

COMMITTEE REPORT

Planning Committee on
Item No
Case Number

15 November, 2017
04
17/3318

SITE INFORMATION

RECEIVED	26 July, 2017
WARD	Sudbury
PLANNING AREA	Brent Connects Wembley
LOCATION	80, 82 & 84 Harrowdene Road, Wembley, HA0 2JF
PROPOSAL	Outline application for the demolition of the existing 3 buildings at 80, 82 & 84 Harrowdene Road, HA0 and erection of a 4 storey detached building with basement, comprising 33 self-contained flats (2 x 1 bed, 28 x 2 bed, 3 x 3 bed) with associated parking, cycle store, refuse storage, landscaping and communal amenity space
APPLICANT	Mr MARLPARK HOMES LTD
CONTACT	DS Sqaured Architects
PLAN NO'S	Existing block site plan (Drawing No 17012 01.01) Existing context (Drawing No 17012 01.12) Proposed ground floor plan (Drawing No 17012 02.01 Rev A) Proposed basement and first floor plan (Drawing No 17012 02.02) Proposed second and third floor plan (Drawing No 17012 02.03) Proposed roof plan (Drawing No 17012 02.04) Design and access statement
LINK TO DOCUMENTS ASSOCIATED WITH THIS PLANNING APPLICATION	<p><u>When viewing this on an Electronic Device</u></p> <p>Please click on the link below to view ALL document associated to case https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=DCAPR_135542</p> <p><u>When viewing this as an Hard Copy _</u></p> <p>Please use the following steps</p> <ol style="list-style-type: none">1. Please go to pa.brent.gov.uk2. Select Planning and conduct a search tying "17/3318" (i.e. Case Reference) into the search Box3. Click on "View Documents" tab

RECOMMENDATIONS

Resolve It is recommended that this planning application is refused for the reason stated below:


1. Impact on the character of the area and the streetscene
2. Inadequate provision of family sized homes
3. Inadequate provision of Affordable housing
4. Impact on the amenities of adjoining residents
5. Poor standard of accommodation for the proposed homes
6. Failure to demonstrate appropriate levels of carbon reduction, water use or that the scheme will be air quality neutral
7. Failure to demonstrate that the basement will not be affected by flooding, or that the scheme will not result in surface water flooding elsewhere
8. Failure to demonstrate that the proposal will not impact significant trees, including a tree that is subject to a Tree Preservation Order
9. Insufficient provision of cycle parking and inappropriate location of the refusal storage area

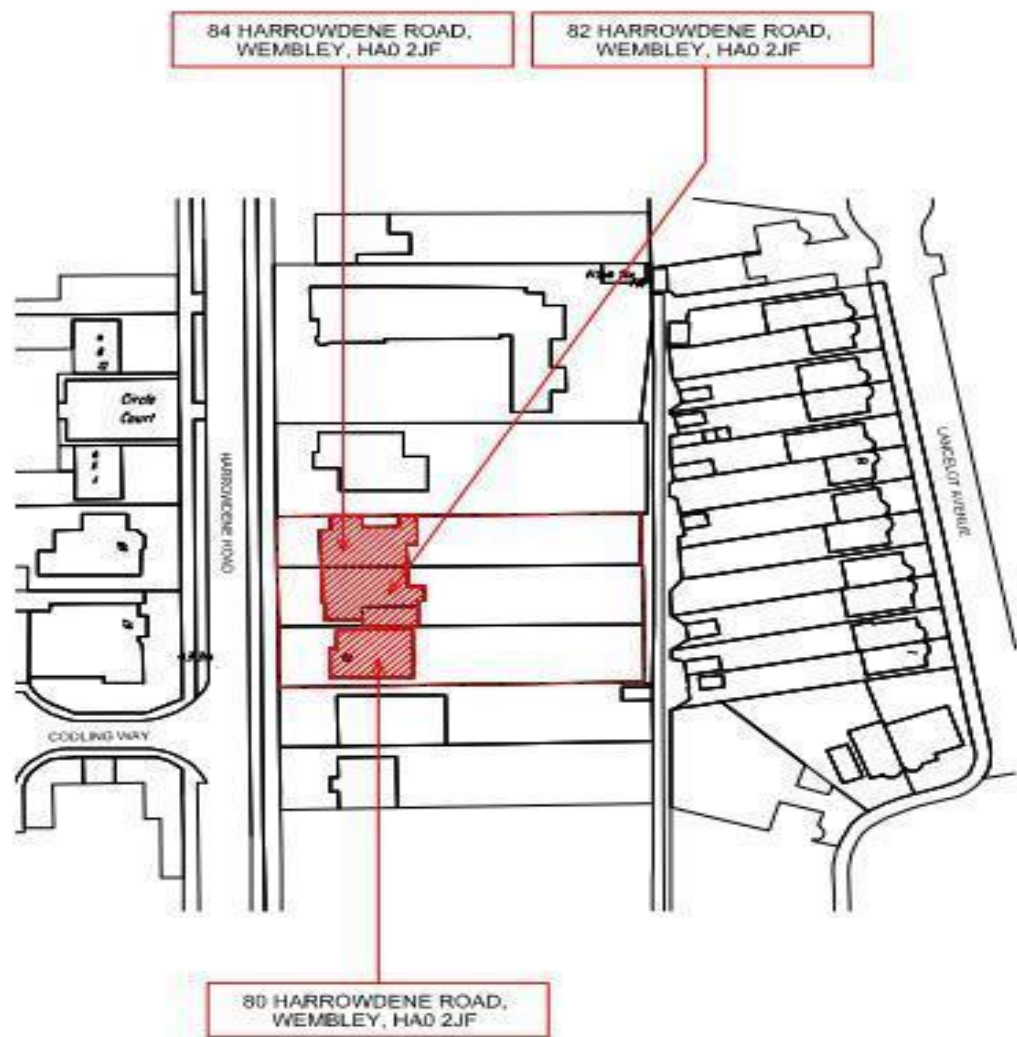
That the Head of Planning is delegated authority to issue the decision notice and impose informatives pursuant to the following matters:

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 vary the reasons for 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

	<p>Planning Committee Map</p> <p>Site address: 80, 82 & 84 Harrowdene Road, Wembley, HA0 2JF</p> <p>© Crown copyright and database rights 2011 Ordnance Survey 100025260</p>
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This map is indicative only.

PROPOSAL IN DETAIL

The proposal is an outline application for the demolition of the existing three dwellinghouses at 80, 82 and 84 Harrowdene Road and the redevelopment of the site to comprise 33 flats (2 x 1bed, 28 x 2bed, 3 x 3bed) in a three-storey detached building incorporating an internal courtyard of 100sqm, with additional accommodation in a mansard roof. A basement level is proposed for car and cycle parking, and refuse storage would be provided at ground floor level, together with 600sqm of communal amenity space to the rear.

This is an application for outline planning permission with all matters reserved. Plans and elevations have been submitted which seek to demonstrate how the proposed number and mix of units could be provided within the application site. However, as all matters are reserved (Access, Appearance, Landscaping, Layout and Scale), the drawings are only indicative, and if outline permission was to be granted, this would be subject to the approval of the Reserved Matters.

The Council is therefore required to consider whether the submission demonstrates that the proposed development (as set out within the description) would be in accordance with relevant planning policies and guidance and could be delivered within the site.

EXISTING

The site comprises three adjoining houses, one detached and one semi-detached pair on the eastern side of Harrowdene Road. The surrounding area is of a suburban residential character, comprising a mixture of two-storey detached and semi-detached houses and some three-storey flat-roofed apartment blocks, with a PTAL rating of 2. None of the buildings are listed and the site is not in a conservation area but it is in an Air Quality Management Area.

SUMMARY OF KEY ISSUES

The key planning issues for Members to consider are set out below. 11 objections have been received regarding some of these matters. Members will need to balance all of the planning issues and the objectives of relevant planning policies when making a decision on the application:

- 1. Objections received:** The objections relate to planning considerations including: the overall density of the development, the size, design and layout of the building; loss of light, privacy and outlook to neighbours; and increased flood risk. These are discussed within the report and officers agree that these impacts, together with other concerns, make the development unacceptable in planning terms.
- 2. Principle of development.** The proposal is considered to be overdevelopment of the site, resulting in an overall density far in excess of that recommended in the London Plan for suburban areas without good access to public transport, which would have an adverse impact on the character of the area, and consequently is unacceptable in principle.
- 3. Housing mix and Affordable Housing.** No Affordable housing is proposed but the proposal is not supported by a Financial Viability Assessment which demonstrates that the maximum reasonable proportion of Affordable Housing will be provided. Furthermore, the proposal would fail to provide an adequate proportion or quality of family-sized dwellings. It is therefore unacceptable in terms of meeting the Borough's housing needs.
- 4. The design, scale and appearance of the building.** The bulk and mass of the building would be excessive in this context, out of scale with the surrounding area and overbearing within the street scene, whilst the indicative design would be confused and incoherent, and the mansard roof form would be excessively bulky and out of keeping with the predominant roofscape and the two-storey flat-roofed rear projection would be excessively bulky, disproportionate and awkward. Overall the design is of poor quality and the proposal is unacceptable in design terms and out of keeping with the suburban character of the area.
- 5. Relationship with neighbouring properties.** The proposal fails to accord with the Council's policies and

guidance and would result in an unduly detrimental loss of outlook and privacy and would appear overbearing when viewed from Nos. 78 and 86 Harrowdene Road.

6. Residential living standards of the proposed units. the proposal is likely to provide poor quality accommodation for residents in terms of internal floorspace, daylight and sunlight, and external amenity space, and would be unacceptable in this respect, failing to accord with relevant policies and guidance.

7. Sustainability. The submission has failed to demonstrate that the proposal would meet sustainability targets, including achieving a zero carbon energy rating and air quality neutral status, and would be unacceptable in this respect.

8. Drainage and flood risk. The application would include basement parking in an area at risk of flooding, and has failed to demonstrate that the development could be made safe, including provision of a safe escape route. The proposal also fails to demonstrate that a surface water will be implemented in accordance with London Plan policy to limit the potential for flooding elsewhere.

9. Impact on trees. There are trees on site including a tree that is subject to a Tree Preservation Order, but has not been accompanied by a tree survey and an arboricultural assessment. As such the submission has not demonstrated that the proposal will not have a significant impact on trees within the site.

10. Highways, servicing and parking. The proposed car parking would slightly exceed the maximum standards, but not to a degree that is likely to result in a material impact on the highway. However, the submission fails to demonstrate that adequate levels of cycle parking can be provided or that bin storage can be provided in an appropriate location and as such, the submission fails to demonstrate that the proposal will not have a material impact on highway flow and safety..

RELEVANT SITE HISTORY

There is no planning history relating to the combined site.

Permission was granted in 1997 (97/1090) for change of use of No 82 from residential to a doctors' surgery, however this use has either not been implemented or has lapsed and there are no public records of a GP practice at this address.

CONSULTATIONS

Press Notice published on 05/10/2017

Site Notice displayed on 25/09/2017

The owners/occupiers of 120 different properties were notified of the application on 08/08/2017 (n.b. 122 on Acolaid includes 2 objectors from outside area notified).

11 letters of objection have been received to date. The concerns raised, and your officers' response or signposting to the appropriate paragraphs in the report, are summarised below:

General concern about overpopulation in the area	See paragraphs 1 – 3
Increased demand for local amenities and schools	All development providing new floorspace is liable for contributions to the Community Infrastructure Levy, which provides funding for infrastructure improvements to support increased demand for local services.
Increased noise, pollution and disturbance	See paragraph 37
Loss of light, privacy, outlook	See paragraphs 12 – 17
Size, design and layout of building – no other four-storey buildings in area – larger than surrounding buildings and higher density	See paragraphs 8 – 11
Bulky fortress-esque structure not harmonious	See paragraphs 8 – 11

with surrounding houses	
Loss of heritage represented by Victorian housing	The site is not in a conservation area and the buildings are not listed or locally listed. The impact of the design on the character of the area is discussed in paragraphs 8 – 11
Effect on suburban character of area – overdevelopment	See paragraphs 1 – 3 and 8 – 11.
Loss of family houses	See paragraph 4
Existing traffic volumes and congestion	See paragraphs 29 – 38
Increase in traffic and congestion	See paragraphs 29 – 38
Traffic safety, including effects on pedestrians	See paragraph 37
On-site parking provision inadequate, does not provide for two-car households and visitors – potential failure of vehicle lifts - impact on on-street parking provision	See paragraphs 29 – 38
Construction traffic, dust, noise and blocking of footpath	See paragraph 37
Increased air pollution in Air Quality Management Area	See paragraphs 23 – 24
Loss of trees at rear boundary line	See paragraph 28
Other flatted developments in area are more spacious	See paragraphs 8 – 11
Increase in surface water run off and flood risk	See paragraphs 25 – 27
Built development contributes to 'urban heat island' effect and global warming	See paragraphs 23 – 24
Impact on wildlife and loss of biodiversity	The site has no ecological designations. Detailed proposals to enhance biodiversity could be assessed under reserved matters.
Increase in litter and anti-social behaviour	Details of adequate waste storage provision and compliance with Secure by Design principles could be required under reserved matters to resolve these concerns.
Opportunities for crime	Compliance with Secure by Design principles would be required to resolve these concerns.
Loss of views	This is not a material planning consideration.
Effect on neighbouring property values	This is not a material planning consideration.
Extent of consultation	Adjoining neighbours were notified by letter, and the application was advertised more widely through a site notice and press notice, in accordance with planning legislation. Comments are accepted from any members of the public.

Internal consultations:

Lead Local Flood Authority: The site is in Flood Zone 1 and a Critical Drainage Area. There is widespread flooding in this area and a number of properties are flooded frequently, mainly due to inadequate capacity in the public sewer. The basement car park will be flooded during heavy rain and may put lives at risk. A Flood Risk Assessment and details of surface water management will be needed with the full planning application, demonstrating a safe escape route, sustainable urban drainage measures and control of surface water discharge to reduce the risk of flooding.

POLICY CONSIDERATIONS

For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the Development Plan in force for the area is the 2010 Brent Core Strategy, the 2016 Brent Development Management Policies Document, the 2015 Wembley Area Action Plan and the 2016 London Plan (Consolidated with Alterations since 2011).

The following are also relevant material considerations in the determination of the current application:

- National Planning Policy Framework 2012 (NPPF)
- Planning Practice Guidance (PPG)
- Mayor's Housing Supplementary Planning Guidance 2016
- London Borough of Brent Supplementary Planning Guidance 17 Design Guide For New Development
- London Borough of Brent Supplementary Planning Document S106 Planning Obligations

In addition, the emerging Draft Brent Design Guide SPD1 has been subject to public consultation and once adopted will supersede SPG17. This document also carries some weight in the determination of planning applications at this time.

DETAILED CONSIDERATIONS

Principle of development

1. The site is previously developed land in existing residential use, in a primarily residential area. Residential redevelopment of the site is supported by Core Strategy Policy CP2 and by the London Plan Policy 3.3, which supports sensitive renewal of existing residential areas, and Policy 3.4 which seeks to optimise housing output within the relevant density range.
2. The residential redevelopment of the site is considered to be acceptable in principle. However, development proposals must have regard to the aim of directing higher density development towards areas which are most accessible by public transport. Recommended density ranges for residential development are set out in the London Plan Policy 3.4 and reinforced by Core Strategy Policy CP6. For areas with a suburban character and medium public transport accessibility (PTAL 2 to 3), densities of 150-250 habitable rooms per hectare are considered appropriate (or 55-145 units per hectare if units have an average of 3.1-3.7 habitable rooms). The proposal does not specify layouts, however the total number of habitable rooms would be a minimum of 100 (number of bedrooms plus shared kitchen and living space). Based on this, the proposed development would have a substantially higher density of 476 habitable rooms per hectare or 157 units per hectare, which is considerably above the London Plan density ranges. However, the London Plan density matrix only provides an indication of the target densities for a site and actual site capacity must be based on the site specific circumstances.
3. The application is supported by indicative drawings which seek to demonstrate that the proposed number of units can be provided successfully within the site, having regard to all material planning considerations. This is discussed in detail later in this report. However, in summary, the submitted drawings do not demonstrate that the proposed number of units can successfully be delivered within the site and the development as shown within these drawings is considered to be detrimental to the suburban character of the area. As such, whilst the principle of the residential dwellings within this site is acceptable, the submission fails to demonstrate that the proposal can result in a development that is not detrimental to the suburban

character of the area and this is contrary to policies CP17 and DMP1.

Housing mix and Affordable Housing

Housing mix

4. Core Strategy Policy CP21 seeks an appropriate mix of accommodation types and sizes, and Policy CP2 specifies that at least 25% of new housing units should be family-sized units having three or more bedrooms. The proposal would not comply with these policies, as it would lead to the loss of three family-sized houses and the proportion of 3 bed units proposed would be only 9% of the total number of units. Furthermore, the proposed 3 bed units would all be of minimum space standards, and located on the upper floors with no direct access to the rear garden, and are considered on this basis to offer poor quality family accommodation.

Affordable Housing

5. Core Strategy Policy CP2 aims for 50% of new housing to be affordable, and Policy DMP15 seeks affordable housing on sites with the capacity to provide 10 or more homes, subject to economic viability. This is reinforced by policy DMP15 which also specifies that the ratio of Affordable Rented to Intermediate Affordable Housing should be 70:30. These policies are in conformity with London Plan policies 3.12 and 3.13 which also seek the maximum reasonable proportion of Affordable Housing.

6. For the proposed development to comply with these policies, 16 or 17 affordable units should be provided, or a viability appraisal should be submitted to justify a lower level of provision. No affordable housing provision is proposed and no viability appraisal has been submitted.

7. The proposal therefore fails to accord with Policies CP2, DMP15, 3.12 and 3.13, as it fails to either propose 50 % Affordable Housing or demonstrate that the proposal will deliver the maximum reasonable proportion of Affordable Housing, and fails to demonstrate an appropriate mix of Affordable Housing. The provision of affordable housing is fundamental to the acceptability of a scheme of this size, and outline permission should not be granted without a clear agreement on this provision being reached. The application has therefore failed to demonstrate that it complies with these policies in making adequate provision for affordable housing.

The design, scale and appearance of the building

8. The NPPF states that design should respond to local character and history and that permission should be refused for development of poor design. Core Strategy Policy CP17 aims to protect suburban areas from inappropriate infilling of plots with out-of-scale buildings that fail to respect the settings of existing dwellings.

9. The indicative drawings show a four-storey flatted block, with the external walls of the third floor set back from the external walls of the lower floors. The indicative block is shown to be set 1 m from the side boundaries of the site with the front wall between approximately 7 m to 10 m back from the front boundary with "bays" projecting forward of this. A two-storey element of the building is shown to project 25.5 m to the rear of the rear wall of No. 86 and 22.5 m rearward of the extension to No. 78, projecting to approximately 10 m from the rear boundary of the site. The second floor is shown to project 11.8 m and 8.8 m to the rear of No.s 86 and 78 respectively. Parking is indicated at basement level. The proposed building projects significantly rearward of the building line of the existing and surrounding developments with the exception of No. 88 Harrowdene Road. However, that property is not considered to represent the prevailing character of the area, and the development shown in the indicative drawings is considered to result in significant harm to

the suburban character of the area.

10. The existing houses on the site, particularly the semi-detached pair, are greater in height than their immediate neighbours, and there are three storey buildings with pitched roofs in the vicinity. The indicative building is shown to be 11.4 m in height whilst the adjoining buildings are shown to reach maximum heights of 10.2 and 9.2 m. However the character of the area is predominantly one of detached and semi-detached houses with hipped roofs and separated by garages, with the combination of these features providing a sense of spaciousness at first floor level and across the roofscape. Whilst there are some three-storey flatted developments in the area, these are spaciouly laid out on much larger sites than the application site. In comparison, the proposal would present an unrelieved mass of built form that would appear cramped on the site, would be out of scale with the surrounding area and would appear overbearing within the street scene, whilst the mansard roof would be of a bulky and awkward design that would not be in keeping with the predominant hipped and gable roof forms. The two-storey flat roofed rear projection would also appear excessively bulky, disproportionate and unrelieved by any architectural features.

11. Although detailed design proposals would be dealt with under reserved matters, the overall bulk, mass and arrangement of built form shown in the indicative drawings is considered to represent poor quality design that could not be significantly improved by detailed design, and consequently the proposal is unacceptable in design terms. The submission does not demonstrate that the proposed number and size of units can be provided within a scheme that pays an appropriate regard to the scale, nature and prevailing patterns of development in the area.

Relationship with neighbouring properties

12. The impact of proposed development on neighbours is also a material consideration, and policy DMP1 seeks to ensure that this is acceptable.

Light and outlook

13. The proposal has been considered having regard to the requirements of SPG17 and draft SPD1 which set out that that new developments should be set under a 45 degree line from a 2m height at the rear boundary and a 30 degree line from neighbouring rear habitable room windows. The proposed building projects beyond the rear wall of the extension to No. 78. A two-storey element is situated 1.05 m from the boundary and would significantly fail to comply with the 45 degree guidance. A 3-storey element of the building would project 3.7 m rearward of the rear wall of No. 86 and would therefore adjoin the garden of that property. This is set 1.05 m from the boundary and again would significantly fail to comply with the 45 degree guidance. Whilst the drawings are indicative only, they fail to demonstrate that the proposed number of mix of units can be achieved on the site.

14. The proposed building also projects significantly beyond the rear wall of the adjoining houses as discussed above. Given the suburban nature of the adjoining sites, the proposal would lead to a substantial loss of outlook to both adjoining properties at Nos 86 and 78 Harrowdene Road, and would appear overbearing and overly dominant to occupants of those properties, due to the depth and height of the two-storey rear projection.

15. The application has not been supported by a daylight sunlight assessment to demonstrate that the impact on neighbouring properties would be acceptable. This issue relates to the height, scale and bulk of the proposed building and could not therefore be addressed under reserved matters following a grant of outline permission.

Privacy and overlooking

16. The indicative drawings show the overall locations and sizes of flats within the indicative scheme, but not the room layouts. As such, assumptions must be made regarding the location and nature of rooms and windows and whether the proposal demonstrates accordance with SPG17 and draft SPD1. The distance to the rear boundary achieves the 10 m minimum and the 20m to the nearest rear habitable room windows of properties on Lancelot Avenue are also achieved with the indicative scheme. A 10 m distance to the boundaries would also be achieved from the two-storey rear projection.

17. However, many other flats would rely upon habitable room windows facing the boundaries at short distances (some down to 1m to 3m). For ground floor units this would result in a poor outlook for the corresponding room. For upper floor windows this would result in overlooking onto neighbouring properties and their rear gardens. It is not clear whether any sole habitable room windows would face the internal courtyard / atrium, which would provide a poor outlook from those windows and potentially poor levels of privacy. Whilst the submitted drawings are indicative only, they suggest that unduly detrimental levels of overlooking will occur and do not demonstrate that the proposed number of units could be delivered without resulting in such impact.

Conclusion

18. The proposal would cause substantial loss of outlook and would appear overbearing when viewed from both adjoining properties (No. 78 and 86) and a significant loss of privacy for both adjoining residents. Consequently the proposal is unacceptable in terms of its impact on neighbouring properties, contrary to policy DMP1, SPG17 and draft SPD1.

Residential living standards of the proposed units

19. London Plan Policy 3.5 and the Mayor's Housing SPG set out minimum internal floor space requirements for new housing. The latter also seeks to avoid single aspect units, particularly where these would be north-facing. Brent Policy DMP19 requires 50sqm of external amenity space for 3bed flats and 20sqm for 1bed and 2bed flats whilst the Mayor of London Housing SPG specifies minimum sizes for balconies.

20. Whilst the scheme is in outline, unit sizes have been specified within the submission and shown within the indicative drawings. Of the 33 proposed flats, 21 would fail to comply with the minimum internal space standards. Furthermore the proposal does not confirm the provision of any wheelchair accessible units. No daylight sunlight assessment has been submitted to demonstrate that habitable rooms would receive adequate amounts of daylight and sunlight. No internal layouts have been provided, however most flats would be single-aspect, with some having only side-facing outlook (including north-facing units which would receive poor levels of daylight as a result) or very limited outlook which would result in some habitable rooms having no external windows at all. Although internal layouts could be dealt with under reserved matters, the submission does not demonstrate that a satisfactory standard of accommodation could be achieved.

21. The indicative drawings show amenity space provision comprising a communal rear garden of 600sqm and an internal courtyard of 100sqm, the latter being mostly open to the sky but enclosed by the four stories of the building and more likely to serve as an access than a usable amenity space. It is considered that this cannot be treated as amenity space of a suitable quality. For a development of this size and housing mix (notwithstanding the shortfall of family sized units which would increase this requirement), a total of 750sqm amenity space would be required to comply with Policy DMP19. There accordingly is a shortfall of 150 sqm and the proposal does not accord with policy DMP19. Furthermore, no play space has been proposed and the proposal fails to demonstrate compliance with London Plan Policy 3.6.

22. Overall, the proposal is likely to provide poor quality accommodation for residents in terms of internal floorspace, daylight and sunlight, and external amenity space, and would be unacceptable in this respect, contrary to Policy 3.5, 3.6, 3.8, DMP1, DMP18 and DMP19, the Mayor's Housing SPG, the Mayor's SPG regarding Play and Informal Recreation and the national Technical Housing Standards.

Sustainability Assessment

23. Core Strategy Policy CP19 requires a Sustainability Statement for major housing proposals or those in Air Quality Management Areas. This should demonstrate how the proposal will meet London Plan targets set out in Policies 5.2 and 5.3, with Policy 5.2 specifically requiring new housing from 2016 to achieve a zero carbon energy rating. London Plan Policy 7.14 requires proposals in Air Quality Management Areas to be at least 'air quality neutral' and this should be demonstrated through an air quality assessment.

24. The application has not been supported by the information demonstrating that the proposal will comply with the requirements of the London Plan Policies 5.2, 5.3 or 7.14 or Core Strategy Policy CP19. The overall scale, bulk and density of the development is considered to be a fundamental factor influencing its sustainability, and therefore this issue could not be dealt with under reserved matters following a grant of outline permission.

Drainage and flood risk

25. The site is in Flood Zone 1 but is in a designated Critical Drainage Area which has a history of widespread and frequent flooding due to inadequate capacity in the public sewer. The proposed basement car park would be at risk of flooding during heavy rain, which may put lives at risk without information demonstrating that this will be safe.

26. A Flood Risk Assessment and details of proposed sustainable urban drainage measures and the control of surface water discharge would be required to demonstrate that the development could be drained effectively and could be made safe from the risk of flooding, including provision of a safe escape route. This information has not been provided and it is considered that the application has failed to demonstrate that the proposal complies with the relevant requirements in London Plan Policies 5.12 and 5.13, and Brent Policies DMP9A and DMP9B.

27. The council's drainage engineer has requested this information under reserved matters, however your officers consider that these concerns relate to the basic layout and overall scale of the proposed development. Therefore outline permission should not be granted unless it can be clearly demonstrated that the development can be made safe and this issue could not be dealt with under reserved matters following a grant of outline permission.

Impact on trees

28. Objections have been received relating to the potential loss of trees in the rear gardens of the three houses. There are trees situated within the site, one of which is subject to a Tree Preservation Order. The application has not been accompanied by a tree survey and arboricultural impact assessment and as such, the potential impact of the proposed development on the trees within the site cannot be considered. This is contrary to policy DMP1.

Highways, servicing and parking

29. The current site comprises three 4bed houses, of which one has a garage and all three have parking in the front garden. There are four vehicular crossovers, the central house (No 82) having two and the other houses one. Harrowdene Road is a local distributor road and is not classified as heavily parked. Residents' permits are required to park on the street on Wembley Stadium event days but on-street parking is otherwise unrestricted. The site has low accessibility to public transport, with a PTAL rating of 2.

Car parking

30. Car parking standards for residential developments are given in Appendix 1 of the DMP, and cycle parking standards in the London Plan.

31. The proposed development would have a parking allowance of 34.5 spaces. The plans indicate that parking would be provided in the basement car park, comprising 36 spaces using 18 double-deck car stackers, two disabled spaces adjacent to the fire escape core, and two motorcycle parking spaces.

32. The proposed parking spaces exceed the maximum standards. However, the 3.5 additional spaces (beyond the standards) is unlikely to result in a material impact on the local highway network. Electric vehicle charging points would need to be incorporated into the layout for up to 40% of spaces (20% active and 20% passive). However, this could be secured by condition if permission were granted.

Cycle parking

33. A total of 21 cycle spaces have been indicated in the basement within a small (4.8 m x 4.1 m) area, which would provide a secure and covered location to protect against theft and weather. However, to comply with London Plan requirements, 2 cycle spaces per 2+bed unit and 1 cycle space per 1bed unit are required. Therefore a total of 64 cycle spaces would be required for the proposed development. Whilst the plans are only indicative, given the issues discussed within this report regarding the scheme, there is no certainty that the additional spaces could be provided. The access ramp would need to be safe for cyclist use and this would need to be demonstrated.

Access

34. Ramped access to the car park is indicated as being provided from the street, and the remainder of the site frontage is shown as being landscaped, which is welcomed as contributing to natural drainage. The retained crossover would need to be widened, the three remaining crossovers reinstated to footway and the line markings adjusted to provide new on-street parking bays, in addition to amendments to Traffic Regulation Orders, at the applicants' expense under a Section 278 Agreement if planning permission were granted.

35. Further information would be required under reserved matters, to demonstrate that the basement would be deep enough to accommodate the height of the car stackers, that the basement access and ramp would be a minimum of 4.1m wide plus 300mm margins to allow two vehicles to pass at the access and on the ramp, and that sufficient sight line visibility would be provided at the access and particularly where the ramp meets the public footway. Vehicular tracking paths would be required to show that the parking spaces would be accessible and that there would be sufficient space for manoeuvrability. Further details of ramp gradients would be required and would need to be in compliance with recommended design guidance published by IStructE, with a maximum gradient of 5% within 4m of the highway boundary.

Servicing

36. The development would require a large volume of bin storage, and full details of proposed storage would be required under reserved matters. A bin storage area is shown to the side of the building,

however this would be over 20m from the highway and consequently would not be sufficiently accessible as such areas should be no more than 10 m from the collection point (the highway). Whilst a bin storage area could potentially be provided within the ground floor of the building, the above concerns already demonstrate that the proposed number of units are unlikely to be able to be accommodated within this site and as such, there is no certainty that the bin store could be located into an alternative location.

Construction

37. A Construction Logistic Plan (CLP) would be required by condition prior to the commencement of any demolition or construction work on site, which could be secured through condition if consent was to be granted

Highways Conclusion

38. The submission fails to demonstrate that refuse and cycle storage can appropriately be provided within the development. In the absence of such detail and given the matters raised above, there is no certainty that these can be appropriately provided.

Conclusion

39. Whilst officers note that the scheme would provide new housing in an established residential area, the benefits would not outweigh the significant resultant harm of the scheme to the character and appearance of the area or the residential amenity of neighbouring properties. Furthermore, the proposal would offer a poor standard of accommodation for future residents and to be unacceptable in terms of housing mix and affordable housing provision, and the application has failed to demonstrate that it would be acceptable in terms of the impact on trees, highway flow and safety, sustainability, drainage and flood risk.

40. In summary, the proposal would be unacceptable on a number of grounds and it is not considered that these concerns could potentially be resolved under reserved matters following grant of outline permission. Officers recommend the application for refusal for the reasons set out in the draft decision notice.

CIL DETAILS

This application is liable to pay **£1,028,728.76*** under the Community Infrastructure Levy (CIL).

We calculated this figure from the following information:

Total amount of eligible** floorspace which on completion is to be demolished (E): sq. m.

Total amount of floorspace on completion (G): 3858 sq. m.

Use	Floorspace on completion (Gr)	Eligible* retained floorspace (Kr)	Net area chargeable at rate R (A)	Rate R: Brent multiplier used	Rate R: Mayoral multiplier used	Brent sub-total	Mayoral sub-total
Dwelling houses	3858	383	3475	£200.00	£35.15	£874,955.36	£153,773.40

BCIS figure for year in which the charging schedule took effect (Ic)	224	224
BCIS figure for year in which the planning permission was granted (Ip)	282	
Total chargeable amount	£874,955.36	£153,773.40

*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: 17/3318

To: Mr Shah
DS Sqaured Architects
Multicom House
2 Spring Villa Road
Edgware
HA8 7EB

I refer to your application dated **26/07/2017** proposing the following:

Outline application for the demolition of the existing 3 buildings at 80, 82 & 84 Harrowdene Road, HA0 and erection of a 4 storey detached building with basement, comprising 33 self-contained flats (2 x 1 bed, 28 x 2 bed, 3 x 3 bed) with associated parking, cycle store, refuse storage, landscaping and communal amenity space

and accompanied by plans or documents listed here:
Existing block site plan (Drawing No 17012 01.01)

Existing context (Drawing No 17012 01.12)

Proposed ground floor plan (Drawing No 17012 02.01 Rev A)

Proposed basement and first floor plan (Drawing No 17012 02.02)

Proposed second and third floor plan (Drawing No 17012 02.03)

Proposed roof plan (Drawing No 17012 02.04)

Design and access statement

at **80, 82 & 84 Harrowdene Road, Wembley, HA0 2JF**

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: 02/11/2017

Signature:

Alice Lester
Head of Planning, Transport and Licensing

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 and no pre application discussions were entered into.

REASONS

- 1 The submission fails to demonstrate that the proposed development can be delivered within the application site within a building that pays an appropriate regard to the prevailing character, the patterns of development and the massing and forms of development in the area. The proposal would result in significant harm to the streetscene and the suburban character of the area, contrary to the National Planning Policy Framework, Policy DMP1 of the Brent Local Plan Development Management Policies 2016 and Policy CP17 of the Brent Core Strategy 2010.
- 2 The proposal, by reason of the inadequate provision of family sized (3+ bedroom) dwelling and the poor quality of the family sized dwellings within the indicative proposals, would result in the loss of good quality family sized accommodation for which there is an identified need in the borough and replacement with poor quality family sized accommodation together with a failure to provide additional family sized homes, and thus is contrary to Policy CP2 and CP21 of the Brent Core Strategy 2010 and policy DMP16 of the Brent Local Plan Development Management Policies 2016.
- 3 The proposal failures to propose at least 50 % Affordable Housing or submit a Financial Viability Assessment demonstrating that the maximum reasonably proportion of Affordable Housing will be provided and as such, fails to demonstrate that the proposal will meet identified housing need within the borough and within London as a whole. This is contrary to the National Planning Policy Framework, Policy CP2 of the Brent Core Strategy 2010, Policy DMP15 of the Brent Development Management Policies 2016, policies 3.12 and 3.13 of the London Plan 2016 and the Mayor of London Affordable Housing and viability SPG 2017.
- 4 The submission fails to demonstrate that the proposed development will have an appropriate relationship with adjoining sites and the indicative scheme demonstrates that the proposal is likely to have an unduly detrimental impact on the amenities of Nos. 78 and 86 Harrowdene Road by way of a loss of outlook, loss of privacy and an overbearing appearance. This is contrary to Policy DMP1 of the Brent Development Management Policies 2016, Supplementary Planning Guidance No. 17 and draft Supplementary Planning Document 1.
- 5 The submission fails to demonstrate that an appropriate standard of residential accommodation will be provided for future occupants of the development, and the indicative scheme shows that a poor standard of accommodation is likely to be provided by virtue of the inadequate levels of internal floorspace, inadequate provision of external amenity space, excessive proportion of north facing units, failure to demonstrate adequate levels of daylight and sunlight will be achieve, failure to demonstrate that adequate levels of play space will be provided and failure to demonstrate that an adequate proportion of wheelchair accessible or easily adaptable units will be provided. As such, the proposal is contrary to Policy 3.5, 3.6 and 3.8 of the London Plan 2016, Policy DMP1 and DMP18 and DMP19 of the Brent Development Management Policies 2016, the Mayor's Housing SPG, the Mayor's SPG regarding Play and Informal Recreation and the national Technical Housing Standards.
- 6 The submission fails to demonstrate that the proposal can achieve an appropriate level of carbon reduction or water use, or demonstrate that the development will be air quality neutral and as such, is likely to contribute to unduly contribute towards climate change, will not adequately reduce water use and will result in adverse air quality, contrary to policy 5.2, 5.3,

5.15 and 7.14 of the London Plan and Policy CP19 of the Brent Core Strategy 2010.

- 7 The application site is located in a designated Critical Drainage Area which has a history of flooding but fails to demonstrate that the proposed basement parking area will be safe, or the the surface water run-off from, the site will be accommodated in an appropriate way including the consideration of the use of SuDS to reduce the risk of flooding elsewhere. As such, the proposal fails to demonstrate compliance with policies 5.12 and 5.13 of the London Plan 2016 and policies DMP9A and DMP9B of the Brent Development Management Policies 2016.
- 8 The proposal fails to identify the significant trees within the site which includes one tree that is the subject of a Tree Preservation Order or demonstrate the potential impact of the proposed development on those trees or any mitigation for trees that are proposed to be lost. In the absence of such information, the proposal fails to demonstrate the appropriate consideration, retention or replacement/enhancement of existing significant trees which are likely to be affected by the development and as such is likely to result in the loss of such trees to the detriment of the character of the area and local ecology and biodiversity. This is contrary to Policy DMP1 of the Brent Development Management Policies 2016
- 9 The proposal fails to demonstrate that an appropriate level of secure, weatherproof cycle parking can be provided for the proposed development or that an appropriately sized refuse store can be situated within a suitable location that facilitates collection and as such, the proposal fails is likely to lead to conditions prejudicial to highway flow and safety, contrary to Policy 6.9 of the London Plan 2016 and DMP1 of the Brent Development Management Policies 2016.

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.

Any person wishing to inspect the above papers should contact June Taylor, Planning and Regeneration,
Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ, Tel. No. 020 8937 2233