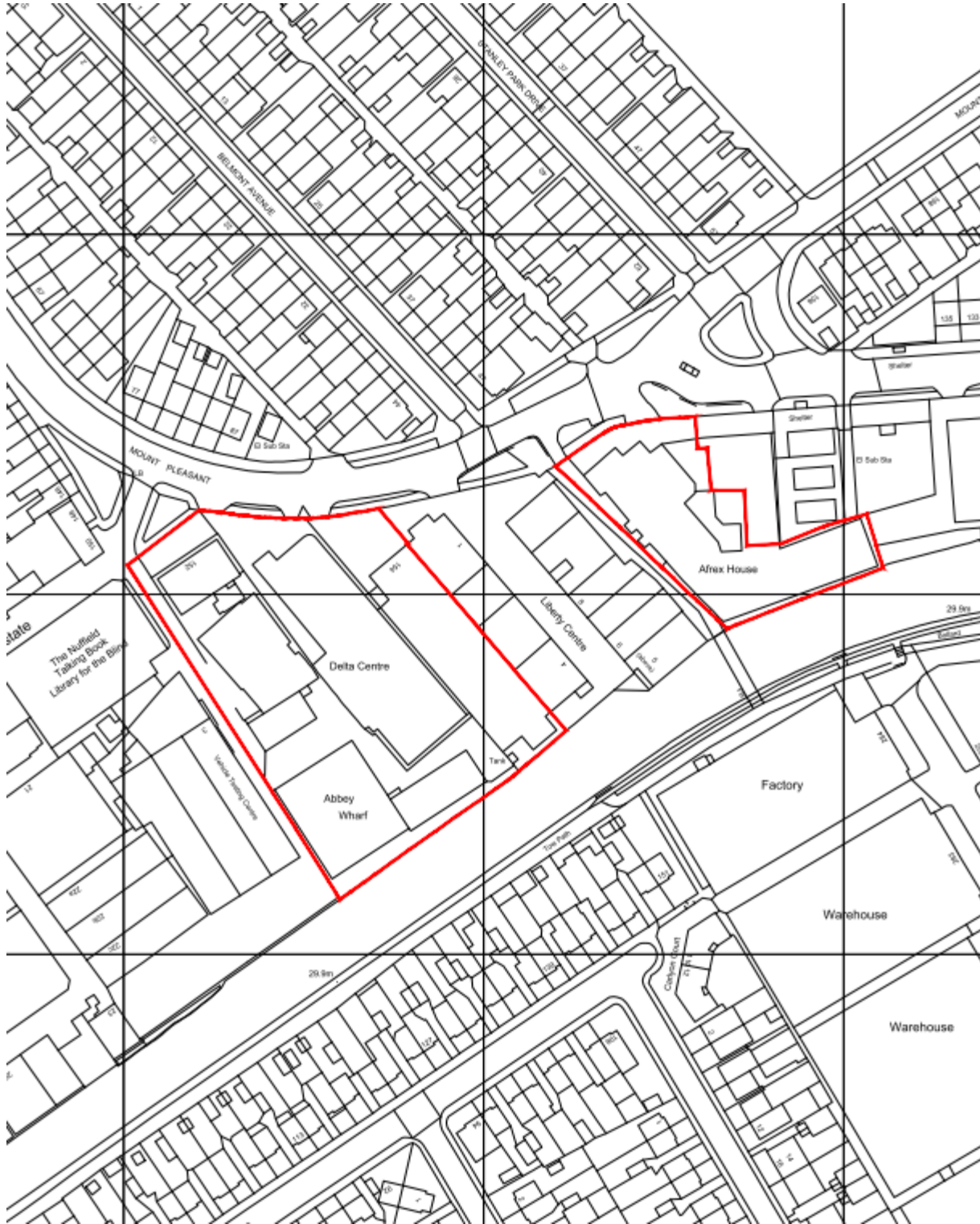
**LOCATION: Mount Pleasant and Afrex House, Mount Pleasant, Alperton, HA0 1TX**

**SCHEME:** Demolition of existing buildings and proposed redevelopment comprising four buildings (annotated on the plans as Building A, B, C and D) of between four to six storeys in height to accommodate 435sqm of commercial floorspace and 174 residential units, new public open space, associated part basement car parking, landscaping, new street trees and public realm improvements.

**APPLICANT:** Inland Homes  
**Agent:** Nathaniel Lichfield and Partners  
**Case Officer:** Victoria McDonagh (North Area Team)

# SITE MAP

This map is indicative only



## DEVELOPMENT DETAILS

### Ref: 16/0205/PRE

**Location:** Mount Pleasant and Afrex House, Alperton

**Ward:** Alperton

**Description:** Demolition of existing buildings and proposed redevelopment comprising four buildings (annotated on the plans as Building A, B, C and D) of between four to six storeys in height to accommodate 435sqm of commercial floorspace and 174 residential units, new public open space, associated part basement car parking, landscaping, new street trees and public realm improvements.

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## BACKGROUND

This proposed development is being presented to enable Members of the committee to view the proposal before a planning application is submitted, and to comment upon it. The development does not constitute an application for planning permission and any comments made upon it are provisional and subject to full consideration of any subsequent application and the comments received as a result of consultation, publicity and notification.

This is the first time the proposed development is being presented to Members. Prior to this, the applicants have been engaged in an extensive period of pre-application discussion with Council Officers. The proposal was presented to the Council's internal Major Cases Forum on 25 February 2016 and 5 May 2016.

## PROPOSAL and LOCATION

### Proposal

The proposed development involves two application sites. The first of which contains Blocks A and B which involves the demolition of the existing industrial/ware house buildings and redevelopment to provide a mixed use development with commercial at ground floor and residential above. A new public open space along the canal is proposed. The second site contains Blocks C and D, and involves the demolition of Afrex House and its redevelopment to provide a mixed use development with commercial and residential uses.

Proposed residential mix:

#### Buildings A and B

Unit Size	Building A	Building B	Total	Total (%)
1 Bed 2 Person	24	23	47	<b>33%</b>
2 Bed 3 Person	3	6	9	<b>6%</b>
2 Bed 4 Person	46	33	79	<b>55%</b>
3 Bed 5 Person	6	2	8	<b>6%</b>
<b>Total</b>	<b>79</b>	<b>64</b>	<b>143</b>	<b>100%</b>

#### Buildings C and D

Unit Size	Building C	Building D	Total	Total (%)
1 Bed 2 Person	4	0	4	<b>13%</b>
2 Bed 3 Person	0	0	0	<b>0%</b>
2 Bed 4 Person	9	8	17	<b>55%</b>
3 Bed 5 Person	<b>6</b>	<b>4</b>	<b>10</b>	<b>32%</b>

### Site and Surroundings

Both application sites contain two storey industrial buildings. The sites are separated by the Liberty Centre which is also two storeys in height. To the south of the site is the canal with a mix of residential uses and industrial uses located on the opposite side of the canal. To the north on Beresford Avenue are two storey semi detached residential houses.

The site is located within the Alperton Growth Area and also forms part of Site Specific Allocation (SSA) A.7 – Mount Pleasant/Beresford Avenue. The SSA also includes the Liberty Centre and 100 Beresford Avenue to the east. The canal is designated as . The Alperton Growth Area has also been designated as a Housing Zone.

The site currently has a Public Transport Accessibility Level (PTAL) of 1 to 2.

## Planning History

### The following planning decisions are relevant:

There is a current outline planning application in for 100 Beresford Road (LPA Ref: 16/0389) proposing the following development:

*Outline application for demolition of existing warehouse and erection of one six storey and one three storey building comprising 71 residential units (24 x 1bed, 27 x 2bed and 20 x 3bed) and children's nursery, with associated basement level for car and cycle parking spaces, bin stores, landscaping, amenity space and fencing*

There have also been a number of recent prior approvals granted at the Liberty Centre to change the use from Offices (B1(a)) to Residential. A table setting these out is provided below:

Address	Application Reference	Number of Units
First, Second and Third Floors 10 Liberty Centre	15/2439	6 x 2 bedroom flats
First Floor 6 Liberty Centre	15/4856	2 x 1 bedroom flats
First Floor 8 Liberty Centre	15/4875	2 x 1 bedroom flats
5 Liberty Centre	15/4962	3 x studio flats and 5 x 1 bedroom flats

## CONSULTATION RESPONSE

At this stage it is intended that the following will be consulted regarding any subsequent planning application:

Statutory Consultee:-

(Internal)

- Ward Councillors (Brent)
- Transportation (Brent)
- Environmental Health (Brent)
- Landscape Design (Brent)
- Tree Protection Officer (Brent)
- Sustainability Officer (Brent)
- Housing (Brent)
- Urban Design Officer (Brent)
- Planning Policy (Brent)
- Local Lead Flood Authority (Brent)

(External)

- Secure by Design Officer (Met Police)

- The Environment Agency
- Canals and Rivers Trust
  
- All existing properties and addresses within 100m of the application site.

## **COMMUNITY ENGAGEMENT**

In accordance with planning legislation, the developer has consulted the local community on these proposals as part of the pre-application process. The applicant has advised of the following:

*A comprehensive pre-application process of community consultation regarding the two proposal sites has been undertaken and continues.*

*Active engagement of the local community began in April 2016, with a consultation leaflet delivered within a significant consultation area.*

*Public events were held in May on the early vision and intentions of the proposal. A little under 40 local residents attended providing feedback on a number of issues, these have been fed into the design process as the proposal has been further developed.*

*The Heather Park Neighbourhood Watch has been engaged with a briefing held to members in late May. A further briefing on the further developed proposal has been scheduled for the next meeting of the association.*

*Community feedback has covered a wide range of issues, these include:*

- *materials and design*
- *car parking*
- *public transport*
- *affordable housing*
- *public and green space*
- *opening up the canal*

*A further consultation leaflet was delivered in the consultation area in early June 2016 to encourage further feedback from residents.*

*Feedback has been encouraged online through a dedicated consultation website, through social media, a dedicated consultation hotline and a free-post feedback form.*

*With the two proposals now becoming more developed, further engagement is planned with interested stakeholders prior to submission.*

## **REGENERATION CONTEXT**

The application sites are located within the Alperton Growth Area. Policy CP8 of Brent's Core Strategy relates to Alperton Growth Area where it identifies Alperton for mixed use regeneration along the Grand Union Canal. It seeks to provide at least 1,600 new homes to 2026, supported by infrastructure to be identified within the Infrastructure and Investment Framework. Anticipated infrastructure will include new and/or improved education facilities at nursery, primary and secondary school level, new health facilities, new and improved public open space and new community centre.

The Alperton Growth Area has also recently been designated as a Housing Zone, which reinforces its status of housing development.

To support Brent's Core Strategy the Council has produced and adopted its Site Specific Allocations Development Plan Document (SSA). This document sets out the planning policies and guidance for the future development of over 70 key opportunity sites around the borough. One of these sites known as A.7 – Mount Pleasant/Beresford Avenue.

Site A.7 is identified for mixed use development including residential, work/live, managed affordable workspace and amenity/open space. Proposals should seek to introduce active frontages along Mount Pleasant as well as improve canal side access for pedestrians, with moorings for canal users as well as conserve and enhance the canal's Site of Metropolitan Nature Conservation Importance designation. Access to remaining industrial area to the west will be improved. Improvements will be sought to public transport as part of any proposal to develop the site. The SSA proposed an indicative development capacity of 100 units for the whole SSA.

In addition to the above policy documents, the Council has produced and adopted the "Alperton Masterplan" Supplementary Planning Document. The purpose of the Masterplan is to set out in detail how the Council will bring about the transformation of this industrial area into a new, mostly residential neighbourhood. It is intended to provide clear guidance for developers, landowners and residents about the scale of change which the Council would like to see happen. The Masterplan vision is to create three distinctive new neighbourhoods linked by a high quality and lively stretch of canal, which are:

Alperton's core: a cultural centre  
Waterside residential neighbourhood  
Northfields Industrial Estate.

The application site within the Waterside residential neighbourhood. The regeneration principles for the Waterside residential neighbourhood is defined by

- A permeable network of streets and spaces designed primarily for people
- Building heights mainly three storeys to respect existing context
- Homes largely consist of maisonettes and town houses with doors
- Commercial activity within studios, workspaces and local shops
- Better access to canal

## **MATERIAL PLANNING CONSIDERATIONS**

The main issues raised by the proposed development that the Committee should be aware of at this stage are:

### **Issue 1**

#### **Principle of development**

SSA A.7 supports the mixed use development of the site including residential, work/live, managed affordable workspace and amenity/open space. Both application sites include commercial floorspace on the ground floor. Limited information has been provided on the nature of the commercial units. The SSA sets out that it should include managed affordable workspace. This matter has been raised to the applicant by your officers and will be explored in more detail as part of the planning application stage.

The number of residential units exceeds the indicated capacity set out within the SSA. However, this is considered acceptable in principle given that the site is now designated as a Housing Zone, subject to the quality of the residential units, relationship to adjoining sites, public realm improvements etc which are considered below.

### **Issue 2**

#### **Affordable Housing and Mix of Units**

London Plan policy 3.12 requires borough's to seek the maximum reasonable amount of affordable housing, taking account of a range of factors including local and regional requirements, the need to encourage rather than restrain development and viability. The policy requires borough's to take account of economic viability when negotiating on affordable housing.

The applicant will be required to demonstrate that the maximum reasonable of affordable housing is being provided in this scheme, and this would need to be tested through the submission of a financial appraisal submitted with any future planning application which would be subject to scrutiny by or on behalf of your Officers.

Policy CP21 of Brent's Core Strategy 2010 seeks for 25% of units to be family sized (three bedrooms or more). This is reinforced in the Alperton Masterplan where a larger proportion of family sized units are promoted within the Waterside Residential Neighbourhood. This includes 60% of affordable rent units to be three bedrooms or more. Whilst Buildings C and D exceed 25% family sized units, Buildings A and B only propose 6% family sized units, which is significantly below policy requirements. The applicant will need to address this matter as part of the planning application submission.

### **Issue 3**

#### **Scale, massing and height**

London Plan policy 3.5 promotes quality in the design of housing developments.

Policy 7.6 on 'Architecture' states that buildings should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is regarded as being particularly important for tall buildings.

Buildings A and B are designed as a horse shoe development with communal amenity space located within the centre of the buildings. In terms of scale, Buildings A and B are proposed at upto six storeys in height. Due to the significant level changes across the site, the rear part of the blocks is stepped down from the front of the blocks, but is still six storeys when read from the canal side. Officers do not raise objections to the scale of these buildings in principle. The cross section provided within the Alperton Masterplan indicates buildings at five storeys in height. The increase in scale to six storeys is not considered to be significant or have a harmful impact on the existing residential context.

Further details on the treatment of the elevations for Buildings A and B should be provided to demonstrate that the massing and bulk of the buildings are appropriate.

Building C is five storeys in height and fronts onto Mount Pleasant. Building D is four storeys in height and runs parallel to the canal. At this stage your officers are not convinced on the heights of buildings C and D due to their proximity to the boundary. Officers are concerned that they will appear cramped and have therefore requested further details of how these are viewed from the street and neighbouring site. Likewise, as Building D is located next to the canal, further details should be provided showing the relationship of Building D to the canal.

Once again, further details on the treatment of the elevations for Buildings C and D should be provided to demonstrate that the massing and bulk of the buildings are appropriate.

### **Issue 4**

#### **Density**

London Plan policy 3.4 seeks to optimise housing potential taking into account local context, character, design principles and public transport capacity. The site currently has PTAL rating of 1 to 2. With the improvements that the Council is proposing with better pedestrian connections between the site, and possibly increased frequency of buses along Mount Pleasant, it is noted that the PTAL rating may increase to PTAL 3. It is therefore considered reasonable to apply the density matrix of (200 – 450 hr/ha) if those improvements are implemented.

Buildings A and B propose a density of 504 hr/ha. Whilst this exceeds the density matrix, there is scope for a higher density to be supported subject to the arrangement, scale and form of buildings proposed to be robustly tested at planning application stage with regards to local context, bearing in mind neighbouring residential amenity, quality of accommodation and transport impacts.

Buildings C and D propose a density of 430 hr/ha. This satisfies London Plan policy being within the appropriate density range, however notwithstanding this the arrangement, scale and form of buildings proposed to be robustly tested at planning application stage with regards to local context, bearing in mind neighbouring residential amenity, quality of accommodation and transport impacts.

### **Issue 5**

#### **Relationship to the canal and public realm considerations**

The site that contains Buildings A and B will also proposed an area of public open space along the canal. This is considered acceptable in principle. During the pre-application stage, your officers recommended that the wings of Buildings A and B are set back to allow a better relationship with the public open space. As part of the planning application, visuals will be provided to explain how the pocket park would work in relation to the wings of the building. This will also include information on how the ground level balconies will be treated to differentiate and provide privacy form the pocket park on the same level.

Any forthcoming planning application will need to include a detailed landscape strategy that shows the quality of the public open space along the canal and the quality of the footpaths. The massing diagrams show a blank wall between the podium garden and public open space. This will need to be addressed to provide visual interest.

The planning application should provide further information on the quality and usability of the footpath between building D and the canal. This should include the use of recessed balconies due to the tightness with the canal.

The massing plans suggest the flank elevations of blocks A and B are blank. These should contain habitable room windows that overlook the canal.

The scheme is proposing a new public footpath along the western end of the site which will provide access down to the canal and the pocket park. This is acceptable in principle, but further information should be provided at the application stage on how the western elevation of Building A will be treated to provided as much natural surveillance as possible and include an attractive elevation at ground level. The information should also set out details on how this footpath will be designed to provide defensible spaces to the residential units together with new tree planting along the length of the footpath.

Your officers have raised concerns with the splayed angles of the windows to Building C. Subject to 10m being maintained to the middle of the public footpath, these windows should face directly onto the footpath to provide as much surveillance as possible. This matter will need to be looked at in more detail by the applicant as part of the application stage.

Given the ecological status of the canal, an ecology assessment is required to be submitted with the planning application.

## **Issue 6**

### **Relationship with neighbouring sites**

As the two sites lies within a wider SSA, the applications will need to demonstrate that they will not compromise the ability of the rest of the SSA or the adjoining SSAs coming forward for redevelopment. The plans suggest that 10m is maintained from Blocks A and B to the boundaries with the industrial units to the west and to the boundary with the Liberty Centre. This is acceptable as it meets the requirements of SPG17. Likewise a distance of 10m is maintained from Blocks A and B to the Liberty Centre.

Building C does not provide a 20m distance to the Liberty Centre. Your officers recommend that Building C maintains a 10m distance to the middle of the public footpath. This information should be provided at the application stage, together with indicative details of how the Liberty Centre can come forward for redevelopment at a later stage.

Your officers have raised concerns with the tightness of Buildings C and D to the adjoining sites that are within the SSA. Whilst it is noted there are no windows on these elevations to overlook the neighbouring sites, consideration has to be given to the impact of buildings C and D close to the boundary and the impact of these buildings on the delivery of the wider SSA. SPG17 requires new buildings to sit within a line drawn at 45 degree from the neighbouring site (measured at 2m high from neighbouring ground level). If the new buildings fail this requirement it will need to demonstrate that the adjoining site achieves BRE requirements for residential development and the buildings do not appear overbearing. Likewise, if Buildings A and B also fail 45 degree line as set out within SPG17, it will need to demonstrate that the adjoining site achieves BRE requirements for residential development. This is to ensure that the proposals do not compromise the delivery of the wider SSA and neighbouring SSA.

## **Issue 7**



## **Quality of proposed accommodation**

The internal floor area of the residential units should comply with the details set out within the Mayor's Housing Standards - Minor Alterations to the London Plan (March 2016). Likewise, 10% of units should be wheelchair accessible (part M4(3)) and the remainder designed to comply with part M4(2). This information will need to be set out as part of the planning application.

SPG17 requires each residential unit to have access to 20sqm of external amenity space. This can be provided in the form of private balconies/terraces together with access to a communal amenity space. Details clearly showing how this amenity space has been calculated should be provided as part of the planning application.

The scheme should also provide sufficient levels of playspace for children as required by the London Plan. Once again, these details should be provided with the planning application.

There should be sufficient defensible spaces between the ground floor/podium level units and the footpaths, canal frontage and podium garden. This is to ensure that these units maintain sufficient levels of privacy.

The residential entrances should be clearly legible and overlooked. It is noted that buildings C and D are accessed via the public footpath and further consideration should be given to these residential entrances. Officers have suggested that entrances to the ground floor units are provided at street level, and this matter is being explored by the agent. Likewise, officers have raised concerns with bins/bikes being along the Mount Pleasant frontage for Building C and this matter will be explored in more detail by the agent to see if this can be rearranged.

Details of access arrangements to the podium garden should also be provided.

The distance between the units in Buildings A and B that face into the podium garden should be 20m in line with SPG17. If a shortfall is proposed it should be clearly demonstrated that the privacy of the units in question will not be compromised. Likewise, information should be submitted with the application to demonstrate that all units within Buildings A, B, C and D receive sufficient levels of daylight and the communal amenity spaces receive sufficient levels of daylight and sunlight.

It is noted that the scheme involves a number of single aspect units. A large number face onto the neighbouring industrial estates and over the entrance to the basement car park. A noise assessment will need to be undertaken to demonstrate that the residential units are not adversely impacted by the adjoining industrial operations and basement car park.

It is noted that there are a number of north facing single aspect units. These should not be three bedroom units and information should be provided to demonstrate that they received good levels of daylight and ventilation.

Officers in Environmental Health have advised that they have received complaints from local residents regarding noise during the evening with people using the existing public footpath. The new residential units in Building C will need to be sensitively designed to take this into account.

## **Issue 8**

### **Highway works, parking strategy and servicing**

#### *Parking*

Both applications should provide 0.6 parking spaces per unit. This is in accordance with the Alperton Masterplan, and takes into account the low PTAL of the site and no CPZ in the area. All wheelchair units should have access to widened car parking spaces. 20% of spaces should have active EVCP and another 20% should have passive EVCP, to comply with London Plan standards.

The scheme will also be subject to the removal the rights of residents, businesses and visitors within the development to be entitled to apply for parking permits in the event that a CPZ is introduced in the future, together with contribution towards a CPZ if this is introduced in the future.

Your officers note that the access into the basement car park looks very tight. Further analysis should be undertaken together with tracking plans.

A Transport Assessment will need to be submitted with any forthcoming application.

Bicycle parking should accord with London Plan standards.

#### *Servicing and refuse*

Details of servicing for the commercial units needs to be provided. Consideration also needs to be given to residential servicing such as home shopping vans.

Your officers have advised the applicant that refuse arrangements must be considered at the early stages of the design. The capacity of the stores and carrying distances for refuse collection should comply with Brent's Householder Waste Collection Strategy.

### **OTHER CONSIDERATIONS**

#### *Environmental Health*

Officers in Environmental Health have requested a Noise Impact Assessment due to the proximity to the nearby industrial uses.

As the site is located within an Air Quality Management Area (AQMA), any forthcoming application should be accompanied by an Air Quality Assessment.

Due to previous uses on the site, any forthcoming application should be accompanied by a Land contamination/site investigation works.

Consideration also needs to be given to the nearby substation both in terms of electromagnetic radiation (EMF) and noise/vibration. Residential properties should normally be kept 10m away from the substation.

#### *Sustainability Requirements*

The London Plan currently applies a 35% carbon reduction target beyond Part L 2013 of the Building Regulations. Within the GLA's revised energy assessment, it explains that this will change for new development from 1 October 2016, which requires schemes submitted on or after 1 October 2016 to achieve Zero Carbon (as defined by the Housing SPG) for residential developments and 35% carbon reduction below Part L 2013 for commercial/non domestic development.

The planning application will need to apply evidence on how the demand for cooling will be minimised through passive design in line with Policy 5.9 of the London Plan, and also consider domestic overheating.

The application will need to investigate opportunities for connection to nearby district heating networks and will also need to consider providing a site wide heating network, suitable for connection to wider district network now or in the future. It will need to follow the London Plan's energy hierarchy for CHP and renewable energy.

The application will need to aim to achieve 20% of the carbon reduction achieved through renewable energy, if feasibly possible. Brent Core Strategy also seeks commercial developments to achieve BREEAM excellent. In addition to the above, the scheme is required to meet water efficiency targets of 105 litres per person per day.

Any forthcoming application will need to be accompanied with a Sustainability Strategy that addresses the above.

The scheme should demonstrate how it meets the requirements set out in the Mayor's Sustainable Drainage Hierarchy.

## **PLANNING OBLIGATIONS**

In accordance with the Councils Planning Obligations SPD, the proposal would be likely to attract the following obligations to mitigate the impact of the development:

- Affordable Housing - Final proportion to be subject of detailed financial viability assessment.
- Employment and training opportunities during construction
- Parking Permit Restricted development to remove the rights of residents to apply for parking permits in the surrounding roads in the vicinity of the site
- Join and adhere to Considerate Constructors scheme
- Energy - Achieve a 35% reduction in CO2 emissions beyond the 2013 Building Regulations or Zero Carbon for residential development (depending on when the application is submitted) together with a water efficiency target of 105 litres per person per day and BREEAM excellent for the commercial units
- Submission and approval of a commercial and residential Travel Plan to score a PASS rating under TfL's ATTrRuTE programme prior to first occupation, to include provision of a subsidised Car Club membership for future residents and to fully implement the approved plan for the lifetime of the development thereafter.
- Undertaking of on and off site highway works through an agreement under S38/S278 of the Highways Act 1980 (N.B. the precise nature of highway works necessary to be confirmed at application stage).
- Contribution towards bus improvements – amount to be agreed with TfL
- Contribution towards a local Controlled Parking Zone
- Affordable workspace - set out 50% reduction on market rates

### **Community Infrastructure Levy (CIL)**

The proposed development would be CIL liable development. The amount of liability this would attract will be confirmed at a later stage when the precise quantum of development is known.

## **CONCLUSIONS**

Members should note the above development is still in the pre-application stage and that additional work remains to be carried out as discussed above.