

COMMITTEE REPORT

Planning Committee on
Item No
Case Number

19 June, 2019
07
18/4810

SITE INFORMATION

RECEIVED	14 December, 2018
WARD	Stonebridge
PLANNING AREA	Brent Connects Harlesden
LOCATION	Stonebridge Primary School Annexe, Twybridge Way, London, NW10 0ST
PROPOSAL	Demolition of the former day centre and redevelopment of the site to provide an apartment block rising to 5 storeys comprising 13 flats (4 x 1 bedroom and 9 x 2 bedroom), 14 houses rising to 3 storeys (10 x 3 bedroom and 4 x 4 bedroom), and one apartment block rising to 5 storeys comprising 40 studio flats with an element of care (Use Class C3(b)) with associated amenity space and landscaping, the creation of a new loop road, car parking, cycle storage and refuse storage
PLAN NO'S	See 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_143176</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 "18/4810" (i.e. Case Reference) into the search Box3. Click on "View Documents" tab

SITE MAP



Planning Committee Map

Site address: Stonebridge Primary School Annexe, Twybridge Way, London, NW10 0ST

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This map is indicative only.

PROPOSAL IN DETAIL

Demolition of the former day centre and redevelopment of the site to provide a total of 67 units, involving the erection of an apartment block rising to 5 storeys comprising 13 flats (4 x 1 bedroom and 9 x 2 bedroom), 14 houses rising to 3 storeys (10 x 3 bedroom and 4 x 4 bedroom), and one apartment block rising to 5 storeys comprising 40 studio flats with an element of care (Use Class C3(b)) with associated amenity space and landscaping, the creation of a new loop road, car parking, cycle storage and refuse storage.

EXISTING

The application relates to a corner plot at the junction of Hillside and Twybridge Way, with a total site area of approximately 0.61ha. The site contains the Former Day Care Centre building, currently in use as Stonebridge Primary School annexe. 'The Cottage' is a two-storey, detached building which has been subdivided into 4 units and sits to the north of the Day Care Centre, however this building is to remain and does not form part of the application site.

The surrounding context consists of two-storey residential properties to the west on Twybridge Way, and four-storey flatted blocks and two-storey housing to the east along West End Close. A canal feeder channel runs along the northern site boundary. The feeder is designated as a Site of Borough Importance for Nature Conservation (SBINC) Grade II.

This is not within a Conservation Area, nor does it affect any Listed Building.

AMENDMENTS SINCE SUBMISSION

A revised site plan has been submitted to show the following alterations, subsequent to concerns raised by highways officers:

- (a) the provision of three lay-bys along Twybridge Way in line with recommended dimensions;
- (b) the removal of two lay-bys next to the junction with Hillside, allowing a minimum pedestrian footway of 2m;
- (c) the provision of two disabled parking bays next to the five-storey NAIL apartment block;
- (d) the introduction of an over-run strip on the northern bend of the loop road, to cater for larger vehicles;
- (e) the installation of two raised entry tables and tactile paving on both Twybridge Way junctions;
- (f) the removal of a parking space adjacent to the northern bend of the loop road, allowing a new crossway.

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. Principle of development and provision of new homes, including NAIL accommodation: The proposed development of the site is in accordance with the outline consent in June 2016, the key difference being the uplift in the number of units within the NAIL accommodation from 28 to 40. The re-development of the site for housing, including affordable housing for C3b accommodation in order to meet Brent's housing needs, is acceptable in principle.
2. Affordable Housing: An element of C3b residential accommodation is proposed, this is a result of Brent Council's Adult Social Care and Housing departments New Accommodation for Independent Living (NAIL) scheme to develop Extra Care and supported living accommodation in order to provide alternatives to residential and nursing care homes. Your officers consider that there is an identified need for more of this type of accommodation with the Borough, and its delivery on site would meet a key corporate objective. All 67 units proposed will be affordable, which is a key benefit of the scheme and represents a significant uplift from the previously approved outline scheme.
3. Design and appearance: The scale, height and massing of the proposed NAIL and traditional C3 apartment blocks, as well as the townhouses, is in line with the outline permission in June 2016 and would respect the surrounding context, which includes buildings of 4-5 storeys on Hillside. The proposed architecture and materials would be of a very high quality, with all external materials to be inspected before development commences.

4. Quality of the resulting residential accommodation: The residential accommodation proposed is of sufficiently high quality. The proposed traditional housing offer includes a variety of 1, 2, 3 and 4-bedroom units in the form of family townhouses and apartments within a main block to the south of the site, and would all benefit from dual aspect and good levels of outlook and ventilation. All townhouses have access to a rear garden, and all C3 accommodation within the apartment has access to private and communal amenity space. The NAIL units have access to good levels of communal amenity space, meeting the specific needs of these occupiers.

5. Impact on neighbouring amenity: There would be a loss of light to some windows of surrounding residential properties, however this is very minimal and on balance your officers consider this acceptable given the constraints of the site. The layout and orientation of proposed buildings ensures that there would be no material loss of privacy to adjoining occupiers.

6. Highways and transportation: Sufficient levels of vehicle parking and cycle parking are proposed on site. Highway improvement works are proposed to construct the proposed loop road for the development including footways and parking bays, with minor amendments to include raised tables at the junctions with Twybridge Way and the northern bend in the road and an overrun strip at the southern bend in the road; (ii) to construct parking lay-bys along the Twybridge Road frontage of the site; and (iii) remove all signing, lining and guardrailling associated with the existing school use, together with all associated lighting, signing, lining and drainage and other ancillary and accommodation works and works necessary to statutory undertakers' equipment. Details of these works have been submitted, and are acceptable subject to a section 278 agreement. To mitigate the transportation impacts and to promote sustainable travel a Residential Travel Plan is proposed, this is to be secured by condition.

7. Trees, landscaping and public realm: Some low quality trees are proposed to be removed but they are not considered worthy of retention. The proposal is likely to substantially improve on the existing situation with high quality street tree planting proposed and the wider landscaping strategy. Appropriate conditions are attached to ensure a high quality replacement tree planting, and landscaping scheme, is secured.

8. Environmental impact, sustainability and energy: The measures outlined by the applicant achieve the required improvement on carbon savings within London Plan policy, subject to conditions ensuring the scheme secures the measures outlined, and a carbon offset contribution is made in line with London Plan requirements.

RELEVANT SITE HISTORY

Main Stonebridge School Site and Open Space

16/0077 - **Granted**

Hybrid planning application comprising: Full planning permission for the demolition of the Former Adventure Playground; the construction of a two-storey building providing new nursery, assembly hall, reception and teaching facilities with first floor walkway connecting to the main school building; reconfiguration of Stonebridge Primary School's playground including the provision of two Multi-Use Games Areas and the erection of new perimeter fencing and the creation of 1.2ha of public open space with associated ancillary works ("Phase 1").

AND

Outline planning permission for the erection of an apartment block up to 6-storey's comprising up to 51 residential units (16x 1bed, 25x 2bed and 10x 3bed flats) and 246sqm of commercial floorspace (Use class A3) and car parking at ground floor at Stonebridge Open Space, Hillside, the reconfiguration of Shakespeare Avenue, access to the residential units and up to 22x 3-storey houses (use class C3) at Open Space, Milton Avenue with all matters reserved. ("Phase 2").

17/2912 - **Granted**

Variation of conditions 3 (Building Height of new school building) and 19 (Landscaping) of Deemed (Reg3 Councils own Development) reference 16/0077 dated 7 June, 2016, for Hybrid planning application comprising: Full planning permission for the demolition of the Former Adventure Playground; the construction of a two-storey building providing new nursery, assembly hall, reception and teaching facilities with first floor walkway connecting to the main school building; reconfiguration of Stonebridge Primary School's playground including the provision of two Multi-Use Games Areas and the erection of new perimeter fencing and the creation of 1.2ha of public open space with associated ancillary works ("Phase 1").

18/4943 - Granted

Approval of reserved matters (access, appearance, landscaping, layout and scale) pursuant to condition 1 of Variation of Condition application reference 17/2412 dated 7 September, 2017, relating to Phase 2 of the development (as outlined above).

A number of other applications have been submitted relating to the discharge of conditions of the approved scheme.

Stonebridge Primary School Annexe, Twybridge Way

16/0073 - Granted

Outline planning permission for the demolition of the Former Day Centre and erection of up to 55 units comprising of 15 x houses up to 3-storeys in height (use class C3), one apartment block comprising 5 x 1bed and 7x 2bed flats up to 5-storeys in height (use class C3) and one apartment block comprising 28x 1bed flats up to 5-storeys in height with an element of care (use class C3b) and a new one-way access loop road and on-street parking bays with all matters reserved (as amended).

12/2820 - Granted

Remodelling of the existing Stonebridge Centre, to provide a new educational facility to be used as an extension of the established Stonebridge Primary School. Works include the resurfacing and landscaping of external areas to provide a play areas, the installation of new fencing, new pedestrian gates and new doors to the existing building.

CONSULTATIONS

A total of 337 addresses were consulted on 21/12/2018, in accordance with statutory guidelines and the Council's Statement of Community Involvement. One objection has been received, raising the following issues:

- Further loss of social/ community facilities in place of private dwellings
- Lack of affordable housing within the development, in a location where it is required
- Increased pressures on local public transport and parking
- Increase in population density will result in increased crime and anti-social behaviour
- Proposals will only add to the gentrification of the local area, pushing up local house prices and forcing existing tenants out

Officer comments: The proposals would provide 100% affordable units and therefore objections raised on grounds of lack of this, and problems of gentrification, are not considered to be warranted. Similarly, the proposals would not involve the provision of private dwellings, and in providing homes for those with specific care needs, is considered to have a social and community benefit. Issues of transport/ parking provision and crime together with the loss off community facilities (the school annex) and provision on the main school site will be addressed in more detail within the relevant sections of the report.

Press Notice: 27/12/18

Site Notice: 18/01/19

Statutory/ External Consultees

Canal & Rivers Trust

No objection to the principle of development, however request suitable conditions relating to landscaping, lighting, and construction management given the site's relationship to the adjacent canal feeder.

Police Crime Prevention Design Advisor

No formal comments were received as part of the application, however it is understood that the proposal has been through a number of design improvements as a result of consultation with crime prevention designers prior to submission.

Local Lead Flood Authority

No objections as proposals will not increase any flood risks and by reducing the final discharge from the site, which will provide additional capacity in the existing drainage system. They will require final confirmation from Thames Water that they have adequate capacity in their drainage network.

Transport

Confirmed that the site has a PTAL of 3 (moderate accessibility).

No objections raised, subject to relevant conditions (as largely agreed under the previously approved outline consent) and the submission of the following:-

- (a) a S38/S278 Agreement under the Highways Act 1980 to: (i) construct the proposed loop road for the development including footways and parking bays, with minor amendments to include raised tables at the junctions with Twybridge Way and the northern bend in the road, removal of parking space 10 and a reduction in the size of the bicycle storage area close to the northern bend in the road to facilitate pedestrian access and an overrun strip at the southern bend in the road; (ii) construct 1.8m (minimum) width parking lay-bys with 2m (minimum) width footways to the rear along the Twybridge Road frontage of the site; and (iii) remove all signing, lining and guardrailing associated with the existing school use, together with all associated lighting, signing, lining and drainage and other ancillary and accommodation works and works necessary to statutory undertakers' equipment; and
- (b) submission and approval of a revised Residential Travel Plan with amended targets to be agreed by Brent Council;

Environmental Health

Environmental health supports the application subject to a number of conditions relating to internal noise levels, construction noise and dust and air quality impact. See detailed considerations section of report for further comments on these issues.

Sustainability Officer

No objections raised subject to conditions (see paras. 87-90 of detailed considerations for further details).

Thames Water

No objections subject to informatives.

POLICY CONSIDERATIONS

The following planning policy documents and guidance are considered to be of relevance to the determination of the current application. Planning applications are required to be determined in accordance with the development plan (inclusive of all below documents) unless there are material considerations that would warrant other considerations being reasonably made.

National

National Planning Policy Framework 2018

Regional

The London Plan consolidated with alterations since 2011 (March 2016)

Local

Brent Development Management Policies 2016

DMP 1 – General Development Management Policy
DMP 7 - Brent's Heritage Assets
DMP 8 - Open Space
DMP 9 - Waterside Development
DMP 9a - Managing Flood Risk
DMP 9b – 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
DMP 20 - Accommodation with Shared Facilities or additional support

Brent Local Development Framework Core Strategy 2010

CP 1 - Spatial Development Strategy
CP 2 - Population and Housing Growth

CP 5 - Placemaking
CP 6 - Design and Density in Place Shaping
CP 15 - Infrastructure to Support Development
CP 17 - Protecting and Enhancing the Suburban Character of Brent
CP 18 - Protection and Enhancement of Open Space, Sports and Biodiversity
CP19 - Brent Strategic Climate Change Mitigation and Adaptation Measures
CP 21 - A Balanced Housing Stock

Brent Supplementary Planning Guidance Documents

Brent Supplementary Planning Guidance
SPD1 Design Guide for New Development

DETAILED CONSIDERATIONS

Background/ context for re-development of the Day Care Centre

1. A report was considered by Brent Cabinet on 23rd February 2015 which set out the case for redeveloping two sites. The first was a site comprising Stonebridge Primary School in addition to open space along Hillside and Milton Avenue, and the other is the Former Day Care Centre on Twybridge Way, which is the subject of this planning application. The recommendation of this report was approved by Cabinet.
2. In October 2014, a new School Place Planning Strategy was approved, which established the need for a continuing programme of additional school places within the Borough. The plan was updated in November 2015 and identified a need to provide 23 additional primary forms of entry by 2018. The Strategy set out which schools were identified for expansion, and this strategy included Stonebridge Primary School.
3. The current permanent capacity of Stonebridge Primary School is 420. To meet additional demand, from Autumn 2012 the Stonebridge Primary School began accepting pupils in a temporary annexe building at Twybridge Way which has additional capacity of 180. The Former Day Care Centre is currently in use as the Stonebridge Primary School annexe (following planning application 12/2820 being approved).
4. The Twybridge Way site currently contains bulge classes which will be relocated to the expanded main school building at the Stonebridge Primary School (Phase 1), which was approved as part of hybrid planning application 16/0077 and the subsequently approved minor material amendment application 17/2412. The approved school expansion will allow the 180 off-site pupils to be accommodated within the main school site, and the 3-form entry will allow the school to increase its pupil intake from 600 to 630.
5. The approved redevelopment of the Stonebridge Primary School Site will enable the school to accommodate the bulge classes currently accommodated at the Former Day Centre at Twybridge Way, in turn releasing this site for residential development.
6. An outline application was granted permission in June 2016 for the demolition of the day centre and the erection of 14 three-storey townhouses and one 5 storey apartment block fronting Hillside comprising 13 units (Use Class C3), and a further five-storey apartment block fronting Hillside to provide New Accommodation for Independent Living (NAIL) accommodation with an element of care (Class C3b), comprising of 28 x 1bed units (ref. 16/0077).
7. A full application is now submitted to account for the proposed uplift in the number of NAIL units from 28 to 40, and some minor alterations to the unit mix within the traditional housing offer (see paras. 9-10).

Principle of development

Residential mix and affordability

8. The proposed scheme is for a total of 67 residential units, which represents an uplift of 12 units from the 55 which were approved under the outline permission in June 2016. It should be noted that because of this increase, a new full application has been submitted, rather than a reserved matters application subsequent to the previous outline consent.
9. The proposed mix of units, and comparison with the extant outline approval, is set out as follows:

	Studio (NAIL)	1-bed (NAIL)	1-bed (flat)	2-bed (flat)	3-bed (House)	4-bed (house)	Total
Previous outline consent	0	28	5	7	14	1	55
Proposed scheme	40	0	4	9	10	4	67

10. There would remain a total of 27 units of traditional Class C3 housing within the development, which is the same number as approved under the previous outline consent. The only alteration to the overall unit mix sees the number of three-storey family-sized houses reduced from 15 to 14, with a corresponding increase in the number of apartments from 12 to 13. The scheme continues to provide a good overall mix of 1, 2, 3 and 4 bed units, and therefore complies with policy CP21 of Brent's Core Strategy.

11. Significantly, the review of the scheme has also resulted in 100% of the units being provided as affordable rent, and would all be made available at a social/ affordable rent. This is clearly welcomed, and subject to a condition ensuring that all 67 units are retained as affordable rented accommodation in perpetuity, would accord with Policy DP15 of the Local Plan.

Justification for NAIL accommodation

12. The inclusion of C3b residential accommodation is a result of Brent Council's Adult Social Care (ASC) and Housing departments' New Accommodation for Independent Living (NAIL) scheme to develop Extra Care and supported living accommodation in order to provide alternatives to residential and nursing care homes. Extra care housing is based on the idea of independent and self-contained accommodation but with on-site access to care and support services for a range of people with varying needs such as learning disabilities, mild to moderate dementia and physical disabilities. There is an identified need for more of this type of accommodation with the Borough, and its delivery on site would meet a key corporate objective.

13. The scheme has been reviewed since the outline permission granted in June 2016, with the Council's ASC team seeking to support the needs of more vulnerable tenants requiring on-site support, and for residents with dementia. On this basis, an appropriate staff to resident ratio is required to provide a more cost-effective service. This has resulted in a proposed uplift of NAIL units from 28 to 40 within the specified block. This is considered acceptable, and would not compromise the overall quality of the units provided, which would still meet minimum GIA requirements at 39 sqm per flat. This would be restricted to use as C3b residential accommodation through condition.

Layout

14. The site layout is dictated to a large extent by the loop road arrangement and the need to be sensitive to neighbouring residential uses, which accords with the previous outline consent. Once again, the taller five-storey flatted blocks are sited at the southern end of the site, directly fronting onto Hillside. The proposed building heights then step down to the three-storey townhouses on the northern part of the site, to reflect the existing houses along Twybridge Way to the north and west. The blocks along Hillside will retain a generous set back of approximately 6.5m, which is commensurate to the existing building line and the siting of these blocks respond appropriately to the existing streetscape.

15. To the rear of the taller elements is the internal loop road, semi-detached and detached houses are arranged fronting onto this. Two of the houses are proposed to front directly onto Twybridge Way which will reinforce the street frontage along this section of the road. The detached house proposed within the centre of the site directly faces the rear elevation of the frontage blocks, with a separation of 17m provided. Brent's SPD1 usually seeks a separation of 18m between facing elevations, however it is oriented in such a way that it would not provide any direct overlooking from proposed openings into the blocks to the immediate south, nor to any of the adjoining new dwellings. The pattern of development relates well to the local prevailing context, which is characterised by terraced and semi-detached houses further along Twybridge Way.

16. It is also important to note that the existing detached building which has been subdivided into 4 units which fronts onto Twybridge Way, known as 'The Cottage' will be retained within the centre of the site. This has been included on the proposed site plan, but is not within the demise of the application site. The proposed development will involve new townhouses being built to the immediate north, east and south. Separation distances between facing elevations will range from between 12.5m to 23m, across the width of the internal access road. However, again the orientation of the proposed townhouses ensures that direct overlooking

would be kept to a minimum. On balance, this is considered to be an appropriate site layout that achieves suitable separation between existing and proposed buildings within the site.

Scale, height and massing

NAIL accommodation and C3 block

17. The overall scale, height and massing of the proposed development is in accordance with that previously approved under the outline consent in June 2016. The key design rationale is the creation of a linear 'façade' facing onto Hillside to the south of the site, incorporating the part-four, part-five storey C3 apartment block and the five-storey block for NAIL accommodation.

18. As with the previously approved outline scheme, the proposed heights are considered appropriate within the local context. Four-storey blocks are established directly opposite on the south side of Hillside, as well as to the immediate east. Further to the east are examples of development of between 4-6 storeys, and in this context the proposed five-storey block of NAIL accommodation is considered to remain in keeping.

19. The four and five-storey apartment block will be located on the junction of Twybridge Way and Hillside, with the change in height helping to mediate the contrasting context between the taller developments on Hillside, and the three-storey townhouses which step up the natural slope northwards toward the canal feeder. The differentiation in heights also helps to break up the overall massing of this block, which is further aided by the presence of large inset terraces to the south-western corner, and the presence of additional windows to living areas of individual apartments along this elevation.

20. The NAIL accommodation block will sit to the immediate east, and has an 'attic' storey which is set back from the main façade, reducing its visual impact and apparent height when seen from Hillside. Although it has a strong horizontal emphasis, this is articulated by the presence of a deep re-entrant adjacent to the internal lift lobbies to the south elevation. To the north, the staircase is articulated and clad in bronze to break up the continuous façade, and ensuring this would not become visually overbearing.

Three-storey townhouses

21. As outlined above, the proposed townhouses will be located to the north of the site and mediate between the larger apartment blocks on Hillside, and the predominantly two-storey terraced dwellings along Twybridge Way. The townhouses are arranged as semi-detached pairs or detached pitched roof buildings, successfully breaking up their overall scale and massing, particularly to the eastern elevation where the rear elevations of seven of the 14 townhouses face onto properties on Canal Walk.

22. The townhouses are designed to appear as two main storeys with roof accommodation in the form of dormer extensions which would be street-facing, which is an appropriate response to the local context. Again, this also reflects the height of the buildings approved back in June 2016, albeit one additional townhouse is now proposed. However, the overall scale and massing of the proposed townhouses will remain acceptable.

Architecture and materiality

NAIL accommodation and five-storey flatted block

23. A high-quality palette of materials is proposed. The proposed flat and NAIL buildings will predominantly be constructed from brick, which will be warm red/buff in tone with tinted mortar pointing. Copper bronze coloured cladding panels are proposed to break up the facades and add visual interest. At the roof level of the C3 apartment block, a translucent glass balustrade is proposed, enabling the roof to be utilised as communal amenity space.

Three-storey townhouses

24. The townhouses are proposed to be three storeys in height, with the third level of accommodation within the proposed pitched roof. The houses will predominantly be of light buff brick construction, with tinted mortar pointing. The brickwork of the houses is designed to be lighter in tone to contrast with the brickwork used for the flat and NAIL buildings, complementing these buildings rather than seeking to compete with them. The roof is to be constructed from blue/black slate with minimal eaves and verge overhangs.

25. In terms of window fenestration, this would be a simplistic combination of fixed and opening sections, providing as much natural ventilation as possible. Powder coated aluminium and timber sections would be

used, which is considered to ensure a high quality, sustainable finish.

26. Overall, it is considered that the architecture and materials used would be of a high quality, reflecting the local vernacular as much as possible and ensuring the buildings will be robust and sustainable for the needs of future occupiers. A condition will require that material samples are presented to the Council prior to their use within the construction, to ensure that the final appearance is of an exceptional standard and in line with what has been set out in the proposed scheme.

Standard of accommodation

Minimum floorspace standards

27. A schedule of accommodation has been submitted with the application, which demonstrates that all 3- and 4-bedroom dwellinghouses would be 122sqm and 124sqm respectively, thereby meeting the minimum GIA standards set out within the London Plan. All dwellings would be provided with sufficient internal storage space, and would meet all requirements of the Technical Housing Standards.

28. Similarly, the 13 1-bed (2p) and 2-bed (3p) units within the five-storey apartment block would meet the minimum GIA standards, with sufficient provision of internal storage space and all other requirements of the Technical Housing Standards being complied with.

29. The 40 units provided as NAIL accommodation would be provided as studio apartments, with a GIA of either 39sqm or 40sqm, which is acceptable. The units are supported by communal facilities at ground floor, including a 40 sqm multi-purpose room for residents to socialise and relax, as well as a therapy room, central laundry room and storage rooms, which is considered sufficient to provide a good quality of accommodation for future occupiers. Ancillary staff facilities are also provided at ground floor level, and are also considered of sufficient size and quality to meet the needs of this particular use.

Daylight

30. An Average Daylight Factor (ADF) test has been carried out for the new dwellings which identifies that 93% all kitchens and living rooms, and 100% of all bedrooms, across the development will pass relevant BRE standards for good average daylight levels throughout the year. A number of kitchens fall below minimum requirements, which is largely down to being overshadowed by adjacent buildings, and these rooms being set deep into the building, which is not uncommon.

31. An Annual Probable Sunlight Hours (APSH) test has also been carried out for the new dwellings, testing all rooms that have windows within ninety degrees of due south. The test identifies that 92% of all rooms within the development would achieve minimum BRE standards, which is considered to be a very good overall proportion.

32. The BRE guidance recommends that at least half of amenity space within a development receive at least two hours of sunlight on the 21st March. The applicant's overshadowing diagrams confirm that the majority of amenity spaces (approx. 92%) will achieve this which is welcomed, particularly in the highly urban surrounds. Where this is not met, this is largely down to north facing gardens to some of the proposed townhouses.

Cooling and overheating

33. An overheating report has been submitted as part of the Energy Strategy, which includes the results of internal heat level modelling. The Mayor's London Plan seeks to avoid overheating and excessive heat generation within Policy 5.9. The heat modelling identified solar gain as a major factor which would contribute to overheating and potentially uncomfortable living conditions for residents in this development, and particularly for those in the NAIL apartments. In order to mitigate this, MVHR (mechanical ventilation with heat recovery) will be provided during winter months to reduce heating demand, while this will have a 'bypass' mode during summer months, allowing ventilation without heat recovery. The limited heights of the proposed buildings mean that fully openable windows/ balcony doors can provide satisfactory cooling to the dwellings.

34. However, the sensitive nature of the NAIL apartments means that additional cooling via air source heat pumps is proposed, through the underfloor heating network. This is considered reasonable and will ensure additional needs of these occupiers are met.

Layout and Outlook

35. The residential units within the development are considered to be of an excellent standard. Focusing firstly on the three storey townhouses, these will all benefit from a dual aspect and will have access to a private rear garden of 50 sqm. These are accessed directly from the dwelling and from side passageways, accessible from the street. Each of the townhouses also has an area of defensible space, set back from a clearly defined front boundary.

36. Similarly, 100% of units within the proposed five-storey apartment block will be at dual aspect, with those to the south of the block enjoying a triple, and predominantly south/ south-westerly aspect. The two ground floor units provide an active frontage and small rear gardens, with communal refuse and cycle storage also accessed from the loop road. At upper floors, 3 flats are provided per floor, around a centralised stair core and lift. All main habitable rooms (bedrooms and living rooms) will have access to natural ventilation and aspect.

37. With regard to the NAIL accommodation, all 40 apartments would be dual aspect, with intermediate flats having secondary windows onto the main internal circulation lobby. All corner apartments (25% of the total number) would have true dual aspect, i.e. with windows facing onto adjacent facades. All apartments have been designed to have main living areas looking onto streets/ residential footpaths, thereby meeting the needs of residents with onset dementia, who benefit from street/ public interaction as much as possible.

38. The internal layout is simple and legible, with all support and communal facilities arranged along the north side of the building at ground floor level, and individual apartments facing south. The communal dining/ social space is south-east facing, and links directly with the main communal landscaped garden for easy access and enjoyment.

39. The development has secure entrances in locations which are overlooked so as to maintain security, maximising active frontages and ensuring a good level of natural surveillance. The units are all considered to be logically laid out and would have good outlook in line with SPD1 standards. The tightest relationship to neighbouring properties is found to the north and east of the site, where the rear facing windows of townhouses 08 and 09 would be less than 15m of the rear elevation of Nos. 4 and 5 Canal Walk. However, views would only be possible at an angle, rather than the rear elevations directly facing each other, and so very little of these rear window openings would be apparent. Furthermore, the townhouses are designed to have single aspect bedrooms within the loft space, meaning aspect to these rooms would face away from these rear gardens, reducing any overlooking impacts.

40. There are also no directly facing windows within the development, with the only close relationship being between windows to the south-western corner of the apartment block at all levels. In these instances, the openings serving the main living space at ground floor level (Unit P.00.01), as well as the private amenity space to this flat, would be within 7m of the secondary bedroom window to Unit P.00.02. However, any views would be at an oblique angle and would also be largely screened by balustrading and planting at this level (exact details to be secured by condition).

Accessibility

41. As outlined above, all 40 NAIL apartments will be fully wheelchair accessible to meet the particular care requirements of future residents. All communal and support facilities at ground floor level would also be DDA compliant, and the block is served by DDA compliant lifts.

42. The five-storey block of apartments is also served by a lift, with all ground floor terraces and integral balconies on all upper floors directly linked with level access from living areas. All units would be designed to be accessible and adaptable. Similarly, all 14 townhouses would be designed to be accessible and adaptable, meeting the requirements of Building Regulation M4(2).

43. A condition is attached to ensure the units are provided in accordance with the above, prior to occupation of any of the accommodation.

Amenity Space and Play Space

44. Each family house includes over 50 sqm of private amenity space in the form of rear gardens, meeting Brent's amenity space standard requirements.

45. For the corner block of flats, all units include private amenity space in the form of ground floor terraces and upper floor balconies. In addition, communal amenity space is located both at ground and roof top level. At least 20 sqm of amenity space would be provided for each unit within this block, therefore meeting SPD1

requirements. The ground floor communal amenity space would also be located close to the rear gardens and windows of the two flats at this level; it is therefore considered reasonable to attach a condition requiring details of appropriate screening between these spaces to ensure there would be no harm to future resident amenity.

46. For the NAIL building, it was a specific requirement of the LB Brent to not provide flats with balconies, due to these being considered as inappropriate for the targeted residents. Instead, generous communal amenity space is distributed across each floor, together with a communal garden, totalling to 855 sqm. This works out as approx. 21 sqm per unit, which again meets Brent's minimum requirements.

47. Although there is no specific play space provided on this site, this must be seen in context with the generous amounts of private and communal amenity space overall (including large rear gardens to all family sized units). It is also important to note that public open space exists directly opposite the site, with the entrance to Stonebridge Recreation Ground being 20m away on the southern side of Hillside. This is easily accessible for future residents of all units on this site.

48. A new children's playground was also approved as part of the Phase 1 works (see 16/0077). The shortfall in play space is also to be expected given the constraints of the site and the generous provision of private gardens to the family-sized homes.

Impact on neighbouring residential amenity

Daylight and sunlight

49. The applicant has submitted a daylight, sunlight and overshadowing analysis of the impact of the development on surrounding properties, utilising the recommendations set out in the BRE 'Site layout planning for daylight and sunlight - a guide to good practice (2011)' document. The analysis concludes that there will be no material harm to adjoining occupiers as a result of the proposed development. An initial façade assessment identified the following neighbouring properties as in need of a full, detailed analysis in terms of daylight and sunlight impacts:

- 153-157 Hillside (immediately to the south of the site);
- The Cottage, Twybridge Way;
- 1-5 Canal Walk (denoted as 'West End Close Building C' within the report) and 33-40 West End Close (denoted as 'Building B')

50. With regard to daylight impacts, the assessment concludes that there would be a marginal adverse impact on some of the ground floor rear facing windows at Nos. 33-40 West End Close, with the Vertical Sky Component (VSC) reducing by 24% as a result of the proposed development. However, it is noted that the VSC to these windows after development would remain at 29%, which would be deemed acceptable for any new building. The remainder of the windows to this block would be materially unaffected, and therefore on balance it is considered that any daylight loss would be acceptable.

51. In addition, there would be some material loss of daylight experienced to the ground floor windows of The Cottage. It is considered that some loss of daylight has to be expected given where the dwelling sits in context with the site. However, The properties within Cottage benefit from being dual aspect, and it is considered that the layout and orientation of the new development immediately next to it does limit daylight loss to an absolute minimum. Although on window appears to be single aspect and would experience a noticeable loss of daylight, the overall impact on the living conditions of this property would not be excessive. On balance, officer consider that any loss of daylight would be acceptable. It is also important to note that the scheme is in line with the scale and heights of buildings which were approved as part of the previous outline consent in June 2016. Furthermore, the benefits of the application overall would far outweigh the harm to the most affected neighbouring properties, which is considered to be limited overall.

Privacy and outlook

52. The impact on neighbours is a significant consideration, and policy DMP1 seeks to ensure that any impact in terms of loss of privacy and outlook to neighbouring residential occupiers is kept to a level which would not materially harm their amenity.

53. The established buildings to the immediate north are Nos. 12-18 Twybridge Way (evens), which are two-storey residential dwellings. To the immediate east are Nos. 1-13 Twybridge Way (odds), which are also two-storey residential dwellings. To the west are Nos 1-5 Canal Walk (inclusive), and a four-storey residential

block containing Nos. 33-40 West End Close.

54. The overall layout and orientation of the proposed buildings within the site has been designed with separation (and therefore overlooking) distances to surrounding properties in mind. The tightest relationship is found to the east of the site, where the distance between the rear façades of townhouses 08 and 09 and the rear façade of Nos. 4-5 Canal Walk is a minimum of 11 metres. However, the townhouses have been designed so that rear facing windows would not directly face onto openings opposite on Canal Walk, and at second floor level, will create single aspect bedrooms with rear rooflights, thereby ensuring any overlooking is minimised. On balance, this relationship is considered acceptable.

55. It is also acknowledged that separation distances maintained to The Cottage will be below those normally recommended within SPD1. The Cottage appears to contain flats that have with dual aspect layouts and amenity space surrounding the whole building. As detailed above, some loss of amenity has to be expected to this dwelling given its location within the context of the site. However, townhouses 12, 13 and 14 (approx. 5m to the south of the Cottage) have been designed so that they would have no windows directly looking onto the south elevation of the Cottage. While the residential gardens of these dwellings would be in close proximity, officers consider that sufficient boundary screening (controlled by condition) can be introduced to ensure there is no material loss of privacy to the adjoining occupiers. Therefore the proposals siting would not result in an adverse impact on the overall living conditions of the occupiers of the Cottage.

Transport and highways

56. This application follows a previous outline permission (ref: 16/0073) for a similar proposal to redevelop this site, but with a larger block of 40 NAIL flats now proposed and a slightly different mix of residential accommodation. Access and parking arrangements remain essentially unchanged, although these were only provided at outline stage and precise details have been provided at this stage.

Car parking

57. Since previous comments were made on the outline scheme, amended car parking allowances for residential use have come into effect through the adopted DMP 2016. As the site does not have good access to public transport services, the higher residential allowance set out in Appendix 1 applies. However, the proposed provision of 28 parking bays within the site accords with maximum allowance of 40 spaces under Appendix 1.

58. Policy DMP12 also requires that any on-street parking that is generated can be safely accommodated though. In this case, Twybridge Way is not heavily parked, but has a narrow carriageway that cannot accommodate parking on-street along both sides. As a result, parking bays are marked along the wide footways along either side.

59. This application includes the re-provision of the parking bays along the Twybridge Way site frontage within a lay-by, in order to provide additional on-street parking along the site frontage. Revised drawings have been submitted which show these spaces as lay-bays at a minimum 1.8m width set into the existing footway at carriageway level, with a minimum 2m wide kerbed footway to the rear, and 6m in length. This satisfies initial concerns raised by the highways officer.

60. Within the loop road, two disabled parking spaces have been shown, as well as a minibus/ambulance space. A wide 12m long space has been indicated to the front of the care accommodation for ambulances, although it should be noted that it will not be able to be reserved for exclusive use for minibuses/ambulances by the care home if the estate road is to be adopted as public highway. Disabled spaces can be provided along the new street as and when requests for bays are received.

Cycle parking

61. The London Plan requires a secure bicycle parking space for each 1-bed flat and two spaces for larger flats, plus one space per 20 flats and one space per five staff for the care home.

62. Each of the proposed houses is shown with a secure bicycle store for two bikes within its private garden space. A further small external store for four bikes is shown for the care home, whilst an internal storeroom for 22 bikes on a double-height storage rack is proposed within the block of 13 flats. The overall number of spaces, and quality of storage, meets London Plan requirements. A further bicycle storage area for 10 visitor spaces is shown alongside the access road. A condition will be attached to ensure the cycle storage is provided across the site before the development is occupied.

Refuse storage

63. Adequate internal bin storage for the flats and care home is proposed to the front of each block, allowing easy access by refuse vehicles from the proposed loop road. Each of the houses is also shown bin storage areas within their front gardens. Again, this will be secured by condition.

Vehicular access and servicing/deliveries

64. Access through the development is again proposed via a 4.8m wide loop road with parallel and echelon parking bays along its length, meeting Twybridge Way in two locations with 4m kerb radii at the junctions. The proposed width of the road is appropriate for this level of development and the alignment, with two sharp bends, will keep vehicular speeds low. Tracking has been provided for the two bends to demonstrate that refuse vehicles and fire appliances can negotiate the site, which is fine.

65. Highways officers raised concerns with the ability of larger vehicles, such as pantechnicons, to manoeuvre around the southern bend on Twybridge Way. Revised drawings have been received showing an over-run strip on the inside of the loop road, closest to the NAIL units, to aid movement, and officers consider this acceptable. Additionally, plans have been revised to include raised entry tables and tactile paving at the junctions with Twybridge Way.

Pedestrian access

66. Revised drawings have been submitted showing the removal of a parking space nearest the northern bend of the loop road (closest to the Cottage) to allow a continuous footway around the inside of the northern bend in the loop road. A 450mm kerbed margin has also been shown to the third party fence to prevent potential future damage by passing vehicles.

67. The works to construct the new access road and to create the on-street parking lay-bys will need to be carried out via an agreement under Sections 38/278 of the Highways Act 1980 and offered to the Transportation Unit for adoption as public highway, which is to be secured separately. The design will also be subject to a Safety Audit (which may well also pick up on the matter of the protruding fence and its impact on forward visibility and pedestrian routes). The works must also incorporate the removal of all signage and lining associated with the school, including zig-zag markings (with associated sign), guardrailings and advance school warning sign (on lamp column 8 on Twybridge Way).

Wider transport impacts and trip generation

68. A revised Transport Assessment has been submitted to support this amended application. In terms of traffic impact, the additional NAIL accommodation is estimated to add one extra vehicular trip in each peak hour, thereby increasing total vehicular trips for the development to 6 arrivals/8 departures in the morning peak hour (8-9am) and 6 arrivals/7 departures in the evening peak hour (5-6pm).

69. The operation of the Twybridge Way/Hillside junction was assessed in the previous Transport Assessment for the outline scheme and was found to operate well within capacity. The addition of one extra vehicle in each peak hour would not alter that conclusion.

70. As before, the revised Transport Assessment has not provided any assessment of likely future trips to and from the site by non-car modes of transport, but a Framework Residential Travel Plan has again been produced to help to manage travel to and from the site by non-car modes of transport, even though the development in itself falls below TfL's threshold for production of a full Travel Plan.

71. The Travel Plan sets out a large range of measures to provide information, support initiatives and provide incentives to try to influence future residents to make more use of sustainable modes of transport. These include the supply of travel information through Travel Packs, Noticeboards and Personal Travel Planning, promotion of the health benefits of walking and cycling, establishment of a Bicycle Users Group, provision of vouchers towards bicycle or equipment purchase, promotion of public transport services, car sharing and home shopping and management of on-site parking.

72. A Travel Plan Co-ordinator is to be employed for about 70 hours in a year to manage the Travel Plan, with progress towards targets monitored on a biennial basis. The main target will be to reduce the proportion of journeys to and from the site made by car drivers from an initial estimate of 47% down to 35% over the course of five years.

73. However, no basis for the baseline of 47% has been provided and with data from the 2011 Census suggesting that only 31% of journeys to work in the area are made by car, the baseline figure is not considered to be realistic. Revised targets therefore need to be agreed before the Residential Travel Plan can be accepted, which can be reviewed once the first survey is undertaken. Nevertheless, the development is relatively small scale, so once the targets have been agreed, the implementation of the Travel Plan can be simply secured by planning condition.

74. Finally, the previous examination of the road accident history for the area has been updated to the five year period ending December 2017. This did not show any accidents in Twybridge Way, but did show a large cluster of 16 accidents in the vicinity of the junction of Hillside and Twybridge Way and the zebra crossing to the west, including four involving pedestrians, four involving motorcyclists and six rear end shunts. Highways officers recommend that improving highways safety (such as improved lighting, crossings etc) in the area should be a focus for CIL contributions arising from the approved scheme. However, it is important to note that the development of the site for residential purposes would not materially worsen the situation, and the application is acceptable in terms of transportation on this basis, albeit officers note the request of the highways team.

Environmental health considerations

Air Quality

75. An air quality assessment considering the impacts of the proposed redevelopment of the site on air quality has been submitted, and this has been reviewed by Brent's regulatory services team.

76. Following revisions which addressed some concerns about air quality mitigation measures, it is considered that the assessment is acceptable. The report concludes that ground floor flats within the five-storey block would require some mitigation measures installed to ensure that the air quality levels externally do not impact on the future residents. The works include glazing that will ensure a sealed fitted unit, as well as mechanical ventilation system to be installed to ensure that clean air is provided to the flats. A condition is attached to ensure that the mitigation measures are installed prior to occupation of any units.

Noise

77. A noise impact assessment considering the noise impact on the residential units has been submitted as part of the proposal.

78. The report shows that the tested surrounding environment results generally in a low to medium noise level for the proposed townhouses, whereas there would be some higher noise levels with the NAIL and residential apartments. This is due to the presence of road traffic, proximity to the railway line and other localised noise sources, and requires a robust glazing and ventilation scheme in the most affected areas.

79. The findings of the testing necessitate the provision of acoustic design mitigation measures to prevent potential adverse impacts. The acoustic design measures proposed are as follows:

- High performance, sound insulating glazing within all windows.
- Mechanical ventilation systems with high outside to inside sound insulation performance.

80. The report ultimately concludes that planning permission should not be rejected on the grounds of noise and that the measures proposed would improve sound impact to within acceptable levels.

81. Brent's regulatory services team have reviewed the noise impact assessment in detail. Officers recommend a condition requiring the development to achieve the relevant British Standard for sound insulation and noise reduction. A condition is also recommended requiring all plant installed on the development to not exceed 10dB(A) below the background noise level when measured at the nearest noise sensitive premises.

82. These conditions are considered reasonable and the LPA will also impose a condition requiring that the scheme of noise insulation measures within the acoustic/noise report are adhered to throughout the development in achieving the relevant British Standard for sound insulation and noise reduction.

Construction Management

83. A construction management plan has not been provided with the application. Brent's regulatory services

request that a condition requires such a report to be submitted and approved prior to commencement of the development (including demolition).

Contaminated Land

84. A contaminated land ground investigation report has been submitted. The report draws a number of geotechnical engineering conclusions and makes recommendations relating to processes of site excavation, foundation solutions, gas protection and subsurface concrete to mitigate the potential for soil contamination.

85. In reviewing the application, Brent's regulatory services do not object to the methodology or recommendations within the report. A condition will therefore require that the recommendations within the ground investigation are adhered to throughout construction.

Lighting

86. An external lighting report has been submitted with the application and also reviewed by Brent's regulatory services team. There is some concern that levels of illuminance immediately outside the residential properties would be high, at approx. 10 lux. Officers therefore recommend a condition requiring details of the height, type, position, angle and spread of any external lighting to be submitted for approval, prior to any of the units being occupied.

Sustainability and energy

87. A detailed Energy Strategy and Sustainability Statement have been submitted with the application.

88. The proposed regulated development with 'Be Lean', 'Be Clean' and 'Be Green' measures incorporated is confirmed to emit 51,200kg of Carbon Dioxide per annum. This equates to a 35% 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 £51 per tonne per annum. This payment will be secured through the Section 106 agreement.

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

Be Lean (total savings within the dwellings from 'be lean': 9,700kg / 12%) - Using building fabric which significantly improves on the thermal performance of a building regulation compliant building.
- The use of passive design measures including oversailing balconies to reduce solar gains during summer, and increased solar gains during winter.

The use of lighting controls measures is proposed to save energy relating to lighting.

The use of mechanical ventilation with heat recovery.

NAIL communal areas to be naturally ventilated where possible.

Be Clean (total savings within the dwellings from 'be clean': 0kg/ 0%)

- It has been explained that the baseload heat demand is not sufficient to support the installation of a site wide heating system or combined CHP engine

- Provision of gas condensing boilers for heat supply

Be Green (total savings from 'be green': 18,000 kg / 23%)

Review of air source heat pumps, wind turbines and photovoltaics.

Considered that PV panels were most appropriate in the context of this development, although a centralised air source heat pump system is also under consideration for the NAIL units

Anticipated that a total of 200 sqm of PV panels will be installed across the site, all utilising south facing roof spaces to the townhouses and the main flatted block.

90. The council's sustainability officer has been consulted on the proposals and, following revisions and clarification of the presence of mechanical ventilation, as well as the efficiency of the PV panels, is satisfied that the proposals would meet the 35% target for on-site reduction in carbon emissions without the need for a CHP system to be installed.

Trees and landscaping

91. The existing landscape contains four groups of semi-mature and mature Category B and C trees, which are predominantly sited parallel to the canal feeder footpath to the north of the site, and along the Hillside frontage. A further 35 individual trees have been identified by the arboricultural survey submitted with the

application. The proposed development envisages the removal of 31 of the 35 individual trees and the four main groups, with mitigation proposed in the form of a replacement tree planting strategy.

92. No category A trees were identified on the site. In addition to the tree survey, a tree protection plan and arboricultural impact assessment have been submitted. The report makes the following key recommendations:

- Trees T2 and T34 to be retained, with any necessary excavation within the RPAs of these trees to be carried out using hand operated machinery and protocol set out within the agreed protection method statement
- Tree T10 to be retained, with RPA protected using Heras type fencing for the duration of the construction process. All excavation necessary within RPA to be carried out using hand operated machinery. All other machinery to be used outside of the RPA at all times, and all construction materials to be stored outside of the RPA
- Prior to set up, all trees to be removed to be felled and removed in accordance with British Standard BS3998:2010. A further tree pruning specification may be provided to deal with trees conflicting with the proposed development
- The installation of heras type mesh panel to be carried out in accordance with the tree protection plan and as per British Standard BS5837:2012 Figure 3a
- Appropriate ground protection (ie. Trakmat) used locally where appropriate in connection with tracking of a small machine within the RPA of protected trees
- If tree roots discovered during excavation process, roots up to 25mm to be cut back using hand held tools, except where they occur in clumps. Roots of over 25mm diameter, or in clumps, shall be severed only after consulting the qualified arboriculturalist on site, or LPA tree officer
- All new development should be outside of RPA's and where development is proposed within RPA's of trees to be retained it must be constructed in a way that damage of the trees root system or crown be avoided.

93. The arboricultural strategy is in line with what was previously approved in June 2016, and has evolved to include a detailed replacement tree planting strategy. The previous scheme identified trees of considerable amenity value (T30 - Sycamore) located on the south west corner of the site, and T28 and T29, both mature Leyland cypress which would be affected by the building footprint. These would be inappropriate for retention in such close proximity to the proposed building.

94. In view of the site circumstances, it is considered there are only 3-4 trees along the southern boundary worthy of retention, none of which are considered to be of sufficient quality to dictate the layout of development on site. None of the trees on the western boundary, or within the site itself are considered to be of particular merit and the details submitted of replacement tree planting indicate that these would be of a high quality, making a positive contribution in terms of visual amenity to future occupiers of the development and ensuring the amenity of surrounding residents is enhanced.

95. An outline landscape strategy has been developed. The landscape design proposes an integrated soft and hard landscape setting for the residential development. Crucially, a new line of tree planting will take place along Hillside to the south of the site, ensuring a green frontage is maintained and providing important natural screening from noise and air pollution to future occupiers. The new loop road to the centre of the site will also be tree lined, with new trees also proposed to the rear of the townhouses to the north and east of the site.

96. A full landscaping strategy will be requested by condition, including further details of species and precise specifications of tree layout and all areas of hard and soft landscaping, both to public areas and communal amenity space within the development.

Flooding and drainage

97. The site falls 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. The report also outlines a drainage strategy for the site which would significantly reduce surface water discharge rates of the site from their existing levels, in line with the requirements of London Plan policy 5.13. The developer will achieve this by providing rainwater storage tanks and suitable sustainable urban drainage (SuDS) measures which will result in a reduction in the existing rate of discharge to the sewage network.

98. The document has been reviewed by Brent's Local Lead Flood Authority and it is confirmed that the approach to flood risk and sustainable drainage for this development is acceptable and in line with Brent and

London Plan standards. A condition will require that the measures as outlined in the flood risk and drainage assessment are adhered to throughout the development.

99. Thames Water has also reviewed the application and have identified, following initial investigations, an inability of the existing surface water infrastructure to accommodate the needs of this development proposal. Therefore, they have recommended a condition requiring further details of a phasing plan, approved by Thames Water, to be agreed before any works commence on site.

100. Thames Water has also provided information relating to the requirements for connecting the development to the public sewer, minimising groundwater discharge during construction, installing fat traps and petrol / oil interceptors. This information will be communicated to the applicant by way of informative. Thames Water confirm that they have no objection to the application in terms of sewerage infrastructure capacity.

Impact on Grade II Site of Importance for Nature Conservation Value (SINC)

101. The existing canal feeder to the north of the site is designated locally as a Grade II SINC, and a wildlife corridor. The feeder connects the River Brent to the Grand Union Canal. The proposed development does not encroach into the designated corridor.

102. The Canal and River Trust (CRT) have been consulted on the application and reviewed relevant documents, in particular with regard to the relationship of the townhouses along the northern boundary of the site which would sit adjacent to the canal feeder. No objections have been raised by the CRT, subject to a condition requiring further details of the proposed hard and soft landscaping scheme along this northern boundary of the site be submitted to and approved in writing in consultation with them. A further condition is attached requiring the approval of all external lighting prior to occupation of the townhouses.

103. Subject to these conditions, it is considered that the proposals would have a neutral impact on the SINC.

Ecology

104. The application includes an ecology report to consider the potential ecological impacts of this development, and in particular its relationship with the canal feeder, which is a Grade II SINC, as referred to above.

105. The report concludes that the canal feeder currently supports nesting birds within the trees and shrubs, and there is also evidence of hedgehogs based on desk studies. In addition, although there was no evidence of roosting bats and badgers within the site, the canal feeder could support such habitats.

106. In order to comply with relevant legislation, the report recommends that removal of the trees and shrub should ideally be undertaken outside of the breeding season (generally thought to be March-August) or a nest search should be undertaken by an ecologist immediately prior to works commencing.

107. The report identifies opportunities to enhance and improve the ecology of the site post development. This enhancement could be achieved through:

- Implementation of a landscape scheme that incorporates both native and wildlife friendly plant species.
- The inclusion of hedgehog passes under any fence lines to allow connectivity between the site and the surrounding area.
- The use of log piles from wood from felled trees to create suitable habitats for hedgehogs, herpetofauna and invertebrates
- The provision of a small water feature to provide suitable habitats for common amphibians, as well as a safe source of water for wildlife
- The installation bird and bat boxes within the future development, which could be integral boxes within the walls of the altered structures.

108. In addition, green and/or biodiverse roofs will be installed where possible on the upper levels of the building. The applicant confirms that the planting scheme will contain native flora and fauna and the final details of the landscaping will be secured by condition.

109. A condition will require that the ecology report recommendations are adhered to throughout development.

Conclusion

110. Officers consider that the scheme meets planning policy objectives and is in general conformity with local, regional and national policy. The proposal would make a positive contribution to the area, whilst having an acceptable impact on and relationship with the existing surrounding development. Officers recommend the application for approval subject to the conditions and obligations set out in this report.

CIL DETAILS

This application is liable to pay **£1,391,829.46** * 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): 1422 sq. m.

Total amount of floorspace on completion (G): 5417 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	5417		3995	£200.00	£0.00	£1,152,129.46	£0.00
(Mayoral) Dwelling houses	5417		3995	£0.00	£60.00	£0.00	£239,700.00

BCIS figure for year in which the charging schedule took effect (Ic)	224	323
BCIS figure for year in which the planning permission was granted (Ip)	323	
TOTAL CHARGEABLE AMOUNT	£1,152,129.46	£239,700.00

*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: 18/4810

To: Kerry Radford
JLL
30 Warwick Street
London
W1B 5NH

I refer to your application dated **14/12/2018** proposing the following:

Demolition of the former day centre and redevelopment of the site to provide an apartment block rising to 5 storeys comprising 13 flats (4 x 1 bedroom and 9 x 2 bedroom), 14 houses rising to 3 storeys (10 x 3 bedroom and 4 x 4 bedroom), and one apartment block rising to 5 storeys comprising 40 studio flats with an element of care (Use Class C3(b)) with associated amenity space and landscaping, the creation of a new loop road, car parking, cycle storage and refuse storage

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

at **Stonebridge Primary School Annexe, Twybridge Way, London, NW10 0ST**

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:-
 - Revised National Planning Policy Framework 2018 (NPPF)
 - National Planning Practice Guidance (NPPG)
 - London Plan 2016
 - London Borough of Brent Core Strategy 2010
 - London Borough of Brent Development Management Policies 2016
 - Brent 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):

060-TWY-001A;
060-TWY-002A;
060-TWY-003B;
060-TWY-010A;
060-TWY-100A;
060-TWY-101A;
060-TWY-102A;
060-TWY-110A;
060-TWY-111A;
060-TWY-112A;
060-TWY-120A;
060-TWY-121A;
060-TWY-122A;

060-TWY-200A;
060-TWY-201A;
060-TWY-202A;
060-TWY-203A;
060-TWY-204A;
060-TWY-205A;
060-TWY-206A;
060-TWY-210A;
060-TWY-211A;
060-TWY-212A;
060-TWY-213A;
060-TWY-220A;
060-TWY-221A;

060-TWY-300A;
060-TWY-301A;
060-TWY-302A;
060-TWY-303A;
060-TWY-304A;
060-TWY-305A;
060-TWY-310A;
060-TWY-311A;
060-TWY-312A;
060-TWY-313A;

060-TWY-320A;
060-TWY-321A.

Design and access statement (Issue A) dated Nov 2018 from Southstudio;
Planning statement from JLL dated December 2018;
Affordable housing statement from JLL dated December 2018;
Revised air quality assessment from REC Ltd (ref. AQ106522-1r3 Rev 2) dated March 2019;
Arboricultural Impact Assessment, Method Statement and Tree Protection Plan dated 8th Nov 2018;
Daylight and sunlight assessment from Hydrock Consultants Ltd (ref. C04595-HYD-00-XX-REP-007 Issue 3) dated 14th Nov 2018;
Revised energy strategy from Hydrock Consultants Ltd (ref. C04595-HYD-00-XX-REP-0008 Issue 03) dated 18th March 2019;
External lighting strategy from Hydrock Consultants Ltd (ref. C04595-HYD-00-XX-REP-007 Issue 03) dated 6th November 2018;
Flood risk assessment and drainage strategy report from Price and Myers dated Nov 2018;
Noise planning report from Hydrock Consultants Ltd (ref. C04595-ACO-EJ-20181024 Issue 06) dated 6th November 2018;
Preliminary Ecological Appraisal from Middlemarch Environmental (Ref: RT-MME-129605-02 Rev A) dated November 2018;
Statement of Community Involvement from JLL dated December 2018;
Sustainability statement from Hydrock Consultants Ltd (ref. C04595-HYD-00-XX-REP-0005 Issue 02) dated 6th November 2018;
Transport Assessment (ref. 1808-62/TA/02 Rev A) from Transport Planning Associates dated November 2018

- 3 The development hereby approved should be built so that all of the C3 residential dwellings achieve Building Regulations requirement M4(2) – ‘accessible and adaptable dwellings’ and that all 40 of the C3b residential units achieve Building Regulations requirement M4(3) – ‘wheelchair user dwellings’.

Reason: To ensure that the development achieves an inclusive design in accordance with London Plan Policy 3.8

- 4 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.

- 5 Notwithstanding the provisions of the Town & Country Planning (Use Classes Order) 1987, as amended, the 40 units within the hereby permitted shall only be used for the provision of residential accommodation within Use Class C3b and for no other purposes within Class C3 of the schedule to the Order 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 and to meet Brent's housing needs.

- 6 All 67 of the residential units (both C3 and C3b accommodation) hereby approved shall be implemented and maintained for the lifetime of the development as 100% affordable rented housing (meaning at a social / affordable rent) and LB Brent will have the right to nominate people to be housed in the C3b residential accommodation, 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 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.

- 7 The parking spaces, access road and footways shall be constructed and permanently marked out prior to any occupation of the development as approved by the Local Planning Authority.

Reason: To ensure that the proposed development does not prejudice the free flow of traffic or the conditions of general safety within the site and along the neighbouring highway.

- 8 (a) The applicant shall implement the following highway works (set out on drawing 060-TWY 003B) prior to any occupation of the units hereby approved :

(i) construct the proposed loop road for the development including footways and parking bays, with minor amendments to include raised tables at the junctions with Twybridge Way and the northern bend in the road;

(ii) construct parking lay-bys along the Twybridge Road frontage of the site

(b) Prior to commencement of the development (save for demolition), the applicant shall make appropriate arrangements in writing to enter into an agreement with the Local Highway Authority to provide the following highway works:

(iii) remove all signing, lining and guardrailling associated with the existing school use, together with all associated lighting, signing, lining and drainage and other ancillary and accommodation works and works necessary to statutory undertakers' equipment;

(iv) a review of waiting restrictions and traffic management measures in the vicinity of the school.

None of the units hereby approved shall be occupied (or other timescales to be agreed in writing by the Local Planning Authority) until the above works have been completed to the satisfaction of the Local Highway Authority and have been certified in writing as being substantially complete by or on behalf of the local planning authority.

Reason: In the interests of highway and pedestrian safety.

- 9 The parking spaces (including disabled and ambulance/minibus spaces), cycle storage facilities and visitor cycle stands, and refuse storage shall be installed prior to 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 building hereby approved.

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

- 10 Prior to first occupation of the development hereby approved, electric vehicle charging points shall be provided and made available for use within at least 20% of the approved car parking spaces within the site. The provision of electric vehicle charging points shall be in accordance with London Plan standards, providing both active and passive charging points.

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

- 11 All tree protection measures as recommended within the submitted BS 5837:2012 Arboricultural Impact Assessment, Method Statement & Tree Protection Plan (dated 18th Nov 2018) shall be

adhered to throughout the construction of the development.

Reason: To protect trees surrounding the site from damage associated with construction processes.

- 12 Prior to the commencement of the development a Construction Method Statement (CMS) shall be submitted to and agreed by the Local Planning Authority outlining measures that will be taken to control dust, noise and other environmental impacts of the development. The CMS shall include details of a dust monitoring plan, to be implemented during construction and demolition works. All agreed actions shall be carried out in full.

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

- 13 All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up to date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register at <https://nrmm.london/>

Reason: To protect local amenity and air quality in accordance with Brent Policy EP3 and London Plan policies 5.3 and 7.14

- 14 Prior to the occupation of the development, all mitigation measures described in the approved Air Quality Impact Assessment (REC air quality assessment (ref AQ 106522-1R3 dated April 2019)) shall be implemented in full.

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

- 15 All recommendations contained within the submitted Ecology study (Middlemarch Environmental - PRELIMINARY ECOLOGICAL APPRAISAL – dated November 2018 – Ref: RT-MME-129605-02 Rev A) shall be adhered to throughout the construction of development.

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

- 16 The development hereby approved shall be carried out in full accordance with the details stipulated in the approved Flood Risk and Drainage Assessment (Price Myers - Flood Risk Assessment and Drainage Strategy Report – November 2018 – ref. 25518).

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

- 17 All dwellings (both C3 and C3b accommodation) 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 Building Regulations 2010.

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

- 18 All mitigation measures set out within the Energy Strategy (Hydrock Consultants Ltd – Energy Strategy - C04595-HYD-00-XX-REP-0008 – Issue No. 3 dated March 2019), including appropriate payment of carbon offset funding, shall be fully implemented and maintained for the lifetime of the Development unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure a satisfactory development which incorporates sustainability measures, and accord with London Plan Policy 5.2.

- 19 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 prior to any works commencing above ground level. 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.

- 20 Prior to works above ground level details of appropriate screens between the ground floor flats within the C3 apartment block, and the communal amenity space at this level, shall be submitted to and approved in writing by the Local Planning Authority, and thereafter implemented in accordance with the approved plans.

Reasons: In the interests of the amenities of the adjoining occupiers.

- 21 Details demonstrating that the developer or constructor has joined the Considerate Constructors Scheme shall be submitted to the Local Planning Authority prior to commencement of works on site and the developer or constructor shall thereafter adhere to the requirements of the Scheme for the period of construction for that part of the development.

Reason: In the interest of the amenities of the adjoining and nearby owners and occupiers.

- 22 Prior to commencement of any works on site (including site clearance works and or demolition) a Construction Traffic & Logistics Plan shall be submitted to and approved in writing, and the development shall be implemented fully in accordance with the approved details thereafter, unless otherwise agreed in writing by the Local Planning Authority. The Plan shall provide for:

- (i) the parking of vehicles of site operatives and visitors;
- (ii) Construction traffic routes to the development site;
- (iii) loading and unloading of plant and materials;
- (iv) storage of plant and materials used in constructing the development;
- (v) The operation of the site equipment generating noise and other nuisance causing activities, audible at the site boundaries or in nearby residential properties to only be carried out between the hours of 08:00 – 18:00 Mondays-Fridays, 08:00-13:00 Saturdays and at no time on Sundays or Bank Holidays (unless otherwise agreed as part of the Construction Management Plan);
- (vi) wheel washing facilities and schedule of highway cleaning;
- (vii) measures to control the emission of dust and dirt during construction;
- (viii) a scheme for recycling/disposing of waste resulting from demolition and construction works;
- (ix) Staff car parking facilities; and

(x) Adhere to the Considerate Contractors Scheme.

Reason: To ensure that the environmental impacts of the works are suitably mitigated to protect residential amenity and ensure the development does not have an adverse impact on the highway.

- 23 Within 3 months of first occupation, a revised Residential Travel Plan shall be submitted to and approved in writing, and shall be fully implemented for the lifetime of the Development, or as amended by the agreement of the Local Planning Authority in writing. This Plan shall demonstrate the Travel Plan is of sufficient quality to score a PASS 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.

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

- 24 Within six months of commencement of works above ground level, a scheme shall be submitted to and approved in writing by the Local Planning Authority that provides details of all landscaped areas of the development. Such approved landscaping works shall be completed prior to first occupation of the development hereby approved and thereafter maintained.

The submitted scheme shall include details of:

- a) the planting scheme for the site, which shall include species, size and density of plants and trees, sub-surface treatments (or planters / green roof substrate profiles where applicable), details of the extent and type of native planting, any new habitats created on site and the treatment of site boundaries;
- b) walls, fencing and any other means of enclosure, including materials, designs and heights;
- c) treatment of areas of hardstanding and other areas of hard landscaping or furniture, including materials;
- d) a landscaping maintenance strategy, including details of management responsibilities.

Any trees and shrubs planted in accordance with the landscaping scheme and any plants which have been identified for retention within the development which, within 5 years of planting, are removed, dying, seriously damaged or become diseased, shall be replaced to the satisfaction of the Local Planning Authority, by trees and shrubs of similar species and size to those originally planted.

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

- 25 Any plant shall be installed, together with any associated ancillary equipment, so as to prevent the transmission of noise and vibration into neighbouring premises. The rated noise level from all plant and ancillary equipment shall be 10dB(A) below the measured background noise level when measured at the nearest noise sensitive premises. An assessment of the expected noise levels shall be carried out in accordance with BS4142:2014 'Methods for rating and assessing industrial and commercial sound.' and any mitigation measures necessary to achieve the above required noise levels shall be submitted to the Local Planning Authority in writing for approval. The plant shall thereafter be installed and maintained in accordance with the approved details.

Reason: To protect acceptable local noise levels, in accordance with Brent Policy DMP1.

- 26 Prior to the commencement of the use the applicant shall provide details of all domestic boilers

installed demonstrating that the rated emissions of Oxides of Nitrogen (NOx) do not exceed 30 mg/kWh, in writing for the approval of the Local Planning Authority.

Reason: To protect local air quality, in accordance with Brent Policy DMP1.

- 27 Prior to the commencement of development hereby approved (save for demolition), full details of the proposed hard and soft landscaping scheme along the northern boundary of the site shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Canal & River Trust.

The landscaping shall be carried out fully in accordance with the approved details thereafter unless otherwise agreed in writing by the Local Planning Authority.

Reason: To improve the appearance of the site when viewed from the waterside and to enhance the biodiversity of the area.

- 28 Prior to the commencement of the development hereby approved (save for demolition), full details of the proposed external lighting scheme to the northern boundary of the site, along the canal feeder, shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Canal & River Trust. The approved lighting scheme should be implemented in full thereafter prior to first occupation of the development unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interest of ecology, visual amenity and the waterway setting.

- 29 Within 3 months of practical completion of the development, an Energy Assessment Review shall be submitted to and approved in writing by the Local Planning Authority. This review by an approved independent body shall verify that the development has met or exceeded the following:

(i) Minimum 35% improvement on Part L 2013 Building Regulations Target Emission Rate ("TER") for CO2 emissions;

If the review specifies that the development has failed to meet the above levels, and it has been satisfactorily demonstrated that it has not been possible or feasible to incorporate any of the measures proposed within the Energy Statement and/or the Sustainability Strategy then details of alternative measures or alternative means by which the impacts of the failure to implement the measures shall be submitted to and approved in writing by the Local Planning Authority within 2 months of the review, and implemented in full thereafter in accordance with a timescale agreed with the Local Planning Authority.

Reason: To ensure a satisfactory development which incorporates sustainability measures.

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 that the treatment/finishing of flank walls can be implemented, before work commences, 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 by the applicant to contact the Head of Highways & Infrastructure to arrange for the highway works to be undertaken. Such works are undertaken by the Council at the applicant's expense.
- 5 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.

6 Waste Comments

Following initial investigations, Thames Water has identified an inability of the existing surface water infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position for surface water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No properties shall be occupied until confirmation has been provided that either:- all surfacewater network upgrades required to accommodate the additional flows from the development have been completed; or - 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." The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

Thames Water would advise that with regard to Foul Water sewage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided

Water Comments

If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater.

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

https://urldefense.proofpoint.com/v2/url?u=https-3A_developers.thameswater.co.uk_Developing-2Da-2Dlarge-2Dsite_Planning-2Dyour-2Ddevelopment_Working-2Dnear-2Dor-2Ddiverting-2Dour-2Dpipes&d=DwlFaQ&c=OMjwGp47Ad5otWI0_lpOg&r=G_hzVvSAkixNxE_J_EiJNJR_FDFWfjexJLES8DRQ06gKk&m=AuhBjV5f0khYuhU_ncQVS2t_V1kjMaOEs0xobCc1fM&s=siO9cP5Dy-Dubg8_JA7ciUKp60qteaQH0yN9LNPTuA8&e=. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum

pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

https://urldefense.proofpoint.com/v2/url?u=https-3A_developers.thameswater.co.uk_Developing-2Da-2Dlarge-2Dsite_Planning-2Dyour-2Ddevelopment_Working-2Dnear-2Dor-2Ddiverting-2Dour-2Dpipes&d=DwIFaQ&c=OMjwGp47Ad5otWI0_lpOg&r=G_hzVvYSAkixNxE_J_EjNJR_FDWFjexJLES8DRQ06qKk&m=AuhBjv5f0khYuhU_ncQVS2t_V1kjMaOEs0xobCc1fM&s=siO9cP5Dy-Dubq8_JA7cIUkP60qteaQH0yN9LNPTuA8&e=

Supplementary Comments

- Foul discharge connection into 150mm sewer on Twybridge Way for 67 dwellings;

Assessment shows the discharge to be within sewer threshold.

- Surface Water; Thames Water does not support surface water to be discharged into the sewer. The site is next to a Watercourse hence all flows should be directed their following London Plan 5.13.

The London Plan - Policy 5.13 Sustainable Drainage' states that a development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off, 5l/s/ha, rates and ensure that surface water run-off is managed as close to its source as possible in line with the following drainage hierarchy.

1. Rainwater harvesting (including a combination of green and blue roofs).

2. Infiltration techniques and green roofs 3. Rainwater attenuation in open water features for gradual release 4. Rainwater discharged direct to watercourse (unless not appropriate) 5.

Rainwater attenuation above ground (including blue roofs) 6. Rainwater attenuation below

ground 7. Rainwater discharge to a surface water sewer or drain 8. Rainwater discharge to a

combined sewer

- 7 The Council recommends that the maximum standards for fire safety are achieved within the development.
- 8 The applicant/developer is advised that any oversail, encroachment or access to the Brent Feeder requires written consent from the Canal & River Trust, and they should contact the Canal & River Trust regarding this. Please contact their Estates team at bernadette.mcnicholas@canalrivertrust.org.uk for further information.
- 9 The applicant/developer is advised to refer to the current Canal and River Trust 'Code of Practice for Works affecting the Canal and River Trust' to ensure that any necessary consents are obtained, and liaise with the Trust's Third Party Work engineer: <http://canalrivertrust.org.uk/about-us/for-businesses/undertaking-works-on-our-property>.
- 10 Any surface water discharge to the waterway will require prior consent from the Canal and River Trust. Please contact Chris Lee from the Canal and River Trust's Utilities Team at Chris.Lee@canalrivertrust.org.uk
- 11 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.

Any person wishing to inspect the above papers should contact Neil Quinn, Planning and Regeneration, Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ, Tel. No. 020 8937 5349