

COMMITTEE REPORT

Planning Committee on
Item No
Case Number

17 January, 2024
04
22/0541

SITE INFORMATION

RECEIVED	16 February, 2022
WARD	Harlesden & Kensal Green
PLANNING AREA	Brent Connects Harlesden
LOCATION	24 High Street, London, NW10 4LX
PROPOSAL	Change of use of part of ground floor, 1st, 2nd and 3rd floors from student accommodation, change of use of 1st floor retail storage, erection of extension at 2nd floor level and erection of 2 storey extension to create a co-living scheme (45 units - Use Class Sui Generis) including communal kitchen/lounges on 1st, 2nd and 3rd floor levels, creation of communal courtyard on 1st floor level and common area on ground and 1st floor levels with minor alterations to the ground floor to accommodate cycle parking and refuse facilities and replacement double glazed timber sash windows
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_158969</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 "22/0541" (i.e. Case Reference) into the search Box3. Click on "View Documents" tab

RECOMMENDATIONS

That the Committee resolve to **GRANT** planning permission subject to:

- (i) The prior completion of a legal agreement to secure the following planning obligations:
 - a) Payment of the Council's legal and other professional costs in (a) preparing and completing the agreement and (b) monitoring and enforcing its performance
 - b) Notification of material start 28 days prior to commencement
 - c) Housing
 - i. Securing an early stage and post-implementation review mechanism in relation to off-site affordable housing
 - ii. Securing the submission and approval of an Operational Management Plan for the co-living units
 - d) Employment and Skills Training
 - e) Carbon off-set contribution
 - f) Any other planning obligation(s) considered necessary by Committee and the Head of Planning
- (ii) That the Head of Planning is delegated authority to negotiate the legal agreement indicated above.
- (iii) That the Head of Planning is delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

Conditions

1. Time limited permission (3 years)
2. Approved plans
3. Number of co-living units
4. Accessible and adaptable dwellings and wheelchair user dwellings to be implemented
5. Obscure glazing installed
6. Privacy screens installed
7. Water consumption limitation
8. Non-road mobile machinery power restriction
9. Noise insulation measures
10. Energy assessment measures implemented
11. Parking permit restriction
12. Refuse Storage and Cycle parking to be provided
13. Green/sedum roofs details to be submitted
14. Details of external materials to be submitted (including samples)
15. Considerate Constructors Scheme
16. Construction Management Plan

Informatives

1. CIL liability
2. Party wall information
3. London Living Wage note
4. Fire safety advisory note
5. Any other informative(s) considered necessary by the Head of Planning

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

SITE MAP



Brent

Planning Committee Map

Site address: 24 High Street, London, NW10 4LX

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This map is indicative only.

PROPOSAL IN DETAIL

The proposals can be summarised as follows:

- Change of use of part of ground floor, 1st, 2nd and 3rd floors from student accommodation, and change of use of 1st floor retail storage to co-living accommodation.
- The erection of rear extensions at ground, first and second floor levels to provide a total of 45 co-living units, including the creation of communal kitchens and lounges, internal amenity space including a cinema, gym and workspace at ground floor level.
- The creation of communal courtyard on first floor level and common area with minor alterations to the ground floor to accommodate glazed canopy, cycle parking and refuse facilities, and replacement double glazed timber sash windows.

EXISTING

The application site concerns a three-storey building that is located on Harlesden High Street. The site is accessed via a doorway adjacent to No. 24 High Street and consists of some of the ground floor of this building and the upper floors of 16-26 High Street. The site also extends to the rear and consists of a two and three storey building. The site does not contain any listed buildings, however it is located within the Harlesden Conservation Area and the Harlesden Neighbourhood Area.

Harlesden LUL station and Willesden Junction overground/ tube station are within walking distance, and the site has a PTAL rating of 6.

AMENDMENTS SINCE SUBMISSION

Revisions to the scheme were submitted in May 2023, with the amendments summarised as follows:

- The clear provision of four wheelchair accessible units at ground floor level and introduction of a wheelchair lift to ensure accessibility to communal facilities for these occupiers;
- More detailed floor plans showing the provision of key items within communal kitchens, including fridge/freezers, microwave, dishwasher etc, and space for wardrobes, desk and worktop space within each co-living unit.

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. **Objections from interested groups:** Although no letters of objection or comment have been received from surrounding residents, comments have been received from the Harlesden Neighbourhood Forum concerning waste management within the development, and requiring local consultation with them during the development. These items are addressed in more detail below.
2. **Principle of redevelopment of the site for co-living use:** The conversion of the site and the associated extensions for use as co-living accommodation is considered acceptable within the Harlesden Town Centre and in area of excellent public transport accessibility. The proposals would accord with the key criteria set out in policy BH7 of the Local Plan.
3. **Viability and Affordable Housing:** The scheme would not provide any contribution in lieu of affordable housing, which is required by policy H16 of the London Plan. However it has been demonstrated by a financial viability appraisal that this cannot viably be provided, and subject to a section 106 agreement securing both early and late stage review mechanisms, is considered acceptable.
4. **Design and heritage:** The proposed extensions are of a modest scale and bulk, sited to the rear of the building. They would be sympathetic to the host building and would not result in

harm to the Harlesden Conservation Area.

5. **Quality of the resulting residential accommodation:** The residential accommodation proposed is of sufficiently high quality, meeting the particular needs and requirements of future occupiers and compares favourably with similar co-living developments approved in neighbouring London boroughs.
6. **Neighbouring amenity:** The extensions have been designed to ensure there would be no material harm to adjoining occupiers in terms of loss of daylight, sunlight or outlook, nor any increase in sense of enclosure. Subject to conditions around obscure glazing and the use of privacy screens, there would also be no material loss of privacy to adjoining occupiers.
7. **Highways and transportation:** The scheme would be car-free (with the exception of blue badge parking) and given the existing student accommodation use, the proposals are not considered to result in any harm to local parking or highways conditions.
8. **Environmental impact, sustainability and energy:** The measures outlined by the applicant achieve the required improvement on carbon savings within London Plan policy, and subject to appropriate conditions, the scheme would not have any detrimental impacts in terms of air quality, land contamination, noise and dust from construction, and noise disturbance to future residential occupiers.

RELEVANT SITE HISTORY

20/1359. Full Planning Permission. Refused

Change of use of part of ground floor, 1st, 2nd and 3rd floors from student accommodation, change of use of 1st floor retail storage, erection of extension at 2nd floor level and erection of 2 storey extension to create a co-living scheme (56 units - Use class Sui Generis) including communal kitchen/lounges on 1st, 2nd and 3rd floor levels, creation of communal courtyard on 1st floor level and common area on ground and 1st floor levels with minor alterations to the ground floor to accommodate cycle parking and refuse facilities and replacement double glazed timber sash windows.

The application was refused for the following reasons:

1. *The proposal as indicated on the drawings submitted would not constitute adequate, high quality, functional living space within a large-scale purpose-built shared living development by virtue of the 56 units which would be self-contained with insufficient shared communal space which would be of poor design and quality, contrary to Policy H16 of the draft London Plan and Policy DMP20 of Brent's Development Management Policies 2016*
2. *In the absence of a management plan the proposal has not provided detail on any communal facilities for the future occupiers such as a laundry service or room cleaning facilities. It can therefore not be confirmed that the accommodation provided subject of this application would be shared or communal in nature, the proposal appears to provide individual self-contained units contrary to Policy H16 of The draft London Plan and Policy DMP20 of Brent's Development Management Policies 2016.*
3. *The proposal has not been demonstrated to meet an identified need within the borough. Contrary to Policy H16 of the draft London Plan and Policy DMP20 of Brent's Development Management Policies 2016.*
4. *The proposed cycle storage would not meet the draft London Plan requirements for a development of this size and the cycle storage could not be accommodated in a secure location on site, contrary to Policy T5 of the draft London Plan and Policy DMP12 of Brent's Development Management Policies 2016.*

17/2433. Full Planning Permission. Granted.

Change of use of 1st floor from apart-hotel storage area (Use Class C1) to student accommodation units (x8) (Use Class Sui Generis), creation of a communal courtyard, erection of extensions at 2nd and 3rd floor levels to create additional student accommodation units (x6) with associated alterations to the ground floor to accommodate provision for cycle parking and refuse facilities

15/5604. Full Planning Permission. Granted. _

Change of use of the 1st, 2nd and 3rd floors from apart-hotel to 44 student accommodation units (Use class Sui Generis) with minor alterations to the ground floor to accommodate cycle parking and refuse facilities and replacement double glazed timber sash windows.

13/2833. Full Planning Permission. Granted. _

Change of use to apart-hotel (Use Class C1) from office (Use Class B1)

11/2509. Full Planning Permission. Granted. _

Change of use and reconfiguration of Units 16-18 (even) to A1 (Retail) Use, demolition of existing two storey element to the rear and its replacement with a two storey rear extension to provide retail and storage space, 4-storey stairwell extension to offices and alterations to shop front and subject to a Deed of Agreement dated 6th March 2012 under Section 106 of the Town and Country Planning Act.

CONSULTATIONS

Public Consultation

A total of 118 addresses within High Street, Nicoll Road and Jubilee Close were consulted on the application. The Harlesden Neighbourhood Forum were also consulted.

A Site Notice was displayed 28/03/2022

A Press Notice was published 03/03/2022.

The Harlesden Neighbourhood Forum have commented on the proposals. Although they welcome the development and would recommend approval, they have also raised the following issues:

Comment	Officer response
Request condition ensuring all tenancy agreements include instructions not to place waste outside on pavement but use all communal services provided and associated requirements.	Sufficient waste storage is shown within the development and it is expected that this would be collected in line with Veolia requirements.
Request planning condition to ensure a commitment to liaise with local groups, in particular the Harlesden NF. Note there have been no attempts to engage with the NF to date.	While there is no policy expectation to liaise with local groups, the applicant has been informed of Harlesden NF's request.

Internal consultation

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, and contaminated land. See detailed considerations section of report for further comments on these issues.

POLICY CONSIDERATIONS

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of this application should be in accordance with the development plan unless material considerations indicate otherwise.

The development plan is comprised of:

London Plan (2021)

Local Plan (2019 – 2041)

Key policies include:

The London Plan (2021)

GG1	Building Strong and inclusive communities
GG2	Making the best use of land
GG3	Creating a healthy city
GG4	Delivering new homes Londoners need
SD6	Town centres and high streets
SD7	Town centres: development principles and Development Plan Documents
SD8	Town centre network
SD9	Town centres: Local partnerships and implementation
D1	London's form, character and capacity for growth
D2	Infrastructure requirements for sustainable densities
D3	Optimising site capacity through the design-led approach
D4	Delivering good design
D5	Inclusive design
D6	Housing quality and standards
D7	Accessible housing
D8	Public realm
D11	Safety, security and resilience to emergency
D12	Fire safety
D14	Noise
H1	Increasing housing supply
H10	Housing size mix
H16	large-scale purpose-built shared living
S4	Play and informal recreation
HC1	Heritage conservation and growth
G1	Green infrastructure
G5	Urban greening
G6	Biodiversity and access to nature
SI 1	Improving air quality
SI 2	Minimising greenhouse gas emissions
SI 3	Energy infrastructure
SI 4	Managing heat risk
SI 5	Water infrastructure
SI 6	Digital connectivity infrastructure
SI 7	Reducing waste and supporting the circular economy
SI 12	Flood risk management
SI 13	Sustainable drainage
T2	Healthy Streets
T3	Transport capacity, connectivity and safeguarding
T4	Assessing and mitigating transport impacts
T5	Cycling
T6	Car parking
T6.1	Residential parking
T6.6	Non-residential disabled persons parking
T7	Deliveries, servicing and construction
T9	Funding transport infrastructure through planning
DF1	Delivery of the Plan and Planning Obligations
M1	Monitoring

Brent Local Plan (2019-41)

DMP1	Development management general policy
BD1	Leading the way in good urban design
BH1	Increasing housing supply in Brent
BH5	Affordable housing
BH6	Housing size mix
BH13	Residential amenity space
BE4	Supporting Strong Centres Diversity of Uses
BHC1	Brent's Heritage Assets
BGI1	Green and blue infrastructure in Brent
BGI2	Trees and woodlands
BSUI1	Creating a resilient and efficient Brent
BSUI2	Air quality

- BSUI3 Managing flood risk
- BSUI4 On-site water management and surface water attenuation
- BT1 Sustainable travel choice
- BT2 Parking and car free development
- BT3 Freight and servicing, provision and protection of freight facilities

The following are also relevant material considerations:

- National Planning Policy Framework (NPPF)
- Planning Practice Guidance (PPG)
- LB Brent S106 Planning Obligations SPD (2022)
- LB Brent Design Guide for New Development (SPD1)
- LB Brent Waste Planning Guide SPG
- LB Brent Air Quality Action Plan 2017-2022
- London Cycling Design Standards

DETAILED CONSIDERATIONS

Principle of development

Principle of co-living use

Adopted policy context

1. Policy H16 of the London Plan recognises that large scale shared living developments may provide a housing option for single person households who cannot or choose not to live in self-contained homes or HMOs. This policy ensures that new purpose-built shared living developments are of acceptable quality, well-managed and integrated into their surroundings.
2. Policy H16 applies to large-scale purpose-built shared living developments which in planning terms are sui generis non-self-contained market housing. These are not restricted to particular groups by occupation or specific need such as students, nurses or people requiring temporary or emergency accommodation proposed by speciality providers.
3. Large-scale purpose-built shared living developments are generally of at least 50 units. This type of accommodation is seen as providing an alternative to traditional flat shares and includes additional services and facilities, such as room cleaning, bed linen, on-site gym and concierge service.
4. Policy BH7 of the Local Plan (Accommodation with Shared Facilities or Additional Support) is also of relevance. This states that proposals for non self-contained residential accommodation with shared facilities or on-site support/care to assist residents in their daily lives will be supported where the development meets all the following criteria:
 - a) is located in an area with good access to public transport and other amenities, including shops (normally within 400m);
 - b) is of an acceptable quality meeting appropriate standards for the needs of its occupants, including external amenity space, appropriate communal facilities, levels of support/ care and mobility;
 - c) includes management arrangements agreed with the council suitable to its proposed use and size to not unacceptably impact on neighbour amenity;
 - d) demonstrates that there is a specific Brent need, or in the case of purpose built student need accommodation a London need, for the particular use; and
 - e) will not lead to an over-concentration of the type of accommodation in the area. For Houses in Multiple Occupation an over-concentration is defined as where three or more of the ten nearest properties are Houses in Multiple Occupation.
5. The supporting text for policy BH7 notes that whilst the majority of housing needs will be met through self-contained residential accommodation, some will be met through non self-contained accommodation with shared facilities such as co-living. The policy recognises that changes in demographics, welfare and lifestyle choices mean that there will be increased demand for this type of accommodation. Non self-contained accommodation make a contribution to meeting local needs. They can also assist in developments through increased viability and vitality and more balanced communities.

6. The above policies refer to the need for co-living units to be of sufficient quality. While policies refer to certain factors which influence co-living housing quality, the policies do not set metrics for quality, such as minimum amounts of internal or outdoor space. Instead, this must be considered on a case-by-case basis having regard to the size and quality of both private and communal spaces, with co-living schemes normally including a significantly greater amount and variety of communal indoor space than a typical flatted development. Given the reliance on the communal spaces to achieve a sufficient level of housing quality, access to the communal spaces is normally included within the rental charges for the co-living units rather than being an optional extra facility. The quality of accommodation within the proposed scheme is discussed in more detail later in this report.

Analysis of co-living use against Mayoral and LB Brent criteria

7. When assessed against the criteria in Policy H16 of the London Plan, as outlined above, this element of the scheme will:

a) *Be of a good quality and design*

8. Whilst this will primarily be discussed below, the design and layout of the building is acceptable. The extensions to the building are modest but respect the scale of the existing building. The co-living accommodation is designed to make a more efficient use of the site, and provide a range of facilities within the one building.

b) *It will contribute towards mixed and inclusive communities*

9. This type of accommodation is intended for those who cannot or prefer to not live in self-contained homes or HMOs or those households who are above the threshold for traditional social housing but are unable to afford properties on the open market or are attracted by the range and convenience of facilities provided. The facilities provided are also designed to encourage social interaction whilst also providing private space.

c) *Well-connected to services/employment through non-car modes*

10. The site is within the Harlesden Town Centre and all the services and facilities therein. As confirmed above, the site is located within an area with a PTAL score of 6, with two nearby bus stops serving multiple routes, and also within walking distance of Willesden Junction and Harlesden stations. The scheme is car free, although provision for blue-badge spaces will be made when required.

d) *Under single management*

11. The scheme will be under the single management (of the applicant), and this would be secured through a legal agreement.

e) *All units are for rent, with a minimum tenancy period of 3 months*

12. All units will be rented, with a minimum tenancy period of 3 months.

f) *Communal facilities / services provided*

13. Communal facilities and services will be provided in accordance with the criteria. These include:

- a) Communal kitchens will be provided on each floor, with two at first floor, one at second floor and one at third floor. Given the scheme only accommodates 45 units in total, this is considered appropriate, and is supplemented by small kitchenettes within individual rooms.
- b) External communal amenity space will be provided in the form of a communal courtyard at first floor level, which given the limited opportunities for external space is considered acceptable.
- c) Each floor will have internal communal amenity space, a shared workspace is provided on the first floor, and common rooms and a cinema room are provided at ground floor level.
- d) Laundry and drying facilities are located on the ground floor
- e) A concierge will be located on the ground floor, overlooking street level
- f) Bedding and linen changing and/or room cleaning services are provided

g) *Private units provided with adequate functional living space/layout and not self-contained*

14. The individual units are considered to provide adequate functional living space and layouts (see Table 1 below), with the average size of the rooms being greater than comparable schemes recently approved in LB Brent, including at 1 Burnt Oak Broadway (ref. 20/1163) and 249-289 Cricklewood Broadway. In addition, none are self-contained or capable of being used as self-contained accommodation.

h) A management plan is provided.

15. A draft Operational Management Plan has been provided, which sets out how the applicants – Ziser London – will operate the development as a single management company, with the 45 co-living units all privately rented out on independent tenancies. The OMP also states that there would be an on-site concierge desk located at the main entrance to the building, with co-living residents given an electronic key fob to access individual rooms and the communal areas to prevent security issues. CCTV would also be installed throughout the building.

i) It delivers a cash in lieu contribution towards conventional C3 affordable housing.

16. A financial viability assessment was submitted and independently reviewed, and it has been concluded that it is not viable to provide any up-front cash in lieu payment towards conventional C3 affordable housing. However the section 106 agreement secures viability review mechanisms which would secure a payment if the financial position changes (see paras. 29-34 below for further detail).

17. In addition to the above, Policy BH7 requires an assessment of local need for this type of shared living accommodation. A report has been provided entitled 'Assessing the need for co-living accommodation in Harlesden' from Savills (dated 25/10/2021). The report identifies that within the local area (defined as the same postcode as the application site, NW10), there are expected to be circa 4,300 households aged under 40, who are privately renting. There is a slightly higher proportion of people aged under 35 (50.5%) compared with LB Brent (48.4%) average and in particular a higher proportion of those aged 25 to 34 than elsewhere in the Borough. There is also expected to be an increase of approximately 21,800 residents under 35 living within Brent by 2041, which is approximately 13.6% higher than it currently stands. At the same time, the local area is dominated by lower than average income households, with 51.7% of households within 1km of the site earning below £35,000 per annum.

18. The report concludes that there is a particular shortage of accommodation within the Harlesden local area (NW10 postcode) catering for younger, single people, and that the more flexible co-living model would represent a better alternative for this part of the population (which is ever growing) than other forms of shared housing, particularly poor quality HMOs. Officers have reviewed the report and consider the conclusions to be robust and sufficiently demonstrate there is a genuine need and demand for this type of shared living accommodation in the area, therefore complying with the criteria set out in Policy BH7.

19. Overall, the proposed development is considered to a good quality scheme that would offer a flexible and low-cost type of accommodation for future residents, contributing towards a mixed community and appropriately located in close proximity to the town centre and sustainable transport modes. Furthermore, the proposed scheme would provide a satisfactory amount of internal and external amenity space and communal facilities for future occupiers, with minimum tenancy lengths and management plan to be secured via Section 106 agreement. Therefore, officers consider that the proposed co-living accommodation would satisfy the requirements of policy H16 of the London Plan and BH7 of the Local Plan.

Loss of student accommodation

20. The supporting text for Policy BH7 of the Local Plan includes the following statement in para. 6.2.59: *'For the purposes of this policy shared housing includes houses in multiple occupation (HMOs), bed-sits, hostels, housing for older people, supported housing for those with special needs, shared-living and specialist student accommodation.'*

21. Clearly, the proposed co-living use would share very similar characteristics to the existing student accommodation, with both defined as shared housing for policy purposes. As outlined above, there is a clearly defined need for this type of living, which would cater largely for younger groups but not just for students as per the existing use. It is not considered that the loss of 45 student units would have a significant impact on demand within this sector, which is well catered for within the Borough, with recently completed schemes in Wembley at Kelaty House (ref. 12/1293) and Parkwood House (ref. 17/2782), as well as a recently approved scheme at Fairgate House (ref. 22/2225), providing approximately 1,330 student rooms by themselves.

22. As such, officers consider that the loss of student accommodation here would accord with Policy BH7 of the Local Plan.

Standard of proposed co-living accommodation

23. With regard to standards of accommodation for co-living schemes such as that proposed, there is limited guidance provided in policy H16 of the London Plan, except that a good layout and design should be provided, with adequate communal facilities including external amenity space. This is reinforced within the supporting text for policy BH7 of Brent's Local Plan. It is considered that some weight can also be given to relevant adopted policies within the London Plan (Policy D6) and Brent's Local Plan (DMP1). These policies require developments to achieve high quality standards of internal amenity and quality of accommodation, regardless of the type of accommodation being provided.

24. As set out in para. 9 above, officers consider that the scheme is of a good overall layout and provides adequate internal and external communal facilities. However in the absence of any precise standards, it is useful to compare the proposed scheme with similar co-living developments which have been approved in neighbouring London boroughs, looking at key factors such as studio floorspace sizes, levels of daylight and outlook, and amounts of amenity space provided for the flats (both internal and external). A summary is provided in the table below:

	Proposed scheme	LB Brent – 1 Burnt Oak Broadway (ref. 20/1336)	LB Brent – 249-289 Cricklewood Broadway and 60-74 Hassop Road (ref. 21/0470)	LB Ealing – Western Avenue, Acton (ref. 19/0312/FUL)
No of rooms	45	125	157	335
Room Sizes (Smallest)	24 sqm	17 sqm	23.9sqm	16sqm
Room Sizes (Largest)	32 sqm	35 sqm	42.1sqm	34.9sqm
Room size average	27.5 sqm	25 sqm	27.3sqm	16sqm
Accessible Units	4 (10%)	13 (10%)	16 (10.2%)	17 (5%)
Dual Aspect	0	0	0	1 Unit (0.3%)
Internal daylight	Not measured: conversion scheme but majority of units receive good levels of internal daylight	93% of studio rooms achieve ADF targets (in most cases 2.7-3% ADF achieved)	98% of studio rooms meet/exceed BRE target	72% achieve ADF targets
Internal Communal facilities	435sqm (average 9.6 sqm per unit)	942 sqm (average 7.5 sqm per unit)	1244sqm (K/L/D) 136sqm (gym) (avg of 7.9sqm per unit)	2557sqm (average 7.6 sqm per unit)
Private Amenity	16 of 45 units (35%) have a balcony of 2.9sqm	96% of units (120 of 125) would have a balcony of 3 or 4 sqm	All units have winter garden of 1.2sqm to 10.8 sqm	0

Shared amenity	175sqm courtyard garden	88 sqm roof terrace	1408sqm	961sqm GF and 1117sqm Roof terraces
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25. The table demonstrates that the proposed scheme generally compares well with other approved developments. The vast majority of the units would have a minimum of 25 sqm, which exceeds the average unit size within all three other developments, and 4 of the 45 rooms (10%) would be wheelchair accessible and made up of larger 29-33 sqm units. These would all be located at ground floor level and accessed via a wheelchair accessible lift, and all communal facilities would be step-free, ensuring that the key parts of the co-living space would be fully accessible.

26. The proposal provides some form of private balcony/ terrace to 35% of the units overall, which officers consider acceptable given the constraints of the site, with concerns regarding overlooking and noise/disturbance issues to surrounding residential properties (particularly on Nicoll Road) limiting the extent to which external amenity can be provided. Officers have ensured that the amount of internal communal amenity has been maximised to offset this, with revised plans securing more internal amenity to the rear at ground floor level. The units with balconies would be limited to approx. 3 sqm, but this still offers a private place for occupiers to stand/ sit out in and offers some additional variety to what is still a relatively constrained living space.

27. Officers acknowledge that in some areas, for example the lack of any dual aspect units and levels of external amenity, the proposed scheme falls short when compared to traditional residential developments. However, given this is a relatively modest shared living scheme (less than 50 units) and largely involves conversion of existing facilities rather than a comprehensive re-development (as with the other co-living schemes identified above), the proposals are considered to provide a good standard of accommodation, and it complies with relevant London and Local Plan policies in this regard.

Viability and affordable housing

28. As set out in paragraph 4 above, London Plan Policy H16 requires such developments to deliver a cash in lieu contribution towards conventional C3 affordable housing off-site. It states that Councils should seek this contribution as either a) an upfront cash in lieu payment to the local authority; or b) in perpetuity annual payment to the local authority.

29. Policy H16 goes on to state that this contribution should:

- be equivalent to 35 per cent of the units (when not on public sector land or industrial land appropriate for residential uses), to be provided at a discount of 50 per cent of market rent.
- All large-scale purpose-built shared living schemes will be subject to the Viability Tested Route set out in Policy H5 'Threshold approach to applications', however, developments which provide a contribution equal to 35 per cent of the units at a discount of 50 per cent of the market rent will not be subject to a Late Stage Viability Review.

30. Essentially, the development is therefore subject to the same viability tests as a conventional Use Class C3 housing scheme in this regard. A Financial Viability Assessment (FVA) was submitted with the application, which initially adopted a viability benchmark of approximately £6.345m. This is based on an assessment against the Existing Use Value (EUV) of the site as student accommodation. The FVA initially concluded that the scheme would break even on the basis of a developer return of 6.3% on GDV (as opposed to a target profit level of 17.5% on GDV) and section 106 obligations of approximately £45,000. Therefore the FVA concluded that the scheme could not viably provide any cash in lieu contribution to affordable housing elsewhere in the borough.

31. The FVA was independently reviewed by BNP Paribas (BNPP) on behalf of the Council. BNPP did not agree with some of the assumptions made within the FVA, including the level of developer's profit and the benchmark land value, and these were subject to detailed discussion between BNPP and the applicant. However, BNPP have ultimately concluded that the scheme would be in a deficit of circa £54,000 below the viability benchmark, and therefore it would not be viable to provide any cash in lieu contribution up front towards affordable housing.

32. There are a number of reasons identified for this deficit. The applicant has stated that both the existing student accommodation use and the proposed co-living use would generate similar rents, yields and

operational costs, particularly given there is no real uplift in the number of units (44 existing student units vs 45 proposed co-living units). Therefore, it has been argued that there are no significant financial advantages to the scheme. BNPP have generally agreed with the assumptions in this regard, and this has been backed up by rental and yield evidence of similar developments in London. At the same time, while this is not a complete re-development of the site, the proposed build costs as a result of internal refurbishment and the building of the rear extensions to provide additional units, still amount to at least £4.5m.

33. However as set out above, Policy H16 of the London Plan requires a late stage viability review to be secured where schemes do not provide a contribution equal to 35% of the units at a discount of 50% of the market rent. In this instance, the applicant has agreed to both early and late stage reviews to be secured under a section 106 agreement. As well as giving the applicant an incentive to commence the development quickly, this also ensures that a cash in lieu contribution to off-site affordable housing could still be secured, should the scheme deliver a surplus profit when it becomes operational. On this basis, officers consider that the proposals would comply with this key criteria of Policy H16 of the London Plan.

Design

34. Brent's DMP1 policy and SPD1 guidance set out the policy objectives and general requirements for good design in the built environment. The site is located in a rather congested area of development to the rear of the High Street, the more organic and lack of uniform nature of the development to the rear of the high street however appears to form part of its character.

35. The modern appearance of the proposals would be complimentary to local character and reflects previous consents on the site, approved under planning ref. 17/2433. The introduction of the natural sedum roofing material is a welcome addition and offers some softer character to the congested form of development. The zinc clad rearward element is considered to be acceptable and provides an element of variety contributing towards the design principles set out within SPD1.

36. Officers confirm that samples of all materials to be used in the development will be reviewed and approved by officers prior to any works commencing, and this would be secured by condition.

Impact to Heritage Assets

37. Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 respectively require the decision maker to have "special regard" to the desirability of preserving a listed building or its setting and pay "special attention" to the desirability of preserving or enhancing the character or appearance of a conservation area.

38. This site is to the rear of an attractive Victorian terrace of retail units with accommodation at upper levels. The front of the site is situated within the Harlesden Conservation Area. The conservation area is centred on the high street. The site proposed for development itself is not in the conservation area, but it is in Harlesden Archaeological Priority Area (APA).

39. The Greater London Archaeological Advisory Service (GLAAS) have been formally consulted and have stated that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.

40. The proposed works are sited towards a rear enclosed location and will not be obviously visible from the conservation area. They are in keeping with the surrounding modern buildings. They are therefore not considered to be harmful in this rear enclosed location.

41. The works proposed would preserve the character and appearance of the conservation area. The proposals will also meet the NPPFs overarching objectives; particularly that planning should be contributing to protecting the built and historic environment. They comply with Policy BHC1 of the London Plan and Policy HC1 of the Local Plan.

Impact on neighbouring residential amenity

42. Brent's DMP1 policy within the Local Plan and Brent's SPD1 guidance sets out a number of criteria for judging impact on neighbouring residential properties in terms of losses of privacy and the creation of a sense of enclosure. It will be important to consider the extent to which the SPD1 guidance is complied with in relation to these properties, and for this impact to be weighed up as part of an overall judgement. The SPD1

amenity impact tests and the development's performance against them are explained below.

Daylight and sunlight, and sense of enclosure impacts

43. In the interests of ensuring that the development does not appear unduly overbearing to surrounding properties, SPD1 establishes a standard for new development to sit underneath a 45-degree line drawn from a 2m height at the nearest edge of an affected property private amenity space. The proposed buildings should also sit underneath a 30-degree line drawn from a 2m height at the nearest rear habitable room windows within neighbouring properties that face towards the proposed buildings.

44. Although a daylight and sunlight assessment has not been submitted with the application, the main potential for impacts associated with the scheme lie with the proximity of rear extensions adjacent to the boundary with rear gardens at 5-9 Jubilee Close. The proposals involve a part single, part-two storey rear extension close to these gardens, however the applicants have submitted sections which clearly demonstrate that the proposed extensions would comply with both 30-degree and 45-degree rules when measured from the centre of the rear facing windows, and rear garden boundaries, of the respective properties to the north-western boundary of the site.

45. Officers are therefore satisfied that the proposals would not have any adverse impact in terms of sense of enclosure or daylight and sunlight losses to these properties on Jubilee Close, despite the lack of any detailed BRE assessment.

Overshadowing to outdoor amenity spaces

46. The proposed impact to nearby outdoor amenity spaces have also been considered. The relevant amenity spaces which are closest are the rear gardens of properties on Jubilee Close, and 5J Nicoll Road. Although additional bulk is added to the building at first floor level, there is still a set back of 2m from the rear boundary to properties of Jubilee Close and approximately 6.8m maintained to the east elevation of 5J Nicoll Road. Officers therefore consider that there would be no significant overshadowing resulting from the proposed extensions.

Privacy

47. In order to retain acceptable privacy levels to properties, SPD1 states that all primary habitable room windows within a property should be at least 9m from the boundary with the private external amenity space of neighbouring properties or adjoining sites. All secondary habitable room windows and non-habitable room windows should be obscure glazed if they cannot achieve this standard too. Furthermore, proposed habitable room windows should achieve a full 18m of separation from the habitable room windows of other properties. These standards are in the interests of protecting the privacy of neighbouring occupiers.

48. The proposals would introduce new windows and balconies within the proposed extensions, with the predominant concern being those new openings to the rear elevation which would offer views towards the rear windows and gardens of properties on Jubilee Close. There is also glazing to the first floor rear extension that has the potential to overlook the rear gardens of Jubilee Close.

49. At first floor level, windows to the communal workspace are installed which would be angled away from the rear gardens of Jubilee Close to ensure there would be no direct views towards these properties. At second floor level, the proposed extension would introduce new openings to the rear elevation, but these would be more than 13m away from the rear garden boundary of No. 11 Jubilee Close and would also be angled away from direct views to this property. Therefore, officers consider the relationship between the site and adjacent properties would be acceptable.

50. Within the development itself, obscure glazing and privacy screens are shown to the rear facing balconies and windows which look onto other units/ accommodation at first, second and third floor levels, which is required to prevent direct overlooking and privacy issues between these flats. A condition is recommended to ensure details of the privacy screens are submitted for approval, and that the screens and obscure glazing are installed before first occupation of the units.

Noise and disturbance

51. There would be some additional noise and activity generated by the proposed co-living use, however it is reasonable to expect this not to be materially worse to surrounding properties than existing levels of activity associated with the student accommodation. The proposed balconies maintain a sufficient distance

from the adjoining rear gardens and windows of properties on Jubilee Close and are very modest in size so it is not considered they would result in any material increase in noise and disturbance.

Summary

52. It is considered that the relationship of this development to its surroundings complies with relevant guidance in SPD1. Although there is additional height and massing introduced by the proposed extensions, reasonable separation distances are maintained between the development and the low-rise suburban dwellings to the immediate west. Officers therefore consider the proposals acceptable in this regard.

Transport and highways

Site context

53. The application site is located within the Harlesden Town Centre and has an excellent PTAL rating of 6. This proposal involves the extension and conversion of the accommodation to provide 45 co-living units. Although communal space (kitchen/dining areas, garden space, common rooms) is shown, each of the units is to be self-contained with its own kitchenette and bathroom, so will be assessed as an individual flat.

Car parking

54. Nevertheless, the location of the site and its excellent access to public transport means that the development would be expected to be 'car-free' anyway, as per the existing student accommodation. With no off-street parking proposed within the site, maximum parking standards would not be exceeded. However, to ensure that the development does not lead to a large increase in demand for on-street parking space in the area, it is essential that a 'car-free' agreement is applied to any planning consent to remove the entitlement of future residents to on-street parking permits. This has been acknowledged by the applicant and a suitable condition is recommended to designate the development as 'car-free'.

Cycle parking

55. London Plan standards require a secure bicycle parking space for each unit, giving a total requirement for 45 spaces. A total of 55 semi-vertical bicycle spaces are proposed in four locations on the ground floor, which accords with requirements in a secure and sheltered manner. One space is stated as being for a non-standard bike, but the available space would still require vertical storage, which is not appropriate. As there is a now surplus of bike parking, it is suggested that the smallest store for 6 bikes instead provides a reduced number of spaces with 'Sheffield' stands.

Refuse and Servicing

56. Access and refuse storage arrangements remain unaltered and are considered acceptable.

Environmental Health Considerations

Air quality

57. Although an air quality assessment (including an air quality neutral assessment) has not been submitted with the application, given the existing use is as a hotel and there would not be any fundamental changes to positions of windows/ receptors to the building, officers consider it acceptable for a condition to be attached requiring the submission of this for approval before first occupation of these new units. The condition would also require any recommended mitigation measures to be implemented before occupation.

Construction noise and nuisance

58. The development is within an Air Quality Management Area and located very close to other residential and commercial premises. Demolition and construction therefore has the potential to contribute to background air pollution levels and cause nuisance to neighbours.

59. It should be noted that in relation to these matters, there is also control through Environmental Health Legislation and a planning cannot duplicate any controls that are available under other legislation. However, the council's regulatory services team have recommended a condition requiring a Construction Method Statement to be submitted for approval before works start. Given the relatively modest scale of construction/

demolition proposed, this is acceptable. This would be required to cover highways issues as well and has been attached.

60. A further standard condition is also attached requiring all non-road mobile machinery to meet low emission standards, as set out within the London Plan (both adopted and emerging documents).

Co-location/ noise within the development

61. Although no noise impact assessment has been submitted with the application, Brent’s regulatory services team has recommended a condition is attached to ensure a scheme of sound insulation measures is secured to ensure there is no undue noise disturbance between the ground floor commercial use and the co-living accommodation at upper floors. Officers are satisfied that subject to this condition, the scheme would comply with Policy D14 of the London Plan.

Sustainability and Energy

62. An energy assessment has been submitted with the application, which sets how the London Plan energy hierarchy has been applied, with carbon emissions savings identified from passive energy saving measures including low fabric U-values, the use of mechanical ventilation with heat recovery (MVHR), as well as the installation of PV panels at roof level.

63. The assessment demonstrates that the new build element of the scheme would deliver a 16% reduction in carbon emissions below the 2013 Building Regulations baseline, which is broken down into the following site-wide elements below:

Energy Hierarchy stage	CO ₂ Emissions (T/yr)	CO ₂ Savings (T/yr)	% Saving
Notional / existing case	4.47		
Actual building	4.36	0.17	2%

Table 3-5 improvements over existing/notional (Converted Co-living units)

Energy Hierarchy stage	CO ₂ Emissions (T/yr)	CO ₂ Savings (T/yr)	% Saving
Building Regulations 2013 Baseline	1.32		
Actual building	1.04	0.21	16%

Table 3-5 improvements over Part L (New build Co-living units)

Energy Hierarchy stage	CO ₂ Emissions (T/yr)	CO ₂ Savings (T/yr)	% Saving
Building Regulations 2013 Baseline	3.41		
Actual building	2.89	0.52	15%

Table 3-5 improvements over Part L (New communal space)

64. It is accepted that the proposal largely involves the conversion of existing student accommodation to co-living units, with the conversion and extension of existing storage units accounting for only 7 of the co-living apartments provided. On this basis the scheme does not have to meet the minimum 35% reduction in carbon emissions specified in the London Plan.

65. However the scheme does need to follow the energy hierarchy (Be Lean, Be Green, Be Clean) The assessment demonstrates that a significant amount of this carbon reduction would be achieved on site through ‘be lean’ measures including low U values within the internal glazing to minimise heat gains, efficient heating systems, inclusion of heat recovery, efficient ventilation systems, energy efficient lighting and energy efficient and saving equipment. The use of renewable technologies would also be incorporated into the scheme, with PV panels at roof level.

66. The applicants have stated that the proposals do not include the extensive refurbishment of the existing building and therefore this strategy only applies to the new elements of the proposal (ie. the rear extensions). The applicants have also demonstrated that there is no district energy heat network which the site can connect to, and that the installation of CHP or other renewable technologies would not be feasible.

67. Officers acknowledge that the majority of the building has been refurbished relatively recently and given it is already used as accommodation, it is already of a satisfactory standard in terms of building efficiency and it would not be reasonable to expect significant refurbishment of these facilities. However

officers consider that within the new build elements of the scheme, energy saving measures have been maximised and would utilise the renewable energy methods installed at roof level. Officers also note that the use of green/ sedum roofs is maximised.

68. The energy assessment also sets out that a feasibility study into the use of CHP and connection to a district heating network has been carried out. No known networks in the area are known, however the assessment points out that for CHP to be viable, it would need to run continuously and requires a permanent heat demand and therefore the development would not fully utilise the energy generated by a CHP engine. Given the development largely relates to the conversion of an existing building which has heritage constraints, officers consider the lack of any future connection point as acceptable.

69. Subject to a condition which requires the measures (including overall carbon savings) set out in the energy assessment to be achieved, officers are satisfied that the proposals would comply with relevant London and Local Plan policies.

Flooding and Drainage/ Water consumption

70. The site is located within Flood Zone 1 and at low risk of flooding. London Plan policies SI 12 and SI 13 require the consideration of the effects of development on flood risk and sustainable drainage respectively while Policy BSUI3 of the Local Plan confirms the Council's approach.

71. No drainage strategy has been submitted with the application, however given the proposals largely involve the change of use of the existing building and above ground floor extensions, a condition requiring this to be submitted before works commence is considered acceptable.

72. In order to minimise impact on water supply, Policy SI 5 of the London Plan confirms that water consumption should not exceed 105 litres per head per day. A condition is attached to ensure this maximum level of water consumption is met per unit.

Trees and Landscaping

73. There are currently no trees on site or immediately adjacent to the site which would be affected by the proposals. Although there are no trees proposed within the development, the proposed floor plans identify planters to be installed within the first floor communal courtyard, and the provision of green/ sedum roofs to the new areas of extension at second and third floor levels. Given this is a brownfield site and the extent to which new landscaping can be introduced is limited, officers consider this acceptable. A condition is attached to ensure details of the green and sedum roofs are submitted before occupation, along with details of maintenance and longer-term management of these areas.

Fire Safety

74. Fire Safety is formally considered at Building Regulations stage, but Policy D12 of the London Plan requires major development proposals to include a fire statement prepared by an independently qualified assessor and detail the measures put in place to ensure the proposal achieves the highest standards in fire safety.

75. A fire statement has been submitted with the application, which officers confirm has been prepared by an independently qualified assessor. The statement sets out how the proposals (both the existing building and the proposed extensions) complies with the criteria set out in both parts A and B of Policy D12, including the proposed construction materials and building methods, and means of escape and evacuation for building occupiers in the case of emergency. The report demonstrates that the recommendations set out in the Building Regulations - Approved Document B (ADB) have been followed in the design and layout of the building and the key escape and evacuation strategies.

76. The application does not involve a new building of over 18m/ 7 storeys tall and therefore the Health and Safety Executive (HSE) are not required to be consulted. However, officers have reviewed the fire statement and are satisfied that this meets the requirements of London Plan Policy D12.

Equalities

77. In line with the Public Sector Equality Duty, the Council must have due regard to the need to eliminate discrimination and advance equality of opportunity, as set out in section 149 of the Equality Act

2010.

78. In making this recommendation, regard has been given to the Public Sector Equality Duty and the relevant protected characteristics (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation).

Conclusion

79. In summary, the principle of the proposed co-living use is considered acceptable, given the site's location within the Harlesden Town Centre and with an excellent PTAL rating. The scheme would provide a good quality level of accommodation, and it has been demonstrated adequately that there would be a local need for this type of shared living in the area. The loss of student accommodation is considered acceptable in this location.

80. The report sets out how the proposal would meet the key criteria set out in policy H16 of the London Plan and BH7 of the Local Plan. Although the proposal would not provide any payment in lieu towards off-site affordable housing for viability reasons, the section 106 agreement includes viability review mechanisms which secure a financial contribution if the scheme becomes viable at a later stage.

81. The proposed extensions would be of a modest scale and bulk and would not be detrimental to the host building or result in any demonstrable harm to the adjacent conservation area. The proposed units would be car-free, and not result in any harm in terms of transport and parking.

82. Following the above discussion, and weighing up all aspects of the proposal, officers consider that the proposal should be approved subject to conditions and appropriate obligations set out in the Section 106 agreement.

DRAFT DECISION NOTICE



Brent

DRAFT NOTICE

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

DECISION NOTICE – APPROVAL

Application No: 22/0541

To: Mr Pender
PPM Planning Limited
185 Casewick Road
West Norwood
London
SE27 0TA

I refer to your application dated **04/02/2022** proposing the following:

Change of use of part of ground floor, 1st, 2nd and 3rd floors from student accommodation, change of use of 1st floor retail storage, erection of extension at 2nd floor level and erection of 2 storey extension to create a co-living scheme (45 units - Use Class Sui Generis) including communal kitchen/lounges on 1st, 2nd and 3rd floor levels, creation of communal courtyard on 1st floor level and common area on ground and 1st floor levels with minor alterations to the ground floor to accommodate cycle parking and refuse facilities and replacement double glazed timber sash windows

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

at **24 High Street, London, NW10 4LX**

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: 09/01/2024

Signature:

Gerry Ansell
Head of Planning and Development Services

Notes

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

DnStdG

SUMMARY OF REASONS FOR APPROVAL

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

National Planning Policy Framework (2023)
The London Plan (2021)
Brent Local Plan 2019-2041
SPD1 Brent Design Guide

- 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 drawings and documents:

160521/01 Rev A Site Location Plan
160521/02 Rev A Block Plan

160521/03 Rev B Existing ground floor plan
160521/04 Rev B Existing first floor plan
160521/05 Rev B Existing second floor plan
160521/06 Rev B Existing third floor plan
160521/06A Rev B Existing roof plan
160521/07 Rev B Existing front elevation
160521/08 Existing side elevation
160521/09 Rev B Existing rear elevation
160521/10 Existing side elevation
160521/11 Existing section A
160521/12 Existing section F
160521/13 Existing section B
160521/14 Existing section C
160521/15 Existing section D

200105/16 Rev Q Proposed ground floor plan
200105/17 Rev Q Proposed first floor plan
200105/18 Rev Q Proposed second floor plan
200105/19 Rev Q Proposed third floor plan
200105/20 Rev P Proposed roof plan
200105/21 Rev P Proposed side elevation
200105/22 Rev P Proposed rear and part front elevation
200105/23 Rev P Proposed side elevation
200105/26 Rev P Proposed section A
200105/27 Rev P Proposed section F
200105/28 Rev P Proposed section B
200105/29 Rev P Proposed section C
200105/30 Rev P Proposed section D
200105/31 Rev P Proposed section E
200105/37 Rev P Proposed section G
200105/38 Rev P Proposed section H
200105/39 Rev P Proposed section I

'Assessment of Need for co-living in Harlseden' prepared by Savills dated 25.10.21
Energy Statement from JAW Consulting dated 29.12.21

Financial Viability Assessment from Douglas Birt Consulting dated January 2022
Heritage Statement from PPM Planning received February 2022
Operational Management Plan (draft) received February 2022
Transport Statement from Caneparo Associates dated October 2021

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

- 3 The development shall provide the 45 co-living units (Class sui generis), as shown on the consented plans, unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interest of proper planning.

- 4 Not less than 4 of the 45 (10%) of the co-living units within the approved development shall be constructed to wheelchair user requirements (Building Regulations M4(3)) and the remainder shall meet easily accessible/adaptable standards (Building Regulations M4(2)).

Reason: To ensure suitable facilities for disabled users and to futureproof homes.

- 5 The windows on the west elevation of the co-living units on first, second and third floor levels shall be constructed with obscure glazing and non-opening or with openings at high level only (not less than 1.7m above floor level) and shall be permanently returned and maintained in that condition thereafter unless the prior written consent of the Local Planning Authority is obtained.

Reason: To minimise interference with the privacy of the adjoining occupiers.

- 6 The privacy screens to the first, second and third floor balconies to the western elevation of the approved development shall contain solid screening and shall not be less than 1.7 metres in height unless otherwise agreed in writing by the Local Planning Authority.

Reason: to ensure a satisfactory level of outlook for future residents whilst maintaining a satisfactory levels of privacy for adjoining properties.

- 7 Prior to first occupation, confirmation from the Building Control body to demonstrate that the relevant building has been designed so that mains internal water consumption does not exceed a target of 105 litres or less per person per day for the co-living units, water meters and leak detection systems, shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To promote water conservation and efficiency measures in all new developments in accordance with policy SI 5 of the London Plan.

- 8 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 London Plan policy D14.

- 9 A scheme of sound insulation measures shall be submitted to the Local Planning Authority for approval. The insulation of the separating floor between the retail units and the co-living flats shall be designed to meet the standards of Building Regulations Approved Document E 'Resistance to the passage of sound'. The approved measures shall thereafter be implemented in full.

Reason: Reason: to ensure an effective management of noise in the interest of future occupiers.

- 10 The recommendations and mitigation measures set out in the approved Energy Statement (prepared by JAW Consulting dated December 2021) shall be fully implemented, unless otherwise approved in writing by the Local Planning Authority.
- 11 Occupiers of the co-living units, hereby approved, shall not be entitled to a Residents Parking Permit or Visitors Parking Permit to allow the parking of a motor car within the Controlled Parking Zone (CPZ) operating in the locality within which the development is situated unless the occupier is entitled; to be a holder of a Disabled Persons Badge issued pursuant to Section 21 of the Chronically Sick and Disabled Persons Act 1970. For the lifetime of the development written notification of this restriction shall be included in any licence transfer lease or tenancy agreement in respect of the development. For the lifetime of the development a notice, no smaller than 30cm in height and 21cm in width, clearly informing occupants of this restriction shall be displayed within the ground floor communal entrance lobby of the building, in a location and at a height clearly visible to all occupants. On, or after, practical completion but prior to any occupation of the co-living units, hereby approved, written notification shall be submitted to the Local Highways Authority confirming the completion of the development and that the above restriction will be imposed on all future occupiers of the development.

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

- 12 Notwithstanding what is shown on the approved drawings, at least three spaces for cargo bikes or other non-standard bikes shall be provided for within the cycle store. Thereafter, the cycle storage facilities and refuse storage shall be installed prior to first occupation of that building hereby approved and thereafter retained and maintained for the lifetime of the development. The cycle storage facilities shall not be 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.

- 13 Prior to commencement of above ground works, details of the proposed green and sedum roofs (and a scheme of management and maintenance), shall be submitted for approval in writing by the Local Planning Authority. The approved details shall be implemented prior to first occupation of the co-living units.

Reason: To ensure that the ecological value of the site is enhanced post development and to ensure the development provides the maximum possible provision towards the creation of habitats and valuable areas for biodiversity and to enhance the character and appearance of the area.

- 14 Prior to commencement of above ground works, further details of all exterior materials including samples to be provided on site for inspection and/or manufacturer's literature shall be submitted to and approved in writing by the Local Planning Authority. Such details shall include but not be limited to:

- (i) building envelope materials e.g. bricks, render, cladding;
- (ii) windows, doors and glazing systems including colour samples;
- (iii) balconies and screens; and
- (iv) solar PV panels.

The works shall be carried out in accordance with the approved details and shall be retained thereafter for the lifetime of the development.

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

- 15 Prior to the commencement of the development a Construction Method Statement 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.

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

- 16 Prior to the commencement of construction on site, the developer shall join, and for the period of construction, adhere to the requirements of the Considerate Constructors Scheme for the relevant part of the Development.

Reason: To ensure that throughout the construction process, appropriate regard is given to protecting neighbour amenity and the natural environment.

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 government website:
<https://www.gov.uk/government/publications/preventing-and-resolving-disputes-in-relation-to-party-walls/the-party-wall-etc-act-1996-explanatory-booklet>
- 3 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.
- 4 The Council recommends that the maximum standards for fire safety are achieved within the development.

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