

# COMMITTEE REPORT

Planning Committee on  
Item No  
Case Number

10 February, 2021  
03  
20/2784

## SITE INFORMATION

RECEIVED	29 September, 2020
WARD	Alperton
PLANNING AREA	
LOCATION	Land Former 17 Northfields, Beresford Avenue, Wembley, HA0 1NW (Known as "Grand Union")
PROPOSAL	<p>Hybrid planning application comprising:-</p> <p>Outline planning permission for the demolition of existing buildings and structures on the site, all site preparation works and redevelopment to provide new buildings to accommodate new homes (Use Class C3), flexible commercial uses, new basement level, associated cycle and vehicle parking, new vehicular accesses, associated highway works to Beresford Avenue, landscaping and creation of new public and private open space, ancillary facilitating works, various temporary meanwhile uses, interim works and infrastructure with all matters reserved - appearance, access, landscaping, layout and scale.</p> <p>Detailed planning permission for Phase 3 (Buildings G, H and J) for the demolition of existing buildings and structures, all site preparation and infrastructure works and the development of new homes (Use Class C3) and flexible commercial floorspace; together with new basement level, associated storage, cycle and vehicle parking, new vehicular accesses, associated highway works to Beresford Avenue, landscaping and creation of new public and private open space, ancillary facilitating works.</p> <p>APPLICATION SUBJECT TO AN ENVIRONMENTAL STATEMENT</p>
PLAN NO'S	See condition 2
LINK TO DOCUMENTS ASSOCIATED WITH THIS PLANNING APPLICATION	<p><b><u>When viewing this on an Electronic Device</u></b></p> <p>Please click on the link below to view <b>ALL</b> document associated to case <a href="https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&amp;keyVal=DCAPR_&lt;systemke">https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&amp;keyVal=DCAPR_&lt;systemke</a></p> <p><b><u>When viewing this as an Hard Copy .</u></b></p> <p><b>Please use the following steps</b></p> <ol style="list-style-type: none"><li>1. Please go to <a href="https://pa.brent.gov.uk">pa.brent.gov.uk</a></li><li>2. Select Planning and conduct a search tying "20/2784" (i.e. Case Reference) into the search Box</li><li>3. Click on "View Documents" tab</li></ol>

## RECOMMENDATIONS

To resolve to grant planning permission, subject to the Stage 2 referral to the Mayor of London and subject to the completion of a satisfactory Section 106 or other legal agreement, and the conditions and informatives recommended in this report, and to delegate authority to the Head of Planning or other duly authorised person to agree the exact terms thereof on advice from the Chief Legal Officer.

A. That the Committee resolve the GRANT planning permission subject to:

1. Any direction by the London Mayor pursuant to the Mayor of London Order
2. Any direction by the Secretary of State pursuant to the Consultation Direction
3. The prior completion of a legal agreement to secure the following obligations:
4. Payment of the Council's legal and other professional costs;
5. Notification of a material start 28 days prior to commencement;
6. Join the Considerate Contractors Scheme;
7. The provision of 35% affordable housing, subject to appropriate tenure splits;
8. The provision of an early stage viability mechanism to capture any uplift in affordable housing;
9. To provide sustainability improvements;
10. To provide a new healthcare facility;
11. To provide Training and Employment opportunities;
12. To provide Employment Generating floorspace, including Affordable Workspace;
13. To provide Travel Plans;
14. To provide a CPZ Contribution;
15. To provide a Bus Service Contribution;
16. To restrict Parking Permits to future occupiers;
17. To provide Highway Improvement Works;
18. To provide a Public Art Strategy;
19. Indexation of contributions from date of original permission
20. Any other as deemed necessary.

B. That the Head of Planning is delegated authority to negotiate the legal agreement indicated above.

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

1. Commencement
2. Approved Plans
3. Scale, Appearance, Layout, Access and Landscaping
4. Time Limits for Reserved Matters
5. Time Limits for Reserved Matters (Time Limit)
6. List of Documentation for Reserved Matters Applications
7. Phasing
8. CIL Chargeable Plan
9. Fixed Plant Noise
10. Sound Insulation
11. Noise and Vibration
12. Land Contamination
13. Land Contamination (Remediation)
14. Private Residential Mix
15. Landscaping
16. Sustainable Urban Drainage
17. Accessible Units
18. Compliance with London Housing Design Standards
19. Materials
20. Transport and Parking
21. Air Quality Assessment
22. Odour
23. Drainage Strategy
24. Water Supply
25. Construction Method Statement
26. Construction Environmental Management Plan

27. Waste Management Scheme
28. Construction Logistics Plan
29. Piling Method Statement
30. Ecological Mitigation
31. Estate Management
32. Play Space
33. Delivery and Servicing Plan
34. Wind Mitigation
35. BREEAM (Excellent) Pre-Assessment
36. BREEAM (Excellent) Post- Assessment
37. Waste Strategy compliance
38. C3 to C4 restriction
39. EA - further details of works to River Brent
40. Use class restriction on commercial floorspace

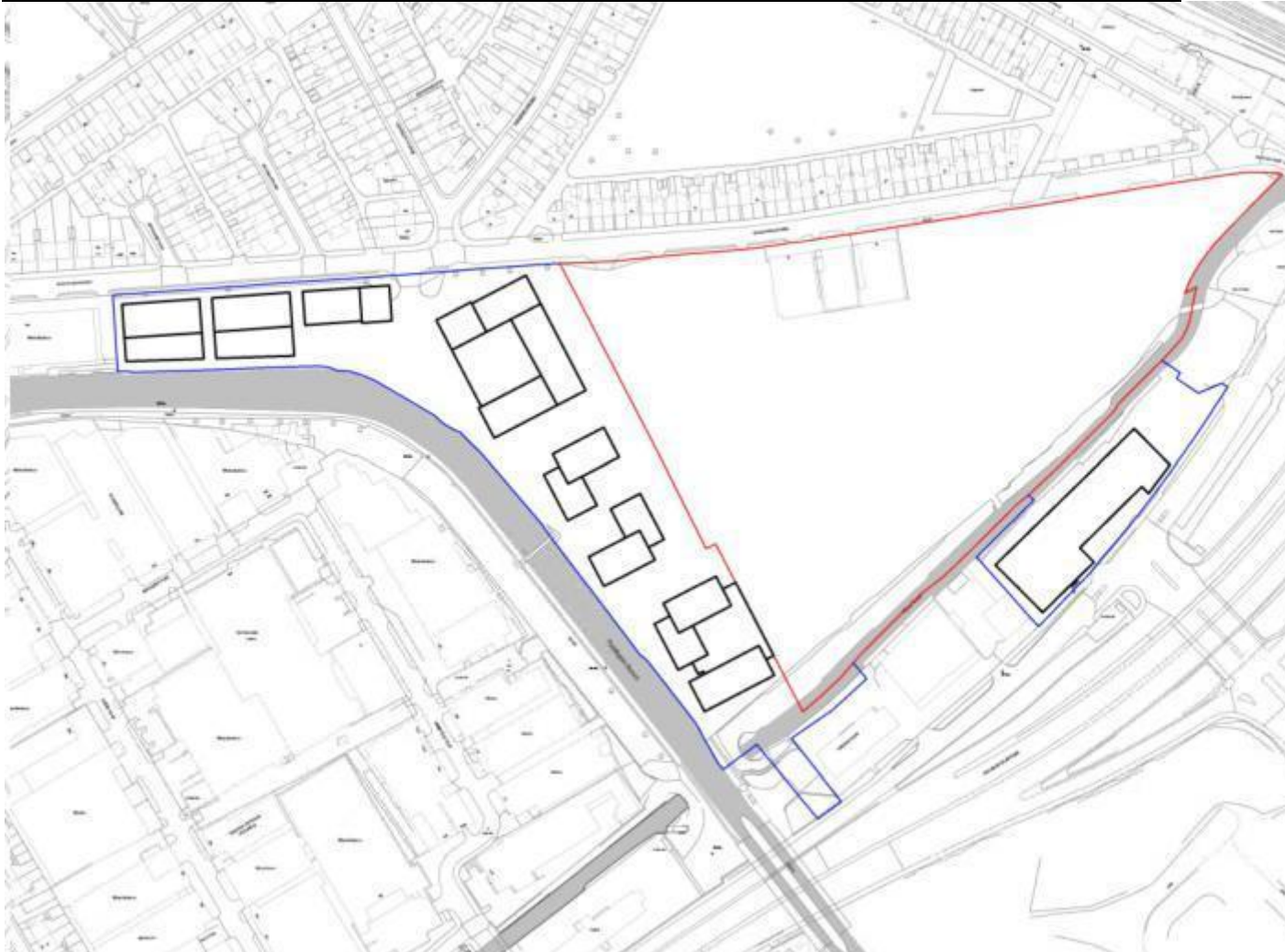
## SITE MAP



### Planning Committee Map

Site address: Land Former 17 Northfields, Beresford Avenue, Wembley, HA0 1NW (Known as "Grand Union")

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This map is indicative only.

## PROPOSAL IN DETAIL

### Background

A planning application was approved on 28<sup>th</sup> September 2018 (subject to section 106 legal agreement) for the redevelopment of the former Northfields Industrial Estate, now known as Grand Union (application reference: 18/0321). This was submitted as a hybrid application, part detailed (Phase 1) and part outline (Phases 2-6). With respect to the outline component, matters of access, layout, scale, appearance and landscaping were reserved for future determination.

The 2018 application proposed the following key components:

- 2,900 homes including 1,015 affordable homes (35% by habitable room),
- up to 2,300sqm commercial floorspace (Use Classes A1-A5),
- up to 19,000sqm employment floorspace (Use Classes B1a, B1c and B8, now classed as E(g)(i), E(g)(iii) and B8 under the changes to the Use Classes Order Sep 2020),
- up to 2,900sqm community and assembly and leisure floorspace (Use Classes D1 and D2 (now classed as F.1 and E(d) under the new Use Classes Order Sep 2020),
- an energy centre,
- public and private open space,
- new routes and public access along the River Brent and Grand Union Canal,
- parking and cycle parking provision, including within a basement level, and
- new site access and ancillary infrastructure.

Following grant of the 2018 hybrid permission a number of non-material amendment applications, and a minor material amendment application (Section 73 application) have been approved by the Local Planning Authority, including an increase in dwelling numbers (and associated affordable housing), and an increase in employment generating floorspace on 'The Generator' site.

The wider site now benefits from planning permission for 3,030 homes of which 35% will be affordable (on a habitable room basis) and 23,441sqm GEA of commercial floorspace (of which 19,627sqm GEA is industrial floorspace) The increase in the number of homes and commercial floorspace from the parent permission was enabled by the granting of non-material amendment application reference 19/0456 which was approved on the 7<sup>th</sup> March 2019 (see further detail within planning history section of report below).

To date, detailed planning permission has been granted for Phase 1, and details have been approved through a reserved matters application for Phase 2 (ref. 19/3674). A combined total of 924 homes have been secured under Phases 1 and 2, as well as commercial floorspace (Use Classes A1-A5, B1a, D1 and D2, as per the now superseded Use Classes Order). 'The Generator', which is now located within Phase 4a of the revised Phasing Plan, has also been approved in detail under reserved matters and comprises 18,128 sqm (GEA) of employment floorspace (ref. 19/0925).

It is considered that the extant planning permission has been implemented and the construction of Phase 1 of the consented Scheme is underway. The Applicant intends to construct the consented Phase 1, Phase 2 and Phase 4a (The Generator) as per their current planning permissions and as such these areas are not included within the red line boundary of the new application being considered here. However, the requirement to deliver the affordable housing and employment floorspace as previously consented would be required under a new legal agreement which would accompany any consent granted for this application

### Revised Masterplan

This application essentially seeks a new planning permission for Phases 3 and 4b to 7 following

an extensive review of the extant permission. These phases principally comprise the core residential component of the consented scheme, however would deliver an uplift of approximately 10% in residential units across the Masterplan area.

### Detailed component (Phase 3)

Within the Phase 3 detailed element of the development:

- Buildings G, H and J would provide 439 homes, 35% of which would be affordable on a habitable room basis. All 98 affordable rent units would be provided in Building G, with the 39 shared ownership units delivered on lower floors of Building H.
- Building G would provide 72sqm of commercial floorspace (Use Classes E, F1 and Sui Generis) at ground floor level.

### Outline component (Phases 4b-7)

For the outline component planning permission is sought for:

*'Outline planning permission for the demolition of existing buildings and structures on the site, all site preparation works and redevelopment to provide new buildings to accommodate new homes (Use Class C3), flexible commercial uses (Use Classes E and F1 and Sui Generis), new basement level, associated cycle and vehicle parking, new vehicular accesses, associated highway works to Beresford Avenue, landscaping and creation of new public and private open space, ancillary facilitating works, various temporary meanwhile uses, interim works and infrastructure with all matters reserved – appearance, access, landscaping, layout and scale.'*

The outline element of the development is defined through a Development Specification document and through Parameter Plans setting out the following:

- Basement Extent;
- Detailed and Outline Components;
- Ground Floor Level Heights;
- Ground Floor and Above Plot Extent;
- Proposed Access Plan within the Site;
- Maximum Building Heights;
- Open Spaces;
- Demolition.

In addition to the Development Specification document and Parameter Plans, a Framework Design Code supports the outline application and together these form the controlling documents. These set out the parameters and limits that would inform all future Reserved Matters applications.

The submission includes an Illustrative Masterplan which indicates how the outline development could be delivered. However, this masterplan is illustrative only. This application, does not seek approval for the detailed design or external appearance of buildings or landscape proposals within the outline application area, which would be the subject of future Reserved Matters applications that would be made in accordance with the established parameters for the outline development.

### Access

The primary vehicular access/egress point to Phases 4b to 7 would be from Beresford Avenue located between Buildings D and G, in the location of the existing Wycombe Road junction. This primary route would act as a 'north-south west' connection through the Site, and is the principal for entry movement of all uses across the site. Secondary vehicular routes (access for emergency vehicles, cyclists and pedestrians only) would be created between Plots K, L and P and between Plot M and the River Brent.

The primary pedestrian route would be along Beresford Avenue and between the Plots. A secondary pedestrian route would be created along the River Brent and a pedestrian and cycle path will be created through the River Meadows and central garden. The main refuse service route for vehicles accessing the outline component is from the main access road serving the whole development.

Open Space

Each building Plot would contain a specific form of amenity provision. This would include private / semi-private amenity space comprising balconies, front/rear gardens, communal gardens and roof terraces. The details of semi-private doorstep play will be distributed across communal gardens providing informal and equipped play space, and will be established at each reserved matters stage.

At the heart of the masterplan, situated between Plots L, M and P, is the ‘**Central Gardens**’ **Character Area**. This area would include flexible civic space, semi mature trees, amenity grass and ornamental shrubs. Informal and equipped play space will also be located within this area.

Adjacent to the River Brent is the ‘**Riverside Meadows**’ **Character Area**. In this location, restoration of the natural landscape including replacement tree planting would be undertaken. The area would include informal and equipped play space; details of which would be secured within later reserved matters submissions.

The public realm around the building plots will comprise street trees and shrubs.

Uses

The application continues to propose a mixed use development, however as outlined earlier in this report the majority of commercial and employment floorspace is being delivered in earlier Phases outside of the revised Masterplan area. There would be no uplift in the industrial floorspace proposed by this application. A breakdown of proposed uses and floorspace amounts are provided in the table below:

Phase/Plot	Residential Units	Residential	Ancillary Residential	Flexible Commercial Uses
Phases 4b-7 (Plots K, L, M, P, Q and R)	Up to 1,987	Up to 200,790 m <sup>2</sup> GEA (excluding new basement)	38,906 m <sup>2</sup> GEA	Up to 614 m <sup>2</sup> GEA

To allow flexibility in the delivery of the development across the site, the proposed level of floorspace for each use has been expressed as a maximum amount. The application also proposes a flexible approach to the distribution of commercial and community and assembly and leisure floorspace over time by establishing minimum and maximum floorspace figures. This has been sought by the applicants, and agreed in principle by officers to provide flexibility to respond to market conditions and ensure the full occupation of space.

Although the aggregate total of the maximum floorspaces would exceed the total floorspace applied for it would not be possible to reach the maximum permitted floorspace for both the commercial and community and assembly and leisure uses, and therefore this overall total would not be exceeded. In order to comply with regional and local policy there are minimum quantum of floorspace proposed, which would be the lowest amount of this type of floorspace the applicants

could deliver through their reserved matters applications. This would be monitored on an application by application basis to ensure the minimum quantum of floorspace as stipulated are being delivered.

Within the outline element of the development:

- Building Plots K-R would provide up to 1,987 homes, together with commercial space (Use Classes E(a)-(c) and Sui Generis) and assembly and leisure space (Use Classes F1 and E(d)) at ground floor.

The single basement proposed at lower ground floor level would provide space for car parking, cycle parking, bin storage and plant to serve the development and has capacity of around 1,482 car parking spaces (including 85 disabled spaces for the entire Masterplan) and cycle storage areas, as well as access cores to the floors above, and internal access ramps.

### Building Plots, Streets and Open Spaces

The submission includes 9 building plots which are located within four 'Character Areas'. These share common characteristics, but would each have a distinct character as a result of the materials, elevational treatment, massing, use and function of the component buildings and spaces. Details of these material palettes would be contained within the final Design Guide, secured under Condition 19.

The series of buildings across the site would be of varying height and scale, and would be arranged around a hierarchy of streets that connect through and across the site to form a network.

5.7ha of open space (both private and public) would now be delivered across the entire Masterplan area (i.e. both the original and revised schemes), which represents a 15% uplift above the consented scheme. The main basis of this would be located around three principal public open spaces at the 'Central Gardens' (0.6ha), 'Riverside Meadows' (up to 0.83ha) and 'Canalside' (up to 0.76ha). The remainder is distributed around the site.

## **EXISTING**

The application site is located to the south of Beresford Avenue and to the north of the River Brent and The Generator (Plot N) building, secured as part of the original Masterplan site. To the immediate west are Phases 1 and 2 of the original Masterplan, which are under construction. The Grand Union Canal runs further to the south west, while the River Brent divides the application site from The Generator building. The revised Masterplan site itself has a total area of 5.34 ha. When combined with the original Masterplan site, it has a total area of 9.16ha, the majority of which is to the north of the River Brent (8.1ha), while the smaller southern part has an area of 1.06ha.

The majority of the site (with the exception of a small area at the north-west) is part of the Park Royal Strategic Industrial Location (SIL) as designated by the London Plan. The north-west part that is not SIL land is a non-designated Local Employment Site in accordance with the Brent Development Management Policies document.

The site is wholly within the Alperton Housing Zone designated by the Mayor of London, and the north-west part of the site is also part of the Alperton Growth Area as identified within the Brent Site Specific Allocations document. To the south of the site is the boundary of the Old Oak and Park Royal Opportunity Area identified by the London Plan and Old Oak and Park Royal Opportunity Area Planning Framework SPG.

There are no conservation areas or listed buildings within or adjacent to the application site. The nearest listed building to the site is the Grade II listed "Brent Viaduct" over the North Circular Road (listing number 1078890). The River Brent and Grand Union Canal are each designated as Sites of Importance for Nature Conservation (SINC), and the southern and western parts of the site are

designated as 'Waterside Development' within the Brent Development Management Policies document.

The site comprises brownfield land which was formerly in use as an industrial estate, most recently accommodating a range of low density uses such as car workshops, car dealers, storage, and industrial uses. Much of the site has previously been cleared (and used as open air storage) and comprises areas of hardstanding, although there are some vacant predominantly single and two storey commercial buildings to the centre and western part of the site, and three industrial units remain along Beresford Avenue and are currently occupied under different ownership.

The site has a varying Public Transport Accessibility Level (PTAL) rating, with a rating of 0 (very poor) for limited areas at the west of the site, increasing towards the east to a rating of 3 (moderate). Stonebridge Park station is approximately 0.3km (as the crow flies) and a 1km walk along Beresford Avenue and the Old North Circular Road to the north east of the site and Alperton Underground station is approximately 0.9km (as the crow flies) and a 1.5km walk along Mount Pleasant and Ealing Road to the west, and there are local bus stops on Beresford Avenue and the North Circular Road.

To the north of the site on Beresford Avenue is two-storey semi-detached and terraced housing with the former Rizla factory building (which makes a positive contribution to the streetscene) towards the north east. To the east of the site is the Ace Café, while to the south and west are existing industrial uses.

#### AMENDMENTS SINCE SUBMISSION

Revised drawings were received amending the mix of intermediate units provided within Phase 3 of the development, with two additional three-bed units replacing 1 x studio unit and 2 x 2-bedroom units. This reduces the overall number of units proposed within Phase 3 from 440 to 439. Officers consider this to be a non-material change which did not require further consultation with adjoining occupiers or statutory consultees.

#### SUMMARY OF KEY ISSUES

The key planning issues for Members to consider are set out below. Objections have been received regarding some of these matters. Members will have to balance all of the planning issues and objectives when making a decision on the application, against policy and other material considerations.

- **Comments received:** Two responses have been received from adjoining businesses and residents, consisting of objections principally raising concerns regarding scale & design, heritage impacts, lack of policy compliant affordable housing, and impacts on local business and employment uses.
- **Principle of land uses:** the continued residential-led re-development of the site is strongly supported in light of the extant Masterplan consent and the intended de-designation of SIL land, with the re-provision of a high quality and amount of industrial floorspace secured and supported by the GLA.
- **The re-provision of industrial generating uses** and workspace, including the provision of a high-density purpose built E(g)(iii)/ B8 development, along with additional E(g)(iii)/ B8 and E(g)(i) floorspace across the development which would result in no net loss of employment floorspace as a result of the proposal. The proposals are considered to be in accordance with national, regional and local policies.
- **Affordable Housing & Financial Viability:** 35% affordable housing (by habitable room) would be provided on a policy compliant tenure split (70% affordable rent, 30% intermediate), and this is in accordance with the position established by the extant Masterplan. The GLA have confirmed that the Fast Track Route is applicable to the revised scheme. The applicants have agreed to the Council's requirements with regard nomination rights, and for the timing of delivery of the affordable units. A proportionate number of London Affordable Rented units would be secured on the uplift of 320 units across the



revised scheme, in line with the requirements set out within the Mayor's Affordable Housing and Viability SPG. The requirements of affordable housing obligations are considered to have been met.

- **Design and Layout:** The approach to the design and layout of the buildings and public spaces within the three proposed character areas would result in a coherent and legible masterplan. While it is acknowledged the proposed development would include elements that are significantly taller than the surrounding residential properties, it is considered that the proposed building heights step away from the more sensitive existing and proposed lower level buildings on and within the vicinity of the application site in a logical manner that would protect existing residential amenity, and would be appropriate for the future context of the site, and necessary for the provision of a high quantum of good quality residential accommodation.
- **Heritage:** there are no designated or non-designated heritage assets located on the application site. While there is one non-designated heritage asset located to the north of the application site, and a Grade II listed railway viaduct 500m to the north-west, the proposed development would have no material impact, nor would the proposed development affect the setting of any Conservation Area.
- **Landscaping, Open Space & Trees:** Some existing trees are proposed to be removed but they are not considered worthy of any specific protection or retention. The proposal includes extensive landscaping and open space provision including tree planting which would result in net improvements to both the quality and quantity of the landscaping and open space in the area, to the amount of publicly accessible open space in the area and to the ecological value of the application site.
- **Transportation & Highways:** it is acknowledged that the development would result in increased use of the road network by vehicles (through the provision of Blue Badge spaces), cyclists and pedestrians. However, the scheme (and the extant permission) includes significant highways improvements to Beresford Avenue and the route to Stonebridge Park Station, which include pedestrian and cycle network improvements. The impact on the road network has been assessed by Brent and TfL, who consider the proposed Transport Assessment to be acceptable, subject to agreed mitigation measures.
- **Quality of accommodation:** The proposed residential accommodation would meet all national, regional and local planning policy and guidance to acceptable levels with regard to internal layouts and room sizes. The proposed residential units would have acceptable access to outlook, daylight and sunlight.
- **Dwelling Mix:** The proposal includes a total of 587 family sized homes (taking into account the indicative mix within the element of the scheme) which represents 24.2 % of the homes within the proposal, and is only marginally below the 25 % target in adopted and emerging policy. 28 % of the Affordable Rented homes are proposed to be family sized. The proposed housing mix is considered to represent a good balance between the provision of family sized homes and Affordable Housing.
- **Amenity Space:** A significant amount of external amenity space is proposed in the form of private balconies and terraces, over 11,000 sqm of communal space and approximately 23,000 sqm of new public open space, accessible to both residents of the proposed development and other residents in the area. The proposed provision of external amenity space falls below Brent targets and 50 homes within Phase 3 would have outdoor space below emerging London Plan Policy D6 targets. However, due to the provision of a significant quantum of usable public outdoor space, shared private amenity space, proximity to nearby public open spaces and an off-site contribution for improvements to playspace within the vicinity of the application site which has already been secured via section 106 agreement, it is considered that the shortfall is not to a degree that would significantly affect the quality of the space and the proposed areas of external amenity space are considered to be sufficient in size and type to satisfy the needs of future residents. The limited conflict with policy is considered to be outweighed by the benefits of the proposed development.
- **Neighbouring amenity:** There would be a loss of light to some windows of surrounding buildings, as is expected from a development of this scale. However, the overall impact of

the development is on balance considered to be acceptable, particularly in view of the wider regenerative benefits including the provision of a significant number of new homes, affordable housing, landscaping, amenity space and employment. Levels of daylight and sunlight reductions would not be materially worse than the extant Masterplan.

- **Energy and sustainability:** The measures outlined by the applicant achieve the required improvement on carbon savings within London Plan policy. The proposed development would deliver efficient water use for residential units, and conditions will require further consideration of carbon savings prior to implementation, along with BREEAM 'Excellent' certification for non-residential floorspace.
- **Accessibility:** the site has a varying PTAL from 0 to 3. Contributions are proposed towards improvements to buses and the route to Stonebridge Park Station, and the PTAL will increase to around 3 across the application site as a result.
- **Density:** While it is acknowledged that the proposed development would have a significantly higher density to that of the existing residential areas to the north of the application site, and that the existing PTAL of 0 - 3 across the site is low, the proposed development would make significant financial contributions through the proposed Section 106 agreement (in agreement with TfL) to provide additional bus services, along with significant walking and cycling improvements to the nearby Stonebridge Park Station. It is considered that the proposed layout and scale of the development is acceptable and would provide a good standard of residential accommodation being achieved, and the applicants have demonstrated to both the Council and Transport for London that the proposed development would have an acceptable level of impact on the existing surrounding occupiers, while delivering much needed homes and employment opportunities.
- **Planning Obligations and Community Infrastructure Levy (CIL):** CIL liability is calculated at the time at which planning permission is granted. As such, the CIL liability specified within this report is based on current levels of indexation and is provided for indicative purposes only. The proposed Section 106 agreement is discussed in this report.

## RELEVANT SITE HISTORY

The below summarises the detailed planning history of the site since the inception of the Masterplan in 2018:

### Hybrid Planning Permission 18/0321: 28th September 2018

Hybrid planning application for the redevelopment of Northfield industrial estate:

1. *Outline planning permission for the demolition of existing buildings and structures on the site, all site preparation works and redevelopment to provide new buildings ranging from 35.75m AOD to 111.95m AOD in height, with a total floorspace (GEA) of up to 309,400 sq m (excluding basement up to 42,000 sq m GEA) to accommodate 2,900 homes (Use Class C3), business and storage and distribution (Use Classes B1a, B1c and B8), commercial (Use Classes A1, A2, A3, A4 and A5), community and leisure (Use Classes D1 and D2) including community centre and nursery, new basement level including energy centre, associated storage, cycle and vehicle parking, new vehicular accesses, associated highway works to Beresford Avenue, landscaping and creation of new public and private open space, ancillary facilitating works, various temporary meanwhile uses, interim works and infrastructure.*
2. *Full planning permission for demolition of existing buildings and structures on the site, all site preparation works and the development of Phase 1 (Buildings A, B, C and D ranging from 1 to 14 storeys in height) to comprise 400 homes (Use Class C3); 910 sq m (GEA) of business floorspace Use Class B1a); 1,290 sq m (GEA) of commercial floorspace (Use Classes A1, A2, A3, A4 and A5); and 1,610 sq m (GEA) of community and leisure floorspace (Use Classes D1 and D2), including a community centre and nursery; together with new basement level including energy centre, associated storage, cycle*

*and vehicle parking, new vehicular accesses, associated highway works to Beresford Avenue, landscaping and creation of new public and private open space, ancillary facilitating works, various temporary meanwhile uses, interim works and infrastructure.*

Hybrid permission 18/0321 is subject to 41 conditions attached to the decision notice and a Section 106 legal obligation.

### **Non-Material Amendment (ref. 19/0465): 7th March 2019**

Non-material amendment to the 2018 hybrid planning permission was granted for the following changes:

- An increase to the site wide total number of homes from 2,900 to 3,030 homes with a corresponding increase of residential floorspace of 12,239 sqm GEA;
- An additional increase in employment floorspace from 19,000 sqm GEA to 19,380 sqm GEA (+380 sqm GEA);
- An amendment to parameter plan ref. 31009-PL-212A increasing in the building height of Plot N by 5.85m and enlarging the building footprint to facilitate the design of the Generator; and
- An amendment to Condition 35 to limit individual units to no more than 3,125 sqm (GIA) of use class B1c and B8 floorspace.

### **Minor-Material Amendment (ref. 19/2732): 4th October 2019**

*Minor material amendment under Section 73 of the Town and Country Planning Act 1990 to vary the wording of condition 6 (outline approved drawings) to allow:*

- *An increase in the proposed parameter height for Plot E to a maximum between 86.60m AOD – 92.90m AOD*

*of Outline Planning Permission reference 18/0321 dated 28 September 2018 for Hybrid planning permission for the redevelopment of the former Northfields Industrial Estate (as per 18/0321).*

### **The Generator: June 2019**

The first reserved matters submission for the outline component of the Masterplan site comprises 'The Generator' which is located within part of Phase 4 of the development.

The Generator RMA was approved on 10th June 2019 (ref. 19/0925), for the following:

*Reserved matters application for a six-storey industrial building comprising of Use Class B1(c) (Light Industrial) and B8 (Storage and Distribution) floorspace, including associated ancillary B1a (office) floorspace, associated hard and soft landscaping, vehicular access and parking. The reserved matters being sought relate to scale, layout, appearance, access and landscaping for Plot N ('The Generator') pursuant to hybrid planning application 18/0321 dated 28/09/2018 as varied under non-material amendment application 19/0465.*

Located on the southern part of the Grand Union site, the Generator will provide 18,128m<sup>2</sup> GEA of B1a, B1c, B2 and B8 floorspace within a six-storey building.

### **Phase 2a (Blocks E-F) Reserved Matters: 20<sup>th</sup> December 2019**

An application for reserved matters was approved on 20th December 2019. The description of development is as follows:

*Reserved matters application pursuant to conditions 3 (Layout, Scale, Appearance, Access and Landscaping) and 2 (approved drawings and supporting documents) of hybrid planning permission*

*19/2732, dated 04th October 2019 for access, appearance, landscaping, layout and scale of Phase 2a comprising the construction of four buildings ranging from 8 to 18 storeys in eight providing 524 homes with private communal residential landscaped gardens, basement and podium residential car parking including associated storage, cycle and car parking; health centre (Use class D1); affordable workspace (within use class B); commercial space (A1 – A5 uses classes); associated plant, visitor car and cycle parking, refuse provision, public realm and open space, ancillary facilitating works, infrastructure and engineering works to the river bank.*

A summary of the RMA approval is set out below:

- 524 residential units; 37 x Studio (7%); 205 x 1 bed units (39%); 192 x 2 bed units (37%); 90 x 3 bed units (17%);
- 332 Market (63%); 115 Affordable Rent (22%) & 77 Shared Ownership (15%) units;
- A tenure split of 67% affordable rented homes and 33% shared ownership homes;
- 243sqm GEA of Use Class A; 420sqm GEA of Use Class B1a; and 826sqm GEA of Use Class D1.

### **Non-material amendment to Hybrid Planning Permission: 14th February 2020**

An application for a non-material amendment was approved on 14th February 2020. The description of the amendment is as follows:

*Non-material amendment to Hybrid Planning Permission 18/0321 as amended by 19/2732 to reflect amendments to the building heights, elevations, basement, internal layouts and mix of private homes in Phase 1 (Plots A-D).*

The amendments to the original Masterplan consent, as amended by further s73 applications, under this non-material application is set out below:

- Four 3-bedroom units converted to 2-bedroom homes; resulting in Phase 1 delivering x 53 3-bedroom units – a reduction of 1.4%;
- The overall unit mix is secured via Condition 14 of the parent permission and is on a site-wide basis rather than per phase. As this non-material amendment relates to Phase 1 only, it was considered reasonable that the remaining number of 3-bed units can be provided in later phases of development;
- Increase in heights of buildings A-C ranges from 0.24m-0.34m respectively and the increase in heights of the balustrades range from 0.10m-0.21m;
- Minor amendment to elevations (windows; pipes; louvres; metal railings);
- Minor amendment to the basement – reduction in floorspace of 374sqm and loss of 3 parking space; and the addition of a sprinkler tank; and
- Internal layout amendment to adjust the parking and servicing layouts of the podium level in buildings A and C, to allow for fire and smoke ventilation requirements.

### **Non-material amendment to Hybrid Planning Permission: 28th July 2020**

An application for a non-material amendment was approved (ref. 20/2084) on 28th July 2020. The description of the amendment is as follows:

*Non-material amendment to Hybrid Planning Permission 18/0321 as amended by 19/2732 to reflect alterations to internal layouts of ground floor to building D in Phase 1 (Plots A-D).*

A summary on the non-material amendments approved is as follows:

- 10m<sup>2</sup> decrease in A class Use;
- 172m<sup>2</sup> decrease in D class Use;
- 169m<sup>2</sup> increase in B class Use; and
- An increase of 13m<sup>2</sup> provided for plant, cycle parking and residential entrances.

## CONSULTATIONS

Initial neighbour consultation: 1289 consultation letters were sent to adjoining and nearby owners and occupiers. The application was also advertised in the press on 22<sup>nd</sup> October 2020 and site notices were posted on 26<sup>th</sup> October 2020.

A total of two public responses have been received, both of which have raised objections to the proposals.

The grounds of objections received refer to the following issues:

Comment	Response
<b>Design</b>	
Proposed heights of Blocks G, H and J will have visual impacts and be overbearing on the two storey dwellings of the residential properties to the north of Beresford Avenue and surrounding area.	<p>The proposed scale and massing of the development has been designed to respect the scale of housing along Beresford Avenue and the siting of built form provides generous separation with the tallest buildings integrated into the centre of the Site along the new linear park. Mid-scale buildings bridge between the lower massing of Beresford Avenue and the central marker buildings creating a coherent composition.</p> <p>The proposed buildings have been tested to ensure that there are no detrimental impacts on surrounding properties with regards to daylight and sunlight and overshadowing.</p> <p>The visual impacts of the proposals has been considered by the applicant through the Townscape and Visual Impact Assessment (TVIA), the TVIA concludes that no significant adverse effects have been identified. It is acknowledged that the character of the application site and wider site will change, however this is considered acceptable given its current condition. The design of the buildings will be high quality as demonstrated by Phases 1 and 2 and they will create a sympathetic interface with the adjacent residential area.</p>
<b>Heritage</b>	
The proposed heights of the buildings are likely to harm the setting of Listed Buildings and even any 'less than substantial' harm needs to be weighed in the planning balance.	The only listed building in the vicinity of the site is the Grade II listed Brent Viaduct, approximately 60m to the north east. The current context of the Brent Viaduct is dominated by major roads and a townscape of industrial character which lacks definition. Block R of the proposals would create a clear landmark feature at the eastern apex of the site closest to the Brent Viaduct; whilst taller than existing buildings in view it has a slender profile owing to its

	triangular form. Overall, the TVIA concludes that the definition and architectural variety added to the landscape by the proposals to have a beneficial effect.
<b>Affordable Housing</b>	
50% of new homes in the borough expected to be affordable.	The application is submitted under the London Plan Fast Track Approach. The Site is a de-designated SIL site which benefits from an Extant consent that has been implemented, and therefore the 35% affordable housing threshold applies. The proposal will deliver 35% affordable housing in line with this requirement.
<b>Commercial Uses</b>	
The proposals result in the demolition of three commercial units along Beresford Avenue, one of which provides a home to a very successful and viable company employing many staff. This is contrary to the objectives of the Wembley and Alperton Growth Area and impacts on current businesses need to be considered.	The impact of the loss of the three existing commercial units along Beresford Avenue has been considered within the Environmental Statement. Whilst demolition of these units would result in a loss of employment, the proposals overall will generate a net increase in employment through the end uses which is in accordance with the objectives of the Wembley and Alperton Growth Area. Furthermore the proposals will deliver high quality employment floorspace that will better meet business needs.

### Statutory consultees

#### **Old Oak and Park Royal Development Corporation (OPDC)**

No objection raised.

There was overall support for the principle of development for the original scheme (18/0321) and the proposed revised masterplan does not raise any new concerns. Confirmation is sought that additional social infrastructure demands arising from additional development will be addressed through proportionate increased contributions through CIL and planning obligations.

Officer response: ES confirms that any additional impact on education would be captured by CIL. Approximately £55m of CIL funding will be generated by the proposals.

The ES also confirms that the provision of the health centre in Phase 2 would meet the demand of healthcare facilities arising from the proposed development and no further mitigation is required, subject to continued provision of this within the section 106 agreement. Sufficient playspace is proposed by the revised proposals. Furthermore, a financial contribution towards improvements to Heather Park has also been secured under the extant planning permission.

#### **Canal and River Trust**

Habitat enhancement within the Grand Union Canal would be welcomed as part of the biodiversity mitigation for the proposed development. Brent to consider the use of CIL for towpath improvements arising from increase in use of the towpath by pedestrians and cyclists.

The Phase 3 proposals are some distance from the canal and whilst they would be visible, it seems unlikely that they would have a significant impact on the canal or its towpath, particularly as

Phase 2 forms a buffer to the canal. The impact of Phase 3 on the setting of the historic waterway is therefore minimal.

Officer response: the Grand Union Canal falls outside of the red line boundary of the Grand Union Revised Masterplan planning application. Notwithstanding this, the proposals will result in a significant biodiversity enhancement and biodiversity net gain on this site resulting from the substantial landscaping, incorporation of brown roofs and open space proposed (in comparison to the existing site which has limited ecological habitats and biodiversity value). This issue is addressed in more detail within the landscaping and biodiversity considerations of the report below.

The extant permission recognises the potential for impacts of the development on the Grand Union Canal and River Brent as well as the potential for enhancement arising from the proposed development. Mitigation measures are already proposed to ensure there is no harm to ecology. These would include avoiding harm to reptiles, managing invasive species, and consideration for the aquatic environment.

The extant permission also proposes works to restore the waterside edges of the site and significant areas of habitat creation proposed to be concentrated within the corridors of the River Brent and canal, including the Riverside Meadows area at the east. This mitigation is measured and controlled through condition 30 of the extant planning permission (and proposed under the new consent) which requires the submission of an Ecological Mitigation and Enhancement Plan.

### **Thames Water**

Unable to determine the waste water infrastructure needs of the application. Recommend that conditions are attached relating to foul water and surface water drainage infrastructure.

Officer response: This issue has been addressed by relevant conditions and informatives.

### **Greater London Authority (GLA)**

The GLA Stage 1 response states that in view of the evidenced, plan-led approach to SIL consolidation and release and the applicant's approved masterplan, the redevelopment of the site to provide a significant amount of housing is strongly supported. It is acknowledged that re-provision of employment floorspace has been robustly met by the extant consent (Phase 4a).

While the application is generally acceptable, the application does not fully accord with London Plan Policy although possible remedies are identified that could address this:

- **Affordable housing:** confirmed that the proposals meet the Fast Track Approach with a 35% affordable housing threshold. An early stage (delayed implementation) review is sought. Affordable rent units to be provided as London Affordable Rent.
- **Urban design:** whilst broadly supported, further information is sought on the ground floor layout of buildings within Phases 4b-7 (outline application). Provision of garden/buffer spaces between residential units and public realm is also sought, particularly along Beresford Avenue. And confirmation is required that floor to ceiling height for each residential unit is at least 2.5m.
- **Transport:** supported in strategic terms, subject to contributions towards consultation and implementation of a CPZ, Stonebridge Park station and bus improvements, and appropriately secured transport-related plans. Clarification is sought as to how cyclists would access the baseline level cycling parking in Phase 3.
- **Energy:** The CO<sub>2</sub> emissions for the detailed and outline, and residential and commercial elements are required to be disaggregated and re-submitted so that on-site reduction of carbon dioxide can be determined for each part of the application and domestic and

non-domestic elements separately.

Officer comments: The applicants have responded on all the above matters and, while there are some energy matters to be resolved, officers are satisfied that these issues have been sufficiently addressed to enable Members to determine the application. See relevant detailed considerations section for further discussion of these issues.

### **Sport England**

No objection raised.

### **Natural England**

No objection raised. Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

### **London Underground Infrastructure Protection**

No comment to make on the application.

### Internal consultees

### **Environmental Health**

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

### **Statement of Community Involvement**

A Statement of Community Involvement has been submitted with the application, setting out the public consultation and level of engagement undertaken before submission of the proposals, as required through the Localism Act (2011). The approach to engagement has been tailored to the nature of the development proposed. This has exceeded the minimum recommendations of the Brent SCI, and full details are provided within the submitted SCI and the Planning Supporting Statement.

The level of consultation with the local community built on that undertaken during the original Masterplan exercise, with letters sent to over 8,800 households, businesses, local councillors, MPs, community groups and GLA members. Consultation with local residents and the dedicated Community Liaison Group (CLG) has been ongoing since planning consent was granted in September 2018 for the original masterplan. This has included having a dedicated on-site community liaison officer for local residents and consultation on the Reserved Matters Application for Phase 2 of the Grand Union development with the CLG.

Six further CLG meetings took place between May 2020 and August 2020 in relation to the Revised Masterplan application, consisting of representatives from local organisations and other local residents, and one public exhibition held digitally along with digital drop-in sessions and feedback forms. Consultation with the community allowed for their involvement and input on how the Revised Masterplan can continue to bring about community benefits. The consultation ran largely remotely due to the COVID-19 pandemic and social distancing restrictions, however throughout the process, the project team remained available to local residents by email and phone. Various opportunities to meet virtually with the project design team were provided and where residents did not have internet access, materials were posted to them.

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



## **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 2016, Brent Core Strategy 2010 and Brent Development Management Policies 2016.

### **Regional**

#### **The London Plan 2016**

London Plan policies regarding housing supply, housing mix, affordable housing, density, children and young person's play, industrial land, urban design, access, sustainable energy and transport are applicable.

Mix of uses	London Plan
Housing	London Plan; Housing SPG; Housing Strategy; Affordable Housing and Viability SPG; Mayor of London Housing Zones
Industrial land	London Plan; Land for Industry and Transport SPG
Neighbourhoods:	London Plan; Play and Informal Recreation SPG
Shaping Neighbourhoods:	Character and Context SPG
Affordable housing	London Plan; Housing SPG; Housing Strategy; Affordable Housing and Viability SPG
Retail/town centre uses	London Plan; Town Centres SPG
Density	London Plan; Housing SPG
Employment	London Plan;
Urban design	London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG
Tall buildings/views	London Plan
Access	London Plan; Accessible London: achieving an inclusive environment SPG;
Sustainable development	London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy
Air quality	London Plan; the Mayor's Air Quality Strategy;
Transport	London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG
Parking	London Plan; the Mayor's Transport Strategy

#### **Emerging Local Plan**

On 21 December 2020, the Mayor sent a revised "Intend to Publish" (ITP) version of his new London Plan to the Secretary of State (SoS). This followed a letter from the SoS to the Mayor on 10 December 2020 which included a schedule of changes relating to the 11 directions issued in March 2020 and two further directions. The Mayor believes that the Intend to Publish London Plan addresses all matters as set out by the SoS. The SoS has until 1 February to consider the Plan and to decide whether to make any further directions.

### **Local**

#### **Brent Local Development Framework Core Strategy 2010**

CP1 Spatial Development Strategy  
CP2 Population and Housing Growth  
CP3 Commercial Regeneration  
CP5 Placemaking  
CP6 Design & Density in Place Shaping

CP8 Alperton Growth Area  
CP14 Public Transport Improvements  
CP15 Infrastructure to Support Development  
CP16 Town Centres and the Sequential Approach to Development  
CP17 Protecting and Enhancing the Suburban Character in Brent  
CP18 Protection and Enhancement of Open Space, Sports and Biodiversity  
CP19 Brent Strategic Climate Mitigation and Adaptation Measures  
CP20 Strategic Industrial Locations and Locally Significant Industrial Sites  
CP21 A Balanced Housing Stock  
CP23 Protection of existing and provision of new Community and Cultural Facilities

**Brent Development Management Policies Development Plan Document 2016**

DMP1 Development Management General Policy  
DMP2 Supporting Strong Centres  
DMP3 Non-Retail Uses  
DMP4A Shop Front Design and Forecourt Trading  
DMP7 Brent's Heritage Assets  
DMP9 Waterside Development  
DMP9A Managing Flood Risk  
DMP9B Off Site Water Management and Surface Water Attenuation  
DMP11 Forming an Access onto a Road  
DMP12 Parking  
DMP13 Movement of Goods and Materials  
DMP14 Employment Sites  
DMP15 Affordable Housing  
DMP18 Dwelling Size and Residential Outbuildings  
DMP19 Amenity Space

The Council is at a significant stage in reviewing its Local Plan. The draft Brent Local Plan was subject to examination in public during September and October 2020. The planning Inspectors requested some additional information alongside a consolidated schedule of modifications (to reflect discussions during the examination hearings). This information will be submitted to the Inspectors on 15 January. It is estimated that a final Inspectors report will be issued in June 2021, subject to further modifications, with adoption of the final Plan not likely until late Summer 2021.

Having regard to the tests set out in paragraph 48 of the NPPF it is considered by Officer's that greater weight can now be applied to policies contained within the draft Brent Local Plan.

Therefore, having regard to the tests set out in paragraph 48 of the NPPF it is considered by officers that greater weight can now be applied to policies contained within the draft Brent Local Plan. Relevant draft policies include:

DMP1 – Development Management General Policy  
BSWGA1 – Alperton Growth Area  
BD1 – Leading the way in good design  
BD2 – Tall buildings in Brent  
BD3 – Basement Development  
BH1 – Increasing Housing Supply  
BH2 – Priority Areas for Additional Housing Provision within Brent  
BH3 – Build to Rent  
BH5 – Affordable Housing  
BH6 – Housing Size Mix  
BH13 – Residential Amenity Space  
BSI1 – Social Infrastructure and Community Facilities  
BE2 – Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS)  
BE4 – Supporting Strong Centres Diversity of Uses

BHC1 – Brent’s Heritage Assets  
BHC3 – Supporting Brent’s Culture and Creative Industries  
BHC4 – Brent’s Night Time Economy  
BG11 – Green and Blue Infrastructure in Brent  
BG12 – Trees and Woodland  
BSUI1 – Creating a Resilient and Efficient Brent  
BSUI2 – Air Quality  
BSUI3 – Managing Flood Risk  
BSUI4 – On-site Water Management and Surface Water Attenuation  
BT1 – Sustainable Travel Choice  
BT2 – Parking and Car Free Development  
BT3 – Freight and Servicing, Provision and Protection of Freight Facilities  
BT4 – Forming an Access on to a Road

Other Material Planning Considerations include:

**Revised National Planning Policy Framework (NPPF) 2019**  
**Technical Guidance to the National Planning Policy Framework**  
**Planning Practice Guidance (PPG)**  
**Technical Housing Standards**

### **Brent Council Supplementary Planning Guidance and Documents**

SPD1 Brent Design Guide (2018)  
SPG3 Making an Access to a Road (2004)  
SPG13 Layout standards for access roads (2004)  
Alperton Masterplan (2011)

## **DETAILED CONSIDERATIONS**

### **Introduction and Structure of this Report**

1. The majority of the redevelopment of the site is applied in outline with all matters reserved. The outline development is set out within the submitted Parameter Plans, Development Specification document and Framework Design Code which establish the controls that would apply to the development. However, the application for Phase 3 of the site (i.e. Blocks G, H and J) is in full detail and is supported by full drawings and details.
2. Both elements of the scheme (those in outline and full) are accompanied by a suite of supporting reports, including an Environmental Statement; Design and Access Statement; Planning and Affordable Housing Statement; Transport Assessment and Travel Plans; Energy Statement; Sustainability Statement; Dynamic Overheating Assessment; Internal Daylight and Overshadowing Report; Statement of Community Involvement; Utilities Strategy Report; Demolition Method Statement; Framework Construction Method Statement and Logistics Plan; Operational Waste and Recycling Management Strategy; Ecological Baseline Reports; Tree Survey and Arboricultural Impact Assessment; Flood Risk Assessment; Drainage Strategy Report; Employment Strategy; and Fire Strategy.
3. The submitted drawings and reports have been considered and the views of officers and comments received in relation to this application have been summarised in this report.
4. The principal material considerations relevant to this application are as follows:
  - Principle of land uses; including the impact of the creation of residential accommodation on strategic industrial land
  - Housing considerations (Affordable Housing, dwelling mix and quality of accommodation)
  - Density

- Design and Heritage
- Landscaping, Open Space, Play Space & Trees
- Transportation & Highways
- Impact on neighbouring residential amenity
- Energy and sustainability
- Accessibility
- Representations received
- Planning Obligations and Community Infrastructure Levy (CIL)

## **Land Use Principles**

### **Loss of industrial floorspace and SIL de-designation**

5. As outlined in earlier sections of the report, the majority of the site (with the exception of a small area at the north-west) forms part of the Park Royal Strategic Industrial Location (SIL) (8.32 Ha). The north-west part of the site that is not SIL land is a Local Employment Site (0.84 Ha).
6. The original Masterplan was approved in September 2018, enabling the release of this SIL land (and the Local Employment Site) from these allocations, in order to intensify the site through a mix of uses including industrial intensification. As outlined in earlier sections of the report, the applicant has implemented this planning permission and it is currently building it out, with the construction of Phase 1 currently underway.
7. The scheme approved in September 2018 ensured a minimum of 17,581 sqm of replacement employment/industrial floorspace (i.e. use classes B1a, B1c and B8), which has increased to 19,680sqm as a result of subsequent material and non-material amendments (refs. 19/0465 and 20/2084) and reserved matters applications for Phases 1 and 2, as well as 'The Generator' (Phase 4a).
8. 'The Generator' reserved matters application was approved by the LPA in June 2019 (ref. 19/0925). The hybrid planning permission requires that this building approved in Plot N shall be subdivided into individual units of no more than 3,125sqm (GIA) of B1(c)/B8 floorspace unless otherwise agreed in writing by the Local Planning Authority. In this way, the council ensures that the building cannot be occupied by a single operator, and can ensure that the aims of the applicant's Employment Strategy can be facilitated effectively, with a maximum cap on unit sizes.
9. Furthermore, the s106 agreement (Schedule 5) prevents the applicant from making a material start on Phase 4 until the Generator has been constructed and is ready and available for Occupation (but for the avoidance of doubt this shall not require the Owner to fit out the Generator). This would be secured again under the legal agreement which would form part of the revised Masterplan consent.
10. Since approval of the original Masterplan, draft Local Plan Policy BE2 (Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS)), as well as the Draft Policies Map which identifies SIL boundaries, now carries some weight. Also relevant is Site Allocation Policy BSW57: Northfields, which sets out the following requirement:
 

*"Consistent with planning permission 18/0321 due to the site's historic SIL designation a minimum of 17,581 sqm of employment floorspace must be re-provided as part of the development"*.
11. This policy sets out that Northfields east of the Grand Union Canal and north of the River Brent (Grand Union) should be removed as a SIL designation on the policies map due to the original Masterplan. The remainder of the eastern Site to the south of the River Brent is to be retained

as SIL, which is consistent with London Plan policy and is regarded as appropriate for intensification.

12. The GLA have confirmed in their Stage 1 response that they are satisfied with the proposals in this regard. They state the following in paragraphs 21 and 22 of their report:

*“As established in the consented scheme, the introduction of residential units on the application site is supported given the plan-led approach to industrial land supply within Brent Council’s adopted Local Plan and the applicant’s master planning approach in line with Policy E5 of the Intend to Publish London Plan. In addition, the Council’s emerging plan contains a strategy for intensifying industrial capacity on locally significant industrial sites.*

*In terms of the re-provision of employment floorspace in line with Policy E7 of the Intend to Publish London Plan, this is being delivered in Phase 4a and its delivery has already been robustly secured via the legal obligation. This floorspace will be an improvement, both qualitatively and quantitatively, on the existing industrial floorspace and will ensure that the site delivers significantly greater employment densities.”*

13. In light of the above, and the clear policy intention to de-designate the remainder of the Masterplan site as SIL/ Local Employment Land, the loss of this industrial floorspace is supported both by Brent and Mayoral policy (adopted and emerging).

#### Meanwhile Uses

14. Draft London Plan policies H4 and HC5 support opportunities for the provision of meanwhile uses on sites in order to make efficient use of land and to stimulate vibrancy, vitality and diversity with a particular focus on cultural and creative activities. The inclusion of meanwhile uses is supported by the OPDC. The provision would help to provide employment opportunities and activity within the site from an early stage, and would support local businesses, including start-up businesses and entrepreneurs, until more permanent space is delivered on the site.
15. The original Masterplan included the provision of a temporary ‘Creative Quarter’ that would provide small, flexible workspaces offering seed bed units or incubator space for start-up businesses and entrepreneurs. The ongoing COVID-19 pandemic has delayed delivery of this space, however there remain a number of conditions and/or clauses within the legal agreement to ensure full details of the meanwhile use(s) are secured. This continues to be important given the lengthy construction period (anticipated to still be another 19 years), enabling vacant parts of the site to be re-used and activating these spaces for early occupants of Phases 1 and 2 of the development, thereby contributing to the wider regeneration of this part of Alperton. The requirement for the meanwhile use would form part of any eventual legal agreement pursuant to this application.

#### Provision of residential Accommodation (Use Class C3)

16. The London Plan identifies a minimum target for Brent to provide 15,253 new homes between 2015 and 2025; an annual requirement of 1,525 homes. However, the ITP London Plan looks to significantly increase housing delivery across London and identifies an increased target for Brent to deliver 23,250 new homes between 2019 and 2029, an annual requirement for 2,325 homes.
17. The application site is in the Alperton Housing Zone, an area prioritised for accelerated housing delivery and where at least 3,213 new homes were envisaged when the area was designated. Core Strategy Policy CP1 also focuses housing development in five growth areas, including the Alperton Growth Area.
18. The consented scheme (including various amendments to the original consent) proposed 3,030 residential units, and of this total 924 units have been secured via detailed planning

consent (ie. in Phases 1 and 2a). Phase 1, with 400 units, has commenced and will be completed within the next 24 months. The revised Masterplan would deliver 2,426 units, in addition to the 924 units already approved in detail, representing a net increase of 320 units on the consented scheme and this continues to be strongly supported, given it would be equivalent to more than 10% of the minimum housing target for Brent required to 2029 as set out in the Intend to Publish Draft London Plan.

19. The proposals would continue to make an important contribution to meeting the identified need and relevant targets for housing in Brent. The development would further support the regeneration of both this previously developed site, and the wider Alperton area by delivering enhancements that would encourage further investment in the local area.
20. As such, the delivery of the proposed homes as part of the residential led, mixed use development of the site is considered to be a significant benefit and is in accordance with Brent and London Plan policy and the national emphasis on delivering a wide choice of housing to respond to housing need as highlighted within the revised NPPF.

#### Community and Leisure (Use Classes F1 and E(d)) (previously D1 and D2)

21. The original Masterplan was approved with a total provision of up to 2,500sqm of flexible community floorspace (D1 non-residential institutions and D2 assembly and leisure). 1,465 sqm of community and leisure uses has been delivered within Phase 1 within the ground floor level of Buildings C and D, with Building C accommodating a nursery (248sqm) and a community centre (299sqm), and the remaining floorspace provided within Building D. These are significant benefits which support a range of local needs and accommodate both the existing community and future occupiers of the development, thereby meeting Core Strategy Policy CP5.
22. A remaining 686 sqm of flexible commercial floorspace would be provided within the revised Masterplan, and it is considered that this would include the ability to use for D1 and D2 purposes. This ensures there is further flexibility and capacity to accommodate additional community space should it be required as the site itself, and aspirations of the community, evolve. The remaining floorspace therefore has the potential to further support the regeneration of the site and Alperton, and is supported in accordance with Brent and Mayoral policy.
23. The community uses previously approved would still be delivered, and would still form part of the original masterplan consent, including the nursery and community centre.

#### Healthcare facility

24. The original Masterplan secured a 800sqm health care facility within the development, following discussions with Brent's Clinical Commissioning Group (CCG) during the course of the application, and their feedback that a new facility would be required in the area. An obligation was required under the signed section 106 agreement that this would be delivered prior to first occupation of the first 600 residential units, with the final quantum of floorspace, specifications of the fit out and commercial terms to be agreed with the CCG, unless otherwise agreed by the Council.
25. Officers understand that attempts have been made by the applicant to agree delivery with the CCG during and since the implementation of early phases of the scheme, but although there are ongoing discussions, no agreement has been reached to date. Officers have consulted the CCG formally on this planning application, but no response has been received to date.
26. Officers consider that, since there is no information to suggest that demand for a healthcare facility has diminished since the original permission, the same requirement for a health facility

should be secured as part of the revised section 106 agreement under this new permission. This would allow for further discussions to take place, and for detailed plans and commercial terms to be agreed post-decision.

27. On this basis, it is considered that the revised Masterplan would still have the potential to deliver an adequate healthcare facility in order for an existing surgery to relocate to the Northfields site, and expand to accommodate the additional patients the proposed development would create. This will be secured under the legal agreement which would accompany any eventual decision.

### Town Centre Uses

28. The original Masterplan included a maximum of 2,300sqm commercial floorspace (excluding 'employment generating' floorspace) across the site. This space would be flexible and would provide accommodation suitable for a range of occupiers and uses, including former Use Classes A1, A2 and A3 (which have now been incorporated into Class E under the changes to the Use Class Order in September 2020), and A4 and A5 (which are now incorporated into Sui Generis uses). 1,280sqm of this space was provided within Phase 1, located within the ground floor level of Building D, with a further 243 sqm provided within Phase 2.
29. A further 686 sqm of flexible commercial floorspace would be provided across the scheme, with the majority of this (616 sqm) provided within future phases of the revised Masterplan. However, a 72 sqm commercial unit would be provided within Phase 3, located at the ground floor of Block G, and provides an element of active frontage to this block.
30. There has been no in-principle shift in policy position with regard to the proposed provision of commercial uses in this location. The site is not within a town centre where commercial and retail uses should generally be focussed. However, the scale and nature of the uses are appropriate to support the development. Although no Town Centre Uses Statement has been submitted with the application, officers consider there would continue to be no adverse impact on other nearby centres or on investment in the area through the inclusion of the commercial floorspace, given there would be no material uplift in the overall floorspace provision within the revised Masterplan. Furthermore, given the need for these uses to support the wider development on the site, there would be no sequentially preferable locations to accommodate the proposed commercial floorspace, and the sequential test required in accordance with the NPPF would be satisfied.
31. The proposed commercial space to be provided within Phase 3 and further phases of the revised Masterplan continues to be appropriate to the scale and nature of the proposed development. It would support the existing and new community by providing services that would meet day-to-day needs, without impacting detrimentally on other local centres. As such, it would reduce the need for the community to travel to access services, and would support the creation of a sustainable community and place. The inclusion of commercial space within the development is therefore supported in accordance with national and local policy.
32. Officers consider that, while a flexibility of potential uses can continue to be offered within the commercial units, these should be restricted to specific Class E, F.1 and sui generis uses given the changes to the Use Class Order which came into effect in September 2020. An amended condition is attached to this effect.

### **Affordable Housing**

#### Adopted affordable housing policy

33. London Plan policy 3.12 requires boroughs to seek the maximum reasonable amount of affordable housing, taking account of a range of factors including local and regional requirements, the need to encourage rather than restrain development and viability. The

policy requires boroughs to take account of economic viability when negotiating on affordable housing, and other individual circumstances.

34. Brent's adopted local policy (CP2 and DMP15) requiring affordable housing requirements for major applications stipulates that schemes should provide 50% of homes as affordable, with 70% of those affordable homes being social or affordable rented housing and 30% of those affordable homes being intermediate housing (such as for shared ownership or intermediate rent). The definition within DMP15 allows for affordable rented housing (defined as housing which is rented at least 20% below the market value) to be an acceptable form of low cost rented housing, which is consistent with the NPPF definition of affordable housing. The policies allow for the reduction in the level of Affordable Housing (below the 50 % target) on economic viability grounds. This is discussed in more detail later in this report.

#### Emerging affordable housing policy

35. The emerging London Plan (Publication Version) has been subject to examination and the associated affordable housing policies (H4, H5 and H6) are now given greater weight. These policies establish the threshold approach to applications where a policy compliant tenure mix is proposed\*, where viability is not tested at application stage if affordable housing proposals achieve a minimum of:

- 35 % Affordable Housing; or
- 50 % Affordable Housing on industrial land\*\* or public sector land where there is no portfolio agreement with the Mayor.

*\* other criteria are also applicable.*

*\*\* industrial land includes Strategic Industrial Locations, Locally Significant Industrial Sites and non-designated industrial sites where the scheme would result in a net loss of industrial capacity.*

36. The policies set out the Mayor's commitment to delivering "genuinely affordable" housing and the following mix of affordable housing is applied to development proposals:

- A minimum of 30% low cost rented homes, allocated according to need and for Londoners on low incomes (Social Rent or London Affordable Rent);
- A minimum of 30% intermediate homes;
- 40% to be determined by the borough based on identified need.

37. When interpreting these policies, the tenure mix set out in Brent's adopted policies (70:30 ratio of Affordable Rent : Intermediate) and Brent's emerging policies (70:30 ratio of London Affordable Rent : Intermediate) provide clarity on the tenure of the third category (40 % to be determined by the borough). This means that this element of Affordable housing mix should be provided as Affordable Rented homes.

38. Brent's emerging local plan policy (BH5) is similar to DMP15 in the adopted plan, but sets a strategic target of 50% affordable housing while supporting the Mayor of London's Threshold Approach to applications (policy H5), with schemes delivering at least 35% (or 50% on public sector land / industrial land and that propose a policy compliant tenure split) not viability tested at application stage. Brent Policy BH5 sets a target of 70% of those affordable homes being for social rent or London Affordable Rent and the remaining 30% being for intermediate products. This split marries up with the Draft London Plan H6 policy by design, with Brent having considered that the 40% based on borough need should fall within the low cost rented homes category, bringing Brent's target split across both emerging policies as 70% for low cost rented homes (Social rent or London Affordable Rent) and 30% for intermediate products.

39. Brent's draft Local Plan has yet to be examined by the Planning Inspectorate and as such the



adopted DMP15 policy would carry considerably more weight than the emerging policy at present. The draft London Plan is at a more advanced stage (being at Publication Stage) than Brent's emerging Local Plan and has been subject to comments from the Planning Inspectorate, and it can therefore be considered that this draft policy carries reasonable weight at this stage.

#### Adopted position on the extant Masterplan and Phase 1/ 2a delivery

40. The extant scheme was agreed with 35% of the housing to be Affordable (on a habitable room basis), at a 70/30 split in favour of Affordable rent (at 80% of market rent, capped at Brent Housing Benefit levels).. This was following the submission of a Financial Viability Appraisal (FVA) which indicated that 35% is the maximum reasonable proportion of affordable housing that can be achieved on site. Relevant clauses within the section 106 agreement ensure that at least 35% of affordable housing (on a habitable room basis) is delivered within each residential phase of the development, with the exception of Phase 1, under which a minimum of 28.9% affordable housing was agreed on a habitable room basis.

41. Phases 1 and 2a combined will deliver 33.2% affordable housing on a habitable room basis. A full breakdown by size and tenure is provided in the table below:

		Market		Intermediate		Rented		Total	
		Number	Hab Rooms	Number	Hab Rooms	Number	Hab Rooms	Number	Hab Rooms
Phase 1 (Plots A to D)	Studio	50 (17%)	50 (7%)	5 (23%)	5 (8%)	0 (0%)	0 (0%)	55 (14%)	55 (5%)
	1 Bed	60 (21%)	120 (16%)	3 (14%)	6 (10%)	31 (34%)	62 (25%)	94 (24%)	188 (18%)
	2 Bed	119 (42%)	357 (47%)	8 (36%)	24 (41%)	58 (63%)	174 (70%)	185 (46%)	555 (52%)
	3 Bed	57 (20%)	228 (30%)	6 (27%)	24 (41%)	3 (3%)	12 (5%)	66 (16%)	264 (25%)
	<b>Total</b>	<b>286</b>	<b>755</b>	<b>22</b>	<b>59</b>	<b>92</b>	<b>248</b>	<b>400</b>	<b>1,062</b>
Phase 2 (Plots E and F)	Studio	29 (8%)	29 (3%)	8 (10%)	8 (5%)	0 (0%)	0 (0%)	37 (7%)	37 (3%)
	1 Bed	125 (38%)	250 (28%)	46 (60%)	92 (54%)	32 (28%)	64 (19%)	203 (39%)	406 (29%)
	2 Bed	119 (36%)	357 (41%)	23 (30%)	69 (41%)	52 (45%)	156 (45%)	194 (37%)	582 (42%)
	3 Bed	59 (18%)	236 (28%)	0 (0%)	0 (0%)	31 (27%)	124 (36%)	90 (17%)	360 (26%)
	<b>Total</b>	<b>332</b>	<b>872</b>	<b>77</b>	<b>169</b>	<b>115</b>	<b>344</b>	<b>524</b>	<b>1,385</b>

#### Phase 3 – proposed affordable housing

42. 137 of the 439 units proposed with Phase 3 would be offered as affordable, equating to 31.2% by number, and 35% by habitable room. A breakdown of these units by size and tenure is

shown below:

Tenure	Studio	1 Bed	2 Bed	3 Bed	4 Bed	Total
Private	58	87	109	48	0	302
Affordable Rent	0	24	39	30	5	98
Shared Ownership	3	19	15	2	0	39
<b>Total</b>	<b>61</b>	<b>130</b>	<b>163</b>	<b>80</b>	<b>5</b>	<b>439</b>

Revised Masterplan – proposed affordable housing

43. Phases 4b-7 would deliver a further 1,987 units, with 726 of these as affordable, equating to 36.5% by total number. The indicative affordable housing mix by size and tenure is set out below:

Units	Affordable Rent		Shared Ownership	
	No.	%	No.	%
Studio	0	0	37	13%
1 bed	103	23%	119	43%
2 bed	227	51%	119	43%
3 bed	115	26%	3	1%
4 bed	3	1%	0	0%
Total	448	100%	278	100%

44. The above tables demonstrate that 35% affordable housing would be delivered both within Phase 3 itself and within the revised Masterplan, which is in line with what was previously approved and secured under the section 106 agreement. Although a Financial Viability Appraisal (FVA) was submitted and robustly interrogated under the original Masterplan, no FVA has been submitted under this application. Officers acknowledge that this would not fully accord with emerging London and Local Plan policies, which seek 50% affordable housing on former industrial land in order to meet the Fast Track Route (i.e. no further viability testing required).

45. However, significant weight is placed on the GLA's Stage 1 response on this issue. They comment that whilst the agreed industrial land floorspace re-provision does not amount to a 65% plot ratio as required by Policy H5, in this case it is noted that the site is subject to an extant, and substantially implemented, planning permission for residential-led development delivering 35% affordable housing. This is a material consideration which leads officers to conclude that the site's previous industrial land designation is no longer relevant to the Fast Track Route threshold requirement.

46. The GLA therefore accept that in this instance that the scheme can follow the Fast Track Route with a 35% threshold, subject to an early stage review secured within the section 106 agreement, and the applicant demonstrating that it has engaged with Registered Providers and that the use of grant funding to increase the level of affordable housing has formed part of these discussions. Council officers agree with this approach, and an early stage review mechanism would continue to be secured within the section 106 agreement.

47. Also of relevance is Policy H6 of the Publication London Plan, which states that the tenure split of affordable housing should comprise at least 30% low-cost rent (social or London Affordable Rent), at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), with the remaining 40% determined by the borough as low-cost rented homes or intermediate based on identified need. The extant Masterplan secures a policy compliant

affordable housing mix of 70% affordable rent: 30% intermediate, however this did not secure the affordable element at London Affordable Rent levels in line with the strict definitions set out within the Mayor's Affordable Housing SPG and the emerging policy. The extant consent was granted under the current policies which required provision of Affordable Rent rather than London Affordable Rent as required by the emerging policies. Nevertheless, the extant scheme is a significant material planning consideration which needs to be afforded appropriate weight in the consideration of this revised application.

48. On balance, officers consider it appropriate to demand that the requirement for London Affordable Rented units is applied proportionately to the 320 unit uplift over the extant permission(s), rather than the entire new outline consent. This would equate to approximately 34 units (84 habitable rooms), which represents 30% of the affordable housing component of the additional 320 units provided in phases 4b – 7, and this would be secured within the section 106 agreement. It is important to note that the exact number of London Affordable Rented units/ habitable rooms to be provided would only be confirmed once detailed proposals are provided at Reserved Matters stage. The GLA have also commented that while there is a presumption that the 40% per cent to be decided by the borough will focus on low-cost rent, however in some cases a more flexible tenure may be appropriate, for example due to viability constraints or to achieve mixed and inclusive communities. It is considered that by applying the requirement for low-cost units to the uplift, an appropriate degree of flexibility is being demonstrated.

49. In summary, subject to the section 106 agreement terms being secured as set out above, the revised Masterplan would continue to deliver a significant and policy-compliant level of affordable housing in the local area as part of the wider benefits of the scheme and would provide a range of products resulting in choice and a balanced community, supported by Brent and Mayoral policy.

## Housing Mix

50. Policy CP21 of the Brent Core Strategy seeks to maintain and provide for developments to provide a balanced housing stock by ensuring that new housing appropriately contributes an appropriate range and mix of self-contained accommodation types and sizes, including family sized accommodation on suitable sites providing 10 or more homes. Policy CP2 states that at least 25% of new homes across the borough should be family sized (3 or more bedrooms). London Plan Policy 3.8 requires different sizes and types of dwellings to meet different needs and Policy 3.11 states that within affordable housing provision, priority should be afforded to family housing.

51. Phases 4b-7 of the revised Masterplan would provide the following breakdown of unit types:

	Market		Intermediate		Rented		Total	
	Number	Hab Rooms	Number	Hab Rooms	Number	Hab Rooms	Number	Hab Rooms
Studio	81	81	37	37	0	0	118 (6%)	118 (2.1%)
1 Bed	383	766	119	238	103	206	605 (30.4%)	1,210 (21.5%)
2 Bed	416	1,248	119	357	227	681	762 (38.3%)	2,286 (40.6%)
3 Bed	381	1,524	3	12	115	460	499 (25.1%)	1996 (35.5%)
4 Bed	0	0	0	0	3	15	3 (0.2%)	15 (0.3%)
Total	1,261	3,619	278	644	448	1,362	1,987	5,625

	(63.5%)	(64.3%)	(14%)	(11.5%)	(22.5%)	(24.2%)		
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52. Within Phase 3, the proposed housing mix is:

	Market		Intermediate		Rented		Total	
	Number	Hab Rooms	Number	Hab Rooms	Number	Hab Rooms	Number	Hab Rooms
Studio	58	58	3	3	0	0	61 (13.9%)	61 (5.3%)
1 Bed	87	174	19	38	24	48	130 (29.6%)	260 (22.5%)
2 Bed	109	327	15	45	39	117	163 (37.1%)	489 (42.3%)
3 Bed	48	192	2	8	30	120	80 (18.2%)	320 (27.7%)
4 Bed	0	0	0	0	5	25	5 (1.2%)	25 (2.2%)
Total	302 (68.6%)	751 (65%)	39 (9.1%)	94 (8.1%)	98 (22.2%)	310 (26.9%)	439	1,155

53. As the above tables demonstrate, the development would adequately provide for a varied range of unit sizes, including a significant proportion of family sized (3-bedroom or more) homes both across the outline Masterplan and specifically within Phase 3. Officers place weight on the fact that a number of 4-bedroom homes would be provided within Phase 3 and later phases of the scheme, and these would be provided exclusively within the affordable rented element, which is a significant benefit given the demand for low-cost rented larger family homes within the Borough.
54. Although there are a lower number of 3-bed homes at an intermediate level both within Phase 3 and within later phases of the revised Masterplan, officers consider that there are known affordability issues with 3-bedroom intermediate homes whereby those homes are often not affordable for shared ownership purchasers. However officers have requested that two intermediate 3-bed units are provided within Phase 3, at the expense of studio and two-bed units. The lower proportion of three bedroom intermediate homes is considered to be acceptable on balance. Overall, it is considered that the development achieves the maximum that can realistically be attained in the market without fundamentally undermining other local plan policy outcomes and objectives referred to in this report and would be in accordance with Mayoral policy. As such it is considered an acceptable mix of dwelling sizes is proposed.

### **Jobs**

55. The Core Strategy recognises that mixed use redevelopment, including within growth areas, can help to deliver jobs for local people and that job opportunities should be supported alongside population growth.
56. The original Masterplan approved commercial, employment-generating floorspace of up to 19,000 sqm, predominantly in the form of B1c (now E(g)(iii)) and B8 uses which have either been delivered within Phase 1 of the development, or will be delivered within Phase 2 (Plots E and F) and the bulk of it (over 18,000 sqm) within the Generator building (Phase 4a). These phases fall outside the scope of this planning application, and therefore a remaining 686 sqm of commercial floorspace would be delivered within Phases 3-6.
57. Under the original Masterplan, the submitted Environmental Statement estimated that under a 'worst case' scenario, 423 jobs would be provided on the site, although the development is

expected to support closer to approximately 650 jobs on completion. The vast majority of these jobs would be created by the industrial and commercial uses either already provided or under construction, and falling outside the scope of this application.

58. However it is anticipated that 40 Full Time Equivalent (FTE) jobs would be provided as part of the remaining commercial and retail uses to be provided, with a further 350 temporary jobs per annum over the duration of the estimated 19-year construction period for the revised Masterplan. Given the long construction period, the construction jobs would continue not to be transient opportunities.
59. As discussed within the report for the original Masterplan, the accommodation to be delivered within the Creative Quarter and early phases of the scheme would provide a range of modern, flexible workspace and therefore would support the viability and growth of local businesses, and as a result encourage the retention of SIL land to the south of the site and the local economy, and there would be further positive indirect and multiplier effects within the local economy. This would continue to be the case as part of the revised Masterplan.
60. On this basis, the revised Masterplan would continue deliver a significant number of new jobs which is welcomed, and is considered to accord with Brent and Mayoral policy.

## **Urban Design – revised Masterplan**

### Key principles

61. The application proposes redevelopment of the previously developed, and more recently under-developed site. As with the original Masterplan, a Framework Design Code has been submitted with this application which sets out the intended form, scale and character of the buildings and open spaces which would be brought forward within the revised Masterplan. As with the original consent, the site is at the gateway to the Alperton Growth Area and is within the Alperton Housing Zone. The continued re-development of this site is considered to be key to the transformation of the site and driving the regeneration sought for the area.
62. The original Design Code was informed by Design Reviews with CABE (now the Design Council), as well as pre-application discussions with both the GLA and the Council, and the masterplan principles established under this Design Code continue to be reflected in the updated document. As outlined in earlier sections, the revised Masterplan would benefit from approximately 15% more open space across the site than the original consent, which is considered a significant benefit of this amended application.
63. The Design Code sets out how the revised Masterplan has been centred around the provision of high quality open space and landscaping, with a series of interrelated but distinctive character areas within the masterplan, which have been identified by the opportunities and constraints created by the site and its wider context. The Design Code provides detail on how each of these character areas should be addressed in terms of land use, landscape and public realm, massing, materials, access and movement.
64. This emphasis on designing the built form around the landscaping is an approach which is strongly supported by officers, and would continue to deliver a mixed use development that makes effective use of the site to deliver growth and a range of benefits to the local area as considered further below.

### Land use

65. As outlined above, the revised Masterplan would continue to deliver a mixed-use development, with a focus on residential components of the scheme given the significant proportion of flexible commercial and community floorspace which would be provided in early phases. However the mix of uses varies across the site, with ground floor activities reflecting the

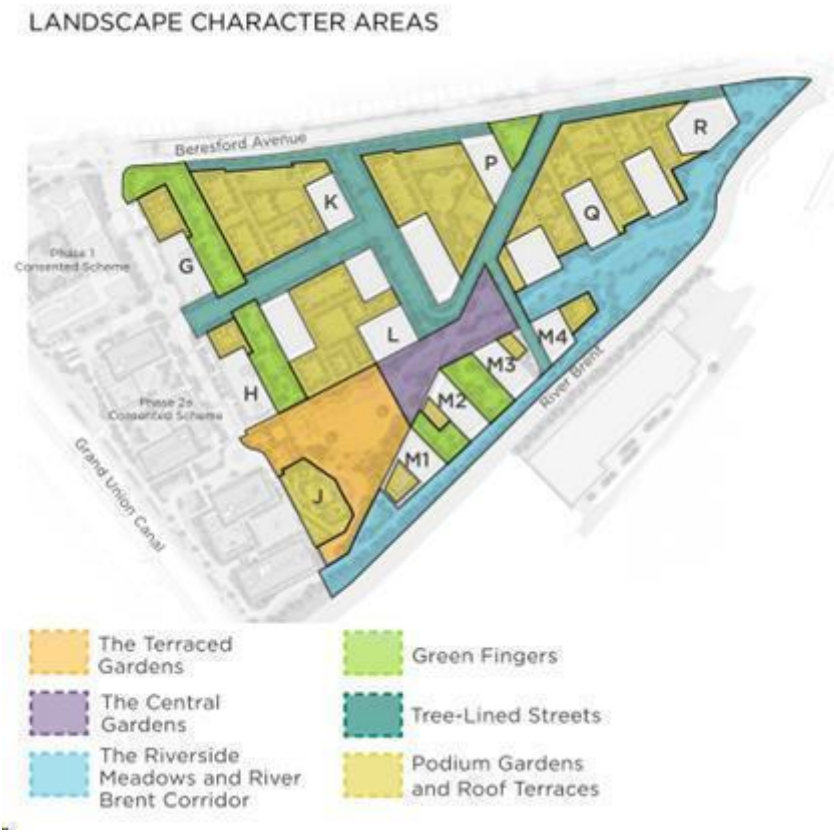
character of each area.

66. Along the northern edge of the site fronting Beresford Avenue, Blocks K and P, residential development should face the existing homes to the north. Residential development should also be provided on the upper floors. Located close to Stonebridge Park station, to the east of the site, Block R shall contain commercial space at ground floor and residential accommodation above.

67. The remaining blocks along the Riverside Meadows and Central Gardens, Blocks L, M and Q, shall be predominantly residential although there may be some opportunities for more non-residential ground floor uses such as community/commercial space where appropriate. This will be reviewed at reserved matters stage.

Landscaping and Public Realm

68. Full details of the proposed landscaping strategy are provided in later sections of the report, however as outlined above, a high quality landscaping scheme is at the heart of the revised Masterplan, with five distinctive character areas being created, as shown below:



69. As the above illustration shows, these character areas would knit together to form high quality landscaping and open space both for future occupiers and the wider community. At the heart of the site is the 'Central Gardens' area, which would provide direct visual connection with the Grand Union Canal, integrating with the new piece of public realm adjacent to the canal which has already been approved under early phases. This space be surrounded by a mixture of residential, commercial and community uses, with this layout helping to create a new canalside quarter within the site. It would also provide a direct connection from the canal at the west towards Stonebridge Park.

70. The proposals include a landscaped edge along the River Brent that will provide access to the waterside, and promote walking, cycling and opportunities for biodiversity through restoration of the natural landscape. There would be further improvements to the canal frontage at the south

and west of the site, with additional pedestrian links, civic space and canal edge restoration works.

71. Around these areas of public realm, the development proposes a hierarchy of streets forming a network that would improve permeability and provide connections with the existing neighbouring residential communities.

### Massing

72. With regard to massing, the key principle has been to ensure an appropriate shift in scale and height from the established, low-rise suburban character to the north, with the main taller buildings to the south and west, nearer to the Canal and River Brent.

73. Heights rise within Building Q (a maximum of 24 storeys) approaching the east of the site opposite the Trading Post. A marker building, Building R (a maximum of 28 storeys), at the eastern gateway is located on the approach from Stonebridge Park station and it is considered that this would create a sense of arrival. The large open space of the Meadows and Gardens provides an opportunity for height located away from existing residents. Two further marker buildings are proposed in Buildings L and Q, whilst the Block adjacent to the River Brent, M, would be a maximum of 17 storeys.

74. Whilst the proposed heights across the site are significantly taller than the existing (or former) buildings and the neighbouring residential properties, the distribution of height and scale across the site would respond sensitively to the local area and would not appear excessive or overbearing, while a high quality of architecture would provide for visual interest. The site forms part of the eastern Core region of the Alperton Tall Building Zone, as set out within Brent's Tall Building Strategy (March 2020), which informs Brent's emerging Local Plan. Heights of up to 26 storeys are considered appropriate within this area; however the particularly good quality of design proposed by Building R, and its relationship in terms of scale and massing with its wider context, ensures that a further increase in height would be justified here. Together with the quality of the layout of development, the height and scale of buildings proposed is considered to be broadly acceptable, is supported by the GLA and the Design Council Review Panel, and would optimise housing output and the provision of open space on the site.

### Materials and Design

75. The Framework Design Code establishes a simple façade treatment and limited palette of materials focussed on high quality brick which would complement the surrounding context and reflect the historic context of the Site and Canal. While appearance and landscaping are reserved matters for the outline application, the development is designed to ensure a complementary material and colour palette would also be used for all buildings. For example brick would be used adjacent to existing houses and to reflect the industrial quality characterised by the historic buildings along the canal and Alperton Station.

76. The material selection would also create a sense of longevity and permanence, adopting a coherent approach while ensuring there is a distinction to each building using different elevational treatments and textures. This variation helps to provide an identity for the development, and create a strong sense of place. All materials used would be durable and robust to minimise levels of maintenance, with further details of materials proposed would be secured by condition.

### Access and Movement

77. The revised Masterplan would continue to improve permeability and public access through the site, connecting existing residential areas to the north and west of the site to the canal and river, and creating improved links to public transport nodes. At the heart of the access and movement strategy is the aim to prioritise pedestrians and cyclists and ensure that vehicular access is limited. Primary and secondary vehicular routes will allow for refuse vehicle access whilst further controlled access is provided for servicing and emergency vehicles. Two vehicular access from Beresford

Avenue, with one primary access point and one emergency access point only. Continued provision is made for a bridge across the River Brent to connect the two parts of the site.

78. The main pedestrian access at the west part of the site connects to the existing north-south street pattern to the north side of Beresford Avenue, while another pedestrian and cyclist access point at the east side would connect with Heather Park Drive and the route to Stonebridge Park station. Improvements to the walk/cycle route to and from Stonebridge Park station are also proposed. Further improvements will be made to Beresford Avenue which will enhance the environment for pedestrians and cyclists and improve traffic flow.

#### Townscape and Views, including the Setting of Heritage Assets

79. The Environmental Statement includes a Townscape and Visual Impact Assessment (TVIA), which has been updated to reflect changes in building heights proposed across the revised Masterplan, the change to the townscape as a result of the construction of Phase 1, and the detailed submission as part of Phase 3. The Visual Impact Assessment was carried out to identify and mitigate any potential visual harm that may occur as a result of the proposed development, and where there is any identified harm remaining provide a detailed justification as to why it is acceptable. The assessment concludes that on completion, the effects of the development would be neutral or beneficial, with significant improvements particularly close to the site.

80. The TVIA sets out that there are no nationally or locally designated built heritage assets on the site, although nearby the Ace Café is a locally listed building and the Brent Viaduct is a Grade II listed structure. However, the site does not currently make a positive contribution to the area and the transformation of the site through the development would significantly enhance the setting of the canal and nearby heritage assets. There would be no adverse impacts on the setting of more distant heritage assets and overall the TVIA concludes that the development would enhance the historic environment.

81. There would be no adverse impacts on any protected views as a result of the development, and while the proposals would clearly result in a significant change to the character of the site from the existing, the site does not currently make a positive visual/amenity contribution to the area and it is considered that the proposals result in a significant improvement to the local area.

82. The proposed development would also result in a much improved relationship with the canal and the River Brent as a result of the open spaces that would be delivered and the increased access to these areas and natural surveillance that would be provided. Phases 1, 2 and 4a have been granted detailed consent with a high quality design being approved to all buildings. The revised Masterplan continues to be in accordance with the design principles initially established within the Framework Design Code for the site as a whole, and the architectural interest and detailing of the built form together with the landscaping proposed are welcomed and would complement the local area.

83. As noted above, the development would be of a different scale to the surrounding area. However, consideration has been given to the relationship between the development and its surroundings such that it would be sympathetic to the adjacent development. The tallest parts of the development would continue to be positioned in a logical and thought out manner, where they would serve to enhance legibility and mark the gateway of the Alperton Growth Area and Stonebridge Park Station as well as important public spaces on the site, and they would not harm any locally protected views.

84. Given the current site condition and the effects of development as outlined above, as well as the mitigation measures comprising tree planting and hoarding of the site during construction that are identified through the Townscape and Visual Impact Assessment, it is considered that the proposals set out within the revised Masterplan would continue to have a positive impact on the area and the proposal is supported in accordance with relevant Brent and London Plan policy.



## Phase 3 Development

### Form and Layout

85. Buildings G, H and J run in a broadly north-western to south-eastern direction and are positioned across the western area of the site. The buildings would occupy a linear strip of the masterplan site, connecting Beresford Avenue in the north and the Grand Union Canal, Central Gardens and Riverside Meadows to the south. Phase 3 will deliver a significant portion of communal landscaping, providing a shared amenity for the residents of Phases 1 to 3 and future phases. The linear 'Green Finger' landscape feature runs parallel to Building G & H, connecting to the Terraced Gardens which incorporates a significant water wall and public space adjacent to the dominant Block J.

86. Residential units are predominantly east–west oriented, with Buildings G and H having a rectangular shape and Building J hexagonal in shape. Building G is located on the northern edge of the masterplan, set back from Beresford Avenue, and forms the threshold at the main vehicular entry to the development from Beresford Avenue. The western boundary is defined by the main street which provides the primary vehicular access into the development. The eastern facades of the buildings face onto the landscape green spine which provides the primary pedestrian approach from Beresford Avenue towards the Communal Gardens in the south. Meanwhile, Building H is positioned on the intersection of the north-south and east-west routes and benefits from views over the communal gardens. The footprints of these buildings would be comparable to the existing industrial buildings to this part of the site.

87. Building J is located on a prominent position within the masterplan and forms the termination of the long vista from the eastern approach from Beresford Avenue. The building has a highly efficient floor plan with 8 homes around a single core and minimal internal circulation. The arrangement of homes around the circulation core has rotational symmetry and locates the larger homes on the corners. This internal arrangement maximises the number of dual aspect homes offering views in a number of directions.

88. Building G & H entrances are located at the highly visible corner formed where the building massing slides in plan form. The outer corner of the building is exposed providing views and daylight to the common circulation as well as increasing the numbers of apartments benefitting from dual aspect. The entrance points to these buildings are recessed to provide visual interest and differentiation to the main facades, helping them appear clearly defined. Residential accommodation is also provided at ground floor level, ensuring dead frontage is minimised to these buildings, and also providing an appropriate degree of natural surveillance.

89. The northern extent of the ground floor of Building G accommodates a small commercial unit suitable for cafe or retail use, which is considered logical given it is the most publicly prominent with visibility from the main vehicular access into the site from Beresford Avenue and the main pedestrian route through to the Central Gardens. The unit has frontage on two sides, maximising activity, and benefits from high levels of daylight and public accessibility.

### Height and massing

90. With regard to height and massing, Building G to the north has been designed as low-rise in order to ensure the built form does not appear overbearing or cause detrimental amenity impacts to existing residential properties on Beresford Avenue, before sloping up to its tallest form at Building J nearest to the communal gardens. Buildings G & H have a low-rise mansion building typology present within the Central Gardens character area.

91. The massing of these blocks is broken up using a staggered plan form, which has the further benefit of maximising the number of dual aspect flats. The change in vertical plane in elevation adds depth and shadow along the street, accentuating the visual interest of these buildings to passers-by. The proposed variation in heights between the buildings, stepping upwards in height

away from the low-rise context of the existing homes on Beresford Avenue, adds further visual interest along the street and provides better daylight penetration to other phases within the Revised Masterplan. The set-back floor enables the provision of further external amenity space for residents at roof level for use by the residents and further increases the number of dual aspect units.

92. Building J is orientated north south to follow the massing principles established by Buildings G and H. However, this block has been rotated slightly to maximise levels of daylight and sunlight reaching the central landscaped podium which sits between this block and Buildings F1 & F2. At 25 storeys the building would have a clear vertical emphasis, however it would have a clear base, middle and top which helps ensure this would not be overly dominant or vast particularly when seen in longer views. Its form subtly shifts from rectangular to a hexagonal plan using a fold in the elevation, which as well as adding visual interest, prevents a vast horizontal massing when seen from key views within the main public realm. The folded form softens the external north-east corner and results in a pinched elevation on the northern and southern elevations. The carved elevations would form an elegant feature on the skyline and is considered to be of a high quality.

93. Linear balconies are located on the northern and southern facades giving a strong horizontal emphasis, while recessed balconies are located on the eastern and western corners to add variation and maximise dual aspect units. As well as adding visual interest, the hexagonal form would also ensure 75% of homes can benefit from dual aspect to the six exposed corners of the building. A variety of views across the masterplan is provided to each apartment.

94. Officers acknowledge that a 25-storey tower has the potential to appear dominant and would be significantly taller than established building heights to the north. However as set out above the tower has been designed to be furthest away from the more suburban character to the north, and in connection with the lower-rise buildings at Blocks G and H, represent an appropriate shift between the established character and the Masterplan context, where there is justification for taller buildings nearer to the Grand Union Canal.

#### Architecture and materiality

95. The architecture and materials proposed to the three blocks are in line with the Framework Design Code agreed under the original Masterplan, and take an appropriate cue from both the previous industrial character of the site and the surrounding residential character, and architectural detailing would include features such as balconies, soldier-courses and bays that would help to break up the massing of the buildings and add visual interest.

96. The façade of Buildings G and H would have a varied grid expression and be largely of brick with a palette colour of light and dark grey, providing subtle variations and adding texture to these facades. Two variants of brick are proposed to distinguish between the outer frame of these buildings and the infill bay features, a smoother faced brick (applied to the framing elements) and a more textured faced brick (applied to the infill corbelled panels). This would be complemented with naturally toned coloured metal and coloured glazed brick at the entrance areas, adding further detail at ground floor level. Further variation would be used to distinguish between the two lower-rise blocks, with a lighter bronze and amber used to Building H, and darker, richer colours used to the double-height entrance area and window frames and balcony detailing of Building G.

97. The 25-storey Building J benefits from subtle changes in fenestration design across its three different parts, providing a transition from a heavier more masonry base to a lighter top section featuring more metal. The base section relates to the immediate context, featuring Juliet balconies to windows so that these rooms can open up to the park and surrounding landscape. The middle and top sections feature perforated metal side panels, with opening full-height glazed panels behind these they provide the natural ventilation for the rooms. The top section has a wider side panel than the middle section and therefore has a narrow brick pier.

98. Building J is designed to be a prominent landmark with a more distinctive material palette.

However, the selected materials still relate to the emerging context and reflect the proposed approach to buildings G and H, using brick infill panels, continuous white horizontal banding and metal details in the form of perforated side panels, balustrades and window frames. The brick forms the base material, with different tones ranging from the same light grey and white brick seen at Buildings G and H, but also introducing a light salmon tone which brings some uniqueness to this landmark building. The brick tone is contrasted by the white banding to ensure that the horizontal emphasis is legible. Added texture would be brought through the natural 'bronze' colour tones of the metal side panels and balustrades.

99. Overall, the proposed architecture and choice of materials within buildings G, H and J would be of a very high quality and has the potential to make a highly positive contribution to local townscape and the wider Alperton area. As with the original Masterplan, all materials in phase 3 are subject to a condition requiring samples to be provided before works commence, which would be attached to the planning permission.

### **Secured by Design**

100. The applicant has engaged during pre-application with the Secured by Design Officer, which is welcomed. As the majority of the application is made in outline, details of the proposed buildings within this outline area are not available. However, the submitted Design and Access Statement explains how the masterplan for the site designs out opportunities for crime, antisocial behaviour, and criminal and terrorist risks, and highlights how future specific measures have been incorporated within the detailed proposals with Phase 3.

101. The principles of Secured by Design have been applied to the proposed development and measures incorporated include ensuring that the proposed routes, including pedestrian and cycle routes, through the site form a network to avoid the creation of dead-ends; that parking areas are safe and secure; and that boundaries between public and private areas are clearly defined. The development provides for a range of uses across the site that ensure activity throughout the day as well as providing for surveillance of both the routes through the site and the areas of public realm and open space. In particular it notes that Building J is strongly linked to the Communal Gardens and provides natural surveillance. In addition blocks G and H provide continuous active frontages which encourage further natural surveillance. Private amenity spaces at ground floor are clearly demarcated and only accessible via the dwellings themselves.

102. The Design and Access Statement also advises that residential glazing and doors would be Secured by Design standard, and notes that the inclusion of ground floor commercial units mean that there would be a buffer to upper levels of residential accommodation within buildings. Where ground floor uses would be residential, there would be defined curtilages to the front of properties to create a sense of ownership, and where there are ground floor windows planting has been designed to achieve separation for residents and deter breaking and entering.

103. Entrances to buildings, residential cores and entrances into the main public areas of the site would be well lit, and public areas would also be covered by CCTV. The design of public areas as shown for the detailed part of the site has considered the positioning of seating to concentrate this in those areas with high footfall and surveillance and away from residential properties in order to reduce potential for any disturbance.

104. These measures would all serve to reduce crime and the fear of crime, anti-social behaviour and criminal and terrorist risks, and the applicant intends that further discussions with the Secured by Design Officer would be held to inform the detailed design of future phases of the development. The development would therefore provide for a safe, secure and accessible environment that would comply with national and Mayoral policy seeking to ensure quality of life and community cohesion, and is therefore supported.

### **Open Space and Public Realm**

105. One of the key benefits of the revised application is that it would increase the overall open space provision by approximately 15% above the original consent, which includes approximately 8,100 sqm of landscaping and open space being provided within Phase 3.

### Phase 3

106. Areas of public open space will be provided at ground level immediately to the north of Plot G providing a frontage to Beresford Avenue. A tree lined area of public realm will also be provided to the east of Blocks G and H, which will lead to a terraced central garden between Blocks J, L and M, with further public open space fronting the River Brent.

107. The landscaped central garden will include a water feature with a waterfall between Plots H and J. This has been designed to create a direct visual link with the River Brent, opening into a new area of designated public realm adjacent to the canal, which would be secured as part of the revised Masterplan.

108. Details of hard and soft landscaping have been submitted with the application and would be secured by condition. However the landscaping strategy would include trees ranging in height and canopies, along with shrubs, along both streets and building frontages, as well as within the central garden and roof terraces. New trees are also proposed along Beresford Avenue and the River Brent, which would have significant visual and environmental benefits. Mature trees will be provided in the central garden and near to the river, whilst semi mature trees will be planted on Beresford Avenue and along the internal streets.

### Revised Masterplan

109. The landscaping strategy for later phases is largely in line with what was approved under the original Masterplan. However a summary of the key character areas and features is set out below:

- **Riverside Meadow:** Phases 5-7 (inclusive) would include restoration of the natural landscape including replacement tree planting. Zone to provide informal and equipped play space and an attenuation pond;
- **Central Gardens:** in Phase 5 and Phase 6 (with a small section delivered within Phase 3) to include open space, flexible civic space, semi mature trees, amenity grass and ornamental shrubs, along with informal and equipped play space;
- **Public Realm:** comprising street trees and shrubs;
- **Semi-private doorstep play:** distributed across communal gardens providing informal and equipped play space; and
- **On Plot private / semi-private amenity space:** comprising balconies, front/rear gardens, communal gardens and roof terraces.

110. This would be in addition to the Canalside area (up to 0.76 hectares) which was secured in the previous permissions regarding phases 1 and 2a for a total of more than 4.6ha of public realm across the scheme.

111. The scale and layout of these spaces is considered to provide good quality spaces that can accommodate a range of uses. The sites are publicly accessible and incorporate green areas with suitable planting that provides enhanced amenity for the development and existing community. The layout and design of development would provide for surveillance of routes and open spaces with some active uses at ground floor level which would animate the spaces and encourage their use. The spaces have been designed to enhance and encourage biodiversity.

112. Children's play space to cater for younger aged groups is proposed across the site, meeting needs arising from the development and supporting the existing community as considered in more detail within the 'play and recreation' section of this report below.

113. Spaces would be managed by the applicant for the long term, ensuring their continued contribution to the site and area. The provision of open space on the site would result in a substantial increase in both the quantity and quality of open space within the area and would be supported in accordance with Brent and GLA policy.

### Amenity Space

114. With regard to external amenity space, emerging London Plan policy D6 specifies that where there is no higher local standard, a minimum of 5 sqm of private amenity space should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant.

115. The DMP19 requirement for external private amenity space established through DMP19 is for it to be of a "sufficient size and type". This may be achieved even when the "normal expectation" of 20 or 50 sqm of private space is not achieved. The supporting text to the policy clarifies that where "sufficient private amenity space cannot be achieved to meet the full requirement of the policy, the remainder should be applied in the form of communal amenity space". Proximity and accessibility to nearby public open space may also be considered when evaluated whether the amenity space within a development is "sufficient", even where a shortfall exists in private and/or communal space. The supporting text to the policy refers to the provision of "communal space" within a scheme in order to off-set a shortfall in private space and it does not specifically refer to the provision of new public open space. New public open spaces serve a comparable function to communal open spaces but are also also accessible to other residents (e.g. of the surrounding areas). As such, it is considered that the provision of new public open space also represents the provision of external amenity space which contributes towards the standard of accommodation for future residents.

116. The new homes are proposed to have a hierarchy of open spaces available to them, including private balconies / terraces for all but 50 homes (see discussion below), communal open spaces and new public open space. Where private balconies/ terraces are provided, they would all accord with Policy D6 of the ITP London Plan in this regard.

117. The table below sets out both private and communal amenity requirements and provision, both for Phase 3 and the revised Masterplan. It should be noted that the private amenity space is required on a home by home basis. However, the cumulative totals for the targets has been reported to allow the consideration of the amenity provision having assessed proposed communal and public spaces within the scheme.

<b>LBB total private amenity target</b>	<b>GLA total private amenity requirement</b>	<b>Private amenity provision shortfall</b>	<b>Communal amenity provision</b>	<b>Shortfall against LBB standards (with private communal amenity accounted for)</b>	<b>Open Space provision (revised masterplan area only)</b>
<b>Phase 3</b>					
11,450 sqm	2,669 sqm	7,638 sqm	1,346 sqm	6,292 sqm	8,027 sqm
<b>Phases 4-7 (outline)</b>					
54,800 sqm	12,206 sqm	<i>Subject to Reserved Matters Applications. Indicative amount: 43,096 sqm*</i>	10,451 sqm	<i>Subject to Reserved Matters Applications. Indicative amount: 32,645 sqm</i>	15,055 sqm

<b>TOTAL:</b>		<i>Indicative amount: 50,734 sqm</i>	<i>Indicative amount: 38,937 sqm</i>	<b>23,082 sqm</b>
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\*Indicative levels of private amenity space have been estimated using the Mayor's targets within Policy D6. However, the precise amount of private outdoor space would be established through the approval of Reserved Matters.

118. Within Phase 3, 5,158 sqm of private and communal amenity space has been proposed, which means there would be a shortfall of approximately 55% below Brent's the amenity space targets set out under Policy DMP19 excluding new public open spaces. Furthermore, while exact amenity space requirements are not known for each phase within the revised Masterplan, these have been estimated using the Mayor's standard and it is anticipated that there would be a shortfall of approximately 60 % excluding new public open spaces.

119. Whilst this shortfall of private and communal amenity space is acknowledged, officers place significant weight on the amount of high quality, usable area of public realm with an additional 2.3ha of public open space proposed within the revised masterplan boundary. This would constitute new public open space to be provided within the development, in close proximity to the proposed homes within the development, and therefore is expected to benefit future occupiers of the development most whilst also being accessible to other nearby residents, improving social cohesion. If taking this space into account, the overall estimated shortfall would reduce to 15,855 sqm, with total external amenity space provision at 50,395 sqm, representing 76 % of the Brent target.

120. Furthermore, the site is within close proximity of other areas of public open space, notably Heather Park (<50m) and the nearby Mount Pleasant. As noted above, this would be in addition to the Canalside area (up to 0.76 hectares) which was secured in the previous permissions regarding phases 1 and 2a for a total of 4.6ha of public realm across both sites.

121. As highlighted above, within the detailed phase 3 development, 50 homes would not have private amenity spaces (1 home in block G, 1 home in Block H and 48 homes in Block J). 48 of these 50 are studio flats, which have been designed to exceed the minimum space standards by a commensurate amount and would have large opening windows with Juliette balconies, effectively internalising this space so that the area becomes useable in all weathers. This approach is broadly supported by the Mayor's Housing SPG. These units would receive good levels of daylight and outlook in addition to easy access to the public open spaces proposed. Taking into consideration the high quality of the units in conjunction to easy access to high quality open space, this approach when applied to a small percentage of the overall housing provision on this phase is considered to be acceptable on balance and in this instance.

122. In addition, the applicant committed to a contribution of £50,000 under the original Masterplan for improvements to existing public open space and play-space within the vicinity of the application site. This was paid in February 2019. As a result of this, the shortfall of amenity space is considered acceptable due to the close proximity of the public open space provided as part of this application, the nearby existing parks, and the contributions towards improvements to nearby open spaces. Furthermore, the revised masterplan proposes a 15% increase in open space across the entire Grand Union masterplan in comparison to only a 10% increase in the number of units proposed under the revised masterplan (320 additional units).

123. On this basis, the shortfall in provision against Brent Policy DMP19 targets and emerging London Plan Policy D6 is acknowledged. However, despite this shortfall, given the amount and quality of space that is proposed, the amount and quality of space that is proposed in the earlier phases of the Grand Union development and the proximity to other existing open spaces, the shortfall is not to a degree that would significantly affect the quality of the space and the proposed areas of external amenity space are considered to be sufficient in size and type to satisfy the needs of future residents. The limited conflict with policy is considered to be outweighed by the

benefits of the proposed development.

Play and Recreation

124. In addition to the significant amount of publicly accessible open space and external amenity provided for future residents outlined above, the revised Masterplan includes designated play space throughout the site for children of all ages, comprising:

- Under 5: Doorstop play within each private courtyard, informal and equipped spaces distributed throughout the public realm.
- 5 to 11: A range of equipment to support a variety of activities, including further informal spaces within the open spaces.
- 12 plus: Social spaces to meet, hang out and take part in informal sport or physical activity, including appropriate facilities.

125. The play provision strategy includes extensive playable landscapes, accessible to both disabled and non-disabled, with a variety of open space, playable features, landscape elements and formal equipment. Sculptures and water play will be located along the canal and within the public space to the south of the community centre as part of the extant permissions for (Phases 1 and 2), the proposed play provision is considered to be suitable to the surrounding landscape. Located within the Central Gardens there would be more active and natural play features. Within the Riverside Meadows informal play spaces and interactive sculptures would be provided in accordance with The Mayor’s Housing SPG.

126. Each private courtyard includes doorstep play spaces for children under 5, and additional informal equipped play spaces are included within the public realm including adjacent to the community centre, within the Central Gardens and Riverside Meadows. The arrangement of play facilities means that all homes would be within 100m of facilities. A condition has been recommended to secure the detail of that play space, and an update to the site-wide provision of play space, through the submission of Reserved Matters applications on a phase by phase basis.

127. Five play spaces for children aged 5 to 11 have been provided adjacent to the community centre, within the Central Gardens and Riverside Meadows and include a trim trail. For children over 12, social spaces have been provided including ‘kick about’ space, a trim trail and an outdoor stage within three areas; adjacent to the community centre, within the Central Gardens and the trim trail along the Riverside Walk.

128. The application documents specify that the child yield of the proposed development would be 1,107 children, giving rise to a requirement for 11,070sqm of play space (as calculated using the Mayor’s SPG calculator tool). The submitted Design and Access Statement confirms that playspace provision would exceed the required standard, providing the following:

	<b>Phase 3 requirement (sqm)</b>	<b>Phase 3 area provision (sqm)</b>	<b>Outline area requirement (sqm)</b>	<b>Outline area provision (sqm)</b>
<b>Under 5</b>	900	1778	4,240	TBC
<b>5 to 11</b>	660	660	3,090	TBC
<b>12 plus</b>	410	400	1,770	TBC
<b>Total</b>	1970	2838	9,100	TBC
<b>Difference</b>	+868			
	<b>Site Wide Total Required</b>		<b>Site Wide total Proposed</b>	
	11,070		11,748	
<b>Difference</b>	+678			

129. The submission demonstrates that the provision of play space exceeds Brent and Mayoral

policy and guidance, and the strategy would provide for a range of spaces that would be appropriate to the site and landscape and that would meet the needs of children within the existing and new community and is supported. Further details of the play space provision would be required by condition for the detailed part of the application and as part of future Reserved Matters applications.

### **Quality of residential accommodation**

#### **Revised Masterplan**

130. As most of the proposal is in outline there are no detailed proposals for the residential plots within this outline area. However, the Design and Access Statement advises that the proposal will be designed to deliver a high quality residential environment across the site and the quality of new homes can be assessed through the consideration of the Reserved Matters applications.

#### **Phase 3 development**

131. Full permission is sought for Phase 3 and as such detailed information has been provided for blocks G H and J which are assessed below.

#### **Layout**

132. Policy D6 of the ITP London Plan requires that developments limit the maximum number of units per lift core to no more than 8. Block J would comply with this. It is noted that this would be exceeded on most floors of Block G and on the lower floors within Block H with some cores being shared by as many as 12 units. However, it is noted that these blocks have been designed with staggered floor plans to assist with this, and as outlined in other sections of the report, maximises dual aspect units. Furthermore, the upper most floors in block H would have 8 units per core. These cores would contain 2 lift shafts and the overall layout of the floorplates is simplified with the lift cores centrally located and easily accessible, in addition the cores would benefit from natural daylight which further weights in favour of the proposed layout. As such, the over-provision of units per core on some floors is considered not to detrimentally impact the overall quality of the developments as a whole and would be acceptable on balance.

#### **Space standards**

133. Policy DMP 18 and the guidance in SPD1 require new dwellings to meet the minimum space minimum space standards set by policy 3.5 of the Publication London Plan.

134. All of the proposed units would meet or exceed these standards and all bedrooms would meet the minimum sizes as set out by the technical housing standards and policy D6 of the Publication London Plan. The floor to ceiling height of each unit would meet the 2.5m minimum required for development within London. All habitable rooms would be served with an external window with sufficient space adjacent to provide acceptable levels of outlook throughout the scheme.

135. The Mayors Housing SPG states that single aspect dwellings should be avoided. Of the proposed units 61% would be dual aspect, which represents an increase from 53-54% approved under the original Masterplan, and is considered a significant benefit of the revised scheme. The number of single aspect units have been minimised where possible, with a predominantly east-west orientation to the Phase 3 buildings ensuring there would be no single aspect north facing units within this phase. Of those units which are single aspect, all would be of a good internal standard and this is considered acceptable. Exact floor layouts have not been provided for later phases, however officers expect that dual aspect units would be maximised and this intention is reflected within the Framework Design Code.

#### **Overheating and Ventilation**



136. The proposed units are proposed to use openable windows as the primary means of ventilation along with background mechanical ventilation to assist.

137. The applicant has provided a Dynamic Overheating Assessment which analyses the potential for units to overheat and test proposed mitigation measures. The assessment concludes that all units tested would demonstrate an acceptable level of overheating. The conclusions and methodology of this report is accepted.

### Privacy

138. DMP1 requires that new development maintain adequate privacy for future occupants. SPD1 provides guidance in the regard by requiring a separation distance of 18m between any directly facing habitable windows.

139. The proposal would have a distance of approximately 21m between the approved buildings in Phase 2a and the proposed blocks at their nearest point. The distance between blocks G and H would be approximately 18m at the closest point complying with the above policy. Block J would be located 33m from the windows on block H. The distance between Block J and the approved block in Phase 2 would be just 11m at the closest point. However, officers acknowledge that this has been envisioned as part of a wider, high density urban development with different site circumstances, with no harm caused to adjoining established properties along Beresford Avenue by the proposals. As such some flexibility can be applied to the guidance. The proposed units would be high quality and receive sufficient daylight and outlook. On balance the shortfall in separation distance is considered acceptable in this particular location.

140. Overall the level of privacy afforded to future occupiers is considered to be acceptable.

### Noise

141. The Environmental Statement includes an assessment of potential noise and vibration impacts to and as a result of the proposed development utilising survey data and modelling. The assessment takes into account noise sources, including the surrounding road network, adjacent industrial uses, the Ace Café, proposed industrial space within the development, traffic generated by the development, and activity within the proposed community centre and commercial space. A residential site suitability assessment has also been included as part of the ES, within Chapter 9 of the document (Noise and Vibration).

142. This assessment confirms that the dominant sound source affecting the proposed development would be from road traffic, which is in line with the conclusions drawn by the previous assessment associated with the original Masterplan, which involved four long term surveys being conducted as part of a comprehensive assessment.

143. However, impacts from road traffic on the majority of the site would not be significant, although some properties fronting busy roads may require mitigation. The original Masterplan identified that properties facing the existing Ace Café may also require enhanced glazing and ventilation to mitigate potential noise effects, although industrial uses to the west would not result in any significant impacts. A condition was attached to the original permission requiring further details of acoustic design to be submitted as required, and later phases would require details as part of the relevant Reserved Matters application.

144. The reports also indicate that there is potential for noise and vibration impacts as a consequence of enabling works, demolition and construction activity. However, control measures within a Construction Environmental Management Plan (CEMP) would ensure impacts are minimised and that they would be acceptable. Traffic flows from the development would not result in any significant impacts on surrounding receptors. The assessment indicates that noise from plant and equipment should be controlled through detailed design to achieve target noise levels,

and this would again be secured by condition.

145. With regard to the external acoustic environment experienced in outdoor amenity areas, the report identifies that this likely to be below the 55 dB upper guideline value across the majority of the Site, however there may be higher levels experienced to areas within a line of sight to the North Circular Road. In order to mitigate noise ingress to these external amenity areas, it is considered that the use of boundary barriers and variations in ground height may be an appropriate design solution at the detailed reserved matters stage of phases 4b – 7, and this should be thought through as part of the detailed landscaping scheme for the relevant phases.

146. Subject to the details of mitigation measures as outlined above being secured by condition and future reserved matters applications, and the effective implementation of such measures, the development would provide for an acceptable acoustic environment for future occupiers. Furthermore, the proposed use would not result in restrictions on existing operations in the area with regard to the 'Agent of Change' principle set out within Policy D12 of the Publication London Plan.

147. The submission therefore demonstrates that a satisfactory environment can be provided for future residents, subject to conditions, and that there would not be unacceptable impacts on the existing area including residents and businesses. The development therefore complies with relevant Brent and London Plan policy.

#### Internal daylight and sunlight levels

148. The applicant has submitted an internal Daylight and Sunlight assessment to support the application, which assesses levels of daylight reaching habitable rooms using an Average Daylight Factor (ADF) analysis has been undertaken, which is acceptable as a means of assessment.

149. The report concludes that 945 of the 1,203 habitable rooms assessed, or 79% would achieve the minimum ADF levels for a bedroom (1%) or living room (1.5%). It notes that several of the rooms tested are shared Living/Kitchen/Dining (LKD) rooms and normally kitchens require ADF levels of 2%. It is also acknowledged that of the rooms that fail to meet minimum ADF criteria, most are overhung by balconies and the provision of amenity space for the trade-off between amenity space and daylight impacts must be considered. An assessment taken without balconies would increase the compliance rate to 88%.

150. Many of the units have access to private balconies and overall the majority of rooms achieve an acceptable ADF on balance, this is considered acceptable when weighing up the benefits of private amenity space.

151. An Annual Probable Sunlight Hours (APSH) test has also been carried out on 691 south facing windows. BRE guidelines suggest that windows should achieve at least 25% with at least 5% during winter months. The report notes that 42% of south facing windows tested would achieve the required 25% with 5% during winter. Of the remaining windows 149 rooms would achieve between 15%-24% APSH.

152. Officers acknowledge that not all windows would comply with the above guidance. However, it is considered that flexibility should be applied in more dense urban environments, and this is reflected in BRE guidance. It is also noted that all units feature projecting balconies which would contribute to a reduction in sunlight received to the windows they overhang. When assessing without balconies, a further 38 rooms would meet the 25% criteria and a further 123 rooms would meet between 15—24% APSH.

153. On balance, given that the number of single aspect homes has been reduced as far as practicable and that the proposals have sought to avoid single aspect north facing homes; the quality of the accommodation that would be delivered as part of the high density development; together with the benefits that the development would deliver through transformation and

regeneration of the site and making effective use of the land to deliver new homes, employment and community facilities as well as open space; the development is considered to deliver an acceptable standard of amenity for future residents in accordance with relevant policy and guidance. Overall, the quality of accommodation proposed across the revised Masterplan would not be materially worse than the extant permission.

### **Impact on neighbouring residential amenity**

#### **Daylight, sunlight and overshadowing**

154. The Environmental Statement assesses daylight, sunlight and overshadowing, including the effects of the development on the surrounding area and the amenity of surrounding residential properties. A full daylight and sunlight report has been submitted and undertaken in accordance with BRE guidelines.

155. The assessment indicates that there are 516 windows to 217 residential rooms around the site that are relevant for assessment. These were considered in terms of both vertical sky component (VSC) and no sky line (NSL) measures to consider daylight, and annual probable sunlight hours (APSH) to consider sunlight.

156. This assessment highlights that the design of the development ensures that the impact on the surrounding area has minimised the potential impact on daylight/sunlight where possible. Officers acknowledge that there would be some change from the existing situation, with some habitable rooms further affected as a result of the increase in proposed building heights within the revised Masterplan, when compared with the extant scheme. However it must be acknowledged that the revised Masterplan site is currently predominantly cleared, and the arrangement of development on the site (particularly with regard to reducing levels of massing of development to the north and south boundaries of the site) would minimise effects on surrounding properties while ensuring effective use of the land. Generally good levels of daylight and sunlight would be retained to surrounding neighbouring properties, and the proposed development would broadly comply with BRE guidelines for the detailed part of the application.

157. The daylight, sunlight, and overshadowing assessments within the latest ES have been undertaken based on two scenarios:

1. The maximum height and massing for the proposed revised masterplan, as shown on the Maximum Building Heights Parameter Plan. This represents the worst-case for the proposed development once constructed and operational.
2. The Illustrative Masterplan to enable a comparison to be drawn between against the maximum parameter massing. The illustrative masterplan has been designed within the limits of the maximum parameters and in accordance with the Framework Design Code, and therefore represents a reasonable future development proposal within the outline element of the scheme (Phases 4-7) following detailed design at reserved matters stage, having regard for the impact upon neighbouring sensitive receptors and designing to minimise daylight, sunlight and overshadowing effects wherever possible.

158. When considering this second scenario, in regard to VSC, the assessment demonstrates that there would 193 of the 332 windows serving habitable rooms would meet the relevant criteria, representing 58% of relevant windows. This represents a decrease from 62% (204 of 332 windows) achieving VSC criteria under the original Masterplan. Whilst there is an overall reduction in the compliance rates (4%), the changes in absolute VSC between the consented and proposed schemes are considered to be minor.

159. The changes in absolute VSC have been broken down in the below table:

Changes in Absolute VSC	Gains	0-1% VSC	1-2% VSC	2-3% VSC	3-4% VSC	4-5% VSC	5-6% VSC
No. of Windows	33	38	21	26	15	5	1

160. This table demonstrates that of the 139 windows that do fall short of guidance, the vast majority (85%) will either experience a slight gain in comparison to the original Masterplan, or will experience a less than 3% change in absolute VSC. Given the high density, regenerative context of the scheme being delivered, officers consider these shortfalls to be acceptable.

161. With regard to NSL criteria, the assessment demonstrates that 75% of the 217 habitable rooms within the identified residential properties will fully comply with the BRE NSL criteria and therefore experience a negligible effect. 7 rooms (3%) would experience a minor adverse effect, 12 rooms (6%) would experience a moderate adverse effect, with 35 rooms (16%) experiencing a major adverse effect.

162. However, when considering the above alongside an alternative retained NSL target of 60%, of the 54 rooms that would experience an adverse effect, 19 rooms (9%) would experience a minor adverse effect, 32 rooms (15%) would experience a moderate adverse effect and 3 rooms (1%) would experience a major adverse effect.

163. Furthermore, when considering the illustrative masterplan, compliance with NSL targets would actually be improved from the consented scheme (increasing from 95% to 98%).

164. The assessment concludes that there would be a total of 32 properties which would be more significantly affected in terms of daylight losses resulting from the proposed development. The applicants ES sets out further details of these properties:

165. **99 Beresford Avenue** - This property is a residential dwelling located to the north of the site, having a total of 12 windows facing the development which serve 5 habitable rooms. 6 of these 12 windows would experience VSC reductions, however, 5 of the windows (84%) will retain in excess of 20% VSC (minor adverse). The remaining window retains 19.15% VSC, however it serves a room lit by three other windows that all experience a negligible VSC effect, such that the overall effect on VSC to this room is considered to be minor adverse. For NSL, all 5 rooms (100%) would meet the BRE criteria for daylight distribution and therefore experience a negligible effect.

166. **Nos. 65/65a – 83/83a Beresford Avenue (inclusive)** - These 10 properties are two-storey, semi-detached residential maisonettes located to the north of the site. There is a total of 20 main windows facing the site serving 20 habitable rooms. In terms of VSC, no windows (0%) would meet the BRE numerical targets. All 20 windows will experience relative reductions in VSC of between 46.8% and 55%, considered to be major adverse. However, this is largely due to the high existing baseline levels of VSC owing to the relatively cleared baseline conditions. When considering the retained levels of VSC, however, 2 of the windows (10%) will retain in excess of 20% VSC (minor adverse). The remaining 18 windows (90%) retain in excess of 15% VSC, ranging from 15.78% to 19.07% (moderate adverse).

167. However, the assessment also indicates that a future scheme that is designed in accordance with the Framework Design Code and within the maximum parameters can be achieved with any daylight effects to these properties being limited to permanent, direct and of no more than minor adverse significance, with all windows retained levels of VSC in excess of 20% and all rooms meeting the NSL criteria. It is considered that the assessment is based on a 'worst-case' scenario and unlikely to be realised once full details of building heights and massing are considered at reserved matters stage, with development designed to minimise the effect upon daylight to these properties.

**168. Nos. 57/57a – 63/63a Beresford Avenue (inclusive)** - This series of 4 properties are two-storey, semi-detached residential maisonettes located to the north of the site. There is a total of 13 main windows facing the site serving 11 habitable rooms. In terms of VSC, 8 windows (62%) would experience relative reductions in VSC of between 46.96% and 50.73% (major adverse). However, this is largely due to the high existing baseline levels of VSC owing to the relatively cleared baseline conditions. When considering the retained levels of VSC, however, all of the 8 windows will retain in excess of 15% VSC (moderate adverse) ranging from 17.45% to 19.45%. For NSL, 9 rooms (82%) will meet the BRE criteria for daylight distribution and therefore experience a negligible effect. The 2 remaining rooms (18%) will experience relative reductions in NSL of 38.4% and 40% (moderate adverse), although retained levels of NSL are 59.9% of the working plane (moderate adverse) and 61.5% (minor adverse).

169. Again, the assessment also indicates that a future scheme that is designed in accordance with the Framework Design Code and within the maximum parameters can be achieved with any daylight effects to these properties being limited to permanent, direct and of no more than minor adverse significance, with 10 of the 13 windows exceeding 20% VSC and the remaining either meeting BRE guidance or retaining 19.6% VSC. Similarly, a more likely built form in line with the Design Code would result in 9 of the rooms meeting the NSL criteria, with the remaining 2 having a retained NSL in excess of 60% of the working plane, which is considered a minor adverse impact. It is considered that the assessment is based on a 'worst-case' scenario and unlikely to be realised once full details of building heights and massing are considered at reserved matters stage, with development designed to minimise the effect upon daylight to these properties.

**170. Nos. 29/29a – 55/55a Beresford Avenue (inclusive)** - This series of 14 properties are semi-detached residential maisonettes located to the north of the site. There is a total of 36 windows serving 36 habitable rooms facing the site. In terms of VSC, 30 windows would experience reductions outside of BRE targets, with 1 experiencing a relative reduction in VSC of 25.29% (minor adverse) and 29 windows (81%) will experience relative reductions in VSC of between 46.89% and 61.65% (major adverse). However, this is largely due to the high existing baseline levels of VSC owing to the relatively cleared baseline conditions. When considering the retained levels of VSC, however, 1 window will retain 20.61% VSC (minor adverse), 27 windows will retain between 15.89% and 19.39% VSC (moderate adverse) and the remaining window will retain 14.08% VSC (major adverse).

171. In terms of NSL criteria, 7 rooms (19%) will meet the BRE criteria for daylight distribution and therefore experience a negligible effect. Of the 29 remaining rooms, 2 will experience relative reductions in NSL of 33.4% and 36.2% (moderate adverse), although retained levels of NSL are in excess of 60% (minor adverse) ranging from 63.7% to 66.5%. The other 27 rooms will experience relative reductions of between 41.2% and 66.9% (major adverse), although for 24 of those rooms the retained levels of NSL are greater than 40% (moderate adverse) ranging from 40.6% to 59.9% of the working plane. The remaining 3 rooms would experience a more significant reduction, with NSL retained levels of between 33% and 39.8%.

172. Again however, the assessment indicates that a future scheme that is designed in accordance with the Framework Design Code and within the maximum parameters can be achieved with any daylight effects to these properties being limited to permanent, direct and of no more than minor adverse significance, with 28 of the windows (78%) retaining a VSC in excess of 20%, with the remaining retaining in excess of 15% VSC in these circumstances. Assessing NSL levels in this more likely scenario, 35 rooms (98%) would meet the BRE (i.e. a negligible effect), whilst the remaining room would fall just short of the BRE target, at 20.6% (minor adverse). It is therefore considered that the assessment is based on a 'worst-case' scenario and unlikely to be realised once full details of building heights and massing are considered at reserved matters stage, with development designed to minimise the effect upon daylight to these properties.

**173. Nos. 25/25a – 27/27a Beresford Avenue** - These two properties are a pair of semi-detached maisonettes located to the north east of the site on Beresford Avenue. There is a

total of 6 windows serving 6 habitable rooms facing the site. In terms of VSC, 5 of the 6 windows would experience reductions outside of BRE guidance, with 1 of these experiencing a relative reduction in VSC of 25.29% (minor adverse) and 4 windows (67%) will experience relative reductions in VSC of between 59.49% and 65.4% (major adverse). However, this is largely due to the high existing baseline levels of VSC owing to the relatively cleared baseline conditions. When considering the retained levels of VSC, however, 3 of the 4 windows will retain in excess of 15% VSC (moderate adverse) ranging from 15.06% to 17.61%, and the other window retains 11.75% (major adverse).

174. In terms of NSL criteria, 2 rooms (33%) will meet the BRE criteria for daylight distribution and therefore experience a negligible effect. Of the 4 remaining rooms, 2 will experience relative reductions in NSL of 23% and 23.6% (minor adverse). The other 2 rooms will experience relative reductions of 32.1% and 32.7% (moderate adverse), although retained levels of NSL are greater than 60% (minor adverse) ranging from 67.2% to 67.7% of the working plane.

175. Again however, the assessment indicates that a future scheme that is designed in accordance with the Framework Design Code and within the maximum parameters can be achieved with any daylight effects to these properties being limited to permanent, direct and of no more than minor adverse significance, with 2 of the 6 windows tested would meet BRE criteria for VSC, with the remaining 4 windows retaining in excess of 15% VSC in these circumstances. Furthermore, all rooms would meet the NSL criteria under this more likely scenario. It is considered that the assessment is based on a 'worst-case' scenario and unlikely to be realised once full details of building heights and massing are considered at reserved matters stage, with development designed to minimise the effect upon daylight to these properties.

176. **Prospect House** - This property is a residential block located to the south of the site on the North Circular Road. There is a total of 36 windows facing the site serving 16 habitable rooms. In terms of VSC, 30 of the 36 windows would experience reductions in levels outside of BRE guidance, with all of these experiencing relative reductions in VSC of between 31.84% and 38.57% (moderate adverse). When considering the retained levels of VSC, however, 33 of the windows (92%) will retain in excess of 20% VSC (minor adverse). The remaining 3 windows retain between 16.71% and 19.83% VSC (moderate adverse). For NSL, all 16 rooms (100%) will meet the BRE criteria for daylight distribution and therefore experience a negligible effect.

177. Therefore, the effect of the development upon the daylight amenity to this property is considered to be of minor adverse significance.

178. Overall, officers consider that there would be a very good level of compliance with BRE guidance in terms of daylight levels overall, and only a slight reduction when comparing the revised and original Masterplan positions. The assessment demonstrates that for VSC, there is only a slight reduction in overall compliance rates, however when reviewing the absolute changes in VSC of the windows that do not meet the BRE criteria, the majority of the windows will either experience gains, or only a small reduction. When comparing the NSL results, there is actually an improvement in the overall compliance rates as a result of the revised Masterplan.

179. With regard to sunlight, the assessment sets out how relevant neighbouring properties would be affected, using likely changes to the number of Annual Probable Sunlight Hours (APSH), which is in line with BRE guidance. An assessment of the baseline figures has been provided (i.e. without any development in place), as well as a comparison between the extant Masterplan position and the revised Masterplan.

180. The assessment demonstrates that the revised Masterplan would have a minor adverse impact on sunlight levels reaching affected properties, with 161 of 164 southerly orientated rooms (98%) achieving recommended APSH levels, as opposed to 163 of 164 rooms (99%) under the extant consent. Furthermore, the report states that the three additional rooms that fall short of guidance would only experience changes in absolute Annual Probable Sunlight Hours (APSH) (total and winter) of 2% which again is not material in the wider context of the significant

regeneration this site is facilitating. The remaining room that fell short previously is unchanged and would still meet the criteria for total sun but fall 1% short of the criteria for winter sun.

181. Overall, whilst there is a very slight reduction in overall compliance rates (only 1%), these are a result of only very small absolute changes in sunlight levels that are unlikely to be noticeable to the occupants. Given the significant increase in scale and density being proposed in this location, this is considered to remain a very good level of compliance with BRE guidance overall.

182. With regard to potential overshadowing impacts, the assessment has identified all private gardens and amenity spaces which are sensitive to overshadowing impacts using the sun on ground hours assessment. The BRE overshadowing assessment is passed where at least 50% of the garden area/ amenity space would retain exposure to at least 2 hours of direct sunlight on 21st March.

183. The assessment demonstrates that 56 of the 61 areas assessed (92%) would be fully compliant with the BRE criteria. There would be a minor impact to 3 other properties (33 and 35A/B Beresford Avenue), however the level of reduction would fall only slightly under recommended levels, and therefore is not considered a significant shortfall. A further 2 properties would experience more noticeable overshadowing impacts, relating to two flats at 25 Beresford Avenue. The rear garden would retain at least 2 hours of direct sun to 24% of its area (a 40% relative reduction (moderate adverse)) and the side garden would retain at least 2 hours of direct sun to 37.9% of its area [moderate adverse] (a 58% relative reduction). However, this is considered a 'worst-case scenario', and it is likely that at reserved matters stage, these overshadowing impacts could be effectively mitigated through good design and massing. Overall given the high density, urban context, the development is considered to achieve a high degree of compliance. It is also important to note that the development would not result in harm to the canal or River Brent by reason of overshadowing or impact on light levels.

184. Overall, the quality of light within and surrounding the development is considered to have been maximised where possible and would achieve standards commensurate with a high density urban development, and with regard to the need to make efficient use of the site the impacts on the surrounding area are on balance considered to be acceptable. The development would therefore ensure the amenity of these surrounding uses in accordance with Brent and London Plan policy.

#### Overlooking and privacy

185. In order to retain acceptable privacy levels to properties, SPD1 states that all primary habitable room windows within a property should be at least 9m from the boundary with the private external amenity space of neighbouring properties or adjoining sites, except where the view on to that property would be to a part of the property which would serve as low value amenity space (e.g. the side access around a house). All secondary habitable room windows and non-habitable room windows should be obscure glazed if they cannot achieve this standard too. Furthermore, proposed habitable room windows should achieve a full 18m of separation from the habitable room windows of other properties (apart from street facing windows). These standards are in the interests of protecting the privacy of neighbouring occupiers.

186. The amendments to the Masterplan would not result in any significant increase in overlooking or privacy issues to neighbouring properties to the north or south, with building footprints and layouts generally in accordance with the Framework Design Code as approved within the extant Masterplan. As outlined above, there would be only 11m maintained between the south façade of Block J and the north facing windows of Block F1, as approved under Phase 2. However, officers acknowledge that this has been envisioned as part of a wider, high density urban development with different site circumstances, and as such some flexibility can be applied to the guidance. The proposed units would be high quality and receive sufficient daylight and outlook. On balance the shortfall in separation distance is considered acceptable in this particular location.

## **Residential Density**

187. The site currently has a varying PTAL rating of between 0 (very poor) at the west of the site, increasing towards the east to a rating of 3 (moderate). The proposed development has a density of 454 units/hectare or 1,270 habitable rooms/hectare across the whole site, with a density of 356 units/hectare or 934 habitable rooms/hectare within Phase 3. These are slightly above the density levels agreed under the original Masterplan, and above the suggested densities in the current London Plan.

188. However the Plan also advises that it is not appropriate to apply this table mechanically, and account should be taken of factors relevant to optimising housing potential including local context, design and transport capacity as well as social infrastructure. The Publication London Plan further emphasises at Policy GG2 the need to create high-density, mixed use places that make the best use of land, and draft Policy D6 advises that development proposals must make the most efficient use of land and be developed at the optimum density.

189. As was noted when permission was granted for the extant Masterplan, the site is within the Alperton Housing Zone which is seeking to accelerate the delivery of housing, and where higher densities of development would therefore be expected and it is also at the edge, but still within, the Alperton Growth Area. In addition, the site has an acceptable level of access to the public transport network, and the proposed development would deliver improvements to connectivity for pedestrians and cyclists, and by increasing bus numbers, increasing access to public transport.

190. As with the original Masterplan, the applicants have agreed to provide a commuted sum to allow TfL to improve bus capacity/frequency along Beresford Avenue, and have agreed to provide a commuted sum to provide for additional gateline capacity at Stonebridge Park Station. The PTAL rating across the site would therefore be increased slightly, and as a consequence the site continues to be in a location where a higher density of development is considered appropriate.

191. It is therefore considered appropriate that the capacity for residential development on the site has been optimised in accordance with London Plan objectives, and the density proposed further allows for the inclusion of a range of uses to support a sustainable community as well as generous areas of public realm on the site that would not otherwise be achievable.

192. As such, the development would make efficient use of the site taking into account local context, character and design principles as well as accessibility and the sustainable location of the site to provide a high quality new community, and the resulting density is considered acceptable in accordance with national, London and Brent planning policy objectives.

## **Transport and highways**

### **Background**

193. This application does not affect the approved proposals for Phases 1 or 2 of the originally approved development, nor the generator site fronting Old North Circular Road, but does alter the later phases in order to deliver an additional 320 homes (i.e. an approximate 10% uplift on the approved scheme) and the remaining 688 sqm of commercial floorspace. A Transport Assessment Addendum has therefore been submitted with the application, to be read in conjunction with the original Transport Assessment.

### **Site Layout - Masterplan**

194. The overall masterplan layout has been amended slightly, but with the principle of vehicular access to the site and the basement car park via two junctions onto Beresford Avenue unchanged. The easternmost access has been amended to lie along the line of the existing Wycombe Road though, which is acceptable in principle subject to the existing junction onto Beresford Avenue



being straightened to meet at a 90° angle to the highway with a raised entry table. This can be addressed as detailed proposals for Plots P and Q are drawn up at the relevant phase.

195. The siting of the proposed development plots has been amended for Phases 4-7, thus altering the alignment of the routes between them. However, as before, the majority of routes through the site will be designed for pedestrians and cyclists only, with access also provided where necessary for service and emergency vehicles, whilst the main east-west landscaped pedestrian/cyclist route is retained through the centre of the site. The revised layout will therefore continue to provide good permeability through the site by active modes.

#### Parking – wider Masterplan

196. DMP 12 (Parking) and Appendix 1 of Brent's DM Policies would allow up to 3,222 residential car parking spaces, with a further 95 spaces allowed for the employment uses. The size of the proposed basement car park is not intended to change, with a total of 1,482 residential car parking spaces again proposed. The ratio of residential parking spaces/flat will therefore fall to 0.46. This remains within the maximum parking allowance under current DMP standards, as well as being within proposed future allowances of 0.75-1 space per unit set out in the ITP London Plan (which Brent's forthcoming Local Plan will adhere to). The operation of an annual parking permit system for residents, to manage allocation of spaces, through the Car Parking Management Plan is welcomed.

197. In line with the ITP London Plan, it is proposed that parking for at least 3% of dwellings is provided as Blue Badge parking at the outset (i.e. 85 spaces) and the car park design is to be reviewed to establish how this can best be provided, secured by a condition. The Car Parking Management Plan monitoring and management system will then be used to ensure appropriate provision of Blue Badge parking continues to be provided (up to a maximum of 10% of dwellings) as the development is built out and occupied. In addition, at least 20% of spaces will be required to have active electric vehicle charging points at the outset, with all remaining spaces having passive provision. Officers recommend that this is secured by condition.

198. To mitigate potential overspill parking problems being created in the area, funding of £750,000 is secured to enable a CPZ to be introduced in the local area. This has been agreed as phased payments (with £150k already having been provided at the outset of the extant consent), and remains included in the S106 Agreement.

199. The scheme will continue to be 'permit free', so future occupiers will not be entitled to on-street parking permits in the event that a CPZ is introduced in the area, which will provide Brent Council with the ability to ensure overspill parking from the site onto adjoining streets can be regulated. No changes are proposed to the approved commercial parking at this stage, with the additional floorspace proposed through this application not being significant enough to justify any further parking.

#### Parking - Phase 3

200. The submission suggests that 145 car parking spaces will be allocated to Blocks G, H and J – 137 in the basement car park beneath them and eight in the undercroft car park fronting Block J. This is consistent with the parking ratio for the wider masterplan, and is therefore acceptable. Of the 145 spaces, 13 are shown as wide disabled bays at the outset and 29 with active Electric Vehicle Charging Points, in line with London Plan standards. The dimensions shown for the spaces and access aisles all meet standards.

#### Cycle Storage / Parking – wider Masterplan

201. In terms of bicycle parking, the additional 320 flats (116 x 1-bed, 122 x 2-bed & 82 x 3-bed) would require a total of 571 long-stay and 8 short-stay spaces to meet forthcoming draft New

London Plan standards. This is in addition to the 3,416 long-stay and 53 short-stay spaces required under current London Plan standards for the 2,106 previously permitted units within Phases 3-7 of the extant outline consent.

202. These figures have been acknowledged in the submitted Transport Assessment Addendum. However, it is also stated that the usage of bicycle parking will be monitored as the earlier phases of the development are built out and occupied, with a view to making alternative provision in later phases for hire-bicycles and/or folding bikes if bicycle storage areas are not well utilised. Officers consider that this would be considered within the Travel Plan requirements for each phase, as required under the section 106 agreement, and therefore can be assumed that the minimum bicycle parking requirements would be met across the wider scheme. Details of cycle parking for future phases will be submitted as reserved matters applications for each block.

#### Cycle Storage / Parking – Phase 3

203. For two-wheeled transport, 10 motorcycle spaces and 688 bicycle parking spaces are shown in the basement car park, with the latter including 22 large spaces for non-standard bikes and the remainder on two-tier racks. A further 40 spaces on 2-tier racks and 13 enlarged spaces are shown in ground floor storage rooms, along with 13 Sheffield stands (26 spaces) along the frontage of the blocks for visitors. This is sufficient to satisfy London Plan standards and the layouts of the stores provide suitable space for access to the racks and stands.

#### Refuse, delivery and Servicing – wider Masterplan

204. For waste collection, a proposed Operational Waste and Recycling Management Strategy has been submitted. This proposes that a central waste storage area will be provided in the centre of the site (within Block K), with the site management company moving bins between the individual blocks and the central store on a daily basis. Brent's waste contractors have expressed concern with this arrangement, given the large volume of waste that would need to be collected from just one location each week. However it has been agreed that more regular collections from a centralised waste store would be acceptable, with full details of how this would work in practice being agreed by a condition which requires the submission of a Waste Management Plan.

205. As before, a Delivery and Servicing Plan is proposed for the development, which has been submitted with the application. This proposes a number of measures to manage and minimise the estimated 201 daily delivery trips (80 van and 121 HGV) to the development. These include the consolidation of suppliers where possible, pre-booking of delivery slots, encouragement of deliveries outside of peak hours and provision of secure drop-off/pick-up storage facilities within the site. This plan is welcomed and officers consider its implementation should be secured by condition, as per the original extant consent.

#### Refuse, delivery and Servicing – Phase 3

206. Waste storage for the three blocks is also shown at ground floor and basement levels, but for only a fraction of the storage requirement (14 Eurobins and 14 wheeled bins, against a standard of 96 Eurobins). The intention is to rotate these regularly by tug between the stores and the central bin storage area as they become full, with more regular (more than once a week) collections to be sought and agreed by condition.

207. With regard to the street design, 2m (minimum) width footways are shown throughout, increasing to 4.5m in the vicinity of the proposed commercial unit at the front of Block G. The footways are shown set behind verges and loading bays of 2.5m-3m width along the front of Blocks G and H, with an area for loading also indicated in the undercroft car park fronting Block J, to allow deliveries to take place clear of the main access road.

#### Street Layout – wider Masterplan

208. As with the extant outline consent, the proposed hierarchy of streets is welcomed in terms of providing good permeability through the site and over the River Brent via existing bridges, and the introduction of an additional crossing over the River Brent adjacent to the proposed 'Generator' building is welcomed. More detailed highway layouts for each plot will be provided as each of the future Phases 4-7 comes forward and officers recommend a similar condition is attached requiring these details to be approved as reserved matters.

209. A new pedestrian/cycle bridge from the site would continue to be provided over the river Brent between the proposed residential led part of the application site and the proposed 'Generator', which would link in with the existing pedestrian pavement network, and cycle routes would provide an additional link for pedestrians and cyclists over the river, and towards the existing pedestrian/cycle bridge over the North Circular Road and on to major employment destinations within Park Royal and the Old Oak Common redevelopment area. This would also link to the proposed HS2 and Crossrail station which would if delivered provide a major transport hub within the wider area.

210. Under the extant outline consent, the applicants also agreed to provide a further pedestrian/cycle bridge link across the Grand Union Canal, with land for this purpose safeguarded via the section 106 agreement. It has become clear during discussions between the Council, the applicant and the Canal and River Trust that the location of this safeguarded land is not workable, mainly due to the presence of a Thames Water sewer in close proximity to this land. Officers have explored potential alternative locations with colleagues in the LBB Regeneration and Transport teams, however further discussions are required both with colleagues, the applicant and relevant landowners before any agreement is reached. Nevertheless, officers are satisfied that this alternative location can be agreed and secured, either as part of the new section 106 agreement attached to this permission, or as a deed of variation to the original agreement. On this basis, officers are confident that the pedestrian and cycle improvements secured by this additional link would continue to be secured.

211. As with the extant outline consent, stopping up works along Wycombe Road would be sought under S247 of the Town & Country Act 1990. Again, two new access roads along Beresford Avenue would be provided in order to provide access to service vehicles, the underground car parking, the proposed street network and for emergency services.

### Transport Assessment

212. With regard to trip generation and wider transport impacts, the applicants have submitted the same Transport Assessment as applied to the extant outline consent, with the agreed residential trip rates applying to this new scheme. However, an addendum to this has been submitted in order to account for the additional 320 flats proposed under this new application.

213. On this basis, the additional units are estimated to generate 23 arrivals/114 departures in the morning peak hour (8-9am) and 77 arrivals/47 departures in the evening peak hour (5-6pm) by all modes of transport, in addition to the 1,700-1,800 peak hour trips likely to be generated by the approved scheme (i.e. an increase of 7-7.5%).

214. However, as no additional car parking is proposed for the new units, any predicted trips associated with the additional flats have been assigned to other modes of transport. The council's highways officers do not consider that the traffic impact of the enlarged scheme on the surrounding road network is likely to be any worse than for the approved scheme, for which a junction modelling study is currently underway covering six junctions in the area (as agreed under the extant outline consent), with a financial contribution of £400,000 provided towards any identified mitigation works.

215. The previously agreed mitigation is therefore also considered acceptable for this revised scheme, with payment secured via section 106 agreement.

216. For other modes of transport, the additional flats are estimated to generate 53-59 additional peak hour trips by rail/Underground and about 30 additional bus trips per peak hour. Divided by the number of services passing the site, this would amount to approximately three additional passengers per train and one additional passenger per bus.

217. Funding was secured towards station improvements at Stonebridge Park and bus service enhancements under the section 106 agreement in connection with the original Masterplan consent. However, TfL have requested an increased contribution towards bus improvements as a result of the additional uplift of 320 flats sought under the revised Masterplan. While the applicant has not confirmed that they consider this further contribution acceptable, officers consider that the issue would can be resolved through further section 106 discussions, as well during Stage 2 discussions with GLA and TfL. TfL have confirmed that no further contributions to station improvements at Stonebridge Park are sought, with £4.7m having been secured under the original s106 agreement.

218. Similarly, the improvements that have been secured (and are currently under construction) to footways and cycleways along Beresford Avenue and Old North Circular Road are sufficient to accommodate the predicted increases in pedestrian and cyclist trips.

### Construction Management

219. The applicants have submitted an updated Construction Management Plan with the application. This includes updates on predicted delivery vehicle movements over the course of the construction works, which now peak at about 140 daily HGV movements between 2030-2033. Provided that deliveries are pre-booked to avoid peak hours (which would be agreed as part of the DSMP to be required by condition) there is sufficient space within the site to handle this volume of daily deliveries, whilst the access routes via the North Circular Road will ensure such traffic is kept to routes with sufficient capacity to handle the construction traffic. Otherwise, the submitted Construction Plan is consistent with earlier approved versions of the plan and its implementation can again be secured by condition.

### Travel Plans

220. To help to minimise car journeys and encourage greater use of sustainable transport to and from the site, both a Residential Travel Plan and a Framework Travel Plan for the non-residential uses have been prepared.

221. Both aim to reduce the proportion of trips made by car from 22% to 14% over a five-year period. Please note though that the development is proposed to be built-out over a 20-year timeframe, so the Travel Plans need to have a corresponding 25-year minimum lifespan in order to ensure they continues to be applied throughout all phases of the build programme.

222. The Travel Plans are to be managed by a site-wide Travel Plan Co-ordinator (with support from tenant Travel Plan co-ordinators for the major commercial units) and will include a range of measures to support sustainable travel.

223. For the residential travel plan, these include the provision of marketing information and welcome packs to publicise transport options and highlight the health and financial benefits of walking and cycling, the promotion of walking and cycling events, provision of broadband to reduce the need to travel, promotion of car sharing and the introduction of Car Club bays. No information has been provided on any engagement with a potential Car Club operator though to ensure that the requisite financial support will be provided to establish Car Club vehicles on the site and to this end, it is essential that at least two years free membership of the Car Club is offered to all new residents of the development to help to make a scheme viable.

224. The commercial travel plan proposes the provision of transport information through company websites and noticeboards, engagement is promotional walking and cycling campaigns,

promotion of journey planning websites and support for car sharing. The measures are fairly limited though and include no mention of encouraging the provision of interest-free loans to staff for bicycle purchase or public transport season tickets, whilst also making no mention of how car parking within the commercial premises will be managed.

225. The Travel Plans are to be monitored biennially and for the avoidance of doubt, the surveys need to be to a standard compatible with the TRICS and/or i-TRACE methodology.

226. Final versions of the Travel Plans will need to be approved as part of the Reserved Matters applications for each relevant phase, and these are to be secured through the S106 Agreement

### **Accessibility and inclusive design**

227. As highlighted by the Mayor's Accessible London SPG, development should implement inclusive design principles to create an accessible environment. The Design and Access Statement advises that the creation of an inclusive environment is an aspiration for the development and inclusive access would be considered through the design process.

228. As noted in the highways section of the report above, the development would result in a significant improvement to connectivity in the area, including through the pedestrian and cycle routes that would be created through the site and the improvements that are proposed to routes within the surrounding area. Public spaces that are proposed within the site would include recreational routes, and these spaces and paths through the site would serve the existing and new community.

229. The landscaping also shows proposals for the area between Blocks H and J, which is proposed as a landscaped terrace with water features and this would be fully accessible. Some concerns were raised by the highways officer regarding whether the future east-west pedestrian route through the wider Masterplan would provide a continuous step-free route for wheelchairs, however a further plan has been submitted by the applicant confirming there would be a fully step-free route in this location, and is therefore acceptable.

230. Across the site, 90% of the dwellings are proposed to be designed and built to Building Regulations Approved Document M4(2) 'accessible and adaptable dwellings' standard, and 10% would be designed and built to Part M4 (3) 'wheelchair user dwellings' standard in accordance with London Plan standards at Policy 3.8. A condition is attached ensuring details of exactly which dwellings are designated for wheelchair users within Phase 3, with details for later phases secured by Reserved Matters.

231. On this basis, the proposals would therefore ensure that accessible and adaptable accommodation and space are provided within the development and would meet the principles of inclusive design. The proposals therefore comply with Brent and London Plan policy regarding accessibility and inclusive design.

### **Microclimate – Wind Environment**

232. The submitted ES includes an assessment of wind and microclimate impacts. The assessment utilised computer modelling and involved testing of the existing site and proposed development, including those with extant permission in phases 1 and 2a, within a wind tunnel to consider the wind conditions around the development. Assessment was made against the 'Lawson Comfort Criteria' to establish whether the resulting wind conditions would be suitable for the proposed use.

233. The submission confirms that the wind conditions surrounding the site would be similar to existing. For the detailed part of the development, wind conditions are shown to range from being suitable for sitting to being suitable for walking during the windiest season, and the amenity

spaces would be suitable for standing and sitting uses within the summer season. Mitigation measures including the use of balcony screening and landscaping are proposed within Phase 3. For the outline part of the development, wind conditions would range from being suitable for sitting use to strolling use during the windiest season, and the amenity spaces would be suitable for standing and sitting uses within the summer season.

234. Although there would be potential for stronger winds for short periods of time at certain locations within the site, mitigation measures have been identified by the applicants including provision of landscaping and screens to some balconies within the detailed part of the proposals for the development in Phase 3. The incorporation of these measures within the proposals means that the development would provide a suitable standard of comfort for pedestrian uses and in public spaces intended for amenity use, and the precise details would be secured as part of the landscaping condition already recommended by officers. Potential mitigation measures for future phases within the revised Masterplan would be considered as part of future Reserved Matters applications.

235. Overall, it is considered that the development would provide for usable pedestrian environments and amenity space and the wind microclimate would be acceptable for the intended use subject to the implementation of the limited mitigation measures that are identified and which have been included within the detailed part of the development. There would not be unacceptable harm to the amenity of surrounding land or buildings, and the development would be acceptable including in relation to Policy 7.6 of the London Plan.

### **Air Quality**

236. The site is located within an Air Quality Management Area (AQMA). The ES includes an assessment of air quality and potential impacts when the development is operational, as well as the requirement for any mitigation measures. An assessment of impacts of construction-related traffic was not undertaken as traffic data indicated that there would be a negligible increase in air quality as a result of construction traffic.

237. The assessment shows that subject to adequate ventilation design to the basement parking (which would affect the outline development area of the site), air quality on the site would be suitable for end users without any requirement for specific mitigation measures. The design requirement for the ventilation to the basement parking would form part of a future Reserved Matters application, at which time measures would be incorporated to ensure that air quality requirements are met.

238. On completion of the development, the ES assessment shows that potential emissions from the resulting road traffic and from the proposed energy centre would not result in any significant impact on air quality, with dispersion modelling demonstrating that the height of the stack proposed to serve the energy centre would be adequate so as not to result in exceedance of air quality objectives.

239. An Air Quality Neutral Assessment has also been submitted with the application, demonstrating that the development would comply with air quality neutral objectives set out within the Mayor's Sustainable Design and Construction SPG. Off-setting provisions such as green walls planting and screens to absorb or suppress pollutants would be considered as part of the development in line with provisions of the SPG.

240. During construction works, construction impacts including through dust would be managed through inclusion in the Construction Environmental Management Plan (CEMP) that is to be produced, and this would ensure that there are no significant air quality impacts during development. As a result, it is considered that air quality impacts to and as a result of the development are acceptable in accordance with national policy in the NPPF, as well as local and Mayoral policy requirements.

## **Energy and sustainability**

### **Policy background**

241. Planning applications for major development are required to be supported by a Sustainability Statement in accordance with Policy CP19, demonstrating at the design stage how sustainable design and construction measures would mitigate and adapt to climate change over the lifetime of the development, including limiting water use to 105 litres per day. Major commercial floorspace is required to achieve a BREEAM 'Excellent' rating and this also needs to be clearly evidenced. Policy DMP9B of Brent's Local Plan also requires sustainable drainage measures to be adequately implemented.

242. Major 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 5.2. An Energy Assessment is required, clearly outlining how these standards would be achieved and identifying, where necessary, an appropriate financial contribution to Brent's carbon-offsetting fund to compensate for residual carbon emissions.

243. In terms of non-domestic floorspace, the policy target is a 35% on-site reduction, and this must be separately evidenced within a submitted Energy Assessment. However, significant weight is also placed on the Intend to Publish London Plan policy SI2, which applies the zero carbon standard (with 35% reduction on on-site emissions) to both residential and commercial elements of the scheme.

### **Carbon emissions and energy saving**

244. The Planning Statement supporting the application advises that the development is designed to meet sustainable construction standards, and the submission includes an Energy Statement. This explains in detail how the development would meet relevant requirements in relation to energy efficiency and energy supply. The assessment shows that the development would make significant carbon dioxide savings over target rates which would be achieved through energy efficiency measures, the use of combined heat and power, and inclusion of solar photovoltaic (PV) panels to the roofs of Blocks G and H within Phase 3 of the proposal. Potential sites in the later phases may be possible but would be identified during the reserved matters of those phases.

245. The Energy Statement highlights that energy demands of the development have been reduced by measures including through the materials to be used; air tightness; ventilation system selection; efficient space and water heating; efficient lighting; and consideration within the design and layout to mitigate overheating risks.

246. The potential for connection of the site to existing district heat networks was considered as is required by London Plan Policy 5.6. However, there are no existing networks in proximity to the site. The proposals do nevertheless include a site wide heat network, with a decentralised Energy Centre. This would supply heat from the central energy centre proposed beneath Building D which would accommodate a Combined Heat and Power (CHP) facility.

247. The scope to incorporate renewable energy technologies has been considered by the applicant. This assessment indicated that PV panels would be suitable, although the brown roofs proposed to the majority of the site were considered to reduce the area that these would be appropriate. As noted above, the roofs of blocks G and H have been identified as potential locations for PV panels.

248. These measures would result in anticipated carbon dioxide savings of 48.7% for the residential development and 37.4% for the non-residential development, equivalent to 48.6% overall. This would exceed the requirements of the London Plan, and remaining domestic carbon

dioxide emissions would be offset in accordance with the Mayor's Housing SPG, with this offset to be secured via a s106 agreement.

249. The GLA have noted that the development would broadly follow the energy hierarchy, although further details were requested to verify the findings of the Energy Statement and the applicant has provided details as requested. The development would therefore meet relevant energy targets, subject to planning obligations being secured, and is acceptable in accordance with Brent and London Plan policies.

#### Sustainable design and construction

250. In addition to the measures that would ensure energy targets are met, sustainability has been considered throughout the design of the development as set out within the submitted Sustainability Statement which includes discussion of the sustainable design and construction methods, energy and water saving measures, waste reduction techniques and measures to enhance the ecological value of the site that are to be incorporated as part of the development.

251. The Statement highlights the sustainable location of the site with access to public transport and connections for walking and cycling, and notes that through the development there would be significant improvements to existing routes on the site and in the area promoting sustainable transport options. The range of uses that are proposed as part of the development would also help to meet day-to-day needs of the existing and proposed community in the area, reducing the need to travel.

252. Provision for waste and recycling would be made both to serve all future occupiers, and as part of the construction works on the site. Sustainable construction methods would also be utilised including consideration for the selection of materials and management of construction impacts.

253. Surface water would be managed within the site using SuDS, and in addition to energy saving measures as noted above, the applicants have confirmed that flow control devices and water efficient fixtures and fittings would be installed to all homes, targeting a minimum water efficiency standard of 105 litres/person/day. All homes would also be provided with a 'Home Information Manual' that would provide advice and information on operating services within the homes in order to reduce energy and water use. Commercial units would similarly be provided with guidance to reduce their energy and water demand.

254. Brown roofs are proposed to large proportions of the site, and these would provide a range of sustainability benefits including localised cooling and management of surface water, and they would also provide ecological habitats. However, full details of these roofs would be secured by condition 15 and/or reserved matters application(s).

255. A Dynamic Overheating Assessment has been submitted for the detailed area of the development and indicates how overheating risks have been minimised through design measures including solar control glazing and natural and mechanical ventilation to result in an acceptable level of overheating against relevant criteria without the need for air conditioning systems. The layout also avoids excessive solar gains for non-residential uses and these principles would be carried forward to the design of the later phases of development. The GLA requested further details to confirm that comfort recommendations would be met which have been provided by the applicant, and the development is therefore considered to effectively manage potential risks of overheating.

256. The Sustainability Statement notes that the proposed non-residential units would achieve a minimum of BREEAM 'Excellent' standard as is targeted by Core Strategy Policy CP19, Policy 5.15 of the London Plan and Policy SI5 of the ITP London Plan. A requirement for all non-residential floorspace to meet BREEAM 'Excellent' is included in the Heads of Terms for the Section 106 agreement as proposed.



## Urban Greening Factor

257. Policy 5.10 of the London Plan and Policy G5 of the ITP London Plan emphasise the importance of urban greening in development. The proposal would have an Urban Greening Factor (UGF) of 0.36 which falls short of the target score of 0.4 for residential developments. However, the strategy has been considered by the GLA to be of a high quality and consists of high scoring greening factors. Given the high quality of the greening proposed, the shortfall is considered acceptable in this instance.

## Ground Condition, Soils and Contamination

258. The site is previously developed and the past use as an industrial estate together with nearby uses could have resulted in contamination. The Environmental Statement supporting the application therefore includes a full assessment of ground conditions and the potential for any impacts, as was submitted with the original Masterplan.

259. This assessment demonstrates that there are potential sources of contamination from contaminated soils, made ground, buried infrastructure and organic soils that could result in ground gas or soil vapour concentrations. However, implementation of a Construction Environmental Management Plan (CEMP) during construction works would ensure that there are no unacceptable impacts to the surrounding environment or to ground workers. In addition, provision would be made for remediation as part of the development which would mean that there would be no residual risk to future occupiers, and the risk to the environment would be reduced in comparison to the existing site circumstances. Measures to manage ongoing risks of contamination would be provided such as well-maintained petrol and oil interceptors. The ES therefore demonstrates that the development would achieve safe and suitable conditions for end users and that potential risks during construction works would be managed.

260. The London Plan supports remediation of contaminated land and making beneficial use of such sites, and the reduced risk of contamination and pollution from the site would be a further potential benefit of the proposals being brought forward on the site.

261. The Environmental Health Officer has advised that the submitted reports provide a comprehensive review of previous site investigations and note that remediation works will be needed. Therefore conditions to ensure that a site investigation, remediation and verification details are submitted.

262. The development also includes restoration works to the waterside edges of the application site, and further details of measures to ensure ground stability as part of these works would be required by condition.

263. Appropriate measures would therefore ensure that the development would not activate or spread contamination to the surrounding environment, or in land instability, and there would be no unacceptable risk to future occupiers. The land would therefore be suitable for the intended use. Implementation of necessary measures, including for management of works and provision for remediation would be secured by condition, and on this basis the development would be acceptable in accordance with relevant policies.

## Flood Risk and Run-Off

264. The majority of the northern part of the application site is Flood Zone 1 (low probability of fluvial flooding), although there is an area of Flood Zone 2 (medium probability) at the lower lying north eastern part of the site. The southern part of the site is within Flood Zone 3a (higher probability), with an area of Flood Zone 3b (functional flood plain) at the south. There is a low probability of surface water runoff flooding to the site.

265. National and local policy require that development does not increase flood risk and that development is resilient to flooding. The NPPF also requires a sequential approach to steer development to areas with the lowest probability of flooding.
266. The application is supported by a Flood Risk Assessment which includes a Sequential Test Assessment, and a Drainage Strategy. The Flood Risk Assessment demonstrates how the potential risk of and from flooding for the proposed development has been considered, and illustrates how the development would increase flood storage capacity on the site. Flood resilience and resistance measures have been identified and would ensure that the development is safe.
267. Within the site, the proposed layout responds to flood risk with residential development (which is more vulnerable to flood risk) to the northern part of the site within Flood Zones 1 and 2 and with uses at ground floor level generally comprising less vulnerable commercial uses. Employment uses which are less vulnerable would also be accommodated on the southern part of the site, although no built structures are proposed within the Flood Zone 3b functional floodplain area.
268. The Sequential Test Assessment report has considered the potential to accommodate the development proposed on sites at lower risk of flooding, and it is considered that the submitted report does demonstrate that there would be no sequentially preferable sites to accommodate the development. The proposal therefore satisfies the requirements of the Sequential Test set out within national policy and guidance.
269. While the Environment Agency initially sought further detail around the provision of flood compensation measures, following clarification from the applicant the Environment Agency have no objection to the development on flood risk grounds.
270. The Environment Agency did also request further information in relation to works to the banks of the River Brent to demonstrate that it would be possible to meet standards required in order to address flood risk and ecology considerations. However following further discussions and clarification from the applicant, the EA have confirmed they are satisfied that the proposals would be acceptable in principle, subject to a condition requiring full details of works to the river banks are submitted for their approval before any relevant works commence.
271. With regard to surface water on the site, the Drainage Strategy submitted with the application illustrates that the development would incorporate a SuDS strategy. This would provide betterment to the existing discharge rates from the site by restricting surface water flow to three times greenfield runoff rate; a substantial reduction on the existing site circumstances. While the underlying geology means that surface water ground infiltration techniques cannot be used, the development incorporates swales and permeable paving to manage flows, and modular attenuation tanks would be provided to control discharge rates. Although it was initially proposed that surface water would be discharged to the River Brent and Grand Union Canal, discharge to the canal is no longer proposed. Provision would be made for pollution control and for management and maintenance of the drainage network and SuDS systems which would ensure protection for the environment and the long-term performance of the drainage network.
272. The main site falls within Flood Zone 1 and the risk of flooding is low. The River Brent is in very close proximity and the flood risk is high at this location. The development floor levels would be much higher than the flood level. The developer are reducing the surface water discharge from 2200 l/sec to 125 l/sec and this would reduce the flood risk in this area. Therefore, they are satisfied with the proposals.
273. As such, the development proposed would make adequate provision for the management of flood risk and surface water within the site and there would not be unacceptable impacts to the surrounding area. The proposals are therefore acceptable in accordance with national, local and Mayoral policy requirements.

## **Fire Safety**

274. Policy D12 (Fire Safety) of the ITP London Plan seeks to ensure that new development is designed to incorporate appropriate features which reduce the risk to life in the event of fire, are constructed in a way to minimise the risk of fire spread, provide suitable means of escape and adopt a robust strategy for evacuation.

275. The applicants have provided a fire strategy which seeks to address the points raised above, the key points of which are summarised below:

- All residential units (including the affordable housing) will be fitted with fire detection systems and sprinklers, and all corridors would be fitted with smoke extraction systems. The proposed basement(s) will also be fitted with a fire detection and alarm system.
- The proposed external facades would predominantly be brick, and would incorporate non-combustible insulation.
- A full fire evacuation strategy would be provided for all residents on a building by building, phase by phase basis.
- With regard to emergency vehicle/fire apparatus access, access points are proposed to be located within 18m of the main entrance to each residential core, with fire hydrant points located within 90m of inlets, in line with LFB guidance. The proposed vehicular access across the development would allow for fire apparatus access to within the vicinity of all the proposed buildings.

276. The London Fire Brigade were consulted, however no response has been received. Nevertheless, approval by the Fire Brigade would be required through the Building Regulations and for the purpose of this planning application, there is no reason to believe that the layout of the development could not achieve compliance. The London Fire Brigade would also be consulted on any subsequent Reserved Matters application.

277. The GLA have assessed the submitted details consider that the measures outlined in the fire safety statement are sufficient, but a detailed strategy for each phase should be secured via condition, which has been recommended by officers. Further information on fire safety would be secured for later phases during the relevant reserved matters applications.

## **Waste Water**

278. There is a network of sewers serving the existing site, and in addition to surface water as considered above, the submitted Drainage Strategy Report provides details of how foul water would be managed within the development.

279. The Strategy advises that the proposals for waste water have considered existing capacity in the area, with the Phase 1 development intended to discharge to the public foul sewer in Beresford Avenue and the remainder of the site to discharge to the Brent Valley trunk sewer (northern site), and the public sewer adjacent to the River Brent (southern site). Thames Water have not raised an objection to the application but have advised that the existing foul water network requires upgrading to accommodate the full needs of the development and have recommended conditions to provide for details of phasing of development and provision for supporting infrastructure.

280. Thames Water have also requested further details of piling works on site during construction to ensure that there is no impact on existing underground sewage infrastructure, and informatives are also suggested.

281. Subject to recommended conditions, the development would ensure appropriate provision is made for waste water and is acceptable in accordance with local and Mayoral policies.

## **Archaeology**

282. A Desk-Based Archaeological Assessment and Heritage statement were submitted as part of the previous application. These highlighted that the site was considered to have low archaeological potential, including as a consequence of the past use of the site and associated ground disturbance and that while there could be previously unknown archaeological remains, these are likely to be of low importance. The proposed scheme would not have materially different impacts on archaeology/heritage than this consented scheme. As such, these elements have been excluded from the scope of the ES. However, the relevant Archaeological and Heritage Statements were attached to the appendices of the ES.

283. The development would not therefore require any archaeological mitigation, would not cause harm to archaeological assets, and complies with relevant policies. No objection has been received from English Heritage

## **Ecology and Nature Conservation**

284. The application is supported by Ecological Baseline Reports including an Ecological Update and Preliminary Ecological Appraisal, Aquatic Ecology Baseline Report, and Reptile Method Statement which were submitted with the consented scheme as part of that ES. The proposal does not materially change the impact of the scheme on biodiversity and these documents are considered to remain relevant.

285. These reports highlight that the site currently has limited ecological habitats and biodiversity value, with habitats restricted to scattered trees. However, the site is adjacent to the River Brent and Grand Union Canal which are both designated as Sites of Importance for Nature Conservation (SINCs). The submitted assessments recognise the potential for impacts of development on these, and also illustrate the potential for enhancement arising as a consequence of the proposed development.

286. During the development process, mitigation measures are proposed to ensure that there would be no harm to ecology. These would include avoiding harm to reptiles, managing invasive species, and consideration for the aquatic environment, and further details of measures would be provided through method statements.

287. The development includes extensive areas of landscaping and open space provision, together with planting that would all provide for increased opportunities for biodiversity. The provision of extensive areas of brown roofs would further support ecology on the site. As part of the development, there would be works to restore the waterside edges of the site and significant areas of habitat creation are proposed to be concentrated within the corridors of the River Brent and canal, including the Riverside Meadows area at the east which is proposed to include a range of appropriate species. These improvements are welcomed and would improve the contribution of the site to the ecological value of the local area.

288. The development proposals would therefore maintain and enhance biodiversity and ecology on the site and would comply with relevant national requirements and local and Mayoral policy.

## **Trees**

289. The application is supported by an Arboricultural Impact Assessment which considers the impact of the development on existing trees on the site. This assessment indicates that these existing trees are of varying quality with none of the highest quality (category A).

290. The development proposals would result in the removal of trees and hedgerows from the site, including 31 trees subject to a Tree Preservation Order (TPO). However, only one of these is

category B tree with the rest being category C, of low quality or value. Where trees are to be retained, the Assessment indicates there would be protection provided to ensure their longevity.

291. While trees would be removed from the site, the development includes for significant replacement planting as part of the extensive landscaping proposals, which go further than the outline Masterplan and offer significant benefits to the wider area. Approximately 220 trees would be planted as part of the Phase 3 proposals, which would comprise species appropriate to the site and area, and the proposed replacement trees would make a positive and longer-term contribution to the local landscape. This is also reflected in the Urban Greening Factor score of 0.36, which is considered to be very good given the industrial, brownfield nature of the existing site.

292. Given this mitigation and the enhancement of the site and wider Beresford Avenue through the significant new tree planting, the removal of the proposed trees is acceptable and complies with relevant Brent and Mayoral policy.

## **Operational Waste**

### **Revised Masterplan**

293. As with the original Masterplan, this revised application is accompanied by an Operational Waste and Recycling Management Strategy which provides details of the estimated waste arising from the development and of how these would be managed. The Strategy has been updated to reflect the 320 additional units proposed across the site.

294. The Strategy aims to contribute to national and local targets for waste minimisation, recycling and reuse, achieve high standards of waste and recycling performance and provide a convenient, clean and efficient waste management strategy for the site.

295. The Strategy estimates that for Phase 3, the development would produce approximately 33,760 litres of waste per week. Estimates are also provided for the outline element of the site, with a predicted 279,800 litres of storage capacity required on a weekly basis. However, these would be subject to the actual detail of development as it comes forward.

296. The Strategy advises that full provision for storage of recyclable and non-recyclable waste would be made for the development, including for mixed dry recyclables, food waste and residual waste. A permanent centralised waste storage facility is proposed to be built as part of the Phase 4 design, with the expectation that it would be located within Building K, which would service the entirety of the new development (with the exception of Phase 1) and have separate storage areas for residential and commercial waste.

297. Until that permanent facility is provided, a temporary waste storage facility would be provided within Phase 3, as agreed in March 2020 as part of a discharge of condition application (ref. 20/0355). Details of the new location of the temporary Central Waste Storage Facility will be submitted as part of the submission to discharge Condition 27 in respect of Phase 2a. This will ensure that Phase 3 can be delivered and that the relevant parts of the development can be served by a temporary Central Waste Storage Facility as necessary.

298. The Operational Waste and Recycling Management Strategy submitted demonstrates that there would continue to be sufficient capacity to manage waste as part of the development in accordance with requirements, despite the additional uplift in residential units proposed, and is considered acceptable.

### **Operational Waste for Phase 3**

299. With regard to refuse storage and collection, residents in Buildings G and H will carry their separated refuse, MDR and food waste to their allocated refuse stores located in the basement level via the stairs or internal lifts. The refuse stores have been sufficiently sized for a daily

collection of the bins by the internal management team. They will accommodate at least two bins for each waste stream (refuse, MDR and food waste). Once full, the bins will be replaced with empty ones and transferred by the internal management team to the temporary central waste storage facility, which will have sufficient storage capacity to accommodate the total number of bins required for Buildings G and H. The same method would be used when the permanent facility becomes available.

300. Residents in Building J will carry their separated refuse, MDR and food to the refuse store located on the ground floor level via the internal lifts. The refuse store has been sufficiently sized for a daily collection of the bins by the internal management team. It will accommodate at least two bins for each waste stream (refuse, MDR and food waste). The bins would then be transferred to the temporary (and then permanent) waste storage facility in the same way as Buildings G and H.

301. Phase 3 only includes 74 sqm of flexible commercial floorspace, however an estimated 429 litres of waste would be produced per week, requiring 2 x 240l bins (one for refuse and one for mixed recycling). The interim storage of non-residential waste will be allocated within the curtilage of individual units, with commercial tenants being responsible for the provision of internal refuse and recycling storage to suit their own operations. With regard to collection, the internal management team will again collect this from individual non-residential units and transfer it to the separate non-residential waste storage area within the temporary Central Waste Storage Facility with the aid of tow tugs, ready for collection by an external contractor(s). The specific days and times for collection of non-residential waste from the temporary Central Waste Storage Facility will be agreed within the lease agreements for these units, so as not to coincide with the collection of residential waste, which will take priority, and this is considered appropriate.

302. To ensure this would work in practice, including the opportunity for review of working practices as the development evolves, condition is recommended to secure a Waste Management Scheme be provided to, and approved by the Local Planning Authority for each relevant building/phase. A further condition is recommended to ensure that later phases are in accordance with Brent's Waste Planning Guidance, unless otherwise agreed in writing by the Local Planning Authority.

#### Site Waste Management Plan – construction phases

303. In addition to waste once the development is occupied, the proposal would result in generation of waste during the construction process. The submitted Sustainability Statement advises that a Site Waste Management Plan would be prepared prior to construction to establish ways to minimise waste at source, consider reuse and recycling of materials both on and off site and prevent illegal waste activities.

304. The Sustainability Statement states that as part of their commitment to divert construction waste from landfill, the applicant would monitor and record performance against a target benchmark of at least 95% non-hazardous waste (by volume) to be diverted from landfill. Waste minimisation measures that may be considered to achieve this are highlighted as opportunities to reduce and avoid waste from excavation or groundworks; design standardisation of components and use of fewer materials; design for off-site or modular build; return of packaging for reuse; community reuse of surplus materials; and engaging with supply chains and including waste minimisation incentives and targets in tenders and contracts.

305. These measures would minimise the generation of waste during construction work and would reduce the impact of development on natural resources, and are supported.

#### **Conclusion**

306. 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

## **S106 DETAILS**

The application requires a Section 106 Agreement, in order to secure the following benefits:-

1. Payment of the Council's legal and other professional costs on completion of the deed in (i) preparing and completing the agreement and (ii) monitoring its performance;
2. Notification of material start of the revised Masterplan 20 days prior to commencement and associated covenant to not implement the underlying permission for Phases 3-7 (i.e. the development being superseded);
3. Continued adherence to Considerate Constructors scheme;
4. The Owner will provide a minimum of 35% of the dwellings (by habitable room) within the Development as Affordable Housing;
  - a. Tenure
    - i) 70% Affordable Rented Units at a rent of no more than 80% of local openmarket rent (including service charge where applicable) and capped at Local Housing Allowance rates;
    - ii) 30% Shared Ownership (subject to a £90,000 household income cap to be increased in accordance with the London Plan AMR 1 );
    - iii) in relation to the affordable housing provision arising from the proposed additional homes (320 dwellings, of which 35% (by habitable room) are to be affordable), the tenure breakdown is as follows:
      - 30% London Affordable Rent;
      - 40% Affordable Rent; and
      - 30% Shared Ownership (subject to a £90,000 household income cap to be increased in accordance with the London Plan AMR).
  - b. Freehold (or minimum 125 year leasehold) disposal of all Affordable Units to an approved Registered Provider;
  - c. 100% Council nomination rights to all Affordable Rented Units on first lettings, 75% nomination rights on subsequent lettings, secured under appropriate Nominations Agreement;
  - d. No more than 50% of the Private Dwellings per Phase shall be occupied until the Affordable Housing has been constructed and transferred to an approved RP(freehold or 125 year lease). Ready for occupation prior to 70% of Private Dwellings being occupied.
5. Early Stage Review Mechanism

In the event that the development has not been Substantially Commenced within the agreed timescales for the first phase of the Revised Masterplan (subject to extensions in the event of specified force majeure events), an appropriate early-stage review mechanism will secure the provision of additional on-site affordable housing (subject to the viability review mechanism demonstrating that the development can support it). The viability review wording to be agreed following further discussions.
6. Sustainability / Carbon
  - a. To provide for a connection to a Decentralised Heat / Energy Network should one be implemented in the area in the future;

- b. All residential units will be constructed to be compliant with minimum standards for water consumption (105 litres/person/day);
- c. All residential units to meet zero carbon target (off-site energy efficiency measures or a cash-in-lieu payment for failure to meet);
- d. All non-residential units to achieve a 35% reduction in carbon emissions over Building Regulations Part L 2013 (off-site energy efficiency measures or a cash-in-lieu payment for failure to meet);
- e. Owner to pay 50% of the carbon offset contribution prior to Material Start per residential phase.
- f. To prepare and obtain approval of an Energy Assessment for the non-residential element. Once approved, the recommendations of the assessment shall be implemented.
- g. The Owner shall prepare and submit a Carbon Review Assessment for the non-residential phases of development no later than 40 working days after first occupation.

## 7. Health Care Facility

The developer will provide up to 800sqm (GIA) of fitted out health centre floorspace (GP Surgery) prior to Occupation of 600 units, unless otherwise agreed in writing by the LPA. The final quantum of floorspace, specifications of the fit out and commercial terms must be agreed by the CCG and the Council.

## 8. Training and employment

- a) Development to be delivered in accordance with the approved Construction Employment and Training Plan under the extant planning permission;
- b) Requirement for approval of an Operational Employment and Training Plan (as per specifications set out by the extant permission) 6 months before Practical Completion of the relevant phase;
- c) Use reasonable endeavours to continue engagement with Brent Works as per the extant planning permission and reasonable endeavours obligation to employ 20% Local People in operational phase; and
- d) Report 3 months from Practical Completion of the relevant Phase.

## 9. Employment

As per the relevant detailed consents, all employment floorspace shall be delivered under the extant consent (Phases 1, 2 and the Generator). For completeness, this comprises.

- a) Delivery of the Generator prior to the commencement of Phase 4b;
- b) A minimum of 1,390 sqm (GIA) of temporary floorspace referred to as the Creative Quarter will be made available for Occupation no later than 24 months post Commencement of Superstructure Works of Phase 1;
- c) The provision of 380 sqm GIA of permanent 'Affordable Workspace' (Use Class B1) at no more than 50% of the market rate, prior to the occupation of more than 600 units delivered pursuant to the extant consent (to the extent not already delivered by the extant planning permission);
- d) Affordable Workspace to be occupied in accordance with the Affordable Workspace Plan (to be approved before Occupation of any part of the Affordable Workspace).

## 10. Travel Plan

- a) The development shall be implemented and comply with all approved construction, residential and commercial travel plans unless otherwise agreed in writing by the Council.
- b) The Owner will retain the incumbent Travel Plan co-ordinator unless otherwise agreed in writing by the Council.

## 11. CPZ Contribution



- a) A contribution of £150,000 to be paid when called for by the Council towards the carrying out by the Council of a consultation on new and extended CPZ's in the vicinity of the site (unless already paid pursuant to the extant planning permission).
- b) A further £600,000 contribution to be paid when called for by the Council (after Commencement of Development) in the event that a CPZ scheme (new or extension) is approved for implementation and only in the event that it has not already been paid by the extant planning permission.

## 12. Bus Service Contribution

Any outstanding contributions owed of the already agreed £4.7 million to be paid towards the provision of bus service improvements in the vicinity of the Development. The first three tranches of the Bus Services Contribution are anticipated to arise during development pursuant to the extant permission, with the fourth and fifth tranches falling due during development pursuant to the slot-in permission.

## 13. Stonebridge Park Station Contribution

A contribution of up to £2 million to be paid towards improvements to gateline capacity at Stonebridge Park Station, to be paid only where payment has not yet been made under the extant planning permission.

## 14. Parking Permit Restriction

A parking permit restriction agreement withdrawing the right of future occupiers of the development to on-street parking permits.

## 15. Highway Works

a) Undertaking of local highway junction modelling to the satisfaction of TfL and Brent Council at the following junctions, unless otherwise agreed as unnecessary by TfL and Brent Council:

1. A406 - Abbey Road
2. Ealing Road - Mount Pleasant
3. Ealing Road - Bridgewater Road
4. A406 Hanger Lane Junction
5. A406 - A404 Harrow Road
6. Ealing Road - Carlyon Road

b) To the extent not already paid pursuant to the extant permission Funding of mitigation measures identified through the junction modelling and agreed by TfL and Brent Council as being required as a result of the development, up to £400,000.

c) Safeguarding of land for a period of 25 years following completion of Phase 2 in location of originally proposed New Footbridge across the Grand Union Canal (exact location to be agreed) development site to link the site to the canal towpath. Requirement to offer to transfer the safeguarded land to the Council at nil consideration upon the Council's request.

d) Developer to secure that relevant interests in the Wycombe Road Land and Green Land are bound by the obligations in the agreement before making a Material Start on those areas of land.

## 16. Public Open Space

a) To prepare and obtain approval of a Public Realm and Open Space Delivery Plan that sets out appropriate delivery, maintenance and management measures.

b) To prepare and obtain approval of a Public Realm and Open Space Management Plan.

## 17. Other

- a) To prepare and obtain approval of a Public Art Strategy that sets out the Developer's proposals for the provision of Public Art within the development (to the extent that a strategy has not already been prepared and approved under the extant planning permission). The development is to be delivered in accordance with the approved Public Art Strategy.
- b) Indexation of contributions in line with date of original permission
- c) Any other planning obligation(s) considered necessary by the Head of Planning.

## CIL DETAILS

This application is liable to pay **£7,245,114.77** \* under the Community Infrastructure Levy (CIL).

We calculated this figure from the following information:

Total amount of eligible\* floorspace which on completion is to be demolished (E): 0 sq. m.

Total amount of floorspace on completion (G): 26474 sq. m.

Use	Floorspace on completion (Gr)	Eligible* retained floorspace (Kr)	Net area chargeable at rate R (A)	Rate R: Brent multiplier used	Rate R: Mayoral multiplier used	Brent sub-total	Mayoral sub-total
(Brent) Dwelling houses	20147	0	20147	£200.00	£0.00	£5,990,134.82	£0.00
(Brent) Shops	72	0	72	£40.00	£0.00	£4,281.43	£0.00
(Brent) Social housing	6255	0	6255	£200.00	£0.00	£1,859,745.54	£0.00
(Mayoral) Dwelling houses	20147		20147	£0.00	£60.00	£0.00	£1,246,244.7
(Mayoral) Shops	72		72	£0.00	£60.00	£0.00	£4,453.75
(Mayoral) Social housing	6255		6255	£0.00	£60.00	£0.00	£386,919.20

BCIS figure for year in which the charging schedule took effect (Ic)	224	323
BCIS figure for year in which the planning permission was granted (Ip)	333	
<b>TOTAL CHARGEABLE AMOUNT</b>	<b>£7,854,161.79</b>	<b>£1,637,617.72</b>

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

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

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

## DRAFT DECISION NOTICE



# Brent

## DRAFT NOTICE

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

## DECISION NOTICE – APPROVAL

Application No: 20/2784

To: Rebecca Burnhams  
QUOD  
Ingeni Building  
17 Broadwick Street  
London  
W1F 0DE

I refer to your application dated **29/09/2020** proposing the following:

Hybrid planning application comprising:-

Outline planning permission for the demolition of existing buildings and structures on the site, all site preparation works and redevelopment to provide new buildings to accommodate new homes (Use Class C3), flexible commercial uses, new basement level, associated cycle and vehicle parking, new vehicular accesses, associated highway works to Beresford Avenue, landscaping and creation of new public and private open space, ancillary facilitating works, various temporary meanwhile uses, interim works and infrastructure with all matters reserved - appearance, access, landscaping, layout and scale.

Detailed planning permission for Phase 3 (Buildings G, H and J) for the demolition of existing buildings and structures, all site preparation and infrastructure works and the development of new homes (Use Class C3) and flexible commercial floorspace; together with new basement level, associated storage, cycle and vehicle parking, new vehicular accesses, associated highway works to Beresford Avenue, landscaping and creation of new public and private open space, ancillary facilitating works.

APPLICATION SUBJECT TO AN ENVIRONMENTAL STATEMENT

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

at **Land Former 17 Northfields, Beresford Avenue, Wembley, HA0 1NW (Known as "Grand Union")**

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: 02/02/2021

Signature:

**Gerry Ansell**  
Head of Planning and Development Services

**Notes**

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

DnStdG

## SUMMARY OF REASONS FOR APPROVAL

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

*Adopted Policy*

- The National Planning Policy Framework (2019)
- The London Plan (2016 – Consolidated with alterations since 2011)
- Brent's Core Strategy (2010)
- Brent's Development Management Policies (2016)
- Brent's Wembley Area Action Plan (2015)

*Emerging Policy*

- The Intend to Publish London Plan (2020)
- Brent's Local Plan (Reg 19 Version – 2019)

*Supplementary Planning Guidance / Documents*

- Mayor of London's Affordable Housing and Viability SPG (2017)
- Mayor of London's Housing SPG (2016)
- SPD1 Brent Design Guide (2018)
- Brent's Basements SPD (2017)

1

- 1 The detailed element of the development hereby authorised must be begun not later than the expiration of 6 years from the date of this permission, failing which the permission shall be of no effect.

Reason: This condition is imposed by virtue of the provisions of the Planning & Compulsory Purchase Act 2004 and to prevent the accumulation of unimplemented planning permissions.

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

**Outline Drawings:**

Site location Plan	NGU-SRO-ZZ-00-DR-A-02100 Rev P01
Parameter Plan Detailed and Outline Components	NGU-SRO-ZZ-00-DR-A-02110 Rev P01
Parameter Plan Ground Floor Level Heights (FFL)	NGU-SRO-ZZ-00-DR-A-02111 Rev P01
Parameter Plan Ground Floor and Above Plot Extent	NGU-SRO-ZZ-00-DR-A-02112 Rev P01
Parameter Plan Maximum Building Heights	NGU-SRO-ZZ-XX-DR-A-02113 Rev P01
Parameter Plan Access	NGU-SRO-ZZ-00-DR-A-02114 Rev P01
Parameter Plan Open Spaces	NGU-SRO-ZZ-XX-DR-A-02115 Rev P01
Parameter Plan Basement Extent	NGU-SRO-ZZ-B1-DR-A-02116 Rev P01
Parameter Plan Demolition	NGU-SRO-ZZ-XX-DR-A-02117 Rev P01

**Phase 3 Drawings:**

Plot G & H Basement Plan	NGU-SRO-BZZ-B1-DR-A-02119 Rev P01
Plot G, H & J Ground Floor Plan	NGU-SRO-ZZ-00-DR-A-02120 Rev P02
Plot G, H & J First Floor Plan	NGU-SRO-ZZ-01-DR-A-02121 Rev P01
Plot G, H & J Second Floor Plan	NGU-SRO-ZZ-02-DR-A-02122 Rev P01
Plot G, H & J Third - Fifth Floor Plan Rev P01	NGU-SRO-ZZ-XX-DR-A-02123
Plot G, H & J Sixth Floor Plan	NGU-SRO-ZZ-06-DR-A-02124 Rev P01
Plot G, H & J Seventh - Ninth Floor Plan	NGU-SRO-ZZ-XX-DR-A-02125 Rev P01
Plot G, H & J Tenth Floor Plan	NGU-SRO-ZZ-10-DR-A-02126 Rev P01
Plot G, H & J Eleventh - Thirteenth Floor Plan P01	NGU-SRO-ZZ-XX-DR-A-02127 Rev
Plot G, H & J Fourteenth Floor Plan	NGU-SRO-ZZ-14-DR-A-02128 Rev P01
Plot G, H & J Fifteenth - Twenty Fourth Floor Plan NGU-SRO-ZZ-XX-DR-A-02129 Rev P01	
Plot G, H & J Twenty Fifth Floor Plan	NGU-SRO-ZZ-25-DR-A-02130 Rev P01
Plot G, H & J Roof Plan	NGU-SRO-ZZ-26-DR-A-02131 Rev P01
Plot G, H & J Street Frontage Elevation A-A NGU-SRO-ZZ-XX-DR-A-02201 P02	
Plot G, H & J Green Finger Frontage Elevation B-B NGU-SRO-ZZ-XX-DR-A-02202 P02	
Plot G, H & J Short Elevations C-C D-D	NGU-SRO-ZZ-XX-DR-A-02203 P01
Plot G, H & J Long Section Q-Q	NGU-SRO-ZZ-XX-DR-A-02301 P01

Plot G Ground Floor Plan	NGU-SRO-BG-00-DR-A-02151 Rev P01
Plot G First Floor Plan	NGU-SRO-BG-01-DR-A-02152 Rev P01
Plot G Typical Floor Plan	NGU-SRO-BG-XX-DR-A-02153 Rev P01
Plot G Terrace Level Plan	NGU-SRO-BG-06-DR-A-02154 Rev P01
Plot G Typical Upper Floor Plan	NGU-SRO-BG-XX-DR-A-02155 Rev P01
Plot G Roof Plan	NGU-SRO-BG-10-DR-A-02156 Rev P01
Plot H Ground Floor Plan	NGU-SRO-BH-00-DR-A-02157 Rev P02
Plot H First Floor Plan	NGU-SRO-BH-01-DR-A-02158 Rev P01
Plot H Typical Floor Plan	NGU-SRO-BH-XX-DR-A-02159 Rev P01
Plot H Terrace Level Plan	NGU-SRO-BH-10-DR-A-02160 Rev P01
Plot H Typical Upper Floor Plan	NGU-SRO-BH-XX-DR-A-02161 Rev P01
Plot H Roof Plan	NGU-SRO-BH-14-DR-A-02162 Rev P01
Plot J Ground Floor Plan	NGU-SRO-BJ-00-DR-A-02163 Rev P01
Plot J First Floor Plan	NGU-SRO-BJ-01-DR-A-02164 Rev P01
Plot J Typical Lower Floor Plan	NGU-SRO-BJ-XX-DR-A-02165 Rev P01
Plot J Typical Mid Floor Plan	NGU-SRO-BJ-XX-DR-A-02166 Rev P01
Plot J Typical Upper Floor Plan	NGU-SRO-BJ-XX-DR-A-02167 Rev P01
Plot J Roof Amenty Floor Plan	NGU-SRO-BJ-25-DR-A-02168 Rev P01
Plot J Roof Plan	NGU-SRO-BJ-26-DR-A-02169 Rev P01
Plot G Elevations E-E F-F	NGU-SRO-BG-XX-DR-A-02251 Rev P01
Plot G Elevations G-G H-H	NGU-SRO-BG-XX-DR-A-02252 Rev P01
Plot H Elevations I-I J-J	NGU-SRO-BH-XX-DR-A-02253 Rev P01
Plot H Elevations K-K L-L	NGU-SRO-BH-XX-DR-A-02254 Rev P02
Plot J Elevations M-M N-N	NGU-SRO-BJ-XX-DR-A-02255 Rev P01
Plot J Elevations O-O P-P	NGU-SRO-BJ-XX-DR-A-02256 Rev P01
Plot J Section R-R	NGU-SRO-BJ-XX-DR-A-02351 Rev P01
Elevation Bay Study - G - Large Grid	NGU-SRO-BG-XX-DR-A-02401 Rev P01
Elevation Bay Study - G - Small Grid	NGU-SRO-BG-XX-DR-A-02402 Rev P01
Elevation Bay Study - G - Entrance	NGU-SRO-BG-XX-DR-A-02403 Rev P01
Elevation Bay Study - G - Retail	NGU-SRO-BG-XX-DR-A-02404 Rev P01
Elevation Bay Study - H - Large Grid	NGU-SRO-BH-XX-DR-A-02405 Rev P01
Elevation Bay Study - H - Small Grid	NGU-SRO-BH-XX-DR-A-02406 Rev P01
Elevation Bay Study - H - Entrance	NGU-SRO-BH-XX-DR-A-02407 Rev P01

Elevation Bay Study - J	NGU-SRO-BJ-XX-DR-A-02408 Rev P01
Elevation Bay Study - J	NGU-SRO-BJ-XX-DR-A-02409 Rev P01
Elevation Bay Study - J	NGU-SRO-BJ-XX-DR-A-02410 Rev P01
Elevation Bay Study - J	NGU-SRO-BJ-XX-DR-A-02411 Rev P01
Elevation Bay Study - J	NGU-SRO-BJ-XX-DR-A-02412 Rev P01

Apartment Layouts (BLOCK G) Type AR1 1B/2P NGU-SRO-BG-XX-DR-A-02801 Rev P01

Apartment Layouts (BLOCK G) Type AR2 1B/2P NGU-SRO-BG-XX-DR-A-02802 Rev P01

Apartment Layouts (BLOCK G) Type AR3 2B/3P NGU-SRO-BG-XX-DR-A-02803 Rev P01

Apartment Layouts (BLOCK G) Type AR5 1B/2P NGU-SRO-BG-XX-DR-A-02804 Rev P01

Apartment Layouts (BLOCK G) Type AR6 2B/3P NGU-SRO-BG-XX-DR-A-02805 Rev P01

Apartment Layouts (BLOCK G) Type AR8 1B/2P NGU-SRO-BG-XX-DR-A-02806 Rev P01

Apartment Layouts (BLOCK G) Type AR8W 1B/2P NGU-SRO-BG-XX-DR-A-02807 Rev P01

Apartment Layouts (BLOCK G) Type AR9 2B/3P NGU-SRO-BG-XX-DR-A-02808 Rev P01

Apartment Layouts (BLOCK G) Type AR9W 2B/3P NGU-SRO-BG-XX-DR-A-02809 Rev P01

Apartment Layouts (BLOCK G) Type AR10 2B/3P NGU-SRO-BG-XX-DR-A-02810 Rev P01

Apartment Layouts (BLOCK G) Type AR10W 2B/3P NGU-SRO-BG-XX-DR-A-02811 Rev P01

Apartment Layouts (BLOCK G) Type AR11 2B/3P NGU-SRO-BG-XX-DR-A-02812 Rev P01

Apartment Layouts (BLOCK G) Type AR11W 2B/3P NGU-SRO-BG-XX-DR-A-02813 Rev P01

Apartment Layouts (BLOCK G) Type AR12 3B/5P NGU-SRO-BG-XX-DR-A-02814 Rev P01

Apartment Layouts (BLOCK G) Type AR13 3B/4P NGU-SRO-BG-XX-DR-A-02815 Rev P01

Apartment Layouts (BLOCK G) Type AR14 3B/6P NGU-SRO-BG-XX-DR-A-02816 Rev P01

Apartment Layouts (BLOCK G) Type AR16 4B/6P NGU-SRO-BG-XX-DR-A-02817 Rev P01

Apartment Layouts (BLOCK H) Type SO1 1B/1P NGU-SRO-BH-XX-DR-A-02818 Rev P01

Apartment Layouts (BLOCK H) Type SO2 1B/2P NGU-SRO-BH-XX-DR-A-02819 Rev P01

Apartment Layouts (BLOCK H) Type SO3 1B/2P NGU-SRO-BH-XX-DR-A-02820 Rev P01

Apartment Layouts (BLOCK H) Type SO4 1B/2P NGU-SRO-BH-XX-DR-A-02821 Rev P01

Apartment Layouts (BLOCK H) Type SO7 2B/3P NGU-SRO-BH-XX-DR-A-02822 Rev P01

Apartment Layouts (BLOCK H) Type SO8 2B/3P NGU-SRO-BH-XX-DR-A-02823 Rev P01

Apartment Layouts (BLOCK H) Type SO9 1B/2P NGU-SRO-BH-XX-DR-A-02824 Rev P01

Apartment Layouts (BLOCK H) Type SO9W 1B/2P NGU-SRO-BH-XX-DR-A-02825 Rev P01

Apartment Layouts (BLOCK H) Type SO10 2B/3P NGU-SRO-BH-XX-DR-A-02826

Rev P01  
Apartment Layouts (BLOCK H) Type SO10W 2B/3P NGU-SRO-BH-XX-DR-A-02827  
Rev P01  
Apartment Layouts (BLOCK H) Type SO11 2B/3P NGU-SRO-BH-XX-DR-A-02828  
Rev P01  
Apartment Layouts (BLOCK H) Type SO11W 2B/3P NGU-SRO-BH-XX-DR-A-02829  
Rev P01  
Apartment Layouts (BLOCK H) Type P1 1B/1P NGU-SRO-BH-XX-DR-A-02830 Rev  
P01  
Apartment Layouts (BLOCK H) Type P2 1B/2P NGU-SRO-BH-XX-DR-A-02831 Rev  
P01  
Apartment Layouts (BLOCK H) Type P3 1B/2P NGU-SRO-BH-XX-DR-A-02832 Rev  
P01  
Apartment Layouts (BLOCK H) Type P4 1B/2P NGU-SRO-BH-XX-DR-A-02833 Rev  
P01  
Apartment Layouts (BLOCK H) Type P5 1B/2P NGU-SRO-BH-XX-DR-A-02834 Rev  
P01  
Apartment Layouts (BLOCK H) Type P6 2B/3P NGU-SRO-BH-XX-DR-A-02835 Rev  
P01  
Apartment Layouts (BLOCK H) Type P7 2B/3P NGU-SRO-BH-XX-DR-A-02836 Rev  
P01  
Apartment Layouts (BLOCK H) Type P8 1B/2P NGU-SRO-BH-XX-DR-A-02837 Rev  
P01  
Apartment Layouts (BLOCK H) Type P8W 1B/2P NGU-SRO-BH-XX-DR-A-02838 Rev  
P01  
Apartment Layouts (BLOCK H) Type P9 2B/3P NGU-SRO-BH-XX-DR-A-02839 Rev  
P01  
Apartment Layouts (BLOCK H) Type P10 2B/4P NGU-SRO-BH-XX-DR-A-02840 Rev  
P01  
Apartment Layouts (BLOCK H) Type P11 2B/3P NGU-SRO-BH-XX-DR-A-02841 Rev  
P01  
Apartment Layouts (BLOCK H) Type P11W 2B/3P NGU-SRO-BH-XX-DR-A-02842  
Rev P01  
Apartment Layouts (BLOCK J) Type P12 1B/1P NGU-SRO-BJ-XX-DR-A-02843 Rev  
P01  
Apartment Layouts (BLOCK J) Type P13 1B/2P NGU-SRO-BJ-XX-DR-A-02844 Rev  
P01  
Apartment Layouts (BLOCK J) Type P14 1B/2P NGU-SRO-BJ-XX-DR-A-02845 Rev  
P01  
Apartment Layouts (BLOCK J) Type P15 3B/5P NGU-SRO-BJ-XX-DR-A-02846 Rev  
P01  
Apartment Layouts (BLOCK J) Type P16 3B/4P NGU-SRO-BJ-XX-DR-A-02847 Rev  
P01  
Apartment Layouts (BLOCK J) Type P17 2B/4P NGU-SRO-BJ-XX-DR-A-02848 Rev  
P01  
Apartment Layouts (BLOCK J) Type P18 2B/4P NGU-SRO-BJ-XX-DR-A-02849 Rev  
P01

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

- 3 The relevant phase of the development as hereby permitted shall not commence until the Reserved Matters of the relevant phase of the proposed development have been submitted to and approved in writing by the Local Planning Authority. The reserved matters comprise the following:

- (a) Layout;



- (b) Scale;
- (c) Appearance;
- (d) Access;
- (e) Landscaping.

Reason: These details are required to ensure that a satisfactory development is achieved.

- 4 All applications for Reserved Matters pursuant to Condition 2 shall be made to the Local Planning Authority, before the expiration of 20 years from the date of this permission.

Reason: To comply with Section 92 of the Town and Country Planning Act 1990 and since a period of 20 years is considered to be a reasonable time limit in view of the extent and timescale of the proposal.

- 5 The development to which this permission relates shall begin not later than whichever is the later of the following dates: (a) expiration of six years from the date of this outline planning permission or (b) the expiration of two years from the date of approval for the final approval of reserved matters, or in the case of different dates, the final approval of the last such matter to be approved.

Reason: To comply with Section 92 of the Town and Country Planning Act 1990.

- 6 The outline development hereby permitted shall be carried out in accordance with the following approved drawing(s) and/or document(s) unless otherwise agreed in writing by the LPA:

Parameter plans:

Parameter Plan Detailed and Outline Components NGU-SRO-ZZ-00-DR-A-02110 Rev P01

Parameter Plan Ground Floor Level Heights (FFL) NGU-SRO-ZZ-00-DR-A-02111 Rev P01

Parameter Plan Ground Floor and Above Plot Extent NGU-SRO-ZZ-00-DR-A-02112 Rev P01

Parameter Plan Maximum Building Heights NGU-SRO-ZZ-XX-DR-A-02113 Rev P01

Parameter Plan Access NGU-SRO-ZZ-00-DR-A-02114 Rev P01

Parameter Plan Open Spaces NGU-SRO-ZZ-XX-DR-A-02115 Rev P01

Parameter Plan Basement Extent NGU-SRO-ZZ-B1-DR-A-02116 Rev P01

Parameter Plan Demolition NGU-SRO-ZZ-XX-DR-A-02117 Rev P01

Framework Design Code NGU-SRO-ZZ-XX-RP-A-02002 Rev P01

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

- 7 The development hereby approved shall not be commenced until a phasing plan showing the location of phases, the sequencing for those phases and indicative timescales for their delivery shall be submitted to and approved by the Local Planning Authority in writing. The development shall be carried out in accordance with the plan thereby approved. The phasing plan may be updated from time to time subject to the written approval of the Local Planning Authority.

Reason: To allow the Local Planning Authority to understand the relevant phase of development that is subject to condition discharge and/or reserved matters, and to ensure coordination between the phasing plan as approved and the triggers in any

relevant agreement made under Section 106 of the Town and Country Planning Act 1990 (as amended).

- 8 Prior to the commencement of works on a relevant part of the development hereby approved, a CIL chargeable developments plan, including projections for the commencement and completion of development, as it relates to that part of the development shall be submitted to the Local Planning Authority.

Reason: To define the extent of a CIL phase for the purposes of the CIL Regulations 2010 as amended.

- 9 Any plant shall be installed, together with any associated ancillary equipment, so as to minimise the transmission of noise. The rated noise level from all plant and ancillary equipment shall be equal to background noise level when measured at 1m from the window of the nearest noise sensitive receptor unless otherwise agreed in writing by the Local Planning Authority. Prior to the installation of plant, an assessment of the expected noise levels of any plant shall be submitted to and approved in writing by the Local Planning Authority. The assessment shall be carried out in material compliance with BS4142:2014 'Methods for rating and assessing industrial and commercial sound.' and shall include any mitigation measures necessary to achieve the above required noise levels. The plant shall thereafter be installed and maintained in accordance with the approved details.

Reason: To protect acceptable local noise levels in the interest of the amenities of sensitive uses, and in accordance with Policy 7.15 of the London Plan (2016)

- 10 A scheme of sound insulation measures to address potential noise transfer between Class E(g)(iii) and B8 uses and residential uses within the building shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of works on the superstructure of buildings that include both Class E(g)(iii) and/or B8 uses and residential uses. The approved measures shall thereafter be implemented in full.

Reason: To protect acceptable local noise levels in the interest of the amenities of sensitive uses, and in accordance with Policy 7.15 of the London Plan (2016)

- 11 Part A: Prior to the commencement of each phase of the development hereby approved, except for site preparation works, details of the sound attenuation to protect against externally generated (environmental) noise sources so as to achieve the internal ambient noise levels detailed in BS8233:2014 shall be submitted to and approved in writing by, the Local Planning Authority. The measured or calculated noise levels shall be determined in accordance to the latest British Standard 8233:2014 Guidance on sound insulation and noise reduction for buildings. These criteria apply with windows shut and with an appropriate ventilation system installed. Any mechanical ventilation system shall not give rise to a noise level greater than the above internal noise standards, or a noise rating of NR25 within bedrooms, and NR30 within living/dining rooms.

Part B: The approved works are to be completed prior to occupation of the residential development for that phase and retained for the lifetime of the development for that phase.

Part C: Prior to first occupation of any relevant phase, a Post Completion Report

demonstrating compliance with the mitigation measures in A above shall be submitted to and approved in writing by the Local Planning Authority for that phase.

Reason: In order to safeguard the amenities, health and safety of neighbouring properties and occupiers and of the area generally, and to ensure compliance with Policy 7.15 of the London Plan (2016).

- 12 The relevant phase of the development hereby approved shall not commence unless a site investigation is carried out and remediation strategy is prepared by an appropriate person in accordance with of BS 10175:2011 + A2:2017 and 'Model Procedures of for the Management of Land Contamination – Contaminated Lane Report 11' (CLR 11) (or other such updated British Standard) to determine the nature and extent of any contamination present. The investigation and strategy shall be carried out in accordance with a scheme, which shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of works for that relevant phase of the development, that includes the results of any research and analysis undertaken as well as details of remediation measures required to contain, treat or remove any contamination found.

If during works new areas of contamination are encountered, which have not previously been identified, then the additional contamination shall be fully assessed and an appropriate remediation scheme agreed with the Local Planning Authority unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure the safe development and secure occupancy of the site proposed for use in accordance with Policy 5.21 of the London Plan (2016)

- 13 Prior to first residential occupation of a relevant phase, or the commencement of the use within the relevant part of the development hereby approved, a verification report written by a suitably qualified person in accordance with of BS 10175:2011 + A2:2017 and 'Model Procedures of for the Management of Land Contamination – Contaminated Lane Report 11' (CLR 11) (or other such updated British Standard) must be submitted to and approved in writing by the Local Planning Authority stating that remediation has been carried out in accordance with the remediation scheme approved pursuant to condition 13 and the site is safe for end use.

Reason: To ensure the safe development and secure occupancy of the site proposed for use in accordance with Policy 5.21 of the London Plan (2016).

- 14 The development hereby permitted shall be in accordance with the private residential mix unless otherwise agreed in writing with the Local Planning Authority:

Site Wide Private Residential Mix

Size	No of Homes	%
Studio	139	9
1 bed	470	30
2 bed	525	34
3 bed (+)	429	27
Total	1563	100

Reason: To ensure that the Development is undertaken in accordance with the approved drawings and documents and the assessed Environmental Statement.

- 15 Prior to the commencement of works on the superstructure of a relevant phase hereby approved, a scheme for the landscape works and treatment of that part of the development shall be submitted to and approved in writing by the Local Planning Authority. The approved details shall be fully implemented prior to the earlier of first occupation or first use of the relevant phase of the development or in accordance with a programme agreed in writing with the Local Planning Authority. Such a scheme shall include:
- a) a planting plan (including species, plant sizes and planting densities);
  - b) details of root management systems for all trees;
  - c) proposed walls and fences, indicating siting, materials and heights;
  - d) any proposed contours and ground levels;
  - e) areas of hard landscape works and external furniture, and proposed materials;
  - f) the detailing and provision of green/brown roof(s);
  - g) Details of the proposed arrangements for the maintenance of the landscape works; and,
  - h) Details of the proposed lighting design and arrangements for these areas.

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

Reason: To ensure a satisfactory appearance and setting for the proposed development, to ensure that it enhances the visual amenity of the area and to ensure a satisfactory environment for future residents, occupiers and other users

- 16 Prior to the commencement of works for each phase excluding site preparation works, details of the design, implementation, maintenance and management of the sustainable drainage scheme for each phase shall be submitted to, and approved in writing by, the Local Planning Authority. Those details shall include:
- i) Information about the design storm period and intensity, discharge rates and volumes (both pre and post development), temporary storage facilities, means of access for maintenance, the methods employed to delay and control the surface water discharged from the site and the measures taken to prevent flooding and pollution of the receiving groundwater and/or surface waters;
  - ii) Any works required off-site to ensure adequate discharge of surface water without causing flooding or pollution (which should include refurbishment of existing culverts and headwalls or removal of unused culverts where relevant);
  - iii) Flood water exceedance routes, both on and off site;
  - iv) A timetable for its implementation, and
  - v) A management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by an appropriate public body or statutory undertaker, management and maintenance by a Residents' Management Company or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime.

Once approved, the scheme shall be implemented, retained, managed and maintained in accordance with the approved details.

Reason: To prevent the increased risk of flooding, to improve and protect water quality, improve habitat and amenity, and ensure future maintenance of the surface water drainage system in accordance with Policy 5.13 of the London Plan.

- 17 A minimum of 10% of all residential units hereby approved shall be provided as wheelchair easily adaptable accommodation (Part M4(3)(2)(a)) for residents who are

wheelchair users unless otherwise agreed in writing by the Local Planning Authority, with the remaining 90% of units achieving Building Regulations requirement M4(2) -'accessible and adaptable dwellings'. Reserved matters applications that include such accommodation shall demonstrate that these minimum targets will be achieved.

Reason: To ensure that the development is suitably accessible.

- 18 Applications for the approval of Reserved Matters relating to phases that include residential floorspace (Use Class C3) shall demonstrate how the design standards set out in Policy D6 of the ITP London Plan are met for the residential development, unless otherwise agreed with the Local Planning Authority, to ensure that a good standard of residential accommodation is provided.

Reason: To ensure a satisfactory standard of residential accommodation.

- 19 Prior to the commencement of works to the superstructure on the relevant phase of the development as hereby permitted, excluding site preparation works, details of the following as they relate to that part of the development shall be submitted to and approved in writing by the Local Planning Authority, either within the Reserved Matters applications (if specifically referenced within that submission) or under separate cover unless otherwise agreed in writing with the Local Planning Authority.

- a) Details of materials for all external surfaces, including samples which shall be made available for viewing on site or in another location as agreed;
- b) Details of any plant, including locations, external appearance and any proposed screening;
- c) Details of any CCTV; and,

The approved details shall be implemented in full prior to first occupation or use of the relevant part of the development.

Reason: To ensure a satisfactory development, in the interest of residential amenity, design quality and visual appearance, highway flow and safety and sustainable development.

- 20 Prior to commencement of works to the superstructure within a relevant phase of the development as hereby permitted excluding site preparation works, details of the following as they relate to that part of the development shall be submitted to and approved in writing by the Local Planning Authority, either within the Reserved Matters applications (if specifically referenced within that submission) or under separate cover unless otherwise agreed in writing with the Local Planning Authority.

- a) Highway, footpath and cycle way layout, within the relevant phase of the development including connections and traffic management measures, sub-surface details, surfacing materials and street furniture;
- b) Details of cycle storage, including the number of spaces (which shall accord with London Plan 2016 standards), structures, layout, equipment, access, security and weather proofing appropriate to the type of cycle storage;
- c) Details of any motorcycle and car parking provision, including layouts, cumulative (site-wide) parking provision to include disabled parking provision comprising 3% of allocation for residential parking spaces and 10% allocation for commercial premises comprising of both designated bays, and enlarged bays (in line with Table 10.6 of the Draft London Plan dated December 2017) ;
- d) Details of electric vehicle charging points, which shall comprise a minimum of:

- i. 20% of car parking spaces with active and 20% with passive charging points for residential development;
- ii. 20% active and 10% passive for office development;
- iii. 10% active and 10% passive for retail parking spaces; and
- iv. 10% active and 10% passive for leisure.

Reason: To ensure compliance with policy DMP12.

- 21 Part A: Prior to the commencement of works to the superstructure within a relevant phase of the development as hereby permitted, excluding site preparation works and Phase 3, an updated air quality assessment and air quality neutral assessment shall be submitted and approved by the Local Planning Authority in line with national best practice guidance and other guidance provided by/or published by the Local Planning Authority and the Greater London Authority (GLA) for that phase unless otherwise agreed in writing with the Local Planning Authority.

Part B: All mitigation measures as identified within the approved air quality assessment and air quality neutral assessment that are to be installed during the course of the development for the relevant phase shall be carried out in full in relation to the relevant part of the development.

Part C: All measures identified within the approved air quality assessment and air quality neutral assessment that will be implemented or continue to be implemented after the completion of the relevant development will be completed within agreed timescales. A report demonstrating that all such measures have been installed will be provided to the satisfaction of and approved in writing by the Local Planning Authority upon completion of the development.

Reason: To protect local air quality, in accordance with Policy 7.14 of the London Plan (2016), and protect air quality and people's health by ensuring that the production of air pollutants, such as nitrogen dioxide and particulate matter, are kept to a minimum during the lifetime of the development. To contribute towards the maintenance or to prevent further exceedances of National Air Quality Objectives.

- 22 Details of the extract ventilation system and odour control equipment for any commercial kitchens, including all details of external ducting, shall be submitted to and approved in writing by the Local Planning Authority prior to the installation of any such equipment. The approved equipment shall be installed prior to the commencement of the relevant use and shall thereafter be operated at all times during the operating hours of the relevant use and maintained in accordance with the manufacturer's instructions.

Reason: To protect the amenity of existing and future residential occupiers.

- 23 Development for each phase, excluding site preparation works, and Phase 3, shall not commence until a drainage strategy for each phase detailing any on and/or off site drainage works, has been submitted in writing to and approved in writing by the Local Planning Authority in consultation with the sewerage undertaker unless otherwise agreed in writing with the Local Planning Authority. No discharge of foul or surface water from the relevant phase shall be accepted into the public system or River Brent until the drainage works referred to in the strategy have been completed.

Reason - The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid

adverse environmental impact upon the community.

- 24 Prior to the commencement of development in each relevant phase, excluding site preparation works, and Phase 3, impact studies of the existing water supply infrastructure shall be submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water for that phase unless otherwise agreed in writing with the Local Planning Authority. The studies shall determine the magnitude of any new additional capacity required in the system, a suitable connection point, and any mitigation where necessary. Any necessary mitigation measures identified by the impact studies shall be submitted to and approved in writing by the Local Planning Authority and carried out in full in accordance with the approved details prior to first occupation of each relevant phase.

Reason: To ensure that the water supply infrastructure has sufficient capacity to cope with the additional demand in accordance with London Plan (2016) policies 5.14 'Water Quality and Wastewater Infrastructure' and 5.15 'Water Use and Supplies'.

- 25 Prior to the commencement of a relevant phase of development, a Construction Method Statement (CMS) shall be submitted to and agreed by the Local Planning Authority for that phase which will outline the different activities and procedures to be undertaken in order to complete the various construction works within the relevant phase unless otherwise agreed in writing by the Local Planning Authority. The CMS shall include the following items:
- The detailed construction programme for works, highlighting the various stages and their context within the project, including a full schedule of plant, vehicles and equipment schedules;
  - Site layout arrangements (including requirements for temporary works), plans for storage, accommodation, vehicular parking areas, wheel washing facilities, delivery and site access and egress;
  - Details of operations that are likely to result in disturbance, in particular dust and noise, with an indication of the expected duration of operations with key dates, including a procedure for prior notification of the Local Planning Authority and relevant statutory and non-statutory parties so that local arrangements can be agreed; and,
  - Consultation on the enabling works, demolition and construction methods and plant type to be used for work near to the Thames Water sewer networks.

Reason: The CMS will be used to inform the phase specific Construction Environmental Management Plan and ensure that mitigation measures outline within the January 2018 ES are sufficient for the specific works to be undertaken by the contractor within each phase of the development.

- 26 No phase of the development hereby approved shall commence until a phase specific Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority for the relevant phase. The CEMP shall provide details of how interim and construction works, based on the CMS for that phase, are to be undertaken and will include the following unless otherwise agreed in writing by the Local Planning Authority:
- a) Details of the controls with regard to general site layout and operations, working hours, site lighting, security, community engagement arrangements, emergency planning and response, fire prevention and control, utility works, and worker access and welfare; and,
  - b) Specific management measures and mitigation on matters such as noise and

air quality management (including Air Quality Dust Management Plan), pollution incident response, lighting management, traffic management, water management, ecology, trees and landscape management and heritage management, as required.

The development shall be carried out in accordance with the approved details and mitigation measures. Additionally the site Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out on the site. All sub-contractors shall be required to demonstrate adherence to policies and procedures set out within the CEMP.

Reason: To safeguard the amenity of the neighbours by minimising impacts of the development that would otherwise give rise to nuisance and in the interest of highway and pedestrian flow and safety.

- 27 Details of a scheme setting out the collection and storage of waste and recycled materials for a relevant building shall be submitted in writing to and for approval by the Local Planning Authority prior to the commencement of any superstructure works excluding site preparation works, for that building, unless otherwise agreed in writing by the Local Planning Authority.

The scheme shall address:

- 1) Waste and recycling collection frequency, following liaison with Brent's Waste Management Team
- 2) The collection storage areas
- 3) Temporary waste facilities

The details shall be implemented as approved prior to the occupation of the development for residential purposes, and maintained thereafter.

Reason: to protect the amenity of the locality.

- 28 Prior to the commencement of works within a relevant phase of development, a Construction Logistics Plan (CLP), which has been based on the Framework Construction Method Statement and Logistics Plan, shall be submitted to and approved in writing by the Local Planning Authority for that phase. The approved CLP shall be implemented for the duration of interim works and construction of that phase unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interest of highway and pedestrian flow and safety.

- 29 No piling for a relevant phase of development shall take place until a Piling Method Statement (which details the proposed programme, depth and type of piling works; construction methodology and measures to prevent/minimise the potential for damage to subsurface sewerage infrastructure, and the Grand Union Canal where appropriate) has been submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water (and the Canal and Rivers Trust where appropriate) for that phase unless otherwise agreed in writing by the Local Planning Authority. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services



on 0800 009 3921 to discuss the details of the piling method statement.

- 30 Prior to the commencement of works within a relevant phase of development, excluding site preparation works and Phase 1, an Ecological Mitigation and Enhancement Plan (EMEP) shall be submitted to and approved in writing by the Local Planning Authority for that phase. The EMEP shall be implemented and complied with, unless otherwise approved in writing by the Local Planning Authority.

Reason: In order to ensure that the authorised development makes a positive contribution to biodiversity in accordance with Policies 7.18 and 7.19 of the London Plan (2016).

- 31 A management plan, detailing the maintenance and cleaning regime for the public and communal external spaces within each relevant phase of development, shall be submitted to and approved in writing by the Local Planning Authority in writing prior to first use of the public or communal spaces within that phase of development. The approved plan shall be updated where required and implemented for the life of this development unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure a good quality of environment is provided.

- 32 Applications for the approval of Reserved Matters for a relevant phase of the development that include residential floorspace (within Use Class C3) shall be accompanied by details of the provision of play and recreational space and any associated equipment within the communal parts the relevant part of the development and shall adhere to the Mayor's 'Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance' (2012) unless otherwise agreed in writing with the Local Planning Authority. The approved play and recreational space and any associated equipment situated within the relevant part of the development site shall be implemented prior to first occupation of the relevant part of the development. The playspace shall thereafter be retained and maintained in accordance with the manufacturers specifications.

The details submitted to the Local Planning Authority must also include an update detailing the overall provision of play space and recreational facilities across the application site.

Reason: To ensure that a good quality of accommodation is provided for future residents.

- 33 Prior to first occupation of a relevant phase of development, a Delivery and Servicing Plan (DSP) based on the framework DSP shall be submitted to and approved in writing by the Local Planning Authority for that phase and the approved DSP shall be implemented for the life of the development unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interest of highway and pedestrian flow and safety.

- 34 Details of the wind mitigation measures, including any screening or other measures around balconies or communal amenity areas and how the design of blocks respond to micro-climate issues shall be submitted to and approved in writing by the Local Planning Authority with the submission of each reserved matters application unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure the outdoor amenity areas hereby approved are usable.

- 35 Prior to commencement of development of the relevant phase/building (as applicable) (except for demolition and site clearance) hereby approved, a BREEAM pre-assessment relating to all non-residential floor space within the development, which targets a rating of 'excellent', or an alternative rating to be agreed in writing by the Local Planning Authority, shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the Development is designed and constructed to improve environmental performance and adapt to the effects of climate change over time.

- 36 Within the first 6 months of occupation of the commercial floorspace within each building (as applicable), a Post Construction Stage Review BRE Certificate shall be submitted to and approved in writing by the Local Planning Authority. The certificate shall demonstrate that the commercial floor space within the development has achieved BREEAM "Excellent" unless otherwise agreed in writing by the Local Planning Authority. The Development shall be maintained so that it continues to comply for the lifetime of the Development.

Reason: To ensure the Development is designed and constructed to improve environmental performance and adapt to the effects of climate change over time.

- 37 All relevant Phases/Buildings (as applicable) shall comply with Brent's Waste Planning Guidance (or any such document which may replace this guidance) unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure adequate storage for household and commercial waste is available to occupiers of the development.

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

Reason: To ensure that an adequate standard of accommodation is maintained in all of the residential units.

- 39 No development shall take place until a detailed scheme for the proposed works to the banks of the River Brent is submitted and agreed in writing by the local planning authority. Thereafter the development shall be carried out in accordance with the approved scheme and any subsequent amendments shall be agreed in writing with the local planning authority.

The scheme shall include:

- Channel cross sections and details of any re-profiling works to the river bank;
- Plans showing the extent and layout of the buffer zone;
- Details of any proposed footpaths, fencing, lighting etc.;
- Construction methods;
- Measures to be used in order to minimise environmental impact of the works (considering both potential disturbance and pollution);
- Any necessary pollution protection methods;

- Timing of the works.

Reason: To ensure the protection of wildlife and supporting habitat and secure opportunities for enhancing the site's nature conservation value in line with NPPF paragraphs 170 and 175 and the London Borough of Brent Development Management Policy 9b. To manage and reduce the risks of flooding in line with paragraph 163 of the NPPF and Brent Development Management Policy 9a.

- 40 The development hereby approved shall contain no more 686 sqm of commercial floor space which shall not be used other than for purposes within the following Use Classes:

Class E(a) - Shops

Class E(b) - Restaurants

Class E(c) - Financial, professional or other services which can be carried out in a commercial, business or service locality

Class E(d) - Indoor sport, recreation or fitness centres

Class E(e) - Medical or health services

Class E(f) - Creches, day nurseries and day centres

Class F1 - Learning and non-residential institutions, with the exception of places of worship

Sui Generis - restricted to Public Houses, Drinking establishments with food provision

as detailed in the drawings hereby approved, unless other agreed in writing by the Local Planning Authority, notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 (as amended) (or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification) and the Town and Country Planning (General Permitted Development) Order 2015 (as amended) (or any order revoking and re-enacting that Order with or without modification).

Reason: To ensure the proposed commercial uses within this part of the development are compatible with the predominant residential uses on upper floors of the building, and provide a degree of active frontage to this part of the development.

## INFORMATIVES

- 1 In dealing with this application, the London Borough of Brent has implemented the requirements of the National Planning Policy Framework and of the Town and Country Planning (Development Management Procedure) (England) Order 2015 to foster the delivery of sustainable development in a positive and proactive manner.
- 2 The Community Infrastructure Levy will be collected by Brent after/should the scheme is/be implemented and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation in line with the construction costs index.
- 3 The applicant is advised that under the Control of Pollution Act 1974, construction work which will be audible at the site boundary will be restricted to the following hours:
  - 8.00am - 6.00pm Monday to Friday
  - 8.00am - 1.00pm Saturday
  - and not at all on Sundays and Bank Holidays.
- 4 The applicant's attention is drawn to the Party Wall Act 1996 which sets out

requirements for notice to be given to relevant adjoining owners of intended works on a shared wall, on a boundary or if excavations are to be carried out near a neighbouring building.

- 5 A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing [wwqriskmanagement@thameswater.co.uk](mailto:wwqriskmanagement@thameswater.co.uk). Application forms should be completed online via [www.thameswater.co.uk/wastewaterquality](http://www.thameswater.co.uk/wastewaterquality).  
Attenuation of Storm Flows. Combined Sewer drain to nearest manhole.
- 6 In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. The contact number is 0800 009 3921.
- 7 There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted for extensions to existing buildings. The applicant is advised to visit [thameswater.co.uk/buildover](http://thameswater.co.uk/buildover). Water Main Crossing Diversion (Thames Water)
- 8 There is a Thames Water main crossing the development site which may/will need to be diverted at the Developer's cost, or necessitate amendments to the proposed development design so that the aforementioned main can be retained. Unrestricted access must be available at all times for maintenance and repair. Please contact Thames Water Developer Services, Contact Centre on Telephone No: 0800 009 3921 for further information.
- 9 Thames Water will aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
- 10 Commercial Business must ensure all waste produced on site are disposed of responsibly under their duty of care within Environmental Protection Act 1990. It is for the business to arrange a properly documented process for waste collection from a licensed contractor of their choice. Documentation must be kept by the business and be produced on request of an authorised Local Planning Authority Official under section 34 of the Act. Failure to do so may result in a fixed penalty fine or prosecution through the criminal Court system.
- 11 The applicant is advised that prior to demolition of existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in

accordance with the correct procedure prior to any demolition or construction works carried out.

- 12 The new development will require naming. The applicant should contact LBB Local Land Charges at least six weeks before the relevant development phase is occupied on 020 8489 5573 to arrange for the allocation of a suitable address.
- 13 The Environment Agency has provided advice to the applicant in respect of Ground Water Protection and Land Affected by Contamination. This advice is available on the Local Planning Authority's website using the application reference number.
- 14 The following highways licences may be required: crane licence, hoarding licence, on-street parking suspensions. The applicant must check and follow the processes and apply to the HA.
- 15 This is a phased development for the purposes of the CIL Regulations (2010 as amended). The extent of the CIL phase will be defined on a relevant CIL phasing plan.
- 16 Site Preparation Works: these comprise site preparation and temporary works including but not limited to the demolition of existing buildings and structures; surveys; site clearance; archaeological works; ground investigation; remediation; the erection of fencing or hoardings; the provision of security measures and lighting; the erection of temporary buildings or structures associated with the development; the laying, removal or diversion of services; construction of temporary access; temporary highway works; and temporary internal site roads.
- 17 The management and maintenance plan for the sustainable drainage scheme for the lifetime of the development will be a live document that will be updated as and when each phase of the development comes forward for development.
- 18 The necessary environmental permits and consents for works to the River Brent and Grand Union Canal are to be obtained, as required, from the Environmental Agency and the Canal and River & Trust and submitted to Local Planning Authority.
- 19 It is likely that during the course of ground works that you will encounter invasive species of flora such as Japanese Knotweed, Giant Hogweed and Himalayan Balsam. Correct disposal of invasive non-native species biological material is vital in order to avoid the risk of spreading the species beyond the site/location. If in doubt, always contact the relevant agency for advice on disposal as there statutory regulations which must be adhered to which cover the composting, burning and burials of plant materials on-site and the transfer and disposal of material including ash to licensed or permitted landfill sites. Large volumes of waste requiring burial on site may require a licence under the Pollution Prevention and Control Regulations 2002.
- 20 Wycombe Road shall be stopped up as public highway under S247 of the Town & Country Planning Act 1990 prior to any building works commencing on the area of land currently occupied by the road.

21 **Definitions**

Substructure:

Substructure works are defined as building foundations or underlying building supporting substructure

**Superstructure:**

Superstructure works are defined as part of the building above its foundations

**Phase:**

A phase of development comprises a phase defined for the purposes of CIL and/or a phase defined for the purposes of an application for reserved matters and/or a phase defined for the purposes of the discharge of planning conditions and/or a construction phase or sub-phase, and for the purposes of discharging relevant planning obligations. A phase can comprise site preparation works, demolition works, sub-structures, and/or buildings, plots or groups of plots.

**Interim Works:**

Interim works comprise temporary works and uses associated with the development necessary to complete the development which may arise during the construction period.

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