

COMMITTEE REPORT

Planning Committee on
Item No
Case Number

11 December, 2024
06
20/4143

SITE INFORMATION

RECEIVED	11 December, 2020
WARD	Dollis Hill
PLANNING AREA	Brent Connects Willesden
LOCATION	403-405 Edgware Road, Cricklewood, London, NW2 6LN
PROPOSAL	Demolition of existing building and basements and replacement with mixed-use development (26,677 sq. m GIA) incorporating 22 storey building and 3 basements, comprising: flexible light industrial (Class E)/B8 employment space (in accordance with Part 3 of Schedule 2 (Class V) of The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)); Class C1 Hotel (including ancillary gym, spa and swimming pool); Class F.1 Conference Centre; Class F.2 community hall; basement car parking accessed from Oxgate Lane; cycle parking; internal service yard; coach drop-off lay-by; management and back of house areas; plant; roof garden and outdoor terraces; public realm improvements and associated works. (REVISED DESCRIPTION AUGUST 2024 - SEE REVISED DRAWINGS AND SUPPORTING DOCUMENTS ON WEBSITE).
PLAN NO'S	Refer to condition 2
LINK TO DOCUMENTS ASSOCIATED WITH THIS PLANNING APPLICATION	<p><u>When viewing this on an Electronic Device</u></p> <p>Please click on the link below to view ALL document associated to case https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=DCAPR_152957</p> <p><u>When viewing this as a 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 "20/4143" (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) and the prior completion of a legal agreement to secure the following planning obligations:

1. Payment of the Council's legal and other professional costs in (a) preparing and completing the agreement and (b) monitoring and enforcing its performance
2. Notification of commencement 28 days prior to material start
3. At least 10% of all employment floorspace to be provided as affordable workspace to be delivered as follows:
 - a) In perpetuity
 - b) At no more than 50% of comparable local market rates
 - c) Floorspace is to be provided as affordable research and development, light industrial, flexible office and studio workspace
 - d) Managed by one of the Councils approved affordable workspace operators
 - e) With a minimum lease term of 15 years or a minimum long-lease of 125 years
 - f) To a minimum fit-out standard as set out in the Affordable Workspace SPD
4. Employment and Training obligations Prior to a material start:
 - a) To inform Brent Works in writing of the projected number of construction jobs and training opportunities and provide a copy of the Schedule of Works;
 - b) To prepare and submit for the Council's approval an Employment Training Plan for the provision of training, skills and employment initiatives for residents of the Borough relating to the construction phase and operational phase of the Development
 - c) Financial contribution (estimated to be £112,304.50 for construction phased job opportunities and £171,050 for the operational phased job opportunities) calculated in accordance with Brent's Planning Obligations SPD) to Brent Works for job brokerage services.
5. Implementation and review of Parking Design and Management Plan, including management of coach parking
6. S38/S278 highway works under the Highways act 1980 to secure:
 - a) Widen and resurface the footways of Edgware Road and Oxgate Lane fronting the site, to provide a coach lay-by, to provide new accesses to the basement car park and service yard and to provide street furniture including bicycle stands and street trees, together with all associated signing, lining, lighting, drainage and other ancillary or accommodation works or works to statutory undertakers equipment rendered necessary, all in general accordance with drawing 1808-16.PL01(E);
 - b) Provision of a bus shelter for the nearby southbound bus stop on Edgware Road
7. Contribution towards review of local streets and implementation of any future Controlled Parking Zone (CPZ) - £50,000
8. Contribution towards pedestrian and cycle improvements, including a new cycle lane along Oxgate Lane in connection with improved connections to Brent Cross West station (£250,000)
9. Contributions to local bus network improvements, as requested by TfL (£162,500)
10. Contributions to way finding signage (£5,000)
11. Submission and approval of Workplace and Commercial Travel Plans for the development.
12. Energy assessment to include:
 - a) Prior to a material start submission and approval of a detailed design stage energy assessment. Initial carbon offset payment (estimated to be £275,496 / £95 per tonne) to be paid prior to material start if zero-carbon target not achieved on site.
 - b) Post-construction energy assessment. Final carbon offset payment (estimated to be £275,496 / £95 per tonne) upon completion of development if zero-carbon target not achieved on site.

c) 'Be seen' energy performance monitoring and reporting

13. Indexation of contributions in line with inflation from the date of committee resolution

Any other planning obligation(s) considered necessary by the Head of Planning. That the Head of Planning is delegated authority to negotiate the legal agreement indicated above.

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

Conditions

Compliance

1. Three year rule
2. Approved drawings and documents
3. Use restriction on industrial and commercial floorspace and no individual industrial units to exceed more than 1,000 sqm
4. Quantum of hotel rooms
5. 90 day restriction on occupation of hotel rooms
6. Accessible room requirements for hotel rooms
7. Compliance with Flood Risk Assessment and Drainage Strategy
8. Compliance with Preliminary Ecological Appraisal and Biodiversity Impact Assessment
9. Car parking and Electric Vehicle Charging Points
10. Tree Protection Measures
11. Non Road Mobile Machinery
12. Compliance with Microclimate mitigation measures

Pre-commencement

13. Historic England recording
14. Details of selective salvage and permanent heritage display in hotel lobby
15. Construction Logistics Plan
16. Construction Method Statement

During construction

17. Contaminated land
18. Piling Method Statement
19. District heating network connection
20. Fibre connectivity
21. External materials
22. Hard and Soft Landscaping
23. Secure by Design measures

Pre-occupation

24. Hotel Accessibility Management Plan
25. Community Access Plan
26. Delivery and Servicing Plan
27. External lighting
28. Whole Life Carbon Assessment
29. Circular Economy
30. Plant Noise

Post occupation

31. BREEAM

Informatives


As set out within the decision notice

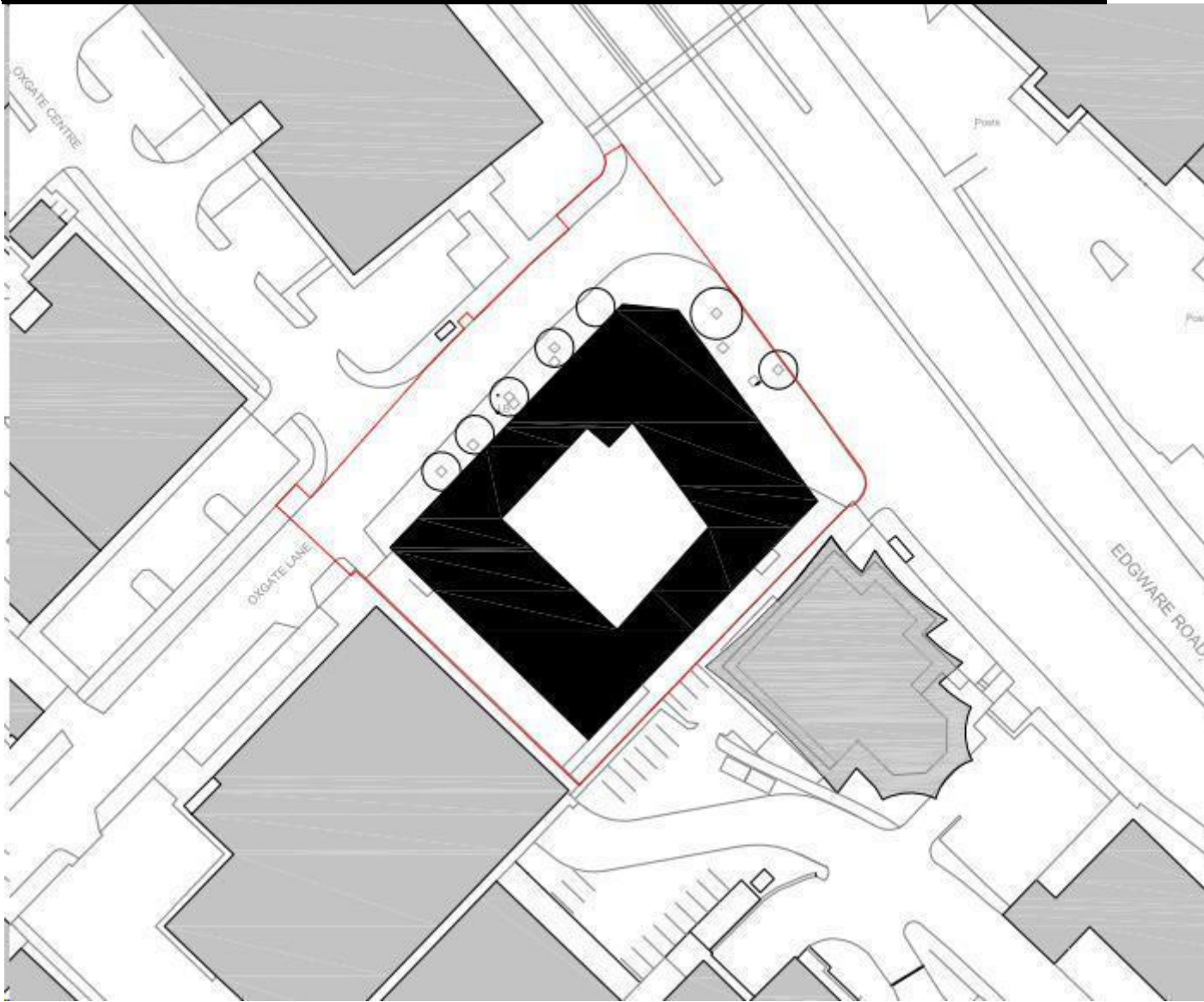
That the Head of Planning is delegated authority to make changes to the wording of the committee's decision (such as to delete, vary or add conditions, Informatives, planning obligations or reasons for the decision) prior to the decision being actioned, provided that the Head of Planning is satisfied 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, if by the "expiry date" of this application (subject to any amendments/extensions to the expiry date agreed by both parties) the legal agreement has not been completed, the Head of Planning is delegated authority to refuse planning permission.

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

SITE MAP

	Planning Committee Map
	Site address: 403-405 Edgware Road, Cricklewood, London, NW2 6LN
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This map is indicative only.

PROPOSAL IN DETAIL

The application proposes the demolition of the existing building and its replacement with a maximum 22-storey building, with an employment focused mixed-use development amounting to 26,677 sq. m GIA.

The proposed development would incorporate the following land uses:

- Replacement flexible employment space (Class E(g)(iii)/B8): 4,858 sqm (GIA)
- Hotel (Class C1): 210 bed hotel, café/restaurant, gym, health spa and swimming pool: 13, 655sqm
- Conference Centre (Class F.1): including 2 No. Halls (and access to a third hall – shared with the community facility, together with shared lobby and reception areas – 1,038 sqm (excluding shared hall)
- Community Hall (Class F.2): 1,133sqm

In addition, the development includes the following back of house and supporting elements:

- The provision of car parking (36 spaces including 5 disabled) serving the replacement industrial floorspace, the hotel and conference facilities and retail floorspace within two levels of the basement;
- A dedicated internal service yard, accessed from Oxgate Lane, with 436 sqm GIA on the ground floor, together with van 'drop-off' and loading area in Basement -1
- Several outdoor amenity spaces (comprising a podium terrace, sky-garden and two private terraces) (these would have a combined area of 1,391 sqm)
 - The provision of a coach drop-off on Oxgate Lane (capable of accommodating 2 No. standard 12 metre coaches)
- Public realm improvements, including regraded area in front of the building to provide level access into the building, and the planting of new street trees on Edgware Road
- Provision of 24 short stay cycle parking spaces (split between the Edgware Road and Oxgate Lane public realm areas)

Use	Existing GIA	Proposed GIA
Office and laboratories (Class E(g))	6,672	
Flexible Employment (Class E(g)(iii)/B2/B8)		4,858
Hotel (including conference centre, gym/spa, swimming pool and restaurants)		13,655
Conference centre		502*
Community hall (Class F.2)		497**
Ancillary plant, management, BOH		1,716
Total	6,672	22,400

EXISTING

The application site is located adjacent to the eastern boundary of LB Brent, which adjoins the LB Barnet. The site is located within the Staples Corner Strategic Industrial Location (SIL), and within the Staples Corner Growth Area. It is located at the junction of Edgware Road (A5) and Oxgate Lane, with the existing building fronting onto both streets.

The site has an area of 0.43ha, with the existing three-storey building set around a central courtyard, with two further basement levels. The building is locally listed (non-designated heritage asset), constructed between 1937 and 1939 and designed with a bomb-proof bunker during WWII, to be used by the Admiralty. Its lawful use is E(g) (offices and laboratories).

To the north of the site are the junctions of the North Circular Road (A406) with the M1, and the A41 (to the north east). Vehicular access to the site is via an access from Oxgate Lane, in the north west corner of the site, where there is a small servicing road adjoining the western edge of the site.

In terms of other designations, parts of the site and the surrounding road network are located within Flood Zone 3 for surface water flooding, and the site is within an Air Quality Focus area.

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: Two rounds of consultation took place with a total of 11 comments received objecting to the proposal, 93 comments received supporting the proposal and 4 neutral comments received. Comments were also received from a number of internal and external consultees. Further details of the comments received are discussed within the “consultation section” below.

Principle: The re-development of the site with replacement industrial floorspace and hotel provision is considered acceptable in line with London Plan and Local Plan policies. Given the Staples Corner Growth Area Masterplan and Design Code which has now been adopted, the quantum of replacement industrial provision is acceptable, with officers now assured that the layout and quality of this space would be attractive and viable for future users, with 10% of the workspace being affordable. It is accepted that the provision of a 22-storey hotel is required to support the viability of the scheme, and sufficient justification (including a sequential assessment) has been provided to ensure it is acceptable in this location outside of a Town Centre.

Design: The development proposes a tall building within a designated tall building zone. It's height is considered acceptable given its location within the tall building zone, and the emerging context.

Loss of non-designated Heritage Asset: The site would involve the demolition/ loss of the existing building, which is locally listed and therefore a non-designated heritage asset. Objections have been received on heritage grounds from the C20th Society and SAVE Britain's Heritage, as well as neighbouring residents, to the demolition of the existing building, which is considered to have historical significance given its status as a WWII underground bunker for the Admiralty. However officers have undertaken a robust assessment of the significance of the building, and consider that the scale of harm resulting from its loss would be outweighed by the benefits secured by the proposed scheme. Historic England have not raised any objections, and the GLA agree with officers' assessment.

Quality of hotel accommodation: The proposed hotel rooms would be of a good quality, all benefitting from good levels of light, outlook and ventilation. At least 10% of rooms would be wheelchair accessible, and all shared amenities would be fully accessible. The hotel also benefits from a variety of external amenity spaces.

Impact on neighbouring properties: The development would have a negligible impact on neighbouring residential properties in terms of daylight, with all windows and habitable rooms tested meeting BRE guidelines, which reflects the predominantly commercial surrounding context. Similarly, there would be a limited impact in terms of sunlight, overshadowing and privacy impacts. The emerging Growth Area context must also be taken into consideration, with the surrounding area likely to be subject to increasing density where flexibility to the BRE Guidelines needs to be shown.

Transport: A reduction of 76 car parking spaces within the site from that initially proposed, to a maximum of 36, has been achieved in order to ensure that the development would be sustainable and meet the wider aims of the SCGA. Financial contributions would be secured within the S106 Agreement towards public realm and access improvements, particularly to improve future links to Brent Cross West Thameslink station. Contributions towards improved bus routes, and upgrades to the adjacent bus shelter, are also secured as a result of TfL comments. Issues with the service yard have now been overcome. The submitted Transport Statement confirms that existing trip generation would be limited and would not have a noticeable impact on the local highway network. 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: Of the 7 existing trees on site, 2 category B trees would be retained on the Edgware Road frontage with 5 existing trees to be lost to accommodate the development. The scheme would include the planting of 60 new trees within the site (in the various roof terraces) and along the street frontages (this would account for a net increase in 55 trees within the site). The site is not within any designated ecological assets and there are no SNIC sites in proximity to the site. It is not likely to form habitat for any protected species, given its extensive hard-surfacing and limited green components. Net gain in biodiversity is to be achieved as a result of development, as well as a significant

improvement to the Urban Greening Factor score. Flood risk has been assessed, and no objections are raised by the Local Lead Flood Authority on these grounds. A range of 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 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

In 2014 and 2015 there were enforcement investigations into changes of use to mixed residential/ religious use and for religious purposes. These uses subsequently ceased.

92/1762: Certificate of lawfulness granted on 15th Dec 1992 for proposed use of basement as B1 use.

92/1425: Certificate of lawfulness granted on 13th Oct 1992 for proposed use of building above ground for B1 use.

CONSULTATIONS

Public Consultation (original scheme – Feb 2021)

A total of 673 addresses were initially notified of the development on 12/02/2021.

A Site Notice was displayed on 12/03/2021.
A Press Notice was published on 18/02/2021.

A total of 45 written comments were received to the proposals at this stage, from adjoining residents and interested parties (40 of which are supporting and 4 are objecting with 1 neutral comment).

The grounds for objection are summarised in the table below:

Objection	Response
Loss of Historical assets	Refer to sub section "Heritage Considerations" below
Lack of parking and vehicles should have waiting time limit	Refer to sub section "Transport and Highways" below.
Additional traffic on the street	Refer to sub section "Transport and Highways" below.
Signs are required so drives would not be advised to go to the wrong way	Refer to sub section "Transport and Highways" below.
New job opportunities should be secured and should not be limited to low skilled job or part time job. Discount should be given to start-ups.	Refer to sub section "Employment and Training" below. The scheme would also secure affordable workspace provision as set out within the Heads of Terms.
The building should benefit local residents if granted planning permission for C1, F1, and F2 uses.	Refer to sub section "Community Uses" below.
Seek clarity on the designated F2(b) space, including the second-floor hall and fourth-floor hub, and oppose permission for only shared space.	Refer to sub sections "Principle of proposed hotel and conferencing use" and "Community Uses" below.

A total of 40 representations in support of the application have been received. The main points made in support of the application are set out below:

Nature of support comment	Response
The proposed facilities would be beneficial to	Comment acknowledged.

the residents	
Great design with appropriate building height	Comment acknowledged.
More job opportunities provided in the area	Comment acknowledged.
New amenities to provide for employee	Comment acknowledged.
The proposed parking would ease congestion	Comment acknowledged.
Current site is unpleasant and dangerous with no benefit to the community	Comment acknowledged.

Revised scheme (August 2024)

A total of 464 addresses, including all those who initially commented on the application, were notified of the revised drawings and supporting documents by letter on 04/09/2024.

A site notice with the revised description of development was displayed on 02/09/2024
A press notice with the revised description of development was published on 05/09/2024

A total of 53 written comments were received to the proposals at this stage, from adjoining residents and interested parties including Dollis Hill Residents Association, LAMAS and SAVE Britain's Heritage (43 of which are supporting and 7 are objecting with 3 neutral comment).

The grounds for objection are summarised in the table below:

Objection	Response
Concerns regarding construction works impact on the neighbouring environment including noise	It is acknowledged that noise from construction can result in some unavoidable noise impact. The hours of construction are controlled through Environmental Health legislation to mitigate the impact as far as possible while a Construction Management Plan and Construction Logistics Plan would be secured through condition.
Additional traffic on the street	Refer to sub section "Transport and Highways" below.
Housing is preferred over a hotel	Refer to sub sections "Local Plan and SCGA Masterplan and Design Code SPD" and "Principle of proposed hotel and conferencing use" below.
Loss of Historical Assets	Refer to sub section "Heritage Considerations" below
Accessibility of podium terraces	A condition is secured requiring details of an accessibility management plan for the proposed hotel use.
Concerns regarding the design and the inappropriate height of proposed building	Refer to sub section "Urban design considerations" below.

A petition has been set up against the demolition of Oxgate Admiralty Citadel and advocates for its transformation into an indoor skatepark. Four signatures have been collected.

Representations have also been received on behalf of the Wing Yip site to the immediate south. The main issues raised are summarised as follows:

- Lack of engagement with the Wing Yip site from the applicant
- Prematurity of the development in the absence of a formally adopted Masterplan
- Un-neighbourly relationship with the Wing Yip site/ southern boundary
- Lack of active frontage/ activation to public realm
- Unclear how proposed community hall and conference centre would operate
- Concerns with vehicular access/ conflicts along Oxgate Lane
- Impacts during construction works
- Lack of utilities assessment

***Officer comments:** It is considered that these issues have all been addressed in the main remarks section below, or have been clarified by the applicants.*

A total of 42 representations in support of the application have been received. The main points made in support of the application are set out below:

Nature of support comment	Response
The proposed facilities would be beneficial to the residents	Comment acknowledged.
Great design with appropriate building height	Comment acknowledged.
More job opportunities provided in the area	Comment acknowledged.
New amenities to provide for employee	Comment acknowledged.
The proposed parking would ease congestion	Comment acknowledged.
Current site is unpleasant and dangerous with no benefit to the community	Comment acknowledged.
Support economic growth of the area	Comment acknowledged.
The proposed green space would be beneficial in terms of sustainability	Comment acknowledged.
Better disability access and cycle parking	Comment acknowledged.

Statutory/ External Consultees

Greater London Authority (Stage 1 comments): The GLA initially commented on a number of strategic issues with the scheme in February 2021, including land use principles, urban design and heritage, transport and sustainable development. Objections were raised on a number of these issues, mainly around the prematurity of re-development of the site in the absence of a Masterplan, the loss of industrial floorspace within SIL, and the nature of the proposed hotel use.

Since these comments, there have been lengthy discussions with the applicants and a number of amendments have been made, as well as significantly the adoption of the SCGA Masterplan and Design Code in November 2023. The GLA have briefly commented on the amendments submitted in Aug 2024, as follows: *The site appears to be identified for residential use with café / retail at ground floor level so from an industrial perspective the re-provision of industrial is welcome, especially the B8 element. Given the strategic evidence, the amount of B2/B8 floorspace should not be capped.*

The design and operation of the industrial provision need to ensure a true industrial occupier can use the space eg appropriate floor to ceiling heights, dedicated access, dedicated loading, operating hours – ideally 24/7, especially for the B8 element – please refer the applicant to the draft Industrial land and uses LPG for some introductory design guidelines. Need to apply the Agent of Change.

In addition, whilst the hotel use does not accord with London Plan policy E4, the principal of introducing non-industrial uses is established by the Local Plan, subject to a masterplan. Should the proposal for a hotel be accepted, this should not result in the further erosion of the SIL/industrial only area at Staples Corner.

Amendments to the sustainability and energy statements have also been reviewed by the GLA's energy team - there are no in principle objections, subject to conditions and further work to be undertaken before Stage 2 referral.

Officer comments: *These comments have been noted and are considered and addressed in the land use and principle of development section of the report.*

Transport for London: TfL have commented on the revised scheme and while amendments are made, they have requested conditions and financial contributions should be secured via legal agreement. These are addressed in the relevant transport sections of the report.

Thames Water

No objections regarding foul and surface water infrastructure capacity. Condition requiring the submission of a piling method statement for approval.

LB Barnet

No objections raised.

Metropolitan Police - Secure by Design Officer

No objections but recommend a condition is secured to achieve secured by design accreditation to silver

award

Historic England

No comments to make, views of the LPAs heritage officer should be sought on the proposals.

Twentieth Century Society

Objection. The existing building, the Oxgate Admiralty Citadel, is of historical significance and is recognised as a Locally Listed Non-designated Heritage Asset. The building should be renovated and adapted for reuse.

Officer comment: These issues are addressed in more detail within the heritage section of the report.

SAVE Britain's Heritage

Re-iterates earlier objections on heritage and climate grounds. The proposed demolition of the locally listed building fails to comply with paragraphs 157 and 209 of the NPPF, Brent's Historic Environment Place-Making Strategy (2019) and the SCGA Draft Masterplan and Design Code SPD (May 2024).

Officer comment: These issues are addressed in more detail within the heritage and sustainability sections of the report.

Natural England

No objections subject to a condition requiring the installation of bird friendly glass solutions, as outlined in the submitted Ecological Impact Assessment, as suitable mitigation to ensure flightlines are not unduly impacted by the proposed tall building.

Fire Brigade

Applicant advised to ensure that plans conform to Part B of Approved Document of the Building Regulations.

Internal consultation

Environmental Health

Environmental health raises no objections to the application subject to a number of conditions relating to internal noise levels, construction noise and dust and air quality impact, and contaminated land. See detailed considerations section of report for further comments on these issues.

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) and also following the advice set out in Brent's SCI. In light of restrictions during the Covid-19 pandemic, a 'virtual' public exhibition went 'live' in May 2020, with over 2,800 local residents and businesses invited within a 700m radius of the site. Local councillors and key stakeholders were also invited to attend by email and letter. The exhibition took an online form with the same type of materials – eg. banners, feedback mechanisms and contact details of the project team – as would be available with a physical exhibition. Full details of the exhibition are available within the applicant's submitted SCI.

Feedback received through the course of this consultation programme has been taken into consideration when finalising the proposals and is evident in the final planning application.

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.

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

The key policies applicable to this proposal are:

London Plan

GG1 Building Strong and inclusive communities
GG2 Making the best use of land
GG3 Creating a healthy city
GG5 Growing a Good Economy
GG6 Increasing Efficiency and Resilience
D1 London's Form and Characteristics
D4 Delivering Good Design
D5 Inclusive Design
D8 Public Realm
D9 Tall buildings
D12 Fire Safety
D14 Noise
E3 Affordable workspace
E4 Land for industry, logistics and services to support London's economic function
E5 Strategic Industrial Locations (SIL)
E7 Industrial intensification, co-location and substitution
E10 Visitor infrastructure
HC1 Heritage Conservation and Growth
G1 Green Infrastructure
G5 Urban Greening
G6 Biodiversity and access to nature
G7 Trees and Woodlands
SI1 Improving Air Quality
SI5 Water Infrastructure
SI7 Reducing Waste and Supporting the Circular Economy
SI12 Flood Risk Management
SI13 Sustainable Drainage
T2 Healthy Streets
T4 Assessing and Mitigating Transport Impacts
T5 Cycling
T6 Car Parking
T7 Deliveries, servicing and construction

Brent Local Plan

DMP1 Development Management General Policy
BD1 Leading the Way in Good Urban Design
BD2 Tall Buildings
BP2 East
BEGA2A Staples Corner Growth Area
BSI1 Social infrastructure and Community facilities
BE1 Economic Growth and Employment Opportunities for all
BE2 Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS)
BE4 Supporting Strong Centres
BE9 Visitor Accommodation and Attractions
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
BSUI4 On Site Water Management and Surface Water Attenuation
BT1 Sustainable Travel Choice
BT2 Parking and Car Free Development
BT3 Freight and servicing

The following are also material planning considerations:

National Planning Policy Framework

National Planning Policy Guidance

Supplementary Planning Documents/Guidance (SPD/SPG):

Staples Corner Growth Area Masterplan and Design Code (2024)
Sustainable Environment and Development (2023)
Brent SPD1: Design Guide for New Development (2018)
Basement SPD (2017)
Planning Obligation (2022)
Mayor's Sustainable Design and Construction SPG
National Design Guide
Brent Waste Planning Guide

Regional

Air Quality Positive 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
Urban Greening Factor LPG

Draft Supplementary Planning Documents:

Regional

Industrial Land and Uses LPG (2023)
Fire Safety LPG

DETAILED CONSIDERATIONS

Principle of industrial floorspace re-provision

Policy context

Local Plan and SCGA Masterplan and Design Code SPD

1. The site is located within the Staples Corner Strategic Industrial Location (SIL). Policy BE2 of the Local Plan states that the Council is committed to exceeding the additional 0.6ha equivalent of industrial floorspace need within the plan period. In order to do this, within SIL and LSIS, development will be supported where it intensifies industrial uses, including those for waste, utilities and transport infrastructure. For Staples Corner SIL, a principle of intensification with some co-location subject to the comprehensive masterplan approach will apply, with replacement industrial floorspace needing to meet the following requirements:
 - a) Conformity with London Plan policy E7;
 - b) a net increase in industrial floorspace resulting in a minimum 0.65 plot ratio or the existing floorspace total, whichever is greater, across the masterplan area;
 - c) a mix of research and development, light industrial, general industrial and storage and distribution floorspace will be delivered reflective of borough needs, including start-up and move on space;
 - d) proactive engagement with existing businesses to seek to retain them on site where possible, and support for any businesses that cannot be incorporated to relocate off site;
 - e) 10% of employment floorspace to be affordable workspace;
 - f) the development is of a high quality design and will result in sustainable development, well served by community facilities and open space; and
 - g) any potential conflicts between uses can be mitigated and a high standard of amenity achieved.
2. In line with the requirements of London Plan Policy E7 and Brent Local Plan Policies BEGA2A and BE2, Brent Council adopted the Staples Corner Growth Area Masterplan and Design Code SPD in November 2024. It therefore forms a material consideration as part of the assessment of planning applications within the Growth Area
3. The aim of the SCGA Masterplan and Design Code SPD is to help enhance Staples Corner as an attractive, prosperous and sustainable place, supporting new industrial business and employment growth,

as well as new residents to the neighbourhoods. The document also recognises the need to protect and intensify the majority of the industrial land solely for industrial purposes, whilst allowing some either for a mix of uses incorporating some industrial or for residential led development, capable of delivering:

- *Modern, fit for purpose industrial spaces for local businesses including logistics, light industrial units and affordable workspace;*
 - *Opportunities for employment, skills and training for local people;*
 - *A minimum of 2,200 new high quality homes, including affordable homes and family sized dwellings;*

 - *A range of new local services and community spaces that support interaction and community cohesion;*
 - *New open spaces, incorporating play for a range of ages, and public realm improvements particularly along the North Circular Road and Edgware Road;*
 - *A high quality environment that is safe and accessible to everyone;*
 - *An industrial movement network that keeps HGV and large vehicles to the strategic road network, with other streets encouraging walking and cycling over private motor vehicles, and better connect Staples Corner to the surrounding area;*
 - *A place that achieves the highest standards of sustainability to support a low carbon circular economy.*
4. The SCGA Masterplan estimates that the Growth Area includes 179,300 sqm GIA of industrial floorspace (across circa 100 individual units) together with 46,100 sqm GIA in active non-industrial use. It is of note that the SCGA Masterplan does not include the application site within this floorspace calculation, but instead the building is recognised as a long term vacant property. In terms of proposed land uses, a Strategic aim of the masterplan is to:
 - a) Intensify substantial SIL designation
 - b) New dense mixed-use town centre development
 - c) Explore options for colocation of industrial and residential uses
 - d) Integrate new commercial, business, service, cultural, leisure and community uses

 5. The SCGA Masterplan and Design Code SPD divides the Growth Area into nine sub-areas, with the application site falling within Sub-Area 9 (referred to as “Wing Yip & Oxgate Centre”). In its assessment of the existing land use and floorspace situation of Sub-Area 9, the Masterplan identifies the application site as the only vacant building within the sub-area. The illustrative masterplan suggests that Sub-Area 9 is capable of accommodating 7,357 sqm of industrial floorspace and 164,370 sqm of non-industrial floorspace, with the latter including provision of 1567 new homes. It is estimated the Sub-Area 9 is capable of creating 720 jobs.

 6. The document presents two options for how Sub-Area 9 could be developed, with each containing a mixed use development comprising light industrial and café/retail uses in a podium, above which would either be high density residential accommodation or “Hotel uses may be considered acceptable subject to compliance to acceptable policy/guidance”.

London Plan

7. Policy E4 of the London Plan 2021 seeks to ensure that a sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions is provided and maintained. The policy also sets out that London’s land for industry, logistics and services falls into three categories: Strategic Industrial Locations (SIL), Locally Significant Industrial Sites (LSIS) and non-designated industrial sites. The policy also states that the retention, enhancement and provision of additional industrial capacity across the three categories of industrial land should be planned, monitored and managed. It further states that any release of industrial land in order to manage issues of long-term vacancy and to achieve wider planning objectives, including the delivery of strategic infrastructure, should be facilitated through the processes of industrial intensification, co-location and substitution set out in Policy E7 and supported by Policy E5.

8. Policy E5 of the London Plan states that SIL sites should be managed proactively through a plan-led process to sustain them as London’s largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London’s economy. It supports industrial-type activities in SIL and development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial-type activities and their ability to operate on a 24-hour basis.

9. In recognition of the need to intensify industrial capacity within London, Policy E7 of the London Plan

2021 actively encourages development proposals to intensify industrial use of selected sites, and where this is possible, and delivers increases in capacity, it may be possible through a plan-led or masterplan-led approach to deliver residential or other uses. Part D of this policy sets out that intensification and co-location on SIL could be brought forward as part of a plan led (or masterplanning) process where:

- 1) *The function of the surrounding industrial uses is not compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation noting that many businesses have 7-day/24-hour access and operational requirements*
- 2) *The intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied*
- 3) *Appropriate design mitigation is provided in any residential element to ensure suitable amenity levels are achieved.*

10. Additionally, some weight is placed on the draft Industrial Land and Uses LPG, which was published by the Mayor for public consultation in late 2023/ early 2024 and is still under review before final publication. As well as supporting the approach to co-location and intensification which is set out by Policies E5 and E7, the guidance also provides some useful detail in terms of how proposals for industrial re-provision should consider key transport, environment and amenity, and design aspects at an early stage to ensure efficient and successful industrial spaces are provided. Some of these aspects are outlined in more detail within later sections of the report.

Assessment

11. The application proposes 4,858 sqm of flexible light industrial (Class Eg (iii))/B8 employment space. Being flexible, the floorspace is capable of being occupied by either a light industrial or B8 use (in its entirety, or in constituent parts) and for a range of different business sizes. The nature of this floorspace is fully compliant with the type of floorspace which London Plan Policy E4 identifies as being suitable for land allocated as SIL.
12. However, the policy basis which governs the provision of industrial floorspace that should be included in the redevelopment of the application site has evolved over the course of the application. Both Brent officers and the GLA raised concerns with both the initial quantum of floorspace and the quality of this space for future occupiers. The GLA's initial Stage 1 comments stated that:

"Whilst it is acknowledged that this is more than the existing site provides (assuming the building is Class B1a), the scheme fails to sustain the industrial focus of the site as the majority of floorspace on the site would be associated with non-SIL appropriate uses (hotel and conference centre)."
13. However, crucially from a policy perspective, the SCGA Masterplan has evolved from its very early stages at the time of the initial submission of this application in early 2021, to now being adopted in November. One of the GLA's other principal concerns was the lack of a Masterplan being in place, and that it would be premature to approve the re-development of the site without an industrial focus in the absence of this.
14. The SCGA Masterplan now clearly identifies areas where industrial floorspace should be increased (broadly in Sub-Areas 1 to 6) and areas where they can be reduced (which in general terms is the southern part of the growth Area, closest to the Brent Cross West station - the area within which the application site is located in). The Masterplan accepts a reduction in industrial floorspace in the Sub-Area within which the application site is located (Sub Area 9) – from 10,119 sqm to 7,357 sqm of industrial floorspace.
15. At 4,858 sqm, the application site is therefore proposed to provide two thirds of the industrial floorspace which the Masterplan suggests is appropriate for Sub-Area 9. Therefore, in line with London Plan Policies E4, E5 and E7, Brent Council's aspirations are to see a doubling of the industrial floorspace with the Staples Corner Growth Area if development comes forward in line with the expectations of the Masterplan. Accordingly, there should be no concern within the quantum of industrial floorspace proposed on the application site, and the benefits this will bring to the overall supply of industrial floorspace in Sub-Area 9 (and the wider growth area) is supported in policy terms.
16. Since the initial submission, more work has also been undertaken regarding the specification of the industrial floorspace, and this is contained within both the revised design and access statement and planning statement. The proposed space has been considered against the specifications in the GLA

Intensification and Co-Location Study: Design and Delivery Testing, which reflect occupier requirements for different typologies. In terms of ceiling heights occupiers for workshops and studio space as a minimum require 3.5-4.4metres. For other industrial uses, ceiling heights need to be higher.

17. The proposed industrial space now meets this requirement, with ceiling heights of between 5m (to underside of beam) and 6.5m (to structure/ceiling) on all levels above ground level, with the existing constraints of the building meaning that only 3.6m ceiling heights are achieved at basement level.
18. The illustrative plans include a mix of co-working space and individual units - ranging in size from 22 sqm to 474 sqm (within the First and Second Floors), which (according to GMW's employment land assessment) are capable of accommodating 'micro' and 'small' businesses. In addition, the employment floorspace in Basement -3 (793 sqm) is larger and capable of accommodating a small business.
19. All of the illustrative workspaces have access to one of the service lifts, via a 3.5 metre service corridor, together with wide entrance doors. Details of how goods can be moved through and around the building (including from the service yard and basement spaces) to different parts of the building are illustrated in the Design & Access Statement. The indicative layouts/diagrams illustrate some of the units accommodating mezzanine floors.
20. Having worked with AMAFHH's design team in the evolution of the proposed industrial floorspace, GMW are confident that the application scheme is of the quality and design which businesses are looking for. As a result, GMW's advice (in their Employment Land study) is that:

"There are no employment land issues which would suggest that the development proposal should be refused. Indeed, it would be perverse to leave such an important site vacant given it is incapable of re-use or redevelopment in its own right for a standard scheme of single storey units for industrial and warehouse occupiers.."

21. The proposed workspace has also been tested and designed in line with latest requirements for modern flexible employment space (including the suitability of head heights, service access/lifts, floorplates etc.) as set out in the Mayor of London's Industrial Intensification Primer Report (2017) and more recently in the London Plan Guidance - Draft 'Industrial Land and Uses' (November 2023).
22. The former document advises that, in the case of 'smaller scale stack industrial units', "multi-storey options should be considered", noting that "Smaller businesses may operate adequately on upper floors where there is access to a goods lift and shared yard". Both a goods lift and a shared yard are present within the industrial floors, with the shared service yard capable of accommodating three vehicles at any one time, whilst still allowing a vehicle to manoeuvre within the yard. In addition, the proposals include goods lifts which connect the service yard to all areas of the industrial floorspace.
23. Agent of Change principles have been incorporated, in terms of sound insulation and mitigation and the orientation of windows. Details of the noise mitigation strategy would be secured by condition if the application were to have been recommended approval.

Affordable workspace

24. Policy BE2 seeks 10% of employment floorspace to be affordable workspace in redevelopment of LSIS sites. This is reinforced in London Plan Policy E3. The applicant's planning statement and supporting employment land assessment set out the strong demand in Brent for small and start-up business floorspace within the borough, and the applicant has confirmed their commitment to securing 10% of the proposed employment floorspace as affordable by definition, i.e. to be let at 50% of market rent, via legal agreement.

Summary of industrial floorspace provision

25. Overall, officers consider that the applicants have done more work to improve the quality and layout of the proposed industrial floorspace since the initial submission, and therefore the proposed scheme now has the potential to offer a significant amount of industrial floorspace which meets a recognised need for this type of floorspace (demonstrated in market analysis undertaken in the supporting Employment Land Study. The flexible nature of the floorspace is considered to contribute to meeting Brent's employment needs, including from 'micro businesses' (employing 1-9 staff) to 'small businesses' (employing 10-9 staff).

26. The location of the proposed workspace benefits from the site's improved transport links (which have significantly improved following the opening of Brent Cross West station), with the multi-level floorspace model fitting with the latest guidance (and design requirements) for such floorspace.
27. In summary, the proposed development accords with the needs to intensify employment floorspace (recognised in London Plan Policy E7 and Local Plan Policies BE2, BP2 and BEGA2A). Furthermore, the application proposal represents an innovative solution to achieving the intensification and co-location of floorspace within this growth area.

Principle of proposed hotel and conferencing use

28. As outlined above, London Plan policies E4, E5 and Local Plan Policy BE2 protect SIL for light and general industrial, storage and logistics/distribution, utilities, waste management, research and development and light industrial uses. The proposed hotel and conference centre is not a SIL compliant use and as such, the proposal is contrary to both London Plan and Local Plan policy. The applicant has stated that the hotel and conference centre is required to make the industrial floorspace viable.
29. Additionally, hotels and conference facilities are defined as main town centre uses in the NPPF, and directed to town centre locations in accordance with the sequential approach. Brent Local Plan policy BE9 directs future hotel provision to be encouraged in the two major town centres of Wembley and Kilburn, with other town centre locations appropriate in accordance with the sequential approach. They will also only be supported provided they:
 - a) do not significantly compromise the supply of land for new homes on allocated housing sites and the council's ability to meet its housing targets;
 - b) are inclusive and accessible, with applications for detailed planning permission accompanied by Accessibility Management Plans;
 - c) are not occupied by any resident for 90 consecutive days or more; and
 - d) create active ground floor frontages.
30. Whilst London Plan policy E10 requires a sufficient supply and range of serviced accommodation to be maintained, this does not override the site being in an out of centre location and subject to the sequential test. The applicant has submitted a sequential assessment to support the application.
31. PPG paragraph 012 states '*Use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. Robust justification will need to be provided where this is the case, and land ownership does not provide such a justification.*' In determining the area of search, the applicant has considered the applicants' market and locational requirements.
32. Initially concerns were raised by officers about the submitted sequential test lacking proper assessment of Kilburn, Burnt Oak/ Colindale, Willesden Green, Edgware and Wembley town centres. The applicant submitted an addendum to the original sequential assessment including these centres, with the exception of Edgware. Edgware Town Centre is excluded on the basis of transport links not meeting the locational requirements for the proposed hotel operator, with Edgware Station being a 30 minute journey to Kings Cross. Following review of the addendum information, officers consider that the sequential test has been passed.
33. Despite this, the appropriateness of a hotel within a SIL still needs to be justified in terms of policy BE2 and London Plan policies E4 and E5. This is aided by the adopted SCGA Masterplan, which clearly outlines that the site would be appropriate for co-location, and sets out the majority of the replacement industrial floorspace would be located in sites to the north of the masterplan area (i.e. within a cluster closer to the A406).
34. The Masterplan clearly for a wider range of uses than would ordinarily be appropriate in SIL, including hotels. The overall proposals represent a significant uplift in floorspace on site and therefore in employment generation, whilst current limited alternative provision close by, means it could be beneficial to supporting existing business functions, either for its meeting spaces or accommodation for visitors to businesses, and crucially it is close to the new Brent Cross West station. Weight is given to the Masterplan objectives and therefore officers do consider there is sufficient justification for a hotel in this location.
35. In support of the hotel use, the applicants have also submitted letters of interest from two hotel operators

(Hilton Hotels and Ability Group) who have assessed of the suitability of the proposal site and concluded that it would meet their criteria for operating requirements. The Ability Group have highlighted that their interest is specific to Staples Corner, as they see the benefits of tapping into the economic growth in the area (arising from the two regeneration projects) as well as the improved public transport connectivity. Hilton Hotels letter makes clear that they consider the application site is in a different catchment area to Wembley (where Hilton already operates a hotel), stating “...we are of the belief that the opening of a hotel at Staples Corner would not compete against the Hilton Wembley or potential future hotels in the Wembley area, since the demand generators for the two locations are not the same”.

36. With regard to the proposed conferencing facilities, the applicants have outlined in the applicant's planning statement that there is only one hotel in the immediate vicinity (Holiday Inn Express, within approximately 1km to the north-east) which provides an on-site business centre, including meeting rooms for hire. However, the largest conference room they offer only has capacity for 100 people, whereas the application proposal includes rooms capable of accommodating up to 500 people. Therefore, the Holiday Inn Express is unable to cater for the larger events which are expected to operate from the proposed development.
37. Given the above, officers consider that sufficient justification has been presented - most importantly in the form of the sequential test which has been passed - to demonstrate that this would be an appropriate location for a hotel use despite some conflict with both London and Local Plan policies. Conditions are attached to ensure that an Accessibility Management Plan is submitted for approval to ensure the hotel is fully inclusive and accessible, and that there is no future occupation by any resident for 90 consecutive days or more, to ensure compliance with Policy BE9 of the Local Plan.

Community uses

38. The second part of Local Plan Policy BS11 focuses on new social infrastructure, and states that *'proposals for new or enhanced social infrastructure facilities, including the consolidation of existing facilities, will be supported by the Council where:*
- e) easily accessible by public transport, walking and cycling, preferably in town centres or Growth Areas;*
 - f) located within the community they are intended to serve;*
 - g) provided in flexible and adaptable buildings;*
 - h) ideally co-located with other social infrastructure uses; and*
 - i) maximising wider community benefit, through if necessary, requiring formal community use agreements.'*
39. One of the key overarching objectives of the SCGA Masterplan and Design Code SPD is to increase the quantum and quality of community spaces within the Growth Area. Although the detailed Sub-Area analysis does not specifically indicate the provision of social and community facilities in this part of the Growth Area (i.e. within Sub Area 9), the Land Use Strategy does outline that Local Community uses should be directed to this section of the Growth Area, i.e. adjacent to Edgware Road, between Oxgate Lane and Humber Road. The Design Code also goes into detail on how encouraging developments in Staples Corner to enable community groups or operators in voluntary and community sector to rent space in the area.
40. The applicant's planning statement sets out (paras. 7.99-7.101) that the scheme would include the provision of a community hall, providing a large event space of approx. 547sqm NIA) available for the community to use for events, activities and private hire, including exhibitions, community meetings, dance and fitness classes.
41. The statement goes on to outline that there may be occasions where the community event space needs to be enlarged, and this is catered for by designing the space to incorporate the two conference centre halls, which are also located on the third floor. The applicants have explained that in order to limit the potential impact of such large events on the transport infrastructure and to reduce the potential for such events affecting adjoining businesses within existing Industrial Estates, a condition is accepted which limits the number of occasions for this amalgamation to occur to no more than 20 days per calendar year (and only 11 of these can be on consecutive days). However given the high public transport accessibility and travel plan to be secured, officers consider that this restriction is not considered necessary.
42. The community hall would provide a large event space at third floor level (of approximately 497 sqm, including external terrace but excluding shared foyer and WCs/ changing rooms) available for the community to use for events, activities and private hire. It is anticipated the space will be used for events such as exhibitions, community meetings, dance and fitness classes, conferences etc. The objective is to

create flexible space, which can house a single event, or be easily sub-divided into smaller spaces.

43. There may be occasions when the community event space needs to be enlarged. To accommodate such a scenario, the scheme has been designed to enable the community event space to be amalgamated with the two conference centre halls (which are also located on the third floor), bringing the total amount of community space potentially to just over 1,000sqm. However, to limit the potential impact of such large events on the transport infrastructure and to reduce the potential for disruption of such events affecting adjoining businesses operating in the industrial estate (albeit it is expected that such larger events would occur outside of business hours, in the evening and at weekends), the applicant is prepared to accept a planning condition limiting the number of occasions that this amalgamation can occur - to no more than 20 days in any calendar year, of which only 11 events can be on consecutive days. However given the high public transport accessibility and travel plan to be secured, officers consider that this restriction is not considered necessary.
44. The supporting Site Management & Operational Strategy sets out the event management that would be in place for different events happening with this space, as well as events taking place in the conference centre. Officers have asked for further clarification on whether local community groups have been consulted on their likely take-up of the space and whether there are certain requirements of the space they have, however little information has been submitted on this. However to ensure this space is advertised properly and used efficiently, officers have ensured that a Community Use Agreement is secured within the s106 Agreement, which will give precise details of how the space will operate, co-ordination with community groups, details of pricing, types of events etc, tying in closely with the recommendations of the Design Code as outlined above.
45. Furthermore, the proposed development accords with Local Plan Policy BHC3 which supports the development of creative workspaces, cultural facilities and other mutually complementary uses. In terms of the Staples Corner area, the proposed community uses meet the objectives of Local Plan Policy BEGA2 which recognises the need for the new Staples Corner mixed use 15-minute neighbourhood/community to be supported by new social infrastructure and multi-functional community facilities. It also would ensure delivery of some significant community floorspace early in the Masterplan period, which is a significant benefit.

Other commercial/ Class E use

46. Local Plan Policy BE4 states proposals involving 500 sqm or above gross retail or leisure floorspace, which are outside town centres and do not accord with the Local Plan, should be accompanied by an Impact Assessment. Also of relevance is London Plan Policy SD7, which states that boroughs apply the sequential test to applications for main town centre uses, requiring them to be located in town centres. If no suitable town centre sites are available or expected to become available within a reasonable period, consideration should be given to sites on the edge-of-centres that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport.
47. A ground floor café use is proposed on the corner of Oxgate Lane and Edgware Road, adjacent to the main hotel lobby/ entrance. This is supported in principle as it would provide some active frontage on this corner, and as such ties in with the objectives of the SCGA Masterplan for this location (outlined in Sub-Area 9). At approximately 120 sqm, it would be of a modest size and not require any impact assessment to be undertaken. Officers recommend a condition to ensure that the amount of Class E(a) or (b) use is limited to 120 sqm here, to ensure there are no larger retail or café uses which harm the viability of neighbouring town centres.

Urban design considerations

Policy context

48. London Plan Policy D3 sets out a design-led approach to new development that responds positively to local context and optimises the site's capacity for growth by seeking development of the most appropriate form and land use, while Policy D5 seeks inclusive design without disabling barriers. Policy D9 sets out a framework for assessing proposals involving tall buildings including their visual impact, functional impact and environmental impact. The policy requires proposals to be justified with reference to existing and proposed long range, mid-range and immediate views, to demonstrate the impact of the proposal upon the surrounding streetscape.
49. Brent's Policy BD1 seeks the highest quality of architectural and urban design, whilst Policy BD2 directs

tall buildings (defined as those of over 30m in height) towards designated Tall Building Zones (TBZ), and expects these to be of the highest architectural quality. The application site is within a TBZ and site allocation policy BEGA2A for the Staples Corner Growth Area identifies the potential for tall buildings be considered taking account of the need to respect views from Golders Hill through to Harrow on the Hill and not have a detrimental impact on the Brent Reservoir Site of Special Scientific Interest, reducing in scale towards its residential and open space edges.

50. In response to the above the SCGA Masterplan and Design Code SPD provides more detailed guidance on the acceptability of tall buildings as part of the masterplan. It highlights for Sub-Area 9: Wing Yip & Oxgate Centre that buildings of between 22-31 storeys in height would be acceptable in the west (outside the protected view corridor) stepping down to heights of 12 to 16 storeys in the east (inside the protected viewing corridor).

Height, massing and materiality

51. The proposed development includes a podium base of 4 storeys in height. This element of the scheme occupies the majority of the plot. Above the main podium is a set in podium roof terrace. On the corner of Edgware Road and Oxgate Lane, a tower element is proposed up to 22 storeys in height. The overall relationship of the tower element to the lower podium would be proportionally well balanced. The podium would respond well to the surrounding area defining clear edges to the site, as well as a clear base and body.
52. In terms of elevational treatment, the podium of the building at ground to second floor level is proposed to be enclosed by an insulated wall panel and stick curtain glazed wall system. Entrances are identified through a different material palette including the use of Portland stone, although further detail would be secured through the materials condition to ensure that they create a strong sense of arrive and are discernible from one another and relate to the respective uses that they access. The conference and community uses on the third floor are proposed to be enclosed by a decorative metal screen. The tower form is proposed to be accentuated vertically by a balance between perforated metal panels and glazing. The tower element is then proposed to be covered by an exo-skeleton façade treatment, using powder coated aluminium. The palette of materials departs from the SPD which suggests the use of brick, pre-cast concrete and other similar materials whilst the SPD also suggests that facades could incorporate industrial inspired architectural features. Nevertheless, the use of the exoskeleton creates interest in the facades and contrast the vertical metal panels and glazing that will sit behind it. Given the wide range of and nature of materials to be used, further refinement of the materials palette can be secured through the materials condition to ensure that the suite of materials works cohesively together.
53. This application was supported by a Townscape and Visual Impact Assessment (TVIA) which evaluated the potential impacts of the proposal from a number of viewpoints. While the Growth Area is a designated tall building zone with a significant amount of development identified within the adopted policies and SPD, this is the first tall building to be put forward within the growth area. As such, the proposal inevitably would result in significant effects when evaluated in both the existing context and when examining the cumulative effects (taking into account development that has already been consented in the Brent Cross Town Regeneration Area). It is noted within the TVIA that the proposed development would result in a positive contribution to the townscape character and urban fabric. The assessment concludes that the proposal, on balance, has no unacceptable townscape, landscape or visual effects and that it can be absorbed into the character and views of this part of the city. While noting the degree of change from the existing context, officers have regard to the policy designation together with the adopted SPD which promotes higher densities in this location and indicates that buildings between 22-31 storeys in height would be acceptable. Officers agree with the conclusions of the TVIA and consider that the proposal is acceptable in relation to the potential townscape impacts.

Layout and public realm

54. The ground floor of the proposal include the entrance foyer to the conference centre/community centre on Oxgate Lane with the entrances to the café, hotel foyer and industrial space on Edgware Road. Active frontages have been maximised along the Edgware Road frontage and Oxgate Lane frontages. It is however noted that the western end of the site is predominantly inactive with large elements of the southern elevation also inactive. These elevations currently face onto industrial uses rather than public realm. Nevertheless, the SCGA Masterplan and Design Code SPD includes as aspiration for a public square to the south of the application site and a North-South Spine Road to the west. However, the scheme was revised to include glazing to the southern elevation at ground floor level. Servicing takes place from Oxgate Lane.

Heritage considerations

Policy context

55. Policy HC1 of the London Plan 2021 states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process. These policies also apply to non-designated heritage assets.
56. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. Regarding listed buildings, all planning decisions should "have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses" and regarding conservation areas special attention must be paid to "the desirability of preserving or enhancing the character or appearance of that area".
57. The NPPF states that when considering the impact of the proposal on the significance of a heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting.
58. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. The NPPF goes on to say that local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

Assessment of existing building's significance

59. The site itself contains a locally listed building (a non-designated heritage asset) known as the Oxgate Admiralty Citadel. The building is not in a conservation area, and no statutory listed buildings are located in the vicinity of the site. Furthermore, the site is not within an Archaeological Priority Area (APA) or a local Site of Archaeological Importance (SAI).
60. The local listing describes the building as a 1930's art deco building above ground with upper basement and protected sub-basement and states that its historic significance is the subterranean reserve war rooms for the military and the government. The listing acknowledges that the underground spaces are known to be semi-derelict.
61. Objections have been received from the Twentieth Century Society and SAVE Britain's Heritage regarding the loss of the existing building, which they consider to be of historical significance and recognised as a Locally Listed Non-Designated Heritage Asset (NDHA) in Brent's Local List, indicating it to be one of the borough's "*important local landmarks in their own right [that] make a significant contribution to the character and appearance of their area.*" SAVE also outline that the SCGA Draft Masterplan and Design Code SPD (May 2024) states that "*opportunities for reuse, adaptation and retrofitting must be explored as a first approach to any and all development proposals*".
62. The council's principal heritage officer has reviewed the revised proposals and commented that the local list description sets out its significance with a score of 7 out of 12. The scoring system is based on approved methodology (contrary to the Heritage Statement). Having reviewed the evidence provided within the heritage statement and a revisit to the site, the council's heritage officer concludes that it is closer to score 5. Thus, it is considered of low significance.
63. The Heritage Statement (revised in October 2021) sets out the history of the building and also puts it into context with an 'overview of the building type: WWII Military Citadels'. It also sets out the significance including a Statement of Significance. The key conclusions reached within this statement are:
- In isolation, the Citadel retains limited historic value as a surviving example of the Government's early plans for the provision of central government emergency headquarters in the London suburbs
 - In the context of other contemporary bunkers specifically designed and developed as an initial

emergency structures it is ranked as medium significance

- As part of a group it retains some interest as a surviving contingency wartime administration space for the Admiralty
- It had little activity during wartime
- Architecturally the above ground structure retains no interest whilst the underground portion retains some limited interest as an example of substantially reinforced basement structure built to withstand repeated bombing.

64. The council's principal heritage officer considers the above assessment to be fair. The statement does not draw out any special interest in the construction or finish of the above ground office block, although its very utility might be seen as a significant historically. The statement also acknowledges that the reinforced basement was little used during the war with the main naval operational command remaining in Whitehall and the Admiralty Citadel (Listed Grade II). Furthermore, there are no original fittings. In contrast, the Paddock cabinet war rooms which are also in Brent were used on a number of occasions. Paddock is also more characterful and retains more fittings.

Assessment of harm and significance of heritage asset against benefits of the proposed scheme

65. The NPPF outlines that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

66. In his assessment, the council's principal heritage officer has weighed up the desirability of retaining the building, and concluded it would be advantageous to retain the two basements as this is the most significant element of the structure.

67. In terms of retaining the basements, the Heritage Statement and the Condition Report both confirm that in order to put it into a viable use [consistent with its conservation, NPPF 197a] it would be 'disproportionately expensive to create the third level of basement beneath the existing levels' and that the 'existing basement shell is beyond realistic repair with regard to providing a future sixty years of design life and creating a space that would serve its intended use.'

68. The heritage statement reinforces the view that it would be very costly to retain the structure in a new use. It concludes that 'the cost of investigation, testing and remediation for the very low grade rental value of the two basement spaces will generate a huge financial deficit.' Grant Mills Wood (commercial and industrial property agents and chartered surveyors) have also assessed options for refurbishment and letting the existing building. It advises, from a marketing perspective, even if the whole building was refurbished, that it would be very challenging to let given its age and design. They conclude that the refurbishment cost of the building is highly unlikely to be covered by sufficient rental levels. BTP Quantity Surveyors conclude that the cost of refurbishing the existing building would be £22.22m of which works to improve the basements would be circa £2.56m.

69. Full demolition, by its very nature, must be seen as harmful to the significance of the heritage asset. However, it has been established that the structure is now of limited architectural and historical interest and narrow level of intactness. Furthermore, there is the prohibitive cost of restoring it to a viable and practical use. Considering everything, although the basement structure (the most noteworthy element) would be lost, it is now of limited significance and following the submission of a more robust and comprehensive set of evidence as part of the revised information, officers' consider that it would be unrealistic to restore the basements as part of the scheme.

70. While the proposal does not affect a designated heritage asset, officers still consider it is important to balance the harm to the site's significance through its demolition with the proposed benefits of the scheme. Officers set these out in more detail in other sections of the report. However in summary the provision of replacement industrial floorspace, including affordable workspace, the proposed community space and the contribution to the wider re-development of the Staples Corner Growth Area in terms of bringing this site back into viable use and the public realm improvements being secured, are considered to be significant benefits.

71. It is also pertinent to note the GLA's comments on the heritage aspects of the scheme, with paragraph 33 of the Stage 1 comments stating that *'with regards to the loss of this non-designated heritage item, GLA officers acknowledge that given the condition of the item together, with the likely future role of the Staples*

Corner growth area, the public benefits of such a proposal could potentially outweigh any harm that would result from its loss.' Officers consider that in light of the public benefits outlined above, the GLA's comments also justify the harm resulting from the loss of the locally listed building.

72. Nevertheless, the building has distinct local and national interest (at whatever level of significance) for what it contributes to understanding of historical development of the building type: WWII Military Citadels. In line with para. 211 of the NPPF, LPAs should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence publicly accessible.
73. On this basis, the council's principal heritage officer has confirmed that there is therefore a need for the building's significance to be recorded to Historic England's recommended standards. Additionally, a condition is recommended to ensure that full details of mitigation measures, include selective salvage and a history of the building prominently displaced in the hotel lobby, are secured in consultation with the heritage officer and key heritage groups.
74. On balance, and when read in conjunction with other relevant sections of this report, the proposals would accord with paras. 209-211 of the NPPF, and policies BHC1 of the Local Plan and HC1 of the London Plan.

Layout and standard of hotel accommodation

Floorspace standards, outlook and aspect

75. The hotel use occupies the upper levels of the building from fourth to 22nd floor level, with 210 hotel rooms in total, accessed by a central lift core and two staircases. The rooms surround the lift core and are accessed via a hallway which stretches the length of the building. There are 14 rooms per floor, ranging from larger corner rooms of approximately 170-175sqm, and standard rooms being approximately 95sqm. In line with policy, a restriction on 90 day occupation would be applied to ensure that the hotel is used for visitor accommodation purposes.
76. Each room is double occupancy and every floor has access to the 'goods lift', 'passenger lift' and 'evacuation lift', with two stairwells and risers. The largest of the rooms are the accessible studios which are shown to accommodate for disabled users through the provision of turning circles present in both the room and the accessible en-suite facility. The smaller rooms have a small kitchenette and en-suite toilet and shower.
77. All rooms have windows to allow for daylight and natural ventilation, with the corner rooms being dual aspect. Each room has a double bed, with storage, a shower and toilet en-suite and a kitchenette facility. Inclusive access has been confirmed as integral to the design of the hotel. It has been confirmed that 10% of the hotel rooms would be accessible in accordance with London Plan policy E10.
78. Within the basement and accessible through the hotel lift cores, the swimming pool is proposed, ancillary to the hotel use, with a spa and associated facilities within a 'pavilion' building at fourth floor level. There are adequate changing facilities and showers included. The lowest level of basement (-3) has provision of plant rooms for the hotel use, as well as additional plant room situated within the lower basement serving the swimming pool facility.
79. The car park includes parking spaces for the hotel within the basement and is accessible through the car lift serving the ground floor hotel lobby and accessed from within the building. The allocation of car parking spaces for each use would be secured through the car park management plan. There are also long-stay cycle spaces in the basement for hotel users.

Impact on neighbouring properties

80. SPD1 provides guidance on how new development should be designed in order to minimise the impact on neighbouring properties. The guidance states that 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 a height of 2m above floor level. It goes on to state that where proposed development adjoins private amenity/garden areas then the height of the new development should normally be set below a line of 45 degrees at the garden edge measured from a height of 2m above ground level.

81. The revised drawings include long sections which demonstrate that despite the proposed increase in height to 22 storeys, there would be no breach of either 30-degree or 45-degree lines to nearby residential properties given the significant distance maintained to these and the largely commercial nature of the surrounding area currently (outlined in more detail below). It should also be noted that the site does not directly adjoin any residential properties or private amenity/garden areas.
82. The applicant has also submitted a daylight, sunlight and overshadowing analysis of the impact of the development on surrounding properties, utilising the recommendations set out in the BRE 'Site layout planning for daylight and sunlight - a guide to good practice (2022)' document. Officers are satisfied that the report successfully identifies all neighbouring properties (both within the site and immediately adjoining it) which could be affected by the proposed development, which are summarised as follows:
 83. Myrdale Lodge – 415 Edgware Road
 84. 3-7 Oxgate Lane
 85. 29-35 Humber Road

Daylight

86. For daylight, an assessment was undertaken using two tests, namely the Vertical Sky Component (VSC) and, where room layouts are known, Daylight Distribution (or No Sky Line) (NSL) in line with BRE guidelines.

Myrdale Lodge

- Myrdale Lodge is a six-storey residential block to the north-west of the application site, on Edgware Road (approximately 120m from the northern boundary of the application site). There are a number of residential windows to the rear facing elevation of this which have angled views to the proposed development.
- The report outlines that all windows serving habitable rooms could be materially affected by the scheme (i.e. those at lower ground and ground floor levels), all retain VSC levels in excess of BRE targets (the most affected window would still retain VSC levels of at least 0.94 their former value). This is reinforced by the findings of the NSL assessment, which concludes that all habitable rooms to the block would retain levels of daylight distribution in excess of BRE targets, with one room experiencing a 1% loss and one room experiencing a reduction of 6%. Given these conclusions, officers consider it reasonable that only the two lowest levels of the building have been tested.

3-7 Oxgate Lane

- 3-7 Oxgate Lane are a series of three terraced, two-storey dwellings on the south side of Oxgate Lane, which are to the south-west of the application site (approximately 205 metres away from the western boundary of the site). There are a number of front, side and rear facing windows which may be affected by the proposed development and required assessment.
87. The report outlines that in terms of VSC, there would be no reductions in excess of 20% to any of the potentially affected windows. No NSL assessment has been carried out due to the lack of any detailed drawings available, however officers consider that given the distance of these buildings to the application site, the conclusions drawn by the VSC testing are sufficient.

29-35 Humber Road

88. 29-35 Humber Road are also a series of two-storey terraced dwellings on the south side of Humber Road, to the south of the application site (approximately 205-230 metres from the southern boundary of the site). There are a number of front facing windows which may be affected by the proposed development and required assessment.
89. The report outlines that in terms of VSC, there would be no reductions in excess of 20% to any of the potentially affected windows, and therefore there would be no material loss of daylight to habitable windows of the property. Again, no NSL assessment has been undertaken due to the lack of any detailed drawings available, however officers consider that given the distance of these buildings to the application site being more than 200m away, the conclusions drawn by the VSC testing are sufficient.

90. Overall, based on the results of the daylight assessment as discussed above, the nearby residential occupants would not experience a noticeable reduction in daylight as a result of this development.

Sunlight and overshadowing

91. Paragraph 3.2.2 of the BRE Guidance stated that 'obstruction to sunlight may become an issue if:

Some part of a new development is situated within 90° of due south of a main window wall of an existing building

In the section drawn perpendicular to this existing window wall, the new development subtends an angle greater than 25° to the horizontal measured from the centre of the lowest window to a main living room.

92. The assessment of sunlight to existing buildings is undertaken using Annual Probable Sunlight Hours (APSH). This assessment calculates the percentage of statistically probable hours of sunlight received by each window in both the summer and winter months throughout the year. Paragraph 3.2.6 goes on to advise "if a room can receive more than one quarter of Annual Probable Sunlight Hours (APSH), including at least 5% of APSH in the winter months between 21 September and 21 March, then it should still receive enough sunlight. Also, if the overall annual loss of APSH is 4% or less, the loss of sunlight is small...".

Myrdale Lodge

93. The report concludes that in terms of both APSH and WPSH, there would be no reductions in excess of 0.8 of the former value to any of the potentially affected windows. A transient shadows analysis has also been undertaken as recommended by BRE Guidance when a tall building is proposed. This analysis concludes that there would be some shadow on the south elevation of Myrdale Lodge between 7-9am on 21st March, however this would be marginal and no adverse effect would occur.

3-7 Oxgate Lane

94. The report concludes that in terms of both APSH and WPSH, there would be no reductions in excess of 0.8 of the former value to any of the potentially affected windows.

29-35 Humber Road

95. The report concludes that in terms of both APSH and WPSH, there would be no reductions in excess of 0.8 of the former value to any of the potentially affected windows.

Staples Corner Masterplan context

96. The proposed SCGA Masterplan indicates that a maximum of 31 storeys could be appropriate in this location, while at the same time there is expected to be a degree of residential co-location in the area in future years as a result of the Masterplan. Notwithstanding what has been stated above about the scheme's compliance with the BRE guidance based on the existing scenario, the guidance is largely based around a more low density, suburban context and does also allow for flexibility where change is expected to occur and the existing baseline conditions cannot realistically be maintained.

97. The site is in a Growth Area location where higher densities are likely to be achieved, and any new residential development coming forward around this site would need to be assessed in this context. Therefore, while officers acknowledge that while the existing scenario is likely to worsen from a daylight and sunlight perspective, the wider objectives of the Masterplan would need to be taken into account, and BRE guidance clearly acknowledges this.

Overlooking and privacy

98. SPD1 states 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. A distance of 9m should be kept between gardens and habitable rooms or balconies. Reduced distances between new frontages may be acceptable subject to consideration of overlooking and privacy as well as high quality design and solutions which can sometimes mitigate impacts and allow for efficient use of land.

99. Existing adjacent properties are non-residential. However, the expectation is that mixed use development will come forward in due course and any scheme must therefore relate well to the adjoining sites and not prejudice the redevelopment of those sites.
100. The lower floors of the proposed development are situated in close proximity to the western and southern site boundaries, with the first and second floor of the podium projected to adjacent to the western boundary and between 3.5 and 4 m from the southern boundary. The masterplan envisages the provision of a new road to the west of the site. This was envisaged within the adjoining site and is not proposed to be delivered within this application. While it therefore cannot be relied upon for this scheme, it is noted that the podium uses will comprise industrial and community/conferencing uses which do not rely on outlook. The conferencing rooms are proposed to be clad in decorative metal panels, thus preventing significant overlooking but still allowing light into the facility. Within the southern façade, opaque glazed curtain walling is proposed for many of the windows of the industrial units, whilst the windows closer to Edgware Road are proposed to be clear glazed to balance the benefits of natural surveillance with potential privacy impacts for future development sites. It is also noted that the masterplan identifies land immediately to the south of this site for the provision of a new open space. The hotel elements of the scheme are situated within the tower, which is focused toward the junction of Oxgate Lane and Edgware Road, thus not resulting in future privacy issues for surrounding sites. As such, it is considered that the potential impacts to the privacy of adjoining development sites have been mitigated through the design of the building.

Transport and highways

Policy background

101. 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.
102. 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.
103. 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.

Car Parking

104. With the opening of the new Brent Cross West railway station, serving eight trains per hour in each direction, the site now has a PTAL rating of 4. Compared to the situation when the application was first submitted in early 2021, this makes the site much more appropriate for a large-scale hotel and conferencing development in spatial planning terms, with the location having become much less reliant on car travel for access.
105. However, the level of car parking would consequently be expected to fall to reflect this, and the adoption of the Local Plan means that car parking standards now align with London Plan standards for the employment uses. Separate standards apply for the hotel, community and conference facilities.
106. Table 10.4 of the London Plan restricts the maximum parking for office floorspace to one space per 100m², but with a further reduction applied to industrial/warehouse uses to reflect the lower employment density, as per the HCA Employment Density Guidance 3rd Edition. With typical employment densities of one employee per 34m² – 55m² for industrial and light-industrial uses respectively, this would equate to between 87-142 staff for the amount of employment floorspace proposed.
107. With the aim of the parking standards being to keep car use to the London Mayor's target of 80% travel by non-car modes, applying a 20% car mode share to the higher staffing total of 142 staff would give a parking figure of about 28 spaces (~ one space per 175m²). Parking standards for the hotel and community/conference facilities are set out in Appendix 4 of the Brent's Local Plan and state that parking in areas with a high PTAL rating should be limited to operational and disabled parking only, unless otherwise justified by a Transport Assessment.

108. The revised scheme shows a reduction in parking from the original 76 spaces to 36 spaces (incl. 5 disabled). London Plan and local standards suggest that 'car free' should be the starting point in assessing parking provision but allow operational parking for hotel and conferencing uses and target 80 % of travel by non-car modes for industrial uses. The applicant's revised Transport Assessment set out some further justification for the amount of parking proposed, supported by an outline Parking Management Plan. While officers do not necessarily agree with all of the applicant's arguments for an increased level of parking, having regard to the nature of uses in the scheme, the floorspace for each use and the anticipated employment yield, it is considered that the proposed provision of 36 spaces overall accords with adopted policies for the provision of car parking. A detailed Parking Management Plan would be secured, to be submitted prior to first use of any part of the development, to ensure parking arrangements for the various hotel, workspace and other commercial elements operate efficiently and do not unduly impact the local highway network.
109. The basement car park access is accessed via a two-way ramp to a 10% gradient from Oxgate Lane down to the upper basement level and a single-width ramp between the upper and lower basement levels. A means of traffic-light control will be required for the lower basement access ramp if approved. It is confirmed that a headroom of at least 2.6m will be maintained throughout for small vans and high-top conversion vehicles for wheelchair users.
110. The inclusion of 24 electric vehicle charging spaces is considered acceptable, provided the remainder have passive provision), whilst the inclusion of 5 wide disabled spaces (14% of the total) is welcomed. A condition ensuring these amounts are secured is attached to the draft decision letter.

Cycle Parking

111. With the revised floor areas, the amount of bicycle parking required for the various uses totals a minimum of 38 long-stay and 32 short-stay spaces. The amended drawings show 55 long-stay spaces on in two stores within the basement car park, along with showering, changing and locker facilities, which more than meets requirements.
112. Access is via suitably sized lifts from the hotel/community reception area and from the industrial entrance area.
113. In terms of short-stay parking, only 24 spaces are indicated on the plans though, set on 'Sheffield' stands around the perimeter of the building. A further four stands will be required to meet standards, and officers are satisfied that these can be secured via condition.

Delivery and Servicing

114. The proposed servicing arrangements involve an undercroft servicing area for two 12m rigid lorries and a transit-sized van, plus a turntable to enable delivery vehicles to access and egress in a forward gear. As before, the turntable is only 12.56m in diameter, so would not enable articulated lorries, whilst large rigid lorries would also have to position themselves very accurately on the turntable if they are not to strike the building as the table turns.
115. However, the Transport Assessment confirms that the type of industrial floorspace being provided would not be attractive to large industrial businesses that might require servicing by articulated lorries and this will be communicated to potential occupiers through their lease arrangements so that they are aware of the limitations on deliveries before moving to the building. This is fine in principle and a planning condition restricting the type of occupier of the industrial floorspace is attached, ensuring that no individual unit would be more than 1,000sqm.
116. A Framework Delivery and Servicing Plan has also been submitted to help to manage the use of the service yard. Amongst the measures set out include the operation of a delivery booking system, rescheduling of deliveries outside of peak hours and use of a centralised ordering system to consolidate loads and minimise the number of suppliers and delivery movements. Delivery activity will then be monitored. This is welcomed and is recommended to be secured by condition.

Coach Parking

117. The proposed hotel also requires at least two coach parking spaces. As before, a lay-by for coaches to

set down and collect passengers is proposed along Oxgate Lane and this has now been lengthened to 25m for two 12m coaches. As previously mentioned, any waiting restriction controls in the lay-by will be at the discretion of Brent Council. Some allowance for taxi parking would also be appropriate and the restrictions will be agreed as part of the S278 works to construct the lay-by.

118. The proposed highway works will also need to include the adoption through a S38 Agreement of extra footway space behind the lay-by to maintain pedestrian access along Oxgate Lane, as well as extra footway space at the corner of Oxgate Lane and Edgware Road.
119. Transport for London (TfL) have raised concerns that standing coaches could obstruct visibility splays for vehicles leaving this site and the adjoining premises. However, a visibility splay of 2.4m x 25m is shown to be retained from the car park exit, which is appropriate for this 20mph street. An extension of the kerblineline further westwards is also still considered beneficial, as it would increase footway space.
120. The proposal would result in the loss of existing on-street parking spaces to accommodate the lay-by, with a lack of parking survey data to show how well used they are. However, it is noted that the proposal has received very few objections, so this does provide some comfort that public objections are unlikely when it comes to advertising the Traffic Regulation Order.
121. It should also be noted that the lay-by does not correspond with the aspirational street layout for Oxgate Lane drawn up through the Staples Corner Growth Area Design Code, which sets out an arrangement where the buildings are set back with a 7.5m wide carriageway, 3m wide cycleway and widened footways and planting strips, with no on-street parking. In particular, the coach lay-by will significantly reduce the available space within the carriageway for a potential cycle lane along this length of Oxgate Lane, which was envisaged on the opposite side of the road. A greater set-back will be required on the opposite (northern) side of Oxgate Lane in order to ensure the delivery of the cycle lane. This is considered to be reasonable given the considerably greater depth of those sites and associated increased ability to deliver the additional land to provide this infrastructure. This scheme would still secure highway works to widen and resurface the footways of Edgware Road and Oxgate Lane fronting the site, and provide bicycle stands and street trees. This in turn would improve the pedestrian environment surrounding the site, in line with the aspirations of the SCGA Masterplan and Design Code SPD.

Site Management

122. Given that the above issues regarding parking and servicing require a large degree of site management, a Site Management and Operation Strategy has been submitted, which addresses a number of issues including non-transport matters such as opening hours, use of areas of floorspace and terraces, noise impacts etc. Measures are also replicated in the Car Park Management Strategy, Delivery & Servicing Plan and Travel Plan.
123. In terms of car parking, Automated Number Plate Recognition will be used to restrict access to pre-authorised vehicles only, with use of the parking spaces being regularly monitored. For the service yard, a service yard co-ordination team will operate a booking system of time slots for access to the service yard, with arriving vehicles needing to provide 15 minutes' notice to ensure access to the yard is available when they arrive. The strategy will also oversee the management of any large events within the community/ conference floorspace to ensure travel arrangements for such events are clearly communicated to visitors, particularly around use of Brent Cross West station.
124. As outlined above, the parking management plan would be secured by condition, as would the Delivery and Servicing Plan (DSP). Travel Plans for each element of the proposed uses would be secured via section 106 agreement.

Trip Generation

125. The revised Transport Assessment includes a reassessment of previous trip rate assumptions, partly to reflect the alterations to the relative floor areas (such as the increased industrial space) and partly as a sense-check to the original assumptions, including adjustments to reflect the lower level of proposed car parking compared with some of the comparison sites used previously.
126. The revised vehicular trip generation estimates are 23 arrivals/29 departures in the morning peak hour (8-9am) and 30 arrivals/49 departures in the pm peak hour (5-6pm). These flows are not considered to be significant enough in the context of existing flows in the area to require any further assessment of junction capacity, particularly as the junction that would experience the greatest impact would be Oxgate

Lane/Edgware Road, which is a simple left-in/left-out priority junction anyway.

127. The applicant also points out that the former use of the site would have historically generated a certain amount of traffic anyway, although limited weight should be given to this is debatable given the poor condition of the building and the fact it has been vacant for a decade. However, the vehicular trip rates do need to be reconciled against the assumptions in the Staples Corner Growth Area Masterplan, in order to ensure the volume of traffic generated is consistent with the expectations of the Masterplan.
128. In this regard, it is noted that the peak hour vehicular trip rates for the workspace are considerably higher than the rates used in the Masterplan. This gives rise to concern over the cumulative impact on the redevelopment of the area if this development sets the benchmark and suggests that car parking is not being sufficiently constrained to deliver the low traffic aspirations for the area. The vehicular trip generation assumptions therefore highlight the importance of ensuring that car parking provision is suitably constrained and compliant with maximum parking standards. In this regard, a suitable financial contribution towards the introduction of a CPZ (suggested at £50,000) in the adjoining area is advised to ensure that the development does not simply lead to on-street parking problems. Officers recommend that this is secured as part of the Section 106 agreement.
129. With regard to overall trip numbers, the revised assessment estimates total person trips during the peak hours to be 66 arrivals/146 departures in the morning peak hour and 122 arrivals/133 departures in the evening peak hour. These have then been broken down by mode in accordance with Census data for the nearby Mapesbury ward (rather than for the immediate Dollis Hill ward), on the basis that the Brent Cross West Thameslink station is expected to have altered modal choice. This is accepted as being a reasonable assumption, with the caveat that the uplift in rail trips would be experienced on Thameslink train services, rather than on Underground services.
130. Transport for London (TfL) have confirmed that they have no concerns with the impact on local rail or tube services during the peak hours. However, they have requested a sum of £162,500 towards bus service enhancements in the area. Further consideration has also been given to changes in trip rates across the course of the whole day, rather than just peak hours, to reflect the move away from a purely employment use on the site to include the hotel, conference and community facilities, particularly bearing in mind that the conference/community space has a potential combined capacity for 2,000 guests. The assessment of daily trips suggests that the development will generate an estimated total of 2,725 trips by all modes of transport across the course of a day. This is approximately three times the estimated number of daily trips for the existing building, if brought back into use.
131. It is accepted by the applicant that the hotel use will generate more weekend trips than the former employment use of the site. However, given that weekday trips for the building as a whole are still likely to exceed Saturday trips (unless a particularly major event, such as a wedding, is held), the omission of any Saturday assessment is considered acceptable in this case.
132. Whilst the impact on the highway and public transport networks are most keenly felt during weekday peak hours and has been addressed above, the predicted tripling of daily trips by foot and bicycle does require the safety of walking and cycling routes to the site to be given much greater attention.
133. The original Transport Assessment included a Healthy Streets Audit for the area and did identify potential improvements over five key routes to the site, including to the bus stops on Edgware Road to the north and south, the route to Geron Way and the forthcoming Brent Cross West station and routes along Oxgate Lane. Areas for improvement included the route along Oxgate Lane to Oxgate Court Parade, which was identified as having a poor pedestrian environment with a lack of dropped kerbs and tactile paving at junctions and numerous accesses.
134. However, significant changes to this area are now proposed through the SCGA Masterplan, whereby each site will be expected to deliver improvements along their own frontage. Therefore it is not now considered sensible to secure improvements to this route at this particular time, as wider redevelopment may result in the improvements being removed and replanned anyway.
135. Instead, proposals for the provision of a pedestrian crossing on Edgware Road in the vicinity of Oxgate Lane to improve access to Brent Cross West station are being developed and this would be a significant benefit to this site too. Given the complexity of the design, requiring a two-stage crossing with the removal of the central reservation and railings in order to accommodate a pedestrian island, the works are expected to be costly. A financial contribution of £250,000 is sought towards the provision of the crossing.

136. Landscaping improvements are also proposed around the site, including new planting and seating, which is welcomed. As mentioned above, this should also include widening of the highways along the Edgware Road and Oxgate Lane boundaries and resurfacing of the footways and needs to be delivered through a S38/S278 Agreement.

137. Transport for London have also recommended the provision of a shelter at the southbound bus stops to the south of the site and the provision of Legible London wayfinding signage and the applicant has agreed to fund these measures via section 106 agreement.

Travel Plan

138. An updated Framework Travel Plan has been provided with the revised proposals, which sets out a greater range of potential measures, including promotion of car sharing amongst staff, interest-free loans for public transport season ticket and bicycle purchase and general provision of information through welcome packs for staff and website information.

139. However, no mention is made of car park management as a Travel Plan tool, such as offering priority parking to car sharers or charging for car parking to subsidise other measures. The overarching target is to achieve a 10% reduction in the number of car trips to the site, although this needs to be broken down into three- and five-year targets. The targets also need to be consistent with the London Mayor's target of 80% of trips being by sustainable transport. The targets will be reviewed and firmed up following the undertaking of initial baseline surveys to be undertaken within three months of occupation.

140. It is then proposed to undertake yearly monitoring of the Travel Plan for five years, although precise details of the monitoring standard are absent at this stage. As such, whilst the proposed Travel Plan is an improvement on the previous submission, it will require further development before it can be approved. Officers therefore recommend this is secured via section 106 agreement, which will also ensure yearly monitoring takes place.

Construction Management

141. To minimise construction impacts, a Framework Construction Logistics Plan (CLP) has been submitted. This will need to be built into a full document once a principle contractor is appointed. In the meantime, this anticipates building works extending from early 2025 until late 2027, with standard working hours of 8am-6pm on weekdays and 8am-1pm on Saturdays.

142. Due to the limited size of the site, a remote site compound is proposed on Coles Green Road (easily accessed from North Circular Road), from where stored goods can be brought to site on a 'just-in-time' basis. This is welcomed and will minimise any disruption to traffic flow around the site. The site itself will be accessed directly from Oxgate Lane, which is also welcomed. Deliveries will be pre-booked, with larger vehicles scheduled to arrive outside of network peak hours.

143. Wheel washing facilities will be provided and as on-site parking will be limited, staff will be encouraged to use public transport to access the site. The framework plan forms a good basis from which to develop a full plan and a condition is sought to require the approval of a full CLP prior to works commencing.

Transportation summary

144. The main concerns with the proposals as originally submitted, i.e. the amount of car parking and the quality and layout of coach parking, have now been addressed subject to appropriate conditions. There currently is no CPZ in the nearby streets, but a payment towards the review and implementation of CPZ in a local street would be secured via section 106 agreement. Cycle parking has been proposed to meet London Plan standards.

145. The revised plans and highway works on Oxgate Lane ensure that the long-term strategic objective of a new cycle lane along Oxgate Lane are not compromised, and further contributions towards public realm and highways improvements to improve links to Brent Cross West Station in the future have been secured. Servicing provision within the site is considered to be sufficient to meet projected demand, whilst the initial construction management plan and construction logistics plans are considered to be

acceptable in principle subject to final approval via condition. Contributions are also sought by TfL towards station improvements, cycle routes and bus services. The proposal is considered to be acceptable on balance in relation to the potential transportation impacts subject to the conditions and obligations set out within the recommendation section of this report.

Sustainability and energy

Policy background

146. 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.
147. Major residential and non-residential developments are expected to achieve zero carbon standards, including a 35% reduction on Building Regulations 2013 Target Emission Rates (TER) achieved on site, in accordance with London Plan Policy SI2. Since the submission of the planning application, the Building Regulations have been updated with 2022 version. Nevertheless, given that the application was submitted prior to the updated regulations coming into effect, and designed in accordance with 2013 regulations, transitional arrangements are applicable and it is considered appropriate to consider the carbon reductions in accordance with the Building Regulations 2013 Target Emission Rates (not those updated and effective from June 2022).
148. 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.
149. 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. Policy BSU11 also requires any proposal for commercial floorspace of over 1,000 sqm to demonstrate that it achieves BREEAM Excellent standards.

Carbon emissions

150. 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 the 'be lean' and 'be clean' stage of this proposal, significant improvement have been made to the fabric of the development in comparison to the part L minimum values. This includes external glazing, rooflights, ground contact floor and personal doors. The MEP solutions include a DHW by ASHP as this is the main energy demand and this will be suitable for a future district heating connection. Water loop systems have been utilised for the hotel and VRF systems within the industrial areas. The water loop systems will allow for future connection to the heat network.
151. 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 incorporate air source heat pumps (ASHPs) to supply space heating and hot water together with Photovoltaic Panels (PVs) to allow a total reduction of 5% through the current GLA methodology.
152. The assessment demonstrates that the scheme would deliver a 5% reduction in carbon emissions across the development below the 2021 Building Regulations baseline, which is broken down into the following elements below:

Non-domestic

	Regulated emissions CO2 p.a	Saving in regulated emissions CO2 p.a	% reduction
Baseline Building Emissions based on Part L 2013	202.6	n/a	n/a
Building Emissions following 'Be	197.2	5.4	3%

Lean' measures			
Building Emissions following 'Be Clean' measures	197.2	0	0%
Building Emissions following 'Be Green' measures	193.3	3.8	2%
Total		9.2	5%

153. It should be noted that if based on the earlier 2013 version of the Building Regulations, the overall saving in carbon emissions would have been a 77% improvement.
154. In respect of the 'Be Lean' savings, the non-residential component of the scheme falls short of the 15% minimum savings sought for this element, but given the overall savings significantly exceeding the 35% target, the limited conflict with policy SI2, is accepted on balance. 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 within the s106 agreement with the need to pay any contribution should the scheme not achieve zero carbon, which at this stage is anticipated to be around £550,992
155. 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 the s106 Agreement.
156. 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 or clarifications relating to the Be Lean target for the non-residential element, overheating, photovoltaics (demonstrate that delivery is being maximised), futureproofing, air source heat pumps and on-site heat network are required. This would be provided ahead of the stage 2 referral.
157. 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 the Section 106 agreement, as well as carbon off-set contribution. Connection or future connection to a district heating network is also to be secured via condition.

Sustainable design and construction

158. A number of the applicant's submission documents outline sustainability benefits which would be incorporated into the scheme. Brent's BSUI1 policy require all major non-residential development (i.e. non-residential floor space in excess of 1,000sqm) to achieve a BREEAM standard of 'Excellent'.
159. An Energy and Sustainability Report was submitted with the application. The proposal includes the use of aerothermal heat pumps for both hotel and B Class areas, contributing to overall energy and carbon savings. These heat pumps are efficient at part load and are preferred over ground source heat pumps due to limited urban space. A water loop system will be implemented in the hotel areas to facilitate heating and cooling exchanges, with provisions for future district heating connections.
160. An air-to-water heat pump will also provide 100% of the domestic hot water load, further reducing energy demand. Combined Heat and Power (CHP) units, which generate both electricity and useful heat, could offset domestic hot water demand in hotels, but a specific unit has not been defined due to upcoming regulatory changes that may affect carbon reduction benefits. A total of 45 kWp of solar photovoltaic (PV) panels is proposed, with a canopy on the southwestern façade to support the PV array while providing shading.
161. The Energy Statement achieved a 5% reduction in carbon emissions for the overall development, exceeding Part L targets through improved U-values, multi-split VRF technology for heating and cooling, low energy lighting, and air-to-water technology for domestic hot water. The development aligns with local planning policies, providing a healthy indoor environment while demonstrating a 5% improvement over

the baseline energy performance.

162. In addition, the application has been accompanied by a BREEAM Pre-Assessment which identifies that the proposed new build would achieve BREEAM rating of Excellent. Officers recommend that a condition is attached ensuring post-construction checks are undertaken to secure the excellent rating.

Whole Life Carbon Cycle and Circular Economy

163. 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.

164. A Circular Economy (CE) statement has been submitted, as required by London Plan policy SI7. This is to be reviewed by the GLA as part of the stage 2 referral. Suitable planning conditions (where relevant) relating to the WLC and CE Statement will be incorporated following consideration of GLA feedback at the Stage 2 referral stage.

Overheating

165. London Plan Policy SI 4 states that major development proposals should demonstrate through an energy strategy how they will reduce the potential for overheating and reliance on air conditioning systems in accordance with a cooling hierarchy. The energy statement submitted with the application outlines the measures to be taken to meet the requirements of the policy to address overheating, and ensuring that there is no over-reliance on mechanical ventilation.

Ecology and biodiversity

166. London Plan policy G6 sets out that SNICs should be protected, and development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This policy position is also reinforced in the Local Plan with policy BGI1 setting out that all development should achieve a net gain in biodiversity and avoid any detrimental impact on the geodiversity of an area. The site does not lie within a Site of Nature Conservation Importance (SNIC) but is located approximately 0.54km south-east of the Brent Reservoir Site of Special Scientific Interest (SSSI) and the Brent Reservoir/Welsh Harp LNR.
167. An Ecological Impact Assessment has been submitted, which comprised a desk study, Field Survey, Baseline Ecological Conditions and assessment of ecological effects and mitigations. This report is based on a field survey and desktop study conducted in June 2024.
168. The report indicated the development will not directly impact designated sites due to its distance and urban surroundings, but the increased skyline may pose a risk to birds from the Brent Reservoir SSSI and LNR. Bird-friendly glass with visual markers will be used to prevent collisions. The retention of existing trees and new planting will enhance habitat quality, providing a net gain in biodiversity.
169. No impacts on bats are expected, but 12 bat boxes will be installed as an enhancement, and these will be secured as part of a wider ecological management condition. Demolition could affect nesting birds, so works will either avoid the breeding season or be monitored by an ecologist. Sixteen swift nest boxes will also be incorporated. Overall, no significant residual or cumulative effects are anticipated subject to these mitigation methods being adopted.
170. This site has suitability for breeding birds, and while adverse impacts on this ecological feature were identified, appropriate mitigation measures have been proposed. Post-development, no residual or cumulative impacts are anticipated. Enhancements such as additional planting, installation of bat roosting, and bird nesting features would result in a net gain for biodiversity, thereby according with Policy BGI1 and BGI2 of the Local Plan, Policy G6 of the London Plan, and the NPPF. Such details are recommended to be conditioned.
171. Natural England were consulted on the likely ecological impacts of the proposed development. Initially, Natural England expressed concern over potential significant effects on the Brent Reservoir SSSI. Following the submission of revised documents, Natural England raised no objection, provided that

appropriate mitigation measures are secured. Specifically, they highlighted the potential impact on bird flightlines due to changes in the skyline and recommended the use of bird-friendly glass solutions, as outlined in the Ecological Impact Assessment (EclA). It is advised that these mitigation measures be secured through a planning condition to ensure the protection of the SSSI's interest features.

Urban Greening Factor

172. London Plan Policies G1 and G5 emphasise the importance of urban greening in development. Acceptable urban greening features include street trees, green roofs, rain gardens and hedgerows. Policy G5 recommends that a target Urban Greening Factor (UGF) score of 0.3 and should be achieved on predominantly commercial developments. Brent Local Plan Policy BGI1 states that in meeting the urban greening factor, major developments should place emphasis on solutions that support biodiversity.
173. The greening strategy proposed for the development includes features such as semi-natural vegetation, intensive green roofs, tree planting and open water, resulting in an urban greening factor (UGF) uplift of 480sqm within the site. The urban greening factor score itself has not been confirmed but given that the existing site predominantly consists of hard standing there is the opportunity to enhance the urban greening factor with further details to be secured by condition in line with policy G5 of London Plan.

Trees and Landscaping

174. Policy BGI2 states that development with either existing trees on site or adjoining it that could affect trees will require a submission of a BS5837 or equivalent tree survey detailing all trees that are on, or adjoining the development site.
175. An Arboricultural Impact Assessment and a Landscape Management & maintenance Plan have been submitted, identifying seven street trees (T1-T7) along Edgware Road and Oxgate Lane. All 7 trees have been identified by Category B trees (moderate amenity value), 3 have been assessed as category C (low amenity value) and 1 as category U (dead/dying). With the exception of tree T1 and tree T2 on the Edgware Road frontage (both Whitebeam) all other individual trees would need to be removed to accommodate the development.
176. The scheme would include the planting of 60 new trees within the site (in the various roof terraces) and along the street frontages both on Oxgate Lane and Edgware Road (this would account for a net increase in 55 trees within the site).
177. The indicative location of the proposed trees is considered to add value both in terms of biodiversity and visual amenity for occupiers within the site as well as the sites overall appearance.
178. A condition is recommended in relation to tree protection measures for the two trees that would be retained on site together with a condition that requires final detailed landscaping drawings to be submitted and approved by the LPA, which will include full details of type and species of tree planting throughout the site. The highway works within the Section 106 Agreement would also secure the provision of the street tree planting as part of the wider highway works.

Environmental Health considerations

Air Quality

179. The site is located within a Growth Area and it is within an Air Quality Focus Area. London Plan Policy S11 requires major developments to be supported by an air quality assessment and to demonstrate 'air quality neutral' impacts. 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. In addition, policy BSUI2 of Brent's Local Plan 2019-2041 sets out the requirements for Major developments within Growth Areas and Air Quality Focus Areas to be required to be Air Quality Positive and elsewhere Air Quality Neutral. Where on site delivery of these standards cannot be met, off-site mitigation measures will be required.
180. The application is supported by an air quality assessment and air quality neutral and positive assessment dated August 2024. It concludes that pollutant concentrations at the façades of proposed receptors are predicted to be within the relevant health-based air quality objectives. On that basis, future occupants of the proposed development are unlikely to be exposed to unacceptable air quality and the

site is deemed suitable for its proposed future use in this respect, without the need for mitigation measures.

181. In addition, the application has been accompanied by an Air Quality Neutral and Positive Assessment (Sections 5 and 6 of the Air quality assessment). This highlights that the proposed development transport emissions for the development overall are just below the Transport Emission Benchmark for the range of uses proposed. It should be noted that the number of car parking spaces within the site has also reduced further since this report was produced. The scheme would also be air quality neutral in terms of building emissions. The results therefore show that overall, no further mitigation measures are required. In terms of air quality positive, the report concludes that there are sufficient measures proposed including the use of green infrastructure, reduction in glazing and heat recovery system as part of the ventilation strategy. The scheme would also promote sustainable modes of transport through cycle parking, a travel plan and car park management strategy.
182. The report concludes that there will be no adverse impact on air quality and it complies with the policy SI1 of the London Plan and policy BSUI2 of Brent's Local Plan. Officers in Environmental Health have reviewed the air quality information and raised no objections in terms of air quality.

Construction Noise and nuisance

183. As noted above, the development is within an Air Quality Focus Area and located close to other commercial premises. Demolition and construction therefore have the potential to contribute to background air pollution levels and cause nuisance to neighbours.
184. It should be noted that in relation to these matters, there is also control through Environmental Health Legislation and planning cannot duplicate any controls that are available under other legislation. However, the council's regulatory services team have recommended a condition requiring a CMS to be submitted for approval before works start. This will need to include management of dust through wheel washing and other mitigation measures such as noise restrictions.
185. 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

186. This site has been identified as previously contaminated, and the applicant has submitted a Phase 1 desk study by CGL dated December 2020. This study concludes that the potential risks to human health are generally considered to be low to moderate. However, the report recommends a full land contamination assessment to verify the result. It is therefore recommended that conditions are secured in relation to a site investigation, remediation and verification. The quality of the imported soil must be verified by means of in-situ sampling and analysis. Soil quality certificates from the soil supplier as proof is unacceptable.

Noise

187. The application has been accompanied by a Noise Impact Assessment prepared by Anderson Acoustics dated August 2024. This includes details of the assessment methodology; the baseline conditions at the site and surroundings; the likely environmental noise and vibration effects; and the mitigation measures required to reduce and minimise any adverse effects.
188. The report is concerned with the impact of existing sources of noise that would affect the proposed hotel bedrooms, and also the noise from any plant associated with the development affecting existing residential receptors, for which noise emission limits have been determined at this stage. The sound levels in the outdoor amenity spaces have also been considered. This has indicated that levels will be no more than the standard limit of 55 dB. In terms of building services plant associated with the development, noise emission limits have been proposed. With the limits adhered to, it is considered that the development would be compliant with National and Local policy. Whilst, with the provision of suitable specifications of glazing and passive means of ventilation where relevant, the adopted internal noise targets would be met and suitable internal sound levels for the future occupants achieved.
189. The information has been reviewed by Environmental Health who have advised that the submitted assessment demonstrates that the noise levels within the hotel rooms will be acceptable, however, plant noise cannot be fully assessed at this time as the plant information is not available. Therefore, a condition

is recommended to be attached requiring a submission of an assessment of the expected noise levels for any installed plant to protect acceptable local noise levels

Lighting

190. A condition is recommended to be attached requiring that a lighting strategy to any forthcoming scheme that considers lighting levels within the site, details of luminance levels at the nearest residential windows and any overspill lighting onto the nearby properties.

Flood Risk and Drainage

Policy background

191. 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

192. 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.

193. The policy goes on to 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.

Assessment of flood risk

194. The site is located within Flood Zone 1 and is therefore classified as being at a low fluvial and tidal flood risk. No significant risks have been identified from any of the other sources assessed. However, Oxgate Lane and Edgware Road are at 'medium' and 'high risk' of surface water flooding. Therefore, the site is considered to be sequentially preferable for development and passes the Sequential Test and is acceptable.

Sustainable Drainage Measures

195. 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. 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.

196. The Sustainable Drainage Assessment indicates that required storage volume for surface water drainage has been sized to store the 1 in 100 annual probability storm events including a 40% increase in rainfall intensity in order to allow for climate change in accordance with current standards.
197. Confirmation has been provided surface and foul water would be dealt with separately, and that the sustainable drainage measures would be managed and maintained for the lifetime of the development by an appropriate managing body. 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.
198. The LLFA is satisfied with the findings of the drainage report. It is noted that the GLA have requested further information on the drainage strategy to ensure that it achieves run off rates as close to greenfield rates as possible, including information on whether rainwater harvesting and reuse could be applied. This would be addressed ahead of stage 2 referral.
199. It notes that achieving Greenfield runoff rates for the development could not be achieved due to insufficient space on site to install attenuation systems to the required volume. It has however been agreed with the LLFA to restrict run off rates from the site to 19 l/s. which is a significant improvement on existing discharge rate of 109 l/s for a 1 in 100 year-year storm event. A vortex flow control will be installed to restrict flows to the maximum discharge rate set for the 1 in 100-year storm, plus an allowance of 40% for climate change. This proposal will ensure that the development does not lead to an increase of flood risk elsewhere through a significant reduction in discharge rates compared to the existing scenario. The proposed rate of 19 l/s will apply to all storm events. Despite not meeting Greenfield runoff rates, this betterment is a vast improvement.
200. Attenuation storage will be provided below ground to contain rainfall events up to 1 in 100-year return period (including a climate change allowance of 40%), prior to discharging to the River Brent. There is a need to provide 106 m³ of attenuation storage. The attenuation storage required is to be provided by the combined use of permeable paving and geo-cellular flood crates. Further superficial attenuation will be provided through green roofs and soft landscaped areas.
201. Thames Water was consulted and confirmed that they have no objection to the proposed development with regard to foul water, surface water, and water network infrastructure capacity. However, due to the site's proximity to a strategic sewer, they request a Piling Method Statement to ensure piling activities do not damage underground sewerage infrastructure. Thames Water also recommends installing a positive pumped device to protect the property from sewage flooding during storm conditions. If the development includes discharging groundwater to the public sewer, a Groundwater Risk Management Permit will be required. Additionally, the developer should design the water supply system to account for a minimum pressure of 10m head and a flow rate of 9 litres per minute.

Fire Safety

202. Policy D12 of the London Plan states that major applications should be accompanied by a Fire Statement, prepared by a suitably qualified third party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.
203. 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.
204. A Fire Statement has been prepared by a suitably qualified third-party assessor and has been submitted in support of the application. This statement was updated to reflect recent scheme design changes. The means of escape from all levels will be via a minimum of two escape stairs, with the first and second floors being served by a total of four escape stairs, reducing down to three from the fourth floor. The statement addresses the requirements of Policy D12 and D5 including the features to minimise

the risk of fire spread, an evacuation strategy and suitable means of escape for all building users, access and equipment for firefighting personnel.

205. London Fire Brigade was consulted on the proposed development and initially provided feedback advising the applicant to ensure that the plans conform to Part B of the Approved Document of the Building Regulations. Additionally, the applicant was directed to review Guidance Note 29 on Fire Brigade Access, with particular attention to paragraph 16, regarding water mains and hydrants.
206. On the basis of the above, the submitted Fire Statement and fire safety design are suitable to meet the requirements of D12.

Wind microclimate

207. Policy D8 requires amongst other considerations that development proposals should ensure that appropriate shade, shelter, seating and, where possible, areas of direct sunlight are provided, with other microclimatic considerations, including temperature and wind, taken into account in order to encourage people to spend time in a place. It goes on to say within policy D9 that wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building.
208. To support the above requirements, a Wind Microclimate CFD Study (ref: WH246-01F02(REV1)) has been provided by the applicant to assess the effect of the proposed development on the wind conditions in and around the site.
209. The assessment was undertaken through Computational Wind Engineering (CWE), which uses Computational Fluid Dynamic (CFD) techniques to model a 'virtual wind tunnel' and simulate conditions around the site. The wind assessment considered the effect of the existing site with existing surrounds, the proposed site with existing surrounds and the proposed site with existing surrounds and mitigations.
210. The result of the study divides into two parts: winter comfort contours and summer comfort contours. The study suggests that wind conditions in the surrounds and on the ground level are safe. On the elevated levels, the wind conditions are suitable for the intended use in most areas. However, there are small areas where the wind conditions are unsuitable for the intended use including the small isolated area on the 4th floor terrace.
211. The study also concludes that on the ground levels, the wind conditions are suitable for the intended use in most areas. Nonetheless, there are minor areas where the wind conditions are unsuitable for the intended use, including:
- Small isolated areas at the northern corner of the development
 - Small isolated areas at the eastern corner of the development
 - Small isolated areas at the southern corner of the development
 - Off-site entrance along Oxgate Lane
 - Thoroughfares along Oxgate Lane
212. However, it is noted that the model used in this analysis does not include the decorative exoskeleton of the proposed development. Additionally, some landscaping elements on the 4th floor terrace and along Oxgate Lane are also omitted. The recessed off-site entrance along Oxgate Lane is another feature not represented in the model. These elements were excluded to provide conservative results, representing a worst-case scenario.
213. Overall, following the introduction of the mitigation strategies, the results of the assessment show that the wind conditions at the ground and elevated levels are safe. In addition, entrances and all other areas on site and off site would be comfortable and fit for intended usage following the introduction of the exoskeleton.

Utilities and Television and Radio Reception Impact

214. A TV and Radio Reception Impact Assessment has been submitted with the application, and updated to reflect the additional five storeys which form part of the revised scheme. The report sets out the

existing levels and quality of radio and television signal reception in the survey area, and concludes that the proposed development is unlikely to cause any interference to the reception of any television or radio broadcast platform. As no interference is expected, no mitigation measures are required to restore the reception of any broadcast service. The proposals are therefore acceptable in this regard.

215. A condition is attached ensuring that high-speed broadband is secured for all future dwellings, in line with London Plan policy SI6.

Employment and training

216. Brent's Local Plan policy BE1 'Economic Growth and Employment Opportunities for All' states an Employment and Training Plan will be required for all major developments, to be prepared in partnership with Brent Works or any successor body.
217. A commitment to submit an 'Employment and Training Plan' to the Council for its approval prior to the material start of the development will be secured by way of a Section 106 obligation. This obligation is required of all major development schemes within the borough which comprise of 50 or more dwellings or at least 5,000 sqm of floor space.
218. As set out in Brent's Planning Obligations SPD (2022), the obligations in this respect require that 1 construction job (for a minimum period of 26 weeks) for an unemployed Brent resident is secured per ten C3 homes delivered and per each 500 sqm of commercial floorspace delivered, and that 50% of those jobs should be secured as apprenticeships for Brent residents, for a minimum period of 52 weeks. It also requires that a minimum of 20% of the operational phase jobs within commercial uses should be secured for Brent residents. The operational job requirements are set out in the Homes and Communities Agency Employment Density Guidance 3rd Edition (2015), requiring 1 operational job per 15-20 sqm of commercial floorspace.
219. When applying these standards to the proposed development, it is projected that 55.5 construction jobs, plus an additional one per each 500sqm of commercial floorspace delivered (9.5 operational jobs), should be secured for unemployed residents, with at least half of these jobs being in the form of apprenticeships for Brent resident's. In addition, reasonable endeavours must be used to secure a minimum of 20% of jobs, one operational, for Brent resident's.

Equalities

220. 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).

Conclusion

221. The proposals would result in a mixed-use re-development of an existing industrial site within the Staples Corner Growth Area. Following significant discussion with the applicants over the timeframe of the application, the quantum and quality of the replacement industrial floorspace provision is now considered acceptable, particularly given the approach and land use strategy now adopted within the SCGA Masterplan. The principle of the hotel is supported despite the out-of-centre location, with a sequential assessment having been undertaken and passed, and weight placed on the Masterplan principles and improved transport links as a result of the opening of Brent Cross West Thameslink station. The overall mix of uses is considered acceptable.
222. The principle of a 22-storey building with lower podium block is acceptable, with the architectural quality of the buildings considered acceptable, and the approach to building height, massing and composition is supported. It has been successfully demonstrated that the design approach is suitable and meets the key criteria of London Plan policy D9, and is supported by the SCGA Masterplan and Design Code.
223. The quality of the proposed hotel rooms is considered to be satisfactory, with good levels of outlook, ventilation and access to amenity space and shared facilities. There would be no harm to the amenity of neighbouring residential properties.
224. Following reduction in parking levels and access arrangements on Oxgate Lane, the highways

arrangements are considered acceptable, subject to S106 contributions towards public realm and future highways improvements to Brent Cross West station connections, improvements to the bus network, and review and implementation of a CPZ in the local area.

225. 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 completion of a Section 106 Agreement.

DRAFT DECISION NOTICE



Brent

DRAFT NOTICE

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

DECISION NOTICE – APPROVAL

Application No: 20/4143

To: Mr Mills
Contour Planning Services Ltd
The Barn
Unit 3, Pirton Grange
Shillington
Hitchin
SG5 3HB

I refer to your application dated **11/12/2020** proposing the following:

Demolition of existing building and basements and replacement with mixed-use development (26,677 sq. m GIA) incorporating 22 storey building and 3 basements, comprising: flexible light industrial (Class E)/B8 employment space (in accordance with Part 3 of Schedule 2 (Class V) of The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)); Class C1 Hotel (including ancillary gym, spa and swimming pool); Class F.1 Conference Centre; Class F.2 community hall; basement car parking accessed from Oxgate Lane; cycle parking; internal service yard; coach drop-off lay-by; management and back of house areas; plant; roof garden and outdoor terraces; public realm improvements and associated works. (REVISED DESCRIPTION AUGUST 2024 - SEE REVISED DRAWINGS AND SUPPORTING DOCUMENTS ON WEBSITE).

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

at **403-405 Edgware Road, Cricklewood, London, NW2 6LN**

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: 03/12/2024

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.

DnStdG

SUMMARY OF REASONS FOR APPROVAL

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

National Planning Policy Framework 2023
The London Plan 2021
Brent's 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):

EDG-TOD-ZZ-ZZ-DR-A-100-110 Rev 1 Site Location Plan (Dated 25.10.2020)
EDG-TOD-ZZ-ZZ-DR-A-200-200 Rev 1 Existing Ground Floor Plan (Dated 07.10.2020)
EDG-TOD-ZZ-ZZ-DR-A-200-210 Rev 1 Existing First Floor Plan (Dated 07.10.2020)
EDG-TOD-ZZ-ZZ-DR-A-200-220 Rev 1 Existing Second Floor Plan (Dated 07.10.2020)
EDG-TOD-ZZ-B2-DR-A-200-230 Rev 1 Existing Roof Plan (Dated 29.10.2020)
EDG-TOD-ZZ-B2-DR-A-200-201 Rev 1 Existing Basement -1 (Dated 09.12.2019)
EDG-TOD-ZZ-B1-DR-A-200-202 Rev 1 Existing Basement -2 (Dated 09.12.2019)
EDG-TOD-ZZ-ZZ-DR-A-300-100 Rev 1 Existing Elevations (Dated 28.10.2019)
EDG-TOD-ZZ-ZZ-DR-A-300-101 Rev 1 Existing Courtyard Elevations (Dated 07.10.2020)
EDG-TOD-ZZ-ZZ-DR-A-100-130 Rev 2 Proposed Site Plan (Dated 16.08.2024)
EDG-TOD-ZZ-ZZ-DR-A-200-100 Rev 2 Proposed Ground Floor (Dated 16.08.2024)
EDG-TOD-ZZ-ZZ-DR-A-200-101 Rev 2 Proposed First Floor (Dated 16.08.2024)
EDG-TOD-ZZ-ZZ-DR-A-200-102 Rev 2 Proposed Second Floor (Dated 16.08.2024)
EDG-TOD-ZZ-ZZ-DR-A-200-103 Rev 2 Proposed Third Floor (Dated 16.08.2024)
EDG-TOD-ZZ-ZZ-DR-A-200-104 Rev 2 Proposed Fourth Floor Plan / Podium (Dated 16.08.2024)
EDG-TOD-ZZ-ZZ-DR-A-200-105 Rev 2 Proposed Typical Hotel Floor (Dated 16.08.2024)
EDG-TOD-ZZ-ZZ-DR-A-200-106 Rev 2 Proposed Twentieth Floor Restaurant / Terrace Lounge Plan (Dated 16.08.2024)
EDG-TOD-ZZ-ZZ-DR-A-200-107 Rev 2 Proposed Roof Plan (Dated 16.08.2024)
EDG-TOD-ZZ-ZZ-DR-A-200-010 Rev 2 Proposed Basement -1 (Dated 16.08.2024)
EDG-TOD-ZZ-ZZ-DR-A-200-020 Rev 2 Proposed Basement -2 (Dated 16.08.2024)
EDG-TOD-ZZ-ZZ-DR-A-200-030 Rev 2 Proposed Basement -3 (Dated 16.08.2024)
EDG-TOD-ZZ-ZZ-DR-A-300-301 Rev 2 Proposed South East Elevation (Exo-Skeleton) (Dated 16.08.2024)
EDG-TOD-ZZ-ZZ-DR-A-300-302 Rev 2 Proposed South East Elevation (Streetscape) (Dated 16.08.2024)
EDG-TOD-ZZ-ZZ-DR-A-300-303 Rev 2 Proposed Edgware Road Elevation (Dated 16.08.2024)
EDG-TOD-ZZ-ZZ-DR-A-300-304 Rev 2 Proposed Edgware Road Elevation (Streetscape) (Dated 16.08.2024)
EDG-TOD-ZZ-ZZ-DR-A-300-305 Rev 2 Proposed Oxgate Lane Elevation (Excluding Exo-Skeleton) (Dated 16.08.2024)
EDG-TOD-ZZ-ZZ-DR-A-300-306 Rev 2 Proposed Oxgate Lane Elevation (Streetscape) (Dated 16.08.2024)
EDG-TOD-ZZ-ZZ-DR-A-300-307 Rev 2 Proposed South West Elevation (Dated 16.08.2024)
EDG-TOD-ZZ-ZZ-DR-A-300-308 Rev 2 Proposed South West Elevation (Streetscape) (Dated 16.08.2024)
EDG-TOD-ZZ-ZZ-DR-A-400-401 Rev 2 Proposed Section AA (Dated 16.08.2024)
EDG-TOD-ZZ-ZZ-DR-A-400-403 Rev 2 Proposed Section BB (Dated 16.08.2024)

6570-PHL-SW-ZZ-DR-L-2000 Rev 00 Landscape Proposal (Dated 16.08.2024)
6570-PHL-SW-ZZ-DR-L-2300 Rev 00 Soft Works Plan (Dated 24.07.2024)
1808_PL01 Rev C Proposed Access Arrangements (Dated 25.06.2024)

Supporting Documents

Revised Design & Access Statement (Rev P01) – TODD Architects - August 2024
Townscape Visual Impact Assessment – Park Hood Architects – ref. 896/ER/TVIA/2024 - dated August 2024
Noise Impact Assessment – Anderson Acoustics – ref. 6168_001R_0-1_RHM - August 2024
Flood Risk Assessment & Drainage Strategy – Parmarbrook – ref. 1946 Rev 1.1 – December 2020
Landscape Management & Maintenance Plan - 4570-PHL-SW-XX-OHL-2001 - August 2024
Ecological Impact Assessment – ECOSA - 20.0378.0002.F0 - August 2024
Arboricultural Impact Assessment – Innovation Group Environmental Services – ref. PA-15233-Rev-1 – November 2020
Fire Statement – Marshall Fire – Rev 01 - August 2024
Wind Microclimate CFD Study – Windtech - WH247-01F02(rev1) - August 2024
Framework Delivery and Servicing Plan - Transport Planning Associates - August 2024
Car Parking Management Plan – Transport Planning Associates – Ref. 1808-16-TN08 v01 - August 2024
Revised Circular Economy and Whole Life Carbon Statement – BPP Energy - August 2024

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

- 3 The development hereby approved shall be built so that no less than 4858 sqm of industrial floorspace Class E(g) (iii)/ Class B8, and no greater than 120 sqm of Class E(a) or (b) floorspace is provided, unless otherwise agreed in writing by the Local Planning Authority.

The industrial floorspace approved shall be subdivided into individual units of no more than 1,000 sqm (GIA) of Class E(g)(iii) or B8 floorspace unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure maximum re-provision of industrial floorspace is provided and to limit the quantum of Class E(a) or (b) floorspace outside of a town centre, and to ensure servicing arrangements for any individual unit are acceptable in highways terms.

- 4 The scheme hereby approved shall contain 210 rooms within the proposed hotel, as detailed in the drawings hereby approved, unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of proper planning.

- 5 No guest or customer of the hotel use hereby permitted may occupy any part of the hotel accommodation for a period exceeding ninety days (90) in any continuous period of six months. The operator of the hotel shall at all times maintain an accurate register of the permanent addresses of all guests and of the dates of their occupancy of the accommodation. These registers shall be kept for not less than two years from the date of the last entry and shall be made available to be inspected by the Local Planning Authority upon reasonable request.

Reason: To ensure the hotel accommodation meets an identified need and the quality of the hotel accommodation is sufficient in accordance with Brent Policy BE9.

- 6 The development shall be built so that no fewer than 10% of the hotel rooms hereby approved are accessible rooms in accordance with the criteria set out in London Plan 2021 policy E10 (H)(1). These aparthotel rooms shall be maintained as accessible for the lifetime of the development.

Reason: To ensure that the hotel development achieves an inclusive design.

- 7 The development hereby approved shall be carried out fully in accordance with the approved Flood Risk Assessment and Drainage Strategy prepared by Parmarbrook Ltd dated 9th December 2020, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure adequate arrangements for drainage of the site, in accordance with London Plan Policy SI13 and Brent Local Plan Policies BSUI3 and BSUI4.

- 8 The development hereby approved shall be carried out fully in accordance with the mitigation measures set out within the Ecological Impact Assessment prepared by ECOSA Ecological Survey & Assessment dated August 2024 unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of the ecological and biodiversity value of the site, having regard to Local Plan policies DMP1, BGI1, BGI2 and London Plan policy G6.

- 9 The car parking spaces including the disabled parking bays as detailed within the approved plans shall be provided prior to occupation of the development, with 24 of the spaces provided with electric vehicle charging infrastructure from the outset and the remainder to be provided with passive provision. This charging infrastructure shall be permanently maintained thereafter for the lifetime of the development, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To comply with London Plan policy T6.1.

- 10 The development hereby approved shall be carried out fully in accordance with the approved Arboricultural Impact Assessment, including AIA, Tree Survey and Tree Protection Plan, prepared by Innovation Group Environmental Services dated 12th November 2020, unless otherwise agreed in writing by the Local Planning Authority.

Reason: In order to ensure adequate consideration for trees, in accordance with Brent Policy BGI2 .

- 11 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.

- 12 The development hereby approved shall be carried out fully in accordance with the mitigation measures set out within the Wind Microclimate CFD Study prepared by Windtech dated 16 August 2024 unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of ensuring suitable microclimate conditions for occupiers of the development and pedestrians at street level.

- 13 No development shall commence until a written scheme of investigation (WSI) shall be submitted to and approved in writing by the Local Planning Authority. The WSI shall provide details of the programme of historic building recording works to be carried out within the site, including post-fieldwork reporting and appropriate publication. The historic building recording

site work shall thereafter be implemented in full in accordance with the written scheme of investigation.

The recording is to be carried out on the building internally and externally in accordance with Historic England's Understanding Historic Buildings to a Level 3 standard by a professional archaeological/building recording consultant or organisation with a proven track record of delivering historic building recording. No demolition or development shall take place before the historic building recording has been completed in accordance with the written scheme of investigation approved and the provision made for analysis, publication and dissemination of the results and archive deposition has been secured.

Reason: To ensure that the heritage of the existing building of the site are adequately documented.

Reason for pre-commencement condition: To ensure that the heritage of the existing building is adequately documented prior to any demolition works taking place.

- 14 No development shall commence until full details of mitigation measures, include selective salvage and a history of the building prominently displaced in the hotel lobby, are secured in consultation with the Council's Heritage Officer and key heritage groups. The agreed measures shall thereafter be provided in accordance with the agreed measures and retained on display throughout the lifetime of the development.

Reason: To ensure that the heritage of the existing building are adequately preserved and documented.

Reason for pre-commencement condition: To ensure that the heritage of the existing building is adequately documented prior to any demolition works taking place.

- 15 Prior to commencement of the development hereby approved (including site clearance and demolition works), a Construction Logistics Plan (CLP) shall be submitted to and approved in writing by the Local Planning Authority, in consultation with Transport for London. The CLP include, but not limited to details on the measures that will be implemented to ensure a safe environment for pedestrians and cyclists using surrounding streets during the construction phase, the measures that will be implemented to ensure no adverse impact on bus operations and infrastructure adjoining or in proximity to the site, details on the discussion had with adjoining development and/or schemes and measures to be implemented to reduce the cumulative impact and a commitment to avoid deliveries during the peak hour. 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 .

- 16 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.

- 17 (a) 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.

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

- 18 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.

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

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.

- 20 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.

- 21 Prior to the commencement of development (excluding demolition, site clearance and laying of

foundations), further details of external materials (including samples of key materials which shall be provided on site for inspection or in another location as agreed, and/or manufacturer's literature) shall be submitted to and approved in writing by the local planning authority, and thereafter completed in accordance with the approved details.

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.

- 22 Prior to development commencing above ground on the development, a detailed landscaping scheme and implementation programme for all works within the red line boundary of the site 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:

- (i) Details of hard surfacing, including details of permeable paving, tree pit design, underground modular systems, etc.
- (ii) Boundary treatment, means of enclosure and retaining structures;
- (iii) Other equipment and structures including precise locations of all Sheffield cycle stands to be provided within the public realm for a minimum of 28 sheffield stands for short-term cycle spaces;
- (v) Species, locations and densities for 60 trees, grass and shrubs;
- (vi) Proposed walls, fencing, screening treatment and gates and any other permanent means of boundary treatment/enclosure, indicating materials, position and heights;
- (ix) Details of biodiversity enhancement measures to achieve a net gain in biodiversity within the site;
- (xi) Details to maximise the urban green factor (UGF) for the site in line with policy G5 of London Plan 2021, including the requirement to submit a UGF Masterplan;
- (xii) Details of any external CCTV installations;
- (xiii) A Landscape Management and Maintenance Plan setting out details of the proposed arrangements for maintenance of the landscaping, including management responsibilities.

The approved landscaping scheme shall thereafter be carried out in full accordance with the implementation programme prior to first occupation or use of the building.

It shall thereafter be maintained 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.

There shall be no excavation or raising or lowering of levels within the prescribed root protection area of retained trees unless agreed in writing by the Local Planning Authority. Unless required by a separate landscape management condition, all soft landscaping scheme shall incorporate written five year maintenance programme following planting.

Reason: In order to introduce high quality landscaping in and around the site in the interests of the ecological value and biodiversity of the site and to ensure a satisfactory landscaping of the site in the interests of urban greening and visual amenity having regard to Local Plan Policies DMP1, BG11 and BG12 and London Plan policies G5, G6 and G7.

- 23 Prior to commencement of above ground works, proof that the plans can achieve secured by design accreditation must be submitted to the design out crime officer and the Local Planning Authority. The site / development should demonstrate reasonable endeavours have been used to achieve secured by design accreditation to silver and maintain this standard throughout the lifetime of the development.

Reason: In the interests of reducing the potential for crime, in accordance with Local Plan Policy

DMP1.

- 24 Prior to the commencement of use of the hotel, an Accessibility Management Plan (relating to the hotel use) shall be submitted to and approved in writing by the Local Planning Authority. This shall demonstrate the future operator's commitment to the provision of an inclusive and accessible facility which is reviewed on a quarterly basis in accordance with the principles laid out in Section 10 of the Design and Access Statement submitted with the application.

The Plan shall be fully implemented as approved thereafter, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that the hotel development achieves an inclusive design.

- 25 Prior to first occupation or first use of the development, a Community Access Plan relating to the use of the Flexible F1/F2 Space shall be submitted to and approved in writing by the Local Planning Authority. The Community Access Plan shall include details of rates of hire (based upon those charged at other public facilities), terms of access, hours of use, access arrangements and management responsibilities.

The approved Community Access Plan shall be brought into operation within 3 months of first occupation or use of the facilities and it shall remain in operation for the duration of the use of the Development.

Reason: To ensure the development is fit for purpose and provides facilities for local communities, and to protect the amenity of local residents.

- 26 Prior to first occupation or use of the development hereby approved, a full Delivery and Servicing Plan (DSP) outlining measures proposed to reduce the impact of servicing on the surrounding transport network, and how the site will look to support sustainable and active freight shall be submitted to and approved in writing by the local planning authority. 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, in accordance with Policy T7 of the London Plan.

- 27 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.

The lighting shall not be installed other than in accordance with the approved details.

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

- 28 Prior to the occupation of the development 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.

- 29 Prior to the occupation of the 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. 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.

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

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

- 31 Within six months from practical completion of the development hereby approved, a BREEAM Assessment and Post Construction Certificate, demonstrating compliance with the BREEAM Certification Process for non-domestic buildings and the achievement of a BREEAM Excellent rating, unless otherwise agreed in writing, shall be submitted to and approved in writing by the local planning authority.

Reason: To ensure the non-residential floorspace is constructed in accordance with sustainable design and construction principles, in accordance with Brent Local Plan Policy BSUI1.

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