

 **Planning Committee Map**

Site address: Thames Water Depot & Training Sh, 225 Harlesden Road, London, NW10 3SD

© Crown copyright and database rights 2011 Ordnance Survey 100025260



This map is indicative only.

**RECEIVED:** 1 February, 2012

**WARD:** Willesden Green

**PLANNING AREA:** Willesden Consultative Forum

**LOCATION:** Thames Water Depot & Training Sh, 225 Harlesden Road, London, NW10 3SD

**PROPOSAL:** Residential development of 41 dwellings, consisting of a row of 2-storey terrace houses, a 2 to 3-storey block and a 4 to 5-storey block, with associated parking, infrastructure and landscaping.

**APPLICANT:** Notting Hill Housing

**CONTACT:** Capita Symonds

**PLAN NO'S:**

10004-GA-000 S

10004-GA-001 Q

10004-GA-002 L

10004-GA-004 N

10004-GA-011 J

10004-EL-001 G

10004-EL-002 D

10004-SE-000 E

10004-3D-001 A

2329\_02 A

2329\_03 A

---

**RECOMMENDATION**

Refusal

**EXISTING**

The subject site is accessed from Harlesden Road and is adjacent to Willesden Reservoir. The site accommodates redundant Thames Water pumping equipment, warehousing/storage and workshop type space (B1/B8 uses). It is largely covered by historic hardstanding with a group of cherry trees in the north west corner subject to a Tree Protection Order.

The shape of the site is roughly triangular and to 2 of the 3 sides the side is bordered by 2-storey terrace houses.

The reservoir is identified as a Site of Nature Conservation Importance (Grade II).

**PROPOSAL**

See description above

**HISTORY**

No relevant recent planning history

**POLICY CONSIDERATIONS**

**National Planning Policy Framework**

The NPPF was published on 27 March and replaces Planning Policy Guidance and Planning

Policy Statements with immediate effect. It is intended to make the planning system less complex and more accessible, to protect the environment and to promote sustainable growth. It includes a presumption in favour of sustainable development in both plan making and decision making and its publication.

Saved policies from the adopted UDP will have increasingly less weight unless they are in conformity with the NPPF and can be demonstrated to be still relevant. Core Strategy policies will also need to be in conformity with both the London Plan and the NPPF and have considerable weight.

Where PPG's, PPS's, LDF Core Strategy and UDP saved policies are referred to in the report below they have been considerations in the assessment of the application. However, the recommendation is considered to comply with the NPPF.

### **London Plan 2011 and Mayor's Community Infrastructure Levy (CIL)**

This applies to relevant developments from 01/04/2012

### **Brent's UDP 2004**

#### **BUILT ENVIRONMENT**

- BE1 Urban Design Statements
- BE2 Townscape: Local Context and Character
- BE3 Urban Structure
- BE5 Urban Clarity and Safety
- BE6 Public Realm: Landscape Design
- BE7 Public Realm: Streetscape
- BE9 Architectural Quality
- BE12 Environmental Design Principles

#### **HOUSING**

- H1 Additional Housing
- H2 Requirement for Affordable Housing
- H3 Proportion of Affordable Housing
- H9 Dwelling Mix
- H11 Housing on Brownfield Sites
- H12 Residential Quality – Layout Considerations
- H13 Residential Density

#### **EMPLOYMENT**

- EMP9 Local Employment Sites.

#### **TRANSPORT**

- TRN3 Environmental Impact of Traffic
- TRN10 Walkable Environments
- TRN14 Highway Design
- TRN23 Parking Standards – Residential Developments
- TRN35 Transport Access for Disabled People and others with Mobility Difficulties
- PS14 Parking Standards – Residential Development
- PS15 Parking for Disabled People
- PS16 Bicycle Parking

#### **OPEN SPACE, SPORT & RECREATION**

- OS13 Development on Site of Borough (Grade II) and Local Nature Conservation Importance

## **Core Strategy**

CP2 Population and Housing Growth  
CP6 Design & Density in Place Shaping  
CP15 Infrastructure to Support Development  
CP18 Protection and Enhancement of Open Space, Sports and Biodiversity  
CP19 Brent Strategic Climate Change Mitigation Adaptation Measures  
CP21 A balanced Housing Stock

## **Supplementary planning guidance 17: Design Guide for New Development Supplementary Planning Document: S106 Planning Obligations**

### **SUSTAINABILITY ASSESSMENT**

A Code for Sustainable Homes pre-assessment has been submitted stating that the applicant is aiming to achieve code level 4, the conclusion of the report is that should the assumptions mentioned in the report for achieving CfSH Level 4 be implemented it could be achievable. However without the design stage being finalised no guarantee could be given. Policy CP19 of Brent's Core Strategy requires CfSH Level 3 be achieved outside of growth areas.

In terms of renewable energy, photovoltaic panels are proposed, from which each unit would benefit. Energy and water saving measures are proposed as well as green roofs.

The London Plan (Policy 5.2) requires that major developments achieve a carbon dioxide emissions reduction of 25% beyond the requirements of Building Regulations, this is also a requirement of CfSH Level 4. The documentation does not confirm that this target will be achieved and the related point on the Sustainable Development Checklist is not ticked, it does however identify that a carbon dioxide emissions reduction of at least 10%.

A sustainable development checklist has been submitted with the application, a score of 50% is required though currently only 28.7% is achieved. If officers were minded to recommend approval certainty would be required that 50% would be achieved and this would form part of a s106 agreement.

### **CONSULTATION**

#### **External**

Neighbouring occupiers were consulted on 1st February 2012, a press notice and site notice were also published, objections have been received:

- Notting Hill Housing are trying to cram as many properties as possible into a very limited space.
- The proposal will impact on sunlight and privacy of surrounding neighbours
- Balconies will increase overlooking
- Any building up to 3 or 4 floors will be of concern
- The height will make it look like an estate rather than a tasteful area of enclosed housing
- The block will be an overly dominant and incongruous feature
- Buildings should be no higher than the houses they overlook
- Buildings should be in keeping with existing houses i.e. red brick
- Light pollution
- Idyllic rarity of not being surrounded by bricks and noise is being lost and the project is objected to.
- Increased opportunity for crime in the area caused by opening up this area - neighbouring gardens will be more accessible.
- Impact on dwelling adjacent to only access road - this will cause vibration, noise, pollution, concern for privacy and security and crime.
- The narrow access and tight bend will be a safety issue for pedestrian and vehicles

- Scale needs to be revised to minimise impact on existing residents.
- Loss of trees and natural habitat - has there been a study to ensure no bats are there?
- Concern about the environment- the reservoir is a place for birdlife and it is peaceful
- Concern about impact of construction work on mature plants in neighbouring gardens
- The amount of parking proposed is unlikely to accommodate all cars from the flats, it will increase traffic along Harlesden Road polluting and damaging the environment
- The staff car park at the hospital is too small so there is already an overflow of parking into residents spaces.
- Harlesden Road is very busy and dangerous
- What is happening with the reservoir - is it empty? In the past water has flooded neighbouring garden shed.
- The schools and doctors are heavily/over subscribed - the increase in people is too much for local amenities.
- New schools are needed before new housing
- The noise inconvenience, pollution and damage to the area outweighs the reason for building on the site
- Any work should be during winter as windows need to be open in summer and this will let in dust and noise
- Insufficient water pressure

Cllr Jones - Concern about highway safety, suggest that vehicles access and exiting the site be left turn only for safety reasons.

Natural England - The ecological survey submitted identified that there will not be any significant impacts on statutory protected sites, however the council should maximise opportunities in and around the development for building in beneficial features as part of good design in accordance with PPS9.

Thames Water - Conditions should be required regarding surface water drainage, discharge of groundwater, require petrol/oil interceptors fitted in all car parking/washing facilities, require a piling method statement to be submitted and approved by LPA. Informative that no building will be allowed within 5m of large water mains adjacent to the proposed development.

### **Internal**

Highways - Comments discussed below

Environmental Health - Conditions would be required including air quality management, light pollution specifically regarding external lighting, contaminated land (remediation and verification) - remediation should also include more gas monitoring visits.

### **REMARKS**

#### **Principle**

The principle of a residential development in this location is considered to be acceptable. The site has not been used in association with the reservoir or for other purposes for a significant amount of time.

#### **Urban Design**

##### *Layout*

The site is accessed from a single access road leading from Harlesden Road. The road would lead through the site to the 3 buildings proposed. On the left, backing onto gardens on Harlesden Road, a 2 and 3-storey building is proposed (south terrace), on the right, between the access road and the reservoir a 4 and 5-storey block is proposed (apartment block) and to the north, backing onto Kings Road, a 2-storey row of terrace houses is proposed (north terrace).

The impression of the public realm within the site is substantially one of hardstanding. Retained Thames Water single storey structures and parking bays flank the road once the depth of the Harlesden Road property has been passed. Behind and to the side of the parking bays an area of soft landscaping is proposed which would partially soften this area. Beyond this point the

apartment block and southern terrace flank the road, a soft landscaped buffer is proposed adjacent to the southern terrace but the apartment block would be hard against the pavement which would continue for a distance of about 31m which would have a severe and dominating impact on the character of the residential environment.

The northern terraces each have a private front curtilage providing a parking space and waste storage, about 1/3 of the area of each space would be soft landscaped.

#### *Street level activity & presence*

In terms of the quality of activity created at street level the apartment block and the southern terrace are considered to be poor in their arrangement. The elevation of the apartment block which dominates the narrow road at ground floor has a poor street level presence primarily consisting of blank walls with entrances into storage spaces. The relationship of this and the overhanging upper floors would be harsh and would not create a welcoming residential environment.

The rear entrance arrangement for the flats within the southern terrace also has an impact on the quality of streetscene and activity created. A gate is proposed through to a communal rear entrance tucked away from the access road, no street frontage doors are proposed so while windows look out on all elevations of the terrace and at all floors, there is an obvious lack of front doors facing onto the road, front doors are important in urban design to indicate and create activity, ownership of space and a residential environment.

The northern terrace alone directly addresses the street level with both windows and entrance doors, in general however the design and relationship of buildings with the vehicular and pedestrian accessway would create an environment with limited activity resulting in areas which could feel unsafe and not directly overlooked.

#### *Scale*

Although as explained above, there is general concern about the amount of development proposed for the site it is the footprint, massing and bulk of the apartment block which is of most concern in terms of the overall scale of the proposals. Officers consider the correct treatment of the site to be that of a backland site and have consistently stated that the 4 to 5-storey block is overbearing and disproportionate within the context of what are predominantly surrounding 2-storey houses. It may be that a building taller than these adjoining properties could be acceptable, but the current iteration clearly represents an overdevelopment within this constrained plot.

The primary consideration, as far as scale is concerned, centres on the impact of the proposed development on the character and appearance of the locality. The siting of the new buildings extends across too much of the site, providing limited space around. Gaps between buildings, and between buildings and boundaries, are restricted and it is considered that a buildings of this size, siting, height and bulk, would have an unacceptable impact on the character of the area providing for a poor quality of amenity. As explained above, the spaces around the buildings tend to be dominated by hard surfacing and Officers consider that any building, particularly one of the size and height of the 4/5 storey block, should be sited within its own landscaped setting with space around the building to provide for an attractive form of development.

Reference has been made by the applicants to the taller blocks at the southern end of the reservoir acting as some form of precedent. However, Officers wish to highlight that there are specific differences there, including their position fronting a highway and their arrangement on the site, set in far larger plots rather than the proposed densely developed site here.

### **Impact on Neighbouring Amenity**

#### *Apartment block*

Drawing 10004-SE-000 E demonstrates that the form of the building has been designed largely

within the guidance angles of SPG17, these angles taken from the rear elevations and garden boundaries of adjacent residential properties are set out to inform designs particularly in terms of preventing a detrimental impact on daylight/sunlight. The 4 to 5-storey block falls below the recommended angles but the height of the apartment block would have an overbearing impact on neighbouring amenity given its disproportionate scale. While adequate separation distances are achieved in technical terms, the scale of the apartment block within the constrained site will result in it dominating outlook from surrounding properties and adversely impacting on the quality of the residential environment.

#### *Southern terrace*

The third floor proposed on the southern terrace to accommodate the fifth flat results in a tight relationship with neighbouring gardens with a habitable room window about 10m from the boundary and the creation of a roof terrace. Originally unrestricted access to the flat roof was shown but a revision has included a defined area though this is not shown on elevations, unrestricted access to the roof would result in residents overlooking neighbouring gardens from a second floor level which would be detrimental to privacy.

#### *223 & 227 Harlesden Road*

227 Harlesden Road is a 3-storey building, built with the ground floor as an ancillary office space to the depot use, the 2 floors above are residential. This building is about 6.5m back from the edge of the access road, part of which is private curtilage but some also forms part of the application site and the proposal includes the addition of trees in front of the site within the application site boundary.

223 Harlesden Road (containing 2 flats) is the end of terrace building adjacent to the entrance to the site, its side garden boundary, which is a brick wall, is the boundary with the access road. The height of the wall does not screen the ground floor windows and this property will be particularly sensitive to the proposed increase in activity on the access road. A revision has introduced a buffer which is 1m wide alongside the house, the supporting information states that this is in the form of planter boxes (could be moved if ever necessary for reasons connected with Thames Water access requirements). Insufficient detail has been provided to assess whether this will mitigate the impact of passing vehicles and pedestrians in terms of disturbance and privacy. An occupant has objected for reasons of privacy, pollution, noise and security, moveable planter boxes are unlikely to provide a considerable scale of planting and officers are of the opinion that this relationship is a significant issue which must be dealt with satisfactorily up front rather than leaving for consideration at a later date.

### **Quality of Accommodation**

#### *Internal space*

The document states that the accommodation is designed in line with space standards as defined in the London Housing Design Guide.

In general the unit sizes which are stated for the apartment block exceed the London Plan standards, however 3x3-bed (5 person) are 84.5sqm narrowly missing the 86sqm target.

The floor areas for the terraces are not stated on plans but have been confirmed recently by the agent, all units meet and exceed the London Plan targets.

All units, in all parts of the proposal, either have a dual aspect of where single aspect are facing east or west. However, officers are concerned that the relationship between the ground floor units in the apartment block and the steeply rising reservoir. It is not well represented on drawings and could result in very restricted outlook. The southern unit has only 1.5m between its window and the boundary while the central units are 3.5m back from the reservoir boundary.

### *External space*

Houses or ground floor flats suitable for family accommodation should have access to 50sqm of amenity space, while 20sqm should be provided for other flats within blocks.

The dwelling houses each have access to a private garden of at least 50sqm. The extent of amenity space allocated to the ground floor 3-bed flats in the apartment block is estimated (from the 1:500 scale site layout) at about 30sqm. The space is indicated as hardstanding and its quality is further limited by its narrowness, particularly to the northern and southern units. Half of the depth of the amenity space to the 2 central units would be overhung by balconies above.

The flats in the southern terrace have a communal amenity space of 50sqm, the ground floor units also have a private space each of about 17sqm while the second floor flat has a 12sqm roof terrace. This provision in total almost achieves the 20sqm per unit recommendation in SPG17.

The flats in the apartment block, above ground floor, each have access to a balcony. These are a minimum of 4.7sqm for the 1-bed units and 7.5sqm for 2 and 3-bed units, which are useable spaces but do not achieve SPG17's recommendation of 20sqm.

The site also benefits from a communal amenity space at the northeast corner which provides a further 450sqm. This would provide play space for children and in quantitative terms could mitigate the otherwise small provision for flats on the upper floors. The quality and quantity of space provided for the ground floor units remains poor.

### **Mix and Tenure**

The scheme proposes 41 homes, with 3 x 1 bed, 24 x 2 bed and 14 x 3 bed homes. This unit mix offers a range of accommodation sizes which is considered acceptable, and provides for 34% family sized homes of three bedrooms or more in line with Brent's Local Development Framework Policy CP2, which requires at least 25% of new homes to be family sized.

The scheme is proposed as 100% affordable housing, with 13 affordable rent homes and 28 shared ownership homes, that is, a ratio of 31%:69% affordable rent to shared ownership housing. The tenure mix is not in line with London Plan Policy 3.11A that states affordable housing provision should be delivered at a ratio of 60%:40% affordable rent to intermediate rent or sale, nor Brent's Local Development Framework strategic objective that affordable housing be delivered at a ratio of 70%:30% affordable rent to intermediate rent or sale.

The applicant argues that tenure mix policy need only apply to 50% of the affordable housing delivered on the proposed scheme as Brent's Local Development Framework Policy CP2 sets the target that 50% of new homes should be affordable. Officers are of the view that this argument is unsound. The CP2 target that 50% of new homes should be affordable is a borough wide target and does not mean that in line with London Plan Policy 3.12A the Council will not seek to maximise the reasonable amount of affordable housing when negotiating affordable housing on individual schemes. Second, the tenure mix guidance set out in London Plan Policy 3.11A and Brent's Local Development Framework applies to new affordable housing provision and is informed by housing needs and priorities; the tenure mix guidance does not apply to affordable housing targets. Both these points, as well as the potential consequences of the widespread misinterpretation of affordable housing policy in this manner, have been made to the applicant.

However, there are a number of exceptional situations whereby the Council may relax its approach. Here officers can support deviation from tenure mix policy on the grounds of financial viability or the need to promote mixed and balanced communities. The applicant has submitted a financial viability assessment that demonstrates that due to the market land value of the site the



proposed scheme is not financially viable. Whilst the use of market land values rather than existing use values when testing development viability is questionable, for example in cases where a developer has clearly paid too much for the site, Officers are in this particular case prepared to accept the applicant's financial viability assessment as grounds for this deviation from tenure mix policy.

## **Highways**

### *Parking*

The site is in an area of moderate public transport accessibility (PTAL 2), there are three bus services within 8 minutes walk. The site provides 31 parking spaces which is below the maximum 54 spaces which could be provided under PS14 of Brent's UDP 2004. However policy TRN23 requires that where the full parking standard is not provided consideration be given to the impact on on-street parking in the area. 50% of the parking standard is attributed to social rented units and 75% of the maximum allowance to shared ownership units, based on the proposed mix this would result in 38 cars leaving 7 cars needing to park off-site.

The potential overspill parking gives significant concern as the site has no highway frontage and most adjoining houses along this length of Harlesden Road have no off-street parking. Neighbours, in their objections, report finding that parking is regularly difficult though in Brent's 2004 UDP the road was not identified as being 'Heavily Parked'. Unrestricted overspill parking cannot be accepted as it would be detrimental to highway safety and the safe and free flow of traffic and pedestrians.

A 'car-free' agreement, removing the right of all future residents of the development to an on-street parking permit, cannot be supported as the PTAL is too low (as described above). This results in development where future occupants, unable to own a car, have difficulty reaching public transport and essential services, officers consider that this would not constitute a sustainable development.

Three spaces have been indicated for the four wheelchair units, this falls short of the requirement of one space per wheelchair unit and for 10% of spaces to be marked as disabled spaces in affordable housing schemes. In order to comply with the London Plan at least 10% of spaces within unallocated areas should be provided with electric vehicle charging points.

The quantitative provision of cycle parking is acceptable however 16 of the spaces are external so offer no weather protection - a suitable lockable shelter would be required.

### *Access Road*

The proposed access road would be laid out as shared surface which would require extensive resurfacing in coloured block paving, this would need to incorporate a differing colour to indicate pedestrian priority areas within the site. A pinch point of 3m width is indicated adjacent to the apartment block but the inclusion of a footway on the eastern side of this length means that adequate protection is still provided for pedestrians. Further details of lighting and drainage would be required by condition.

The turning point at the northern end of the site is acceptable.

The entrance into the site needs to provide a general minimum carriageway width of 4.8m, which allows some scope to incorporate protective margins/planting alongside the boundary and retaining walls on either side. Kerb build-outs with a 4m kerb radii and raised entry treatment are required to help improve visibility and aid turning into and out of the site - this should be combined with a kerb build-out outside 193-195 Harlesden Road to provide a length of sheltered parking complementary to the traffic calming proposals for the street.

### *Transport Statement*

The proposal is estimated to generate 7 arrivals/36 departures in the morning peak hour and 26 arrivals/20 departures in the evening peak hour, of which 3 arrivals/8 departures in the morning and 6 arrivals/5 departures in the evening are estimated to be by car.

Traffic surveys undertaken in Harlesden Road showed two-way flows of 528 vehicles in the morning peak hour and 524 vehicles in the evening peak hour past the site. As such the additional traffic generated by the development would amount to only about 2% of existing flows in the street - this is not considered significant.

### *Reservoir servicing requirements*

It is essential that access is maintained to the reservoir for servicing, this is generally in the form of a van, which will park in the service yard, 2-3 times per week (the service yard is assumed to be the space adjacent to 227 Harlesden Road).

In the event that repair work is required to the reservoir or associated equipment, access must be maintained for a crane. The occurrence of this instance may be very unlikely but it needs to be demonstrated that this can be accommodated without unacceptably conflicting with the ability of residents to leave and access the site. No further detail has been submitted leaving this issue unresolved.

### **Ecological report**

Trees and hedgerows along the northern and western boundaries of the site are rated as intermediate to high in habitat value. Naturally developing dense scrub, amenity grassland and introduced scrub are low or intermediate in value.

All buildings and landscaping on the site were surveyed for signs of fauna, with a particular focus on bats. Within the buildings it is apparent that some feral pigeons only are roosting.

There are no habitats of international, national or local importance that would be directly or indirectly affected and no evidence of protected species have been recorded on the site. The key features to be retained include the areas of amenity grassland along the eastern boundary, this could be managed more sympathetically to allow the grass to grow taller and encourage a more diverse flora to develop, officers are concerned that the proximity of the building to the boundary and the proposed communal amenity space would conflict with this. Vegetation/trees on the western boundary would also be maintained.

### **S106**

As an affordable housing scheme the development would be exempt from the Mayor's CIL however Brent's standard charge would apply, for affordable housing this is a reduced rate of £2,400 per bedroom. If officer's were minded to support the application a contribution of £223,200 would be sought towards mitigating the impact of the increased occupants on the infrastructure of the area including education (about which neighbours have expressed concern), sustainable transportation, open spaces and sport facilities.

### **Conclusion**

While the principle of a residential development is acceptable the proposal has a number of serious shortcomings which cumulatively result in an unacceptable scheme which would be detrimental to neighbouring amenity, highway safety and would fail to provide an acceptable quality of residential environment for future occupants. Primarily, given the overbearing scale and bulk of the apartment block and the dominance of hardstanding within the site, it is clear that the proposal represents an overdevelopment of this backland site. The inability to balance the provision of sufficient parking for future occupants alongside a good quality street level residential environment further demonstrates this point.

## **RECOMMENDATION: Refuse Consent**

### **CONDITIONS/REASONS:**

- (1) The proposal would result in a poor quality urban environment, in terms of the poor relationship of buildings to the narrow vehicular and pedestrian access way, particularly the proximity and scale of the 4/5-storey building and the dominance of hardstanding across the site, the lack of activity at ground floor level to clearly define ownership or provide informal surveillance, and the arrangement of communal amenity spaces adjacent to parking bays and on the outer edges of the development. As such the proposal is contrary to policies BE2, BE3, BE5, BE6, BE7, BE9, H12, H13 and TRN10 of Brent's UDP 2004 as well as *SPG17: Design Guide for New Development*.
- (2) The proposal, by reason of the scale, bulk and dominance of buildings across the site in general and the massing, height and scale of the apartment block in particular, is disproportionate to and detrimental to the backland site and context of 2-storey houses. The proposal therefore represents an overdevelopment within this constrained plot which would be detrimental to character and appearance of the locality and would have an overbearing impact on neighbouring amenity. The proposal is contrary to policies BE2, BE9, H12, H13 and H15 of Brent's UDP 2004 as well as *SPG17: Design Guide for New Development*.
- (3) The significant increase in traffic, both vehicular and pedestrian, without adequate mitigation would have a detrimental impact on the occupiers of 223 Harlesden Road specifically in terms of privacy. A poor quality of detail has been submitted to demonstrate this can be acceptably addressed and as such the proposal would be harmful to the amenity of neighbouring occupants and is contrary to policy BE9 of Brent's UDP 2004 and *SPG17: Design Guide for New Development*.
- (4) In the absence of a legal agreement to control the matter, the development would result in additional pressure on transport infrastructure, without a contribution to sustainable transport improvements in the area, an increased pressure for the use of 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 education improvements. As a result, the proposal is contrary to policies STR19, TRN4, TRN23 and OS7 of the adopted London Borough of Brent Unitary Development Plan 2004 and Supplementary Planning Document;- s106 Planning Obligations.
- (5) In the absence of a legal agreement to control the matter, the proposal fails to comply with the principles of sustainable development and would be harmful to the aims and objectives of the Council, which seek to ensure that new development and land uses achieve sustainable development, and is therefore contrary to Policies STR14 and BE12 of the Brent Unitary Development Plan 2004 and the guidance contained within Supplementary Planning Guidance SPG19: "Sustainable Design, Construction and Pollution Control".
- (6) The level of provision of parking within the site would result in overspill parking on Harlesden Road, this unrestricted increase in demand for parking cannot be

accommodated and would be detrimental to the free flow of traffic and pedestrians and highway safety, in a location where a 'car-free' agreement cannot be implemented as access to public transport is insufficient to result in a sustainable 'car-free' scheme. The proposal fails to comply with TRN2, TRN4, TRN23 and TRN24 and PS14 and the National Planning Policy Framework.

**INFORMATIVES:**

None Specified

Any person wishing to inspect the above papers should contact Liz Sullivan, The Planning Service, Brent House, 349 High Road, Wembley, Middlesex, HA9 6BZ, Tel. No. 020 8937 5377