

COMMITTEE REPORT

Planning Committee on
Item No
Case Number

19 June, 2019
03
18/4273

SITE INFORMATION

RECEIVED	6 November, 2018
WARD	Wembley Central
PLANNING AREA	
LOCATION	Wembley Youth Centre and Land next to Ex Dennis Jackson Centre, London Road, Wembley, HA9
PROPOSAL	<p>Demolition of community centre and erection of three residential blocks ranging from three to seven storeys in height comprising a total of 170 residential units (67 x 1 bed, 82 x 2 Bed, 13 x 3 Bed and 8 houses) with community centre, new vehicular and pedestrian access, provision for car parking, cycle and refuse storage, amenity spaces and gardens and associated landscaping.</p> <p>The proposed development does not accord with the provisions of the development plan in force in the area as it seeks to develop land designated as open space within Brent's Core Strategy policy CP18.</p>
PLAN NO'S	Refer to condition 2.
LINK TO DOCUMENTS ASSOCIATED WITH THIS PLANNING APPLICATION	<p><u>When viewing this on an Electronic Device</u></p> <p>Please click on the link below to view ALL document associated to case https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=DCAPR_142578</p> <p><u>When viewing this as an Hard Copy .</u></p> <p>Please use the following steps</p> <ol style="list-style-type: none">1. Please go to pa.brent.gov.uk2. Select Planning and conduct a search tying "18/4273" (i.e. Case Reference) into the search Box3. Click on "View Documents" tab

RECOMMENDATIONS

That the Committee resolve to GRANT planning permission subject to:

- A. Referral to the Mayor of London (stage 2 referral)

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 (3 years)
2. Approved Plans
3. Affordable Housing Provision
4. Temporary use defined as 24 months maximum per tenancy for Block C
5. Community Centre use (D1) to be secured
6. Community Centre hours of use defined
7. Parking, bicycle stores and bin stores to be provided pre-occupation
8. Water consumption to be limited in line with policy
9. Public parts of development to be secured for public access
10. C3 to C4 permitted development rights to be revoked
11. At least 10% wheelchair accessible units to be secured
12. Carbon offsetting contribution to be paid through agreement
13. Considerate Constructors Scheme to be joined
14. Overheating report measures to be secured
15. Air Quality report measures to be secured
16. Drainage/SUDS report measures to be secured
17. Ecology report measures to be secured
18. Nominations agreement to be submitted
19. Temporary accommodation management plan to be submitted
20. 6th floor terrace to be subdivided and details submitted
21. Permit free restriction applied to development
22. Footways/substation location to be amended on revised plans
23. Enter into S38/278 Highways agreement to complete highways works
24. Submit and monitor a travel plan
25. Parking management plan to be submitted
26. Construction logistics plan to be submitted
27. Delivery and servicing plan to be submitted
28. London Underground detailed drawings to be submitted

29. Future connection to district heating network to be provided
30. Noise and vibration report to be submitted
31. Construction Management Statement to be submitted
32. Contaminated land studies to be undertaken and remediation if necessary
33. Details of external lighting to be submitted if necessary
34. Surface water infrastructure to be upgraded OR occupation phasing plan to be agreed with Thames Water
35. Piling method statement to be submitted
36. Landscaping and playspace detailed plans to be submitted
37. Plant noise levels to be tested
38. External material samples to be submitted
39. Highway surface material details/samples to be submitted
40. Photovoltaic Array details to be submitted
41. Arboricultural method statement to be xxx
42. Training and employment obligations to be secured
43. Electric Vehicle Charging Points to be secured in line with GLA policy
44. Communal satellite to be provided to avoid multiple satellite dishes
45. Community Access Plan for the community centre to be submitted

Informatives

- CIL liability
 - Party wall information
 - Building near boundary information
 - Notify highways service of intent to commence works
 - Guidance notes from Thames Water
 - Guidance notes from Environment Agency
 - Guidance notes from London Underground
 - Guidance notes from Network Rail
 - London living wage note
 - Fire safety advisory note
 - Any other informative(s) considered necessary by the Head of Planning
1. 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.
 2. 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: Wembley Youth Centre and Land next to Ex Dennis Jackson Centre,
London Road, Wembley, HA9

© Crown copyright and database rights 2011 Ordnance Survey 100025260



This map is indicative only.

PROPOSAL IN DETAIL

The application will seek approval of a new Council led development which proposes the demolition of an existing community youth centre and replacement with three buildings containing a total of 170 residential units and a re-provided community centre.

The proposed development would be provided across three buildings that extend to heights of between three and seven storeys.

The following uses are proposed:

NAIL (New Accommodation for Independent Living) Residential Units (25 total)

- 17x studio flats
- 8 x 1 bedroom flats

Residential Units providing temporary accommodation (53 total)

- 32x 1 bedroom flats (which are adaptable to a 2 bedroom layout)
- 21x 2 bedroom flats (which are adaptable to a 3 bedroom layout)

General Purpose Residential Units for Affordable Rent (92 total)

- 10x 1 bedroom flats
- 61x 2 bedroom flats
- 13x 3 bedroom flats
- 8x 3 bedroom houses

Community Centre (293sqm indoor space + 168sqm outdoor space)

The site is to be accessed via two new cul-de-sacs of 5m-6m width plus footways from the end of London Road. 42 car parking spaces are proposed (including 20 disabled spaces). Bicycle stores are proposed within the private housing and temporary housing blocks.

Street tree planting, communal gardens for the three blocks as well as a publically accessible linear park and public play facilities are proposed within the new development as well.

EXISTING

The site forms a large tract of land, almost one hectare in size. The land is to the east of a suburban residential part of Wembley formed of terraced housing around London Road and Cecil Avenue. The land is immediately to the west and south of the Ark Elvin Academy playing fields. The site's present uses include the active Wembley Community Centre on its northern side and the vacant Dennis Jackson Centre on its southern side, together with an area of hardstanding with marked out parking bays.

The site is immediately to the north of the Wembley Brook watercourse, which separates the subject site from the railway to the south. The land surrounding the brook is designated as a wildlife corridor as well as a Site in Nature Conservation (SINC).

SUMMARY OF KEY ISSUES

The key planning issues for Members to consider are set out below. Members will need to balance all of the planning issues and the objectives of relevant planning policies when making a decision on the application:

1. **Representations received:** A number of local representees (4 individual objections and one petition with 57 signatures) have objected to this application for a variety of reasons. Officers consider that the proposal is acceptable and that none of the grounds upon which

objectors resist the proposal give rise to a reasonable argument that the proposal should be resisted in planning terms. A local primary school which also adjoins the playing fields has voiced support for the development.

2. **Provision of new affordable homes:** Your officers give great weight to the viable delivery of a substantial number of affordable homes, in line with the adopted Development Plan. The scheme does not include private market housing.
3. **Provision of an improved, high quality community centre:** The development will replace the existing community centre with a high quality, open plan community facility with step free access, complete with a new public children's play space immediately outside. The new facility will be smaller than the existing facility in terms of footprint, but will be far more usable and formed of one large space rather than a number of fragmented spaces as is the case with the current centre.
4. **Design, layout and height:** The proposal replaces a land without clear function, mainly formed of a car park and tree cover, with a sensitively designed housing development. It utilises good architecture with quality detailing and materials in order to maximise the site's potential whilst regulating its height to respect surrounding development.
5. **Quality of the resulting residential accommodation:** The residential accommodation proposed is of sufficiently high quality. The mix of units is in accordance with the standards within the London Plan and reasonably well aligned with the Core Strategy target mix. The flats would have good outlook and light. The amount of external private/communal space is slightly below our standard, but not to a significant extent and significant new landscaped public realm is proposed, including a linear park, which improves this offer.
6. **Neighbouring amenity:** There would be minimal detrimental impacts to neighbouring residential properties, as measured in accordance with BRE guidance for light and only one minor breach of the Council's SPD1 guidelines for protecting light and outlook to neighbours. The overall impact of the development is considered acceptable, particularly in view of the wider regenerative benefits.
7. **Highways and transportation:** The scheme is to provide suitable provision of car and cycle parking and will encourage sustainable travel patterns and mitigate the potential for over-spill parking by being a 'permit-free' development, with the exception of blue badge parking spaces. Creation of new public highways as well as improvements to the existing London Road are being secured.
8. **Trees, landscaping and public realm:** 29 trees are to be lost on site, although 85 new trees are proposed to be planted alongside a comprehensive landscaping scheme. Brent's tree and landscaping officers have reviewed the plans and welcome the landscaping proposals and, subject to their implementation, would not object to the existing tree losses. It is noted that the tree losses are from within land formally protected as open space however it is not considered that the losses are significant in the context of the character of the wider open space designation and when it is weighed against scale and quality of the replacement scheme.
9. **Environmental impact, sustainability and energy:** The measures outlined by the applicant achieve the required improvement on carbon savings within London Plan policy. Conditions will require further consideration of carbon savings prior to implementation.

RELEVANT SITE HISTORY

There is no planning history for this site.

CONSULTATIONS

73 neighbouring properties along London Road and Cecil Avenue were notified of this proposal for a minimum of 21 days on the 21st of November 2018. Ark Elvin Academy, whose playing fields the site borders, were notified of the proposal on 20th of February 2019.

Site notices were erected outside the development on the 20th of December 2018 and a press notice was published on the 29th of November 2018.

The proposal was advertised as a departure from policy on the basis that part of the site to be developed is designated as open space. This element of the site was once part of the Copland School playing field but was surfaced in Tarmac and segregated from the playing fields more than 10 years ago and has not been used for open space purposes for some time.

Following consultation, 4 letters of objection and 1 objecting petition containing signatories from 57 separate properties along London Road, Cecil Avenue and Rosemead Avenue were received.

In addition, a letter of support for the development was received from Elsley Primary School, a school situated nearby on the other side of the playing fields to which the site adjoins. The proposal was supported by the school with reference to the strong need for additional housing.

The objection comments received are summarised and responded to as follows:

Point of objection	Officer Response
London Road is already hemmed in by 3 developments at Ark Elvin Academy and along the high Road, negatively impacting the wellbeing of local residents.	<p>The sites along the High Road are within the Wembley Growth Area. This is the largest Growth Area in the borough where a significant proportion of the new homes and employment opportunities that are required will be provided. The potential impacts of this level of growth have been carefully considered through the plan making process.</p> <p>Furthermore, each application is considered on its planning merits and the potential impact of development is considered through the application process.</p>
<p>There is existing congestion in the local area.</p> <p>The development will generate car and foot traffic that the road cannot handle. Parking issues will also be worsened.</p>	<p>The development will not generate a high number of vehicle-borne trips and as such will not significantly alter current congestion levels. Please see paragraphs 93-132 for a discussion of the trip rates of the development.</p> <p>An acceptable but low level of car parking will be provided on site and the development will be parking permit exempt, meaning residents (aside from blue badge holders) will not have the right to apply for parking permits. As such, the potential for overspill parking from the development would be mitigated.</p>
The area has poor infrastructure to cope with new developments, such as schools and healthcare.	<p>Significant new infrastructure is being delivered in Wembley.</p> <p>Ark Elvin Academy is a larger local school that has recently undergone a capacity increase. It is also noted that a new primary school at York House and a new health centre in the Wembley Park area have been consented and will contribute to local infrastructure capacity.</p>
There is no investment in updating transport and road infrastructure alongside housing development.	<p>The increase in vehicular trips as a result of new developments is closely scrutinised by Brent and TfL. The development will result in insignificant increases in vehicle borne and local public transport trips, within existing road and public transport capacity. Further discussion is in paragraphs 93-132.</p>
The proposal goes against the Council's policy which protects designated open spaces.	<p>Whilst part of the site is within the peripheral part of the designated protected open space on Ark Elvin Academy's playing fields, the part of the site within the designated area is comprised of a large hard-surfaced car</p>

	<p>park and some areas of heavy tree cover.</p> <p>Officers do not consider that the site has the character or usability of conventional open space despite its designation as such. Officers therefore consider that the space could appropriately be developed for residential uses without materially detracting from the value of the playing fields open space designation.</p>
The development will negatively impact water quality, local wildlife and environment.	Minimising the development's impact on local ecology has been thoroughly considered by the applicant's ecologist, with a number of mitigation and enhancement measures identified that are to be secured by condition. Further discussion is in paragraphs 154-158.
The development will remove greenery, local wildlife, fresh air and open light sources currently benefitting the local streets. Overshadowing will be incurred.	The application includes studies confirming a suitable impact on surrounding properties in terms of overshadowing and light losses. There will be a loss of trees, however significant replacement planting is proposed, including a linear park environment for the use of the public. The current site has very little recreational value being comprised of overshadowed pathways to the community centre and a car park and officers consider that the offer in terms of green infrastructure represents an improvement on the existing site environment.
The development will create an unwelcoming environment and will create congregating spaces for anti-social behaviour, creating security concerns.	The development is lined by active building fronts which will make the area feel inviting and ensure the new environment's safety is maximised through natural surveillance.
The development is not a private development and will not contribute to the affluence of the area.	The fostering of mixed communities is of benefit to community cohesion and diversity.
The number of flats will dramatically change and diminish the local landscape.	The site is very large (just under a hectare) and the development accords with suggested density ranges in the London Plan's density matrix. It is not considered that the number of flats in the site. Sufficient car/cycle parking spaces are to be provided which will minimise the use of existing resources/infrastructure and impact on the local surroundings.
The new flats will enable overlooking of nearby gardens.	The development has been tested for unacceptable overlooking relationships in accordance with Brent's SPD1 guidance. The development does not create any unacceptable breaches of privacy between proposed or existing residential

	premises.
Regeneration should take place where it is not overcrowded already.	The area immediately surrounding the site is relatively low density but is close to a town centre and is considered to be an ideal site for development. The suitability of the site for development has been acknowledged in Brent's recent preferred options policy document (2018) where the site is designated as a site specific allocation for residential development.
Residents will experience disruption during building works and there is no statement as to how this would be managed.	Some temporary disruption associated with construction is an inevitable aspect of any development. A construction management plan will be conditioned to any forthcoming consent.
There are bottlenecks and congestion at the London Road/High Road junction which would be worsened.	The development will result in insignificant increases in vehicle borne and local public transport trips, within existing road and public transport capacity. Highways officers have paid due regard to existing congestion/traffic flows in reaching these views. Further discussion is in paragraphs 93-132.
Local pavements are unsafe and unable to take the extra footfall.	The development will provide new cul-de-sacs with pavements and will fund some highways improvements along London Road, including traffic calming.
Security concerns due to influx of temporary residents.	The Council has a responsibility to house vulnerable residents in temporary accommodation. The development has been designed to maximise safety and community cohesion, inclusive of public playgrounds and green spaces.
A community/youth centre and large children's playground would be a better use of the land, given the family focus of the area and proximity of primary schools.	Both a high quality community centre and public children's playground form part of the proposal and are strongly welcomed by officers.
Permitting the development would act as a precedent for the allotment site to be acquired and developed.	All applications are assessed on their own merits. The redevelopment of this site would not create a precedent for the redevelopment of the allotments.
The development will cast shadows on the neighbouring allotments, detrimental to the growth of food.	The allotment sites are some distance from the development site and it is noted that a modest impact on the immediately neighbouring buildings has been identified in the applicant's daylight/sunlight report. These modest impacts would see further attenuation when the more distant allotment sites are considered.
The plans appear to show the pathway off of London Road being cut off meaning the access to the allotments would be reduced.	The plans indicate that both pedestrian pathways spurring off from the end of the existing London Road would remain accessible with the proposed development in situ.

External Consultation

Externally the following were consulted:

The Greater London Authority

As part of the GLA Stage 1 response the following comments were raised:

- **Principle of development supported** – further information on how the community centre at least replicates the quality of the existing community centre provision is requested.
- **Residential provisions, which are 100% affordable, are supported** – further clarification on the precise nature of occupants' needs and the level of on-site service provision is needed in order to confirm the housing is consistent with the definition of affordable housing in the National Planning Policy Framework (NPPF)
- **Residential density supported** – subject to further clarification of qualitative urban design aspects
- **Children's play space supported** - given the near guidance compliant provision and proximity of public parks (e.g. King Edward VII park) On site play space for young children acceptable. Advised to consider off site contribution to update off-site play areas
- **Urban design and massing/appearance** – supported subject to confirmation that bedrooms cannot be used as through-routes/corridors within the adaptable temporary flats Recommended that ground floor units are duplex to overcome poor outlook and optimise quality of internal spaces. Tear drop site to be widened to allow for roof top garden. Lighting strategy to be conditioned to into lighting along route to the south of larger site.
- Further information relating to **energy and drainage** for full GLA consideration is requested

Some of the above comments have been addressed within the remarks section below whilst others will be addressed by the applicant ahead of a second referral of the application to the GLA.

Transport for London

Objections have been raised and to overcome these objections the following matters need to be resolved:

- TfL bus services in Wembley are in need of capacity increases, a financial contribution of £123,500 is therefore required towards the improvement of local bus capacity. This fee is commensurate with the level of impact the development would likely have on bus services. The applicants have agreed to this.
- Relevant contributions should be secured for issues identified in the applicant's PERS audit. This is agreed with Brent and is being secured in the form of wayfinding measures and traffic calming measures along London Road through a S106 obligation.
- Cycle parking should be increased to draft London Plan minimum standards as set out in policy T5 and the location of cycle parking should be reviewed. Brent have imposed a requirement for cycle parking to increase if the NAIL accommodation changes to general purpose accommodation in the future, so that appropriate cycle storage facilities can be provided. Brent consider that cycle parking meets adopted London Plan standards and would not require this aspect to be increase to draft standards. However any increase proposed by the applicant in meeting these would be welcomed.
- A Parking Design and Management Plan, Construction Logistics Plan and Travel Plan should all be secured by condition. Brent will impose conditions to secure all of these.
- Electric Vehicle Charging Points (EVCP) should be provided in line with draft London Plan standards. A condition will secure this.
- Future residents should be prevented from obtaining a car parking permit in the local CPZ. A S106 obligation will ensure this.
- A travel plan obligation should require accordance with TfL Travel Planning guidance. A S106 obligation will ensure this.

London Underground Limited - No objection subject to recommended condition and informatives

Network Rail – No objection subject to informatives.

The Environment Agency - No comments to make on this application

Canal and Rivers Trust – No comments to make on this application

Thames Water Utilities Ltd - No objections raised in relation to surface water drainage and foul water sewerage infrastructure. However, concerns regarding the need for upgrading of the local surface water

infrastructure. Recommended conditions and informatives.

Natural England – No objection to the proposal

Internal Consultation

Local Lead Flood Authority – The proposal falls within Flood Zone 1 which is considered to be low risk. The submitted details have been found to be satisfactory and no objections are raised.

Environmental Health – Comments as follows:

- Construction Management Plan needed.
- Assessment of internal noise levels needed, particularly due to railway proximity.
- Standard code of construction practices surrounding time limits on noisy works need to be observed.
- Details of any lighting should be submitted for review to ensure no nuisance to nearby residents.

Pre-application consultation undertaken by the applicant

The applicants held a public exhibition of the scheme in the nearby Ark Elvin Academy on Cecil Avenue on the 21st of November 2017. The applicant reports that the exhibition was well attended by local residents and that feedback forms were collected which led to the adaption of the scheme.

POLICY CONSIDERATIONS

The following planning policy documents and guidance are considered to be of relevance to the determination of the current application:

National Planning Policy Framework 2018

The London Plan 2016

Key policies include:

- 3.3 - Increasing Housing Supply
- 3.4 - Optimising housing potential
- 3.5 - Quality and Design of Housing Developments
- 3.6 - Children and young person's play and informal recreation facilities
- 3.8 - Housing Choice
- 3.11 - Affordable Housing Targets
- 5.2 - Minimising Carbon Dioxide emissions
- 5.12 - Flood Risk Management
- 5.13 - Sustainable Drainage
- 5.15 - Water Use and Supplies
- 6.3 - Assessing effects of development on transport capacity
- 6.9 - Cycling
- 6.10 - Walking
- 7.2 - An inclusive environment
- 7.5 - Public realm
- 7.15 - Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes

Draft London Plan

Key policies include:

- GG2 - Making the best use of land
- H1 - Increasing Housing Supply
- H5 - Delivering affordable housing
- H6 - Threshold approach to applications
- H12 - Housing size mix
- H13 - Build to Rent
- SI.5 - Water Infrastructure
- SI.12 - Flood risk management
- SI.13 - Sustainable drainage

D1 - London's form and characteristics
D2 - Delivering good design
D3 - Inclusive design
D4 - Housing quality and standards
D5 - Accessible housing
D6 - Optimising housing density
D13 - Noise
S4 - Play and Informal Recreation
T2 - Healthy Streets
T4 - Assessing and mitigating transport impacts
T6.1 - Residential Parking

Core Strategy (2010)

CP1: Spatial Development Strategy
CP2: Population and Housing Growth
CP6: Design & Density in Place Shaping
CP17: Protecting and enhancing the suburban character of Brent
CP18: Protection and enhancement of Open Space, Sports and Biodiversity
CP19: Brent Strategic Climate Change Mitigation and Adaptation Measures
CP21: A Balanced Housing Stock
CP23: Protection of existing and provision of new Community and Cultural facilities

Development Management Policies (2016)

DMP 1: Development Management General Policy
DMP 8: Open Space
DMP 9 A: Managing Flood Risk
DMP 9 B: On Site Water Management and Surface Water Attenuation
DMP 11: Forming an Access on to a Road
DMP 12: Parking
DMP 13: Movement of Goods and Materials
DMP 15: Affordable Housing
DMP 18: Dwelling Size and Residential Outbuildings
DMP 19: Residential Amenity Space

Local Plan – Preferred Options (2018)

Site Specific Allocation: BSWSA16 - Former Wembley Youth Centre/Dennis Jackson Centre, London Road, HA9 7EU

Supplementary Planning Guidance (SPG)

SPD1: Design Guide for New Development (2018)

Mayor's Affordable Housing and Viability SPG

Mayor's Housing SPG

Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG

DETAILED CONSIDERATIONS

Principle of Development

Residential use

1. The principle of residential development in this location, immediately adjacent to neighbouring residential uses to the west, is considered to be appropriate. It will contribute towards Brent's housing targets as set out within Brent's Core Strategy and the London Plan, with all of the new units being affordable and providing a range of accommodation types to meet the needs of Brent's population.
2. This scheme represents an excellent opportunity to provide good quality affordable accommodation to some of Brent's most vulnerable households, in a location well served by public transport and local amenities.

Loss of designated open space

3. Part of the development site (which currently forms a car park and a cluster of trees) forms part of a designated open space on the edge of the wider Ark Elvin playing fields. Policy DMP8 and Core Strategy Policy CP18 seeks to protect open space from development that does not enhance the open space. Brent officers do give significant weight to this designation.
4. Your officers note that, whilst a part of the application site is designated as open space (as a part of the Ark Elvin Playing Fields) within the current policy maps, it has not been used for this purpose for some time. It was hardsurfaced around 10 years ago and was fenced off from the playing fields. Trees are present around the edge of the parking area, but otherwise the site does not have the character or usability of conventional open space or playing fields despite its designation with the policy map as such. Officers therefore consider that the space could appropriately be developed for residential uses without materially detracting from the value of the playing fields open space designation.
5. Furthermore, within Brent's emerging Local Plan (which is at the Preferred Issues and Options stage), the site has been identified for redevelopment under allocation reference BSWSA16 for a mixed use development with residential and community uses.

Replacement community centre

6. Policy CP23 in Brent's Core Strategy 2010 seeks to protect existing community facilities.
7. This proposal will include a replacement community centre, located within the temporary accommodation within the southernmost block. The community centre will be at ground floor level, with a large, open plan 293sqm indoor space and a 168sqm private outdoor space with seating alongside the boundary with the playing fields. The community space is a necessary provision given the existing community centre use on site will be lost.
8. The replacement community centre will be 59% of the size of the existing centre (495sqm) in terms of indoor space and 93% of the size of the existing centre when the private outdoor space is included. The existing facilities on site are old, and the complex and fragmented layout of the building offers limited uses to the local and wider community of Brent. Furthermore, the existing community centre does not offer step free access. Although a reduction in overall floor area, the proposed facilities provide greater flexibility of use and could be separated into smaller spaces, appropriate for differing uses, and also differing uses at the same time.

Residential Provisions

9. The new development will provide three specific categories of housing, for which there is a severe shortage. The scheme is 100% affordable. Each type of accommodation is discussed below:

New Accommodation for Independent Living (NAIL) - located in Block A

10. This will be 25 small self-contained flats (17 x studio flats and 8 x one bedroom flats) specifically designed for adults to enable them to live an independent life, with a degree of 24 hour support on hand. The council's NAIL programme provides an opportunity for independent Living for people who might otherwise be housed in unsuitable and costly care home accommodation. Independent living will help maintain residents health, wellbeing and independence in an affordable home of their own.

General Need Affordable Rent Units - located in Block B

11. The general needs accommodation provides much needed council owned, permanent affordable housing in the borough in an attractive residential setting. All homes have level access, and a number are specifically designed for wheelchair users.
12. The West London Alliance Strategic Housing Market Assessment (SHMA) produced in August 2018 concluded that there are 12,200 households currently in affordable housing need in Brent who are unable to afford their own housing. The London road scheme contributes to Brent's goal of Building a Better Brent.
13. The mix of units within the affordable rent include 10 x one-bedroom units, 61 x two- bedroom units and 21 x three-bedroom units.

Temporary Accommodation - located in Block C

14. The temporary accommodation provides much needed purpose built emergency accommodation for homeless families, for whom Brent has a statutory duty to house. Without this, such families would have to be found unsuitable bed and breakfast accommodation, sometimes outside the borough, resulting in Children having to change schools at a time of crisis.
15. The London road temporary accommodation will provide a stable and settled environment for households and individuals. Residents will stay until more suitable permanent accommodation in the borough can be found. Typically, a resident may stay for up to a year, but this will be determined by individual circumstances and availability of suitable accommodation. Currently there are 2,348 homeless households in temporary accommodation.
16. The table below illustrates the average waiting time for households in TA, who are in priority band C:

Size	Average Waiting Time - Band C
2 Bed	9 Years
3 Bed	16 Years
4 Bed	18 Years

17. The Scheme will enable substantial savings to be made on Brent's revenue budgets together with providing the most deprived families and individuals in the borough with suitable high quality accommodation.
18. The mix of units within the temporary accommodation includes 31 x one bedroom/ two bedroom adaptable units and 21 x two bedroom/ three bedroom adaptable units.
19. Policy CP21 of Brent's Core Strategy 2010 sets a borough wide target of 25% of new homes to be family sized (three bedrooms or more). Both the NAIL and temporary accommodation are for specific groups whose occupants' needs are understood by the Council. As such, there is a robust justification for the absence of 3-bedroom homes within these tenures as this mix is required to meet housing need. When excluding the bespoke tenures of NAIL accommodation and temporary accommodation, the general purpose housing (for Affordable Rent) is formed of 23% 3 bedroom units, which sits close to the policy target. The temporary accommodation is designed with flexible and adaptable flat layouts which allow the 1 bedroom flats to be made into 2 bedroom flats and the 2 bedroom flats to be made into 3 bedroom flats as needed. The flexible demand of temporary occupants is acknowledged and this approach to the design is welcomed.
20. The proposal is to provide 100% affordable housing, split across 3 affordable tenures, specific to the Council's needs. The affordable housing offer does not include intermediate housing, however officers do appreciate that the housing mix is Council led and responds to the specific needs of the Council's tenants. Whilst no intermediate affordable housing is provided, officers consider that the 100% provision of affordable housing more than meets the requirements of policy DMP15 and no scrutiny of scheme viability is justified in supporting the proposal.
21. The approach of splitting the three proposed tenures across different buildings is logical and such self-containment is understood to routinely be expected by providers as it makes for simpler management arrangements. Brent's SPD1 policy seeks to ensure that all residential entrances, regardless of the tenures they serve, appear equally prominent and of a similar design quality so as to avoid the creation of perceived 'poor doors'. All building are to be completed to a similar design quality and with connected simple brick facades. The proposals assure officers that all buildings would appear of similar quality and the development would be largely tenure blind.

Design and Appearance

Site Layout

22. The development is proposed to be based around two new culs-de-sac which would spur off of the existing cul-de-sac at the end of London Road. The Council would seek to adopt these new culs-de-sac once built. One cul-de-sac would form a continuation of London Road, serving the general purpose affordable rented accommodation (in Block B) and the temporary accommodation/community centre (Block C) and the other would spur off from the continued London Road to the north and would serve the

NAIL accommodation (Block A) and the general purpose affordable rented accommodation (in Block B).

23. The applicant would seek to provide off-street parking along the cul-de-sacs and also proposes to activate the highway frontages with individual front doors to ground floor units.

Scale and External Appearance

NAIL accommodation (Block A)

24. Block A (NAIL) is a rectilinear building which has been designed to emphasise its simple cube-like form. The building is formed of 4 storeys with a flat roof, located at the north of the site. The building will be externally clad in a pale yellowish brick and animated through clean vertically aligned stacks of windows which are framed in dark grey aluminium. To provide some additional contrast, the same dark grey aluminium is to be placed sparingly in thin vertical strips between some window stacks. Square sections of the façade, surrounding each window, will be recessed in from the main façade and across the top part of the uppermost square recess, a strip of brick headers is to be placed which will provide a good level of animation, which does not override the simple and clean appearance of the building. The residential entrance is to be emphasised through the use of a projecting canopy feature above the entrance.

Affordable rent (Block B)

25. The general purpose affordable rented accommodation (Block B) is located in a broadly circular block with a podium garden in the centre, located in the middle of the site. The block is half formed of a terrace of part 2 and part 3 storey town houses (the parts closest to the existing residential properties) and half formed of a part 6 and part 7 storey apartment block (the parts away from the existing residential context and close to the playing field edges). The variety of scale across the site allows for an appropriate transition in scale from traditional suburban housing on London Road, and is considered acceptable for the site context.
26. The town houses are to be three storeys in height with jagged roof planes which gives them a playful appearance. Each three storey massing is to be separated by two storey elements atop which roof terraces are provided. Each adjacent house is to be formed of a different facing brick colour, with pale red, yellow and white bricks being used on alternate houses. The houses will have wide active frontages at ground floor level and thin vertical window stacks on the upper floors within a recessed box, topped by a row of brick headers.
27. The apartment block element will be formed of a main massing of six storeys and a set in seventh storey at the top. A predominantly pale yellow brick will be used as the key façade material, and this will be offset through the dark grey aluminium used in Block A, across the window frames and vertical strips. The smaller seventh storey will be formed of a predominantly black/grey brick for contrast. The same framing technique through recessed boxes around windows, as well as some gaps between windows, as described for Block A is to be used on this block. Additional animation will be established through aluminium projecting balconies with patterned balustrades. A final feature is the use of a white coloured GRC band around the building at the fifth storey, which visually separates the top half of the building from the bottom half.

Temporary accommodation and community centre (Block C)

28. The temporary accommodation and community centre (Block C) is located to the south of the site in a part 6 and part 4 storey L-shaped building to the south of the site. It has a simple block like form, with a cubic emphasis, similar to Block A. The building is to be formed of a light coloured brick for the six storey element and a darker brick for the four storey element. The development will utilise similar architectural details to the other blocks, with floor to ceiling windows framed in dark aluminium, framing through square sections of recessed brick, a row of brick headers to the top of the building and strong active frontages at the ground floor.

Density

29. The assessment of any development must acknowledge the NPPF and the London Plan, which encourage greater flexibility in the application of policies to promote higher densities. Policy 3.4 of the London Plan encourages the development of land to optimise housing potential but recognises this must be appropriate for the location taking into account local context, character, design and public transport capacity.

30. London Plan Policy 3.4 includes a methodology for calculating an appropriate density, relative to the character of the setting, proximity to town centres and local public transport accessibility. The site has a size of 0.947 hectares and the proposal is for 170 units with 2.78 habitable rooms per unit. In accordance with the Mayor's density matrix, the application proposes development density of 498 habitable rooms per hectare and 180 residential units per hectare. The setting of the site would most appropriately be described as 'urban' in accordance with the character setting descriptions set out in LP Policy 3.4, as a result of the local buildings being formed of terraced housing and due to the location being within close walking distance of a major Brent town centre. The density matrix indicates that optimum density for a proposal in an urban setting with a PTAL of 2-3, and which proposes an average of 2.78 habitable rooms per hectare, would be for between 70 and 170 units per hectare and 200 - 450 habitable rooms per hectare. This proposal is for 180 units per hectare and 498 habitable rooms per hectare and therefore only sits marginally above the suggested density range for this site.
31. Notwithstanding the above, in line with the policies of the emerging London Plan, consideration must also be given to the design and quality of accommodation to be provided, the siting and scale of the development, its relationship to site boundaries and adjoining properties, the level and quality of amenity space to support the development, and any highways matters. These are considered below.

Amenity

32. The impact on neighbours is a material consideration, and policy DMP1 seeks to ensure that this is acceptable. It will be necessary for the application to demonstrate that the development meets all standards within Brent's SPD1 guidance for new developments in respect of their impact on the nearest existing residential units and the other proposed residential blocks within the development.
33. The context of the site sees residential uses to the west, formed of terraced dwellings lining London Road and Cecil Avenue. The most sensitively positioned existing property is an unnumbered dwellinghouse named 'The Cottage', which sits at the end of London Road and is immediately bordered by the development site on both its eastern and northern edges.

Privacy

34. The amenity impact considerations within SPD1 require that all primary habitable room windows within the property are at least 9m from the boundary with another private property, except where the view on to that property would be to a part of the property which would serve as low value amenity space (e.g. the side access around a house). All secondary habitable room windows and non-habitable room windows should be obscure glazed if they cannot achieve this standard too. Furthermore, the proposed habitable room windows should achieve a full 18m of separation from the habitable room windows of other properties (apart from street facing windows). These standards are in the interests of protecting the privacy of neighbouring occupiers.
35. The proposed development achieves this standard in all instances when this rule is tested against the neighbouring properties along London Road and Cecil Road, including 'The Cottage'. There are no windows within the flank wall of Block A that face onto 'The Cottage' site.

Outlook

36. In the interests of protecting existing properties from being unduly enclosed and losing exposure to daylight, all buildings proposed should sit underneath a 45 degree line drawn from a 2m height at the nearest edge of private rear garden amenity space. The proposed buildings should also sit underneath a 30 degree line drawn from a 2m height at the nearest rear habitable room windows within neighbouring properties. The proposed development achieves this standard in all but one instance. The four storey part of Block C sits 6.7m from the splayed boundary to the rear garden of 174 London Road and, in this small area of the rear garden, the proposed building will be large enough and close enough to result in a test of the 45 degree line being failed to a relatively minor extent. Officers acknowledge this shortfall of guidance as a negative but also note that this is the only instance where the amenity impact guidelines are breached. Officers would also note that the area where the breach would be experienced is a peripheral section of a large residential garden, and that the part of the garden close to the dwellinghouse would remain within guidance parameters when tested for impact.
37. On balance, given the significant benefits of the development in terms of housing delivery, in particular affordable housing, officers consider that the development should be supported despite a small breach of SPD1 guidance for amenity impact being present.

Daylight and Sunlight

38. The applicant has submitted a Daylight, Sunlight and Overshadowing Report. The analysis indicates that there will not be a significant impact on surrounding properties as a result of the development.
39. The closest sensitive properties to the proposal site were highlighted as being potentially affected by the development. These buildings are the closest dwellings to the site, those being 159 London Road and 174-176 London Road (evens only) and an unnumbered detached dwellinghouse named 'The Cottage', which sits immediately to the west of the site. The results of testing on each of these properties is reported below.

159 London Road

40. 4 windows on the south façade of this property were analysed for daylight and sunlight impacts.
41. The first test carried out assessed the Vertical Sky Component (VSC) from each affected window. The VSC analysis, in broad terms, compares how much of the sky is visible at present and how much of the sky would be visible with the new development being present. This is expressed in percentage terms. The tests are taken from the centre of windows tested. The BRE guidance considers windows whose VSC value remains above 27% to retain good levels of daylight.
42. The analysis shows that all windows tested passed the VSC test of 27% or were unaffected by the proposal. As such the proposal would not result in any undue impact in terms of loss of light or overshadowing.
43. These same windows were also assessed under the Probable Sunlight Hours (PSH) criteria. This test considers what sunlight is likely to reach windows across both a full year and during winter. All windows analysed experience good values and therefore meet the criteria with the proposed development in place, during both winter and annual scenarios (Annual: 25% and Winter: 5%).
44. The garden space of this property was tested for potential detrimental overshadowing effects. A minimum of 2 hours of sun on at least 50% of the garden during the spring equinox (21st March) has been confirmed through the applicant's modelling. The development therefore meets the relevant BRE overshadowing guidance.

174 & 176 London Road

45. 10 windows of this property were analysed for daylight and sunlight impacts, 8 being on the north-east elevation and 2 on the south-east elevation.
46. All windows analysed experience VSC values in excess of the threshold recommended by the BRE guide with the proposed development in place.
47. In terms of sunlight, these windows all met the relevant probable sunlight hours criteria for both annual and winter scenarios.
48. The garden space of these properties was tested for potential detrimental overshadowing effects. A minimum of 2 hours of sun on at least 50% of the gardens during the spring equinox (21st March) has been confirmed through the applicant's modelling. The development therefore meets the relevant BRE overshadowing guidance.

'The Cottage'

49. 5 windows on this property were analysed for daylight impacts on the south-east façade, 2 on the first floor and 3 on the ground floor. With the proposed development in situ, the upper floor windows all experience VSC values that meet BRE criteria, however the 3 ground floor windows experience VSC values below the recommended threshold. Nonetheless, the ratio of impact tests undertaken on these windows showed that the difference between the base case and the proposed scenario is minimal, with values in the range of a 30-39%% reduction, which is only slightly more than the BRE acceptable reduction of 20%.
50. A second test of NSL (no sky line) was also undertaken which assessed the percentage of a room from

which the sky can be seen out of the window. The applicants undertook NSL testing based on an indicative floor plan of the property, with results confirming that all rooms meet BRE targets, achieving the same levels of daylight distribution with the proposed development in place.

51. These same windows were also tested in terms of sunlight impact. The appropriate probable sunlight hour targets are achieved in both the annual and winter scenarios.
52. The garden space of this property was tested for potential detrimental overshadowing effects. A minimum of 2 hours of sun on at least 50% of the garden during the spring equinox (21st March) has been confirmed through the applicant's modelling, with the proposed development in situ. The development therefore meets the relevant BRE overshadowing guidance.

Summary

53. The applicant's modelling indicates that the development will have an acceptable impact on all nearby residential properties with regard to daylight, sunlight and overshadowing, as measured through the established BRE criteria.
54. Officers welcome the very limited impact of the development in the context of the surroundings, especially given the significant benefits being delivered, and support the application on the grounds of daylight/sunlight/overshadowing impact.

Quality of Accommodation

Layout and Outlook

55. The proposed units are considered to be of a high quality and all meet the minimum space standards as set out in policy 3.5 of the London Plan. All of the ground floor units have suitable defensible spaces in front of their windows, established through planting as shown on the applicant's landscaping plan.

NAIL accommodation (Block A)

56. Within Block A, the NAIL accommodation is provided within a single core building. The building's main entrance is off of the newly created cul-de-sac on the east side of the building. Nearly half of the ground floor is to be allocated as ancillary rooms, including a lobby, office and communal club room and kitchen for the use of the residents and their carers. A bin store (fronting the street) is located adjacent to the entrance lobby and a bicycle store is located centrally in the building.
57. The remaining part of the ground floor provides four residential units. Above the ground floor, three floors of seven residential units each are provided. Smaller communal lounges are also located on the first and second floors on the south side of the building. All of the flats in this block are 1b1p flats / studios which reflects the nature of NAIL accommodation where individuals who have care requirements are able to live independently but with onsite assistance.
58. The flats all meet London Plan space standards for studios (37sqm) and some are significantly in exceedance of the standards (circa 50sqm).
59. Outlook from the flats in Block A would be to three elevations, with some flats facing north-west and north-east over the block's garden space and some flats facing south-east towards the newly formed highway which the block will front. The outlook provided from these three elevations will provide an excellent outlook for upper floor flats and a good outlook for ground floor flats, where the distance from the windows to the boundary fences would range between 6.5m and 22m.
60. Windows in the north-east elevation would directly face a wall of Block B, with each block being separated by an 18m gap for retention of good outlook and protection of privacy between the flats in each block. Eight of the twenty five flats (32%) in this block would have a dual aspect outlook, with those flats benefitting from placement within corners of the building.

General Affordable rent - Block B

61. Block B is the largest block and provides general purpose affordable accommodation. The western part of the building is set out in an L-form terrace of eight townhouses, each providing 3 double bedrooms and a private roof terrace. The townhouses front both arms of the extended London Road.

62. Unlike the two other blocks, Block B provides direct access to its ground floor units from the street, which helps the block to integrate with the existing character of London Road. This layout means that the ground floor environment is largely composed of front garden spaces between the new highways and the building itself. The street level front doors should foster a healthy environment and improve street activity around the highway fronting sides of the building.
63. The eastern side of the building fronts a proposed linear park which is designed to separate Block B from the playing fields. Aside from the individual dwelling entrances, two main residential core entrances are provided for entrance to the flats, one from each of the extended arms of London Road. Each main core entrance is placed adjacent to a bin store which is accessed from the road for ease of collection. The bin stores are to contain a door and window to each to ensure that the activeness of the frontage is retained. The only other aspect to the frontage is the vehicular access to the ground floor car park, which is close to the point where both new arms of London Road converge. The ground floor is also equipped with plant rooms and cycle stores as well as two stair/lift cores enabling access to the upper floors.
64. Block B's upper floors are formed of entirely residential accommodation, with the exception of the first floor which includes a large podium garden space atop the ground floor car park. The podium is large enough that all habitable room windows will enjoy at least 9m of open outlook before being obstructed by other parts of the building, as required within Brent's SPD1 guidance. There will also be no directly facing windows closer than to each other than 18m, as required within Brent's SDP1 guidance. Above second floor level, the western arm of the block (formed of the townhouses) is no longer present due to its lower massing and the block is then only formed of the more prominent eastern part of the building.
65. The upper floor accommodation within Block B is formed around two cores, one of which provides access to nine flats per floors (eight flats on the sixth floor) and one of which provides access to four flats per floor. The number of flats served by core one exceeds guidance within the Mayor's Housing SPG which generally seeks flatted development to not exceed eight units per core per floor. In their response, the GLA do not object to the arrangement of flats per core as proposed, and Brent officers note that the corridors to flats are wide and provided with windows close to the lift/stairwell access points on each floor, resulting in a high quality internal environment.
66. All of the units in Block B have a good means of outlook, which, in the case of the townhouses, is over the front garden spaces and newly proposed highways, and, in the case of the flats, is over the central podium garden (for east facing flats) or over the new linear park and Ark Elvin Academy playing fields (for west facing flats).
67. There are three dual aspect flats per floor between the ground and 2nd floors and five dual aspect flats per floor between the 3rd and 6th floors. With the exception of the townhouse at the corner of the two new highways to be created, all the other townhouses are to have a single aspect facing towards their respective highway. Overall, the layout in Block B results in 30 (32%) out of its 92 residential units having a dual aspect outlook, although none of the single aspect flats have a direct north facing outlook so will therefore benefit from some direct sunlight.

Temporary accommodation - Block C

68. Block C will provide temporary accommodation for Brent's housing services as well as a 295sqm community centre on the ground floor. The block will be accessed from the southernmost of the newly created highways and will see a prominent main residential entrance and community centre entrances provided fronting the highway. As with the other main residential core entrances, a street fronting bin store is to be placed adjacent to the entrance. The ground floor contains an office, lobby, bin store, the community centre, as well as six of the temporary units. The remainder of the elevations at ground floor level are to be active, formed of windows serving the accommodation and the community centre.
69. The upper floors are exclusively residential, serving eleven flats per floor from its single core, reducing to seven flats per floor on the fourth and fifth floors. In their response, the GLA do not object to the arrangement of flats per core as proposed and Brent officers note that the corridors to flats are wide and provided with windows close to the lift/stairwell access points on each floor, resulting in a high quality internal environment. Eight units per floor are dual aspect, which reduces to five units on the ground floor and four units on the fourth and fifth floors. Overall, 37 (70%) out of the 53 flats have dual aspect outlook. A communal rear garden is provided to the rear of the block which includes a large external bicycle store.

70. Whilst the flats will meet minimum space standards, the flat layouts within the temporary tenure have been shown as adaptable which could enable the one bedroom flats to be used as two bedroom flats and two bedroom flats to be used as three bedroom flats with reduced living room space, depending on the needs of residents. The larger adapted forms of these flats would not meet minimum space standards, however given that the flats will be used for shorter, temporary periods of residence and would respond to a bespoke requirement of the Council's housing service, officers do not consider that the proposal should be resisted because of this.

Daylight & Sunlight

71. The development is relatively low-rise and situated in a site with an open character which is surrounded by two storey development on one side and open space on the other. As a result, officers consider likely that good levels of daylight and sunlight would be experienced by residents in the new development. In order to quantitatively confirm this, the applicant has included an assessment of the daylight and sunlight levels that would be experienced at the proposed flats, as measured in accordance with BRE criteria.
72. The testing considered that Block B (affordable rent) would experience the worst daylight and sunlight as a result of its podium courtyard and double flanked unit layout. The worst affected units within this building formed the basis of the testing for compliance. Therefore, 3 units in block B, representing the worst case scenarios, were tested for daylight and sunlight, these being a corner unit (B-01-16), a typical middle unit facing the NW orientation (B-01-22) and a top floor unit (B-06-73). Of these tested units, only the middle unit's living room space on the first floor fell short of BRE criteria, as the Average Daylight Factor (ADF) testing returned a value of less than 1.5 and the Probable Sunlight Hours (PSH) testing returned values of less than 25% annually and less than 5% in winter. The assessor notes that this shortfall in BRE compliance is mainly due to the presence of balcony overhang in front of the windows. As balconies provide the required amenity, it is considered an acceptable shortfall, especially since the values are very close to the BRE targets at 1st floor level and that the daylight performance is likely to improve and meet the BRE targets on the higher levels. All other tested flats' habitable rooms met the relevant criteria.
73. Block B's central podium amenity space was tested against the BRE overshadowing criteria. The criteria require at least 50% of an open space to receive 2 hours or more of sunlight on the spring equinox (21st March). The testing found that 75% of the podium space received at least 2 hours of sunlight on this date and the test is therefore comfortably passed.
74. As mentioned above, these tested spaces represent the worst case scenarios across the development, and, given the positive results, blocks A and C did not require testing.

Overheating

75. An overheating study has been included with the application. The study considers any potential residential discomfort that could be experienced through excessive solar gains that would lead to overheating. The study concludes that, with a standard fit out, which includes low emissivity windows and mechanical ventilation with heat recovery, 98.8% of rooms in the development would meet the relevant overheating criteria (CIBSE TM 59) under current climate conditions and 94.7% of rooms in the development would meet the relevant overheating criteria under projected future climate conditions.
76. Having identified the above shortfalls, the applicants have proposed internal blinds for top floor dwellings which result in the same tests yielding 100% and 99.8% results respectively. Only one room fails, which is a south facing living room on the top floor of block B (B.05.76). The assessor notes that the installation of a balcony shading parapet could substantially reduce the solar gains to this room and ensure a pass under the future scenario.
77. The mitigation measures identified in the report will be secured by condition.

Accessibility

78. London Plan Policy 3.8 requires 90% of new housing to meet Building Regulation requirement M4 (2) "accessible and adaptable dwellings". It also requires 10% of new housing to meet the Building Regulation requirement M4(3) "wheelchair user dwellings".
79. More than 10% of units provided are wheelchair adaptable in accordance with policy. This includes all 25 units in Block A (NAIL), 12 units within Block B and 4 units in Block C which amounts to a 100% provision

of wheelchair accessible units in Block A, a 13% provision of wheelchair accessible units in Block B, a 7.5% provision of wheelchair units in Block C and a 24% provision of wheelchair accessible units across the whole scheme.

Amenity Space and Play Space

Public spaces

80. A key amenity space/landscaping feature of the development is a proposed linear park, situated along the western edge of the development site which would act as a green buffer between the development and the playing fields. The linear park would have a focal point entrance between blocks B and C, comprised of a public space at the end of the extended London Road incorporating a publically accessible young children's play area, the access to the community centre and temporary accommodation and communal seating. The linear park would be situated between the western edge of the site and the western elevation of Block B and would be comprised of seating, landscaped areas and play apparatus for children. Five of the ground floor flats to Block B would have direct access to the linear park space from private patios serving each of the flats which front the space.

Communal spaces

81. Block A (NAIL) will be surrounded by a communal 850sqm garden space (34sqm per flat) with seating and planting that will be accessible directly from the ground floor lounge space for residents of the NAIL accommodation.
82. Block B is provided with a central podium communal space which is 664sqm in size (7sqm per flat), which includes a combination of play spaces and general amenity spaces and will be naturally surveyed from the flats which overlook this space. The first floor flats will directly adjoin this space and the plans confirm that suitable defensible spaces will be established through planting between the windows/patios of the flats and the communal garden space.
83. Block C is to have a communal rear garden of 443sqm for the use of residents in temporary accommodation. This will include play space and open spaces and will be naturally surveyed by the flats in the block. It should be noted that 54sqm of this space is formed of a cycle store and the communal space therefore includes 389sqm of usable amenity space (7sqm per flat).

Private spaces

84. In terms of private amenity spaces for individual residents, Block B (affordable rented) will include private patios or balconies for all flats as well as roof terraces for each townhouse and the sixth floor flats. The private balconies/patios range in size from 5.1sqm per flat to 17sqm per flat depending on the unit. The total quantum of private space across block B is 889sqm. When the communal amenity space at first floor level (664sqm) is apportioned between the flats in the block, the development provides an average of 16.9sqm of amenity space per flat which is close to Brent's SPD1 guidance target of 20sqm per flat and is in full exceedance of the London Plan requirements for 5sqm amenity spaces per flat with small increases in size as occupancy increases.
85. The amenity space offer is also substantially improved when it is considered that the proposed linear park would be located immediately to the west of the block and would even be directly accessible from five of the ground floor flats' patio spaces.
86. The sixth floor flats' roof terraces are shown as being shared between sets of two, three or four flats. This is acceptable in principle, however the relatively narrow depth of the terraces and the lack of defensible space in front of the windows looking onto the terrace spaces would result in unacceptable breaches of privacy when residents from the different flats use the terraces. Because of this a condition will require the sixth floor roof terraces to be subdivided and for details of the subdivisions to be submitted and approved before occupation.
87. The development is not providing private amenity spaces for individual units within block A (NAIL) and block C (Temporary) but will be providing access to communal garden spaces for the exclusive use of residents of each block and will also allow nearby access to the linear park at the side of block B. This mirrors another recent Council-led residential development at Knowles House in Harlesden for 92 temporary accommodation units where both officers and committee members accepted the provision of accommodation without balconies on the basis that the development provided accommodation to the

bespoke needs of the Council (planning reference: 17/2516). Officers would emphasise the good quality communal garden space as well as the immediate proximity to the public linear park and play spaces in justifying the same arrangement for the NAIL and temporary accommodation within this development.

Play spaces

88. Despite proximity to the adjoining Ark Elvin playing fields, the local area has deficiency of play facilities and this proposal would provide a substantial amount of both public and private play spaces for local and prospective residents. GLA guidance seeks a quantum of play space in accordance with the likely child yield of the development, as calculated through the number/size of units and their proposed tenure. Whilst the NAIL accommodation would specifically cater to adults, the affordable rented accommodation and temporary accommodation would likely yield a significant number of children within the development. In the context of this development, a provision of 1,320sqm of play space would be expected.
89. In response to the GLA play space requirements, a public under 5's play space (100sqm) is to be provided within the public realm immediately outside the entrance to the temporary accommodation and the community centre whilst a private under 5's play space (100sqm) is to be provided within the temporary block's rear garden space. Another private under 5's play space (460sqm) is to be provided within the podium garden of block B. Finally, a play space geared towards 5 – 11 year old children will be provided publically within the linear park to a quantum of 540sqm. The total quantum of play space is 1,200sqm with about half being private and half being public. The applicant's landscaping strategy indicates detailed proposals for these play spaces, with developed designs for various different types of play, enabled through different apparatus, being indicated on the plans.
90. The provision of play space, particularly publically usable play space, is strongly welcomed in this location.
91. The GLA have picked up on the slight shortfall of the scheme's play space (120sqm) compared to the target child yield figure of 1,320sqm. The GLA does consider that the proximity of nearby parks (e.g. King Edward VII) suitably mitigates this shortfall and would provide a good local recreation space for older children (12+).
92. Furthermore, the redevelopment of Ark Elvin Academy (LPA Ref: 15/3161) secured a Community Access Plan which included community access to for a minimum of 30 hours per week. Community access is proposed to the sporting facilities within the new school including the indoor sports hall and two activity studios, together with the external MUGA (multi use games area) and AWP (all weather pitch).

Transport

The site is located within PTAL 3 and there is a CPZ operating within the area.

Car parking

93. As the site does not have good access to public transport services, the higher residential car parking allowance set out in Appendix 1 of the adopted DMP 2016 applies. The 170 proposed residential units (67 x 1-bed, 82 x 2-bed & 21 x 3-bed) are allowed up to 174 car parking spaces, with some further parking allowed for the community hall. The proposed provision of 42 car parking spaces in total is therefore well within the maximum allowance.
94. Three types of parking are proposed. Firstly, an undercroft car park with 20 spaces (incl. six disabled) is proposed within Block B for those 84 flats. Secondly, each of the eight proposed houses in that block will also have their own off-street parking space within its front garden. As all of these spaces will be off-street, they will be privately managed.
95. Finally, a further 14 disabled spaces are proposed on-street alongside the new access road, laid out perpendicular to the carriageway. These will come within the same control as the street, so if the new roads are adopted as proposed, they will become subject to CPZ restrictions as an extension to Zone "C".
96. Disabled Blue Badge holders would be able to obtain permits to use these bays. the overall total of 20 disabled parking spaces would be sufficient to ensure an allocated bay can be provided for each wheelchair unit, with some surplus for the community hall if required.
97. Policy DMP12 requires that any overspill parking from development can be safely accommodated

on-street. All units are proposed for affordable housing and as a general rule, affordable housing is assumed to generate parking at 50% of the maximum allowance. This would give an estimated demand for about 87 parking spaces, creating an overspill of about 45 cars.

98. Although London Road is not noted as being heavily parked at night, it does not have sufficient spare parking capacity to accommodate the predicted level of overspill parking. The site is within walking distance of two stations and Wembley town centre, and there is a CPZ in operation in the area, so any 'permit-free' agreement can be readily enforced. It is therefore recommended that the right of future residents of this development (aside from disabled Blue Badge holders) to on-street parking permits be withdrawn through a planning condition. A condition is also recommended for a car park management plan to be secured.
99. Of the 20 off-street spaces proposed in the parking court, at least eight will need to have electric vehicle charging points (four active & four passive) and a condition is recommended to this end. The layout of all of the parking spaces meets standard dimensions. The headroom of the undercroft area is shown at 2.2m, which is fine for standard parking spaces but not for high-top conversion vehicles for wheelchair users. However, plenty of alternative disabled parking spaces are proposed along the streets that such vehicles can use. The car park access is also proposed at 4.8m width, which is fine subject to the inclusion of 300mm margins on either side to protect the structure of the building.

Cycle parking

100. The London Plan requires at least one secure bicycle parking space per 1-bed flat and two for larger flats, plus one space per 40 flats for visitors. For the general and temporary housing units, three shared cycle stores with a total capacity of 234 bikes on double height racks are proposed. The houses will each have a bicycle store for two bikes, whilst the NAIL accommodation will have its own separate buggy/bicycle store. These various secure stores meet the long-term storage requirements for the residential accommodation.
101. TfL have raised concerns with the lack of cycle parking for the NAIL accommodation. In response the applicant has advised that the current facilities for cycles and/or buggies is appropriate for NAIL accommodation and guidance has been sought from the relevant housing management team/client at Brent Council. However, should the building become more 'general purpose accommodation' in the future further provision could be provided within the secure courtyard provided for this block. This would be covered within the Travel Plan for the site.
102. The community hall also requires 5-6 spaces and a total of 13 'Sheffield' stands are proposed alongside the access road to meet this requirement plus the short-term requirement for the flats.

Refuse and fire access

103. Bin stores for the three blocks are all proposed along the outside edges of the buildings, allowing easy access for refuse vehicles from the proposed new roads. The storerooms are shown with sufficient capacity to meet Brent's waste and recycling storage guidelines. The site layout also allows easy access for fire appliances to all building entrances.

Servicing

104. The applicant has estimated that the development would receive in the order of 19-24 deliveries per day (largely vans), which could be comfortably accommodated on-site.
105. Nevertheless, a Delivery & Servicing Plan has been submitted to help to manage the number and timing of deliveries, particularly to avoid peak hours and to monitor and review this over time.

Access road and footpath layout

106. The proposed design of the access roads show sufficient width (minimum 5m) for two-way movement of cars and service vehicles, but some of the footways fall below the standard expected width of 2m.
107. To create a better balance between vehicular and pedestrian space for this pedestrian-focused development, the carriageway widths can be reduced wherever this occurs in order to retain a minimum 2m footway width. Locations where amendments are sought include opposite the undercroft car park access (a slightly realigned 4.1m-4.8m road would be possible) and along the front of Block C, where removal of the visitors parking space shown (without a Blue Badge symbol) would address the issue. In

addition, the proposed substation close to the site entrance obstructs pedestrian access alongside the access road. This substation should therefore be set back further from the access road, not just to improve pedestrian access, but to also ensure visibility is not obscured from the adjoining parking space. If this is not possible, then a footway could be provided in front of the substation, thus narrowing the carriageway to provide a 'pinch-point' – this will also require a disabled parking bay to be relocated.

108. Highways officers have indicated that they would be comfortable with these amendments (footway/carriageway widths and substation siting) being secured by condition to any forthcoming consent.
109. The provision of a pedestrian link to the existing footpath/cyclepath at the western end of Block C is welcomed by highways officers. They have advised that it would also be desirable to provide a pedestrian/cyclist link to the adjoining footpath in the vicinity of Block A (NAIL) to shorten the walking distance to Wembley Park & Wembley Stadium station. In response, your officers can advise that PROW 87 was diverted as part of the Ark Elvin School expansion. The element of the PROW that was diverted was widened to 3.4m to allow for shared use with cyclists. However, the PROW alongside Block A did not form part of the re-routed section and remains as existing.
110. The layout of the roads provides a natural turning point at the junction of the new roads. It is also proposed to provide more informal turning facilities at the end of each length of cul-de-sac, in the form of a contrasting coloured shared surface area. Tracking diagrams have been provided to demonstrate that these can accommodate 10m refuse vehicles. This is welcomed and can be considered for adoption too. The contrasting material will then be continued around the rear of Block B to provide a linear park/playspace.
111. The amended access arrangements will require alterations to the existing kerblines at the end of London Road to suit the new road layout and the formation of an entry table at the entrance to the site. The latter needs to ensure it spans the width of the footpath/cyclepath from Tokyngton Avenue to provide a level crossing surface for pedestrians and cyclists across the entry junction.
112. Works within the public highway and to provide the new access roads to adoptable standard will be secured as a condition to any forthcoming consent.

Transport Impact

113. Estimated future trips to and from the residential accommodation were based upon comparisons with seven other "private" housing blocks of flats within outer London. However, this is not considered to be the most appropriate comparison and Brent's officers consider that the assessment should have been based on "local authority/affordable" housing and "sheltered housing/care homes" for the NAIL accommodation.
114. A revised estimate of trip generation has therefore been undertaken by Brent's officers based on six outer London affordable housing developments and ten "retirement & care community sites" (category 03-O in TRICS), which together shows higher overall flows than the applicant's exercise.
115. Brent's assessment concludes that the development would be likely to generate 23 arrivals/108 departures in the morning peak hour (8-9am) and 56 arrivals/36 departures in the afternoon peak hour (5-6pm).
116. The community hall is essentially replacing an existing youth centre on the site, so trip patterns for this use are not considered likely to change from the existing situation.
117. Of the new trips generated, 6 arrivals/13 departures in the morning peak hour and 6 arrivals/5 departures in the evening peak hour are estimated to be by car drivers. This represents an increase of about 25% to flows in the area in the morning peak hour and about 10% in the evening peak hour, based upon ATC surveys undertaken by the applicant at the southern ends of London Road and Cecil Avenue (n.b. the impact in percentage terms would fall further north, as background traffic flows increase).
118. These increased flows are not considered likely to have a significant impact on highway capacity in the area, so no further junction capacity assessments are considered to be necessary.
119. However, the generated traffic will be travelling the length of London Road and Cecil Avenue, which are long roads. Speed counts in the area suggest that 85%ile speeds are typically in the mid-20's and a

traffic calming scheme for London Road and Cecil Avenue is therefore also sought through a condition to any forthcoming consent to ensure the speed of the additional traffic generated by the development is kept closer to 20mph.

120. With regard to public transport impacts, neither the applicant's nor Brent's assessments suggest that the development would generate any more than 24 additional bus trips in either peak hour. This would equate to far less than one additional passenger per bus travelling through the area, so is not considered to be significant. It is noted that TfL have requested a contribution towards bus capacity improvements within the area, and this matter will continue to be discussed with TfL as part of the stage 2 referral to the Mayor.
121. Similarly, the increase in rail/Underground trips forecast by the applicant (which is significantly higher than Brent's forecast) would also amount to only about one additional passenger per train, which is also not considered to be significant.
122. Brent's assessment predicts that the development will generate 48 additional purely walking trips in the morning peak hour and 40 in the evening peak hour (which is significantly higher than forecast by the applicant), with trips by public transport also being made initially on foot to reach the bus stop/station. Up to three cyclist trips are also forecast in the afternoon peak hour.
123. To assess the quality of pedestrian and cyclist infrastructure around the site, PERS and CLOS audits were undertaken.
124. Generally, all routes and links in the area scored well for pedestrians, although detailed comments did note the poor quality of the surfacing (which is a maintenance issue) and regular instances of overhanging vehicles from private driveways along London Road, which would be a private matter between the Highway Authority and individual householders to address.
125. For cyclists, routes along London Road and Cecil Avenue are fine, but difficulties were noted at the junctions with High Road and along High Road itself. The Council is in the early stages of developing proposals to improve pedestrian and cyclist facilities along High Road, so this could form a potential use for any CIL funds that are secured. PROW 87 will also be re-diverted and upgraded as part of Ark Elvin School expansion.
126. The traffic calming measures for London Road and Cecil Avenue suggested above would also help to improve conditions for pedestrians and cyclists by keeping vehicle speeds to a safer level.

Travel Plan

127. The size of the development is above that at which TfL Guidelines require a Residential Travel Plan to be produced.
128. A Travel Plan has therefore been attached as an Appendix to the Transport Assessment. This proposes that travel plan initiatives are managed by a Brent Council's Housing Management Team. The proposed initiatives largely centre around the provision of travel information through Welcome Packs, noticeboards and online journey planning sites. The success of the Travel Plan will then be monitored annually over a five year period.
129. However, the submitted Travel Plan is considered to be poor and is not therefore acceptable in its submitted form. It does not set out any targets for altering modal share across the lifetime of the development and does not propose a robust monitoring or review strategy, suggesting only that the condition of the cycle parking and the demand for car parking will be monitored.
130. The proposed measures are also extremely limited. In particular, no mention is made of establishing a Car Club at the site, which is considered to be a key measure for a residential development with low levels of parking. The nearest existing Car Club vehicles are a fairly long walk away and the development should be large enough in its own right to support a Car Club vehicle. An approach should be made to a Car Club operator to establish the feasibility of providing a vehicle at the site. This will also require the promotion of the Car Club to new residents with an offer of free membership for three years.
131. Finally, for the Travel Plan to be acceptable, baseline modal share estimates need to be established and targets set for amending these. Detailed monitoring surveys will then need to be undertaken at least biennially to establish progress towards those targets. It is recommended that a condition is secured for

an updated Travel Plan to address these issues.

Sustainability

132. The applicant has included an Energy and Sustainability Statement.

133. The proposed regulated development with 'Be Lean', 'Be Clean' and 'Be Green' measures incorporated is confirmed to emit 120.18 regulated tonnes of Carbon Dioxide per annum, which is down from a baseline emission of 193.75 tonnes per annum. This equates to a 35.97% reduction on the minimum building regulations (2013) as required within the London Plan, although does not achieve the zero carbon goal and as such requires an offset payment. The offset payment shall cover a 30 year period of emissions, with the payment being equivalent to £60 per tonne per annum. This payment will be secured through a condition to any forthcoming consent. With the modelling provided, a payment of £216,324 would be secured for this purpose.

134. The details of the energy efficiency improvements are as follows:

Be Lean (total savings from 'be lean': 8.42 tonnes / 4.35%)

135. Use of passive design measures.

136. Use of energy efficiency measures.

Be Clean (total savings from 'be clean': 51 tonnes / 26.32%)

137. The use of a natural gas Combined Heat and Power unit (CHP) to supply circa 55% of the total heat demand of the development.

138. Remaining heat demand provided by efficient boilers.

Be Green (total savings from 'be green': 14.15 tonnes / 7.3%)

- Review of various renewable technology feasibility.
- 34kWp of PV panels to be incorporated across the three building rooftops resulting in significant carbon savings.
- The GLA has reviewed the energy and sustainability aspects of the proposal. They consider that further emissions data should be provided, as well as further consideration of alternative low carbon heating methods and district heating opportunities. In line with GLA recommendations, officers will impose a condition requiring the development to include a future connection point between the site's CHP and any future district heat networks to which the CHP could connect. These aspects will need to be picked up by the applicant's energy consultant ahead of a Stage 2 referral to the GLA.

Environmental Health

Air Quality

- An air quality assessment considering the impacts of the proposed redevelopment of the site on air quality has been submitted.
 - The report has considered the impacts that would be incurred during the construction phase and during the operational phase.
 - Under best practice guidance, the proposed development will constitute a medium risk for construction dust and dust generation is likely to be the main impact associated with construction. A series of mitigation measures are proposed which would form part of the construction management plan for the development. These measures include elements such as sheeted vehicles, enforcement of minimum drop heights, covered skips and dust suppression through water.
139. During the operational phase, the applicants study confirms that the development is expected to meet all air quality objectives as measured at on-site receptors and that no special mitigation would be required to meet air quality objectives. Nonetheless, the applicants confirm that boilers should achieve a NO_x rating of below 40 mg NO_x/kWh. In addition, NO_x emission standards for CHP units will be met, with it being confirmed that the development will fall within the Band B requirements for emission limits.

140. The air quality report includes an air quality neutral assessment which concludes that the building emissions from the proposed development are within the benchmarked emissions, fully meeting air quality neutral requirements.

141. The methodology set out in the air quality report will be secured by condition.

Noise and Vibration Impact

142. The site sits nearby to railway land to the south, specifically Stonebridge Park depot alongside the West Coast Mainline. The southernmost part of the site (around where the temporary block is proposed) to the railway still sits about 50m from the depot building and about 60m from the nearest railway. The railway will be a significant local source of noise and it will be necessary for the applicants to undertake a noise and vibration study to ascertain the noise impact on the new residents, and, based on the findings, to potentially propose a programme of mitigation.

143. A condition will require that a noise and vibration assessment is submitted to the Council for officers' consideration and that the details of an acceptable report are fully implemented.

Construction Management

144. The development is within an Air Quality Management Area and located very close to other residential properties. Construction therefore has the potential to contribute to background air pollution levels and cause nuisance to neighbours. A construction method statement is therefore required for submission and approval by condition to minimise the impact on local air quality and protect the amenity of neighbours during construction.

Contaminated Land

145. The site has a history of non-residential and car parking uses, as such it is possible that the soil below the site is contaminated. An assessment of land contamination will need to be undertaken and submitted to the Council through condition. Based on the findings, a remediation strategy may be necessary and a condition will require that the means of remediation are demonstrated.

Lighting

146. Any new lighting at the proposed site should be installed considering existing homes and buildings. The new development must not give rise to light or other nuisance to nearby residents. A condition will require that, should external lighting be installed, details of the lighting, including a measure of lux levels, is submitted and approved by the Council.

Flooding and Drainage

147. The site is located just to the north of the Wembley Brook watercourse, although does fall within flood zone 1 of the Environment Agency's flood designations (the lowest flood risk). Nonetheless, given the scale of the proposal the applicant has submitted a report addressing flood risks of the development.

148. The document has been reviewed by Brent's Local Lead Flood Authority who notes that the proposal includes permeable paving and a number of storage tanks to regulate surface water discharge from the site. The proposed surface water discharge will be restricted to 5 litres per second and this will reduce the flow into the existing surface water sewer network and will drastically reduce the existing flood risk of the site. The details of the report shall be secured by condition.

149. Thames Water have reviewed the proposal and have identified an inability of the existing surface water infrastructure to accommodate the needs of this development proposal. Thames Water have therefore requested that a condition is imposed on the applicant requiring that, prior to occupation of the development, appropriate surface water network upgrades are installed OR a housing and infrastructure phasing plan is agreed that would manage the demand on the network. Thames Water confirm that they have no objection to the application in terms of sewerage infrastructure capacity.

150. Thames Water also note that the development is close to subsurface Thames Water assets, including strategic sewers. A condition requiring a piling method statement to be submitted and approved in consultation with Thames Water prior to piling is to therefore be secured.

Trees and Landscaping

151. The applicant has submitted an arboricultural assessment which identifies 43 existing trees on site. A number of these trees in the centre of the site are protected by Tree Preservation Orders. The trees on site are predominantly in average condition (Category B and C) with some being in very poor condition (Category U). The applicant's tree constraints plan indicates a proposal to remove a large number of the trees on site, including all those which are protected by tree preservation order. 15 trees are to be retained and protected including most of the trees along the eastern edge of the site which border the playing fields and the protected open space. The retained trees are confirmed to be protected from damage during construction through protective fencing within the relevant root protection areas.
152. The applicant's landscaping plan indicates a very comprehensive plan for replacement planting whose amenity value would far outweigh the small number of tree losses otherwise incurred. The proposal is for 85 trees to be planted, which, when weighed against the 29 trees to be lost, would be result in a net gain of 56 trees on site. Many of the trees would be planted as new street trees, along the newly formed cul-de-sacs, with the rest being provided within the linear park, the communal amenity spaces of all three blocks and within the focal outdoor space outside the community centre.
153. Brent's tree and landscaping officers have reviewed the plans and welcome the landscaping proposals and, subject to their implementation, would not object to the existing tree losses. It is noted that the tree losses are from within land formally protected as open space, however as detailed above in paragraphs 3-5, it is not considered that the losses are significant in the context of the character of the wider open space designation and when it is weighed against the replacement scheme. A condition will require that final detailed landscaping drawings are submitted, approved and implemented prior to the occupation of the development.

Ecology

154. The site is close to a Grade I Site in Nature Conservation (SINC) located alongside the nearby brook to the south of the site. This land is also designated as a wildlife corridor. These designations are located approximately 4 to 5 metres from the southern edge of the application site, with the separation formed by a pedestrian footpath between London Road and Lyon Park Avenue. Brent Policy DMP8 and London Plan policy 7.19 require that developments pay due regard to the ecological value of such protected spaces.
155. The submitted ecology report indicates the protected and priority species identified on or near site. This includes bats only but precautionary measures for hedgehogs were also incorporated. The invasive plant cotoneaster was identified around the community centre.
156. In terms of ecologist recommendations, further bat surveys (two dusk emergence and one dawn re-entry) were recommended to be undertaken between May and September. Vegetation clearance is recommended to be undertaken outside of the main bird breeding season and any active nests found are to be protected until nesting has concluded. One for one tree replacement is also required (as is achieved in the planting plan) with broadleaf specimens. Landscaping is proposed to be native and wildlife attracting to minimise impact on local invertebrate foraging habitat. Finally, any shrub, hedgerow or ground vegetation clearance is to be undertaken in the main active season for hedgehogs to avoid disturbing potential hedgehog habitats, and fencing around the site should have regular gaps in the base to enable movement for hedgehogs.
157. In terms of ecological enhancements, Schwegler type bat and bird boxes are suggested for inclusion at heights of above 4 metres on new buildings or retained trees, facing away from direct sunlight. A focus on native and wildlife attracting vegetation species, with fruit trees and shrubs being prioritised for foraging benefit is also suggested. Finally, a stag beetle logger, created through the partial burying of logs or retaining stumps from removed native broad-leaved trees, is suggested for incorporation into the development.
158. The recommendations and enhancement suggestions are considered to be thorough and robust given the local ecological designations, and it is therefore considered that the scheme, subject to the above measures, would not result in any unduly harmful impact on the biodiversity in the area and may be of benefit to local ecology. A condition will require that the abovementioned recommendations and enhancements are submitted in plan form and then implemented prior to the occupation of the development.

Fire Safety

159. Fire Safety is formally considered at Building Regulations stage, however the applicants have clarified a fire safety strategy within their planning submission as follows.

Block A

160. Block A may be utilised as a specialised housing development as it may offer sheltered housing / assisted living to the building occupants. However, it has been confirmed by the client that the likelihood is the tenants shall be able to self-evacuate and no additional facilities above a standard 'mainstream' housing development would be required. However, for conservative purposes, additional fire safety precautions such as sprinklers shall be included.

Block B

161. Whilst not required for Building Regulations, a sprinkler system shall be provided to Block B. There shall be 8no. triplex flats also located within the vicinity of Block B that are accessed independently from all other areas. These shall be designed as independent houses in accordance with the guidance contained in BS 9991.

Block C

162. Similar to Block B, a sprinkler system is not required for Building Regulations, however one shall be provided.

CIL liability

163. The development is CIL liable, however all of the housing within the scheme would be secured as affordable housing and would therefore be liable for full relief on CIL payment. This relief must be proactively applied for by the developer and agreed with the Local Planning Authority prior to being given.

164. The community centre component of the scheme is floor space within the D1 use class. Brent's CIL charging schedule specifies a zero charge on D1 floor space, however the Mayor's CIL charging schedule specifies (as of April 1st 2019) a £60/sqm charge on all non-health/education floor space, including that in the D1 use class. As such, subject to relief being applied for and given on the residential floor space, the scheme will only be liable for CIL payment to the Mayor in relation to the new D1 floorspace.

Equalities

165. In line with the Public Sector Equality Duty, the Council must have due regard to the need to eliminate discrimination and advance equality of opportunity, as set out in section 149 of the Equality Act 2010. In making this recommendation, regard has been given to the Public Sector Equality Duty and the relevant protected characteristics (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation).

Conclusion

166. Following the above discussion, and weighing up all aspects of the proposal, officers consider that the proposal should be approved subject to conditions.

CIL DETAILS

This application is liable to pay **£5,710,979.13** * 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): 495 sq. m.

Total amount of floorspace on completion (G): 17206.78 sq. m.

Use	Floorspace on completion (Gr)	Eligible* retained floorspace (Kr)	Net area chargeable at rate R (A)	Rate R: Brent multiplier used	Rate R: Mayoral multiplier used	Brent sub-total	Mayoral sub-total
(Brent) Dwelling houses	16914.2		16427.62	£200.00	£0.00	£4,708,272.33	£0.00
(Mayoral) Non-residential institutions	292.58		284.16	£0.00	£0.00	£0.00	£0.00
(Mayoral) Dwelling houses	16914.2		16427.62	£0.00	£60.00	£0.00	£985,657.01
(Mayoral) Non-residential institutions	292.58		284.16	£0.00	£60.00	£0.00	£17,049.79

BCIS figure for year in which the charging schedule took effect (Ic) BCIS figure for year in which the planning permission was granted (Ip) TOTAL CHARGEABLE AMOUNT	224	323
	321	
	£4,708,272.33	£1,002,706.80

*All figures are calculated using the formula under Regulation 40(6) and all figures are subject to index linking as per Regulation 40(5). The index linking will be reviewed when a Demand Notice is issued.

**Eligible means the building contains a part that has been in lawful use for a continuous period of at least six months within the period of three years ending on the day planning permission first permits the chargeable development.

Please Note : CIL liability is calculated at the time at which planning permission first permits development. As such, the CIL liability specified within this report is based on current levels of indexation and is provided for indicative purposes only. It also does not take account of development that may benefit from relief, such as Affordable Housing.

DRAFT DECISION NOTICE



Brent

DRAFT NOTICE

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

DECISION NOTICE – APPROVAL

Application No: 18/4273

To: Mr Martin
PRP Architects LLP
10 Lindsey Street
Smithfield
London
EC1A 9HP

I refer to your application dated **06/11/2018** proposing the following:

Demolition of community centre and erection of three residential blocks ranging from three to seven storeys in height comprising a total of 170 residential units (67 x 1 bed, 82 x 2 Bed, 13 x 3 Bed and 8 houses) with community centre, new vehicular and pedestrian access, provision for car parking, cycle and refuse storage, amenity spaces and gardens and associated landscaping.

The proposed development does not accord with the provisions of the development plan in force in the area as it seeks to develop land designated as open space within Brent's Core Strategy policy CP18.

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

at **Wembley Youth Centre and Land next to Ex Dennis Jackson Centre, London Road, Wembley, HA9**

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: 11/06/2019

Signature:

Alice Lester

Head of Planning, Transport and Licensing

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

SUMMARY OF REASONS FOR APPROVAL

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

- National Planning Policy Framework 2018
- The London Plan 2016
- Brent's Core Strategy 2010
- Brent's Development Management Policies 2016
- Brent's Supplementary planning Document 1: Design Guide for New Development 2018

- 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.

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

Z-2001

Z-2002

Z-2003

A-2100

A-2300

B-2110

B-2111

B-2112

B-2113

B-2114

B-2115

B-2116

B-2117

B-2310

B-2311

B-2312

C-1120

C-1121

C-1122

C-1320

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

- 3 The development hereby approved shall be implemented and maintained for the lifetime of the development as 100% affordable rented housing (at rents up to 80% of the market rents and capped at Local Housing Allowance rates, inclusive of service charge, intended for households who cannot afford housing at market rates) and LB Brent will have the right to nominate people to be housed in the whole of the affordable housing development, unless otherwise agreed in writing with the local planning authority.

Reason: To ensure the development is implemented in accordance with the approved details submitted having regard to Local Plan affordable housing policy, the weight that was given to this scheme being 100% affordable when reaching a decision and to contribute to meeting Brent's identified housing needs, including meeting LB Brent's statutory housing duties.

- 4 The temporary accommodations contained within Block C shall have a maximum occupancy period per tenant/s of no more than 24 months.

Reason: To ensure that the reduced standards of the accommodation are not able to be experienced on a permanent basis, as this would be to the detriment of residential amenity for occupants.

- 5 The community centre facilities hereby permitted shall only be used for community events and community activities and for no other purposes within Class D1 of the schedule to the Use Classes Order 1987 (as amended) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order, with or without modification.

Reason: To ensure that the use remains appropriate for the site location and to ensure that the standards applied to the consideration of the approved development are maintained in connection with the completed development so approved.

- 6 The residential units hereby approved shall at no time be converted from C3 residential to a C4 small HMO, notwithstanding the provisions of Schedule 2 Part 3 Class L of the Town and Country Planning (General Permitted Development) Order 2015 (or any order revoking and re-enacting that Order) without express planning permission having first been granted by the Local Planning Authority.

Reason: To ensure that an adequate standard of accommodation is maintained in all of the residential units and in view of the restricted space within the site to accommodate additional bin or cycle storage.

- 7 When the D1 floorspace is brought into use, priority for booking and using this D1 facility located on the ground floor of the Temporary Accommodation building shall be given to community/voluntary groups for a minimum of 20 hours per week.

Reason: To provide the community with an appropriate provision of community space within the Borough.

- 8 The approved parking spaces, cycle storage facilities and bin storage facilities shall be installed and made available for use prior to first occupation of the development hereby approved and thereafter retained and maintained for the life of the development and not used other than for purposes ancillary to the occupation of the development hereby approved.

Reason: To encourage sustainable forms of transportation in the interest of highway flow and safety.

- 9 The buildings shall be designed so that mains water consumption does not exceed a target of 105 litres or less per person per day, using a fittings-based approach to determine the water consumption of the development in accordance with requirement G2 of Schedule 1 to the

Reason: In order to ensure a sustainable development by minimising water consumption.

- 10 Following first occupation of the development, the full extent of the linear park (as shown between the general purpose affordable rented block and the boundary with the playing fields on the Landscape GA – Ground Floor Plan drawing no: L0479L01) as well as the linear park entrance spaces at both ends of the linear park (as annotated on the Landscape GA – Ground Floor Plan drawing no: L0479L01 and shown in a yellow colour on this plan), inclusive of the play areas in these spaces, shall remain unobstructed and publically accessible at all times for at least 364 (three hundred and sixty four) days per calendar year, except during discrete temporary periods of footway maintenance. The above restriction shall apply unless an alternative arrangement is first agreed in writing by the Local Planning Authority.

Reason: To ensure the development improves local pedestrian permeability for the benefit of local residents and visitors.

- 11 Not less than 10% of residential units shall be constructed to wheelchair accessible requirements (Building Regulations M4(3)) or shall meet easily accessible/adaptable standards (Building Regulations M4(2)) unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure suitable facilities for disabled users, in accordance with the London Plan policy 4.5.

- 12 The full set of mitigation measures recommended for inclusion in the development, as set out in the London Road Overheating Analysis, dated October 2018 (reference: J2331) shall be implemented in full prior to the first occupation of the development hereby approved. The mitigation measures include internal blinds for top floor dwellings and a balcony shading parapet to one room. The above restriction shall apply unless an alternative arrangement is first agreed in writing by the Local Planning Authority.

Reason: To ensure the development provides accommodation with high standards of amenity.

- 13 The mitigation measures specified in the Air Quality Assessment – Final Issue, prepared by Temple and dated October 2018, shall be adhered to in full following the commencement of the development.

Reason: To appropriately mitigate impacts on air quality arising from the development

- 14 The development hereby approved shall be carried out in full accordance with the details stipulated in the Stage 3 Drainage Design Report, prepared by Ellis+Moore and dated October 2018 (Ref: 16789-VIV-STG3-01).

Reason: To ensure the safe development and secure occupancy of the site proposed for residential use.

- 15 All recommendations and enhancement measures contained within the submitted Preliminary Ecological Assessment, prepared by Oisin Kelly Arboricultural Consultant and dated June 2017 shall be adhered to throughout the construction of development.

Reason: To protect and enhance local ecosystems that would otherwise be unduly impacted by the development.

- 16 No development shall be carried out until the person carrying out the works is a member of the

Considerate Constructors Scheme and its code of practice, and the details of the membership and contact details are clearly displayed on the site so that they can be easily read by members of the public.

Reason: To limit the impact of construction upon the levels of amenity that neighbouring occupiers should reasonably expect to enjoy.

Pre-commencement reason: The considerate constructors scheme is designed to govern practices during the construction and therefore needs to be arranged prior to the construction works being carried out.

- 17 (a) No development shall commence on site until a Training & Employment Plan has been submitted to and approved in writing by the Local Planning Authority which shall include but not be limited to the following:

- (i) the details of the Training & Employment Co-ordinator;
- (ii) a methodology for meeting the Training & Employment Targets and the Training & Employment Reporting Schedule;
- (iii) a commitment to offer an interview to any job applicant who is a resident in Brent provided that they meet the minimum criteria for the particular job

The approved Training and Employment Plan shall be implemented throughout the construction phases of the development for the lifetime of the construction of the Development.

(b) The new school buildings shall not be occupied until the Training & Employment Verification Report has been submitted to and approved in writing by the Council.

Reason: In the interest of providing local employment opportunities.

Pre-commencement reason: part (a) of the condition seeks to exercise control over training and employment of Brent residents throughout the construction phase of the development and therefore needs to be discharged prior to construction.

- 18 Prior to the commencement of the development, a Construction Method Statement which incorporates a dust management plan shall be submitted to and approved in writing by the Local Planning Authority outlining measures that will be taken to control dust, noise, construction traffic and other environmental impacts of the development. The approved statement shall be implemented throughout the duration of construction.

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

Pre-commencement reason: The condition seeks to exercise control over the construction phase of the development and therefore needs to be discharged prior to construction.

- 19 Prior to commencement of the development hereby approved, a construction logistics plan shall be submitted to and approved in writing by the Local Planning Authority.

The development shall thereafter be carried out in accordance with the approved construction logistics plan.

Reason: To ensure construction processes do not unduly prejudice the free and safe flow of local highways.

Pre-commencement reason: The condition seeks to exercise control over the construction phase of the development and therefore needs to be discharged prior to construction.

- 20 The development hereby permitted shall not be commenced until detailed design and method statements (in consultation with London Underground) for each stage of the development for all of the demolition, foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent),

have been submitted to and approved in writing by the local planning authority which:

- provide details on all structures
- provide details on the use of tall plant/scaffolding
- accommodate the location of the existing London Underground structures
- demonstrate access to elevations of the building adjacent to the property boundary with London Underground can be undertaken without recourse to entering our land
- indemnify TfL of any future noise or pollution complaints (Stonebridge Park is a 24/7 operational railway depot with noise, lighting and train movements)
- demonstrate that there will at no time be any potential security risk to our railway, property or structures
- accommodate ground movement arising from the construction thereof
- mitigate the effects of noise and vibration arising from the adjoining operations within the structures

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2015 Table 6.1, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.

Pre-commencement reason: The condition seeks to exercise control over the construction phase of the development and therefore needs to be discharged prior to construction.

- 21 (a) Prior to commencement of works on site (excluding demolition) an Energy Assessment shall be submitted to and approved in writing by the Local Planning Authority. This shall include a 100% reduction of the development's regulated carbon emissions beyond the Target Emission Rates to achieve 'zero carbon' development including a minimum 35% reduction achieved through on site measures, being the standards for CO2 reduction set out in the London Plan.

The applicant shall enter into a Memorandum of Understanding with the Local Planning Authority in order to provide appropriate offsetting measures for the development's carbon emissions as approved within the above Energy Assessment.

(b) No later than two months after practical completion of the development an Energy Assessment Review shall be submitted to and approved in writing by the Local Planning Authority. This shall include a review of the energy assessment commissioned at the applicant's expense and prepared by an independent assessor to demonstrate as built construction is in accordance with the approved Energy Assessment.

The applicant shall enter into a Memorandum of Understanding with the Local Planning Authority in order to provide appropriate offsetting measures for the development's carbon emissions as approved within the review of the Energy Assessment.

Reason: To ensure the development is in accordance with the principles of London Plan Policy 5.2.

- 22 Prior to the commencement of construction works (excluding demolition of the existing building on site), details of how the development is designed to allow future connection to a district heating network should one become available, shall be submitted to and approved in writing by the local planning authority and the development shall be completed in accordance with the approved details.

Reason: To ensure the development is in accordance with the principles of London Plan Policy 5.6

- 23 Prior to the commencement of the development (excluding demolition of the existing building on site), an assessment of noise and vibration from sources within the environment surrounding the development site shall be submitted to and approved in writing by the Local Planning Authority. If necessary, the assessment shall detail a schedule of noise and vibration mitigation which would result in the development achieving the relevant British Standards for internal noise and vibration levels in residential units.

The approved details, inclusive of any mitigation specified, shall be implemented in full prior to the first occupation of the development hereby approved.

Reason: To appropriately mitigate noise and vibration from surrounding sources, particularly in view of the development's proximity to a railway.

- 24 (a) Prior to the commencement of any works on site, with the exception of works necessary to facilitate compliance with part (a) of this condition, a Site Investigation shall be submitted to and approved in writing by the Local Planning Authority. The Site Investigation shall be carried out by competent persons in accordance with the principles of BS 10175:2011 to determine the nature and extent of any soil contamination present; include the results of any research and analysis undertaken as well as an assessment of the risks posed by any identified contamination; and include an appraisal of remediation options should any contamination be found that presents an unacceptable risk to any identified receptors.

(b) Prior to the commencement of any works, with the exception of works necessary to facilitate compliance with part (b) of this condition and UNLESS the Local Planning Authority has previously confirmed in discharging part (a) above that no remediation measures are required, a Remediation Strategy shall be submitted to and approved in writing by the Local Planning Authority. The Remediation Strategy shall specify measures to contain, treat or remove any soil contamination to bring the site to a condition suitable for the intended residential use; include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures; ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

The works shall be carried in accordance with the approved details in accordance with the approved timetable of works. The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works. Any remediation measures required by part (a) above shall be carried out in full.

(c) Prior to the occupation of the Development and UNLESS the Local Planning Authority has previously confirmed in discharging part (a) above that no remediation measures are required, a Verification Report shall be submitted to and approved in writing by the Local Planning Authority. The Remediation Verification Report shall demonstrate that the remediation has been carried out in accordance with the approved Remediation Strategy; and that the Development is permitted for its approved end use.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off site receptors.

- 25 No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including

measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

- 26 Prior to commencement of works above ground level, details of materials for all external work, including samples which shall be made available for viewing on site, shall be submitted to and approved in writing by the Local Planning Authority. 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.

- 27 Within three months of commencement of the development, a revised site layout plan shall be submitted to and approved in writing by the Local Planning Authority that indicate an altered site layout that shows the following alterations:

1. Footways that are widened to a minimum width of 2m.
2. The repositioning of the existing electricity substation on site to a suitable location at least 2m from the edge of the carriageway of the new access road.

Thereafter, the site layout shall be completed in accordance with the approved plans prior to first occupation of any part of the development.

Reason: To ensure the development provides a safe means of access to it for vehicles and pedestrians.

- 28 Within three months of commencement of the development, the developer shall enter into an agreement with the Local Highways Authority to carry out the following works:

1. Construct new access roads, footways, verges, shared surface turning heads, parking spaces, bicycle parking, street lighting, drainage and all other associated signage and street furniture;
2. Provide amended kerbs and a raised table at the southern end of London Road at the entrance to the site;
3. Install traffic calming measures along the lengths of London Road and Cecil Avenue;
4. Provide suitable signage and remove overhanging hedges from the site boundary to allow use of the footpath linking the site to High Road by cyclists;

The development shall not be occupied until evidence that the abovementioned highway works have been implemented in full and certified as completed to an acceptable standard by the Local Highways Authority has been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the development provides a safe and functional highway environment to connect the development with its surroundings.

- 29 Within six months of works commencement on site, details of opaque physical divisions, clearly establishing a private section of the roof terrace for each sixth floor flat within Block B, shall be submitted to and approved in writing by the Local Planning Authority. The physical divisions shall thereafter be implemented prior to the first occupation of any unit on the sixth floor of the

general purpose affordable rented block and retained in perpetuity. The above restriction shall apply unless an alternative arrangement is first agreed in writing by the Local Planning Authority.

Reason: To ensure that all flats are afforded sufficient privacy.

- 30 Within six months of commencement of development, further details of hard and soft landscaping shall be submitted to and approved in writing by the Local Planning Authority. Such details shall include:

- (a) Details of proposed soft landscaping including species, locations and numbers
- (b) Details of the material treatment of the surfaces delineating the separation of pedestrian and vehicle movement areas within the proposed highways
- (c) Details of hardsurfaced areas
- (d) Details of external lighting
- (e) Details of bat and bird boxes
- (f) Details of boundary treatments within the site and along its boundaries
- (g) Details of any external seating and other features
- (h) Details of play equipment
- (j) Details of a management plan for a minimum of 5 year period

The hard and soft landscaping shall be completed prior to first occupation of the development hereby approved (or other timescales to be agreed in writing by the Local Planning Authority).

Any planting that is part of the approved scheme that within the lifetime of the development after planting is removed, dies or becomes seriously damaged or diseased, shall be replaced in the next planting season and all planting shall be replaced with others of a similar size and species and in the same position, unless the Local Planning Authority first gives written consent to any variation.

Reason: To preserve the amenities of nearby residents and to prevent privacy being compromised.

- 31 Within six months of commencement of the development, details of any external lighting shall be submitted to and approved in writing by the Local Planning Authority. This shall include details of the lighting fixtures, luminance levels within and adjoining the site. The lighting shall not spill onto the nearby railway infrastructure. The lighting shall not be installed other than in accordance with the approved details.

Reason: In the interests of safety and the amenities of the area.

- 32 Within six months of commencement of work on site, detailed drawings showing the photovoltaic panel arrays on the roofs of the proposed buildings shall be submitted to and approved in writing by the Local Planning Authority.

The photovoltaic panel arrays shall be installed in accordance with the approved drawings and made operational prior to occupation of the development hereby approved.

Reason: To ensure that the development minimises its carbon emissions, in accordance with London Plan policy 5.2.

- 33 The tree protection measures as set out within the Arboricultural Impact Assessment prepared by Oisin Kelly shall be adhered to through all stages of construction, unless otherwise agreed in writing by the Local Planning Authority. Prior to the commencement of works arrangements shall be made with the Council's tree officer to carry out a site visit to inspect the tree protection measures as installed.

Reason: To protect existing trees during the course of construction works in order to ensure that the character and amenity of the area are not impaired.

- 34 Prior to first occupation of the development hereby approved, the developer shall enter into a Memorandum of Understanding with the Local Planning Authority in order to provide appropriate

mitigation measures for the development's impacts on local bus capacity.

Reason: To ensure the development sustainably offsets its impact on the local transport network.

- 35 Prior to first occupation of the development hereby approved, further details of electric vehicle charging points shall be submitted to and approved in writing by the Local Planning Authority. Such details shall include use of at least 20% of the approved car parking spaces with EVCP within the site. The provision of electric vehicle charging points shall be in accordance with adopted London Plan standards, providing both active and passive charging points.

Reason: To encourage the uptake of electric vehicles as part of the aims of the adopted London Plan policy 6.13.

- 36 Prior to the occupation of the development a Nominations Agreement to define nominations criteria and arrangements shall be entered into with the Council, and submitted to and approved in writing by the Local Planning Authority. The Nominations Agreement will set out the policies and procedures for the nomination by the Council of prospective tenants to the development and shall be implemented on occupation and shall remain in effect for the lifetime of the development.

Reason: To ensure the development is implemented in accordance with the approved details submitted having regard to Local Plan affordable housing policy, the weight that was given to this scheme being 100% affordable when reaching a decision, and to contribute to meeting Brent's identified housing needs, including meeting LB Brent's statutory housing duties.

- 37 Prior to the occupation of the development the applicant shall submit to the local planning authority for its approval a Management Plan for the operation of the Temporary Accommodation. The development shall be carried out in accordance with the approved Plan, unless otherwise agreed in writing by the Local Planning Authority.

Reason: In order to ensure that reports to any party will be shared and acted upon.

- 38 Occupiers of the residential development, hereby approved, shall not be entitled to a Residents Parking Permit or Visitors Parking Permit to allow the parking of a motor car within the Controlled Parking Zone (CPZ) operating in the locality within which the development is situated unless the occupier is entitled; to be a holder of a Disabled Persons Badge issued pursuant to Section 21 of the Chronically Sick and Disabled Persons Act 1970. For the lifetime of the development written notification of this restriction shall be included in any licence transfer lease or tenancy agreement in respect of the residential development. For the lifetime of the development a notice, no smaller than 30cm in height and 21cm in width, clearly informing occupants of this restriction shall be displayed within the ground floor communal entrance lobby of each building, in a location and at a height clearly visible to all occupants. On, or after, practical completion but prior to any occupation of the residential development, hereby approved, written notification shall be submitted to the Local Highways Authority confirming the completion of the development and that the above restriction will be imposed on all future occupiers of the residential development.

Reason: In order to ensure that the development does not result in an increased demand for parking that cannot be safely met within the locality of the site.

- 39 Prior to the first occupation of the development hereby approved, a car park management plan shall be submitted to and approved in writing by the Local Planning Authority. The approved details shall thereafter be adhered to in full, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure an appropriate parking arrangement and system of parking management for the development.

- 40 Prior to the first occupation of the development hereby approved, a delivery and servicing plan for the development shall be submitted to and approved in writing by the Local Planning Authority. The approved details shall thereafter be adhered to in full, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure an appropriate parking arrangement and system of parking management for the development.

- 41 Prior to first use of the community centre hereby approved, a Community Access Plan detailing community access arrangements for the community centre shall be submitted to and approved in writing by the Local Planning Authority. The Community Access Plan shall include details of rates of hire (based upon those charged at other public facilities), terms of access, hours of use and management responsibilities.

The approved updated Community Access Plan shall be brought into operation within 3 months of first use of the community centre and it shall remain in operation for the duration of the use of the development.

Reason: To secure well-managed, safe community access to the community centre, to ensure sufficient benefit to the public and to accord with Local Plan.

- 42 Prior to first occupation of the development hereby approved details of a communal television aerial and satellite dish system for each of the three buildings linking to all residential units within the development, shall be submitted to and approved in writing by the Local Planning Authority, and thereafter implemented in accordance with the approved details. No further television aerial or satellite dishes shall be erected on the premises.

Reason: In the interests of the visual appearance of the development in particular and the locality in general.

- 43 Any plant shall be installed, together with any associated ducting, so as to prevent the transmission of noise and vibration into any neighbouring premises. The noise level from any plant shall be 10 dB(A) or greater below the measured background noise level at the nearest noise sensitive premises. The method of assessment should be carried out in accordance with BS4142:2014 'Methods for rating and assessing industrial and commercial sound.' An assessment of the expected noise levels and any mitigation measures necessary to achieve the required noise levels shall be submitted to and approved in writing by the Local Planning Authority prior to installation of such plant. All plant shall thereafter be installed and maintained in accordance with the approved details.

Reason: To safeguard the amenity of the neighbours.

- 44 The development shall not be occupied unless confirmation in writing has been submitted to and approved in writing by the Local Planning Authority, in consultation with Thames Water, that either 1) all surface water network upgrades required to accommodate the additional flows from the development have been completed; or 2) a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied.

Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.

Reason: The development may lead to flooding and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional flows anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid sewer flooding and/or potential pollution incidents.

- 45 Prior to the first occupation of the development hereby approved, a travel plan of sufficient

quality to score a PASS rating when assessed under Transport for London's ATTrBuTE programme (or any replacement thereof), to incorporate targets for minimising car use, monitoring of those targets and associated measures to meet those targets, shall be submitted to and approved in writing by the Local Planning Authority.

The travel plan shall include proposed measures for introducing cycle storage for the NAIL accommodation, in the event that the building containing NAIL accommodation is re-purposed for general residential use. The travel plan shall also set out proposals for indicating separate pedestrian and cyclist routes through the car park.

The travel plan shall also set out details for the provision of a car club on the site, which would include free membership for residents of the development for a minimum period of three years starting from first occupation.

Upon first occupation of the development, the Travel Plan shall be fully implemented for the lifetime of the Development, or as amended by the agreement of the Local Planning Authority in writing.

Reason: In order to promote sustainable transport measures where on-street parking and manoeuvring may cause highway safety problems.

INFORMATIVES

- 1 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.
- 2 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 www.communities.gov.uk
- 3 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.
- 4 The applicant is advised to notify the Council's Highways Service of the intention to commence works prior to commencement. Such notification shall include photographs showing the condition of highway along the site boundaries.
- 5 Thames Water advise the applicant of the following:
A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality.
- 6 The Environment Agency advise the applicant of the following:
This development may require a permit under the Environmental Permitting (England and Wales) Regulations 2010 from the Environment Agency. This covers any proposed works or structures in, over, under or within 8m of a fluvial, or 16m of a tidal, main river or flood

defence.

Some activities may be excluded or exempt from the permitting regulations. A permit is separate, and in addition to, any planning permission granted. Further details and guidance are available on the GOV.UK website:

<https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>.

- 7 The applicant is advised to contact London Underground Infrastructure Protection in advance of preparation of final design and associated method statements, in particular with regard to: demolition; drainage; excavation; construction methods; tall plant; scaffolding; security; boundary treatment; safety barriers; landscaping and lighting.
- 8 Network Rail advise the applicant of the following:
 - (1) The developer is to submit directly to Network Rail, a Risk Assessment and Method Statement (RAMS) for all works to be undertaken within 10m of the operational railway under Construction (Design and Management) Regulations.
 - (2) If vibro-compaction machinery / piling machinery or piling and ground treatment works are to be undertaken as part of the development, details of the use of such machinery and a method statement must be submitted to the Network Rail Asset Protection Engineer for agreement.
 - (3) As the proposal includes works which may impact the existing operational railway and in order to facilitate the above, a BAPA (Basic Asset Protection Agreement) will need to be agreed between the developer and Network Rail. The applicant / developer should liaise directly with Asset Protection to set up the BAPA - AssetProtectionLNWSouth@networkrail.co.uk.
- 9 Brent 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.
- 10 The Council recommends that the maximum standards for fire safety are achieved within the development.

Any person wishing to inspect the above papers should contact Toby Huntingford, Planning and Regeneration, Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ, Tel. No. 020 8937 1903