# **COMMITTEE REPORT**

Planning Committee on 6 June, 2018 Item No 04

Case Number 17/5416

# **SITE INFORMATION**

RECEIVED	20 December, 2017				
WARD	Barnhill				
PLANNING AREA	Brent Connects Kingsbury & Kenton				
LOCATION	Kings Drive Garages, Kings Drive, Wembley				
PROPOSAL	Demolition of garages and erection of 4 bungalows with associated car parking spaces, cycle storage, refuse storage and amenity space, 25 communal parking spaces and associated landscaping (Amended description 16.12.18).				
PLAN NO'S	See condition 2.				
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 137814  When viewing this as an Hard Copy  Please use the following steps  1. Please go to pa.brent.gov.uk 2. Select Planning and conduct a search tying "17/5416" (i.e. Case Reference) into the search Box 3. Click on "View Documents" tab				

# RECOMMENDATIONS

**RECOMMENDATION** Resolve to grant planning permission subject to conditions.

That the Head of Planning is delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

#### Conditions

- 1. Time Limit for commencement
- 2. Approved drawings/documents
- 3. Construction Method Statement
- 4. Construction Ecological Management Plan
- 5. Site Investigation
- 6. Materials samples
- 7. Further tree survey, arboricultural impact assessment and tree protection scheme
- 8. Details of external lighting and drainage
- 9. Contaminated land remediation measures and verification report
- 10. Hard and soft landscaping scheme
- 11. Provision of parking, amenity space, boundary treatments prior to occupation
- 12. Securing affordable housing

#### Informatives

- 1. CIL Liable
- 2. Crossover works
- 3. Building near boundary
- 4. Party Wall
- 5. Soil quality
- 6. Asbestos removal
- 7. Living Wage
- 8. Notify highways before works commence

That the Head of Planning is delegated authority to make changes to the wording of the committee's decision (such as to delete, vary or add conditions, informatives, planning obligations or reasons for the decision) prior to the decision being actioned, provided that the Head of Planning is satisfied that any such changes could not reasonably be regarded as deviating from the overall principle of the decision reached by the committee nor that such change(s) could reasonably have led to a different decision having been reached by the committee.

That the Committee confirms that adequate provision has been made, by the imposition of conditions, for the preservation or planting of trees as required by Section 197 of the Town and Country Planning Act 1990.

# **SITE MAP**



# Planning Committee Map

Site address: Kings Drive Garages, Kings Drive, Wembley

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# **PROPOSAL IN DETAIL**

The proposal seeks to demolish the garages and to redevelop the parking area to provide four x 2bed bungalows with associated garden space and each having one dedicated parking space, and an additional 25 parking spaces for communal use by existing residents of the housing estate.

### **EXISTING**

The existing site consists of an L-shaped area of hardstanding containing a row of single-storey domestic garages with additional space marked out for parking. There are also some boundary trees and small areas of grass verge.

The site is on the southern and southwestern boundary of the Kings Drive housing estate owned by Brent Council and sits on the brow of a hill with the three and four-storey apartment blocks of the estate stepping down the hill to the north and east. The site does not contain any listed buildings and is not in a conservation area, but is on the boundary with Barn Hill Conservation Area to the west, along the rear garden boundaries of the houses along Barn Hill itself. The surrounding area is residential and of a mixed character, including two-storey detached and semi-detached properties interspersed with larger housing blocks.

The site provides garaging and informal parking for residents of the housing estate, and the garages are let out on short term leases.

#### AMENDMENTS SINCE SUBMISSION

Minor revisions to the site layout have been made in revised drawings submitted on 9 March 2018. These include the addition of patios to each of the gardens and the provision of an enlarged cycle store and garden store in each garden, the addition of rooflights to the dwellings, renumbering of parking spaces to provide four spaces specifically allocated to the new dwellings, and the resizing of one parking space to provide for disabled use. These revisions are not considered to materially impact upon the proposal, and have not been subject to a further period of consultation.

# **SUMMARY OF KEY ISSUES**

The key planning issues for Members to consider are set out below. 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:

**Objections from neighbours:** The application has been referred to Planning Committee due to the number of neighbour objections received. The objections relate mainly to the principle of developing sites such as this, the impact on neighbouring properties in terms of privacy and outlook, the impact on trees including those in neighbouring gardens within the conservation area, loss of parking spaces and the impact on on-street parking capacity. A number of objections relate to the Council's role as landlord and other issues that are not material planning considerations. Objections have been summarised together with a brief officer response in the 'Consultations' section of this report and considered in the relevant sections of the report.

**Principle of development:** The site is previously developed land in an established residential area, and its redevelopment for residential use is supported by current and emerging policy and is considered to be acceptable in principle.

**Affordable housing:** Affordable housing is not a policy requirement for sites of this size. However, the proposal will provide four new affordable homes, as part of a wider programme to redevelop underused garage sites. Your officers attach significant weight to the provision of affordable housing in this case.

**Design, scale and appearance:** The scale of development would be appropriate for its context, whilst the contemporary design would add interest and variety to the street scene without being unduly obtrusive and the layout would make good use of the L-shaped site. The proposal is considered to be of an acceptable standard of design.

**Impact on conservation area:** The site adjoins rear gardens in Barn Hill conservation area. However, the impact on the conservation area is considered to be negligible in this case.

**Relationship with neighbouring properties:** The proposal would not have any material impact on neighbouring properties in terms of their light, outlook or privacy, and would provide adequate light, outlook and privacy for future occupants.

**Residential living standards:** The properties would comply with all relevant standards and would provide a good standard of accommodation.

**Impact on trees and biodiversity:** No significant impact on biodiversity is anticipated. A number of low quality trees are proposed to be removed, and could be compensated for by replacement planting. A further tree survey would be required following demolition of the garages, and a tree protection scheme.

**Transportation:** The proposal would provide parking spaces reflecting the surveyed demand for the existing garages and informal parking, and four parking spaces to serve the proposed dwellings. The access would be constructed as a shared surface, which is appropriate for a development of this size, and would provide sufficient width for cars and pedestrians to pass safely.

# **RELEVANT SITE HISTORY**

There is no relevant planning history.

# **CONSULTATIONS**

67 adjoining properties were consulted by letter on 11 January 2018 for a period of 21 days. This complies with statutory requirements and no press notice or site notice are required in the case of minor developments outside of conservation areas. However, due to public interest in the case a site notice was posted on 14 February 2018 to provide additional publicity.

13 objections were received, in addition to a petition with 105 signatures. A summary of matters raised, together with officers' responses, is given below:

Comment	Response		
Proposal makes only minimal contribution to	These are not valid reasons for refusing		
housing targets	planning permission. Furthermore, Policy H2 of the Draft New London Plan emphasises that		
Proposal would have a negligible impact in terms of regeneration	small sites should play a much greater role in housing delivery, and expects boroughs to apply a presumption in favour of infill developments on		
There are other suitable sites for building bungalows	vacant or underused sites.		
Proposal represents beginning of erosion of open spaces such as Fryent Country Park	The site is a small area of previously developed land and its redevelopment would not in any way create a precedent for development on designated open spaces in the borough.		
Proposal is not in keeping with this area of Barn Hill and the conservation area is not mentioned in any documents.	The site is outside the conservation area. However, the Planning Statement has been revised to include an assessment of the impact on the conservation area, and the conservation officer is satisfied that the impact would be negligible.		
Bungalows look like holiday cottages, similar to prefabs built previously nearby, and do not give the impression of being here for a long time.	The flat-roofed single storey design is intended to minimise the bulk of the properties to be similar to that of the existing garages, but this does not indicate that construction methods and materials would be of low quality.		

Noise pollution from additional residents	Residential uses are proposed within a residential area. The proposal does not introduces uses that are incompatible with this residential setting.			
Loss of trees will result in loss of privacy and amenity for neighbours	Only low quality trees between the garages and rear boundary would be removed, and replacement planting would compensate for these, whilst trees in neighbouring rear gardens would remain.			
Loss of privacy, light and 'green outlook' for existing residents	The development complies with SPG17 and draft SPD1 on overlooking distances and would not result in any loss of light or outlook to neighbouring properties. The site does not provide a 'green outlook' at present other than by virtue of tree cover, and replacement trees are proposed to compensate for trees removed.			
Bungalows will overlook blocks 400-442 and will be subject to 'right to buy' in five years, when the council could not stop purchasers from changing the front aspect or fencing.	The proposal complies with SGP17 and draft SPD1 on overlooking distances. Permitted development rights would be withdrawn if planning permission is granted, and this would still apply even if the properties were sold to private owners.			
Garages have weathered into the landscape and are not used on numerous occasions, whereas the bungalows will be more intensively used.	This is not a valid reason to constrain the development of the site. The level of noise and disturbance from four residential properties is unlikely to be significantly greater than that from the existing use.			
Object to removal of trees	Only low quality trees between the garages and rear boundary would be removed, and replacement planting would compensate for these, whilst trees in neighbouring rear gardens would remain.			
Mature trees on Barn Hill boundary pose risk from storm damage if falling onto proposed dwellings	Despite the increasing frequency and intensity of storm events, the number of tree related deaths recorded per year remains constant at approximately 6.5 throughout the UK, which equates to a less than 1:10,000,000 chance of being killed by a falling tree.			
Information on number of trees fallen in storms in last five years requested	The Council does not keep records of fallen trees. Owners of trees not protected by conservation area status or TPOs are not required to notify the council when trees are removed and the council does not have the resources to check the health of every tree in the borough following a storm.			
Inaccuracies in tree report, which does not show trees on boundary in gardens of Barn Hill residents	The tree report is designed to highlight the quality of trees in and around the site prior to making development decisions. The report also advises on how development should commence in relation to trees and highlights trees of a lesser quality or with irremediable defects that may be removed and replaced as part of the development. The remit does not require the arboriculturalist to enter private gardens but allows them to assess trees from a distance with			

	a caveat that they were unable to inspect the tree in close detail.		
Loss of trees immediately adjacent to conservation area	Trees within the conservation area boundary would remain and would continue to enhance the character and appearance of the conservation area. Trees outside of the conservation area are not protected unless by a TPO, and the trees to be removed are all of low quality.		
Trees will be overbearing on proposed development, and lack of street lighting will also make development dark, unwelcoming and unsafe	The outlook of future residents of the bungalows would not be affected by trees in rear gardens. Trees overhanging the application site could under common law be cut back to the boundary. A lighting plan would be required by condition.		
Proximity to trees will cause risk of fire transmission from one building to another	Trees occasionally catch fire in the UK but do not spontaneously combust unless struck by lightning. Fires that do occur are generally man made, either purposely set fire to or near an object that is already on fire, and in the summer months when foliage is dry.		
Impact of loss of trees on habitat	A Preliminary Ecological Appraisal has been submitted and makes a number of recommendations, which would be required as conditions or noted as informatives as appropriate.		
The development will increase traffic flow in the area, and residents may have more than one car.	The proposal complies with the Council's maximum parking standards and the scale of development is not considered to result in a significant increase in traffic flow.		
Additional traffic will have detrimental impact on owners of houses 33-41 directly opposite	The access is already used for parking and it is not considered that the additional activity caused by an additional four cars would be unduly detrimental.		
Parking in area is inadequate and heavy on-street parking demand on narrow streets causes problems for emergency access	The proposal would not add to on-street parking demand, as the existing level of parking demand on-site and the maximum parking for the new dwellings would be provided.		
Inaccuracy and bias of parking surveys and photographs – parking demand is highest in the evening	Parking surveys are generally conducted overnight as this is the time when parking demand is generally highest. The survey demonstrates that nearby streets are too heavily parked to safely accommodate any overspill parking from this site, and the proposal has been assessed on this basis.		
On-street parking capacity has been reduced eg by introduction of double yellow lines.	The proposal would not add to on-street parking demand.		
Lack of parking nearby for disabled, elderly, less mobile residents and those with young children and/or heavy shopping	There is one on-street disabled parking bay within 200m of the site and the proposal would provide a second. There are no specific parking standards for other groups.		
No arrangements for disabled persons or	The shared surface would be designed for both		
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pedestrians.	pedestrian and vehicular use. Disabled parking would be provided on-site.				
Inaccessibility of public transport in the area.	Parking provision is in line with the council's maximum standards, based on public transport accessibility levels.				
Top of steep hill is not a suitable location for disabled people.	There is no evidence that the bungalows would be occupied by disabled people or that this location would be unsuitable for them.				
New parking spaces could be used by residents of other developments, as at present.	This is an existing situation and not a planning consideration in relation to this case.				
Space should be used to address needs of current residents rather than building new properties.	The meaning of this comment is unclear although it is assumed to refer to the loss of garaging and parking provision. See comments above.				
The opening of the Lycee has increased parking demand on Kings Drive.	Parking demand from the Lycee is unlikely to affect residents of the estate as there are other roads in closer proximity to it with more on-street parking capacity.				
Proposal does not make allowance for access by emergency services or refuse collection vehicles.	The Proposed Site Plan shows a tracking path for a large service vehicle, which would allow both emergency services and refuse collection vehicles to enter and turn within the site.				
Bin storage will be consolidated in one space in the future, causing a nuisance to neighbouring residents.	There are no plans to consolidate bin storage into a single location.				
Nuisance from noise, dust and vibrations during construction	These matters would be controlled through a construction method statement.				
Works will add to poorly maintained standard of Kings Drive road surface, and resurfacing this should be a priority for the council	There is no evidence that the works would cause damage to the road surface. Highway maintenance is a statutory duty of the council and legally separate from its role as a housing provider.				
Council is building bungalows to make a profit	This is not a planning consideration. The council would not make a profit from this development. The four bungalows would be for affordable rent and this would be secured by a planning condition.				
Eviction from garages in 2017 has led to use of the site for dumping of vehicles and rubbish including car tyres, causing environmental nuisance and fire hazard	This is not a planning consideration. Fly-tipping, abandoned vehicles and other environmental nuisance issues should be reported to the council's environmental health team.				
No allowance to indemnify Barn Hill homeowners for loss of life, property and trees due to future fires or storm damage.	This is not a planning consideration. There is no evidence that loss of life, property or trees would occur as a result of this development.				
Notices to quit issued before any consultation with residents – people were subsequently told these were issued incorrectly and it was an attempt to discover who had a garage and how the garages were being used.	This is not a planning consideration.				
Garages are not under-used but are not made	This is not a planning consideration.				

available for rent to residents and have been deliberately left to decay	
The Council and BHP have not sought to enforce any of their rights over the garages since the rebuilding in 2004	This is not a planning consideration.
No consultation letter received	Immediately adjoining neighbours were consulted by letter, as required by legislation. However anyone can comment on a planning application, regardless of whether they received an individual letter.
No reference made to material objections raised in pre-application consultations	There is no statutory requirement for the applicant to submit these.
Previous objections have not been considered and have to be repeated – this is a disrespectful attitude	There have been no previous planning applications on this site. Objections raised during pre-application consultation related mainly to the level of communal parking proposed, and this has been increased following the consultation.
Proposal discriminates against existing residents as bungalows would have private gardens and dedicated parking.	The planning system delivers a range of housing types to meet different needs and circumstances. New developments are expected to comply with the Council's current planning policies. If the new dwellings did not have dedicated parking, they could add to on-street parking demand within the wider area.
Loss of garages has safety and insurance impacts for residents who would be required to park on the street	This is not a planning consideration.
Residents have emotional attachments to having a garage nearby	This is not a planning consideration
Most planning applications have been approved to date. This is just another KPI and quick win for the council	The council as a planning authority is legally required to determine planning applications in accordance with adopted development plan policy. This role is legally separate from the council's role as a landowner and housing provider.
Proposal fails on Brent's planning rules on grass verges, by widening existing 3m grass verges	It is not clear what 'planning rules' this refers to. The Highways Department applies its own guidance to applications under the Highways Acts for new or widened crossovers, and this is not a planning consideration.

# Internal and statutory consultees:

# **Barn Hill Residents Association: No comment**

# **Transport: No objection**

Subject to condition requiring prior submission and approval of further details of lighting and drainage for the resurfaced and widened access road, and informative adivising applicant to contact Head of Highways & Infrastructure to arrange for the crossover to the site to be widened. Comments discussed in main body of report.

# Tree officer: No objection

Subject to condition requiring submission and approval of follow up survey of rear boundary trees following careful removal of garages.

# **Environmental health: No objection**

Subject to conditions requiring (i) site investigation (ii) remediation of any land contamination and verification (iii) construction method statement. Comments discussed in main body of report.

Conservation officer: No objection

# **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 Brent's Core Strategy 2010, Brent's Development Management Policies 2016 and the London Plan 2016. The relevant policies include:

# Brent's Core Strategy 2010

CP2: Population and Housing Growth

CP17: Protecting and Enhancing the Suburban Character of Brent

# Brent's Development Management Policies 2016

DMP1: Development Management General Policy

DMP7: Brent's Heritage Assets

DMP12: Parking

DMP18: Dwelling Size and Residential Outbuildings

DMP19: Residential Amenity Space Appendix 1 - Parking Standards

### The London Plan 2016

Key Policies include:

Policy 3.3: Increasing Housing Supply Policy 3.4: Optimising Housing Potential

Policy 6.9: Cycling

The following are also relevant material considerations:

- The National Planning Policy Framework 2012
- Technical Housing Standards Nationally Described Space Standard 2015
- SPG 17 Design Guide for New Development 2002
- Brent Waste Planning Guide 2013
- Mayor of London's Housing SPG 2016

All of these documents are adopted and therefore carry significant weight in the assessment of any planning application. In addition, the Draft Brent Design Guide SPD1 has been subject to public consultation and once adopted will supersede SPG17, whilst the Draft New London Plan has recently been subject to public consultation and once adopted will supersede the 2016 London Plan. These emerging documents are given more limited weight in the assessment of planning applications at this time.

# **DETAILED CONSIDERATIONS**

# **Principle of development**

- 1. The National Planning Policy Framework 2012 expects local planning authorities to approve proposals that accord with the development plan without delay, encourage the effective use of land by reusing previously developed land, and consider housing applications in the context of the presumption in favour of sustainable development in order to significantly boost the supply of housing.
- 2. Brent's Core Strategy Policy CP2 sets out a target for delivering 22,000 new homes over the 2007-2026 period, and the above policies set a positive context encouraging new housing development on previously developed land in established residential areas such as this site. The draft New London Plan also sets out significantly higher targets for new housing and is a material consideration in the determination of this application. Policy H2 emphasises that small sites should play a much greater role in housing delivery and expects boroughs to support well-designed new homes on small sites. The

proposal would result in the provision of a residential use within a residential area and the provision of additional homes to meet housing need. While only a small number of homes would be delivered, those homes would be on a small site. The general principle of the proposed development accords with relevant policies and is acceptable in principle, subject to other relevant planning considerations.

### Affordable housing

- 3. Core Strategy Policy CP2 sets out aims for new residential developments to achieve the London Plan target of 50% affordable housing and to provide at least 25% family sized accommodation (3bed or larger units). Brent's approach to securing affordable housing provision is set out in more detail in Policy DMP15, which requires an economic viability assessment to support proposals for less than 50% affordable housing and sets out a preferred tenure mix within the affordable housing provision of 70% social or affordable rent and 30% intermediate housing.
- 4. These policies do not apply to sites delivering less than ten housing units, and no affordable housing provision is required on this site. However, the applicant, Brent Council, proposes to offer all four bungalows for Affordable Rent, as set out in the Affordable Housing Statement submitted as part of the application. As such this proposal is part of a wider programme to redevelop under-utilised and vacant garage sites across the borough to provide affordable housing as part of its Housing Strategy, comprising a total of 18 sites delivering 74 new homes, of which planning permission has been granted for 13 sites to date.
- 5. The provision of affordable housing on a small site, where this is not a policy requirement, is considered to be a significant benefit of the scheme. Affordable housing would be secured in perpetuity as a condition.

# Design, scale and appearance

6. Policy CP17 aims to protect suburban areas from inappropriate development including infilling of plots with out-of-scale buildings that do not respect the settings of the existing dwellings, while Policy DMP1 requires the scale, type and design of development to complement the locality. The NPPF also emphasises that good design involves responding to local character and history and reflecting the identity of local surroundings and materials, while not discouraging appropriate innovation.

# Site layout

- 7. The four bungalows would be arranged along the southern and eastern boundaries of the site, each with areas of private garden to the side. This layout would be similar to that of the existing garages, although the garden areas would create a more open aspect than the continuous line of garages. Defensible planting strips would provide a landscaped setting for the dwellings, and the entrance doors would feature canopies to provide a sense of arrival. Parking spaces would be mainly along the northern and western boundaries and the centre of the site would form an estate road providing access to both the bungalows and the parking spaces.
- 8. One small area of soft landscaping is proposed, in addition to defensible planting at the front of the dwellings, hedging along the western and northern boundaries and the private gardens. The site is currently hard surfaced and additional areas of landscaping are not considered to be necessary given that the site is adjacent to the extensive grounds of the Kings Drive estate. However, submission of a landscaping scheme to include further details of both hard and soft landscaping is recommended as a condition.
- 9. The proposal makes effective use of the L-shaped site and would provide a legible and attractive layout for all users.

# Height, bulk, scale and mass

- **10.** The dwellings would be of a rectangular form with flat roofs, and would be broadly similar in terms of bulk and scale to the existing garages. The existing garages have a maximum height of 2.8m whilst the maximum height of the proposed dwellings (including roof parapets) would be 3.3m.
- 11. The flat-roofed single storey design is intended to minimise the bulk of the properties to be similar to that of the existing garages. In terms of architectural style the surrounding area is characterised by traditional housing types which are also greater in bulk and height, and the more contemporary style of the proposal

would represent a departure from the character of the area in this sense. However, the planning system recognises that the character of an area can evolve over time, and that new developments on small infill sites can add variety and visual interest to an established street scene. Given the modest scale of the proposal, the opportunity it provides to improve the current appearance of the site whilst being of a similar scale to the existing buildings, and the layout of the site being largely set back from the road, the development would not look incongruous or out of keeping with the area.

12. The dwellings would be set close to the rear boundaries of adjoining properties, however the site is at a lower ground level (approximately 1m - 2m) than those properties and the rear boundaries are well screened by existing tree cover in the rear gardens. These factors are considered to mitigate the visual impact of the additional height and it is considered that the dwellings would not look obtrusive from neighbouring properties or within the wider street scene. However, existing and proposed ground levels should be confirmed following the demolition of the garages, and a condition is required to secure this.

#### Detailing and materials

- 13. The proposal adopts a simple contemporary design and materials palette, based on smooth grey brickwork and brown aluminium window and door fittings. Architectural detailing would be limited, and this is considered to be appropriate given the modest size of the dwellings. Sections of brickwork banding, bronze cladding panels and door canopies would add visual interest and articulation to the elevations without appearing unduly obtrusive. The natural materials would provide a high quality appearance that would improve with age.
- 14. Details of materials are shown on the plans, however to ensure a high quality development a condition is recommended to require materials samples prior to development commencing. Subject to this condition the design is considered to be acceptable in this case.

#### Impact on conservation area

- **15.** Policy DMP7 sets out criteria for proposals affecting heritage assets such as conservation areas, and the NPPF emphasises that the level of detail provided in heritage statements should be no more than is sufficient to understand the potential impact of the proposal on the significant of the asset affected.
- **16.** The site boundary is adjacent to the boundary of Barn Hill conservation area. However, the setting of a conservation area is not regarded as a heritage asset in itself.
- 17. A heritage statement was provided as part of the revised Planning Statement. The conservation officer is satisfied that this is sufficient to comply with the policy requirements and considers that, due to the modest height of the proposed dwellings in relation to the rear garden fences, the proposal will have little or no impact on the setting of the conservation area. Marginal views from upper windows within the conservation area would overlook the flat roofs of the dwellings, which would be similar to if not an improvement on their existing views.

### Relationship with neighbouring properties

**18.** Any development will need to maintain adequate levels of privacy and amenity for existing residential properties, in line with the 30 degree and 45 degree guidance set out in SPG17 and draft SPD1, retaining a 10m distance to the rear boundary and 20m to the nearest rear-facing habitable room windows. Draft SPD1 also proposes reduced separation distances of 9m and 18m for new developments where this can be justified in terms of the impact on neighbours' privacy. Flank elevation windows should be at a distance of 5m or more from the boundary, or 10m if the only window serving a habitable room.

# Light and outlook

19. Section drawings have been provided to show that the proposed dwellings would be well within a 30 degree line from the nearest rear habitable room windows of properties on Barn Hill and from the nearest windows of the apartment block Nos 412-426 Kings Drive, and that they would also be within a 45 degree line from the rear garden boundaries of properties on Barn Hill (the 45 degree standard is not applied in relation to communal gardens). Notwithstanding objections on this issue, the height and layout of the proposed dwellings would be similar to that of the existing garages, whilst the proposal would comply with the Council's standards and would not result in any loss of light or outlook to neighbouring properties.

## Privacy and overlooking

- 20. Although the distance to the rear garden boundaries on Barn Hill does not meet the 10m distance referred to in guidance, there would be no windows on the elevations facing onto those rear gardens, and the ground levels in the rear gardens of the dwellings would be approximately 1.5m below those of the properties on Barn Hill. Consequently the proposal would not lead to any overlooking and loss of privacy to residents of those properties, subject to a condition requiring details of a suitable boundary treatment.
- 21. The separation distance to the apartment blocks on Kings Drive would be over 20m at most points, reducing to 17m for the northernmost dwelling. However the relationship between the dwellings and the existing blocks would be oblique so that there would be no direct views between the two, and the proposed boundary hedging along the boundary with the Kings Drive estate would prevent any perception of overlooking or loss of privacy to existing residents.
- 22. The main area of garden and the second aspect for each dwelling would be to the side, and side-to-side separation distances between two pairs of dwellings (A1 and A2, and A2 and A3) are below 10m. However, the second dwelling in each case has no window on the flank elevation facing towards the first dwelling, and so it is considered acceptable for them to be in close proximity. Dwelling B has a flank elevation window looking onto the window and garden space of dwelling A3. However, the distance between A3 and B is over 18m, with part of this distance given over to parking spaces which provide some separation from the window to the boundary, and this is considered an adequate distance to maintain the privacy of both occupants in the light of the revised standards in draft SPD1, subject to the provision of boundary fencing as indicated on the plans.
- 23. Notwithstanding the close proximity between the dwellings, they would sit within a 30degree line from one another's windows due to their modest height. Three of the dwellings would be built up to the side garden boundary of adjoining dwellings, contrary to the 45degree standard. However, this is a normal situation for side garden boundaries to single-storey buildings and is considered acceptable.

#### Conclusion

24. Overall, the relationship between the proposed dwellings and neighbouring properties is considered to be acceptable, as is the relationship between each dwelling.

#### Residential living standards

- 25. Development would be required to comply with standards set out in the Mayor's Housing SPG (including minimum internal space standards based on Technical Housing Standards Nationally Described Space Standard 2015), and with Brent Policy DMP19, which requires private amenity space of 20sqm per 1bed or 2bed unit.
- **26.** The proposed dwellings would be 2bed 3person and would have internal floorspace of 64sqm, including adequate storage space. This exceeds the minimum requirement of 61sqm for dwellings of this type. Each dwelling would be dual aspect or triple aspect, with direct access from the living space into the private garden and additional light to bedrooms provided by rooflights.
- 27. Each dwelling would have in excess of 50sqm of private amenity space, which is well in excess of the Council's requirements.

# Impact on trees and biodiversity

28. Potential impacts on trees and biodiversity are material considerations in relation to any planning application, and trees within a conservation area are protected from development by virtue of the conservation area designation.

# **Biodiversity**

29. The existing site is primarily hard surfaced and the biodiversity value is therefore likely to be minimal and confined to the habitat provided by trees and vegetation on and near the site. However, the applicant has submitted a preliminary ecological assessment, based on an ecological desk study and walkover survey. This makes a number of recommendations including a construction ecological management plan, biodiversity enhancement measures incorporated into the landscaping scheme, preliminary bat roost assessments of buildings, mammal ramps fitted to any excavations left overnight, vegetation and building

clearance to be undertaken outside of the bird nesting season, and careful removal of butterfly-bush, which is an invasive species. These requirements will be secured by condition.

# Impact on trees

- 30. A tree survey and arboricultural impact assessment were submitted, which recommends the removal of six low amenity trees to be replaced by a hedgerow and two low amenity groups of trees to facilitate the development, in addition to two trees requiring removal on grounds of arboricultural best practice due to their poor condition.
- 31. The Council tree officer has been consulted and has responded in detail following objections received relating to the loss of trees, potential damage to residents and their property from retained trees, and apparent inaccuracies in the tree survey. In particular, some trees are shown outside of the application site but identified for removal. The tree officer has advised that one of these trees has significant decay and would need to be removed irrespective of the outcome of this application. These project over garages at present and would be over a parking area if the scheme is approved. The applicant has clarified that the other two trees are situated on land within their ownship.
- 32. The tree officer considers that the tree report has been compiled in accordance with industry guidance (British Standard 5837:2012, Trees in relation to design, demolition and construction Recommendations). Tree reports are designed to highlight the quality of trees both in and around sites to aid decisions about developing the site. They are also intended to advise on how development should commence in relation to trees and to identify any trees of a lesser quality or with irremediable defects that could be removed and replaced as part of the development. The remit does not require the arboriculturalist undertaking the report to enter into private gardens but instead allows them to assess such trees from a distance with a caveat that they were unable to inspect the tree in close detail.
- 33. In this case, the report suggests removing a number of low quality trees between the garages and the retaining walls on the rear boundary. These trees have grown up as self-sown seedlings that would have very little structural support once the garages are removed, and the tree officer agrees that they could be removed. Some low grade Ash trees located between the garages and the Kings Drive apartment blocks are also recommended to be removed in order to implement the proposed scheme, and two low amenity groups of shrubs. The tree officer considers that good quality replacement trees could compensate for the loss of any low quality trees that are removed as a result of development, and these can be required by condition.
- **34.** A high quality mature category A Oak tree located in the adjacent rear garden of a property on Barn Hill, and a high quality Oak tree within the Council's site would need to be covered by a tree protection scheme to ensure they are adequately protected from both root and above ground damage throughout all phases of the planned construction.
- **35.** Concerns have been raised regarding the possible loss of structural integrity of trees on or near the rear boundaries of properties in Barn Hill, particularly following the proposed removal of the garages. This group of conifers makes an important contribution in terms of visual amenity, wildlife habitat and screening between Barn Hill and Kings Drive, and any impact on the quality, longevity or structural integrity of this tree group should be prevented. The tree officer has requested a detailed survey of boundary trees and possible root damage following the demolition of the garages and prior to construction starting, as the presence of the garages prevent a conclusive survey being undertaken at this stage. This is to be secured through condition.

### Potential damage from retained trees

- **36.** Further objections have been made regarding potential damage caused by retained trees falling or being damaged during storms, or spreading fire. However, the tree officer notes that whilst storm events have become more frequent and of a higher intensity in recent years, leading to a greater number of tree failures, the number of tree related deaths recorded per year remains constant at approximately 6.5 throughout the UK, a less than 1:10,000,000 chance of being killed by a falling tree. The Council does not keep records of trees on private land that have fallen or been damaged during storms although the number of street trees lost is very small (for example 12 out of a total of 18,000 trees during the recent Storm Eleanor).
- 37. Trees occasionally catch fire in the UK although they do not spontaneously combust unless struck by lightning. If a fire were to occur in one of the dwellings, it could spread to the conifer trees overhanging

the boundary and then to other dwellings. However, a fire could also break out in one of the existing garages or in a parked car, and the overhanging tree branches could be cut back to the boundary under common law.

**38.** Furthermore, the responsibility for trees on private land lies with the owners of those trees and it is not the duty of a third party such as the applicant in this case to indemnify the safety of trees under another person's ownership.

#### Conclusion

**39.** In conclusion, the recommendations of the tree report are considered to be acceptable, subject to a revised report being submitted to clarify the position of boundary trees and conditions requiring a more detailed survey following demolition and a tree protection scheme. The risk of harm to future residents or their properties from retained trees is considered to be negligible.

#### **Environmental health**

#### Contaminated land

40. Environmental Health consider that land contamination may be present due to the use of the site for garaging, and have requested conditions requiring prior submission and approval of a site investigation report, any remediation measures to be carried out and a verification report to be submitted and approved prior to occupation, to ensure that the site can be made safe for the intended residential use. Informatives are also recommended, regarding the quality of imported soil and the applicant's duties under the Control of Asbestos Regulations.

#### Construction noise and dust

**41.** Environmental Health consider that the construction process has the potential to contribute to background air pollution levels and cause nuisance to neighbours, and have requested a condition requiring prior submission and approval of a Construction Method Statement in order to minimise these impacts.

# **Transportation considerations**

# Parking provision

- **42.** Parking standards are given in Policy DMP12 and Appendix 1 of the Development Management Policies, and Policy DMP11 provides criteria for new road accesses. Cycle parking spaces must be provided in compliance with the London Plan (two spaces per 2bed unit) in a secure weatherproof location. Bin storage should allow for collection from the highway within a 20m carrying distance.
- 43. As the site does not have good access to public transport services, the higher residential car parking allowances apply. The four dwellings would therefore be allowed up to one space each, giving an allowance of four car parking spaces in total.
- 44. Policy DMP12 also requires that any overspill parking generated in the area can be safely accommodated on-street and as such, consideration also needs to be given to the impact of the proposals on existing parking provision for the wider estate. The site currently comprises 28 garages and marked space for about 25 additional cars (plus three informal spaces). The applicant has confirmed that only eight of the garages are rented out, of which seven are used for storage. Three further internal estate roads can accommodate up to about 30 cars before turning heads and access routes start to become obstructed.
- 45. To assess existing demand for parking, the applicant commissioned an overnight parking survey over two consecutive midweek nights in March 2017. These identified 23-25 cars parked within the site. Within the wider estate, which is managed by Brent Housing Partnership, 44-48 cars were observed parked overnight, thus giving an overall total of 67-73 cars parked within the estate. The available external parking space within the estate was therefore fully occupied. A total of 114 flats are located within the estate, so the parking surveys suggest that car ownership averages up to 0.64 cars per flat. This accords closely with data collected in the 2011 Census, which identified average car ownership for flats in this area at 0.59 cars per flat. The surveys are therefore considered to be representative.

- 46. The overnight parking surveys also included lengths of public highway close to the site; namely Kings Drive, Swinton Close and Greenhill Way. The first two streets were noted as being very heavily parked, although Greenhill Way, which is about 120m south of the site, was very lightly parked. As such, the streets closest to the site are not considered to be capable of safely accommodating any overspill parking, so it is essential that the development is capable of re-providing existing parking spaces and of accommodating any additional demand from the new dwellings.
- 47. To this end, the access road within the site is proposed to be reconstructed in block paving and marked to provide a total of 29 parking spaces, to accommodate the maximum surveyed total of 25 cars observed parked overnight within the site at present and to provide an additional four spaces for the proposed new dwellings. One parking space would be for disabled use, which would supplement the one existing on-street disabled bay. The boundary with the grounds of the Kings Drive estate would be partly open to provide informal access between the site and the existing apartment buildings, however a hard-surfaced pedestrian link is not proposed as changes in ground levels would make this inaccessible by wheelchair.
- 48. As the new dwellings are considered likely to generate demand for only two or three cars (based on Census data) and with the layout having the potential to accommodate up to five further informal parking spaces close to the turning head, the development is considered capable of reproviding existing useable parking and of accommodating additional parking from the new dwellings within the site, and is therefore considered unlikely to add to on-street parking demand in the wider area.

#### Cycle parking and bin storage

- 49. The London Plan requires each new dwelling to be provided with two secure bicycle parking spaces and a covered locker is proposed in the garden of each property to meet this requirement.
- 50. Bin stores are also proposed alongside each dwelling. The northernmost of the four proposed dwellings would be located some 80m from Kings Drive and to accommodate access by refuse vehicles and emergency services, a new turning head is proposed at the end of the access road, of sufficient size to allow large delivery and refuse vehicles to turn and leave the site in a forward gear. This is welcomed.

#### Pedestrian and vehicle access

- 51. With regard to pedestrian access, the access road is proposed to be resurfaced in block paving to act as a shared surface and to avoid the need for footways. The road layout is unusual, as it is a hybrid between a road and a parking court. As such, the 'carriageway' edges are not as clearly defined as might be the case for other developments. However, the use of a shared surface would be appropriate for the level of housing and parking proposed.
- 52. In general, a typical maximum width for an estate road would be 5.5m, with cars able to park along one side of the street. Widths of 4.1m would still allow two cars to pass one another, but would require service vehicles to wait for a gap in the traffic. This layout provides an overall width of over 6m at all points, so exceeds the usual maximum width for an estate road. The parking bay near to Bungalow B reduces the remaining unobstructed width to 4.2m, which is still sufficient for two cars to pass. As such, there should not be a need for cars to wait to pass one another. Large service vehicles and cars would have to wait on either side of the pinch point to pass one another, but the chances of this occurring are close to zero, as only one (or occasionally two) large vehicles could be expected per week.
- 53. The layout of the parking spaces close to the sharp bend in the road reduces forward visibility when these spaces are occupied, but this is not considered to be a concern as it retains the existing arrangement and the access is to be resurfaced as a low-speed, shared surface environment. Manual for Streets (para. 7.8.2) states that there will be situations where it is desirable to reduce forward visibility to control traffic speed, and this area would be one such example of this.
- 54. The widening of the crossover to Kings Drive would need to be undertaken by the Council's Highways & Infrastructure service at the applicant's expense, and further details of drainage and lighting along the road should be submitted and approved as a condition of any approval. Subject to this condition there are no objections on transportation grounds.

#### **Density**

55. Development of the site would be expected to conform to the density range set out in the London Plan of

150-250 hr/ha for suburban sites (or 50-95 units/ha) with a PTAL score of 2, unless a higher density can be justified as a result of a scheme being acceptable in planning terms. The proposed density of approx. 60 hr/ha or 20 units/ha is below the London Plan density range, however part of the site would be used to reprovide existing parking and consequently the proposed density is considered to be appropriate to its context.

#### Other matters

**56.** A number of objections have been received relating to the management of the site by the Council in its role as a housing provider (the applicant). However, these matters are not material planning considerations. The applicant has confirmed that the six garages currently in use are rented on licence agreements with a 7 day notice period, and that there are no tenancies or lease agreements involved. Consequently there is no requirement in planning legislation for the applicant to serve notice of the planning application on other parties with an ownership interest.

# **CIL DETAILS**

This application is liable to pay £0.00\* 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): 259 sq. m. Total amount of floorspace on completion (G): 259 sq. m.

Use	Floorspace	Eligible*	Net area	Rate R:	Rate R:	Brent	Mayoral
	on	retained	chargeable	Brent	Mayoral	sub-total	sub-total
	completion	floorspace	at rate R	multiplier	multiplier		
	(Gr)	(Kr)	(A)	used	used		
Dwelling	259	0	0	£200.00	£35.15	£0.00	£0.00
houses							

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)	313		
Total chargeable amount	£0.00	£0.00	

<sup>\*</sup>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.

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.

<sup>\*\*</sup>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.

# **DRAFT DECISION NOTICE**



#### **DRAFT NOTICE**

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

# **DECISION NOTICE - APPROVAL**

Application No: 17/5416

I refer to your application dated **20/12/2017** proposing the following:

Demolition of garages and erection of 4 bungalows with associated car parking spaces, cycle storage, refuse storage and amenity space, 25 communal parking spaces and associated landscaping (Amended description 16.12.18).

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

# at Kings Drive Garages, Kings Drive, Wembley

The Council of the London Borough of Brent, the Local Planning Authority, hereby **GRANT** permission for the reasons and subject to the conditions set out on the attached Schedule B.

Date: 25/05/2018 Signature:

**Alice Lester** 

Head of Planning, Transport and Licensing

Mice Lester

#### **Notes**

- 1. Your attention is drawn to Schedule A of this notice which sets out the rights of applicants who are aggrieved by the decisions of the Local Planning Authority.
- 2. This decision does not purport to convey any approval or consent which may be required under the Building Regulations or under any enactment other than the Town and Country Planning Act 1990.

DnStdG

Application No: 17/5416

#### SUMMARY OF REASONS FOR APPROVAL

1 The proposed development is in general accordance with policies contained in the:-

National Planning Policy Framework 2012 London Plan 2016 Brent Core Strategy 2010 Brent Development Management Policies 2016 Supplementary Planning Guide 17: Design Guide for New Development 2001

1 The development to which this permission relates must be begun not later than the expiration of three years beginning on the date of this permission.

Reason: To conform with the requirements of Section 91 of the Town and Country Planning Act 1990.

The development hereby permitted shall be carried out in accordance with the following approved drawing(s) and/or document(s):

PL01 Rev E PL02 Rev E PL03 Rev K PL04 Rev K PL10 Rev K PL11 Rev K PL12 Rev I PL13 Rev I PL14 Rev D PL15 Rev E PL20 Rev K

PL22 Rev F

PL23 Rev F

PL30 Rev E

PL31 Rev F

# Supporting information

Affordable housing statement Arboricultural Impact Assessment Preliminary Ecological Assessment Material Schedule Planning Statement Design and Access Statement Parking Stress Survey Summary

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

The proposed parking spaces, refuse and recycling facilities, cycle storage facilities and amenity spaces inclusive of their boundary treatments shall be installed, completed and made available for use in accordance with the approved details before the development is occupied and thereafter retained and not used other than for purposes ancillary to the dwellings hereby approved and to provide parking to serve the needs of neighbouring residents.

Reason: These details are required to ensure that a satisfactory development is achieved.

The four residential units hereby approved shall be homes within an affordable rent tenure and shall remain within this tenure for the lifetime of the development, unless an alternative arrangement is first agreed in writing with the Local Planning Authority.

Reason: To ensure the development provides affordable housing in accordance with the applicant's affordable housing statement.

Prior to the commencement of the development a Construction Method Statement shall be submitted to and agreed in writing by the Local Planning Authority, outlining measures that will be taken to control dust, noise and other environmental impacts of the development. The measures set out within the approved document shall be complied with during the construction of the development.

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

Prior to development commencing, a Construction Ecological Management Plan shall be submitted to and approved in writing by the Local Planning Authority, setting out how the construction process will be managed so as to protect biodiversity interests across the site, in accordance with the recommendations of the approved Preliminary Ecological Assessment.

Reason: In order to ensure that the development results in no net loss to biodiversity.

Following the demolition of the existing buildings and prior to the commencement of building works, a site investigation shall be carried out by competent persons to determine the nature and extent of any soil contamination present, and shall be submitted to and approved in writing by the local planning authority. The investigation shall be carried out in accordance with the principles of BS 10175:2011 + A1:2013 and 'Model Procedures of for the Management of Land Contamination – Contaminated Lane Report 11' (CLR 11). A report shall be submitted to the Local Planning Authority, that includes the results of any research and analysis undertaken as well as an assessment of the risks posed by any identified contamination. It shall include an appraisal of remediation options should any contamination be found that presents an unacceptable risk to any identified receptors.

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

Details of materials for all external work, including samples which shall be made available for viewing on site or within another location as agreed, shall be submitted to and approved in writing by the Local Planning Authority before any above ground level works are commenced (excluding demolition). The work shall be carried out in accordance with the approved details.

Reason: To ensure a satisfactory development which does not prejudice the amenity of the locality.

9 Following the demolition of the existing buildings and prior to the commencement of building works, a detailed tree survey, arboricultural impact assessment and tree protection scheme carried out in accordance with British Standard 5837:2012 shall be submitted to and approved in writing by the local planning authority.

Reason: To prevent any damage to retained trees including trees within the conservation area boundary.

Prior to development commencing, further details of an external lighting scheme and a drainage scheme for the access road shall be submitted to and approved in writing by the local planning authority. The lighting scheme shall propose measures such as baffled, low level and movement-sensitive lighting to prevent light pollution causing nuisance to neighbouring residents. The approved details shall be implemented in full for the lifetime of the development.

Reason: To enable safe access throughout the site at all times, to ensure adequate drainage for the site and to safeguard the residential amenities of neighbouring residents.

Any soil contamination remediation measures required by the Local Planning Authority shall be carried out in full. Prior to first occupation or use of the site, a verification report shall be submitted to the Local Planning Authority, stating that remediation has been carried out in accordance with the approved remediation scheme and the site is suitable for end use (unless the Planning Authority has previously confirmed that no remediation measures are required).

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

Details of hard and soft landscape works of the areas so identified on the approved plans shall be submitted to and approved in writing by the Local Planning Authority prior to first occupation of the development. The approved details shall be carried out in full prior to occupation of the buildings and thereafter maintained in accordance with the approved scheme.

The scheme shall indicate:-

- details of existing and proposed ground levels throughout the site;
- soft landscaping including plant sizes and species and densities of planting for plants and shrubs:
- tree planting to replace any trees removed;
- biodiversity enhancement measures as recommended in the approved Preliminary Ecological Assessment;
- details of materials to be used for areas of hard surfacing;
- details of boundary treatment including materials;
- landscape management plan showing requirements for the ongoing maintenance of hard and soft landscaping.

Any trees, shrubs and plants planted in accordance with the landscaping scheme which, within 5 years of planting are removed, dying, seriously damaged or become diseased, shall be replaced by trees and shrubs and plants of similar species and size to those originally planted.

Reason: To ensure a satisfactory standard of appearance and to ensure that the proposed development enhances the visual amenity of the area.

# **INFORMATIVES**

- The applicant is advised that this development is liable to pay the Community Infrastructure Levy; a Liability Notice will be sent to all known contacts including the applicant and the agent. Before you commence any works please read the Liability Notice and comply with its contents as otherwise you may be subjected to penalty charges. Further information including eligibility for relief and links to the relevant forms and to the Government's CIL guidance, can be found on the Brent website at www.brent.gov.uk/CIL.
- If the development is carried out it will be necessary for the existing crossing over the public highway to be widened by the Council as Highway Authority. This will be done at the applicant's expense in accordance with Section 184 of the Highways Act 1980. An application for such works should be made to the Head of Highways and Infrastructure. The grant of planning permission, whether by the Local Planning Authority or on appeal, does not indicate that consent will be given under the Highways Act.
- The applicant must ensure, before work commences, that the treatment/finishing of flank walls can be implemented as this may involve the use of adjoining land and should also ensure that all development, including foundations and roof/guttering treatment is carried out entirely within the application property.
- The provisions of The Party Wall etc. Act 1996 may be applicable and relates to work on an existing wall shared with another property; building on the boundary with a neighbouring

property; or excavating near a neighbouring building. An explanatory booklet setting out your obligations can be obtained from the Communities and Local Government website <a href="https://www.communities.gov.uk">www.communities.gov.uk</a>

- The quality of imported soil must be verified by means of in-situ soil sampling and analysis. We do not accept soil quality certificates from the soil supplier as proof of soil quality
- Given the age of the buildings to be demolished it is possible that asbestos may be present. The applicant should be reminded of their duties under the Control of Asbestos Regulations and must ensure that a qualified asbestos contractor is employed to remove all asbestos and asbestos-containing materials and arrange for the appropriate disposal of such materials.
- Prent Council supports the payment of the London Living Wage to all employees within the Borough. The developer, constructor and end occupiers of the building are strongly encouraged to pay the London Living Wage to all employees associated with the construction and end use of development.
- The applicant is advised to notify the Council's Highways and Infrastructure Service of the intention to commence works prior to commencement and include photographs showing the condition of highway along the site boundaries. The Highways and Infrastructure Service will require that any damage to the adopted highway associated with the works is made good at the expense of the developer.

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