

COMMITTEE REPORT

Planning Committee on
Item No
Case Number

7 August, 2024
04
21/2587

SITE INFORMATION

RECEIVED	5 July, 2021
WARD	Kilburn
PLANNING AREA	Brent Connects Kilburn
LOCATION	Hereford House and garages, Carlton Vale & Exeter Court, Cambridge Road & Open Space and Play Area, Granville Road, London, NW6
PROPOSAL	Full planning application for the demolition of the existing Hereford House and Exeter Court buildings and the construction of four new residential buildings ranging from 3-13 storeys, the provision of flexible non-residential floorspace at ground floor of Block C1, a new public urban park and new access road along the western side of the site, cycle and blue badge car parking and associated infrastructure
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_155987</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 "21/2587" (i.e. Case Reference) into the search Box3. Click on "View Documents" tab

RECOMMENDATIONS

That the Committee resolve to GRANT planning permission subject to the application's referral to the Mayor of London (Stage 2 referral).

That the Head of Planning is delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

Conditions

1. 3 Year Time Limit
2. Approved Drawings/Plans
3. Affordable Unit Mix
4. Private Unit Mix
5. Accessible Homes
6. Refuse and Cycle Stores
7. Commercial Floor Area
8. Resident Access to Communal Courtyard
9. Public Access to Open Space
10. Non-Mobile Machinery
11. Water Consumption Targets
12. Fire Evacuation Lifts
13. Flood Risk Assessment and Drainage
14. Fire Safety Strategy
15. Materials – Samples
16. Materials - Construction Details
17. Nominations Agreement
18. Highways Works
19. Energy Assessment
20. South Kilburn District Heat Network
21. Overhearing
22. Wind/Micro Climate Mitigation
23. Mechanical Plant
24. Internal Noise
25. Contamination
26. Construction Method Statement
27. Construction Logistics Plan
28. Thames Water Piling
29. Bat Survey
30. Details of Satellites
31. External Lighting
32. Arboricultural Impact Assessment and Method Statement
33. Landscape Design
34. Parking Management
35. Circular Economy
36. Digital Connectivity
37. TfL Contribution
38. Brent Parks Contribution
39. Whole Life Carbon
40. Training and Employment
41. Peregrine Falcon Surveys
42. Delivery and Servicing Plan

Informatives as listed in the Committee Report.

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.

That the Committee confirms that adequate provision has been made, by the imposition of conditions, for the preservation or planting of trees as required by Section 197 of the Town and Country Planning Act 1990.

SITE MAP

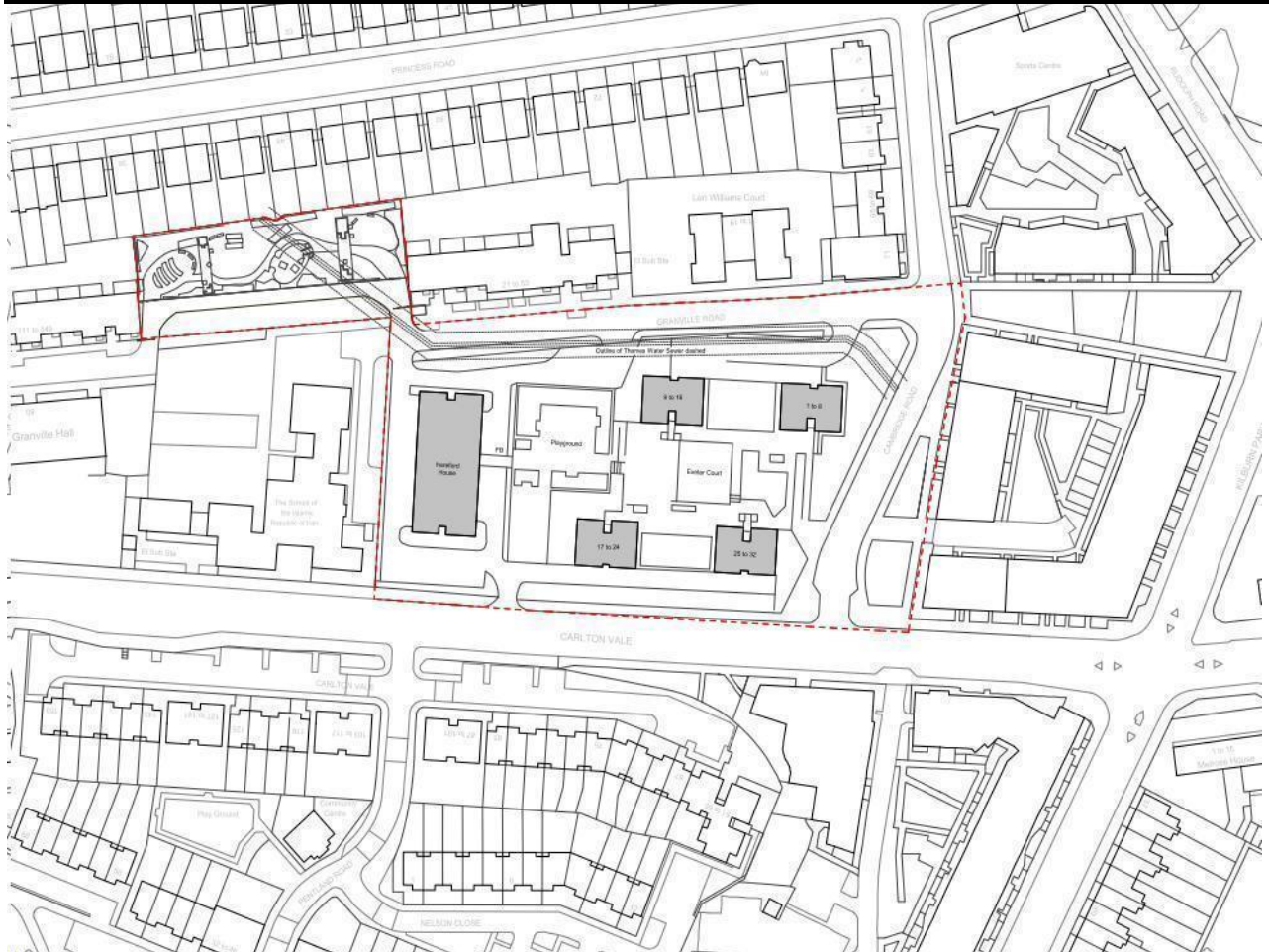


Brent

Planning Committee Map

Site address: Hereford House and garages, Carlton Vale & Exeter Court, Cambridge Road & Open Space and Play Area, Granville Road, London, NW6

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This map is indicative only.

PROPOSAL IN DETAIL

The development proposes the demolition of the existing Hereford House and Exeter Court buildings and the construction of four new residential buildings ranging from 3-13 storeys, the provision of flexible non-residential floorspace at ground floor of Block C1, a new public urban park and new access road along the western side of the site, cycle and blue badge car parking and associated infrastructure. An overview of each area is summarised below:

Block A:

A six storey mansion block fronting Granville Road. The building contains a total of 42 social rent homes (8 x 1 bed, 11 x 2 bed, 15 x 3 bed and 8 x 4 bed). The building has rear balconies and access to the rear private communal courtyard shared with Blocks B and C. A residential lobby, refuse stores and cycle stores are provided at ground floor.

Block B:

A six storey mansion block fronting Carlton Vale. The building contains a total of 68 market homes (34 x 1 bed, 22 x 2 bed and 12 x 3 bed). The building has rear balconies and access to the private communal courtyard shared with Blocks A and C. A residential lobby, refuse stores are provided at ground floor.

Block C:

Block C consists of two blocks C1 (13 storeys) and C2 (nine storeys) connected by a one storey ground floor that fills the footprint and bridges the two blocks. The building fronts the public park. The building contains a total of 124 homes. C1 contains all market homes (45 x 1 bed and 28 x 2 bed) while C2 contains 51 social rent homes (29 x 1 bed, 20 x 2 bed and 2 x 3 bed). The ground floor contains a large glazed shared lobby which divides into a market residential lobby and social rent lobby, a commercial unit of 135 sqm, refuse stores and cycle stores. A basement would be constructed to provide additional cycle storage for Blocks A, B and C. The building has balconies on each corner of the block and has access to the private communal courtyard shared with Blocks A and B.

Block D

A row of three storey terraced houses with fourth storey pop-up elements. The building fronts the access route on Granville Road. Block D creates 16 social rent homes (8 x 4 bed and 8 x 5 bed). Each house has a front and rear garden with separate refuse and cycle storage.

Landscaping

Significant landscaping is proposed throughout the site. This is predominant comprised of a resident's communal courtyard (1,845 sqm) between Blocks A, B and C and a Public Park (2,400 sqm) between the frontage of Block C and Cambridge Road. The public park contains a playground, a picnic area and an 'Urban Woodland'. The landscaped areas have also been designed to form a part of the surface water strategy. The development is car-free. The site would retain 60 on street car parking spaces along Cambridge Road, Granville Road and a new access road to the western of the site including 8 blue badge parking bays and electric vehicle charging points that will be carried out in line with Transportation requirements under a Highways Agreement.

Amendments since submission

A number of amendments were made to the scheme as a result of comments raised by officers and the GLA/TfL during the course of the consultation exercise as well as updates to Fire Safety Regulation and changes in viability.

The main changes to the scheme when compared to the initially submitted scheme are a result of updates to Fire Safety Regulation Standards and London Plan Guidance. This effected the internal and external arrangement of Blocks A, B and C. The alterations also alter the housing layouts on the residential floors of the proposed blocks and changes at ground floor level to communal and ancillary spaces in order to accommodate the different core geometry.

The housing tenure and unit mix was also reviewed. The South Kilburn Housing Need Assessment review identified that a larger number of smaller units are required to facilitate the decant of residents from future phases of the masterplan. The Hereford and Exeter project continued to face significant viability issues. The

intermediate affordable units have been removed from the scheme in lieu of private tenure units. The provision of social rent affordable housing has therefore been maximised for those most in need and assists the viability position for the scheme.

As a result of these amendments a number of updates were required to the scheme:

- The change in unit numbers, size and tenure mean that there is a slight reduction in child yield and therefore the required play space provision
- The increase in the footprint of the buildings to accommodate fire safety requirements has resulted in a reduction to the soft landscaping measures within the private courtyard and Urban Greening Factor score
- A slight reduction in size of the Public Open Space provided at 2,400 sqm
- Increase in quantum of cycle parking spaces
- The daylight, sunlight and overshadowing assessment has been updated to reflect the alterations to the massing
- The commercial and residential refuse arrangements have been changed to reflect the new layouts.

EXISTING

The application site is located in within the South Kilburn Estate, at the southern end of the “Heritage Quarter”. The site includes Hereford House, Exeter House, and the Granville Road Play Area and covers an area of approximately 1.57 hectares and is bound by Carlton Vale to the south, Granville Road to the north, Cambridge Road to the east, and Islamic Republic School of Islam to the west.

It covers an area of approximately 1.57 hectares and currently contains 167 residential units, comprised of a mixture of local authority secure tenants and owner/occupiers leaseholders and 3,750sqm of storage/warehousing floorspace.

The site comprises buildings of between 1 and 18 storeys and prior to their vacancy, accommodated both residential and commercial uses.

SUMMARY OF KEY ISSUES

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

Representations Received: 5 responses were received including 1 objection, 3 neutral comments and 1 letter of support. Further details of the comments received are discussed within the Consultation section below.

Principle: Having regard to the to the aspirations of the South Kilburn Masterplan, the result of the 2019 Residents Ballot, and Site Allocation Policies BSESA8 Hereford & Exeter Court and BSEAS11 Old Granville Open Space, which has allocated the site for mixed tenure housing and a new open space, the principle of the redevelopment of the site is accepted.

Height, Layout and Design: The development proposes buildings ranging from 3 to 13 storeys. The site is within a designated tall building zone. At its highest part (13 storeys), the Block C1 would be a storey taller than envisaged by the South Kilburn SPD. However, officers consider that the applicants have successfully demonstrated a logical and robust approach to the height and massing, arranged around landscaped areas with the tallest element adjacent to the proposed park. The proposed buildings also sit lower than the existing Hereford House. A visual impact assessment has been submitted, which demonstrates that the buildings would meet several key criteria covering likely visual, functional and environmental impacts, and therefore meet the requirements of London Plan Policy D9. In terms of design, the buildings are well arranged with attractive façade compositions contributing to a strong streetscene character.

Heritage Assets: The development site, whilst not occupied by any heritage assets, sits near to the South Kilburn Conservation Area and to various listed buildings within the Conservation Area, the grade I listed Church of St Augustine. Although elements of the scheme will be visible from within the Conservation Area and the listed Church, it is considered that in heritage terms, no harm arises to the identified heritage assets.

Affordable Housing/Unit Mix: The existing site has 150 social rent properties. The proposed development would provide 109 (44%) social rent homes (51% by habitable room). Whilst there would be a net loss in social rent homes, there would be a net increase in socially rented floorspace, 957 sqm. The scheme would meet targets set out in policy but has been demonstrated to represent the maximum reasonable proportion of Affordable Housing. In terms of dwelling sizes, 53 of the dwelling proposed will be family sized, equating to 21.2%. While this falls short of policy targets, (which would require 62.5 homes) it is a net increase of 20 dwellings overall and 15 net social rent units. The unit mix balances the affordable housing provision and reflects the updated Housing Needs Assessment for the South Kilburn area and is considered acceptable on this basis.

Quality of Residential Accommodation: The residential accommodation proposed is of sufficiently high quality, meeting the particular needs and requirements of future occupiers. The flats would predominantly be dual aspect (67% of homes) providing good outlook and light. The amount of external private/communal space meets London Plan requirements but does not fully meet Brent's numerical requirements set out within policy BH13, however, the development provides good quality amenity space and a new Urban Park adjacent to the new homes and as such this is considered of sufficient quality and provides a variety of external communal spaces and on-site play for future occupiers.

Impact on Neighbouring Properties: The development would have some impact on the neighbouring properties, largely in terms of loss of daylight and there would be some shortfalls against BRE guidelines, in particular to the properties to north on Granville Road. However, the applicant has demonstrated in their submission that existing building arrangement and features of these affected homes have restricted access to light, including projecting balconies and the properties being low lying which distort the reported values. The level of impact is not considered to be unduly detrimental given the general high level of compliance given the urban nature of the scheme. The overall impact of the development is considered acceptable, particularly in view of the wider benefits of the scheme in terms of the Council's strategic objectives.

Transport: Out of the 66 existing car parking spaces, 60 will be re-provided in the form of on street car parking bays. There will be no private car parking and the on street spaces will form part of the two Controlled Parking Zones (CPZ) surrounding the site including 8 blue badge parking bays. The car parking spaces are for existing social rented occupiers within the South Kilburn Regeneration Area who are vehicle owners and have the right to return. The car parking spaces will be removed once they become redundant, replacing these as disabled car parking bays or converting to public realm. Otherwise, new market tenure dwellings would be subject to a 'car free agreement'. Cycle parking has been proposed to meet London Plan standards with some spaces allocated internally. Contributions are also sought by TfL towards improvements to bus services. The proposal is considered to be acceptable in relation to the potential transportation impacts subject to the conditions and obligations set out within the recommendation section of this report.

Landscape, Ecology, Biodiversity and Flooding/Drainage: There are 39 trees on site. There would be a net increase of over 100 trees on site, with 45 of these planted within the Granville Urban Park and new street trees on Carlton Vale and Granville Road. The site is not within any designated ecological assets. The site achieves an urban greening factor of 0.33 which falls short of targets but this will be maximised through the application site with final landscaping details secured via condition. Flood risk has been assessed, and the site represents a betterment reducing surface water run off to greenfield rates. Sustainable Drainage Systems (SuDS) measures are proposed to address surface water management, with further details of the drainage strategy to be secured by condition(s).

Environmental Impact, Sustainability and Energy: The measures outlined by the applicant achieve the overall required improvement on carbon savings within London Plan policy, further clarification of some matters is sought by the GLA ahead of a Stage 2 referral. 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 existing/future residential occupiers.

RELEVANT SITE HISTORY

None.

CONSULTATIONS

Public Consultation

675 neighbouring properties were notified of the application included addresses on Cambridge Road,

Cambridge Gardens, Carlton Vale, Hansel Road, Kilburn Park Road, Princess Road, Rudolph Road and Hansel Road. Initial consultation was sent on 14/07/2021. A further round of consultation to neighbouring properties was sent 26/02/2024 following the scheme alterations with submission of revised plans and documents.

In addition, site notices were displayed at the site and a press notice placed in the local paper.

As a result, a total of 5 representations were received: 1 objection, 3 neutral comments and 1 comment of support.

Submitted comments are summarised in the table below:

Public Comments	Officers Response
<i>Flood Risk and Drainage</i>	
Increase risk of flooding in local area and in turn the neighbouring properties	The application has been accompanied by a drainage strategy and FRA to demonstrate how the development has been designed to minimise flood risk. The development includes green roofs and SuDS to achieve a reduction in surface water run off over the existing arrangement. Please see Flood Risk and Drainage section of the report (Paragraphs 246-261)
Concerns regarding the new buildings have flat roofs and additional hard surfacing.	
<i>Housing</i>	
In support of new residential building	This is noted.
Concerns regarding loss of council flats	The proposal does result in the net loss of social rented homes, however there is an increase in socially rented floorspace. Please see Estate Regeneration section of the report (Paragraphs 1-5)
<i>Transport and Highways</i>	
Support for cycle store and blue badge parking	This is noted.
Support for new access road	This is noted.
Support for on street electric vehicle charging points	This is noted.
<i>Trees</i>	
Request for the mature trees within Old Granville Open Space to be retained where possible to provide privacy for Princess Road residents. Existing trees cannot be effectively replaced with planting	The trees in the existing Open Space close to the boundary with Princess Road gardens have been indicated for removal: T33, T34, T35 and T37. This is to facilitate the construction of the houses in this location. Please see Trees section of the report for more information on Trees (Paragraph 204) and Impact to Neighbouring Amenity section (Paragraph 89) that outlines that adequate privacy will be retained to rear gardens on Princess Road.
Request to retain the mature trees along Carlton Vale. The removal of trees in this location does not support the Carlton Vale tree-lined boulevard vision or good public realm	The trees along Carlton Vale: T4, T5, T6, T7, T8, and T9 have been indicated for removal. This is due to the building line of Block B. Please see Trees section of the report for more information on Trees. (Paragraph 203)
<i>Open Space</i>	
Concerns regarding loss of public open space and proposed fenced courtyard	The proposed courtyard serves as a private amenity space for the proposed dwellings. The current buildings offer limited private amenity space and while the current podium is publicly accessible, the design and layout creates poor

	public realm. The loss of Old Granville Open Space will be re-provided to the east of the site.
<i>Viability</i>	
Comments relating to developer profit and lack of a Financial Viability Assessment (FVA).	A FVA was submitted with the application and the report and relevant inputs have been scrutinised. Please see Affordable Housing section of the report (Paragraphs 16-18).

Statutory/ External Consultees

Greater London Authority (GLA) (Stage 1 response):

The GLA has commented on a number of strategic issues raised by the scheme some of which relate to the initially submitted scheme, which are summarised as follows:

Land Use Principles:

The principle of redeveloping the site is supported in principle. The scheme would result in a small reduction in social rent units compared to existing but an uplift in habitable rooms and floorspace and broadly has followed the principles of the Mayor's Good Practice Guide to Estate Regeneration (GPGER). However, more information needs to be supplied with the Statement of Community Involvement (SCI) to show how residents have influenced the master planning process. Notwithstanding this, the historic loss and potential under-reprovision of social rent housing across the wider South Kilburn estate area needs to be fully explained and justified.

Affordable housing:

The scheme proposes 14% affordable housing by habitable room on the uplift comprising 27% social rent and 73% shared ownership. GLA officers have reviewed the applicant's FVA and the consider the applicants deficit to be significantly overstated. The affordability of these units should be secured as well as the provisions for an early and late stage viability review in accordance with the viability tested route (it should be noted that the scheme has since been amended to include 109 social rent homes (51% by habitable room).

Playspace:

The applicant should identify the areas attributed to playspace within the scheme on a plan for clarity. A financial contribution toward off site 12+ playspace would need to be secured.

Urban Design:

Careful design of the urban park is required to ensure clear physical separation and screening of noise and pollution from the road, and delineation between the open space and pedestrians using the pavement. It is unclear how access to the courtyard is to be controlled. The applicant should indicate how the future layout and public realm approach to the site to the west will relate to the proposed to ensure consistency of landscaping and a safe, high quality pedestrian environment. The ground level units with bedrooms facing directly into the courtyard and street facing are likely to lack a sufficient level of privacy. The applicant should explore the option of introducing duplex units with individual front doors to help activate the public realm and limit the number of bedrooms facing onto the street. The applicant should address functionality points raised and provide an assessment of cumulative impacts in order to conclude the Policy D9 assessment. The fire strategy currently lacks sufficient detail and a revised document should be provided. In particular, a commitment to providing fire evacuation lifts should be made. Comment raised regarding wheelchair accessible housing should also be addressed.

Transport:

The provision of street lighting and wayfinding on-site would be supported. The relevant highway works should be secured via S278 agreement with the Council. Active Travel Zone (ATZ) mitigation should be secured. A bus contribution is requested of £156,000. A mechanism to ensure a reduction in on-site parking as these spaces are no longer needed should be secured. Further details of cycle parking should be provided including commercial parking. A travel plan should be secured as well as the provision of a delivery and servicing plan and construction logistics plan. Concerns have been raised with regards to the servicing and delivery strategy, which would need to be addressed

Other issues on Energy, Circular Economy Whole Life-cycle Carbon, Urban Greening, Flood Risk and sustainable drainage also require resolution prior to the Mayor's decision making stage.

Officer comments: The scheme has since been updated please see amendments since submission section The issues are all addressed in more detail within relevant sections of the main report below.

Transport for London (TfL)

TfL have raised the following conclusive comments:

- A revised ATZ assessment should be submitted.
- Has the green pedestrian link past Cambridge Gardens Triangle to Kilburn Park Underground Station been examined under the healthy streets criteria of "people feel safe"?
- A contribution towards bus service enhancements should be secured.
- The loading and servicing strategy should be altered.
- Improvements to the cycle parking at this site is required.
- A Parking Design and Management Plan, Travel Plan, Delivery and Servicing Plan, Construction Logistics Plan should be secured through this application and/or by condition as appropriate.

Officer comments: These issues are all addressed in more detail within relevant sections of the main report below.

Thames Water

A piling method statement condition should be secured from the developer by condition, prior to the undertaking of piling operations. Otherwise, no objections raised.

Westminster City Council

Raised no objections to the proposals.

Internal consultation

Environmental Health

Environmental health have raised no objections subject to a number of conditions relating to Air Quality, Construction Noise and Dust, Non Road Mobile Machinery and Contaminated Land See detailed considerations section of report for further comments on these issues.

Statement of Community Involvement

A Statement of Community Involvement (SCI) has been submitted with the application, sets out the public consultation and level of engagement undertaken before submitting the application, as required through the Localism Act (2011).

The SCI details the range of consultation events and communications and activities entered into between April 2018 and March 2021.

The communication strategy for the project was both online and offline. The traditional methods including flyering and posters to advertise events. Flyers were sent to all households, organisations and businesses within a 250m radius of the project site. After the first public exhibition, posters were put up in key locations to attract more people to the events. A website was set up, www.herefordandexeter.co.uk, to keep people up to date about events and key programme dates. People could sign up to receive news about the project and all online correspondence with the public was managed through this platform.

The Resident Design Group membership was advertised to residents of Austen House who are most likely to be moving in to the new housing. They were sent two letters, it was advertised on the website and at the first public event, as well as on the noticeboard in the Austen House lobby. During the public events the design team went door-knocking and flyering around the venue to attract more people to come to view the proposals and have their views heard and recorded.

The design team worked with independent consultation experts Your Shout, who handled the sign in process, the website communication and processed all feedback. This ensured the independence of the consultation

process and the feedback gathered.

In 2018 there were a total of public events which included three public exhibitions and one workshop with a further exhibition held in July 2019 in support of the ballot process. In February and March 2021, the last exhibition of the final proposals was shown before intending to submit for planning. As this was during COVID-19, this was held online.

Throughout the engagement process, the applicant has noted low involvement with the scheme. To try and counter this the applicant also teamed up with other architects and attended other events where possible, hold exhibitions in a different targeted location and put up posters in key locations to attract more people. The lack of engagement is noted as being potentially due consultation fatigue as the pool for residents also overlapped with other schemes in the locality. In addition, some events took place during the COVID-19 pandemic.

In terms of feedback the first exhibition registered eleven people with six feedback forms collated. Responses highlighted the desire for a small convenience store, more natural spaces for food growing and on site amenities including public community space.

The second workshop held in collaboration with Adam Khan Architects at the Granville Centre in conjunction with the Centre's opening ceremony this meant a healthy footfall benefiting the consultation events. 55 people attended and most people were supportive of ideas around tree-lined streets and slowing down traffic to create quiet, safe and green routes through the area. People were more apprehensive about the ideas around 'play-on-the-way'.

The second exhibition was by 39 people (28 attendee registrations), with 3 that asked to join the Resident Design Group. Generally, the designs were well liked by residents, and most questions and queries tended to be directed towards the Council on the topics of offer and timescales.

The final public exhibition was held over two days at two different locations to maximise attendance. Approximately 25 people attended the event overall, most comments were positive with residents generally happy with the designs. The most frequently asked question was when the buildings would be finished, with residents expressing that they wanted to see the project go ahead. However, the long timescales were disappointing. In terms of other discussion points, this included the maisonettes designed on the current park with concerns raised on the loss of privacy and loss of space for wildlife.

Beyond this, the SCI also provides details of the Resident Design Group, the Ballot Exhibition and the Planning Submission Exhibition

Overall, the feedback gathered did factor into design decisions taken through the scheme. The main feedback that could be incorporated into the scheme was the decision to have sliding doors between the kitchen and living room in social rented properties. Other preferences such as windows raised off the ground, defensible space, bright lobbies and breaks in the building envelope were design principles from the start but were strengthened through the resident feedback.

These consultation events are considered appropriate to the scale of the development and reflect the recommended level of pre-application engagement set out in Brent's Statement of Community Involvement.

These consultation events are considered appropriate to the scale of the development and reflect the recommended level of pre-application engagement set out in Brent's SCI, as well as the Mayor's Good Practice Guide.

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 the

- London Plan 2021
- Brent Local Plan 2019-2041

London Plan 2021

SD10 Strategic and local regeneration
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
D9 Tall buildings
D10 Basement development
D11 Safety, security and resilience to emergency
D12 Fire safety
D13 Agent of Change
D14 Noise
H1 Increasing housing supply
H4 Delivering affordable housing
H5 Threshold approach to applications
H6 Monitoring of affordable housing
H8 Loss of existing housing and estate re-development
H9 Ensuring the best use of stock
H10 Housing size mix
S4 Play and informal recreation
E1 Offices
E2 Providing suitable business space
E9 Retail, markets and hot food takeaways
HC1 Heritage conservation and growth
G1 Green infrastructure
G4 Open Space
G5 Urban greening
G6 Biodiversity and access to nature
G7 Trees and woodlands
S1 Improving air quality
S2 Minimising greenhouse gas emissions
S3 Energy infrastructure
S4 Managing heat risk
S5 Water infrastructure
S17 Reducing waste and supporting the circular economy
S18 Waste capacity and net waste self-sufficiency
S12 Flood risk management
S13 Sustainable drainage
T1 Strategic approach to transport
T2 Healthy streets
T3 Transport capacity, connectivity, and safeguarding
T4 Assessing and mitigating transport impacts
T5 Cycling
T6 Car Parking
T6.1 Residential parking
T7 Deliveries, servicing and construction

Brent Local Plan 2022

BP6 Southeast
BSEGA1 South Kilburn Growth Area
BSESA8 Hereford House & Exeter Court
BSESA11 Old Granville open space
BD1 Leading the way in good urban design
BD2 Tall buildings in Brent
BD3 Basement development in Brent
BH1 Increasing housing supply in Brent
BH5 Affordable housing
BH6 Housing size mix
BH10 Resisting housing loss

BH13 Residential amenity space
BE1 Economic growth and employment opportunities for all
BE6 Neighbourhood parades and isolated shop units
BE7: Shop front design and forecourt trading
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
BT4 Forming an Access on to a Road

Other material considerations

The following are also relevant material considerations:

The National Planning Policy Framework 2023 Planning Practice Guidance

Brent Supplementary Planning Documents

- South Kilburn SPD (2017)
- Planning Obligations SPD (2022)
- Residential Amenity Space and Place Quality SPD (2023)
- Sustainable Environment and Development SPD (2023)
- Brent Design Guide SPD (2018)
- SPD1 Brent Design Guide 2018
- Brent's Waste Planning Guide 2015

Greater London Authority Supplementary Planning Guidance

- Accessible London SPG
- Housing Design Standards LPG
- Fire safety LPG (draft)
- Housing SPG
- Affordable Housing LPG (draft - May 2023)
- Development Viability LPG (draft - May 2023)
- Affordable Housing and Viability SPG
- Play and Informal Recreation SPG
- Air quality positive LPG
- Air quality neutral LPG
- Be Seen energy monitoring LPG
- Circular economy statements LPG
- Energy Planning Guidance
- The control of dust and emissions in construction SPG
- Whole life carbon LPG

DETAILED CONSIDERATIONS

Principle

Estate Regeneration

1. The overarching objectives for estate regeneration, as set out in the Mayor's Good Practice Guide to Estate Regeneration are to: deliver safe and better quality homes for local people; increase the supply of new and affordable homes; and to improve the quality of the local environment through public realm improvements and the provision of social infrastructure. South Kilburn is a designated Growth Area and the scheme forms part of Phase 3b of the South Kilburn Masterplan. The broad aims of the Growth Area, the Masterplan, and that of the South Kilburn SPD are to deliver: 2400 new dwellings (50% for existing secured tenants); retail, health and education facilities; and an improved public realm. In addition, as

noted above, the autumn 2019 Residents Ballot demonstrated an overwhelming level of support for the redevelopment of the South Kilburn Estate. The principle of the redevelopment of this site, within the South Kilburn Regeneration Area is therefore supported.

- The scheme proposes an uplift of 957 sqm affordable housing floorspace from 13,236sqm to 14,193sqm. Of the existing 167 residential units, 150 are affordable dwellings (100% social rent). These will be replaced with 250 dwellings of which there will be 109 affordable dwellings (All social rent). Although there would be 41 less affordable dwellings than existing, there is a significant increase in the provision of family sized dwellings and an increase in floorspace. In addition, the scheme includes the provision of 16 four-bed homes and 8 five-bedroom homes that have the capacity to house larger families which is a benefit given the existing site does not have any provision.

Table 1: Existing and Proposed Unit Mix and Tenure

	Tenure	1 Bed	2 Bed	3 Bed	4 Bed	5 Bed	Total	%Unit	%Hab Room
Ext.	Private	6	4	7	-	-	17	10	
	Social	63	61	26	-	-	150	90	
	Total	69	65	33	-	-	167	100	
Proposed	Private	79	50	12	-	-	141	56	49
	Social	37	31	17	16	8	109	44	51
	Total	116	81	29	16	8	250	100	100

- It is considered that although there is a decrease in the number of affordable dwellings on site, on balance, the increased quantum of affordable housing floorspace and greater provision of family size dwellings which better reflects the identified demand within the South Kilburn Estate, the proposed development has sufficient regard to Policy H8 of the London Plan.
- In terms of overall housing provision, The London Plan (2021) increased the housing targets for London boroughs with the target number for Brent increased to 2,325 per year in the adopted plan. Brent's Local Plan seeks to focus housing growth within its growth areas and site allocations. The site forms site allocation BSESA8 and BSEA11 (Hereford House & Exeter Court and Old Granville Open Space) which are allocated for mixed tenure housing development and new open space with an indicative combined capacity of 220 dwellings. It should be noted that indicative capacities are not normally derived through a detailed design process, and do not act as a maximum (or minimum) number of homes that can be delivered on a site. Applications must be considered having regard to the full suite of planning considerations (discussed in detail below).
- The proposed development would deliver 250 new homes and provide a net uplift of 83 homes. The development would therefore contribute to the delivery of London's housing requirements and the Council's housing target in line with London Plan Policy H1, and policy BH1 of Brent's Local Plan.

Non-residential floorspace

- The ground floor of 1-8 and 9-16 Exeter Court is a garage and commercial storage facility. Whilst the development would result in the loss of the B8 space, the site allocation BSESA8 allocates the use for mixed tenure housing and open space. The loss of the storage space is therefore considered acceptable in this instance.
- Whilst the site allocation does not include non-residential floorspace, given the application exceeds the indicative housing target and is resulting in an uplift in open space (as required by the allocation) there are no objections in principle to the provision of 135 sqm of non-residential floorspace. The provision of this space adjacent the park has the potential to provide natural surveillance and overlooking which would have the benefit of improving feelings of safety. Whilst the use of the floorspace is not explicitly specified, and the need for flexibility is understood, a condition is considered necessary to set out a range of appropriate uses for example uses falling within use Classes E(a)(b)(c)(d)(e)(g) and F2(b).

Urban Park

8. The site allocation BSEA11 requires the Open space to be relocated from the north of Granville Road. The replacement Granville Open Space should be a better quality open space with better sunlight penetration, overlooking/ sense of security and in a more prominent position, which will increase usage. Local plan policy BGI1 requires open space to:
 - be appropriately designed to be accessible, safe, usable and integrated into the development site
 - enhance biodiversity and where adjacent to, integrated into existing green and blue infrastructure network; and
 - include a suitable long-term management plan
9. The new open space would be around 2,400 sqm including areas on both the western and eastern side of Cambridge Road. The existing open space contains approximately 2,300 sqm, including the access path. At present this area is poorly overlooked surrounded predominantly by the side walls and rear garden boundaries of residential properties. The proposed open space would include modern play facilities aimed at a range of ages and would be an improvement in quality in terms of its design and usability. The South Kilburn SPD envisaged open space to the west of site BSESA8 to connect to South Kilburn Open space. Whilst the space is to the east, it is considered the space would connect well into the surrounding route network. It is considered the position, directly adjacent to the entrance to Block C, would increase usage, and the design objectives of providing a space with greater prominence, sunlight penetration, overlooking and sense of security would be achieved. The design of the space is informed by Secured by Design standards, benefitting from good lighting. Whilst CCTV is not to be provided, the applicant's have advised that lighting columns will be designed to allow it to be easily fitted if required. The space would be accessible not only to the adjacent units, but the wider community. It would be divided into areas providing a range of functions from relaxation to play, meaning it would be likely to serve a wide range of users. The biodiversity benefits and features will be discussed further below. A long-term management plan would be secured by condition and the space would be conditioned to be publically accessible.

Affordable Housing

10. London Plan Policies H4, H5 and H6 set out the Mayor's commitment to delivering 'genuinely affordable' housing. The strategic target remains at 50% affordable housing, and a fast track route is provided whereby applications proposing at least 35% affordable housing (50% on public sector or industrial land) with a policy-compliant tenure split. Applications not meeting the criteria for the fast track route are subject to viability testing, to determine the maximum reasonable amount of affordable housing that the scheme can support.
11. Policy H6 requires affordable housing provision to include a minimum of 30% low cost rented homes, allocated according to need and for Londoners on low incomes (Social Rent or London Affordable Rent); a minimum of 30% intermediate products; and 40% to be determined by the borough based on identified need.
12. Brent's Local Plan Policy BH5 supports this approach and sets a target of 70% of affordable homes being for social rent or London Affordable Rent and the remaining 30% being for intermediate products. This split marries up with London Plan Policy H6 by design, with Brent having considered that the 40% based on borough need should fall within the low cost rented homes category. In addition, London Plan Policy H8 excludes Estate Regeneration schemes from following the Fast Track Route, and they are required to follow the Viability Tested Route. A viability assessment has been submitted with the application.
13. The Planning & Affordable Housing Statement Addendum sets out that the social rented floorspace of the existing site is 13,236sqm whilst the social rented floorspace of the current amended proposals would be 14,193sqm which represents an increase of 957sqm, in compliance with London Plan Policy H8. 109 of the 250 dwellings are proposed as social rent units (44%).
14. The following summary is provided below.

Table 2: Housing Tenure

Tenure	No. Homes	Habitable Rooms
Social Rent	109 (44%)	51 %
Market	141 (56%)	49 %
Total	250	100 %

Table 3: Housing Tenure by Block

Block	No. Homes	Tenure
Block A	42	Social Rent
Block B	68	Market
Block C1	73	Market
Block C2	51	Social Rent
Block D	16	Social Rent

15. The scheme would provide 44% affordable housing by unit and 51% by habitable room and a net increase on social rent floorspace as required by London Plan Policy H8. In addition, all of the affordable homes would be delivered as social rent units, thus directly meeting the requirements of those most in need of housing.
16. The proposals have been viability tested. The applicant has submitted a Financial Viability Assessment prepared by Deloitte dated 8 March 2024. The viability of the scheme has been independently reviewed to establish whether the current offer is the maximum reasonable amount. The FVA and the Council's review has also been scrutinised by the GLA.
17. The applicant's financial viability appraisal ("FVA") indicates that the scheme would result in a residual land value ("RLV") of -£37.2m against a benchmark land value ("BLV") of £1. Where the RLV is less than the BLV, a scheme is in deficit, and as outlined above, the submitted FVA is showing the scheme to be in deficit of approximately £37.2 m. Notwithstanding the financial position above, the FVA concludes that the applicant is committed to delivering the scheme and therefore the offer of 44% on-site provision by unit (51% by habitable room) with a tenure split of 100/0. This is therefore, the maximum which can be reasonably provided.
18. There are areas of disagreement regarding some of the provided assumptions. However, the independent review still identified a reduced deficit of £24.5m. On this basis it is considered that the scheme would not be able to contribute towards or provide additional affordable housing. Therefore, the applicant's offer is the maximum reasonable amount.

Housing Size Mix

19. London Plan Policy H10 (Housing Size Mix) expects schemes coming forward to provide a range of unit sizes taking account of local need, the requirement to deliver mixed and inclusive neighbourhoods and a mix of tenures and uses within the scheme.
20. Brent Local Policy BH6 states that the council will seek to deliver a target of 25% of new homes as family sized (3 bedrooms or more) dwellings. For every four dwellings included within developments at least one must be 3 bedrooms or more. Exceptions to the provision of family sized dwellings will only be allowed where the applicant can show that:
 - a) the location or characteristics of the development are such that it would not provide a high quality environment for families, or
 - b) its inclusion would fundamentally undermine the development's delivery of other Local Plan policies
21. In addition, the South Kilburn SPD sets specific standards, with principle H2 outlining out that in order to address the current and future housing need there will be a need to be a replacement of the existing 1 and 2 bed social rent dwellings whilst seeking to achieve at least 25% of dwellings as 3 bed or more. The full unit mix is set out in Table 1. Of the 250 homes proposed, 53 dwellings of the proposed scheme will be family sized (29 x 3-bed, 16 x 4-bed, 8 x 5-bed). This equates to 21.2% of homes, which falls short of the required 25% which would equate to 62 dwellings. It is noted that 38% of the affordable units are family sized.

22. Exception b of policy BH6 set out above allows for exception where the provision would impact the schemes ability to meet other Local Plan policies. The applicant has advised that the reduction in family sized housing (the initial submitted scheme created 25.5% family sized homes) is due to a number of reasons, primarily related to the alterations to the internal arrangements of the blocks required to meet updated fire safety standards. The applicant has also provided information that a recent update to the Housing Needs Assessment for the South Kilburn area also identified that the need for 2- and 3-bedroom social rented units has reduced since the original planning submission and that there is a greater need for smaller units. Specifically, the updated assessment determined that the need for one-bedroom homes within the social rent tenure had increased significantly since the last housing need update (one-bedroom homes comprised less than 10% of the submitted provision previously, but the updated housing need assessment indicates that 50% of the need on the estate was for this size of unit). As such, the slight shortfall is justified in meeting the identified need.

Accessible Dwellings

23. Policy D7 of the London Plan requires that at least 10% of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' and all other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings.'

24. In terms of M4(3) wheelchair accessible or adaptable units, the development would deliver 25 homes, located within Block B and C, to meet the 10% of requirement. The applicant has indicated that these dwellings either meet the needs of occupants who use wheelchairs or allow simple adaptations. This meets the Building Regulations criteria. Brent's Housing team have advised that the provision has been discussed at length with the Occupation Therapist to ensure that adaptations will be tailored to occupants needs. There are wheelchair units across tenure and dwelling size.

25. All but four of the remaining units have been designed as M4(2) dwellings. The four M4(1) units within Block C require stepped access. This is a product of the integration of the new fire escape strategy that necessitates no apartments opening directly onto the final escape route. In addition, the arrangement also provides front doors to key locations not activated by the communal entrances. As this represents minority of the dwellings, this is considered acceptable in this instance.

Quality of Accommodation

26. Policy D6 of London Plan sets out that housing developments should be of high quality design and provide adequately sized rooms with comfortable and function layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures. Part (c) highlights that housing developments should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in Policy D3 Optimising site capacity through the design-led approach than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.

27. Part F of Policy D6 sets out that housing developments are required to meet minimum space standards which apply to all tenures and all residential accommodation that is self-contained.

28. In addition, the South Kilburn SPD requires that:

- The number of dwellings per storey served by each core may not exceed eight to encourage neighbourly interaction and occupier ownership;
- The design must maximise dual aspect dwellings (with a target of achieving more than 50% across a site);
- North facing single aspect dwellings should be avoided, in otherwise unavoidable circumstances only non-family dwellings will be allowed.

29. The scheme creates:

Table 4: Dwelling numbers and aspect

Block	Total units	Single Aspect	Dual/ Multi Aspect	Percentage*
A1	21	0	21	100%
A2	21	0	21	100%
B1	34	12	22	65%
B2	34	12	22	65%
C1	73	24	49	67%
C2	51	16	35	69%
D	16	0	16	100%
Total	250	83	167	67%

*to the nearest digit

30. All units would meet minimum space standards as set out within London Plan policy D6. The proposed layouts are well designed with functional and logical arrangement of rooms. Two thirds of proposed units are dual or multi aspect. In all cases, single aspect units are one bedroom dwellings and no single aspect north facing dwellings. Within all buildings the maximum numbers dwellings accessed from a single core is six flats.
31. In terms of daylight and sunlight, the application has been accompanied by an internal daylight and sunlight analysis. The BRE guidelines contain recommendations for interior daylight. These guidelines set out two criteria for assessing daylight with one being target illuminances from daylight to be achieved over specified fractions of the reference plane (a plane at table top height covering the room) for at least half of the daylight hours in a typical year and the other based on calculating the daylight factors achieved over specified fractions of the reference plane. The submitted report uses the illuminance method which gives the following median illuminances to be exceeded over at least 50% of the assessment points in the room for at least half of the daylight hours: 100 lux in bedrooms, 150 lux in living rooms and 200 lux in kitchens.
32. For internal sunlight, the guidelines state that a dwelling will generally appear to be reasonably sunlight provided at least one main window wall faces within 90° of due south and a habitable room, preferably a main living room, can receive a total of at least 1.5 hours of sunlight on 21 March. This is assessed at the inside centre of the window(s); sunlight received by different windows can be added provided they occur at different times and sunlight hours are not double counted.
33. Within Block A, 116 out of 169 (69%) habitable rooms analysed meet their daylight target value for their room use. In Block B, 160 out of 214 (75%) habitable rooms analysed meet their daylight target value for their room use. In Block C, 239 out of 300 (80%) habitable rooms analysed meet their daylight target value for their room use. In Block D, 91 out of 104 (88%) habitable rooms analysed meet their daylight target value for their room use. Of the rooms worse affected, this is largely due to the design of the building whereby the rooms are recessed in the footprint of the block or positioned to the side of the block and face other proposed blocks within the site. This is also the case of recessed rooms that are adjoining covered balconies. It is considered that this is commonly the case for high density schemes where the benefits of the provision of this external space for each flat outweighs the harm associated with the reduction in daylight that typically does result from this provision. In addition, the side facing rooms towards the courtyard and the other blocks, which have typically been provided as bedrooms. allow the units to be dual aspect, so while the daylight provision is lower, the homes achieve better cross ventilation.
34. In Block A, 37 out of 42 (88%) units meet the sunlight target values. In Block B, 56 out of 68 (82%) units meet the sunlight target values. In Block C, 91 out of 123 (74%) units meet the sunlight target values. In Block D, all 16 (100%) houses meet the sunlight target values. Of the rooms that do not meet sunlight targets this is predominantly due to being north facing or to the due to the design of the building facing into the courtyard. The dwellings would have access to private amenity space and for the case Blocks A to C where some units do not meet target values, they would have access to the communal private courtyard that would receive compliant levels of sunlight.

35. Overall, 787 habitable rooms were analysed, with 606 (77%) meeting their daylight target value for their room units. Overall, 200 of the 249 units analysed (80%) met the sunlight target value. It is important to consider the urban context and density of the development site and Officers consider that the levels of compliance are good for a scheme of this density while balancing other factors such as dual aspect homes, privacy, design and access to private amenity space.
36. In terms of privacy, SPD1 advises that development should ensure a good level of privacy inside buildings and within private outdoor space. Directly facing habitable room windows will normally require a minimum separation distance of 18m, except where the existing character of the area varies from this. Within the site, there are some close relationships between habitable rooms within dwellings in Blocks A, B and C and between blocks. The closest directly facing habitable windows are between the tallest projecting elements within Block C have 15m separation distances which fall short of the 18m guidance. In addition, there are some pinch points between Block A and Block C2. In this case, windows have been angled away and/or have their main outlook north or south, away from the proposed buildings.
37. The urban character of the site is a material consideration and across the scheme where open plan kitchen/living dining rooms are affected these are all dual aspect which would allow for separate outlook. In addition, some bedrooms are afforded dual aspect to avoid conflict between windows. As such, isolated infringements between bedrooms are not considered to affect the overall quality of the accommodation.
38. Outlook would also be very good for the vast majority of units, with views over the private courtyard or urban park. At ground floor units there are units that directly face the street pavement. For Blocks A, B and C, the internal floor level of these dwellings has been raised by 0.75m to improve the privacy for these floor homes. This affects only ten units across the scheme, of which six are dual aspect allowing more private or quiet view across the courtyard or park. This creates some internal privacy while maintaining a sufficient level of natural surveillance across these areas.
39. Therefore, given the arrangement of the blocks and units, it is considered that all units would experience accommodation with good light, outlook, privacy and ventilation.

External Amenity Space

40. Brent Local Plan Policy BH13 sets out that all new dwellings will be required to have external private amenity space of a sufficient size and type to satisfy its proposed residents' needs. This is normally expected to be 50sqm per home for family housing (3 bedrooms or more) situated at ground floor level and 20 sqm for all other housing.
41. Policy D6 of London Plan sets out that a minimum of 5 sqm. of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm. should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m.
42. The South Kilburn SPD expects all new dwellings to provide external amenity space of a sufficient size and type to satisfy future residents' needs. This should be provided through 20sqm for flats and 50sqm for family (3+bed) dwellings, including ground floor flats. Amenity space should be accessible from the main living area and take maximum advantage of sun and daylight. However, it is accepted that due to expected higher densities for a number of sites within the masterplan area, this may not be achievable.
43. Private amenity space would be provided in the form balconies and terraces for all units within Blocks A, B and C. Private amenity space would be provided in the form of gardens for all units within Block D. All of the units would benefit from private external space that would meet the requirements of Policy D6 of the London Plan.
44. In addition, communal outdoor amenity space is provided within the private residential courtyard. This provides additional areas for residents of all tenures within Blocks A, B and C. To the east of the site, the proposed public Urban Park provides additional areas for recreation.

45. The following table provides a breakdown of the proposed quantity amenity space to be delivered on site:

Table 5: Amenity Provision

Total homes	Total Private Amenity (Gardens, Balconies and Terraces) (sqm)	Private Communal Courtyard (sqm)	Combined Private Amenity and Courtyard (sqm)	LB Brent Private Amenity Required (sqm)	Shortfall on BH13 standards (sqm)
250	2432	1845	4227	5570	1343

46. Brent's Residential Amenity Space and Place Quality SPD highlights that the quality of amenity spaces is paramount, with regards to many factors including accessibility, daylight and sunlight, practicality, usability and orientation. The proposal creates a mixture of amenity spaces across the site: private balconies and gardens, private communal courtyard and public open space. These all provide spaces that are beneficial and enjoyable to the residents and are easily accessed from all related dwellings supporting a balance of informal social activity, play along with areas for household activities such as drying washing. The SPD and policy recognises that shortfalls in higher density schemes may be apparent, and this should be balanced with the quality of any private or communal space, the proximity to other areas of open space nearby and internal amenity spaces.

47. In this case, the scheme delivers a communal courtyard that is carefully designed and landscaped along with a new public urban park with a total area of 2400 sqm. Although not for the sole use of future residents, the park would be conveniently located and easily accessible for future residents and would provide an alternative generous area for outdoor recreation.

48. In addition, the scheme is in walking distance of two existing large parks: South Kilburn Open Space and Paddington Recreation Ground. Therefore, while the development would deliver external private amenity space which falls short of BH13 requirements in strict numerical terms, the provision and variety of amenity space within the proposal and surrounding areas is sufficient to meet resident's needs surpassing minimum London Plan standards. Brent's

49. In terms of quality, the private communal courtyard will receive two hours of sunlight on March 21st to 40% of its area. The front gardens and roof top amenity spaces within Block D will also all receive at least 2 hours of sunlight on March 21st. Due to the orientation of the site, the rear gardens of Block D are positioned immediately to the north of the block and will therefore not meet the target values for sunlight amenity. The new Granville Urban Park will meet the target value for sunlight amenity. With the exception one unit all private balconies are accessed via main living spaces (kitchen, living, dining rooms) with level access.

Playspace

50. Policy S4 of the London Plan states that development proposals for schemes that are likely to be used by children and young people should increase opportunities for play and informal recreation and incorporate good quality, accessible play provision for all ages and specifies that at least 10sqm of playspace should be provided per child.

51. The existing site benefits from Granville Road play area, and a separate playground at podium level at the Exeter Court site. Using the GLA's child yield calculator, the scheme is calculated to generate 174 children, which leads to a requirement for 1734.4 sqm of play space. There would be an expectation for the development to deliver 745.8 sqm of Doorstep Playable Space, 589.7 sqm of local playable space and 398.9 sqm of Neighbourhood and Youth Playable Space as set out within the GLA benchmark. The development provides 1845 sqm of Doorstep Playable Space, split between 365 sqm of equipped doorstep play and 1480 sqm of informal doorstep play, all accommodated within the courtyard area.

52. The scheme provides a total of 1910 sqm of Local Playable Space, within 400m walking distance of

every unit in the form of the New Granville Open Park split between 465 sqm of equipped and 1,445 sqm of informal playable space.

53. Finally, the proposal sets out a total of 389.9 sqm Neighbourhood Playable Space 800m walking distance from residents. This would underprovide the required neighbourhood space however it would overprovide doorstep and local space. In addition, the scheme would contribute towards facilities within South Kilburn Open space to the west. This will be achieved through a financial contribution to upgrade existing facilities. The details will be secured in cooperation with Brent Parks service.

Design

54. The NPPF seeks developments of high quality design that will function well and add to the overall quality of the area, responding to local character and history, reflecting the identity of local surroundings while not discouraging appropriate innovation, establishing or maintaining a strong sense of place, and optimising the potential of the site to accommodate an appropriate amount and mix of development. London Plan Policy D3, D4 sets out a design-led approach to new development that responds positively to local context and optimises the site's capacity for growth, supporting higher densities in well-connected locations with Policy D5 seeks inclusive design.

55. Local Plan Policy DMP1 sets out the need for development proposals to be:

(a) of a of a location, use, concentration, siting, layout, scale, type, density, materials, detailing and design that provides high levels of internal and external amenity and complements the locality.

(f) safe, secure and reduces the potential for crime

56. Policy BD1 highlights the need for all new development must be of the highest architectural and urban design quality. Innovative contemporary design will be supported where it respects and complements historic character but is also fit for the future. In delivering high quality design, development proposals will be expected to show how they positively address all the relevant criteria within London Plan design policies and the Brent Design Guide SPD1.

Height and Massing

57. The proposed development is arranged in four separate Blocks: A, B, C and D.

58. Block A is a 6 storey mansion block fronting Granville Road with rear views to private courtyard. Block B sits opposite the courtyard comprised of a 6 storey mansion block fronting Carlton Vale. Block C to the east of the site contains a 13 storey point block and a 9 storey point block adjacent to the proposed new urban park. Block D to the east of the site is a row of three storey terraced houses with fourth storey pop-ups.

59. Blocks A, B and C broadly form a perimeter block arranged around a private amenity courtyard. Blocks A and B are mirrored to create the interlocking courtyard design with the facades cranked to improve overlooking distances. Block D on the site of the Old Granville Park, broadly follows the street pattern alignment of the dwellings on Granville Road. The houses create a well defined street edge to the south elevation.

60. The New Granville Urban Park is arranged to the east of the site. The greenspace links existing landscaping on the east of Cambridge Road and the wider sequence of green open space and public realm linked to the station.

61. The South Kilburn SPD envisaged heights of up to 12 storeys on the site with lower storey elements located to the north towards the conservation area and taller elements fronting Carlton Vale. A variety of heights along the southern, eastern and western frontages was suggested in the SPD to add interest and provide the opportunity for sunlight/day light to penetrate into the internal space and dwellings. In addition, Local Plan policy BD1 designates South Kilburn, as a tall building zone with appropriate heights designated between 1-17 storeys and up to 51m .

62. At a maximum of 13 storeys (39.9m), the proposals would exceed the SPD expectation by a storey,

however, would fall within the tall building zone designation. The tallest buildings are located to the east of the development site responding to existing and emerging development and in alignment with the SPD's aspirations. It is also important to note that the existing Hereford House is 18 storeys in height. The taller elements of the scheme are also positioned adjacent to the proposed park which creates good visual separation to the existing 6-8 storeys at Durham and Gloucester. The corners of Blocks C1 and C2 are gradually cut-away as the buildings rise up which reduces the appearance of the massing. Overall, the proposal defines a collection of well-scaled buildings that relate sensitively, yet robustly, to their respect surroundings and adjacencies.

Layout and Detailed Design

63. The three courtyard buildings, Blocks A, B and C define the street elevations of Granville Road, Carlton Vale, Cambridge Road and the new North/South Connector Road at a variety of heights. Each block offers two circulation cores per block and a centrally located main entrance which offer views from the street through into the shared residential courtyard.
64. At ground floor, the buildings generally provide active frontages. Block A creates a central well-articulated entrance door with two front and two rear residential units at ground floor to animate the streetscene of Granville Road and respond to the existing character to the north of the street. The internal floor levels have been raised by 0.75m to aid in allowing privacy for future residents. In addition, final landscape details will be secured to create a buffer between ground floor dwellings and the streetscene and rear courtyard.
65. Block B has mirrored qualities to Block A, with the front elevation facing Carlton Vale. The central entrance is adjacent to refuse stores creating convenient access. Due to the internal layout, the entrance is surrounded by more ground floor residential units to the streetscene than Block A. In addition to the raised floor levels, planters with defensible space and a concrete upstand have been indicated to protect privacy of habitable spaces. Final details will be secured via condition.
66. Block C is positioned on corner of Cambridge Road and Carlton Vale with its principal elevation towards the public park. The glazed one-story entrance creates a long, welcoming view through to the residential courtyard. The entrance is centrally located between C1 and C2, connecting the street and public realm and courtyard. While Block C does include larger areas for plant and cycle stores at ground floor, the Granville Road corner of C2 is activated by multiple residential front doors and living spaces with windows facing onto the street. In addition, the cycle storage is glazed to facilitate more active frontage. The commercial space entrance on Carlton Vale marks a key corner of C1.
67. Block D proposes a row of 16 terraced houses. The houses provide a well defined street edge to the south elevation with both paired individual entrances, front gardens and kitchen windows which provide passive surveillance.
68. Externally, the façade composition reflects the character of the surrounding area, drawing on similar architectural languages deployed elsewhere across the masterplan; the simplicity creates a sense of civilised urbanity that is underpinned by the robust material palette. A strong approach to materiality has been set out in the Design and Access Statement with a light buff brick proposed for Blocks A, B and D and a warm red brick proposed for Block C. These simple materials are punctuated by coloured glazed bricks, precast concrete and coloured terrazzo, which add visual interest to elements of the façade including plinths, sills, lintels/copings and the linings of communal entrances.
69. The proposals for the communal entrances are considered to be exemplary and demonstrate a much-welcomed sensitivity towards the sense of arrival for future residents, through the entry sequence from pavement to front door; communal entrances are clearly defined and expressed within the wider streetscape and also give a distinct character and identity to each block.
70. The submission drawings include indicative technical sections provided illustrating how specific elements of the façade may be constructed, such as typical windows, typical parapets and typical balconies. These drawings safeguard the quality of the proposal and will inform the determination process that accompanies the discharge of the materials condition post-permission.

Tall Buildings

71. Policy D9 of the London Plan allows for development plans to define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. Policy BD2 of the Local Plan defines a tall building as one that is more than 30m in height above ground-level, seeks, reiterating that They should be of exceptional design quality, consistent with London Plan Policy requirements in showing how they positively address their visual, functional, environmental, and cumulative impacts.
72. The site allocations within the SPD envisions development at that the Hereford and Exeter site would comprise 4 to 12 stories. The proposal therefore exceeds this expectation by 1 storey. The development contains Block C1 which consists of 13 storeys at a height of 39.9m from ground level. The proposal has been accompanied by an assessment of the scheme against the criteria set out within the London Plan Tall Buildings Policy (D9) together with a Visual Impact Study.

Visual impacts

73. The South Kilburn SPD identifies this location as suitable for tall buildings. The tallest buildings reinforce the spatial hierarchy of the local context by marking the location of the commercial unit and the entrance to the new greenspace. It also marks the end of Carlton Vale and establishes the route up to Kilburn Park Underground Station. The architectural quality and robust detailing will ensure the tall buildings maintain their long-term appearance and architectural integrity. The visual impact study provides two medium range views from the north and north-east. The tallest block can be perceived from one of these locations, but the lower blocks are completely obscured. These views and demonstrate that there is no harmful impact on nearby local heritage assets. The tall buildings will replace existing poor quality taller buildings on site. The proposed development would improve the condition of the existing site and respond appropriately to the local context and status within a regeneration area. The proposed development replaces low quality buildings with high quality architecture. The proposed materials, predominantly brick and pre-cast concrete do not incorporate reflective materials which would cause adverse glare. Overall, the visual impacts of the proposed tall buildings are considered acceptable.

Functional impacts

74. The internal design of the building has altered given updated fire safety requirements meaning a secondary stair core has been incorporated into all blocks over 18m. The submitted documents outline that buildings would comply with relevant fire safety regulations including construction detailing and building materials.
75. The building will be serviced, maintained and managed by the London Borough of Brent, to ensure the preservation of the safety and quality of the buildings.
76. The entrances, access routes and the ground floor commercial unit have all been designed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding area. The tallest elements of the development in Block C are adjacent to the park which allows for a generous open entrance and access routes. The arrangement of ground floor uses and interaction with wider access points including Kilburn Park Station and the public realm has also been carefully considered and would be of a high quality. The proposal has been assessed by Transport for London (TfL) to ensure the quantum of development can be absorbed into the local transport network. A contribution of £266,500 towards bus services has been requested. The proposed site is well served by the local transport network (PTAL 6a) and sits adjacent to a new cycle route along Carlton Vale.
77. In terms of jobs and economic activity, it has been demonstrated that the mixed-use scheme would deliver wider public benefits, both on site through affordable housing and commercial unit provision, and through new jobs created via the construction of the development itself.
78. Finally, the proposed development is not considered to have an adverse impact on aviation, navigation, telecommunication or solar energy generation. Overall, the functional impacts of the proposed tall

buildings are considered acceptable.

Environmental impacts

79. The submission has been accompanied by a Wind assessment along with a Daylight and Sunlight Report. The assessment concluded that with the implementation of the landscaping scheme, wind conditions would largely be suitable for pedestrians. There were entrances on the western façade of Blocks A and B that would require further mitigation, in the form of solid or perforated side screens. These will be secured through conditions. As outlined above, the development provision of sunlight to amenity spaces has been maximised, and while there is some impact in terms of daylight reduction and increased overshadowing to adjoining buildings, overall these are acceptable in the context of largely urban buildings in an intensification area.
80. With regard to air quality and movement, the layout of the proposed buildings with the separation between the respective blocks and air flow through the courtyard. The dispersion modelling indicates that the air quality is acceptable without the implementation of protective mitigation techniques to protect future amenity. Natural ventilation and openable windows throughout all residential units is possible and will not influence the heating/cooling strategy. A noise assessment has been submitted and outlines robust glazing would ensure noise levels within the development would be acceptable.
81. Overall, the environmental impacts of the proposed tall buildings are considered acceptable.

Cumulative impacts

82. The site's location in a Growth Area has to be taken into consideration. The daylight and sunlight assessment included the adjacent recently constructed Gloucester House and Durham Court and this scheme was also considered from a wind microclimate perspective. In addition, the existing tall buildings on site are a factor when considered the cumulative impact of the development.

Summary

83. Overall, the tallest building within the development Block C1 (13 storeys) does exceed the South Kilburn SPD expectation of up to 12 storeys on the site. However, given that the site is within a tall building zone, the proposed buildings are not particularly tall, and that there are relatively tall existing and emerging developments in the vicinity, the development is unlikely to be particularly prominent in the wider area. In terms of visual impact, the siting and detailing of the buildings does not give rise to concerns. The functionality or environmental impacts of the buildings also are not considered to compromise internal or external spaces within and surrounding the site. The proposed heights are considered in the context of the wider benefits which would be delivered by the scheme.

Heritage Considerations

84. The Planning (Listed Building and Conservation Area) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decision. In relation to listed buildings, all planning decisions 'should have special regard to the desirability of preserving the building or setting or any features of special architectural or historic interest which it possesses.
85. The NPPF sets out in paragraph 200 that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage asset affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
86. Local planning authorities are instructed to identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset). (Paragraph 201)
87. The decision-maker should consider each of the designated heritage assets, which would be affected by the proposed development in turn and assess whether the proposed development would result in any

harm to the significance of such an asset. The assessment of the nature and extent of harm to a designated heritage asset is a matter for the planning judgement.

88. The NPPF (paragraph 206) states that any harm to, or loss of, the significance of a designated heritage asset requires "clear and convincing justification". The NPPF expands on this by providing (paragraph 207) that planning permission should be refused where substantial harm or total loss of a designated heritage asset would occur, unless this is necessary to achieve substantial public benefits that outweigh that harm or loss, or unless all the four tests set out in paragraph 207 are satisfied in a case where the nature of the asset prevents all reasonable uses of the site. Where less than substantial harm arises, paragraph 208 of the NPPF directs the decision-maker to weigh this against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
89. Policy HC1 of the London Plan states that development should conserve heritage assets and avoid any harm which also applies to non-designated heritage assets.
90. Brent's Policy BHC1 sets out that proposal for or affecting heritage assets should:
 - a) demonstrate a clear understanding of the archaeological, architectural or historic significance and its wider context;
 - b) provide a detailed analysis and justification of the potential impact (including incremental and cumulative) of the development on the heritage asset and its context as well as any public benefit;
 - c) sustain or enhance the significance of the heritage asset, its curtilage and setting, respecting and reinforcing the streetscene, frontages, views, vistas, street patterns, building line, siting, design, height, plot and planform and ensure that extensions are not overly dominating;
 - d) contribute to local distinctiveness, built form, character and scale of heritage assets by good quality, contextual, subordinate design, and the use of appropriate materials and expertise, and improving public understanding and appreciation;
 - e) seek to avoid harm in the first instance. Substantial harm or loss should be exceptional, especially where the asset is of high significance. Any proposed harm to or loss of a heritage asset (including to its setting) should require clear and convincing justification and can be outweighed by material planning considerations in the form of public benefits but only if these are sufficiently powerful.
 - f) where demolition is proposed detailed plans for any replacement building will be required to allow consideration of whether the replacement would contribute positively to the character or will be applied to ensure construction of the approved scheme is implemented together with agreed mitigation measures appearance of the area. In cases where demolition is permitted conditions and/or legal agreements will be applied to ensure construction of the approved scheme is implemented together with agreed mitigation measures.
91. Brent's Policy DMP1 and the Brent Design Guide SPD1, provide further guidance on principles of good design. Local Plan Policy BD1 seeks the highest quality of architectural and urban design, including innovative contemporary design that respects and complements historic character.
92. The site is not within a conservation area and does not contain any listed buildings. However, the South Kilburn Conservation Areas located adjacent to the north of Granville Open space. There are also a number of Grade II listed buildings on Princess Road and Cambridge Road to the north of the site. The Grade I Listed Church of Augustine is located to the east of the site on Kilburn Park Road.
93. The submitted Visual Impact Assessment includes views taken from the Conservation Area. The taller elements of the proposal would be visible from some vantage points from within the CA above the existing roof line. However, the proposals will replace a tall building of little architectural merit with a taller rise tower which is more sympathetic in terms of materiality and form. Therefore, it is concluded that no harm would arise to the setting or significance of the CA as a result of the development. In respect of the listed buildings along Princess Road, the development would be completely obscured by Nos. 32-84 Princess Road (Grade II listed) themselves and therefore no harm to their setting or significance would arise. The Grade II listed buildings on Cambridge Road would have views of the tallest building but in comparison to the existing buildings, the scheme is considered to replace a poor quality, more prominent tower with a lower, more attractive, sympathetic development, therefore no harm is deemed to arise from the setting of significance of these buildings.
94. The visibility of the Church of Augustine is better revealed as a result of opening up and realigning Granville Road and the proposed buildings visible in this setting are subservient and sympathetically

designed therefore no harm is considered to arise to the setting or significance of this building. As such the proposals are considered to comply with the provisions of the NPPF, London Plan and Brent Plan Policy.

Impact on Neighbouring Properties

95. SPD 1 states that new development should provide adequate privacy and amenity for new residents and protect those of existing ones and provides a number of guidelines in order to ensure this.

Privacy

96. In terms of privacy SPD1 states that in order to ensure a good levels of privacy inside buildings and within private outdoors space, it states that directly facing habitable room windows will normally require a minimum separation distance of 18m, except where the existing character of the area varies from this.

97. The most sensitively located block is Block D, whereby the rear boundary adjoins the rear garden boundaries of the properties on Princess Road. In this case the buildings have been carefully designed in order to ensure overlooking rear facing windows are set 9m from the rear boundaries resulting in a total distance between overlooking windows of no less than 18m.

98. The front of Block D shares a boundary with the School of the Islamic Republic of Iran. The distance to the school grounds would be a minimum distance of 8.3 m from habitable windows, however it should be noted there are no specific guidelines relating to overlooking distances to schools and therefore this arrangement is considered acceptable.

99. All other blocks would be set at least 9m from the boundaries and total distances to residential accommodation would meet or exceed the 18m requirement.

30 and 45 degree rule

100. The building envelope should be set below a line of 30 degrees from the nearest rear habitable room window of adjoining existing property, measured from height of two metres above floor level. Where proposed development adjoins private amenity / garden areas then the height of new development should normally be set below a line of 45 degrees at the garden edge, measured from a height of two metres.

101. Due to the arrangement and the nature of the site, the buildings are predominantly bound by existing roads namely Granville Road to the north, Cambridge Road to the east and Carlton Vale to the south. In addition, the tertiary access road to the west separates the Islamic Republic of Iran School.

102. In comparison, Block D and associated gardens are bordered the rear gardens of 36-56 Princess Road, flank wall and boundary of 53 Granville Road and 111 Granville Road. Given the nature of the site, it is considered appropriate to only apply this guidance to Block D as these are the only dwellings that adjoin privacy amenity space. Whilst the dwellings would be 3 storeys in height, they would be set in 9m from the boundary with the rear gardens of Princess Avenue and there would be a minimum distance of 21m between rear elevations. The proposed building envelope of Block D, therefore complies with the 30 and 45 degree rule when measured from the rear gardens and windows of Princess Road properties. In the case of Granville Road, the new properties run parallel to the existing homes, respective of the building arrangement.

Daylight/sunlight

103. The application has been accompanied by a daylight and sunlight assessment which assesses the impact of the proposal on surrounding residential properties. SPD 1 supports the use of 'Site Layout planning for daylight and sunlight: a guide to good practice' produced by BRE. Where buildings would be within a 25 degree line of existing windows, the Building Research Establishment considers that levels of light to these windows could be adversely affected and recommends further analysis of the impacts. A more detailed assessment of daylight and sunlight impacts based on the BRE's Site Layout Planning for

Daylight and Sunlight (BRE209) 2022 guidance is required where the 25 degree test is not met.

104. The BRE Guidelines recommend two measures for daylight. Firstly, the Vertical Sky Component (VSC) assesses the proportion of visible sky that is visible to a specific point on the outside of a property, which is directly related to the amount of daylight that can be received. It is measured on the outside face of the external walls, usually at the centre point of a window. Secondly, the No Sky Contour or Daylight Distribution assesses the area of the room at desk height (850mm height from floor level) from which the sky can be seen.
105. The guidance suggests that the existing daylight may be noticeably affected by the new development if:
- Windows achieve a VSC below 27% and are reduced to less than 0.8 times their former value; and / or
 - Levels of NSL within rooms are reduced to less than 0.8 times their former values.
106. In this case, as the layouts are assumed or unknown for many properties, the daylight distribution (NSL) is indicative only and the VSC results therefore take precedence.
107. To assess impacts on sunlight to existing south-facing windows and amenity spaces, assessment of Annual Probable Sunlight Hours (APSH) is recommended. The guidance sets a target for windows of 25% of total APSH including 5% in winter months for windows (WPSH), and for amenity spaces to receive at least two hours sunlight on 21 March and not less than 0.8 times their former value.
108. However, the BRE also recognises that different criteria for daylight and sunlight may be used in dense urban areas where the expectation of light and outlook would normally be lower than in suburban or rural areas, and support the use of a 'mirror image' analysis in such cases. The NPPF 2021 also supports a flexible approach to applying standards in order to make efficient use of sites. For the proposed development, the site is allocated and therefore a degree of density is expected to meet housing requirements.

21 to 53 Granville Road

109. This is a four storey contemporary building with projecting balconies. In terms of the main living areas (Living/Kitchen/Dining Room or Living/Dining Room), these are often served by two or more windows where least one window remains fully compliant with BRE targets. For those that do not, Room 10 on the first floor retains 0.68 times and 20% VSC, second floor Room 9, where the main window retains 0.69 times existing value and 16% VSC and third floor Room 6 which retains 0.76 times former value and 26% VSC for the principle window. In all cases, these are not considered major infringements. The submitted report advises that an alternative target value of 15% VSC could be considered appropriate in the urban context and it is noted that the affected rooms would achieve this target.
110. The bedrooms would fair less well in terms of retained levels of daylight, however it is important to note that BRE guidance states that these rooms are 'less important'. There would be three bedrooms at ground floor level which would retain VSC in region of 0.57-0.58, some bedrooms at first and second would also be affected but would largely retain VSC of between 0.51 -0.73. Whilst one bedroom window is shown to retain VSC of just 0.23, this is an anomaly as existing situation is poor with a current VSC of 12%.
111. In terms of NSL, of the 44 rooms tested, 12 satisfy BRE criteria. Of the 32 rooms that do not satisfy, 6 suffer an incursion of 20-29%, 3 a reduction of 30-39% and 23 rooms experience a greater than 40% reduction. The worse affected rooms (R9 Ground Floor Bedroom and R10 First Floor Living/Dining Room) are heavily obstructed by an overhanging balcony which will inhibit the penetration of daylight.
112. Whilst there are a number of losses beyond BRE targets, the main living areas which appear to be dual aspect are shown to retain good levels of light, and the majority of bedrooms would also be unaffected or suffer small infringements. The reductions occur often in places where the windows in question are obstructed from balconies or where there is a second windows which meets values. Overall, the retained levels of light are considered acceptable and it should be noted that the low level nature of the existing adjacent site would mean that losses beyond 0.2 would likely be unavoidable.

113. In terms of sunlight, 24 of the south facing windows are main living rooms. 18 meet BRE guidance. Of the six non-compliant windows, one is a secondary window that achieves targets and a further four retain suitable APSH but retain less than 5% during winter months. The remaining ground floor window retains 16% APSH and 5% WPSH. Of the six affected windows, four are obstructed by overhanging projections. As with daylight, the low level dwellings at 21 to 53 Granville Road in close proximity to the development site would likely experience infringements for any residential intensification especially with regards to winter sunlight where the siting of buildings on the application would obstruct the sun.

111 Granville Road

114. This property is located adjacent to west of proposed Block D, next to the existing Old Granville Open Space.

115. All but one of the windows tested meet the BRE guidance for daylight in terms of VSC. The one affected bedroom has a secondary window that retains compliant levels of daylight. As such, the impact is not considered harmful. In terms of daylight distribution (NSL), all windows tested meet necessary requirements. The three south facing windows analysed meet the target values for APSH.

1 to 19 Granville Road/ Len Williams Court

116. This property is a three storey building located to the north of the development site and is use as a retirement housing complex.

117. Of the windows analysed, the majority of windows tested meet BRE target values for daylight in terms of VSC with some experiences some slight improvements (albeit unnoticeable). Of the 18 windows that fall short of adequate daylight, six have additional compliant windows that serve the same rooms. Of the further 12, the windows retain between 0.55-0.72 times their former value ranging from 10-23% VSC. The one anomaly is W8 on the ground floor that serves as the glazed entrance to the property, which does not require consideration in daylight terms. In terms of NSL, of the 42 rooms tested 29 satisfy BRE criteria. Of the 13 rooms that do not satisfy, 1 suffers an incursion of 20-29%, 8 a reduction of 30-39% and only four experience a greater than 40% reduction.

118. The restricted windows suffer losses to daylight in part because of the geometry of the building being recessed behind existing projecting walls either side or at ground floor being restricted by the front boundary treatment. The affected rooms are largely assumed to be bedrooms which BRE guidelines considered 'less important'. On balance, due to the siting and low level of Len Williams Court, any additional development on the site would likely obstruct some daylight to these properties. The losses incurred are considered acceptable when weighed against the benefits of the scheme.

119. Of the 44 south facing windows analysed, 37 meet the target values for sunlight in terms of APSH as set out in the BRE Guidelines. Of the seven remaining windows, two meet for APSH across the whole year (but not during the winter months) while a further four windows retain between 21% and 23% APSH across the whole year. These are considered minor infringements. The last window is W8 at ground floor which serves the entrance way,

71 Cambridge Road

120. 71 Cambridge Road is sited to the north of the development site, a former pub the property is now a four storey block of flats.

121. All analysed windows meet sunlight and daylight BRE guidelines.

103-117 Carlton Vale

122. This property is a four storey block of flats to the south-west of the site. All windows tested experience retain high levels of daylight, exceeding BRE guidelines. All windows facing towards the development site are north facing and so do not require analysis for sunlight.

87-101 Carlton Vale

123. This residential property is a block of flats located to the south of the development site.
124. All but one of the analysed windows meet BRE guidance in terms of VSC for daylight. The one non compliant window serves the entrance lobby to the building and therefore the loss is not considered harmful. There are additional windows that suffer a reduction in daylight distribution or no sky contours. With 9 of the rooms tested for NSL, 3 suffer an incursion of 20-29%, 3 a reduction of 30-39% and 3 experience a greater than 40% reduction. One of the rooms that is affected serves the entrance lobby and this in addition, the villa is arranged so that the units are dual aspect with bedrooms facing Carlton Vale and the main living spaces to the rear. As BRE guidelines consider bedrooms 'less important', while isolated rooms would be affected by the development, the dwellings overall are considered to retain sufficient daylight.
125. All windows facing towards the development site are north facing and so do not require analysis for sunlight.

67-85 Carlton Vale

126. These properties are a row of terraced two storey maisonettes to the south of the site.
127. In terms of daylight, 70 windows have been assessed across these properties. In terms of VSC, 42 windows suffer transgressions beyond BRE guidelines. Of these windows the majority (28) are small glazed panels located within the entrance doors therefore do not require analysis for sunlight. The remaining windows retain between 0.73-0.79 times their former value 22%-26% which considering the urban context of the scheme is considered appropriate levels of daylight.
128. In terms of daylight distribution, 50 rooms were tested for NSL, with 17 rooms satisfying BRE criteria, 4 suffering an incursion of 20-29%, 12 a reduction of 30-39% and 17 experiencing a greater than 40% reduction. Discounting the windows within front doors which serve hallways, there are some additional rooms affected beyond the VSC calculations at first floor. These affected windows serve obscure glazed high level bathrooms along with bedrooms so are considered less significant in the loss of daylight. All the maisonettes are dual aspect with main living rooms to the rear away from the proposed development. On balance, the properties as a whole would not be adversely affected.
129. In terms of sunlight, all windows facing towards the development site are north facing and so do not require analysis.

1- 26 Chase House

130. 1-26 Chase House is a block of flats located to the south of the site. The majority of the windows analysed meet the target values for daylight in terms of VSC. Six windows suffer minor infringements with windows receiving between 0.71-0.78 times their former value 14%-25% VSC. These windows serve bedrooms, small panels of a glazed door and a dual aspect living space that otherwise retains good levels of daylight. As such, the impact is not considered significant.
131. All but one room tested meets the BRE criteria for NSL. The one ground floor window that is affected has a 20 -29% reduction which is considered a minor infringement, however two experience a slight improvement. The impact on this property is therefore considered acceptable.
132. In addition, all but one of the indicative rooms analysed meet the target values for daylight distribution. The two south facing windows analysed meet the sunlight target values.

Princess Road

133. Nos. 32 to 58 Princess are a terraced row of houses located to the north of proposed Block D.

134. Nearly all of the 84 windows analysed retain good levels of light and sunlight, satisfying the BRE guidelines. Four ground floor windows between No.40 and 42 suffer a minor transgression to daylight distribution with 0.78 -0.79 times of their existing value retained. This is not considered to significantly alter their quality.
135. In terms of NSL, 84 rooms were tested with 80 meeting BRE criteria and the remaining 4 experiencing a minor reduction beyond target values. These four affected windows ground floor windows appear to serve only two rooms. At present, the existing properties look onto an open space, therefore although the Block D development meets a 30 degree line, given the unobstructed view at present, the proposal would have an impact of the existing arrangement. Nevertheless, the retained levels of daylight are deemed to be appropriate.
136. In addition, the rear gardens along 32-58 Princess Road will all retain at least 80% of their existing level of sunlight and will therefore be compliant with the recommendations set out in the BRE Guidelines.

The School of the Islamic Republic of Iran

137. In addition to the above properties, the Islamic School has one window which experiences a reduction in daylight (VSC) beyond the BRE Guidelines All windows tested meet the BRE criteria for NSL. However, this property is a school, it is not considered as sensitive to alterations in daylight and on the whole it will remain appropriately well daylit.

Durham Court & Gloucester House

138. The assessment has also analysed the newly constructed development Durham Court and Gloucester House which was proposed when the information was submitted. Of the 169 windows analysed, 144 meet the target values for VSC. Of the remaining windows, 18 windows experience transgressions between 0.79-0.71 times their former value and seven experience transgression between 0.7-and 0.61 times their former value. Some affected windows serve rooms which have at least one other main window which meets the BRE's target values for VSC and others are recessed into the building and under balconies which reduces their outlook and exacerbates the reduction in daylight.
139. In terms of NSL, 78 rooms were tested and only three windows serving two rooms fell short of BRE criteria with only a minor reduction beyond target values between 0.75 and 0.77 their former value. Given that these windows retain target values on VSC and only marginally fall short of BRE guidelines, the dwellings are not considered to be adversely affected.
140. Of the 32 south facing windows serving main living rooms, 26 meet the annual sunlight target values as set out in the BRE Guidelines, while a further three retain at least 70% of their annual sunlight. The three remaining windows are all positioned beneath balconies which exacerbates any reduction in sunlight.

Summary

141. Overall given the high density, urban context, the development is considered to achieve a reasonable degree of compliance with regard to overshadowing and outlook when assessed against BRE guidance.
142. The sunlight/daylight assessment shows that there would be some impacts because of development. In some cases, the impacts would be noticeable and this is partly due to the low-level nature of the habitable rooms affected bordered the site. Although the overall impact on the living conditions of the neighbouring occupiers would not be excessive, due to the likely use of other parts of the dual aspect properties and/or the compliant levels of daylight and sunlight in other areas of the dwellings.
143. Furthermore, the impacts as a result of the development must be weighed against the regeneration benefits of the scheme, which includes provision of additional housing, affordable housing, social rent homes and family homes, as well as an improved pedestrian public realm. The site allocation for Hereford and Exeter and Old Granville Open Space set a combined indicative development capacity of 270 dwellings which the development does not exceed. Therefore, the amount of development and the

envisioned significant growth within the locality of the site is given significant weight. Given the scale of the proposed development and the number of windows affected, officers consider that the daylight and sunlight impacts to neighbouring buildings and external areas are acceptable when seen in the context of the scheme's wider benefits.

Transport and Highways

144. London Plan Policy T6 seeks to restrict car parking in line with existing and future public transport accessibility and connectivity, and maximum parking allowances for residential development are set out in Policy T6.1. Brent's Policy BT2 sets out parking allowances to align with those of the London Plan.
145. Cycle parking spaces must be provided in compliance with London Plan Policy T5 in a secure weatherproof location and in accordance with design guidance set out in the London Cycling Design Standards. Bin storage should allow for collection within a 20 m carrying distance (or 10 m for larger Eurobins), and more detailed guidance on bin storage requirements is given in the Waste Planning Guide.
146. London Plan Policy T2 expects new development proposals to follow a Healthy Streets Approach and include an Active Travel Zone (ATZ) assessment, and Policy T4 requires Transport Assessments to be submitted.

Existing provision

147. Carlton Vale is a local distributor road & bus route with cycle lanes in each direction, Granville Road & Cambridge Road are local residential access roads. The site is within a Controlled Parking Zone with parking restricted on weekdays. Hereford House has 18 garages in an undercroft and Exeter Court has an undercroft garage court which was in use as a self storage business. There are approximately 16 residents permit/ pay & display bays along Cambridge Road & Carlton Vale frontages & 9 permit bays on Granville Road frontage.

Car Parking

148. As the site has excellent access to public transport services (PTAL 6a), there is an expectation under Brent Local Plan Policy BT2 that proposed residential and retail units are car free, side from disabled and operational parking, with standards following the table in Policy T6.1 of the London Plan. Residential proposals delivering 10+ units must ensure that for 3% of dwellings, at least one designated disabled persons parking bay is available from the outset and be able to demonstrate how an additional 7% of dwellings could be provided with a designated disabled persons parking space in future upon request. The South Kilburn SPD sets an expectation for 20% of all spaces to be equipped with electric charging points with the remainder passive alongside disabled persons parking to be provided in line with London Plan standards.
149. Out of the 66 existing car parking spaces, 60 will be re-provided in the form of on street parking bays forming part of the two CPZs surrounding the site. These will be on adopted highways road and the site will not contain private car parking spaces. 20 spaces are proposed alongside a new access road across the western end of the site, of which four are to be marked as wide bays for disabled persons. The remaining spaces are laid out Cambridge Road and Granville Road in a new layout where existing on street car parking takes place. The car parking permits are intended for existing social rented occupiers within the South Kilburn Regeneration Area that are already existing vehicle owners and have the right to return to the proposed development once the development is complete. The applicant will enter into an agreement to prevent car parking permits being issued to market tenure dwellings. Additionally, a monitored travel plan will be secured that would act to remove the car parking spaces once they become redundant, replacing these as disabled car parking bays or converting to public realm to further promote car-free development. The car parking will be monitored, managed and enforced through a Parking Design and Management Plan secured by condition.
150. The proposed provision of four marked spaces along the proposed service road on the western side of the site provides spaces for the western blocks, whilst a further four on-street spaces have been

indicated along Cambridge Road for the eastern Block C. Disabled Blue Badge holders would also be exempt from any 'car-free' agreement. The on-street spaces would only be marked upon receipt of a future request from a resident though and would be marked as standard bays at the outset. A total of eight Blue Badge parking bays represents 3% of the residential units, with a further of 7% (17 spaces) of to be provided by conversion of re-provided Controlled Parking Zones spaces if required at the most appropriate location should the need arise.

151. With the reduction in the number of vehicular accesses to the site, the opportunity is to be taken to extend on-street parking bays on Granville Road, giving an increased total of 28 spaces along the Granville Road and Cambridge Road frontages. These will be incorporated into the existing CPZ regime of residents' permit/pay & display bays.
152. Electric vehicle charge points will be provided to parking bays along the Granville Road, Cambridge Road and the connector road along the western boundary of the site. EV charge points will be integrated into street lighting columns, of which 20% will be active and 80% will be passive charge points. This will form part of the required S278 works for the development.

Cycle Parking

153. The London Plan requires at least 1.5 secure bicycle parking spaces per 1-bed unit and two spaces for larger flats, plus a visitor parking space for every 40 flats. The London Plan requires 1 long stay space per 175 sqm gross external area (GEA) for A1 food retail above 100 sqm and 1 short-stay space per 40sqm for a unit of this size.
154. As such, at least 442 long stay secure spaces are required for the flat along with 6.25 short stay spaces. For the retail unit, one long stay and one short stay are required.
155. The total cycle provision is 477 spaces, this includes the 5% of spaces being large bays for non-standard bikes. Provision will be provided predominantly with two tier stands (220 spaces) with internal stores provided at ground floor within Block A and C and in the basement of Block C. The spaces located at basement level have suitably sized lifts to provide access. The applicant has confirmed that residents of Block B will also have access to the basement store. The remaining stands are provided as Sheffield stands (104 spaces), within flats (98 spaces) or in the back garden for the case of Block D (32 spaces). The remaining 23 spaces are accessible within the ground floor of Blocks A and C. There are 98 cycle spaces are provided internally across flats within Blocks A, B and C. Transport for London (TfL) and the GLA have raised objections in this regard. While the amount of cycle storage areas provided within individual flats is not ideal and does not strictly adhere to London Cycling Design Standards (LCDS) requirements for cycle parking, the applicant has demonstrated that these units exceed the minimum Gross Internal Area (GIA) required to meet space standards while also having sufficient capacity to accommodate the integral cycle parking space alongside dedicated built-in storage in excess of the required standards. The LCDS Chapter 8 guidance does outline that cycle storage inside the home can work well if it is provided over and above the minimum gross internal floor area and minimum storage and circulation space requirements. In addition, the scheme exceeds guidance providing ample opportunity for cycle storage with residents having space inside their flats also having access to the communal stores. As such, the provision is considered suitable to promote sustainable modes of transportation.

Servicing and Deliveries

156. London Plan policy D3 states that development should facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm, and vulnerable road users.
157. London Plan policy T2 states that development should demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance, reduce the dominance of vehicles on London's streets whether stationary or moving, and be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.

158. Policy T7 states that development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.

159. A new loading bay is proposed along the Carlton Vale frontage within easy reach of the refuse stores, in place of four existing parking bays, with replacement on-street parking bays proposed on Granville Road and Cambridge Road. Refuse collection is proposed to be undertaken on-street as per existing situation and the neighbouring residential units. Bin stores will be located close to the street to ensure drag distances are minimised. Swept paths have been submitted which demonstrate that the vehicle will access and egress the site in a forward gear. A further on-street loading bay is also again shown at the southern end of Cambridge Road to serve the commercial unit. Use of these areas will again be managed through a Delivery & Servicing Plan.

160. The Stage 1 GLA comments raised concerns regarding the utilisation of the existing loading bay located on Carlton Vale. However, this arrangement has previously been agreed with Brent Transportation Officers.

161. For the proposed housing terrace (Block D), access for fire appliances through the site will be retained for use in an emergency, but this will not be used by service vehicles. Instead, refuse stores are proposed at either end of the terrace that a refuse vehicle can reach easily from either end of Granville Road and these are within 30m of each of the dwellings.

Pedestrian and Cycle Access

162. For pedestrian access, all entrance cores to the flats will be accessed directly from the adjoining roads, whilst the pedestrian/cyclist link between the two halves of Granville Road will be retained to serve the terrace of houses. The arrangement of the terrace of houses will complement any future reopening of Granville Road to link the two ends of the street, should the land become available in the future.

Highways Alterations

163. With regard to highways, the new road along the western side of the site will have a carriageway with parking bays on either side, plus a footway on its eastern side and a margin on its western side. It will operate one-way southwards, connecting Granville Road to Carlton Vale and suitable 4m kerb radii are proposed at either end to accommodate the swept path of refuse vehicles, as well as to provide a turning area at the western end of Granville Road. The road therefore meets adoptable standards if the applicant wishes to pursue this option.

164. The junction of the new road with Carlton Vale will be opposite the existing junction with Pentland Road, which is not ideal. However, the one-way nature of the new road would eliminate hooking movements of vehicles turning across each other into the two roads, whilst the junctions also emerge onto a speed table meaning traffic speeds on Carlton Vale would be low, so this is not a highway safety concern. For the existing roads surrounding the site (Carlton Vale, Granville Road and Cambridge Road), significant alterations are proposed: (i) widen Carlton Vale to provide a highway verge and widened footway paved in slabs; (ii) widen Granville Road to provide inset parking bays in block paving with tree planting and slab paved footways; and (iii) realign the southern end of Cambridge Road and provide new surfacing as part of an urban park.

165. The alterations to the Cambridge Road are more significant, with the building line of Block C set much further back from the carriageway edge to provide a 45-50m wide urban space spanning the street (replacing the park lost on the playground site). The carriageway is proposed to be realigned slightly at its southern end, but its junction with Carlton Vale will remain in essentially the same location as at present.

166. Further approval of the paving details along Cambridge Road will be required, including demarcation between public and private areas, as the urban park area would not be suitable for adoption as public highway.

167. Whilst the exact extent of the proposed future highway boundaries have still not been specified, the widened lengths of Carlton Vale and Granville Road will again need to be adopted as highway as a minimum, whilst the new one-way link road on the western side of the site would also be suitable for adoption. A joint S38/S278 Agreement under the Highways Act 1980 will again be required to cover all highway works once these have been fully scoped. The submission confirms that the proposed treatment of Carlton Vale is compatible with the boulevard works.
168. For both streets, the proposed tree planting is welcomed, but the proposals will require further detailed approval through the S278 process, as such treatment is non-standard for adopted streets. If not accepted, then reinforced grass may need to be provided instead in some areas, with 2m minimum footway widths maintained.
169. In terms of materials, the carriageway and footways will be repaved in 100mm thick stone sett paving and integrated into the design of the square, with the carriageway level raised up as a shared surface. Kerb details appear to be a 60mm upstand proposed between the footway and carriageway to act as a rainwater trap and to help guide partially sighted persons.
170. The proposed extent of the adopted highway is also unclear. As the urban park will include a coppice, playground and picnic area, it is not suitable for adoption in its entirety. A suitable boundary demarcation will therefore need to be established using the paving or street furniture design to indicate the boundary between the adopted footway and the park area. Whilst this appears to have been done along parts of the route, the extent of the footway behind the parking spaces along Cambridge Road is particularly unclear. It may be that the proposed seating blocks can be repositioned to define the boundary.
171. The proposed footpath along the front of the terrace of houses is to be surfaced in 80mm block paving, which is suitable for occasional use by fire appliances. The route would be suitable for adoption as a useful connection in the pedestrian network.
172. An independent Stage 1 Road Safety Audit has been conducted for the proposed road layout and this has not raised any fundamental matters of concern that cannot be addressed through the detailed design process. One of the issues raised in a number of places is the absence of tactile paving at crossing points in a number of places and this will need to be addresses in the landscaping design.
173. Whilst the exact extent of the proposed future highway boundaries have not been specified, the adoption of the widened lengths of Carlton Vale and Granville Road will need to be adopted as highway as a minimum, whilst the new one-way link road on the western side of the site would also be suitable for adoption. As such, a joint S38/S278 Agreement under the Highways Act 1980 will be required to cover highway works.

Transport Impact

174. The applicant has submitted a Transport Assessment that has been updated throughout the application to reflect the changes to the scheme in terms of unit numbers and build programme.
175. Hereford House comprises 135 dwellings and Exeter Court has 32 dwellings; this equates to 167 residential units. A commercial business, Blue Box Storage, occupies part of the site. The existing secure tenants have been decanted. The existing trip generation is based on 167 residential units and 50 parking spaces the Blue Box storage trip generation is not included for purposes of calculation. The residential travel demand has been forecasted using surveys data extracted from the TRICS database. The trip generation assessment demonstrates that the existing 167 residential units generates 12 vehicle movements within the weekday AM peak hour and generates 8 in the weekday PM peak hour. The trip generation assessment demonstrates that the existing 167 residential units generates 53 public transport movements within the weekday AM peak hour and generate 36 in the weekday PM peak hour.
176. For the proposed residential demand, the assessment is based on the survey data extracted from the TRICS database. The corresponding total person trip rates and net change of residential trips based on the additional 83 units are a total of 49 and 37 trips are expected in the AM and PM peak hours

respectively. While the TRICs sites are comparable in terms of PTAL they all have relatively high parking ratios compared to the proposed development and therefore would inaccurately estimate the vehicle mode share of the Proposed Development. The TRICS mode share has been adjusted to accommodate for this. The resulting proposed residential travel demand demonstrates that the proposed 250 residential units will generate 2 vehicle movements within the weekday AM peak hour and 2 in the weekday PM peak hour. The trip generation assessment demonstrates that the proposed 250 residential units will generate 103 public transport movements within the weekday AM peak hour and generate 70 in the weekday PM peak hour.

177. In terms of the flexible commercial use, the assessment shows that the flexible commercial space will generate 4 staff trips in the AM peak and 4 staff trips in the PM peak hour, with the majority of staff travelling by public transport services (i.e., underground, overground and buses) services. Trips to the flexible commercial space are likely to be pass-by trips undertaken as part of existing trips made by residents living within the development or local areas or visitors. Due to the small unit size, a trip generation assessment has not been undertaken.
178. The existing servicing demand is 8 service trips throughout the day. The proposed 250 residential units will generate an additional 12 delivery and servicing trips through the day. Based on the 97sqm of flexible commercial uses it is expected to generate 4 delivery and service trips a day each.
179. As a result of the limited car parking, the proportion of trips by other modes would increase. The trip generation assessment demonstrates that the proposed residential and flexible commercial use would generate 106 and 72 public transport trips in the AM and PM peak, respectively. Of those public transport movements, 46 are bus trips, 42 are Underground trips and 17 are Rail / Overground trips in the AM peak and 31 are bus trips, 28 are Underground trips and 12 are Rail / Overground trips in the PM peak.
180. Based on Census data, the Transport Assessment shows that bus routes 6 and 98 would be the most used, whilst the Bakerloo line would see additional passengers per hour. Nevertheless, the presence of multiple public transport routes and a significant level of high frequency services, which can accommodate the relatively low number of additional development trips is likely to have a limited impact. The assessment concludes that the impact of the development on the London wide network is expected to be minimal and no changes to the public transport network are deemed necessary to accommodate the development. Transport for London (TfL) consider it necessary to seek a financial contribution towards improvements to the local bus network due to capacity issues. This includes but is not limited to capacity enhancements. Based on the forecast demand and in line with other developments in the area a financial contribution of £266,500 is sought. The final sum will be agreed prior to the GLA's Stage 2.
181. Overall, the proposed development will generate a net reduction of vehicle trip generation and an increase in public transport trips. The forecast trip generation indicates that the majority of trips will travel to / from the site by sustainable modes of transport (walking, underground, bus or rail). The development will generate a net increase in delivery and servicing trips per day (combined residential and retail). Broadly, the overall impact of the scheme is considered to be acceptable, particularly as the 'car-free' nature of the development will limit vehicular trips.

Healthy Streets and Active Travel Zone Assessment

182. The Transport Assessment has been prepared based on the Healthy Streets and Vision Zero approaches. An Active Travel Zone (ATZ) Assessment has been undertaken in accordance with TfL guidance which identifies and assesses key walking and cycling routes in relation to Healthy Streets criteria.
183. The ATZ assessment has been undertaken using three maps:
- The ATZ and all potential active travel destinations
 - Key active travel destinations and routes at a neighbourhood scale
 - Neighbourhood healthy characteristics check
184. Key journeys have been identified and agreed through pre-application consultation discussions with

highways officers at LB Brent and TfL. These include routes to nearby stations, town centres, schools and open spaces.

185. The ATZ was conducted via desktop in January 2021 and TfL requested for this to be updated to current post-covid times and expanded to add the Islamic Centre of England as a CPZ destination. TfL have also requested other venues of cultural significance to be included along with a nighttime ATZ assessment to be carried out. It is noted that this falls beyond the pre-agreed scope. The applicant has provided a revised ATZ that is being reviewed by TfL. This will be finalised prior to Stage 2 referral.
186. Brent Transportation officers recognise that the recommended improvements to the streets in the immediate vicinity of the development will be covered by the proposed highway works, which will deliver a much improved pedestrian and cyclist environment. Some improvements to crossing facilities were recommended further afield, but these will be addressed through other developments within the wider South Kilburn redevelopment.

Travel Plan

187. To help to support the low level of parking proposed on site and promote alternative travel options, a draft Residential Travel Plan has been submitted. As the site is car-free, the 95% of trips are already anticipated to be by non-car modes, so a specific reduction target for car use is not considered necessary; although a target to ensure car use does not rise above 5% should be enshrined. The primary target will therefore be to increase the modal share of cycling trips from 2% to 10% over a five year period.
188. Measures that are proposed to support sustainable travel include the issuing of Travel Packs to residents, the provision of information on noticeboards and leaflets, the provision of broadband and the offer of personalised journey planning. This will be managed by the Travel Plan Co-ordinator.
189. One measure that is not mentioned is the promotion of local Car Clubs amongst residents. This needs to be included and should include free membership for residents for three years to introduce them to the concept. The details of how the Travel Plan will be monitored are also vague, with no commitment to undertake surveys compatible with either the TRICS or i-TRACE survey methodology.
190. As such, while the Travel Plan has been assessed, an amended and improved version needs to be secured via a condition.

Construction Logistics

191. A draft Construction Logistics Plan has been submitted with the application. This assumed that the construction programme is expected to last 30 months and to be completed and full operations by 2025/6, with working hours confined to 8am-6pm on weekdays and 8am-1pm on Saturdays in line with standard practice.
192. It is anticipated that all deliveries will be able to be unloaded within the site, so there will be no requirement for any temporary highway closures (other than for the S278 highway works). A delivery booking system will be established to plan arrivals to avoid peak hours, with the maximum number of deliveries per day confirmed. These will be routed to and from the site via the strategic road network as far as possible and the document has also set out the potential for using consolidation centres to assist operations.
193. Within the site, it is confirmed that wheel washing facilities will be provided and that staff parking will not be provided, with staff encouraged to use public transport instead.
194. The outline CLP is a good base from which to develop a final CLP once a principal contractor has been appointed.

Lighting

195. A lighting report has been provided with the submission. This confirms that Cambridge Road will be designed to lighting class P3 (average illuminance 7.5 lux), whilst the footpath fronting the terraced

houses, the new one-way access road and the urban park will be illuminated to lighting class P4 (average illuminance 5 lux). These lighting levels are considered appropriate and for the roads will be achieved using 6m high columns supporting LED lanterns.

Green Infrastructure

Urban Greening and Landscaping

196. London Plan policy G5 states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls, and nature-based sustainable drainage. Predominantly residential developments should achieve an Urban Greening Factor (UGF) score of 0.4. In addition, Policy G4 of London Plan sets out that development proposals should not result in the loss of protected open space.

197. The proposals are accompanied by Landscaping Report. The proposed development presents a well-considered approach regarding the surrounding areas of local green space. In justifying the loss of Old Granville Open Space, the applicant has demonstrated consideration of access to public open space across the site including an urban park and play area. The site's proposed green infrastructure also includes areas of woodland, semi natural vegetation, intensive green roofs, SuDs including rain gardens and ground cover planting. In total, the area of soft landscaping measures 2,290 sqm. This is made up from: the large internal courtyard between Blocks A, B and C, the new park and playspace, rain gardens along Carlton Vale and in front of Block D, tree planting on Granville Road, front and rear gardens to Block D and roof space.

198. The UGF for the scheme is calculated as 0.33. The applicant has outlined that this is due to changes to the development in order to incorporate fire regulations. This includes an increase in bulk and massing to the buildings, additional paths to facilitate evacuation strategies. Brent Officers and the GLA have advised that further consideration to the proposed landscaping should be taken in order to increase the applications UGF. Features for consideration should include the quality of the green roof and further planting at ground level. Brent's Landscape Officer has also advised that the proposed trees in sett paving are unlikely to grow well and can cause root damage. As such, the areas surrounding the proposed trees should be set in landscaping rather than hardstanding which will further aid surface water run off. Significant detail for furniture and surfacing have been submitted with the proposal. These show a good indication of the proposed quality of the provision of outdoor areas, however final details will be requested through condition.

199. Therefore, while the loss of the existing Open Space has been justified as it has been sufficiently replaced elsewhere within the wider application site, a condition is recommended to secure final detailed landscape drawings, which will include full details of type and species of tree and plant planting throughout the site. Consultation will be also required with Transportation to confirm areas for extent of the adopted highway and the suitability of landscaping adjacent to adopted highway.

Biodiversity and Ecology

200. London Plan policy G6 highlights the need for Sites of Importance for Nature Conservation (SINCs) to be protected. Policy G6 also outlines that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. Brent Local Plan Policy BGI1 sets out the need for all developments to achieve a net gain in biodiversity and avoid any detrimental impact on the geodiversity of an area.

201. The application site does not lie within a Site of Importance for Nature Conservation (SINC), and does not form part of any designations of national or international importance, including any Sites of Special Scientific Interest (SSSI). The scheme does however include the loss of Old Granville Open Space. This area to the west of the site is a defined open space which was provided as part of the planning consent for Granville New Homes. The Open Space includes mature canopy trees, a community garden and existing biodiversity. The community garden was established on a short-term to medium-term agreement prior to a development coming forward on this site with the South Kilburn

Regeneration Team. The garden is constructed from portable structures and is likely to be relocated elsewhere in the masterplan area. The loss, in this location, is not considered harmful to the overall provision of biodiversity on site. The application includes a comprehensive landscape strategy across the site. However, the submitted information does not demonstrate that the proposal will achieve a net gain in biodiversity as required by policy, and therefore further details will be sought by condition.

202. A Preliminary Ecological Appraisal (PEA) was submitted the application along with an Addendum to the original report. The survey found the site to be comprised of five buildings surrounded by hardstanding and small areas of introduced shrub, amenity grassland and scattered trees. There was also a patch of tall ruderal vegetation to the north of the site.
203. The buildings were found to have features to support roosting bats. As such emergence/ re-entry surveys were carried out. These found Hereford House and Exeter Court were to have low bat roosting potential and the site to provide low levels of foraging and commuting habitat for bats. The development would, however, result in minor negative long-term impact to low numbers of foraging and commuting pipistrelle bats without appropriate mitigation. This would be significant at a site level only. The proposed specific mitigation and enhancement measures including planting native species, avoiding scattered trees, bat boxes/tubes, sensitive lighting strategy where possible. However, data from bat surveys should be considered to be valid for a period of 12-18 months. As such new surveys prior to demolition will be requested via condition.
204. With regards to the trees on site, these were found to have negligible roosting potential for bats with no potential roosting features. A variety of bird species were noted on site. All breeding birds and their nests are protected under the Wildlife and Countryside Act 1981. It is recommended that vegetation clearance should be carried out between September and February inclusive, to avoid any potential offences relating to breeding birds during their main bird breeding season. Feral pigeons breed throughout the year, and so due care should be taken to ensure this species is not nesting before clearance works take place at any time of year. In addition, one building had low potential to provide a nesting habitat to support peregrine falcons. A presence/absence survey was conducted and found no nests for any avian species were recorded in the vicinity of the Hereford House and Exeter Court estate complex or within the roof area of Hereford House and no peregrine activity was observed during the survey. The report notes that if works are delayed by more than two years, updated surveys will be required. As such, this will be conditioned.
205. Otherwise, the report recommends that any protected species that are found during site clearance or construction, works must stop immediately and advice sought from a suitably qualified ecologist on how to proceed. The above will be secured by conditions and informative.
206. In terms of ecological enhancements, the report makes recommendations such as: biodiverse/bisolar roofs, native scrub/tree planting, tree retention and adequate replacement, good horticultural practice, bat boxes/tubes, and bird nesting boxes either at roof level on the proposed buildings in close proximity to the biodiverse roofs or position on trees at ground level. A robust landscape strategy will include the requirement for these mitigation measures outlined to be subject as part of the condition.

Trees

207. London Plan policy G7 sets out the need for development proposals to ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.
208. Brent Local Policy BGI2 highlights in the case of major development to make provision for the planting and retention of trees on site. Where retention is agreed to not be possible, developers shall provide new trees to achieve equivalent canopy cover or a financial contribution for off-site tree planting of equivalent canopy cover will be sought. Replacement canopy cover will be measured as total canopy

area of new trees at time of planting being equal to canopy area of existing mature trees proposed for removal.

209. An Arboricultural Impact Assessment has been undertaken, which identified a total of 39 individual trees and 7 groups on and immediately adjacent to the proposed development site. The breakdown of the different categories is as follows:
- Category A: 0 trees
 - Category B: 18 trees
 - Category C: 17 trees
 - Category U: 4 trees.
210. The development proposed the removal of the majority of the existing trees (31 trees). One tree is also recommended for removal on arboricultural grounds. Four trees are proposed for retention, located within the north eastern corner of the site, however there are noted as potential sustaining damage to Root Protection Areas (RPAs) due to installation of hardstanding.
211. The application includes a comprehensive indicative tree planting strategy including:
- Over 100 proposed new trees within the communal courtyard
 - Over 40 proposed new trees within the new Granville Park
 - new street trees within the public realm including along Carlton Vale and Granville Road.
212. The applicant has also provided a Community Asset Valuation for Amenity Trees (CAVAT) Assessment. The result of the CAVAT calculations for the trees identified for removal at Hereford House and Exeter Court is calculated to be £1,311,244.
213. Brent's Tree Officer has assessed the proposal and has advised that there are a number of trees towards the east of the site in the proposed park and play space that should be retained where possible. In addition, effort should be made to slightly relocate the play area outside of Root Protection Areas (RPA) of the trees and to replace hard paving in the square either side of Cambridge Road with soft landscaping or grass where possible.
214. The Horse Chestnut (T12) and Ash (T13) Trees at the north east corner of the site are retained due to existing mature large canopy. While it is regrettable that the Beech (T10) is not shown for retention, the applicant has indicated that the demolition of the existing building in this location is likely to cause significant damage to the RPA. Nevertheless, protection will be sought during the demolition process with the aim of protecting this tree. The change in levels at the centre of the site and the installation of attenuation tanks will result in the loss of the House Chestnut tree (T15) and the Silver Birch tree (T14) within the proposed park.
215. In the case of the three Limes Trees (T7,8 and 9), an Ash (T6) and a Sycamore (T5), shown for removal on Carlton Vale edge of site, along with two maples (T1 and T2) shown for removal on Granville Road edge of site, while it is regrettable that they are to be removed, it is acknowledged that due to the building lines, these cannot be retained. The Landscape Officer has requested that street trees are planted of this value to replace the value of mature trees T1, T2, T5, T6, T7 and T8 . This will be secured within the condition for landscaping.
216. Amendments are also proposed to the tree planting scheme to the east of Cambridge Road, which should be include areas of soft landscape surrounding proposed trees. While a line of trees is proposed to the north side of Granville Road, given that there are existing trees close to this location, the proposed planting should be relocated to the south side. These details will be secured through a condition.
217. Finally, existing Old Granville Open Space includes numerous mature trees and trees to the north of this area growing within the South Kilburn Conservation Area, outside of the site. The Council's Landscape Officer has advised that it is not realistic for trees to be retained within the Old Granville Open Space due to the building footprint and potential impact to resident's amenity areas. The site allocation outlines an inductive capacity of 20 dwellings in this area and therefore the loss of this trees is acceptable

on the basis of good quality replacement planting in front of Block D and sufficient replacement trees across the site. The groups of off-site trees within the Conservation Area (G4, G5 and G6) are not proposed for removal and the preliminary management advice states the timber boundary fence and boundary brick wall will protect RPAs. These should be included within the Tree Protection Plan requested via condition.

218. In light of the above an Arboricultural Method Statement will be sought to include details of the protection of the retained trees along with a landscaping scheme that identifies the provision of new trees.

Energy and Sustainability

219. Planning applications for major development are required to be supported by proposals for sustainable design that accord with various policies in the Brent Local Plan and the London Plan. This is designed to demonstrate, at the design stage, how sustainable design and construction measures would mitigate and adapt to climate change over the lifetime of the development, including limiting water use to 105 litres per day (SI 5) and the use of sustainable drainage (BSUI4).
220. Major residential and non-residential developments are expected to achieve zero carbon standards, including a 35% reduction on Building Regulations 2021 Target Emission Rates (TER) achieved on site, in accordance with London Plan Policy SI2. Policy SI2 also sets out more detailed requirements, including the 'Be Seen' requirement for energy monitoring and reporting and (for proposals referable to the Mayor) a Whole Life Cycle Carbon Assessment). Policy SI4 requires the energy strategy to include measures to reduce the potential for internal overheating and reliance on air conditioning systems.
221. Any shortfall in achieving the target emissions standards is to be compensated for by a financial contribution to the Council's Carbon Offsetting Fund, based on the notional price per tonne of carbon of £95, or through off-site measures to be agreed with the Council.
222. For the residential elements of the development, the policy also requires at least 10 percentage points of the minimum 35 percentage point reduction to be attributable to energy efficiency measures (known as 'be lean' measures) and for the commercial parts of the development, the policy requires at least 15 percentage points of the reduction to be attributable to 'be lean' measures. An Energy Assessment is required, clearly outlining how these standards would be achieved and identifying, where necessary, an appropriate financial contribution to Brent's carbon-offsetting fund to compensate for residual carbon emissions.
223. The Council also adopted the Sustainable Environment and Development SPD that provides guidance on range of sustainable development issues.

Energy

224. The energy assessment submitted sets how the London Plan energy hierarchy has been applied. At the 'be lean' stage of the hierarchy, applicants must achieve carbon emissions savings through passive energy saving measures. For this proposal, the applicants have put in place the following demand reduction measures: enhanced U-values, air tightness improvements, high efficiency lighting, efficient mechanical ventilation with heat recovery and waste water heat recovery.
225. For the 'be clean' stage, the scheme will have a communal low-temperature heating system which will connect to a local planned heat network. The small commercial unit on the ground floor of Block C1 is categorised as shell and core. When built out the heating demand is expected to be met a stand-alone air source heat pump so no CO₂ reductions are identified at this stage of the energy hierarchy.
226. For the 'be green' stage, applicants are required to maximise the use of onsite renewable technologies in further reducing carbon emissions. The applicants propose to install 322 photovoltaic panels with a total system output of 132 kWp.

227. The assessment demonstrates that the scheme would deliver a 68% reduction for the residential element and 19% reduction for the non-residential element below the 2021 Building Regulations baseline, which is broken down into the following elements below:

Table 6: Residential Element

	Regulated emissions CO2 p.a	Saving in regulated emissions CO2 p.a	% reduction
Baseline Building Emissions based on Part L 2021	236	n/a	n/a
Building Emissions following 'Be Lean' measures	202.5	33.5	14%
Building Emissions following 'Be Clean' measures	72.8	129.8	55%
Building Emissions following 'Be Green' measures	74.5	-1.7	-1%
Cumulative on-site savings	-	161.5	68%
Annual savings from off-set payment	-	74.5	-
Cumulative savings for off-set payment (Tonnes CO2)		2235	
Total offset payment (£95 per tonne over 30 years)		£212,279	

Table 7: Non-residential element

	Regulated emissions CO2 p.a	Saving in regulated emissions CO2 p.a	% reduction
Baseline Building Emissions based on Part L 2021	0.6	n/a	n/a
Building Emissions following 'Be Lean' measures	0.5	0.1	19%
Building Emissions following 'Be Clean' measures	0.5	0.0	0%
Building Emissions following 'Be Green' measures	0.5	0.0	0%
Cumulative on-site savings	-	0.1	19%
Annual savings from off-set payment	-	0.5	-
Cumulative savings for off-set payment (Tonnes CO2)		15	
Total offset payment (£95 per tonne over 30 years)		£1438	

228. As the tables above demonstrate, the reduction in carbon emissions delivered by the proposed development significantly exceeds the overall energy performance targets in policy SI2 for both residential and non-residential carbon savings. In respect of the 'Be Lean' savings, the non-residential component of the scheme falls marginally short of the 15% minimum savings sought for this element. However given the overall savings significantly exceed the 35% target, officers consider this limited conflict with policy SI2 to be acceptable on balance.

229. A carbon offsetting payment of £95 per year for 30 years for each tonne of emitted regulated carbon

is to be secured from the developer in line with London Plan policy. A detailed energy strategy would be secured through condition with the need to pay any contribution should the scheme not achieve zero carbon, which at this stage is anticipated to be £213,717.

230. A commitment has been provided that the development will be designed to enable post construction monitoring and that the information set out in the 'be seen' guidance is submitted to the GLA's portal at the appropriate reporting stages. This will be secured through an agreement with the applicant.

231. The GLA have confirmed that the development's energy strategy is in general compliance with the London Plan policies, although to ensure that the projected and (where possible) additional savings are achieved, further information/clarification relating to lighting, the district heat network, Target Emission Rates, carbon dioxide savings and energy use intensity are required. This would be provided ahead of the stage 2 referral.

232. The GLA have also requested a commitment that the development will be designed to enable post construction monitoring and that the information set out in the 'Be Seen' guidance is submitted to the GLA's portal at the appropriate reporting stages is to be secured via an agreement, as well as the carbon offset contribution and a condition requiring a connection to the South Kilburn heat network

Whole Life Carbon and Circular Economy

233. A Whole Life Cycle (WLC) Carbon Assessment has been provided, as required by London Plan policy SI2, demonstrating whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrating actions taken to reduce life-cycle carbon emissions. By undertaking a WLC, the development has demonstrated (subject to further Stage 2 consideration by the GLA) that options for reducing carbon emissions have been considered and implemented where feasible. The GLA have confirmed that all WLC matters have been satisfactorily addressed. A Circular Economy (CE) statement has been submitted, as required by London Plan policy SI7. While the principles of this are generally supported, there are some details which require review by the GLA as part of the stage 2 referral.

234. Suitable planning conditions, including post completion, relating to the WLC and CE Statement will be incorporated following consideration of GLA feedback at the Stage 2 referral stage.

Overheating

235. London Plan Policy SI4 expects all new proposals to minimise adverse impacts on the urban heat island through design, layout, orientation, materials, and the incorporation of green infrastructure. Major proposals should demonstrate how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:

236. Reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure;

- Minimise internal heat generation through energy efficient design;
 - Manage the heat within the building through exposed internal thermal mass and high ceilings;
 - Provide passive ventilation;
 - Provide mechanical ventilation; and
 - Provide active cooling systems.
- The sustainability statement confirms that overheating risk was considered early in the design process to ensure compliance with relevant standards. Suitable passive measures have been incorporated within the building envelope and services design to mitigate overheating and reduce cooling demand.

237. The proposed approach involves a natural ventilation strategy. Passive measures include internal blinds, self-shading balcony design and considered glazing specification. Mechanical Ventilation with Heat Recovery (MVHR) has also been incorporated, with MVHR has also been incorporated, with summer bypass and variable speed controllers, in order to minimise the need for active cooling.

238. Meeting the notional cooling demand has not been possible. This is due to the passive design measures which have been put in place to achieve energy efficiency targets. The passive design measures reduce the heating demand but also increase the cooling demand of the commercial unit. The applicant has set out that the heating demand is approximately 18% below the notional heating demand whereas the cooling demand is only 3% above the notional cooling demand which results in an energy

saving overall. The GLA have requested clarification over these details. This will be finalised prior to the Stage 2 referral.

Water consumption

239. London Plan Policy SI 5 Water infrastructure and Policy BSUI4 (On Site Water Management and Surface Water Attenuation) requires proposals to minimise the use of mains water achieving water consumption of 105 litres or less per head per day. A condition is attached to this application to ensure the water consumption is within the limits, in line with this policy requirement, and in response to the GLA Stage 1 comments.

Air Quality

240. The site is located within an Air Quality Management Area (AQMA) and an Air Quality Focus and Action Area. In accordance with London Plan Policy SI1 and Local Plan Policy BSUI2, an Air Quality Assessment and Air Quality Positive Assessment should be submitted with the application, as the site is located within a Growth Area. The assessment should consider the potential emissions to the area associated with the development as well as the potential impact on receptors to the development.

241. The submission includes an Air Quality Assessment. The report considers the potential to expose future site users to elevated pollutant concentrations as well as to cause construction and operational phase impacts within the sensitive area.

242. It concludes that during the construction phase, there is potential for air quality impact, however assuming good practice dust control measures are implemented, the dust generation by construction, earthworks and track out activities was not predicted to be significant. It is recommended that conditions are secured within a Construction Management Plan (CMS) to include an Air Quality and Dust Management Plan (AQDMP) and compliance with the London Non-Road Mobile Machinery (NRMM) Low Emission Zone standards.

243. Across the site, dispersion modelling verified that long and short term NO₂ and PM concentrations were below the relevant benchmarks. The site is therefore considered suitable for the proposed end-use without the implementation of protective mitigation techniques to protect future amenity. Natural ventilation and openable windows throughout all residential units is deemed acceptable, and will not influence the heating/cooling strategy.

244. The assessment also included whether there was the potential for vehicle trips generated by the proposed development to affect local air quality. The traffic fate indicative that the anticipated traffic flows are below the relevant thresholds and operational impact could be screen out as not significant.

245. While the assessment does not include information relating to the buildings emissions, this detail is provided within Appendix 9: Air Quality Impacts of the Energy Assessment. This information confirms that the majority of residential energy sources will come from the existing district heat network with capacity expanded by installing air source heat pumps and the remaining coming from grid electricity. For the non-residential energy use, the energy would come from grid electricity.

246. The application has not been accompanied by an Air Quality Positive Assessment. This was raised by the Council's Environmental Health team. Air quality positive brings together a range of evidence in support of a planning application to show how air quality has been considered holistically, including through the consideration of how better design can reduce exposure, building emissions, transport emissions, innovation and futureproofing.

247. The application was submitted prior to the adoption of the Air Quality SPG. However, in terms of an air quality positive approach, reviewing the application against the guidance the proposal includes air quality positive measures. For example, in terms of building emissions, the development receives all energy from Grid electricity and the connection to existing District Heat network along with the provision of air source heat pumps. In addition, the habitable rooms in the scheme benefit from passive ventilation and a building layout which allows for the dispersion of pollutants. In terms of transport emissions, the scheme is car-free with EV charging points providing on street. In addition, the scheme has adopted a

healthy streets approach. Therefore, while an air quality statement has not been submitted, the range of evidence provided by the applicant demonstrated that holistically the scheme has been designed to address Air Quality Positive.

Construction Noise and Nuisance

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

249. 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. This would need to include management of dust through wheel washing and other mitigation measures, such as noise restrictions.

250. 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.

Contaminated Land

251. The site to be redeveloped and the surrounding area has been identified as previously contaminated. The Council's environmental health team has therefore recommended conditions requiring a site investigation and verification reports to be submitted for approval, with remediation and mitigation measures required being fully implemented before the relevant part of the works is carried out. These have been attached to the draft decision notice.

Noise

252. London Plan Policy D13 states that proposals should avoid significant adverse noise impacts on health and quality of life and should, where possible, improve and enhance the acoustic environment and promote appropriate soundscapes. In circumstances where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles. Brent Policy DMP1 also expects new development to ensure that it does not result in an unacceptable increase in exposure to noise and general disturbance.

253. A Noise Impact Assessment has been undertaken ascertain the daytime and night-time noise levels likely to be experienced by the proposed development. This includes details of the assessment methodology; the baseline conditions at the site and surroundings and any necessary mitigation measures required to reduce and minimise any adverse effects.

254. The report has identified that the proposed development is bounded by roads and the noise climate is dominated by road traffic noise. Measured noise levels allowed for a robust glazing specification to be proposed which would in turn provide acceptable internal noise levels for all residential environments of the development. Provided these mitigation measures are installed then no further conditions are recommended in terms of design of the buildings to protect proposed habitable spaces.

Fire Safety

255. Policy D12 of the London Plan states that all major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor and requires the statement to demonstrate how consideration has been given to such matters as fire appliance access and features which reduce the risk to life.

256. Further to the above, Policy D5 (B5) of the London Plan seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users, with fire evacuation lifts suitable to be used to evacuate people who require level access from the buildings.

257. A Fire Safety Report and a Fire Safety Form responding to London Plan D12 have been submitted. Key measures which are to be implemented in the blocks include:

258. A conventional stay put evacuation strategy.

- An evacuation alert system for use by fire and rescue services
- All flats will be provided with LD1 Category automatic fire alarm and fire detection system.
- The internal layout of flats will be one storey with internal hallways or open plan layouts.
- All of the buildings will be provided with a ventilated stair lobby in addition to the common corridor which is recommended by current standard guidance.
- The travel distances within the common corridors will be within the recommended maximum limits
- Blocks C1 and C2 (exceeding 18) will provide two stairs and each will be provided two hybrid lifts (facilities to be both evacuation and firefighting lifts)
- Blocks A1, A2, B1 and B2 will each be provided with an evacuation lift designed and installed in accordance with BS 9999
- Residential sprinklers will be provided to all residential flats, townhouses and all internal ancillary areas. The sprinkler system will be designed, installed and tested in accordance with BS 9251 and will include enhancements for reliability in Blocks C1 and C2.
- An external fire spread assessment for the worst case residential flats has been set out.
- All materials which become part of an external wall or specified attachment will achieve Class A2-s1, d0 or A1 in accordance with BS EN 13501-1.
- Blocks C1 and C2 will be designed with firefighting shafts.
- External hydrants will be located within 90m of all fire main inlets and entrances to townhouses.

259. The submitted Fire Statement and fire safety design are suitable to meet the requirements of D12. The GLA have assessed the strategy and have recommended that the statement is altered to reflect the minor alterations submitted in June 2024 to the ground floor internal arrangement of Block C to provide an additional window to the commercial space and a window into the social rent lobby of C2. These design changes had no impact on the fire strategy given the minor alteration. A condition is requested requiring the installation of fire evacuation lifts and a condition requiring compliance with the recommendations of the approved fire strategy, and any subsequent updated versions.

Flooding

260. Paragraph 167 of the NPPF sets out that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;
- b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;
- c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
- d) any residual risk can be safely managed; and
- e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

261. The above position is reinforced within policy BSUI3 of Brent's Local Plan which highlights that proposals that require a Flood Risk Assessment must demonstrate that the development will be resistant and resilient to all relevant sources of flooding including surface water. Proposed development must pass the sequential and exceptions test as required by national policy. The design and layout of proposals requiring a Flood Risk Assessment must contribute to flood risk management and reduction and:

- a) minimise the risk of flooding on site and not increase the risk of flooding elsewhere;
- b) wherever possible, reduce flood risk overall;
- c) ensure a dry means of escape;
- d) achieve appropriate finished floor levels which should be at least 300 mm above the modelled 1 in 100 year plus climate change flood level; and
- e) not create new basement dwellings in areas of high flood risk.

262. The policy goes onto say that proposals that would fail to make appropriate provision for flood risk mitigation, or which would increase the risk or consequences of flooding, will be refused.

263. A Flood Risk Assessment (FRA) has been submitted in support of the application. This report confirms that the site lies within Flood Zone 1 in terms of fluvial or tidal flooding. However, the report demonstrates some localised pockets of surface water flooding, and the West London Strategic Flood Risk Assessment confirms that large parts of the site are within Flood Zone 3a for surface water flooding.

264. Only certain types of development are acceptable, as set out within the Flood Risk Vulnerability Classification table set out within the NPPF. Residential uses are classed as 'More Vulnerable' whereby such uses would not be supported in Flood Zone 3a where the sequential and exception test has not been met. The commercial uses are classed as 'Less Vulnerable' and are considered acceptable subject to appropriate mitigation measures, set out in the Environment Agency's standing advice.

265. In this case, the site does form part of a site allocation within the Local Plan. As part of the evidence base to support the Local Plan, the site was included as part of the Brent Flood Risk Sequential and Exception Test documentation. The document sets out that the Sequential Test had been passed, however a site specific FRA would need to demonstrate this with reference to the Level 2 SFRA.

266. The FRA demonstrates that the site has a low risk of flooding from fluvial, groundwater, reservoir and sewer sources. The report also classifies the pluvial risk as low subject to proposed mitigation. The report sets out that in order to mitigate any potential surface water flooding, the site levels should be designed in such a way as to ensure any overland flow is routed through the network of roads and public open space on site, directed away from buildings. The proposed landscape, levels and drainage strategies are proposed to direct surface water runoff away from buildings and towards SuDS features throughout the site including rain gardens, tree pits, soft landscape and permeable pavements. Rainwater falling on the development is captured within the proposed drainage system and also where rainfall is landing on refurbished public highway this will runoff to the existing highway drainage system.

267. The GLA have requested further work regarding how the risk of ponding on site would be mitigated through the proposed layout. This additional work will be undertaken and would be addressed ahead of the Stage 2 referral. The FRA adequately assesses the risk of flooding from fluvial/tidal, groundwater, and reservoir flooding, which is considered to be low. On this basis, officers consider that the exception test has been adequately passed and the proposed development meets the requirements of paragraph 167 of the NPPF outlined above.

Drainage

268. Policy SI13 of London Plan sets out that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the drainage hierarchy.

269. Brent Local Plan Policy BSUI4 relates to on site water management and surface water attenuation. It requires major developments to:

- a) use appropriate sustainable drainage measures to control the rate and volume of surface water run-off;
- b) ensure where feasible separation of surface and foul water systems;
- c) make reasonable provision for the safe storage and passage of flood water in excessive events;

and

d) demonstrate adequate arrangements for the management and maintenance of the measures used.

270. The FRA has been accompanied by a drainage strategy. The strategy set considers the following drainage hierarchy:

271. Recycling of attenuated rainwater was not considered feasible use within the buildings because of the additional cost and complexity of the system when compared against the water saving benefits. A duplication of the internal piping system would be required as well as the provision of storage tanks and pumps which increase the operational and capital cost investments against the benefits.

272. In terms of infiltration techniques, surface water runs off from paved surfaces within the site towards landscape planting, rain gardens, tree pits and permeable pavements. In day-to-day rainfall, the absorption, evaporation and infiltration of surface water through the SuDS features will fully drain paved areas within the site. However, owing to the typically poor permeability of the site's geology (made ground on London Clay), the infiltration rate of the ground beneath the SuDS features would not be sufficient to drain the site in severe storm events. Gullies and slot drains are therefore also utilized to supplement the SuDS features. The attenuation of rainwater in ponds or open water features was not considered to be feasible for the development. Surface water overflows from SuDS features will drain into the below ground drainage system and attenuated in tanks for gradual release to the sewer system. There are no watercourses suitably located within vicinity of the site to receive run off. The local sewer network is combined. It is proposed that surface water is continued to discharge to the existing combined water network in the vicinity of the site.

273. In addition, the development notes that the surface water discharge is reduced to the greenfield runoff rate. The pre-development peak rate of run off was calculated at 23.0 l/s. The post-development peak rate of run off has been calculated to 9.7l/s while the greenfield run off rate is calculate as 10.1 l/s. Attenuation tanks will be provided to accommodate surface water that backs up behind the flow control device in severe storm events, supplementing the SuDS features proposed within the landscape. These tanks are sited below the proposed Open Space.

274. The strategy sets out that communal infrastructure of the whole development is to be managed and maintained by the building's owner. It is considered that the sustainable drainage measures are acceptable and in accordance with policy BSUI4. Such details are recommended to be conditioned to any forthcoming consent.

275. The GLA are disappointed that rainwater harvesting has not been included within the scheme and have requested more information with regards to the greenfield run off rate, green roof extents and hydraulic calculations. This would be addressed ahead of stage 2 referral.

276. Thames Water were consulted during the course of the application and confirmed that they would have no objections in relation to surface water or foul water drainage capacity based on the information provided. They have recommended a condition in relation to piling as the development is located within 15 m of a strategic sewer and an informative relating to anticipated flow rates.

Wind Microclimate

277. A wind microclimate assessment has been submitted with the application, using the Lawson Comfort criteria as the main basis for assessment, which is recognised as best practice for this type of benchmarking.

278. The assessment uses meteorological data to determine the existing wind microclimate and wind conditions around the proposed development. Places tested included all pedestrian thoroughfares, building entrances and amenity areas. The report displays the expected wind conditions for ground level during the windiest and summer season and at elevated levels during the summer season. Due to the location of the Proposed Development, generally surrounded by low-rise buildings, the majority of the Site would be suitable for standing during the windiest season with localised areas of strolling conditions along

the western facades of Blocks A and B, the south-eastern corner of Block C, the channel between Blocks A and C, and within the central courtyard.

279. Areas within amenity spaces on ground level are one category windier than desired. To mitigate this, the report recommends that the landscaping scheme as shown in the plans is implemented with trees at minimum height of 3m. Relevant conditions will be secured to ensure the implementation of the scheme.
280. Entrances along the western façade of Blocks A and B are unsuitable for their intended usage, requiring mitigation. To improve conditions, side screens either side of the entrance should be implemented. This can be in the form of solid or porous screens (at least 50% solid area) measuring at least 2m in height and 1m in width. A condition requiring the submission of this screening detail will be included.
281. Standing use wind conditions during summer season on multiple balconies and western roof terrace of Block D would potentially be tolerated by occupants on the basis that these are private spaces that are usable as weather permits. The report recommend mitigation for these areas if feasible in order to improve the conditions further.
282. Strong winds exceeding 15m/s are not expected to occur for more than 2.2 hours per year in or around the proposed development.
283. Overall, wind conditions around the site are expected to be suitable for their intended use, with only localised areas of windier than desired conditions. Mitigation measures are expected to reduce wind speeds in the highlighted areas above thereby providing suitable wind conditions in and around the site.

Employment, Apprenticeship and Training

284. Brent Local Plan Policy BE1 sets out an Employment, Apprenticeship and Training Plan will be required for all developments of 5,000sq.m or more or sites capable of providing 50 or more residential units, to be prepared in partnership with Brent Works or any successor body. The applicant has anticipated a contribution in relation to Employment and Training. This will be secured through a condition.

Utilities

285. The applicants have submitted an overview setting out the existing and required utilities / statutory services for the scheme, including clean water supply, sewer connection, gas, electricity and internet connection. The report sets out that discussions with providers are on going. The statutory services report indicates that fibre internet is proposed to be made available to all apartments, which would accord with the aims of London Plan policy SI6. A condition is attached ensuring that high-speed broadband is secured for all future dwellings, in line with this policy.

Equalities

286. In line with the Public Sector Equality Duty, the Council must have due regard to the need to eliminate discrimination and advance equality of opportunity, as set out in section 149 of the Equality Act 2010. In making this recommendation, regard has also 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).
287. An Equality Impact Assessment was submitted in support of the proposal. The assessment is split into the following sections:
- Brief overview of the site and proposed development.
 - Outline of the national, regional and local policy context with regard to specific legislation and policies that seek to reduce inequalities.
 - Outline of the proposed assessment methodology.
 - Existing socio-economic baseline (at London, Borough and Ward or LSOA level. Where

possible LSOA data will be utilised to present a more accurate picture of the local population).

- Impact Assessment table comparing the possible impacts of the development against the existing baseline including recommendations for mitigation where necessary.
- Draws a conclusion of the overall impacts of the development on protected groups.

288. The report identifies potential impacts, both adverse and beneficial, including:

- The loss of existing employment space and potential jobs and the creation of employment opportunities in the non-residential floor space.
- The impact of air quality, noise and transport on local population with long-term health problems and/or older people
- Local employment during construction
- Temporary loss of open space
- Provision of new and replacement social housing
- Provision of a new public park including new play space
- Improved pedestrian and cycle access
- Provision of Blue Badge parking
- Provision of accessible homes

289. The assessment concludes that significant adverse equalities impacts will arise as a result of the development and the development will deliver several beneficial impacts.

CONCLUSION:

290. The proposals would result in a mixed use, predominantly residential development on an existing housing estate which is allocated within the Local Plan and would accord with key policy objectives of the site allocation including, provision of new open space and mixed tenure housing. The scheme includes a public open space of 2,400 sqm and 250 new homes including 51% affordable housing when measured by habitable room. The scheme demonstrates general compliance with the South Kilburn SPD.

291. The new homes would include 109 affordable homes (14,139 sqm floorspace), all provided at social rent with 37.6% of these being 3 bed units. A Financial Viability assessment was submitted to support the application which found the scheme to be in a deficit. This was evaluated by consultants commissioned by the Council who concluded that the level of deficit is lower than that set out by the applicant, but nevertheless, it is significantly in deficit. Officers consider that the amount of Affordable Housing proposed is the maximum amount that the scheme could viably deliver. Early and late stage review mechanisms are recommended to ensure that any uplift in viability is captured.

292. In terms of housing size mix, the overall proportion of family homes is 21.2% which falls slightly short of the council policy target with the applicant citing the reduction due to internal fire safety requirements and a recent update to the Housing Needs Assessment for the South Kilburn area indicating a reduced need for 2 and 3 bedroom social rented units. In addition, any changes to the private mix to increase the number of three bedroom homes would be likely to adversely affect the viability of the scheme, resulting in a greater deficit and lessen the quantum of affordable housing. The proportion of family sized affordable homes is above targets. In this instance, Officers consider that this justification is suitable and the benefits of providing more affordable homes and afford family sized homes above the private family sized homes in the scheme is accepted.

293. The proposal will result in the provision of a high quality public realm, with routes and spaces proposed at ground level which are publicly accessible. These include routes through the site together with a new urban park and a play spaces, and are considered to represent a significant benefit of the scheme. The architectural quality of the buildings is considered to be high, and the approach to building height, massing and composition is well considered. Although the maximum height is one storey above the ambitions of the South Kilburn SPD. The site is within the tall building zone and sits below the height of the existing Hereford House. It has also been successfully demonstrated that the design approach is suitable and meets the key criteria of London Plan policy D9.

294. The quality of the homes is considered to be good, with homes meeting internal space standards and other quality factors considered and discussed in this report. Officers acknowledge that the proposal will result in some daylight and sunlight impacts to neighbouring properties, some of which will go beyond targets within BRE guidance. However, the level of impact is not considered to be excessive given the policy allocation and designations, and the benefits of the scheme are considered to outweigh the harm.
295. Following the above discussion, officers consider that taking the development plan as a whole, the proposal is considered to accord with the development plan, and having regard to all material planning considerations, should be approved subject to conditions and necessary legal agreements.



DECISION NOTICE – APPROVAL

Application No: 21/2587

To: Elizabeth Bundred Woodward
Tibbalds Planning and Urban Design Ltd
19 Maltings Place
169 Tower Bridge Road
London
SE1 3JB

I refer to your application dated **05/07/2021** proposing the following:

Full planning application for the demolition of the existing Hereford House and Exeter Court buildings and the construction of four new residential buildings ranging from 3-13 storeys, the provision of flexible non-residential floorspace at ground floor of Block C1, a new public urban park and new access road along the western side of the site, cycle and blue badge car parking and associated infrastructure

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

at **Hereford House and garages, Carlton Vale & Exeter Court, Cambridge Road & Open Space and Play Area, Granville Road, London, NW6**

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: 30/07/2024

Signature:

David Glover
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.

SUMMARY OF REASONS FOR APPROVAL

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

National Planning Policy Framework 2023
The London Plan 2021
Brent Local Plan 2019-2041

- 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):

Drawings:

371-KCA-XX-XX-DR-A-0001-P 2 Site Location Plan
371-KCA-XX-XX-DR-A-0002-P 2 Existing Site Plan
371-KCA-XX-XX-DR-A-0003-P 2 Proposed Site Plan
371-KCA-AX-00-DR-A-1100-P 3 Proposed Ground Floor Plan – Block A
371-KCA-AX-01-DR-A-1101-P 3 Proposed First Floor Plan – Block A
371-KCA-AX-02-DR-A-1102-P 3 Proposed Second Floor Plan – Block A
371-KCA-AX-03-DR-A-1103-P 3 Proposed Third Floor Plan – Block A
371-KCA-AX-04-DR-A-1104-P 3 Proposed Fourth Floor Plan – Block A
371-KCA-AX-05-DR-A-1105-P 3 Proposed Fifth Floor Plan – Block A
371-KCA-AX-06-DR-A-1106-P 3 Proposed Roof Plan – Block A
371-KCA-AX-XX-DR-A-4000-P 1 Strip Sections & Elevation – Block A Street
371-KCA-AX-XX-DR-A-4001-P 1 Strip Sections & Elevation – Block A Courtyard
371-KCA-AX-XX-DR-A-4002-P 1 Strip Section & Elevation – Block A Gable
371-KCA-AX-XX-DR-A-4100-P 1 Paired Residential Entrance – Block A
371-KCA-BX-00-DR-A-1100-P 3 Proposed Ground Floor Plan – Block B
371-KCA-BX-01-DR-A-1101-P 3 Proposed First Floor Plan – Block B
371-KCA-BX-02-DR-A-1102-P 3 Proposed Second Floor Plan – Block B
371-KCA-BX-03-DR-A-1103-P 3 Proposed Third Floor Plan – Block B
371-KCA-BX-04-DR-A-1104-P 3 Proposed Fourth Floor Plan – Block B
371-KCA-BX-05-DR-A-1105-P 3 Proposed Fifth Floor Plan – Block B
371-KCA-BX-06-DR-A-1106-P 3 Proposed Roof Plan – Block B
371-KCA-BX-XX-DR-A-4000-P 1 Strip Sections & Elevation – Block B Street
371-KCA-BX-XX-DR-A-4001-P 1 Strip Sections & Elevation – Block B Courtyard
371-KCA-BX-XX-DR-A-4002-P 1 Strip Sections & Elevation – Block B Gable
371-KCA-BX-XX-DR-A-4100-P 1 Paired Residential Entrance – Block B
371-KCA-CX-00-DR-A-1100-P 5 Proposed Ground Floor Plan – Block C
371-KCA-CX-01-DR-A-1101-P 3 Proposed First Floor Plan – Block C
371-KCA-CX-02-DR-A-1102-P 3 Proposed Second Floor Plan – Block C
371-KCA-CX-03-DR-A-1103-P 3 Proposed Third Floor Plan – Block C
371-KCA-CX-04-DR-A-1104-P 3 Proposed Fourth Floor Plan – Block C
371-KCA-CX-05-DR-A-1105-P 3 Proposed Fifth Floor Plan – Block C
371-KCA-CX-06-DR-A-1106-P 3 Proposed Sixth Floor Plan – Block C
371-KCA-CX-07-DR-A-1107-P 3 Proposed Seventh Floor Plan – Block C
371-KCA-CX-08-DR-A-1108-P 3 Proposed Eighth Floor Plan – Block C

371-KCA-CX-09-DR-A-1109-P 3 Proposed Ninth Floor Plan – Block C
371-KCA-CX-10-DR-A-1110-P 3 Proposed Tenth Floor Plan – Block C
371-KCA-CX-11-DR-A-1111-P 3 Proposed Eleventh Floor Plan – Block C
371-KCA-CX-12-DR-A-1112-P 3 Proposed Twelfth Floor Plan – Block C
371-KCA-CX-13-DR-A-1113-P 3 Proposed Roof Plan – Block C
371-KCA-CX-B1-DR-A-1099-P 4 Proposed Basement Floor Plan – Block C
371-KCA-CX-XX-DR-A-4000-P 1 Strip Sections & Elevation - Block C1 Street
371-KCA-CX-XX-DR-A-4001-P 2 Strip Sections & Elevation - Block C2 Street
371-KCA-CX-XX-DR-A-4100-P 1 Paired Residential Entrance – Block C
371-KCA-DX-00-DR-A-1100-P 3 Proposed Ground Floor Plan – Block D
371-KCA-DX-01-DR-A-1101-P 3 Proposed First Floor Plan – Block D
371-KCA-DX-02-DR-A-1102-P 3 Proposed Second Floor Plan – Block D
371-KCA-DX-03-DR-A-1103-P 3 Proposed Third Floor Plan – Block D
371-KCA-DX-04-DR-A-1104-P 3 Proposed Roof Plan – Block D
371-KCA-DX-XX-DR-A-4000-P 1 Strip Section & Elevation – Block D Street
371-KCA-DX-XX-DR-A-4001-P 1 Strip Section & Elevation – Block D Rear
371-KCA-DX-XX-DR-A-4100-P 1 Typed Paired Entrance – Block D
371-KCA-XX-00-DR-A-1000-P 5 Proposed Ground Floor Plan – Blocks A,B,C & D
371-KCA-XX-01-DR-A-1001-P 3 Proposed First Floor Plan – Blocks A,B,C & D
371-KCA-XX-02-DR-A-1002-P 3 Proposed Second Floor Plan – Blocks A,B,C & D
371-KCA-XX-03-DR-A-1003-P 3 Proposed Third Floor Plan – Blocks A,B,C & D
371-KCA-XX-04-DR-A-1004-P 3 Proposed Fourth Floor Plan – Blocks A,B,C & D
371-KCA-XX-05-DR-A-1005-P 3 Proposed Fifth Floor Plan – Blocks A,B,C & D
371-KCA-XX-06-DR-A-1006-P 3 Proposed Sixth Floor Plan – Blocks A,B,C & D
371-KCA-XX-07-DR-A-1007-P 3 Proposed Seventh Floor Plan – Blocks A,B,C & D
371-KCA-XX-08-DR-A-1008-P 3 Proposed Eighth Floor Plan – Blocks A,B,C & D
371-KCA-XX-09-DR-A-1009-P 3 Proposed Ninth Floor Plan – Blocks A,B,C & D
371-KCA-XX-10-DR-A-1010-P 3 Proposed Tenth Floor Plan – Blocks A,B,C & D
371-KCA-XX-11-DR-A-1011-P 3 Proposed Eleventh Floor Plan – Blocks A,B,C & D
371-KCA-XX-12-DR-A-1012-P 3 Proposed Twelfth Floor Plan – Blocks A,B,C & D
371-KCA-XX-13-DR-A-1013-P 3 Proposed Roof Plan – Blocks A,B,C & D
371-KCA-XX-B1-DR-A-0999-P 4 Proposed Basement Floor Plan – Blocks A,B,C & D
371-KCA-XX-XX-DR-A-2010-P 2 Existing Section AA – Hereford House & Exeter Court
371-KCA-XX-XX-DR-A-2011-P 2 Existing Sections BB & CC – Hereford House & Exeter Court
371-KCA-XX-XX-DR-A-2012-P 2 Existing Sections DD, EE, FF & GG – Granville Park
371-KCA-XX-XX-DR-A-2100-P 3 Proposed North & South Sections – Blocks A,B & C
371-KCA-XX-XX-DR-A-2101-P 3 Proposed East & West Sections – Blocks A,B & C
371-KCA-XX-XX-DR-A-2102-P 2 Proposed West Sections – Blocks A & B
371-KCA-XX-XX-DR-A-2103-P 2 Proposed North, South, East & West Sections – Block D
371-KCA-XX-XX-DR-A-3000-P 2 Existing Site Elevations
371-KCA-XX-XX-DR-A-3001-P 3 Proposed Site Elevations
371-KCA-XX-XX-DR-A-3010-P 2 Existing Elevation – Cambridge Road Looking West
371-KCA-XX-XX-DR-A-3011-P 2 Existing Elevation – Carlton Vale Looking South
371-KCA-XX-XX-DR-A-3012-P 2 Existing Elevation – Granville Road Looking North & Iranian School Looking West
371-KCA-XX-XX-DR-A-3013-P 2 Existing Elevation – Granville Road Looking South
371-KCA-XX-XX-DR-A-3014-P 2 Existing Elevation – Hereford House Looking West & Hereford House Looking East
371-KCA-XX-XX-DR-A-3015-P 2 Existing Elevation – Carlton Vale Looking North
371-KCA-XX-XX-DR-A-3016-P 2 Existing Elevation – Granville Park Looking North
371-KCA-XX-XX-DR-A-3100-P 2 Proposed North & South Street Elevations - Block A,B & C
371-KCA-XX-XX-DR-A-3101-P 3 Proposed East & West Street Elevations - Block A,B & C
371-KCA-XX-XX-DR-A-3102-P 3 Proposed North & South Courtyard Elevations - Block A,B & C
371-KCA-XX-XX-DR-A-3103-P 3 Proposed East & West Courtyard Elevations - Block A,B & C
371-KCA-XX-XX-DR-A-3104-P 2 Proposed North & South Street Elevations - Block D
371-KCA-AX-XX-DR-A-4200-P 0 Typical Parapet Detail - Block A
371-KCA-AX-XX-DR-A-4201-P 0 Typical Window Detail - Blocks A & B
371-KCA-BX-XX-DR-A-4200-P 0 Typical Parapet Detail - Block B Street

371-KCA-BX-XX-DR-A-4201-P 0 Typical Recessed Balcony Detail - Block B
371-KCA-CX-XX-DR-A-4200-P 0 Typical Parapet & Balcony Detail - Block C
371-KCA-CX-XX-DR-A-4201-P 0 Typical Window Detail - Block C
371-KCA-CX-XX-DR-A-4202-P 0 External Entrance - Block C Commercial
371-KCA-DX-XX-DR-A-4201-P 0 Typical Window Detail – Block D
371-KCA-XX-XX-DR-A-4300-P 0 Medium Pressure Gas Meter Plan & Elevations
371-KCA-XX-XX-DR-A-1300-P2 Unit Type Plans - 1B2P-AX-01
371-KCA-XX-XX-DR-A-1301-P2 Unit Type Plans - 1B2P-BX-01
371-KCA-XX-XX-DR-A-1302-P2 Unit Type Plans - 1B2P-CX-01 & 1B2P-CX-02
371-KCA-XX-XX-DR-A-1303 P2 Unit Type Plans - 1B2P-CX-03 & 1B2P-CX-04
371-KCA-XX-XX-DR-A-1304 P2 Unit Type Plans - 1B2P-CX-05 & 1B2P-CX-06
371-KCA-XX-XX-DR-A-1305 P2 Unit Type Plans - 1B2P-XX-01
371-KCA-XX-XX-DR-A-1306 P2 Unit Type Plans - 2B4P-AX-01 & 2B4P-AX-02
371-KCA-XX-XX-DR-A-1307 P2 Unit Type Plans - 2B4P-AX-03 & 2B4P-AX-04
371-KCA-XX-XX-DR-A-1308 P2 Unit Type Plans - 2B4P-BX-01 & 2B3P-BX-01
371-KCA-XX-XX-DR-A-1309 P2 Unit Type Plans - 2B4P-BX-02
371-KCA-XX-XX-DR-A-1310 P2 Unit Type Plans - 2B4P-C1-01 & 2B3P-C1-01
371-KCA-XX-XX-DR-A-1311 P2 Unit Type Plans - 2B4P-C1-02
371-KCA-XX-XX-DR-A-1312 P2 Unit Type Plans - 2B4P-C1-03 & 2B3P-C1-02
371-KCA-XX-XX-DR-A-1313 P2 Unit Type Plans - 2B4P-C1-04
371-KCA-XX-XX-DR-A-1314 P2 Unit Type Plans - 2B4P-C2-01 & 2B3P-C2-01
371-KCA-XX-XX-DR-A-1315 P2 Unit Type Plans - 2B4P-C2-02 & 2B3P-C2-02
371-KCA-XX-XX-DR-A-1316 P2 Unit Type Plans - 2B4P-C2-03 & 2B4P-C2-04
371-KCA-XX-XX-DR-A-1317 P2 Unit Type Plans - 2B4P-CX-01 & 2B4P-CX-02
371-KCA-XX-XX-DR-A-1318 P2 Unit Type Plans - 2B4P-XX-01
371-KCA-XX-XX-DR-A-1319 P2 Unit Type Plans - 3B5P-AX-01 & 3B5P-AX-02
371-KCA-XX-XX-DR-A-1320 P2 Unit Type Plans - 3B5P-AX-03 & 3B5P-AX-04
371-KCA-XX-XX-DR-A-1321 P2 Unit Type Plans - 3B5P-BX-01 & 3B5P-BX-02
371-KCA-XX-XX-DR-A-1322 P2 Unit Type Plans - 3B5P-C2-01 & 3B5P-C2-02
371-KCA-XX-XX-DR-A-1323 P2 Unit Type Plans - 3B6P-AX-01 & 3B5P-AX-05
371-KCA-XX-XX-DR-A-1324 P2 Unit Type Plans - 3B6P-AX-02 & 3B5P-AX-06
371-KCA-XX-XX-DR-A-1325 P2 Unit Type Plans - 3B6P-AX-03 & 3B6P-AX-04
371-KCA-XX-XX-DR-A-1326 P2 Unit Type Plans - 4B6P-DX-01
371-KCA-XX-XX-DR-A-1327 P2 Unit Type Plans - 4B7P-AX-01
371-KCA-XX-XX-DR-A-1328 P2 Unit Type Plans - 5B7P-DX-01
0042_PR_ZZ_GF_DR_L_6000 P00 Paving Details Sheet 01
0042_PR_ZZ_GF_DR_L_6001 P00 Paving Details Sheet 02
0042_PR_ZZ_GF_DR_L_6010 P00 Kerb & Edging Details Sheet 01
0042_PR_ZZ_GF_DR_L_6011 P00 Kerb & Edging Details Sheet 02
0042_PR_ZZ_GF_DR_L_6020 P00 Wall & Fence Details
0042_PR_ZZ_GF_DR_L_6040 P00 Lighting Details 01
0042_PR_ZZ_GF_DR_L_6041 P00 Lighting Details 02
0042_PR_ZZ_GF_DR_L_6050 P00 Tree House Details
0042_PR_ZZ_GF_DR_L_6055 P00 Community House Details
0042_PR_ZZ_GF_DR_L_6056 P00 Pizza Oven Details
0042_PR_ZZ_GF_DR_L_6060 P00 Bridge Details
0042_PR_ZZ_GF_DR_L_6065 P00 Play Equipment Details 01
0042_PR_ZZ_GF_DR_L_6066 P00 Play Equipment Details 02
0042_PR_ZZ_GF_DR_L_6070 P00 Sand Pit Details
0042_PR_ZZ_GF_DR_L_6075 P00 Puddle Details
0042_PR_ZZ_GF_DR_L_6080 P00 Rocky Outcrop Detail
0042_PR_ZZ_GF_DR_L_6090 P00 Utilities Details
0042_PR_ZZ_GF_DR_L_6100 P00 Planting Details
0042_PR_ZZ_GF_DR_L_6110 P00 Tree Planting Details 01
0042_PR_ZZ_GF_DR_L_6111 P00 Tree Planting Details 02
0042_PR_01_GF_DR_L_1010 P01 Hardscape & Furniture Plan 01
0042_PR_02_GF_DR_L_1011 P01 Hardscape & Furniture Plan 02
0042_PR_01_GF_DR_L_1020 P01 Planting Plan 01

0042_PR_02_GF_DR_L_1021 P01 Planting Plan 02
0042_PR_ZZ_GF_DR_L_0000 P01 Landscape Masterplan
0042_PR_ZZ_GF_DR_L_0001 P01 Illustrative Masterplan
0042_PR_ZZ_GF_DR_L_0002 P01 Utilities Co-ordination Plan
0042_PR_ZZ_GF_DR_L_0003 P01 Soft Landscape Masterplan
0042_PR_ZZ_GF_DR_L_0004 P00 Tree Removal Plan
0042_PR_ZZ_ZZ_DR_L_2000 P00 Section A-A
0042_PR_ZZ_ZZ_DR_L_2300 P00 Sections B-B & C-C
0056_PR_ZZ_GF_DR_L_0004 P00 Utilities Co-ordination Plan
0056_PR_ZZ_ZZ_SH_L_9050 P00 Soft Landscape Planting Schedule
371-KCA-XX-XX-DR-A-8000-P 3 Proposed Unit Key
371-KCA-XX-XX-DR-A-8001-P 3 Proposed NIA Key
371-KCA-XX-XX-DR-A-8002-P 3 Proposed GEA Key
371-KCA-XX-XX-DR-A-8003-P 4 Proposed GIA Key
371-KCA-XX-XX-DR-A-8004-P 3 Proposed Wheelchair Units Key
371-KCA-XX-XX-DR-A-8005-P 4 Proposed Tenure Key

Documents:

Transport Assessment Version: 0.6 prepared by Velocity Transport Planning Ltd dated January 2024

Preliminary Ecological Appraisal prepared The Ecology Consultancy dated 02/01/2019

Addendum to Preliminary Ecological Appraisal prepared The Ecology Consultancy dated 30/06/2021

Fire Safety Strategy Report 03 prepared by Trigon Fire Safety Engineering dated 19/12/2023
Fire Statement Form

Arboricultural Impact Assessment V1.1 prepared by Arbeco dated 27/05/21

Flood Risk Assessment 03 prepared by Lewis Hubbard Engineering dated 14th May 2021

Landscape Planning Addendum 0042-PR-RP-L-0020 P03 prepared by periscope dated February 2024

Landscape Stage 3 Report 0042-PR-RP-L-0010 P00 prepared by periscope dated May 2021

Stage 3 Lighting Design Calculations 1164-HEX-LA-RP-003 prepared by STUDIO DEKKA dated 5th February 2021.

Stage 3 Lighting Design Statement 1164-HEX-LA-RP-002 prepared by STUDIO DEKKA dated 5th February 2021.

Noise Impact Assessment Report 17334.NIA.01 Rev B prepared KP Acoustics dated 11/05/2021

Pedestrian Level Wind Desk-Based Assessment RWDI #1804595 REV E prepared by RWDI dated May 17th 2021

Wind Microclimate Statement of Conformity prepared by RWDI dated 9th October 2023

Schedule of Lighting Equipment 1164-HEX-LA-SH-001 prepared by STUDIO DEKKA dated 5th February 2021.

Tree Schedule 0042-PR-ZZ-ZZ-SH-L-9050 P00 prepared by periscope dated 13/05/2021

Utilities and Foul Water Drainage 03 prepared by Lewis Hubbard Engineering dated 23rd June 2021

Ventilation Statement prepared by Max Fordham dated 4 February 2021

Waste Management Strategy V1.0 prepared by Velocity Transport Planning dated May 2021

Energy Assessment 02 prepared by Max Fordham dated 09 February 2024

Operation Waste Management Strategy V1.1 prepared by Velocity Transport Planning dated October 2023

Delivery and Servicing Plan 2360/2001 Doc No D004 prepared Velocity Transport Planning dated January 2004

Residential Travel Plan V0.6 prepared Velocity Transport Planning dated January 2024

Detailed Circular Economy prepared by Max Fordham dated 13 June 2024

Hereford House – Exeter Court and Granville Park – Detailed Circular Economy Statement prepared Max Fordham dated May 2021

Hereford House – Exeter Court and Granville Park WLC Carbon Assessment prepared Max

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

- 3 The development shall provide the 109 social rented units (Class C3), as shown on the consented plans, in the following mix: 37 x 1-bed, 31 x 2-bed, 17 x 3-bed, 16 x 4-bed and 8 x 5 bed.

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

Reason: To ensure an appropriate mix of units having regard to the identified affordable housing needs of the Borough.

- 4 The development shall provide 141 private sale units (Class C3), as shown on the consented plans, in the following mix: 79 x 1-bed, 50 x 2-bed, 12 x 3-bed.

Reason: To ensure an appropriate mix of units having regard to the identified housing needs of the Borough.

- 5 Not less than 10% of residential units shall be constructed to wheelchair accessible requirements (Building Regulations M4(3)) and the remainder shall meet easily accessible/adaptable standards (Building Regulations M4(2)) save for 4 No. Units [C1-01-00-01, C2-01-00-01, C2-01-00-02 and C2-01-00-03] constructed to Building Regulations M4(1).

Reason: To ensure suitable facilities for disabled users and to future proof homes

- 6 The development hereby approved shall contain 135 sqm of commercial floorspace which shall not be used other than for purposes falling within Use Classes E(a)(b)(c)(d)(e)(g) and F2(b), as detailed in the drawings hereby approved, unless other agreed in writing by the Local Planning Authority, (or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification) and the Town and Country Planning (General Permitted Development) Order 2015 (as amended) (or any order revoking and re-enacting that Order with or without modification).

Reason: In the interests of proper planning and to ensure a proposed uses is acceptable for the site and its locality.

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

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

- 8 Except those living in the Approved Parking Homes, occupiers of the residential development, hereby approved, shall not be entitled to a Residents Parking Permit or Visitors Parking Permit to allow the parking of a motor car within the Controlled Parking Zone (CPZ) operating in the locality within which the development is situated unless the occupier is entitled; to be a holder of a Disabled Persons Badge issued pursuant to Section 21 of the Chronically Sick and Disabled Persons Act 1970. For the lifetime of the development written notification of this restriction shall be included in any licence transfer lease or tenancy agreement in respect of the residential

development. For the lifetime of the development a notice, no smaller than 30cm in height and 21cm in width, clearly informing occupants of this restriction shall be displayed within the ground floor communal entrance lobby of each building, in a location and at a height clearly visible to all occupants. On, or after, practical completion but prior to any occupation of the residential development, hereby approved, written notification shall be submitted to the Local Highways Authority confirming the completion of the development and that the above restriction will be imposed on all future occupiers of the residential development.

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

- 9 The external communal courtyard amenity space located at the ground floor between Blocks A, B and C shall be made available and accessible to all residents within the Blocks A, B and C, regardless of the type and affordability of their accommodation, for the lifetime of the development.

Reason: In the interests of proper planning and to ensure an equitable distribution of amenity space, in accordance with Brent Policy BH13.

- 10 The Granville Urban Park open space adjacent to Cambridge Road as indicated on the proposed plans shall be retained as publically open space without restrictions for the lifetime of the development.

Reason: To ensure a suitable retention and reprovision of Public Open Spae.

- 11 No further extensions or buildings shall be constructed within the curtilage of the dwellinghouses in Block D subject of this application, notwithstanding the provisions of Class(es) A, B, D & E of Part 1 Schedule 2 of the Town & Country Planning (General Permitted Development) Order 1995, as amended, (or any order revoking and re-enacting that Order with or without modification) unless a formal planning application is first submitted to and approved by the Local Planning Authority.

Reason: In view of the restricted nature and layout of the site for the proposed development, no further enlargement or increase in living accommodation beyond the limits set by this consent should be allowed without the matter being first considered by the Local Planning Authority and to prevent an over development of the site and undue loss of amenity to adjoining occupiers.

- 12 The development hereby approved 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.

- 13 Notwithstanding the approved plans, the development shall be carried out in full accordance with the submitted flood risk assessment and drainage strategy (Flood Risk Assessment 03 prepared by Lewis Hubbard Engineering dated 14th May 2021) and all mitigation measures outlined in this document.

The mitigation measures set out shall be fully implemented prior to occupation. The measures shall be retained and maintained thereafter throughout the lifetime of the development.

Reasons: To reduce the risk of surface and water flooding to the proposed development and future occupants and to prevent flooding elsewhere.

- 14 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 Policies BSUI1, BSUI2 and London Plan Policy SI1.

- 15 The development shall include the provision of fire evacuation lifts to Blocks A, B and C as indicated in the submitted plans.

Reasons: In the interests of proper fire safety.

- 16 The development shall be carried out in full accordance with the Fire Safety Strategy Report 03 prepared by Trigon Fire Safety Engineering dated 19/12/2023 and the mitigation measures outlined in this document.

Reasons: To ensure the scheme complies with the fire safety requirements set out in Policy D12 of the London Plan.

- 17 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 in accordance with BS4142:2014 'Methods for rating and assessing industrial and commercial sound.' The plant shall thereafter be installed together with any necessary mitigation measures and maintained in accordance with the details, unless otherwise agreed in writing by the local planning authority.

Reason: To protect acceptable local noise levels.

- 18 Prior to the occupation of the development, the applicant shall enter into a Memorandum of Understanding with the Local Planning Authority in order to provide a contribution to offset the impact of the development on local bus services.

Reason: To ensure there is sufficient public transport capacity to accommodate the development.

- 19 Prior to the commencement of works (inclusive of site clearance and demolition), bat emergence surveys shall be undertaken and reported on in accordance with the Bat Conservation Trust's "Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th edition".

Any mitigation measures set out shall be fully implemented prior to occupation. The measures shall be retained and maintained thereafter throughout the lifetime of the development.

Reason: The site has the potential to support roosting bats and to ensure that the Council fulfils its duties under the Conservation of Habitats and Species Regulations.

Reason for pre-commencement: The condition relates to impact to species which could be affected by demolition and site clearance, therefore details need to be known before commencement of development.

- 20 Prior to the commencement of works (inclusive of site clearance and demolition), an updated Peregrine Survey shall be undertaken and reported on. The assessment shall be submitted and approved in writing by the Local Planning Authority.

Any mitigation measures set out shall be fully implemented prior to occupation. The measures shall be retained and maintained thereafter throughout the lifetime of the development.

Reason: The PEA identified habitats suitable for roosting peregrine falcons and the Council must fulfil its duties under the Wildlife and Countryside Act.

Reason for pre-commencement: The condition relates to impact to species which could be affected by demolition and site clearance, therefore details need to be known before commencement of development.

- 21 Prior to commencement of the development hereby approved (including site clearance and demolition works), an Arboricultural Method Statement and Tree Protection Plan shall be submitted to and approved in writing by the Local Planning Authority.

Such details may include

- a. Location and installation of services/utilities/drainage including SuDS
- b. Details of demolition and construction including methodology associated with excavation within the RPA that may impact on the retained trees
- c. Detailed levels and cross sections to show raised levels or surfacing
- d. A specification for protective fencing to safeguard trees during construction phases and a plan indicating the alignment of the protective fencing.
- e. A specification for scaffolding and ground protection within tree protection zones.
- f. Tree protection during construction indicated on a TPP and construction activities in this area clearly identified as prohibited in this area.
- g. Details of site access, temporary parking, on site welfare facilities, loading, unloading and storage of equipment, materials, fuels and waste as well as concrete mixing and use of fires.
- h. Arboricultural supervision and inspection by a suitably qualified tree specialist throughout the process

The development shall thereafter be constructed fully in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

Reason: To protect retained existing trees including T10 Beech during the course of demolition and construction works in order to ensure that the character and amenity of the area are not impaired.

Reason for pre-commencement: Site clearance and demolition works have the potential to impact retained trees.

- 22 Notwithstanding the approved plans, prior to works commencing above ground on the development, a detailed landscaping scheme and implementation programme shall be submitted to and approved in writing by the Local Planning Authority. The landscaping scheme shall incorporate the hard and soft landscaping details proposed on the approved plans, as well as further details of, but not limited to the following:

- Proposed materials for all hard surfaces and the permeable qualities
- Precise locations of all Sheffield cycle stands to be provided within the public realm
- Details and sizes of all raised planters, including any trellises and defensible space adjacent to ground floor habitable windows
- Details of all external furniture (including refuse or other storage units) and informal seating/benches
- Species, locations and densities for all trees, grass and shrubs
- Details of SuDs landscape features including rain gardens and green roofs
- Play spaces including proposed equipment and surfacing
- Proposed walls, fencing, screening treatment and gates and any other permanent means of boundary treatment/enclosure, indicating materials, position and heights
- Details of any signs and signboards within the site
- Ensure that any trees removed to achieve the development are replaced to ensure equivalent canopy cover is achieved at time of planting
- Tree pits for all new tree planting
- Soil depth and composition on roof terraces, and details of plants and shrubs for these areas;
- Updated Urban Greening Calculations in excess of 0.33 UGF
- Confirmation of Biodiveristy Net Gain

- Details of the design, number and siting of ecological enhancements listed within the recommendations of the Preliminary Ecological Appraisal V 2.0 prepared by The Ecology Consultant dated 02.01.2019
- Details of any external CCTV installations
- A landscape management plan including long term design objectives, management responsibilities and five year maintenance programme and schedules for all landscaped areas,

The approved landscaping scheme and implementation programme shall be completed in full;
 (a) prior to first occupation or use of the building(s), in respect of hard landscaping components and boundary treatments;
 (b) during the first available planting season following completion of the development hereby approved, in respect of all other soft landscaping components.

It shall thereafter be mainlined fully in accordance with the approved Landscape Management and Maintenance Plan, unless otherwise agreed in writing by the Local Planning Authority.

Any trees and shrubs planted in accordance with the landscaping scheme which, within 5 years of planting are removed, dying, seriously damaged or become diseased shall be replaced in similar positions by trees and shrubs of similar species and size to those originally planted, unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure a satisfactory standard of appearance and setting for the development and to ensure that the proposed development enhances the visual amenity of the locality in the interests of the amenities of the occupants of the development and to provide tree planting in pursuance of section 197 of the Town and Country Planning Act 1990.

- 23 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. In addition, measures to control emissions during the construction phase relevant to a medium risk site should be written into an Air Quality and Dust Management Plan (AQDMP), or form part of a Construction Environmental Management Plan, in line with the requirements of the Control of Dust and Emissions during Construction and Demolition SPG. The AQDMP should also be submitted to and approved in writing by the Local Planning Authority and the development shall thereafter be constructed in accordance with the approved Construction Method Statement, together with the measures and monitoring protocols implemented throughout the construction phase.

The development shall thereafter be constructed in accordance with the approved Construction Method Statement, together with the measures and monitoring protocols implemented throughout the construction phase.

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

Reason for pre-commencement condition: Nuisance from demolition and construction activities can occur at any time, and adequate controls need to be in place before any work starts on site.

- 24 Prior to commencement of the development hereby approved (including site clearance and demolition works), a final Construction Logistics Plan (CLP) shall be submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be constructed fully in accordance with the approved Construction Logistics Plan, unless otherwise agreed in writing by the local planning authority.

Reason: To ensure the development is constructed in an acceptable manner and in the interests of pedestrian and highway safety.

Reason for pre-commencement condition: The condition relates to details of construction, which need to be known before commencement of that construction.

- 25 (a) Prior to commencement of the development (including demolition and site clearance) a Construction Employment and Training Plan shall be submitted to and approved in writing by

the local planning authority

(b) The applicant shall enter into a Memorandum of Understanding with the Local Planning Authority in order to secure a financial contribution (estimated to be £tbc for construction fee and £tbc for operational fee) to Brent Works for job brokerage services, any additional charge against the shortfall in provision of jobs as identified within the employment and training plan.

Reason: In the interest of providing local employment opportunities.

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

- 26 No piling shall take place until a Piling Method Statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure.

- 27 Prior to the commencement of development (excluding site clearance and demolition), a site investigation shall be carried out by competent persons to determine the nature and extent of any soil contamination present within that Phase. The investigation shall be carried out in accordance with the principles of BS 10175:2011. A report shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of building works that includes the results of any research and analysis undertaken as well as an assessment of the risks posed by any identified contamination. It shall include an appraisal of remediation options should any contamination be found that presents an unacceptable risk to any identified receptors.

Any soil remediation required by the Local Planning Authority shall be carried out in full in accordance with the approved remediation works.

Reason: To ensure the safe development and secure occupancy of the site.

- 28 Prior to the occupation of the development, a verification report shall be submitted to and approved in writing by the Local Planning Authority stating that remediation has been carried out in accordance with the approved remediation scheme and the land is suitable for end use (unless the Planning Authority has previously confirmed that no remediation measures are required).

Reason: To ensure the safe development and secure occupancy of the site.

- 29 Prior to the commencement of the relevant building (excluding demolition, site clearance, foundations and any below ground works) , further details of all exterior materials (including samples of key materials which shall be provided on site for inspection or in another location as agree, and/or manufacturer's literature) shall be submitted to and approved in writing by the Local Planning Authority. Such details may include (but not be limited to):

- brickwork
- mortar
- precast concrete
- windows
- metal work
- coping

The works shall be carried out in accordance with the approved details.

Reason: To ensure a high quality development which makes a positive contribution to the character and appearance of the local area.

- 30 Prior to the commencement of works (excluding demolition, site clearance, foundations and any below ground works), detailed drawings of the key construction detailing shall be submitted to and approved in writing by the local planning authority. Such details may include (but not be limited to) the junctions between different materials, fixing and application of cladding, detailing of reveals, soffits, parapets, balustrading, fins and other architectural features of the buildings. The development shall be constructed in accordance with the approved details.

Reason: To ensure a high quality development which makes a positive contribution to the character and appearance of the local area.

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

- (i) widening of Granville Road along its southern side fronting the site to provide 1.8m wide parallel parking bays, tree planting and a footway to a minimum width of 2m behind;
- (ii) widening of Carlton Vale along its northern side fronting the site to provide a 1.5m wide highway verge with a minimum 2m footway behind;
- (iii) realignment of Cambridge Road through the site and repaving in stone setts with a raised carriageway, parking bays and a 60mm kerb upstand between the carriageway and the footways, with a line of demarcation to be agreed between the adopted highway and the proposed urban park;
- (iv) construction of a 4m wide pedestrian footpath in block paving linking the two ends of Granville Road in front of proposed housing Block D, with removable emergency vehicle access bollards at either end;
- (v) construction of a 3.65m wide one-way access road in asphalt with 1.8m parallel parking bays in block paving on either side, a 500mm margin on its western side and a minimum 2m wide footway in paving slabs on its eastern side linking Granville Road with Carlton Vale with junctions including 4m kerb radii;
- (vi) amendments to on-street parking and loading bays within the Controlled Parking Zone to suit the new road layout;
- (vii) together with all associated lining, signing, street lighting, street furniture, electric vehicle charging points, tactile paving, planting, drainage, all associated Traffic Regulation Orders and any ancillary and accommodation works including any necessary alterations to statutory undertakers' equipment;

in general accordance with the layouts set out on plans 0042_PR_ZZ_GF_DR_L_0000/P00 and 0056_PR_ZZ_GF_DR_L_0002/P00.

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

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

- 32 Prior to first occupation of any part of the development, a Car Parking Management Plan shall be submitted to and approved in writing by the Local Planning Authority which includes:

- Details of the Approved Parking Homes which retain CPZ permits
- A strategy and coordinator to notify Highways in order to remove the allocated car parking spaces once they become redundant.

The proposed development shall be occupied in full accordance with the final approved Car Parking Management Plan unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that sufficient levels of parking are provided for existing residents.

- 33 No part of the development hereby approved shall be occupied until a revised Residential Travel Plan has been submitted to and approved in writing by the Local Planning Authority. The revised Residential Travel Plan shall reflect the Residential Travel Plan Version 0.6 dated January 2024 that was submitted within the Planning Application, but amended to include:

- Promotion of local Car Clubs amongst residents with free membership for residents for a minimum of three years
- Enhancement of monitoring through surveys that are use TRICS or i-TRACE methodology

The Revised Travel Plan must include the commitment to carry out the Initial Travel Survey within 6 months of Occupation of the Development.

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

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

- 34 Prior to first occupation or use of the development hereby approved, a revised Delivery and Servicing Plan (DSP) shall be submitted to and approved in writing by the local planning authority, which details delivery booking procedures, enforcement measures and revised monitoring and review arrangements. All delivery and servicing activity shall thereafter be carried out fully in accordance with the approved details, unless otherwise approved in writing by the Local Planning Authority.

Reason: To ensure that all delivery and servicing activities can be safely accommodated on site without adversely affecting the safety and amenity of residents or other users of the development or conditions on the highway network.

- 35 (a) Prior to commencement of works on site (excluding demolition) an Energy Assessment shall be submitted to and approved in writing by the Local Planning Authority. This shall include (but not be limited to) an Energy Assessment so as to demonstrate how the Development will be constructed to such specification to achieve a minimum 35% improvement on Part L of the Building Regulations 2021 Target Emission Rate ("TER") for CO2 emissions including through the use of on-site micro-generation.

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

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

(d) Following the construction of the building, the applicant shall enter into a Memorandum of Understanding with Greater London Authority in order to demonstrate compliance with the 'Be seen' post-construction monitoring requirement of Policy SI 2 of the London Plan.

The approved Energy Assessment (or as amended) shall be fully implemented and maintained for the lifetime of the Development unless otherwise agreed in writing with the Council.

Reason: In order to minimise greenhouse gas emissions in accordance with the principles of London Plan policy SI2.

- 36 Prior to commencement of development (excluding site clearance and demolition works),

details of how the development is designed to allow future connection to the South Kilburn district heating network, shall be submitted to and approved in writing by the local planning authority.

The development shall be completed in accordance with the approved details thereafter unless otherwise agreed in writing by the local planning authority.

Reason: To ensure the development is in accordance with the principles of London Plan Policy SI3 and Brent's Local Plan Policy BSUI1.

- 37 Prior to commencement of works above ground level, a revised Overheating Risk Assessment and Mitigation Strategy with detailed drawings to scale and materials for all external mitigation (where required) shall be submitted to and approved in writing by the Local Planning Authority. The work shall be carried out in accordance with the approved details.

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

- 38 Prior to commencement (excluding demolition, site clearance and the laying of foundations) a plan indicating the wind microclimate mitigation measures:

- solid or porous screens (at least 50% solid area) measuring at least 2m in height and 1m in width adjacent to entrances along the western façade of Blocks A and B

as per the recommendations of Pedestrian Level Wind Desk-Based Assessment dated May 2021 shall be submitted to and approved in writing by the Local Planning Authority.

The approved microclimate mitigation infrastructure shall be implemented prior to the first occupation of the development hereby approved.

Reason: To ensure that the development would establish a suitable level of comfort, in respect of wind conditions, for building users and pedestrians in the vicinity of the building, as well as to ensure that screens would have a suitable visual amenity impact.

- 39 Prior to the commencement of above ground superstructure works for the development, but excluding demolition, details for the provision of a communal television system/satellite dishes shall be submitted to and approved in writing by the Local Planning Authority. The development shall only be undertaken in accordance with the approved detail.

Reason: In order to mitigate the possibility of numerous satellite dishes being installed on the development hereby approved in the interests of the visual appearance of the development, in particular, and the locality in general.

- 40 Prior to the installation of any external lighting, details of such lighting shall be submitted to and approved in writing by the Local Planning Authority. This shall include, but is not limited to, details of the lighting fixtures, luminance levels within and adjoining the site, as well as ecological sensitivity measures that form a part of the lighting strategy. The lighting shall not be installed other than in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

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

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

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

- 42 Prior to the occupation of each building the post-construction tab of the GLA's whole life carbon assessment template should be completed accurately and in its entirety in line with the GLA's Whole Life Carbon Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage, including the whole life carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. This should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the published guidance.

Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation of the relevant building.

Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings.

- 43 Prior to the occupation of any phase of development, a Post Completion Report setting out the predicted and actual performance against all numerical targets in the relevant Circular Economy Statement shall be submitted to the GLA at: CircularEconomyLPG@london.gov.uk, along with any supporting evidence as per the GLA's Circular Economy Statement Guidance 2022. The Post Completion Report shall provide updated versions of Tables 1 and 2 of the Circular Economy Statement, the Recycling and Waste Reporting form and Bill of Materials. Confirmation of submission to the GLA shall be submitted to, and approved in writing by the Local Planning Authority, prior to occupation.

Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials.

- 44 Prior to commencement of development (excluding site clearance and demolition works), detailed plans shall be submitted to and approved in writing by the local planning authority demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development. The development shall be carried out in accordance with these plans thereafter and maintained as such in perpetuity.

Reason: To provide high quality digital connectivity infrastructure to contribute to London's global competitiveness.

- 45 Prior to the occupation of the building, the applicant shall enter into a Memorandum of Understanding with the Local Planning Authority in order to provide a contribution towards off site 12+ year old playspace.

Reason: To provide suitable playspace for future occupiers.

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 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.

- 3 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.
- 4 The Council recommends that the maximum standards for fire safety are achieved within the development.
- 5 Given the age of the buildings to be demolished it is possible that asbestos may be present. The applicant is reminded of hazards caused by asbestos materials especially during demolition and removal works and attention is drawn to your duties under the Control of Asbestos Regulations and must ensure that a qualified asbestos contractor is employed to remove all asbestos and asbestos-containing materials and arrange for the appropriate disposal of such materials.
- 6 The quality of imported soil must be verified by means of in-situ soil sampling and analysis. Brent Environmental Health do not accept soil quality certificates from the soil supplier as proof of soil quality.
- 7 The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 / developer.services@thameswater.co.uk to discuss the details of the piling method statement.

Any person wishing to inspect the above papers should contact Lena Summers, Planning and Regeneration, Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ, Tel. No. 020 8937 5233