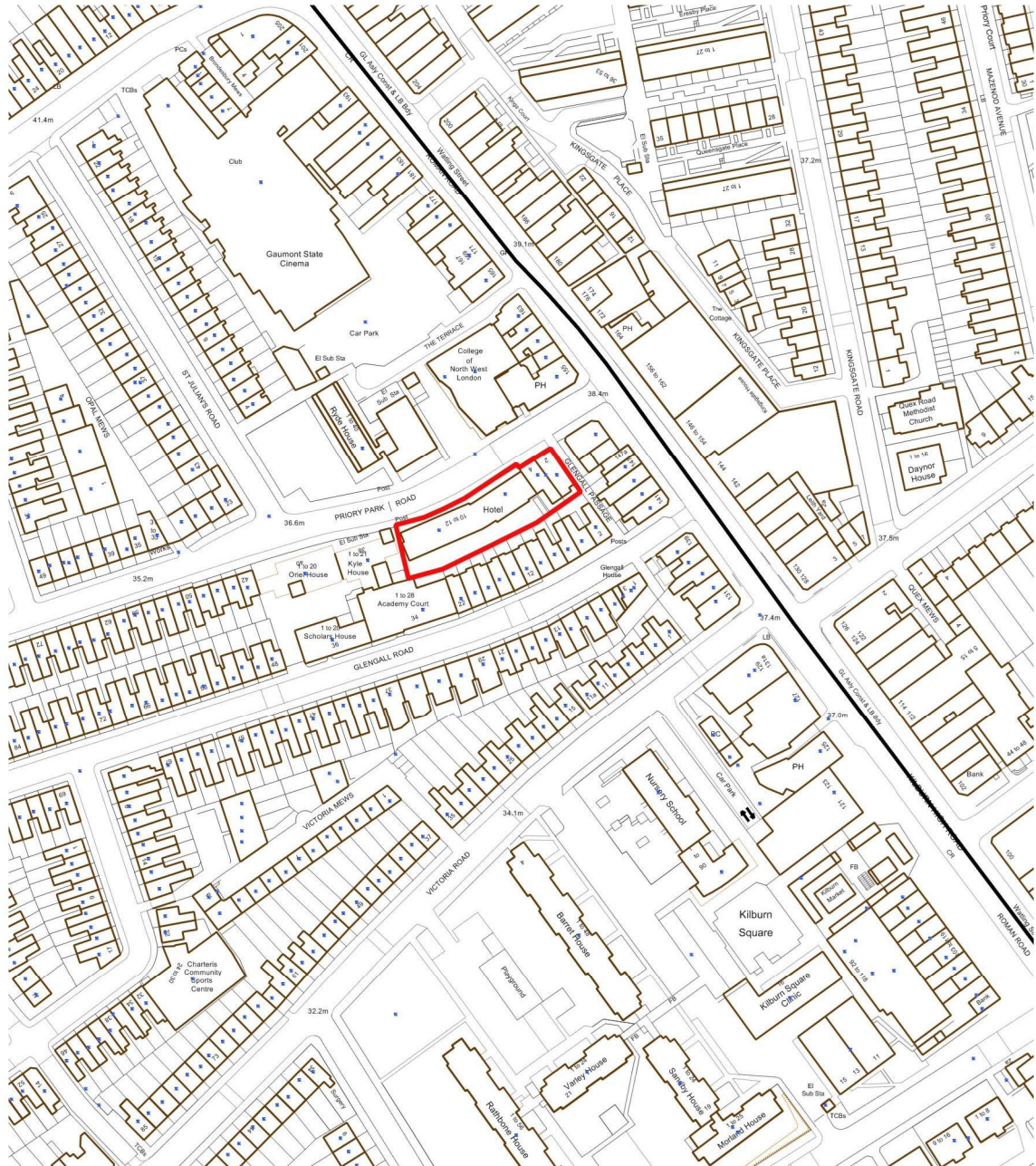




Planning Committee Map

Site address: 2-12 inclusive, Priory Park Road, London, NW6 7UG

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This map is indicative only.

RECEIVED: 29 December, 2011

WARD: Kilburn

PLANNING AREA: Kilburn & Kensal Consultative Forum

LOCATION: 2-12 inclusive, Priory Park Road, London, NW6 7UG

PROPOSAL: Demolition of 2-12 Priory Park Road [inclusive] (currently accommodating a HMO and a 79 room/ 198 person hostel) and erection of a proposed 6 storey building (plus basement), accommodating a 178 room/ 351 person hostel, with associated communal facilities at ground and lower ground level, and landscaping works.

APPLICANT: Topclass Investments Ltd

CONTACT: Nicholas Taylor & Associates

PLAN NO'S:

Planning Statement by Nicholas Taylor & Associates Dated December 2011
02-001; 02-100; 02-101; 02-102; 02-103; 02-104; 02-105; 02-106; 02-107
02-108; 02-109A; 02-110; 02-111A; 02-112; 02-113; 02-114; 02-115; 02-116B
02-117B; 02-119; 02-200; 02-201; 02-202A; 02-203A; 02-204; 02-205; 02-300B
02-301A; 02-302B; 02-303A; 02-303A; 02-400A; 02-401; 02-402; 02-403A; 02-404;
02-405; 02-406; 02-407; 02-408;

Accompanying Documents:

Design and Access Statement
Sustainability Report
Energy Report
Daylight and Sunlight Report
Photomontages 1,2 and 3

RECOMMENDATION

Refusal

EXISTING

The existing site includes 3 four storey Victorian Apartment Blocks located on the south side of Priory Park Road within Kilburn. There is an existing hostel use on the four floors of the two buildings St Lawrence House (6-8 Priory Park Road) and Priory Mansion (10-12 Priory Park Road). The hostel is shown as having 79 rooms providing accommodation for a maximum of 182 people. The groundfloor of the apartment block at Nos. 2 and 4 Priory Park Road contains vacant commercial units which form part of the Kilburn Town Centre secondary shopping frontage. While the upper units which have fallen into disrepair are stated to have been most recently in use as an HMO.

The site has an area of 0.14 hectares and is close to and partially within Kilburn Town Centre and has a ptal rating of 6a as taken from the TFL database in March 2012. As such it is considered to have excellent public transport accessibility and is within 900m of two national rail stations, one underground station and numerous bus routes. To the north the site is bounded by Priory Park Road, to the east Glengall passage (a pedestrian route to the rear of the shops on Kilburn High Road between Priory Park Road and Glengall Road), to the south the rear gardens of the

residential properties on Glengall Road and to the west a new residential development that was part of the former College of North West London Site.

The buildings are not listed nor are they within a Conservation Area.

PROPOSAL

As above.

HISTORY

07/2810 - Demolition of existing building and erection of a 1, 4- and 6-storey building, comprising 37 studio flats, 2 retail units on ground level, cycle parking and roof balcony to fifth floor – Withdrawn

03/2938 - Creation of 11 dwellings involving demolition of existing buildings and erection of 1 five-storey block, comprising 7 two-bedroom flats, 3 one-bedroom flats, 1 three-bedroom flat and 2 retail units – Withdrawn

02/2547 - Alterations and extensions to convert entire building, comprising restaurant and office with flats above, to House in Multiple Occupation, comprising 37 double bedrooms with access through Nos. 10-12 next door, including demolition of existing three-storey rear extension and erection of part single-storey, part four-storey extension to both buildings, construction of new mansard roof, erection of 4-storey external metal staircase to the rear and railings at front - Refused for the following reasons:

- 1. The proposed change of use of the property to a hostel for homeless people would be unacceptable, in that the Council is no longer able to support such proposals for new hostel accommodation, when the preference is for the provision of rented affordable accommodation, to reduce the numbers of homeless and families in any form of temporary bed & breakfast, hostel or hotel accommodation. In addition, the hostel would result in the loss of a site suitable for permanent residential accommodation and is, therefore, contrary to Policy H30 of the Brent Revised Unitary Development Plan.*
- 2. The proposed change of use of the property to a hostel for homeless people would be unacceptable, by reason of the absence of on-site amenity space and the limited facilities within the building for the numbers of residents proposed, as well as the poor standard of environment proposed for certain of the proposed rooms (in particular, the ground-floor rear rooms). The proposal is, therefore, contrary to Policy H30 of the Brent Revised Unitary Development Plan.*
- 3. The proposal would result in the loss of the existing ground-floor commercial units, which are designated as forming a Secondary Shopping Frontage in both the adopted and emerging Unitary Development Plans, and their replacement with a use that does not provide a service to visiting members of the public. As a result, the proposal is contrary to policy S8 of the adopted Brent Unitary Development Plan 1996 and policy SH10 of the Revised Replacement Draft Unitary Development Plan 2001.*
- 4. The proposed mansard roof extension, by reason of its height, bulk, design and appearance, would constitute an unacceptable form of development, detracting from the appearance of the building, in particular, and the locality, in general. The proposal would be visually incongruous, relating poorly to surrounding forms of development, and as a result, would be contrary to policies E1 and H6 of the adopted Brent Unitary Development Plan and policy BE9 of the emerging Brent Unitary Development Plan Replacement Revised Deposit Draft.*
- 5. The proposed four-storey rear extension and rear external staircase would, by reason of their height, bulk, design and appearance, constitute an unacceptable form of development,*

detracting from the appearance of the building in particular, and the locality in general. Furthermore, the proposed alterations to the ground-floor frontage of the building would, by reason of their external appearance, relate poorly to the existing building. The proposal would be visually incongruous, relating poorly to surrounding forms of development, and as a result, would be contrary to policies E1 and H6 of the adopted Brent Unitary Development Plan and policy BE9 of the emerging Brent Unitary Development Plan Replacement Revised Deposit Draft.

6. *The proposed extensions to the building would, by reason of their height, size and siting, constitute an unacceptable form of development, detracting from the amenities of those people living nearby. The proposals would result in overlooking to, and create a sense of overbearing for, these residents and would be contrary to policies E1 and H6 of the adopted Brent Unitary Development Plan and policy BE9 of the emerging Brent Unitary Development Plan Replacement Revised Deposit Draft.*
7. *The applicant has failed to demonstrate that additional car-parking provision can be made within the site to meet the Standards set out in the emerging policies of the Council. As a result, the proposal is likely to add to the already high demand for on-street parking in the area, to the detriment of the free and safe flow of traffic, and would be contrary to policies TRN23 and PS13 of the Brent Unitary Development Plan Replacement Revised Deposit Draft.*

POLICY CONSIDERATIONS

London Plan 2011

3.8 - Housing Choice - Taking account of housing requirements identified at regional, sub-regional and local levels, boroughs should work with the Mayor and local communities to identify the range of needs likely to arise within their areas and ensure that other supported housing needs are identified authoritatively and co-ordinated action is taken to address the in LDF and other relevant plans and strategies.

3.14 - Existing Housing - Loss of housing should be resisted unless the housing is replaced at existing or higher densities with at least equivalent floor space (this policy includes loss of hostels and accommodation that meets an identified need). The loss of housing to short term provision should also be resisted.

Core Strategy 2010

CP6 - Design & Density in Place Shaping

CP14 - Public Transport Improvements (Infrastructure)

CP15 - Infrastructure to Support Development

CP18 - Protection and Enhancement of Open Space, Sports and Biodiversity

CP19 - Brent Strategic Climate Change Mitigation and Adaptation Measures

CP21 - A Balance Housing Stock - the plan seeks to maintain and provide a balanced housing stock in Brent in support of Policy CP2 by protecting existing accommodation that meets known needs and by ensuring that new housing appropriately contributes towards the wide range of borough household needs including:

- Non self-contained accommodation to meet identified needs.

UDP 2004

BE2 - Townscape: Local Context & Character

BE3 - Urban Structure: Space & Movement

BE4 - Access for Disabled People

BE5 - Urban Clarity & Safety

BE6 - Public Realm: Landscape Design

BE7 - Public Realm Streetscape

BE9 - Architectural Quality

EP3 - Local Air Quality Management
EP6 - Contaminated Land
H6 - Protection of Existing Affordable Housing (inc HMOs)
H10 - Containment of Dwellings
H12 - Residential Quality - Layout Considerations
H13 - Residential Density
TRN3 - Environmental Impact of Traffic
TRN4 - Measures to Make Transport Impact Acceptable
TRN 11 - The London Cycle Network
TRN23 - Parking Standards

Non-planning Guidelines

Housing Strategy 2009-2014 - Shaping the Future of Housing in Brent.

SUSTAINABILITY ASSESSMENT

The applicants have submitted an energy report and a sustainability report with the application. The applicants have provided an assessment of the predicted energy performance and carbon dioxide emissions of the proposed development. The development is expected to achieve a reduction in CO2 emissions of 50.2% over Building Regulations Part L (2010). They also state that they will have a BREEAM 'Excellent' rating. However they have filled in an out of date version of the Council's Sustainability Checklist. As such the full impact of the proposed development on sustainable design and construction cannot be fully assessed.

The Council would seek to ensure that the sustainability proposals that form part of this development are controlled and monitored through an appropriate legal agreement. In the absence of such an agreement the Council will not be able to ensure that they are carried out and as such it will need to be included as a reason for refusal.

CONSULTATION

All neighbouring residents were consulted. Site notices were installed outside the site and a press notice was served. Internal consultation was undertaken with letters sent to Highways, Landscape Design, Housing, Policy, Urban Design and Environmental Health.

32 letters of objection and a petition with 1000 signatories were received in relation to the proposed development. The following issues were raised.

- The existing buildings make a valuable contribution towards the character and appearance of the area and should not be demolished.
- An expanded hostel use would have an unwelcome impact on the amenity and the character of the local area.
- The proposal will result in additional strain on existing parking on Priory Park Road and surrounding streets.
- There will be a detrimental impact on the amenity of neighbouring residents on Glengall Road in terms of increased overlooking, loss of daylight and sunlight.
- There is a need for more homes and flats in the area not a hostel.
- The proposed hostel expansion will result in an increase in anti-social behaviours in the local area in particular noise, waste and pests.
- The proposed building is out of keeping with the character of the area and does not relate well to neighbouring buildings.
- The proposal lacks a mix of uses required to create a balanced community.

- Unsustainable to demolish an existing building which could be refurbished
- The increase in the temporary accommodation will result in residents not being committed long term to the area which can result in problems with anti-social behaviour.
- Existing residents have been overlooked and in some cases filmed by residents of the hostel they are concerned that this sort of behaviour may be exacerbated by an intensification of the use.
- There will be an over-concentration of such facilities within this area given a recent approval in Camden on Quex Road.

There has also been 1 letter from a local resident in support, with comments including:

A well designed modern building will be welcomed.

Housing

Confirm that the Council is currently using Priory Mansions and St Lawrence Mansions to accommodate homeless clients, and has been doing so for some time. At the time of writing there are 47 households occupying 55 rooms in these two hotels.

An improvement in the quality of the existing hotel provision on this site would be welcomed. However the scale of the proposal is too large and Brent Council would not use all the proposed rooms. Given the proximity of the hostel to neighbouring boroughs of Westminster and Camden it is likely that any additional rooms would be used by these Authorities.

Urban Design

The design of the scheme has improved throughout a lengthy pre-application process. There are positive attributes of this scheme however there are a number of improvements that could be made. These include improvements to the amenity space, front boundary treatment and the perception of scale to the rear.

The main concern is with the size and quality of the accommodation proposed. Accommodating two persons for any length of time in such a confined space is not viewed as providing decent living space. The proposal is let down by the small unit sizes.

Environmental Health

No objections to the proposed development however additional information is required in relation to the proposed CHP, the measures to mitigate against the impacts of dust and fine particles generated during demolition and construction. Conditions should be attached to ensure that wheel washing and development is controlled on site.

Highways

No Highways and Transport Delivery objections subject to a Section 106 Legal Agreement confirming payment towards improving highway safety, new parking controls and better non-car access. A condition is strongly advised requiring the door shown opening onto Glengall Passage to be altered to open inwards, so as not to obstruct the public highway.

Landscape design

The area of amenity space proposed seems low in relation to the number of people that could be accommodated on the site. Further details of landscaping including the green roof would be required by condition should the application be approved.

Kilburn and Queens Park Safer Neighbourhood Team

Comments submitted stating that the proposed intensification of the hostel in this location could result in additional pressures on the already stretch local emergency services. There are existing problems with anti-social behaviour associated with the bookmakers at the top end of Priory Park Road and around Glengall Passage.

London Borough of Camden

No objections to the proposed development.

REMARKS

Principle

Provision of expanded hostel

The main policy relating to hostels is set out in CP21 of Brent's Core Strategy 2010. This seeks to maintain and provide a balanced dwelling stock to accommodate the wide range of Brent Households by, amongst other criteria, ensuring appropriate dwellings range and mix and providing an appropriate range of non-self-contained accommodation to meet identified needs. In the supporting text for this policy it states that non self-contained accommodation, such as hostels for households without children (including key workers and students).

To date St Lawrence House and Priory House are in use as hostels, the applicants have provided evidence that indicates that the use has existed in both premises since the mid 1990s. They have been used to provide accommodation for homeless households from Brent and other Boroughs. At present rooms are booked out by Brent Council Housing Services on a flexible basis, to provide temporary accommodation for homeless households. The applicants have provided details of all of the current bookings. A break down of the size of each house hold is set out in the table below, this data was provided by the applicants in the form of current bookings from Brent Council:

Family Size	St Lawrence Mansions	Priory Park Mansions
Individuals	2	10
Mother with Child	1	4
One Child	9 (1 of which is a 2-parent family)	15 (2 of which are 2 parent families)
Two Children	7 (2 of which are 2-parent families)	6 (2 of which are 2-parent Families)
Three Children	5 (1 of which is a two-parent family)	1
4+ children	3 (3 of which are two-parent families)	1

As the majority of the existing rooms do not have private bath room facilities the maximum length of stay for any household is only 6 weeks. There are a limited number of en-suite rooms and the household resident in these can stay in the room for an indefinite period. The existing facilities are considered to be of a poor condition and in need of renovation.

There is a discrepancy within the submission documents regarding the number of rooms within the proposed development and the total number of people it can accommodate. The design and access statement states that there are 176 rooms with 351 beds while the planning statement refers to 179 rooms which can accommodate 398 persons. From the plans submitted there are 178 rooms proposed with 351 beds. The proposal will therefore be assessed on the basis of the information contained within the proposed plans.

The accommodation proposed can be broken down into the following room sizes 8 x one-bed rooms (6 of which a disabled accessible), 167 x two beds (of which 12 are disabled accessible) and 3 x three-bed units. Communal facilities proposed include a lounge on the lower ground floor, communal amenity space, laundry room, tv room and gym. Most of the communal facilities are on the lower ground floor. Each room will be en-suite and they will all have a kitchenette with sink facilities.

The information submitted states that there is an outstanding need of about 30 households with each household having an average of 4-5 persons. As such the applicants contend that there is a need for 150 bed spaces and that the proposed development would meet that existing need.

In response to this it should be noted that this is not a consistent level of demand for temporary accommodation as it fluctuates over the short term. However the Council's Housing Department have provided information on current and emerging trends for temporary accommodation. In the year 2010/11 the council accepted a duty to rehouse 367 homeless households following a downward trend with a peak of 1300 acceptances in 2001/02. There has also been a significant decline in the use of hostels/hotels for housing households for housing homeless families over the same period. Although there is uncertainty with regards to future trends due to changes in housing and employment benefit the Housing Service do anticipate that they would use or need the level of accommodation proposed.

The demand for accommodation is highest amongst households with children, as demonstrated with 35% of the households accommodated in the existing hostel having two or more children. The proposed accommodation is predominantly 2-bedroom rooms with a kitchenette and bathroom. This would result in children being accommodated in separate rooms from parents should the proposed accommodation be used for the housing of families with two children or more.

Therefore it is considered that there is not sufficient local demand for the number of rooms or the type of accommodation proposed (mainly two-bed units). The Council's Housing Department have confirmed that they while they would use some of the rooms proposed they would not use all of the accommodation and would not enter into a block booking arrangement for any rooms due to their view on medium term demand and as a result of previous block bookings resulting in payments being made for empty rooms.

The applicants state that there is a need for temporary accommodation such as hostels as set out in the Core Strategy Policy CP 21 and that the proposed scheme as well as meeting need for homeless accommodation will also provide accommodation for students and temporary workers. In the Core Strategy it sets out that over the period from 2007-2017 the Borough aims to provide 1000 new non-self contained homes. The Borough has already met this target as a study for the Wembley Area Action Plan found that by summer 2012 the 1095 student rooms will have been provided in Victoria Hall (completed Sept 2011) and Quintain iQ (to be completed by summer 2012). It also notes that there are a further 1441 within consented schemes. As such there is not considered to be a significant need for accommodation for students and temporary workers.

Notwithstanding this the upper floors of Nos. 2 and 4 Priory Park Road are stated to be in use as HMO's. It is likely that they were originally constructed as apartment blocks and there is no planning history for the change of use from flats to HMO for either property. Notwithstanding this evidence has been submitted to show that the existing upper floors of No. 2 have been used as an HMO for a period of over 10 years while number 4 is described as being in a state of disrepair. The expansion of the proposed hostel into these facilities is not considered to be acceptable as they could be more effectively used as self-contained residential accommodation to meet existing demand.

Demolition of Existing Buildings

The proposal includes the staged demolition of the existing four storey buildings 2-4 Priory Park Road, Priory Mansions and St Lawrence Mansions. These buildings are considered to have some architectural merit being Victorian Mansion Blocks with traditional detailing from this period.

However it should be noted that there is no formal protection for these buildings as they are not within a Conservation Area and are not listed buildings. Therefore if the structures are to be demolished it will only be considered acceptable if the replacement building is of an exceptional design. As explained below this proposal does not meet the Council's expectations in this regard.

Loss of secondary shopping frontage

There are two groundfloor commercial units at 2-4 Priory Park Road. These units form part of the secondary shopping frontage of Kilburn Town Centre which is classified as a Major Town Centre. The proposal will result in the loss of these commercial units without adequate replacement. The proposal provides no justification for the loss of these units as no evidence has been submitted to demonstrate that they have been marketed without demand. As such the proposal will result in a loss of town centre commercial units within the secondary shopping frontage of Kilburn Major Town Centre Shopping Frontage. This would be contrary to planning policy SH9.

Design Scale and Massing

The proposed building to replace the three existing buildings is a modern 6 storey block. The proposed block will have a length of 64.6m fronting onto Priory Park Road, a flat roof at a height of 18.5m and a depth of approximately 13m. The front elevation is articulated through the use of projecting five storey brick element projecting balconies rising to six storeys beyond this. The front elevation is also broken down into four similar elements which are separated by 6 storey glazed openings which also serve to provide natural daylight to the spine corridors. Each of the four elements are further articulated through the use of projecting double balconies and prominent vertical windows. The block is book-ended by six storey glazed openings.

The structure has a flat roof in contrast to the ridged roof of the existing building. The eaves level of the proposed structure is 4.5m higher than that of the existing while the roof will also be 2.5m higher than the ridge-level of the existing building. The front wall of the proposed building is shown to be 1.4m closer to Priory Park Road (with the balconies projecting out a further 1m) while to the rear proposed rear wall is 1.5m deeper than the existing. The setback of the building from pavement on Priory Park Road is between 0.2m-1m. This setback is considered to be insufficient for building of this scale and massing and will make the building appear over-dominant and oppressive within the streetscene. While some efforts have been made to break down the massing, the overall height and scale of the building is such that it outweighs the impact of these.

It is considered that the increased scale and massing of the building is not in keeping with the character and appearance of the area. As such the proposal is not considered to be of an appropriate scale and massing to replace the existing structure.

Layout

There is one main entrance to the building onto Priory Park Road. This is positioned centrally and is prominently positioned at the groundfloor of the widest glazed opening on the front elevation with a width of 3m. There is a central internal staircase and double lift accessed from the main entrance and staircase to all floors on either wing of the building. The building is laid out with rooms on either side of a spine corridor with the rooms overlooking Priory Park Road to the front and indirectly overlooking the rear amenity space and rear gardens and elevations of the dwellings on Glengall Road.

The communal amenity space is to be provided at the lower groundfloor level in an excavated rear garden area. A rear boundary wall of approximately 5.4m in height is proposed along the rear boundary with the gardens of the dwellings on Glengall Road. To the front there will be a small area of soft landscaping but this is limited by the proximity of the proposed building to the front boundary between 0.2m to 1.8m. The lack of setback while it creates issues of privacy for prospective residents which will be discussed later in the report also accentuates the vertical appearance of the building making it appear oppressive in the streetscene.

The refused store and bike store are positioned within the north east wing of the building and have accesses onto Glengall Passage. These spaces can be accessed from within the development site while the bin storage area has an external door which opens out onto Glengall Passage. There is also a secondary door onto Glengall Passage which links with the access. This is shown as opening outwards but the Councils Highways Officer has requested that this open inwards, or be recessed to ensure that the public highway is not blocked. If the application was to be approved a condition would be sought to ensure that this was amended.

Materials

A range of materials are proposed for the building these include red brick to match the red brick prominent on the existing buildings, trespa cladding panels, aluminum framed windows, glass balustrades and panels on the front elevation. Timber trellis fencing is proposed on the groundfloor level to soften the appearance of the structure. The roof will be part sedum roof but is also proposed to contain solar panels while the front projection will have a standard seam zinc roof. These materials are commonly used on modern building although further details and samples would be sought to ensure that they are of a high quality.

Amenity of neighbouring occupiers

The nearest neighbouring properties to the site are the dwellinghouses on Glengall Road which have rear gardens and windows which face the rear elevation of the proposed development. There are also residential properties on the neighbouring site on Priory Park Road which is Oriel Court, a residential block that was erected in the past three years.

The proposed rear elevation will be 4.5m higher than the existing building at eaves level and will be 1.5m closer to the rear boundary with Glengall Road. As such the rear elevation of the proposed building will be between 5.9 and 7.3m from the rear boundary with the properties on Glengall Road. Given that the rear outriggers of the properties on Glengall Road are positioned within 3 to 5m of the same boundary the rear wall of the proposed development will be between 9 and 11m from directly facing habitable room windows. To address the issue of privacy the rear windows on the proposed development project out and are angled so that they do not directly face the rear windows on Glengall road and provide only oblique views over the neighbouring garden. However these windows will still be within 6-8m of the rear boundary and will still create the perception of overlooking for the residents of these properties. A daylight and sunlight study has been submitted which states that there will be no detrimental impact on daylight and sunlight to the neighbouring property. However a wider range of problems occur as described below.

The building will be higher and closer to the boundary than the existing as such there will be a detrimental impact on the amenity of neighbouring residents in terms of the visual impact and the loss of privacy. Although the existing building does not comply with SPG17 requirements in terms of the distance of habitable rooms to the boundary and the height of the building in relation to neighbouring gardens and windows, this does not provide suitable justification for a building with a greater impact on neighbouring properties than the existing. As such the proposed development will be contrary to planning policy BE9 of Brent's UDP 2004 and the guidelines set out in SPG17.

Quality of Accommodation

The applicants have applied for a hostel use but with improved facilities on the existing. It should be noted that the existing hostel accommodation is of a poor quality. There are very few en-suite rooms meaning that residents often have to share bathroom and washing facilities and kitchen facilities. There are no lifts meaning that disabled residents can only be accommodated on the ground floor. Other communal facilities are limited in size while the rear amenity space is of very low quality and not well looked after. Most of the rooms have replacement upvc windows but these are of poor quality and are discoloured. Residents within the hostel have also raised concerns with the quality of the internal insulation as there is a lot of internal noise disturbance from doors and other residents moving on floors above. As a result of this the maximum length of time that residents can stay in the existing rooms is six weeks unless they have en-suite facilities. The

proposed alterations would ensure that each room is en-suite with a kitchenette and could therefore be used to house homeless households for an indefinite period. As such it is important to assess the quality of the accommodation proposed.

The applicants are providing standard room sizes as follows:

Room Type	Area (sqm)
1-bed	14
1-bed Disabled	18-21
2-bed	18-19
2-bed Disabled	25
3-bed	25

The rooms are all single aspect facing north toward Priory Park Road and south towards the rear amenity space. The groundfloor rooms which face directly onto Priory Park Road are setback between 0.2m and 1m from the pedestrian pathway. Given that these rooms are effectively self-contained the quality of accommodation is unacceptable by reason of the lack of privacy for the residents of these rooms. This is of particular concern as residents could be in these rooms for an indefinite period. On the lower groundfloor there are 13 rooms which face out onto the rear amenity space which is at the same level. The sole habitable room windows are screened by a small timber fence set 1m from the window. Beyond this the amenity space will have a maximum depth of 6m from the windows with a wall at a height of 5.5m. These rooms will have an unacceptable impact on the amenity of prospective residents in terms of privacy, outlook and daylight and sunlight. This in conjunction with the low floor areas would result habitable living space that provides a very poor quality of accommodation for prospective residents.

It is noted that the existing hostel use has very poor quality of accommodation for homeless families but again this does not provide justification for intensifying the use and increasing the amount of poor quality living accommodation. The proposed development by reason of the low floor areas of each room, the lack of setback of the groundfloor from the main pedestrian pathway and the lack of privacy and outlook for the rear lower groundfloor units would provide unacceptable quality of accommodation for prospective residents contrary to planning policy BE9 of Brent's UDP 2004 and the guidance set out in SPG17.

Landscape Design

The proposed development due to its scale and massing does not leave any space for amenity to front of the building. To the rear there is communal amenity space in the form of a two sunken gardens and a rear roof terrace. The combined area of this space is approximately 330sqm and the space will be fully accessible for all residents. This space will be the only available amenity space for up to 389 residents. The residents of the hostel may only be staying there on a temporary basis however they will still have a requirement for amenity space and the provision of childrens play space in accordance with appropriate standards. The Council's SPG 17 requirement is for 20sqm per unit created. The proposed development could be providing accommodation for up to 176 households and thus the provision of space will be significantly below the 3520sqm that would normally be required. The provision of the gym and tv room facilities may provide supplementary amenity space but they do not offset the significant shortfall of space provided for residents who would be living within confined space, again, albeit on a temporary basis. The proposed balconies for the units fronting onto Priory Park Road have an area of approximately 1sqm and as such will not bring any significant benefits for potential residents.

The proposed lack of set back for appropriate amenity space at the front of the building fails to provide the setting that is required for a building of this scale and massing while the inadequate area of communal and private amenity will provide a substandard form of accommodation for prospective residents contrary to planning policy BE6 and BE9 of Brent's UDP 2004 and the guidance set out in SPG17.

Transportation

The site is located in a location with excellent public transport accessibility. Priory Park Road and surrounding streets are classified as Heavily Parked Streets and are also within a Controlled Parking Zone. The existing hostel has a parking requirement of 5 spaces (PS13 requires one space per 16 rooms). The proposed hostel use would have a parking standard of 11 spaces. It is not anticipated that there will be a significant increase in parking on surrounding streets as the residents of the proposed hostel will not be able to get a parking permit due to the restriction temporary residents from being eligible for parking permits. Given that the proposed hostel has laundry facilities on site and there is no canteen the proposed use will not have any servicing requirements beyond the refuse and recycling collection.

The waste storage area is positioned on the north east wing of the proposed building. The doors open out in a recessed entrance onto Glengall Passage. The door as proposed is 12m from the Priory Park Road frontage which is over the 10m distance required by the Council's Waste and Recycling Unit for collection purposes. This could however be addressed by moving the entrance door to the storage area to within 10m of Priory Park Road. If the application was to be approved a condition would be attached requiring the submission of revised plans and elevations detailing the door within 10m of Priory Park Road. A secure cycle store is also proposed opening onto Glengall Passage, this will provide space for the parking of 32 bicycles. This provision is in general accordance with Council requirements. The provision of a Travel Plan is not considered to be a requirement by the Council's Highways Engineer as the traffic impact of the proposed development is unlikely to be significant.

Environmental Health

The proposed development is located within an Air Quality Management Area therefore conditions would be required to ensure that construction and demolition is controlled to minimise the impact of increased dust on local air pollution levels. The energy report and the sustainability report state that the development will also have a CHP plant. However in the absence of such details on the type of system to be used, where it will be positioned and the position of the flue it is not possible to assess whether the proposed development would have an acceptable impact on the air quality for the local area.

The proposal will also involve the excavation of the rear amenity space to ensure to provide the lower groundfloor accommodation and rear amenity space. This excavation will need to be undertaken in an appropriate manner to ensure that all potential contaminants that are uncovered are removed. The Council's Environmental Health Officer has confirmed that as this excavation will need to take place any potential contaminants will be removed from the soil and as such a contamination report is not required.

By reason of the failure to provide details of the type of CHP system, its position within the building and the position of the flue the applicant has not demonstrated that there will not be a detrimental impact on local air quality as a result of the proposed development. As such it is contrary to planning policy EP3 of Brent's UDP 2004 and policy CP19 of Brent's Core strategy 2010.

Section 106

The proposed development will have a significant impact on local infrastructure in relation to education, sustainable transport, open space and sports provision within the local area it is situated in. With a development of this size a legal agreement would normally be required to offset the impact of the development by making a contribution towards infrastructure provision within the Borough. No such agreement has been secured with this application although the applicants have expressed a willingness to make a contribution. In the absence of a formal agreement an additional reason for refusal will be attached by reason of the detrimental impact that the proposed development would have on local infrastructure contrary to planning policy CP14, CP15 and the guidance contained in SPD: Planning Obligations.

Conclusion

The proposed demolition of the existing buildings and construction of a proposed six storey 178 room/351 bed hostel is considered to be unacceptable in terms of intensification of the use in relation to similar local provision, design and appearance, impact on neighbouring residents, quality of accommodation provided, impact on the local area infrastructure and sustainability, as set out in the remarks above. Accordingly the application is recommended for refusal for the reasons set out below.

RECOMMENDATION: Refuse Consent

CONDITIONS/REASONS:

- (1) The proposed 178 room/351 person hostel by reason of the over provision of temporary accommodation that does not meet an identified need would fail to provide an appropriate mix of accommodation and would not provide a balanced housing stock contrary to planning policies CP 2 and CP21 of the London Borough of Brent LDF Core Strategy 2010.
- (2) In the absence of an identified future demand for homeless hostel accommodation within the Borough, the proposed use of nos. 2 and 4 Priory Park Road for the provision of self-contained hostel accommodation would constitute the inappropriate provision of a substandard form of residential accommodation on a site capable of providing permanent self-contained affordable residential accommodation for which there is an identified demand, as such the proposal would be contrary to policy CP21 of the London Borough of Brent LDF Core Strategy 2010 and policy EMP9 of the London Borough of Brent Unitary Development Plan 2004.
- (3) The proposed loss of the groundfloor commercial uses at Nos 2 and 4 Priory Park Road would fail to provide a service to visiting members of the public within this designated Secondary Shopping Frontage and for this reason would be detrimental to the vitality and viability of the frontage, and is contrary to UDP policy SH9 of the Adopted Unitary Development Plan 2004.
- (4) The proposed demolition of the existing buildings and erection of a single six storey building by reason of its siting, scale, massing, excessive height and depth and poor quality public realm would fail to constitute an acceptable design to offset the loss of a prominent building that makes a valuable contribution to the streetscene contrary to policies CP6 of London Borough of Brent LDF Core Strategy 2010, policies BE2, BE3, BE7 and BE9 of the adopted London Borough of Brent Unitary Development Plan 2004 and Supplementary Planning Guidance 17: 'Design Guide for New Development'
- (5) The proposed six storey building by reason of its excessive height and depth will have a detrimental impact on the amenity of residents of the properties in terms of loss of privacy, loss of outlook and obtrusive visual impact contrary to planning policy BE9 and Supplementary Planning Guidance 17: 'Design Guide for New Development'
- (6) The proposed single aspect north facing self-contained units by reason of the sole window being positioned in close proximity to the existing pedestrian pathway results in a poor level of amenity for existing and prospective residents in terms of privacy,

daylight and sunlight and is contrary to planning policies BE9 and H18 of Brent's UDP and the guidance contained in SPG 17: 'Design Guide for New Development'.

- (7) The proposed single aspect lower ground floor residential units by reason of the sole windows being positioned in close proximity to the communal amenity space, without sufficient screening, and in close proximity to the high rear boundary wall would result in poor levels of outlook, privacy, daylight and sunlight providing a substandard quality of accommodation for the prospective residents contrary to planning policy BE9 and Supplementary Planning Guidance 17: 'Design Guide for New Development'
- (8) The proposed residential development by reason of the inadequate area and quality of amenity space and the excessive distance from the units to the bin store and from the bin store to the collection point, is considered to provide a substandard form of accommodation contrary to policies BE6, BE7, H12 and TRN10 of the adopted London Borough of Brent Unitary Development Plan 2004 and Supplementary Planning Guidance 17: 'Design Guide for New Development'
- (9) The proposed intensification of the hostel use, in the absence of a legal agreement to mitigate additional demand placed on services in the locality, particularly given similar local provision, will result in additional pressure on parking demand and transport infrastructure, or any contribution to sustainable transport improvements in the area, an increased pressure on existing open space in an area of open space deficiency, without contributions to enhance open space, an increased pressure for public sports facilities, without any contribution to the provision of sports facilities, and an increased pressure on education infrastructure, without any contribution to educational improvements. As a result, the proposal is contrary to policies CP14 and CP15 of London Borough of Brent LDF Core Strategy 2010, policies STR19, TRN4, TRN23 and OS7 of the adopted London Borough of Brent Unitary Development Plan 2004 and Supplementary Planning Document: "S106 Planning Obligations".
- (10) In the absence of details on the proposed CHP plant in terms of its specifications, location within the development and location of the flue the applicants have failed to demonstrate that there will not be a detrimental impact on air quality in the local area contrary to planning policy CP19 of the London Borough of Brent LDF Core Strategy 2010 and policy EP4 of the London Borough of Brent Unitary Development Plan 2004.
- (11) In the absence of a legal agreement to control the matter, the proposed development would fail to achieve and employ sustainable design principles and would therefore not contribute towards energy conservation, air quality or sustainable construction. This would significantly impact the natural and social environment, contrary to policies STR3 and BE12 of Brent's Unitary Development Plan 2004 and Supplementary Planning Guidance No. 19: "Sustainable Design, Construction & Pollution Control".

INFORMATIVES:

None Specified

Any person wishing to inspect the above papers should contact Robin Sedgwick, The Planning Service, Brent House, 349 High Road, Wembley, Middlesex, HA9 6BZ, Tel. No. 020 8937 5229