

COMMITTEE REPORT

Planning Committee on
Item No
Case Number

11 September, 2024
05
23/0176

SITE INFORMATION

RECEIVED	18 January, 2023
WARD	Alperton
PLANNING AREA	Brent Connects Wembley
LOCATION	All Units at Dowlings Parade, HNS Autos and Delta Hand Car Wash, Bridgewater Road, Wembley, HA0 1AJ
PROPOSAL	Partial demolition of the HNS Autos building and other associated buildings on site and erection of new building comprising residential units and commercial space at ground floor level, cycle parking spaces, blue badge parking, amenity space and landscaping.
PLAN NO'S	See condition 2.
LINK TO DOCUMENTS ASSOCIATED WITH THIS PLANNING APPLICATION	<p><u>When viewing this on an Electronic Device</u></p> <p>Please click on the link below to view ALL document associated to case https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=DCAPR_163366</p> <p><u>When viewing this as a Hard Copy</u> .</p> <p>Please use the following steps</p> <ol style="list-style-type: none">1. Please go to pa.brent.gov.uk2. Select Planning and conduct a search tying "23/0176" (i.e. Case Reference) into the search Box3. Click on "View Documents" tab

RECOMMENDATIONS

That the Committee resolve to GRANT planning permission subject to completion of a legal agreement to secure the following planning obligations:

1. Payment of the Council's legal and other professional costs in (a) preparing and completing the agreement and (b) monitoring and enforcing its performance.
2. Notification of material start 28 days prior to commencement.
3. Off-site Affordable Housing Financial Contribution (£185,470) to be utilised to fund additional affordable housing within the Borough together with an early and late stage review
4. Affordable Workspace Provision contribution (£150,000)
5. Detailed design stage energy assessment:
 - (a) Initial carbon offset payment to be paid prior to material start if zero-carbon target not achieved on site.
 - (b) Post-construction energy assessment. Final carbon offset payment upon completion of development if zero-carbon target not achieved on site.
 - (c) 'Be seen' energy performance monitoring and reporting
6. Controlled Parking Zone – Financial contribution of £16,000 towards implementation of Controlled Parking Zone in the vicinity.
7. A parking permit restriction to remove the right of residents to on-street parking permits in any future Controlled Parking Zone that is implemented in the area.
8. Highway Works under a S38/S278 Agreement to:
 - (i) widen the footway along the eastern side of Bridgehill Close fronting the site to 2m
 - (ii) remove the existing crossovers to Bridgewater Road and reinstate them to footway and verge.
 - (iii) repave the footway fronting Bridgewater Road, together with associated amendments to lining, signing, lighting and drainage and any other accommodation works.
9. Car Club - Provision of three years free membership of a local Car Club for all incoming residents.
10. Financial Contribution of £7,000 towards off-site planting of two street trees and their maintenance within the vicinity of the site
11. Submission of a detailed 'Television and Radio Reception Impact Assessment' and underwriting of all mitigation required in addressing any interference.
12. Indexation of contributions in line with inflation (to be indexed from date of Planning Committee resolution)
13. Any other planning obligation(s) considered necessary by the Head of Planning.

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

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

Compliance

1. Three-year rule
2. Approved drawings and documents

3. Non-residential floorspace to be E(g)(ii) or (iii) only
4. Number of residential units
5. Water Consumption
6. Ecological Assessment
7. Non-Road Mobile Machinery
8. Building Regulations M4(2) 'accessible and adaptable
9. Electric Vehicle Charging Points
10. Flood Risk Assessment
11. Aerials
12. Implementation of Noise Mitigation measures

Pre-commencement

13. Construction Method Statement
14. Construction Logistics Plan
15. Liaison with London Underground
16. Tree Protection Plan and Arboricultural Assessment

Post-commencement

17. Piling Method Statement
18. Site Investigation
19. Materials
20. Overheating
21. Surfaces
22. Landscaping Details

Pre-occupation or use

23. Lighting
24. Noise Plant Details
25. Delivery and Servicing Plan
26. Vibration

Informatives

1. CIL Liability
2. Liaison with London Underground
3. Party Wall Act
4. Asbestos removal
5. Quality of imported soil


6. London Living Wage
7. Fire Safety standards
8. Notify Highways of work starting

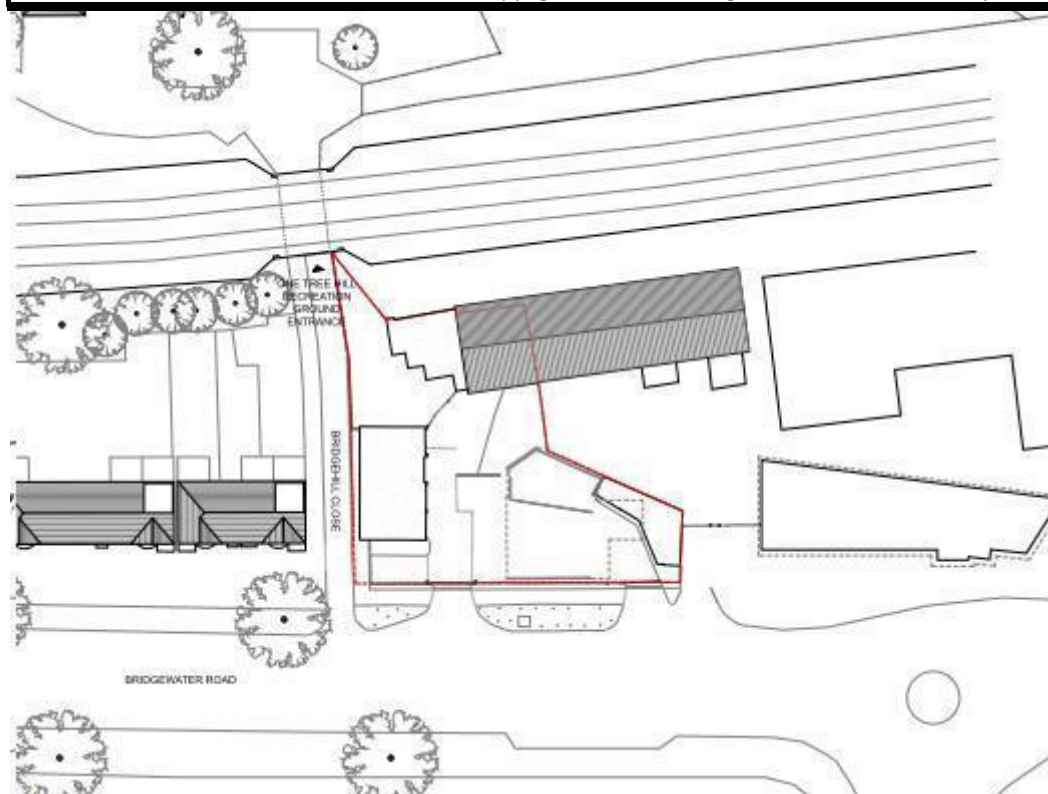
That the Head of Planning is delegated authority to make changes to the wording of the committee's decision (such as to delete, vary or add conditions, informatives, planning obligations or reasons for the decision) prior to the decision being actioned, provided that the Head of Planning is satisfied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

That, if by the "expiry date" of this application (subject to any amendments/extensions to the expiry date agreed by both parties) the legal agreement has not been completed, the Head of Planning is delegated authority to refuse planning permission.

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

SITE MAP

	Planning Committee Map Site address: All Units at Dowlings Parade, HNS Autos and Delta Hand Car Wash, Bridgewater Road, Wembley, HA0 1AJ © Crown copyright and database rights 2011 Ordnance Survey 100025260
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This map is indicative only.

PROPOSAL IN DETAIL

The proposal is to demolish the existing buildings on site and erect a building of eight storeys in its place. On the ground floor of the building there would be a 720sqm area of light industrial workspace (Use Class E(g)) and a single ancillary disabled parking space. Ancillary floorspace such as cycle stores and plant area would be located at the ground floor level, with refuse stores also on the ground floor and accessed via Bridgehill Close.

Above this there would be 32 new homes and communal amenity space on the 1st, 4th and roof level.

There is an extant consent relating to this site which will expire in April 2025 for a similar scale of development. That development was one storey lower (maximum of 7 storeys) and contained 28 homes. Changes have also been made to address fire safety issues.

Key Information

Site Designations

Relevant site designations:
Alperton Growth Area
Tall Building Zone
Air Quality Management Area
Air Quality Focus Area

Land Use Details

Site area (ha):	0.1ha
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Non-residential details:			
	Use Description	Use Class	Floorspace (m ²) (Gross Internal Area)
Existing	Car Wash and Auto Repairs Garage (former use)	Sui Generis	575 m ²
Proposed	Residential	C3	1,998m ²
	Workspace	Class E(g(ii & iii))	720m ²
Total Proposed			2,718 m²

Parking

	Car Parking Spaces (General)	Car Parking Spaces (Disabled)	% EVCP	Bicycle Spaces	
				Short stay	Long stay
Existing	N/A	NA	N/A	N/A	N/A
Proposed	0	1	1		73

Environmental performance

	Policy target	Proposed
Energy		
Percentage of on-site carbon savings beyond Part L of Building Regulations (2021)	The proposed regulated development with 'Be Lean', 'Be Clean' and 'Be Green' measures incorporated within the residential part of the development is confirmed an improvement in build fabric at over 20.35% at the "Be Lean" stage and an overall improvement (BER/TER) in regulated emissions at over 71.88% above Part L 2021 standard, through the adoption of very high standards of insulation, heat pump driven heating and hot water systems and a roof mounted PV array. The scheme would require an estimated carbon off-set payment of £24,624.00 to meet with London Plan "Zero Carbon" requirements.	
Percentage of on-site carbon savings achieved through energy efficiency measures		
Off-site reduction (%) and/or carbon offset contribution		
Unregulated carbon emissions		
Sustainability		
BREEAM score	Excellent if over 1000sqm of commercial floorspace	Not required as less than 1000sqm
Urban Greening Factor (UGF)	0.4	0.4
Biodiversity Net Gain (BNG)	Positive	Figures not provided but likely to be an improvement given the hardstanding and buildings on site at present

EXISTING

The application site is located on the north-eastern side of Bridgewater Road, and to the southeast of the junction with Bridgehill Close. It contains three buildings – the rear proportion of the site contains a warehouse building previously used to facilitate car repairs (known as HNS Autos), the southern section of the site fronting Bridgewater Road contains a car wash and the northern eastern end along Bridgehill Close contains commercial use at ground floor and a residential flat on the upper floor.

The Piccadilly Underground line tracks run directly north of the site and to the south-east are industrial buildings.

The wider surrounding area is mixed in character, comprising traditional residential areas to the west, the Recreation Ground and Alperton School to the north, Alperton Bus Garage to the southeast and commercial and industrial buildings to the south, with large-scale redevelopment occurring in Alperton Growth Area further to the southeast. The site is not within a Conservations Area nor are any of the buildings occupying the site listed buildings.

The site lies within a designated Locally Significant Industrial Site (LSIS) and Tall Building Zone and is designated for "intensification and some co-location" potentially allowing both industrial capacity and new homes. The site falls at the end of an intensification corridor. The proposal is situated to the north of Alperton Growth Area within the Local Plan, which covers the area along the northern side of Bridgewater Road between the footpath over the railway line to One Tree Hill Recreation Ground and the Bus Depot on the junction with Ealing Road. Within the Local Plan, the application site also forms part of a wider site allocation.

AMENDMENTS SINCE SUBMISSION

The proposal has been revised since submission to introduce further fire safety mitigations in accordance with HSE advice.

SUMMARY OF KEY ISSUES

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

Principle of Development: The proposal is for a residential-led mixed use development that responds well to the policy context which seeks to encourage co-location of residential and industrial uses on appropriate sites. The site is situated within a Locally Significant Industrial Site (LSIS) and as such the 720sqm of proposed workspace (Use Class E(g) floorspace provided would meet London Plan and local policies

requirements. The proposal would also contribute towards the borough's housing targets within this Growth Area.

Consultation: Throughout the course of the application, one objection was received. The objector raised concerns with regard to the possible overdevelopment of the site, the buildings overall height and the buildings resultant impact upon the surrounding area. These matters are addressed within the report.

Affordable Housing: The scheme as proposed would not deliver any on-site affordable housing and it has been demonstrated through the consideration of a financial viability appraisal by consultants acting on behalf of the Council that the scheme could not viably deliver any affordable housing on site. An off-site contribution would be secured to the value of £185,470. This has been demonstrated to be the maximum viable contribution. The scheme is therefore compliant with policy. In addition, an upwards only late-stage review mechanism would be secured within a Section 106 Agreement to capture any off site contributions towards affordable housing in the event that viability improves together with an early stage review should works not meaningfully start within two years of permission being granted. The proposal is therefore considered to comply with policies H4, H5 and H6 of London Plan 2021 and policy BH5 of Brent's Local Plan 2019-2041.

Housing Mix: In line with Policy BH6 of the London Plan the proposal should seek to achieve 1 in 4 of the homes as family sized home (three bedrooms or more). The scheme does not quite achieve this requirement, providing 7 three bedroom family units equating to 21%. While this is noted to be a shortfall of 1 home, the development provides a positive contribution towards housing in the Borough and given the viability constraints, it is recommended that this minor shortfall can be accepted on balance and in this instance. The proposal includes 3 M4(3) wheelchair accessible / easily adaptable homes, which falls marginally short of the 10 % target (with a minimum of 3.2 homes required to achieve this target). All other homes will be constructed to M4(2) accessibility levels. This minor shortfall is considered to be acceptable on balance. These matters are discussed further in the housing mix section of the report.

Industrial floorspace: The proposal would include 720 sqm of light industrial floorspace which would be the same as the extant consent. While this would exceed the existing floorspace levels, it would fall marginally (36 sqm) short of the 0.65 ratio. This provision is considered to be acceptable on balance given the constrained nature of the site. A contribution of £150,000 would be secured towards the off-site provision of Affordable workspace.

Design and Appearance: Proposed development would comprise of a new eight storey building with upper floor amenity space areas. The proposed development would comprise of commercial floorspace at ground floor, with 32 residential units above. The ground floor would include large panel glazing for the proposed commercial space on the ground floor. The proposed development would be predominantly finished in brick, with flat roofs. The proposed development would be of a similar overall design and vernacular to other similar examples recently approved in Brent and would largely mimic the previously consented scheme on this site (which will expire in April 2025) but had a maximum height that is one storey lower. An appeal was also submitted against an earlier application, with the appeal dismissed by the Planning Inspectorate as it was concluded that the level of industrial floorspace was not sufficient and would have failed to deliver an adequate level of employment land. There were also concerns raised with regard to the height and the step up from the two-storey properties. However, since this dismissed appeal, the above consented scheme remains a material consideration and Brent has adopted its new Local Plan. This is discussed in more detail within the design section of this report.

Overall, the design is considered to be of a high quality and the overall height and massing are considered appropriate when factoring the high-density developments in the wider area and the traditional residential properties northwest of the application site, along with the benefits associated with an increase in residential unit numbers when considering the housing crisis and the need to deliver new homes. This is discussed further in the design section of this report.

Relationship with Neighbouring Properties: As discussed later within this report, the proposal would allow for adequate separation distance with regards to the existing residential properties north-west of the application site. Furthermore, the proposal would allow an appropriate separation distance from all other adjoining sites. Impacts on daylight and sunlight to neighbouring properties, and overshadowing to neighbouring external amenity spaces, have been assessed and are considered to be acceptable given the site's location within the Alperton Growth Area and provides a transition between the possible future taller buildings on Ealing Road junction and the lower scale suburban housing on Bridgewater Road. The impact on

daylight, sunlight, outlook, sense of enclosure and privacy are all discussed further in the body of this report.

Sustainability and Energy: The Energy Strategy demonstrates that carbon emissions for the residential use would be an improvement in build fabric at over 20.35% at the “Be Lean” stage and an overall improvement (BER/TER) in regulated emissions at over 71.88% above Part L 2021 standard, through the adoption of very high standards of insulation, heat pump driven heating and hot water systems and a roof mounted PV array.

Environmental Health Considerations: The proposal has been assessed in terms of air quality, noise and vibration, and contaminated land, and Environmental Health officers have requested conditions to ensure these issues are dealt with satisfactorily. A construction method statement would also be required by condition.

Flood Risk and Drainage: The site is located in a Flood Zone 1 area and therefore has a low-level risk of flooding. The proposal development would greatly reduce the surface water run off leaving the site and as such would reduce flood risk on site and elsewhere. This is discussed further in the body of this report.

Trees, Landscaping and Biodiversity: All trees on or adjoining the site are considered to be of low arboricultural value and the ecological value of the site and its surroundings is low. Tree protection measures have been proposed, together with ecological enhancements provided as part of the landscaping scheme. There is a wildlife corridor situated at the rear along the railway lines, however, the proposal through the replacement of the predominantly hardstanding site will improve and further enhance green spaces and biodiversity within the site, supporting the wildlife corridor.

Transport Considerations: The level of car parking (one disabled parking space) is considered sufficient given the high level of public transport accessibility. A financial contribution of £16,000 would be provided towards the implementation of a Controlled Parking Zone and the scheme would be “car free”. Servicing and refuse arrangements are acceptable. A final Delivery and Service Plan has been requested via condition. Satisfactory levels of cycle parking are proposed to London Plan standards.

RELEVANT SITE HISTORY

Application 19/3819 for a seven-storey building, accommodating 32 residential units was refused in 2020. Further to this an appeal was made and was dismissed by the Planning Inspectorate.

Application Ref: 20/1151 was submitted and approved for a seven-storey building facilitating 28 new residential dwellings and 720sqm of industrial workspace. The modifications made to this scheme overcame the previous refused application and appeal decision outcome linked to application 19/3819.

CONSULTATIONS

58 properties were consulted on 23rd January 2023, a site notice was erected on 27th January 2023 and a press notice was run on 2nd February 2023.

One objection was received during the course of the application which raised concerns with regard possible overdevelopment, the buildings overall height and the buildings impact on the surrounding area.

The assessment of the planning application below addresses the concerns raised in regard to height and design, in addition to the principle.

Internal/External Consultation

Environmental Health

The team noted that the site is within an air quality management area and therefore owing to the size of development, the applicant provided an air quality assessment and air quality neutral assessment undertaken by The Pes Ltd. The assessment methodology was accepted, along with the conclusion and therefore, no mitigation measures were required and the development was considered to meet the air quality neutral criteria.

While there is no objection or conditions required in relation to air quality, conditions have been requested for construction noise and dust and as a result of the submitted site investigation Geosmart Phase 1 Assessment a condition for investigation and remediation works has been required.

Further information has also been requested in relation to noise, given the sites proximity to the railway lines, and lighting for the new development. The have been secured through planning condition.

Thames Water

As the proposed development is located within 15m of a strategic sewer, Thames Water have requested a piling method statement, detailing the depth and type of piling to be undertaken as it could have the potential to significantly impact the local underground sewerage utility infrastructure. Additionally, with regard to surface water Thames Water have requested that the applicant demonstrate what measures would be taken to minimise groundwater discharges into the public sewer. Therefore, a groundwater risk management permit from Thames Water is required and the applicant should contact the team to arrange this. A condition and an informative relating to the above will be attached to the consent.

London Underground

Given the sites location close to railway infrastructure, while the team have no objection to the planning application, they have identified a number of potential constraints and recommended a condition.

While it is noted that the London Underground consultation response sought a condition which restricted the LU facing elevation to not contain openable windows, or balconies, the elevation to which this condition would have related would be situated approximately 13m from the railway at its closest point (excluding the 1st floor rear terrace which would be below the railway line and set away be approximately 11m). As such, it is considered that this would be a normal relationship with an active railway in an urban context, and would cause no potential harm to the railway and as such it is considered that that part of the proposed condition would not be appropriate and is therefore in this instance not considered to be required.

POLICY CONSIDERATIONS

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

The development plan is comprised of the
London Plan 2021
Brent Local Plan 2019-2041

Key policies include:

London Plan 2021

D1: London's form, character and capacity for growth

D3 – Optimising site capacity through the design-led approach

D4 - Delivering good design.

D5 - Inclusive design

D6 - Housing quality and standards

D7 - Accessible housing

D8 - Public realm

D9 -Tall buildings

D12 – Fire Safety

D13 – Agent of Change

D14 – Noise

H1 - Increasing housing supply

H2 - Small Sites

H4 - Delivering affordable housing.

H5 - Threshold approach to applications

E4 - Land for industry, logistics and services to support London's economic function.

E6 – Locally Significant Industrial Sites

E7 - Industrial intensification, co-location and substitution

G5 – Urban Greening

G6 - Biodiversity and access to nature

SI1 – Improving air quality.

SI.2 – Minimising Greenhouse gas emissions

SI4 -Managing heat risk.
SI.5 - Water Infrastructure
SI.13 - Sustainable drainage
T2 - Healthy Streets
T4 - Assessing and mitigating transport impacts
T5 – Cycling
T6 - Car parking
T7 - Deliveries, servicing and construction

Brent Local Plan 2019-2041

Policy DMP1 Development Management General Policy
Policy BP7 Southwest
Policy BSWGA1 Alperton Growth Area
BSWSA1 Alperton Industrial Sites
Policy BD1 Leading the Way in Good Urban Design
Policy BD2 Tall Buildings in Brent
Policy BH1 Increasing Housing Supply in Brent
Policy BH2 Priority Areas for Additional Housing Provision within Brent
Policy BH4 Small Sites and Small Housing Developments in Brent
Policy BH5 Affordable Housing
Policy BH6 Housing Size Mix
Policy BH13 Residential Amenity Space
Policy BE1 Economic Growth and Employment Opportunities for All
Policy BE2 Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS)
Policy BHC3 Supporting Brent's Culture and Creative Industries
Policy BGI1 Green and Blue Infrastructure in Brent
Policy BGI2 Trees and Woodlands
Policy BSUI1 Creating a Resilient and Efficient Brent
Policy BSUI2 Air Quality
Policy BSUI3 Managing Flood Risk
Policy BSUI4 On-Site Water Management and surface water Attenuation
Policy BT1 Sustainable Travel Choice
Policy BT2 Parking and Car Free Development
Policy BT3 Freight and Servicing, Provision and Protection of Freight Facilities
Policy BT4 Forming an Access on to a Road.

The following are also relevant material considerations include:

The National Planning Policy Framework 2023
Planning Practice Guidance

GLA Guidance

Accessible London SPG
Housing Design Standards LPG
Fire safety LPG (draft)
Housing SPG
Affordable Housing LPG (draft - May 2023)
Development Viability LPG (draft - May 2023)
Affordable Housing and Viability SPG
Play and Informal Recreation SPG
Air quality positive LPG
Air quality neutral LPG
Energy Planning Guidance

Brent Guidance

LB Brent S106 Planning Obligations Supplementary Planning Document (2022)
LB Brent Design Guide for New Development (SPD1)
LB Sustainable Environment and Development SPD (2023)
LB Brent Affordable Workspace (2022)
LB Brent Residential Amenity Space and Place Quality Supplementary Planning Document (2023)

DETAILED CONSIDERATIONS

Background

1. Application 19/3819 for a seven-storey building, accommodating 32 residential units was refused in 2020. The application failed provide a satisfactory level of industrial floorspace within a designated Locally Significant Industrial Site. The proposed height and proximity of the development to the suburban housing on Bridgewater Road was not considered an appropriate transition and relationship due to the overall scale of the building. The application was also refused on the basis that the northwestern flank elevation would result in unacceptable levels of overlooking to the occupants of No. 2 Bridgewater Road. The proximity of the habitable room windows along the southeastern elevation of the site failed to have an appropriate relationship with regards to the nature of the adjoining industrial location or development site, either for industrial or mix-use purposes as part of a development at this site.
2. Further to this an appeal was made and was dismissed by the Planning Inspectorate. It was concluded that the level of industrial floorspace was not sufficient and would fail to deliver an adequate level of employment land. The Inspector outlined that the proposal would either lead to an unacceptable loss of privacy for the occupants of No 2, or unsatisfactory living conditions for the occupants of Flat 2 due to poor outlook and concluded that it would conflict with Policy DMP1 of the BLPDMP which requires development to provide high levels of internal and external amenity. The inspector in this instance also concluded that the height of the proposed development would appear visually intrusive and would fail to provide an appropriate transition between the existing housing and the taller developments planned in the Growth Area. This matter is discussed further in this report.
3. Application Ref: 20/1151 was submitted and approved for a seven-storey building comprising of 28 new residential dwellings and 720sqm of industrial workspace. The modifications made to this scheme overcame the previous refused application and appeal decision outcome linked to application 19/3819. The changes to this scheme achieved a better relationship with the neighbouring property and provided a better transition in scale when considering the traditional two storey properties further northwest of the site. Furthermore, the provision of workspace was considered satisfactory and a s106 was entered into as part of the decision process. However, this development was not implemented, and subsequently this application has now expired, this site and its future is discussed in more detail below.

Proposal

4. The proposal is seeking to redevelop the site. The application has been accompanied by a statement setting out the proposed works. The proposal is seeking an eight-storey building, which would be one additional storey to the previously approved scheme of planning application 20/1151. The proposal would result in the provision of 32 new homes with the following unit mix:
 - 12 x 1 bedroom 2 person
 - 13 x 2 bedroom 3 person
 - 5 x 3 bedroom 4 person
 - 2 x 3 bedroom 4 person
5. The proposed development has been redesigned to allow for additional fire protection measures to meet updated Building Regulation requirements. The proposed development would also result in an additional four units within an additional storey over the previously consented scheme.

Industrial Floorspace

6. The application site is covered by a Locally Significant Industrial Site (LSIS) designation. Policy E4 of the London Plan identifies the importance of the retention, enhancement and provision of additional industrial capacity. London Plan Policy E4 Land for industry, logistics and services to support London's economic function suggests sufficient supply of land be maintained providing light and general industry.
7. The application site is covered by a Locally Significant Industrial Site (LSIS) designation. Policy E7 sets

out an approach to combining increased industrial capacity with the delivery of other planning objectives, by encouraging industrial intensification and co-location with other uses including residential, on suitable sites in locations well-connected by public transport. The policy seeks a plan-led approach to identifying areas within LSIS designations that are suitable for intensification and co-location.

8. The Local Plan has designated this site as an LSIS site (Alperton North) for intensification and co-location and as part of a growth area (BSWSA1: Alperton Industrial Sites), which seeks to incorporate a mixed-use redevelopment, of a potentially tall building involving co-location of housing and industrial uses.
9. The proposed development would be located within the northernmost part of allocated site BSWSA1, north of the Alperton Bus Garage site. These sites are generally low density Locally Significant Industrial Sites which have not maximised their development potential. The site allocation allows these sites to contribute to Brent's housing numbers within the designated Growth Area, as well as increasing the provision of industrial floorspace in line with London Plan requirements.
10. This is further reinforced within Policy BE2 of the Local Plan which looks to establish the framework to meet both housing need and industrial capacity, and land is identified where both can be provided (known as co-location). Policy BE2 highlights that the Council is committed to exceeding the additional 0.6 hectares equivalent of industrial floorspace need within the plan period. Within SIL and LSIS, as shown on the Borough Policies Map, development will be supported where it intensifies industrial uses, including those for waste, utilities and transport infrastructure and accords with the following principles.
11. On sites for intensification through co-location, proposal will be supported, subject to a comprehensive masterplan approach produced with or agreed by the council demonstrating the following will be achieved:
 - a) Conformity with London Plan policy E7.
 - b) a net increase in industrial floorspace resulting in a minimum 0.65 plot ratio or the existing floorspace total, whichever is greater, across the masterplan area.
 - c) a mix of research and development, light industrial, general industrial and storage and distribution floorspace will be delivered reflective of borough needs, including start-up and move on space.
 - d) proactive engagement with existing businesses to seek to retain them on site where possible, and support for any businesses that cannot be incorporated to relocate off site.
 - e) 10% of employment floorspace to be affordable workspace.
 - f) the development is of a high-quality design and will result in sustainable development, well served by community facilities and open space; and
 - g) any potential conflicts between uses can be mitigated and a high standard of amenity achieved
12. With regard to the industrial provision achieved, the proposed 720sqm was previously acceptable provision of workspace on site via application 20/1151. The site has an area of 1,165 sqm and a 0.65 ratio would therefore result in an industrial capacity of 756 sqm. This is higher than the existing amount of industrial floorspace on site (575 sqm). A total of 720 sqm of industrial floorspace is proposed, which is an increase over the existing floorspace but falls marginally (36 sqm) short of the 0.65 ratio. Nevertheless, it reflects the amount approved within the extant consent and only represents a minor shortfall and is considered to be acceptable having regard to constrained nature of the site which has splayed, irregular boundaries which affect the ability to deliver co-location with greater amounts of industrial space. The proposed use would fall within classes E(g)(ii) or E(g)(iii) and this would be secured through planning condition. It would be targeted at 'starter' and 'move on' units for small and medium enterprises, and studios for artists and cultural and creative industries. The space can be subdivided into a range of studio/unit spaces to cater for artists or creative industries. The units would have large, glazed frontages, ensuring the units appear active and providing passive surveillance, making the design secure and safe. In line with Policy BE2 of Brent's Local Plan and Policy E3 of The London Plan, as the site is situated within an LSIS at least 10% of the workspace should be provided as affordable. The applicant has agreed to an off-site affordable workspace contribution of £150,000 which will be secured through the legal agreement. The off-site contribution has been considered acceptable as should the policy be applied to the application 10% of the on-site unit would be 70sqm which wouldn't be of a sufficient type or

size to be considered to be a suitable offer for a provider in this instance due to the small quantum of floorspace. As required by policy the council have agreed to accept a payment in lieu to form part of a wider contribution for the Local Authority to produce a larger unit in future in another appropriate area.

13. Policy BSWG1 highlights that in addition to over 6,800 additional homes, Alperton will be encouraged to become an enterprise hub. Since the adoption of the Local Plan, it has also been designated as a Creative Enterprise Zone (CEZ). The Council's regeneration team have been involved in discussions around securing the affordable workspace. The provision of 720sqm of affordable workspace (Use Class E(g)) would contribute towards the aims of the creative enterprise zone.

Residential use

14. The London Plan Policy H1 sets out a new target of 2,325 new homes per year and this is reflected in policy BH1 in Brent's Local Plan 2019-2041. Policy BH1 sets out the need for the Council to maximise the opportunities to provide additional homes in the period to 2041, with a minimum 23,250 homes in the period 2019/20-2028-29 and a minimum of 46,018 homes in the period 2019-20-2040/41. The policy identifies Growth Area, site allocations and appropriate windfall sites to support the delivery of the additional homes. Moreover, London Plan Policy D3 Optimising site capacity through design-led approach requires all developments to make the best use of land by optimising the capacity of sites.
15. Policy BH2 sets out priority areas for additional housing provision within Brent. In addition to Growth Area and Site Allocation, policy BH2 identifies town centres, edge of town centres, areas with higher levels of public transport accessibility levels and intensification corridors as priority location where the provision of additional homes would be supported. As the site is under 0.5 hectares, it would be defined as a small site within both London Plan (Policy H2) and Brent's Local Plan (policy BH4). this policy highlights that boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan-making in order to amongst other considerations achieve the minimum targets for small sites as part of overall housing targets and increase the contribution of small sites to meet London's housing needs.
16. Policy BP7 further promotes residential-led mixed-use development within the Alperton Growth Area and co-locating residential uses on areas of industrial and employment land within the Alperton Growth Area, taking advantage of areas well-served by public transport. The site allocation BSWSA1 allocates the site as part of a wider site allocation for a mixed-use scheme co-locating residential units with existing industrial and commercial uses. As identified above policy BE2 supports an intensification through co-location at Alperton (in this instance the Alperton North LSIS) and as such the introduction of the residential use on site can be supported. The proposal would provide new housing within the Alperton Growth Area, with its good access to public transport. As such the introduction of high-density residential development on site can be supported alongside the proposed workspace provision on the ground floor.
17. The proposal would provide 32 new homes in an accessible location within the Alperton Growth Area. The introduction of housing in this location continues to be supported and remains in line with Policies BH2, BH4 BSWSA1 and BE2 of Brent's Local Plan.
18. The proposal would make a significant contribution to the Borough's housing targets and is considered to be acceptable in principle subject to other material planning considerations.

Affordable Housing and Housing Mix

19. London Plan Policies H4, H5 and H6 set out the mayor's commitment to delivering 'genuinely affordable' housing. Policy H6 requires affordable housing provision to include a minimum of 30% low cost rented homes, allocated according to need and for Londoners on low incomes (Social Rent or London Affordable Rent); a minimum of 30% intermediate products; and 40% to be determined by the borough based on identified need.
20. Brent's Local Plan Policy BH5 supports this approach and sets a target of 70% of affordable homes being for social rent or London Affordable Rent and the remaining 30% being for intermediate products. This split marries up with London Plan Policy H6 by design, with Brent having considered that the 40% based on borough need should fall within the low cost rented homes category.
21. Fast tracked applications are not required to provide a viability assessment at application stage. To ensure an applicant fully intends to build out the permission, the requirement for an Early-Stage Viability Review will be triggered if an agreed level of progress on implementation is not made within two years of

the permission being granted (or a period agreed by the borough).

22. Where an application does not meet the above requirements set out in Part C of Policy H5, it must follow the Viability Tested Route. This requires detailed supporting viability evidence to be submitted in a standardised and accessible format as part of the application.
23. Viability tested schemes will be subject to:
 - a) an Early-Stage Viability Review if an agreed level of progress on implementation is not made within two years of the permission being granted (or a period agreed by the borough)
 - b) a Late-Stage Viability Review which is triggered when 75 per cent of the units in a scheme are sold or let (or a period agreed by the borough)
 - c) Mid Term Reviews prior to implementation of phases for larger schemes.
24. The proposed development has been assessed for its ability to deliver affordable housing on-site in line with local and regional planning policies. However, a detailed financial viability assessment has determined that the scheme cannot viably support on-site affordable housing provision without compromising the overall deliverability of the project.
25. As noted above, a Financial Viability Appraisal was prepared and submitted to support the planning application. The report demonstrates that the scheme is technically unviable and unable to support an affordable housing contribution, however, a without prejudice offer of has been made to the Council in the acknowledgement of the above policy perspective which has been independently verified and confirmed to be an appropriate and acceptable offer for an off-site contribution. The financial viability appraisal resulted in the applicants and the Council's independent advisors agreeing a site value of £1,262,500, and a residual land value (with a payment in lieu included) of the same. As such, the Council and the applicants agree that there is a break-even position when the £185,470 is provided. Therefore, the independent assessment concluded that the payment in lieu contribution of £185,470 would breakeven against the benchmark land value and would therefore represent the maximum viable contribution towards affordable housing. An early and late stage upward only review mechanism would be secured through the s106 legal agreement to ensure that any future improvements in viability are captured, and the benchmark values for such a mechanism have been agreed in principle.
26. It should be noted that during the course of the application, the possibility of providing on-site affordable housing was tested, however the surplus would not have been substantial enough to equate to the delivery of even a single on-site affordable housing unit. Therefore, in this instance, a payment in lieu is considered to be policy compliant, and acceptable.
27. Given the financial constraints demonstrated by the viability assessment, requiring on-site affordable housing would render the development unviable. The developer has agreed to provide an off-site contribution (as above) which allows for the development to proceed while ensuring that the Local Authority can allocate these funds to affordable housing projects elsewhere in the borough. This approach aligns with policy objectives by facilitating the delivery of affordable housing in a manner that is both financially viable and beneficial to the Borough. The off-site contribution would be secured under a legal agreement. This compromise ensures that the development can proceed, and on balance is considered to be acceptable in this instance, for the reasons set out above.

Housing Unit Mix

28. The proposal would provide the following mix of homes:

	1bed	2bed	3bed	Total
Units	12	13	7	28
% of total	37.5%	40.6%	21.87%	100%

29. Policy BH6 states that the council will seek to deliver a target of 25% of new homes as family sized (3 bedrooms or more) dwellings. For every four dwellings included within developments at least one must be 3 bedrooms or more. Exceptions to the provision of family sized dwellings will only be allowed where

the applicant can show that:

- a) the location or characteristics of the development are such that it would not provide a high-quality environment for families, or
 - b) its inclusion would fundamentally undermine the development's delivery of other Local Plan policies
30. There is a slight shortfall of the number of family units proposed, the previous scheme did see Policy BH6 met, however, as part of this submission and owing to the unviable position of the scheme the maximum number of family units have been provided and this has been demonstrated within the financial viability appraisal and as such, when considered against the contribution offered, the minor shortfall of 1 home is considered to be acceptable in this instance.

Design, Character and Impact on the Street Scene

31. Policy DMP1 sets out the need for development proposals to be:

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

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

32. Policy BD1 highlights the need for all new development must be of the highest architectural and urban design quality. Innovative contemporary design will be supported where it respects and complements historic character but is also fit for the future.
33. In delivering high quality design, development proposals will be expected to show how they positively address all the relevant criteria within London Plan design policies and the Brent Design Guide SPD1.
34. SPD1 outlines that development should respond to the local context and respect the existing character of the landscape, streetscape, architectural and historic environment. New development height, massing and façade design should positively respond to the existing context and scale, facilitating good urban design.
35. Building heights should positively respond to existing character. Development massing should limit its visual impact by effectively breaking up facades, creating a varied roofscape and relating positively to existing surroundings. It further outlines that buildings should generally fit in with the existing character of roof types within the streetscene and minimise the visual impact from street level.
36. The areas directly southeast of the application site currently occupy industrial type buildings which are part of the wider site allocation and designated for higher density type of developments, however the application site is on the periphery of this wider allocation. Traditional two storey residential properties are situated directly south and northwest of the application site, but the properties to the west on Bridgewater Road are designated within the Local Plan as an intensification corridor.

Height

37. Policy BD2 notes that a tall building is one that is more than 30 metres in height above ground level. Tall buildings are directed to the locations shown on the policies map in Tall Building Zones. In Tall Buildings Zones heights should be consistent with the general building heights above ground level shown on the policies map, stepping down towards the Zone's edge.
38. In intensification corridors and town centres outside conservation areas and areas of distinctive residential character developments of a general building height of 15 metres above ground level could be acceptable, with opportunities to go higher at strategic points in town centres.
39. In all cases the tall buildings must be shown to be positive additions to the skyline that would enhance the overall character of the area. They should be of exceptional design quality, consistent with London Plan Policy requirements in showing how they positively address their visual, functional, environmental and cumulative impacts.
40. The site is situated within a Tall Building Zone and an intensification corridor. The western portion of the proposed development would have a stepped approach which would start at two stories, rise to four stories and then increase to an eight-storey element which would be positioned towards and cover the

central and southeastern part of the site, away from the existing two storey residential development.

41. It is considered that the proposed height is in this instance considered to be appropriate for this relationship when the traditional suburban nature of the properties located directly west of the application is taken into consideration. On balance, it is considered that the proposed stepped approach with a maximum height of eight stories would be a suitable transition in relation to the low-rise properties to the west and the taller developments established towards the core of the Alperton Growth Area.
42. It is noted that a previous consent on this site allowed for a seven-storey building, while the current application increases this overall height by one additional storey which is considered to be acceptable in this tall building zone and intensification corridor. The proposed development under consideration here would be largely similar to the previously refused scheme on this site in terms of scale and bulk, and in that instance an Inspector concluded that the proposed height would cause harm to the character and appearance of the area.
43. As the site and its wider area is situated within an Intensification corridor, the area is subject to potential change, through the increases in height. As such, the two-storey buildings along Bridgewater Road would support additional height increases in these areas of up to 5 storeys, and therefore given the policy context the increase in height from a potential 5 storeys to a maximum 8 as is subject of this proposal would be considered acceptable without creating significant visual harm.
44. While the height and massing of the proposed development would impact the character and appearance of the area, it is considered that the impact of the additional storey is outweighed by the significant benefit of delivering additional housing, at a time when there is a housing crisis due to the shortage of homes within Brent, London and the Country as a whole. It is also noted that at the time of the Inspectors decision, policy BD2 (Tall Buildings) of the Brent Local Plan was not yet adopted, nor was the 2021 London Plan. The housing targets within the 2021 London Plan are significantly higher than the previously adopted document, increasing from 42,000 homes per annum to 52,000 homes per annum, with a focus on smaller sites. The 2021 Plan also broadly increases housing targets for outer London boroughs, with Brent's housing target raising from 1,500 homes per year to over 2,300.
45. Overall, the proposed height of the new building would sufficiently accord with the surrounding context and would have an acceptable relationship with the established built form to the west of the application site and future high-rise developments further southeast, while providing much needed residential accommodation.
46. Alperton Underground Station is also a Locally Listed Heritage asset, which is sited 583m from the application site. It is not considered that given the urban environment and the cluster of taller buildings located a closer distance to the station in this location that the development proposals would be visible and therefore cause harm to the heritage asset. As such, it is not considered that the development would harm this locally listed heritage asset.
47. Overall, it is considered that the proposed height of the development – including its staggered height moving away from nearby existing two storey residential buildings – would suitably compliment the surrounding pattern of development and overall massing, and would allow for the introduction of taller, denser residential development within parts of this allocated site located within a Growth Area, allowing for the most efficient use of the site.

Layout

48. The proposed front building line would be set back from the highway by a 9m distance from Ealing Road and would include a public pathway and soft landscaping acting as a buffer between the adopted footpath and the proposed built form. It is noted that the proposed front building line would extend beyond the front building line of No. 2 Bridgewater Road by 2.9m. This is considered an acceptable projection forward given the separation distance with this neighbouring property. Furthermore, the proposed front building line would complement that of the proposed commercial building located to the front segment of the adjoining property.
49. It is noted that the ground floor element of the proposed development would be positioned next to the southeastern splayed boundary. The proposed first floor, second floor and third floor portions of the development would be sited within close proximity of the stepped flank boundary red line however sufficient separation distances would be achieved with the development at the adjoining site. The

proposed blue badge space would contain a gate for personal safety reasons for any potential user.

50. The proposal would incorporate a new pathway along Bridgehill Close which would direct future residents towards the entrance along this elevation. This would result in a suitable environment for residents with elements of active frontage provided via window on this side elevation serving the ground floor commercial space. This arrangement further enhances Bridgehill Close for potential footfall for One Tree Hill Recreation Ground users. Additional lighting details have been conditioned which would further improve this area for future users when compared to the existing situation.
51. The development would provide areas surrounding the site that would be utilised both by the residents and users of the commercial workspace. As such, the level of pedestrian footfall that would generate would suggest that the areas of public realm would be utilised for most of the day and evening. The proposed residential entrance would provide good levels of activity along Bridgehill Close which would benefit the area.

Architecture and Materially

52. SPD1 states that the use of durable and attractive materials is essential in order to create development that is appealing, robust and sustainable and fits in with local character. Within Brent, the predominant building material used is brick, with smaller amounts of roughcast, pebbledash and render. Brick has over time proved to be a successful material, with strong aesthetic credentials to assist in creating high quality neighbourhoods. Brick and other natural materials and elements of small dimensions create visual interest through patterns and depth.
53. The Design and Access Statement submitted with the application reveals that the primary material will be brick and compatible mortar, articulated with a horizontal banding of precast concrete. A light warm grey coloured brick for the main body of the building is proposed with dark grey brick recessed panels. Precast concrete ribbons would wrap around the building every two storeys and form the ground floor colonnade.
54. Concrete would also form the proposed ground and first floor colonnade, acting as a trellis for climbing plants, to add a vertical dimension to the landscaping and encourage biodiversity along the busy Bridgewater Road. The proposed windows would be framed in powder-coated thermally broken aluminium frame. The balconies slabs would be finished in precast concrete with structural glazed clear panels capped with a matching powder-coated aluminium handrail. The principle of the proposed materials is considered to be of a sufficiently high quality and would positively complement the area. A condition has been recommended requesting precise details of the materials to ensure the highest possible quality of brick, and other finishing materials such as windows and doors.
55. The ground floor would incorporate large panel glazing to the front and side elevation facing Bridgehill Close promoting good quality active frontages from street level. The main entrance to the residential units would be situated along Bridgehill Close bring this roadway in to use pedestrians. A 2m pathway would be created adjacent to the building for pedestrian footfall which in turn would provide access to the rear portion of the site. This concept is generally acceptable however appropriate lighting would be required to ensure this access would result in a safe environment for any potential users. Such details would be secured as a condition on any forthcoming consent.
56. Refuse storage, plant room and cycle parking would be located to the rear portion of the building which is sensible, and this provides the opportunity for commercial active frontage facing Bridgewater Road. The location of the commercial cycle store has been revised next to the commercial bin store to improve natural surveillance of the entrance. The bin stores to the residential and commercial uses would contain separate accesses. As outlined above, the proposed blue badge space would be gated for security purposes.

Quality of Accommodation

57. New residential homes should meet with or exceed the minimum internal space standards contained within London Plan policy D6. The policy highlights that new homes should be provided with adequate levels of outlook, daylight and natural ventilation, which is supported by Council's Design guide SPD 1 (2018).
58. Policy D6 of London Plan sets out that housing developments should be of high-quality design and provide adequately sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures. Part (c) highlights that housing

developments should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in Policy D3 Optimising site capacity through the design-led approach than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.

59. Part F of Policy D6 sets out that housing developments are required to meet the minimum standards below which apply to all tenures and all residential accommodation that is self-contained.
- Dwellings must provide at least the gross internal floor area and built-in storage area set out in Table 3.1.
 - A dwelling with two or more bedspaces must have at least one double (or twin) bedroom that is at least 2.75m wide. Every other additional double (or twin) bedroom must be at least 2.55m wide.
 - A one bedspace single bedroom must have a floor area of at least 7.5 sq.m. and be at least 2.15m wide.
 - A two bedspace double (or twin) bedroom must have a floor area of at least 11.5 sq.m.
 - Any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (If the area under the stairs is to be used for storage, assume a general floor area of 1 sq.m. within the Gross Internal Area).
 - A built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. Any built-in area in excess of 0.72 sq.m. in a double bedroom and 0.36 sq.m. in a single bedroom counts towards the built-in storage requirement.
60. The minimum floor to ceiling height must be 2.5m for at least 75 per cent of the Gross Internal Area of each dwelling.
61. The table below sets out the minimum internal floor space requirement for each unit type.

Type of dwelling		Minimum gross internal areas and storage (square metres)			
Number of Bedrooms	Number of bed spaces	1 storey dwelling	2 storey dwelling	3 storey dwelling	Built-in storage
1b	1p	39 (37)* Shower room instead of bathroom = 37	N/A	N/A	1
	2p	50	58	N/A	1.5
2b	3p	61	70	N/A	2
	4p	70	79	N/A	2
3b	4p	74	84	90	2.5
	5p	86	93	99	2.5
	6p	95	102	108	2.5

62. The new homes would meet the above standards and are considered to be of a sufficient quality. The proposed development would result in a high proportion of dual aspect units in accordance with the Housing Quality LPG. There would also be some triple aspect units which is welcomed and the amount of daylight, sunlight and ventilation within the proposed development is considered to result in a good quality of accommodation for future residents.
63. An assessment has been provided which assessed the levels of daylight and sunlight that each flat would receive. The assessment considered daylight exposure, sunlight exposure and overshadowing for the proposed dwellings that are going to experience the least light – these generally being those on the lower floors to the rear of the building and are discussed in more detail below.
64. There would be secure entrances in locations which are overlooked so as to maintain security, and in turn would overlook public areas in a more positive way than the existing buildings do. It is noted that there are no more than six units per core per floor, which accords with GLA guidance. The units generally accord with the minimum room sizes within the London Plan, are logically laid out and would have good

outlook. There are no single aspect units proposed. The two residential entrances would be accessed from Bridgewater Close. The homes are located at first floor level and above.

65. The submitted drawings indicate that all the units would meet the minimum space standards set out by the London Plan. Furthermore, each single bedroom would require a GIA of 7.5sqm with a width of at least 2.15m and each double-bedroom should have a floorspace of 11.5sqm and should be at least 2.55m wide. Every other additional double (or twin) bedroom must be at least 2.55m wide. The submitted drawings have demonstrated that the above has been achieved.
66. Of the 32 units proposed, all units would be dual or triple aspect outlook which is welcomed.
67. London Plan policy D6 also requires at least 75% of the GIA of each flat to have an internal floor-to-ceiling height of 2.5m. Each home would achieve an internal floor to ceiling height of over 2.5m in line with Policy D6.
68. In terms of privacy, SPD1 outlines that new development should provide adequate privacy and amenity for new residents and protect those of existing ones. Development should ensure a good level of privacy inside buildings and within private outdoor space. Directly facing habitable room windows will require a minimum separation distance of 18m, and habitable room windows should be positioned 9m away from neighbouring rear gardens. Brent's SPD 1 Design guide states that balconies should not overlook the habitable room windows or gardens of adjoining properties.
69. While it is noted that the adjoining sites (2a Bridgewater Road) previously approved application (19/4541) has now expired due to the development not being implemented within 3 years of the consent was granted, the overall design and massing would have been broadly supported today given the sites location in the wider growth area and tall building zone. While this application seeks to add an additional storey to the previously consented massing and the development at the adjoining site has now expired, it is considered that the as the site allocation as set out within the Local Plan would support additional residential accommodation in taller buildings, a similar form of development would be likely to come forward at the adjoining site in the future. Given the change that the locality is experiencing with regard to growth, it is not expected that the site will remain in a low rise, non-residential use in perpetuity and as such the assessment carried out below broadly reflects the design principles of how the site which previously achieved consent was approached.
70. It would be expected that the northwestern portion of the site would be sited approximately 13m from the shared boundary and the elevation of the other additional blocks on site would occupy the southern portion of the site which was previously identified to be approximately 8m from the splayed boundary. The site also had allocated another block which did not present any residential uses, which was the area closest to the development site which was consented at the time of submission. The splayed windows to the bedrooms that would direct outlook at an angle over the application site rather than directly into 2a Bridgewater Road reflect the situation of the consent at the time of submission. The balconies of these flats would also have a flank wall screen to prevent direct overlooking into 2a Bridgewater Road, and this would be retained to be secured as a planning condition for any future consent.
71. The residential windows linked to the flats situated at the front portions of the site would also be set in appropriately from the shared boundary treatment and as highlighted above, the expired consent had approval for a building that did not facilitate any residential units. As such given the re-orientation of the windows to southeastern flank elevation and the overall distance achieved with neighbouring site at the point of submission the proposal is considered to be acceptable. Should this site not come forward, the massing and scale of the development proposed for the reasons given above would be suitable and would optimise the site capacity, so while there may be an impact upon the low-rise industrial units in situ at present the contribution of housing of a high quality within this proposal would outweigh the harm to this industrial building.

External Amenity Space

72. Policy BH13 establishes that all new dwellings are required to have external private amenity space of a sufficient size and type to satisfy its proposed residents' needs. This will normally be expected to be 50sqm for family homes located at ground floor level (three or more bedrooms) and 20sqm in all other cases.
73. The BH13 requirement for external private amenity space established through BH13 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.

74. With regard to quality of the space, the supporting text to policy BH13 specifies that private amenity should be accessible from a main living room without level changes and planned within a building to take a maximum advantage of daylight and sunlight, whilst Brent SPD1 specifies that the minimum depth and width of the space should be 1.5 m.
75. 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. The minimum depth and 1.5 m is reconfirmed in the policy.
76. Moreover, the Council adopted the Brent Residential Amenity Space and Place Quality supplementary Planning Document on 12th of June 2023. The SPD provides guidance on planning matters related to the provision of residential amenity space and public realm within developments.
77. In line with the above, the development cumulatively should achieve 640sqm, as the units are above the first floor level, each of the 32 units would be required to demonstrate 20sqm each. The area of the site given to balconies is 403.7sqm, which results in a shortfall of 264.8m of amenity space per unit. The development includes a 260.4sqm of amenity on the 8th floor roof, 89sqm on the 4th floor roof and 82.6sqm on the first floor roof(the 4th and 1st floor roofs also includes play areas). The communal space resulting in 432sqm area sufficiently mitigates the shortfall of amenity space on the site for balconies alone which is acceptable. There are some smaller balconies, which have areas of 3.3sqm, and some larger balconies which measure 28sqm. However, while there is a shortfall in some of the balcony areas, they measure 1.5m deep and are appropriately sited with good orientation towards the open space to the rear where possible. The communal spaces would be accessible for all residents of all floors and would be accessible from the main core. The communal space at first and fourth floors provided have been positioned accordingly allowing some natural surveillance from the balconies, in addition to providing an appropriate balance of informal social activity and play opportunities. It is considered that the areas would provide a sufficient level of space to meet the requirements for the residents of the development. The primary paths and circulation are well arranged from the residential cores, providing a journey through the spaces which provide benches and furniture, surrounded by buffer planting and defensible planting where necessary. The spaces are considered to be suitable with a variety of areas for outdoor amenity and play.
78. The main children’s play areas are on the first floor and fourth floors. It is anticipated that the first floor would contain stepping stone, balancing logs and sand pit. These areas would measure 5sqm. The fourth floor would also include an astro turf area which is more flexible space for young people to use which measures 89sqm. Furthermore, the proposed flexible communal space on the roof would measure approximately 260sqm. The GLA population yield calculator indicates the development should provide 180sqm play space. The level of amenity space and play space outlined above is satisfactory. Furthermore, the site is within close proximity to the play space situated at One Tree Hill Recreation Ground, accessed through an adjacent tunnel beneath the Piccadilly Line.
79. Overall, the residential accommodation proposed is considered to be of high quality and to comply with the relevant policies. Furthermore, the provision of amenity space is considered to be very good in terms of the amount and type of space proposed, and fully compliant with the relevant policies. Further details of hard and soft landscaping proposals for the communal amenity space would be required by condition.

Accessible Homes

80. In line with London Plan policy D7, 10% of new dwellings should be designed to M4(3) standards and the remainder to be M4(2) standards. The submitted plans show 3 of the homes designed to M4(3) standards and the remainder to M4(2) standards. This would result in 9.4 % of the homes being wheelchair accessible. While this falls marginally below the 10 % requirement, this minor shortfall is considered to be acceptable on balance and a compliance condition will be attached to ensure that 3 of the new homes to be designed to M4(3) standards.

81. The proposal includes 3 wheelchair accessible dwellings:

Accessible Unit No.	Dwelling Type
Flat 6	1 bed 2 person
Flat 7	1 bed 2 person

Flat 12	1 bed 2 person
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82. A condition securing these units will be attached to any consent.

Internal daylight and sunlight

Daylight

83. An internal daylight and sunlight report has been carried out in accordance with Building Research Establishment's Report 209 "Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice" (2022 3rd Edition).
84. Internal Daylight has been assessed using Spatial Daylight Autonomy (SDA). The SDA is used to calculate the illuminance from daylight at each point on an assessment grid placed within the room at the working plane at hourly intervals for a typical year. Target illuminance (ET) for bedrooms is 100 lx, for living rooms, 150 lx and kitchens, 200 lx. These levels should be achieved across at least 50% of the working plane in a daylit space for at least half of the possible daylight hours. It should be noted that the first two levels of the development have been assessed for their internal daylight and sunlight as it is considered that these would have the largest impacts, and windows at upper levels from this would have better outlook.
85. The results confirm that around 91% of all habitable rooms tested meet or surpass the BRE minimum illuminance recommendations (i.e. 8 of the total 91 rooms fall short of their Daylight Factor targets). This is considered to be a very high level of compliance in the context of an urban development site.

Sunlight

86. The BRE guide requires that the sunlight testing is applied to rooms of all orientations, noting that rooms facing north of due east or west are unlikely to meet the targets.
87. BS EN 17037 recommends that a space should receive a minimum of 1.5 hours of direct sunlight on the 21st March (equinox). For dwellings, at least one habitable room, preferably a main living room, should meet at least the minimum criterion.
88. The orientation of the site will play a big role in the proposal's compliance with this test. Obviously not all sites are well situated to receive direct sunlight, so a flexible approach is recommended on this basis.
89. In the case of the proposed development, 18 of the 32 units have a living room which receives a total of at least 1.5 hours of sunlight on 21 March. The assessment noted that the proposed development represents good site layout design, which maximises the sunlight availability, as far as practicably possible given the constraints of the site, the BRE exposure to sunlight recommendations for groups of dwellings have been met.

Overshadowing to external amenity spaces

90. The BRE guide recommends that at least 50% of the area of each amenity space should receive at least two hours of sunlight on 21st March.
91. The results show that the first floor amenity space falls slightly short of the BRE recommendations. However, there are additional amenity spaces that the residents will have access to that exceed the BRE sunlight recommendations.

Conclusion

92. The levels of daylight and sunlight received by the new homes and amenity spaces within the development are considered to be appropriate for a scheme of this density. It is also noted that residents will be able to access a variety of amenity spaces throughout the site, with the majority of these meeting BRE guidance levels for sunlight. The proposal is considered to be acceptable in relation to the levels of internal daylight and sunlight.

Impacts on Microclimate

93. London Plan Policies D3, D8 and D9 emphasise the importance of the local microclimate created by new development involving tall buildings, in particular the need to ensure comfortable wind conditions. As part of this application a Wind Microclimate Assessment has not been provided, and one did not accompany the extant consent. It is therefore not considered necessary and further information has not been required

as the proposal is of the same scale and massing as the extant consent.

Managing heat risk

94. London Plan Policy S14 expects all new proposals to minimise adverse impacts on the urban heat island through design, layout, orientation, materials, and the incorporation of green infrastructure. Major proposals should demonstrate how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:
95. Reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure;
- Minimise internal heat generation through energy efficient design;
 - Manage the heat within the building through exposed internal thermal mass and high ceilings;
 - Provide passive ventilation;
 - Provide mechanical ventilation; and
 - Provide active cooling systems.
96. The energy and sustainability statement confirms that overheating risk was considered early in the design process to ensure compliance with relevant standards. Suitable passive measures have been incorporated within the building envelope and services design to mitigate overheating and reduce cooling demand. The measures proposed include concrete floors to offer thermal mass absorption during the summer months, in addition to mechanical ventilation and passive ventilation. The lighting within the building would also be high efficiency with LED lamps.
97. It is also noted that all of the units proposed within the development would be dual or triple aspect and each unit has openable windows, which would allow for ventilation, the building is also a brick building with deep reveals to offer shade within these habitable rooms and allow a regulation of the internal heating levels.
98. The strategy sets out that the development with all dwelling areas and the majority of accommodation would seek to limit solar gains within the units and the building is considered to appropriately manage the heat risk.

Impact on Neighbouring Occupiers

99. The below assessments are based upon the context of the site at the point of submission, whereby the adjoining site had an extant planning consent for a number of buildings in residential uses. While the site has since expired, given the site allocation and growth area, it is expected a comprehensive redevelopment of the site would still be expected to come forward in the future. In the absence of further details of this growth, the daylight and sunlight and impact assessments as previously carried out have been retained as below, should the site be resubmitted for consent in the future it provides a reasonable expectation of where the habitable rooms and areas of amenity space could be sited.

Impact on neighbouring residential amenity

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

Privacy

101. In order to retain acceptable privacy levels to properties, SPD1 states that development should ensure a good level of privacy inside buildings and within private outdoor space. Directly facing habitable room windows will normally require a minimum separation distance of 18 m, except where the existing character of the area varies from this. A distance of 9 m should be kept between gardens and habitable rooms or balconies. Reduced distances between new frontages may be acceptable subject to consideration of overlooking and privacy as well as high quality design and solutions which can sometimes mitigate impacts and allow for efficient use of land. development's performance against them are explained below.

102. In terms of the relationship with No. 2 Bridgewater Road, the proposed flank elevation of the proposed development would achieve a separation distance of approximately 8m from the side elevation of this neighbouring property. It is noted that the flank elevation of No.2 contains two upper floor side windows that do not serve habitable rooms. Therefore the 8m separation distance achieved along this portion of the development is considered an acceptable relationship on this occasion. The elements extending beyond the rear building line of No.2 would be set in from the boundary by approximately 9m, this relationship is identical to that previously approved and as the consent is extant this is a material consideration and is on balance considered to be acceptable.

103. A distance of over 30m is maintained to the properties on the southern side of Bridgewater Road. The proposal is therefore considered to not result in unacceptable levels of overlooking to existing residential properties and complies with policy DMP1.

Overbearing Appearance

104. SPD1 sets out that new developments should normally sit within a line drawn at 30 degree from the nearest rear habitable room window of adjoining development (measured at 2m high from internal floor level) and sit within a line drawn at 45 degree from the neighbouring private rear garden area (measured at 2m above garden level), The 1:2 rule should be applied in respect of extending to the rear of adjacent dwellings (the rear building line should not project further to the rear than half the distance between the proposed flank wall and the centre point of the nearest existing rear habitable room window. This is to ensure that a development does not appear overbearing or adversely impact on outlook.

105. In this case, there are no residential properties directly to the rear. The rear garden of No. 2 Bridgewater Road is separated from the application site by Bridgehill Close, but nevertheless, given the degree of change, would not comply with the 45 degree or 1:2 guidance. Nevertheless, the application site is within a growth area and tall building zone, and a greater degree of impact results due to the need to intensify the use of this site to allow the provision of new homes and industrial space in line with policy. Nevertheless, the impact of the proposal upon daylight and sunlight to neighbouring sites does need to consider and this is discussed below.

Daylight and Sunlight

106. Policy D6 (part D) of London Plan highlights the need for development to provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

107. Where buildings would be within a 25-degree line of existing windows, the Building Research Establishment considers that levels of light to these windows could be adversely affected and recommends further analysis of the impacts. A more detailed assessment of daylight and sunlight impacts based on the BRE's Site Layout Planning for Daylight and Sunlight (BRE209) 2022 guidance is required where the 25-degree test is not met. This guidance supersedes the 2011 version, however the advice in relation to assessing the impact on neighbouring properties remains consistent with the earlier version.

108. In support of the application a Daylight and Sunlight Report has been submitted, which assesses the effect of the proposed development on surrounding properties as well as within the proposal itself (discussed above)

109. In terms of impacts on daylight and sunlight to neighbouring properties, BRE Guidelines recommend two measures for daylight. Firstly, the Vertical Sky Component (VSC) assesses the proportion of visible sky and is measured from the centre of the main window. If this exceeds 27% or is at least 0.8 times its former value, residents are unlikely to notice a difference in the level of daylight. In addition, existing daylight may be affected if levels of No-Sky Line (NSL) within rooms are reduced to less than 0.80 times their former values.

110. In respect of direct sunlight and overshadowing, the 2022 BRE guidance recommends that a space should receive a minimum of 1.5 hours of direct sunlight on a selected date between 1st of February and 21st of March with cloudless conditions. It is suggested that 21st March (equinox) be used for the assessment.

111. To assess impacts on sunlight to existing south facing windows and amenity spaces, assessment of Annual Probable Sunlight Hours (APSH) is recommended. Adverse impacts occur when the affected window receives less than 25% of total APSH including less than 5% in winter months and that the

amount of sunlight, following the proposed development, is reduced by more than 4%, to less than 0.80 times its former value.

112. The BRE guide defines criteria by which to assess the impact of a proposed development on open spaces using the sunlight amenity test. This test quantifies the area of each space that receives at least two hours of sunlight on the 21st of March, in both the existing and the proposed situations. The 21st of March is chosen as it represents the mid-point of the sun's position throughout the year (equinox). The guidance suggests that, for a space to appear adequately sunlit throughout the year, at least 50% of its area should receive two or more hours of sunlight on the 21st of March. If the space fails to meet the above, then the area receiving at least 2 hours of sunlight should not be reduced to less than 0.80 times its former area.
113. The assessment has considered all the closest neighbouring residential properties with windows overlooking the proposed development, in addition to an assessment of the adjacent site which had previously achieved consent for a 19 storey building under LPA: 19/4541. While consent for this has now expired, the proposal set out the way in which this site could come forward, and as such, should this site come forward in the future the existing assessment has been included within the summary below.
114. Additionally, while the consent at the adjacent site has expired, the site is a single storey warehouse building without residential uses on site, and as such it is not considered that there would be any impact upon habitable room windows at this site, in the absence of them. While at the time of the extant consent, the adjacent site had a consented scheme, the impact was considered to be acceptable, and as the scheme can now not be implemented the impact is considered to be even lesser as it is a low lying, industrial site as existing.
115. Notwithstanding the above, the neighbouring properties assessed are 1 to 6, 9 to 11, 13, 15, 17, 19, 21, 23 and 25 Bridgewater Road in addition to the previously consented site discussed above 2a Bridgewater Road.

Vertical Sky Component

116. All windows except for one at No. 2 Bridgewater Road would pass the VSC (Vertical Sky Component) test, except for certain windows at the adjacent site at 2a Bridgewater Road, where planning permission has expired. Mitigating factors include the presence of additional windows in the affected rooms that meet VSC recommendations. Bedrooms impacted by the lower VSC values are less critical in daylight terms, as per the BRE guide. Importantly, living areas, which require more daylight, are sufficiently serviced. The proposed development's VSC values align with London's urban expectations, ensuring it would not hinder a high-quality residential development at the expired site.
117. The rooms served by windows 183, 196, 201, 209, 214, 217, 220, 222, 225 and 228 benefited from an additional window of the same size that meets the VSC recommendations.
118. Windows 184, 186, 197, 199 and 212 would also have served bedrooms. The BRE guide states that daylight is required in living rooms, kitchens and bedrooms. In the context of daylight distribution, the guide states that bedrooms are less important. The guide does not distinguish between the relative importance of daylight in respect of VSC. However, given that the bedrooms would generally have greater use in the evening, a greater weight should be placed on the importance of ensuring that living rooms achieving maximum daylight during daytime hours.
119. The living/kitchen/dining served by windows 187 and 188 has no additional windows. Window 187 would however, retain a VSC value of 25.3%. As noted above, it can generally be accepted that for large schemes in London a VSC of around 20% or more is considered reasonably good, and VSC's in the mid-teens can be considered acceptable around 15%, owing to the dense urban environment of London.
120. Moreover, it is worth highlighting that the BRE guidance gives numerical guidelines and it states that these should be interpreted flexibly, since natural daylight is only one of the many factors in site layout design.
121. With regard to the two-storey buildings along Bridgewater Road, all windows assessed would pass the VSC assessment. With the only instance of 11.4% loss serving a non-habitable room on the flank elevation of No. 2 Bridgewater Road.

Daylight Distribution

122. The daylight distribution test has been carried out where room layouts are known. All rooms with a requirement for daylight pass the daylight distribution test, with the exception of the rooms served by windows 184, 186, 187, 188, 197, 199, 200 and 201, 210, 222, 213 and 214. There are some mitigating

circumstances for these rooms, such as the rooms served by windows 184, 186, 197, 199, 210 and 212 are bedrooms, which as above are not as well used during daylight hours and therefore lighting can be considered to have less importance in these rooms.

123. The before and after assessments for the rooms served by windows 187 (LKD), 188 (LKD), 200 (LKD), 201(Secondary LKD), 213 (LKD) and 214 (Secondary LKD) are 0.74 and above, which is only a minor shortfall from the BRE recommendation of 0.8.

Sunlight to Windows

124. All windows that face 90 degrees of due south have been tested for direct sunlight. All of the windows with a requirement for sunlight pass both the total annual sunlight hours test and the winter sunlight hours test. The proposed development therefore satisfied the BRE direct sunlight to windows requirements.

Overshadowing to Gardens and Open Spaces

125. The results confirm that all gardens or amenity areas pass the BRE overshadowing to the gardens and open spaces with the exception of garden 1 at No. 2 Bridgwater Road. The sunlight availability to garden 1 will be reduced to less than 0.8 times its former value after the proposed development, this is owing to the existing sunlight availability being already low and therefore even a small reduction in absolute terms results in a lower than normal before/after ratio.

126. In addition to the above, the BRE test is applied on 21st March since this gives the average level of overshadowing throughout the year. Overshadowing will be less during the summer months when gardens tend to be used more. Conversely, there will be more overshadowing during the winter months when gardens tend to be used less. The calculations show that on the 21st March an area of 18.39sqm would receive 2 or more hours of sunlight. This area will be larger over the summer months (April to September). Therefore, it is considered that the garden at No. 2 will experience a noticeable increase in overshadowing, it will retain a reasonable level of sunlight amenity.

Summary

127. The results demonstrate that the proposed development would have a relatively low impact on the light receivable by its neighbouring properties. Non-compliance with the BRE recommendations is limited on the daylight and sunlight tests in respect of isolated windows at the expired consented scheme of 2a Bridgwater Road and the rear garden at 2 Bridgwater Road. Taking into account the overall high compliance with BRE recommendations and the mitigating factors set out above, on balance the proposed development is considered to be acceptable in terms of daylight and sunlight.

Transport and Highways

Car Parking

128. Policy T6.1 of London Plan sets out that new residential development should not exceed the maximum parking standards set out in table 10.3. This is also reinforced within policy BT2 of Brent’s Local Plan that sets out that developments should provide parking consistent with parking standards in Appendix 4. Car parking standards are the maximum and car free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking.

129. Policy BT2 highlights that additional parking provision should not have negative impacts on existing parking, highways, other forms of movement or the environment. The removal of surplus parking spaces will be encouraged. Development will be supported where it does not:

- a) add to on-street parking demand where on-street parking spaces cannot meet existing demand such as on heavily parked streets, or otherwise harm existing on street parking conditions;
- b) require detrimental amendment to existing or proposed CPZs. In areas with CPZs access to on-street parking permits for future development occupiers other than for disabled blue badge holders will be removed or limited;
- c) create a shortfall of public car parking, operational business parking or residents’ parking;

Location	Number of beds	Maximum parking provision
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Metropolitan and Major Town Centres All areas of PTAL 5-6	All	Car free
Outer London PTAL 4	All	Up to 0.5-0.75 spaces per dwelling (lower standard are higher density/more accessible locations)

130. As this is a high-density development in an area with good public transport access, up to 0.5 car parking spaces per flat are allowed, plus a maximum of one space per 100m² for the proposed workspace (assuming use as offices).
131. Up to 16 residential and seven commercial car parking spaces would therefore be allowed and the proposed provision of just one off-street disabled parking space would accord with maximum standards, whilst also satisfying the requirement to provide a disabled parking space for 3% of units. The inclusion of an electric vehicle charging point for the parking space is welcomed.
132. However, Policy BT2 also requires that any overspill parking that is generated can be safely accommodated on-street in the area. Data for flats in the area taken from the 2021 Census suggests average car ownership of 0.6 cars/flat, which would equate to about 19 cars.
133. With only one off-street space proposed, an overspill of about 23 cars can be expected. This level of on-street parking demand exceeds the on-street parking capacity along the site frontage or in the wider area (which is already heavily parked), so would be a concern unless suitable mitigation is applied.
134. To this end, the site is located within a Growth Area and with other nearby developments having recently been approved with limited levels of off-street car parking, there is likely to be increasing demand for a Controlled Parking Zone in the area to address parking problems. (
135. If implemented, a CPZ would help to mitigate parking concerns with the proposal, as it would allow a 'car-free' agreement to be enforced by Brent Council. The Legal Agreement attached to the previous consent withdrew the right of any residents of the development to park in any future CPZ that is introduced in the area and this 'car-free' clause is again secured. A financial contribution of £16,000 is also sought from the development towards the costs of implementing a CPZ in the area (in proportion to the amount secured for the approved scheme and for other developments in the area).
136. The previous S106 Agreement also included a commitment to fund membership of nearby Car Clubs for incoming residents for two years and this is again secured to support this 'car-free' scheme.

Disabled parking

137. Disabled persons parking should be provided for new residential developments. Residential development proposals delivering ten or more units must, as a minimum:
- 1) ensure that for three per cent of dwellings, at least one designated disabled persons parking bay per dwelling is available from the outset
 - 2) demonstrate as part of the Parking Design and Management Plan, how an additional seven per cent of dwellings could be provided with one designated disabled persons parking space per dwelling in future upon request as soon as existing provision is insufficient. This should be secured at the planning stage
138. Disabled parking bays should be located to minimise the distance between disabled persons parking bays and the dwelling or the relevant block entrance or lift core, and the route should be preferably level or where this is not possible, should be gently sloping (1:60-1:20) on a suitable firm ground surface.
139. A single car parking space has been provided on the site, accessible via Bridgehill Close which is in line with the London Plan's maximum standards.

EVCP

140. Policy T6 of London Plan highlights that all residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20 per cent of spaces should have active charging

facilities, with passive provision for all remaining spaces. Policy BT1 of Brent’s Local Plan seeks to increase coverage of Electric Vehicle charging points across the borough. A condition will be attached to any subsequent consent to ensure this is complied with.

Cycle Parking

141. Policy T5 of London Plan sets out the need to secure the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking at least in accordance with the minimum standards set out in Table 10.2 and Figure 10.3, ensuring that a minimum of two short-stay and two long-stay cycle parking spaces are provided where the application of the minimum standards would result in a lower provision. This is also set out within policy BT1 of Brent’s Local Plan that highlights the need for developments to include cycle parking, in line with or exceeding London Plan standards.
142. Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.
143. Where it is not possible to provide adequate cycle parking within residential developments, boroughs must work with developers to propose alternative solutions which meet the objectives of the standards. These may include options such as providing spaces in secure, conveniently located, on-street parking facilities such as bicycle hangers.
144. The London Plan requires the provision of 1.5 secure bicycle parking spaces for every 1-bed flat and two spaces for each 2-/3-bed flat, plus at least two short-stay spaces for visitors, giving a total requirement for 58 long-stay residential spaces and two visitor space. Five long-stay spaces and two short-stay spaces are also required for the commercial floorspace.
145. An internal residential cycle store is indicated on the ground floor of the building with capacity for 68 bicycles, plus a commercial store for five bicycles, thus satisfying the long-stay requirements in a secure and sheltered location. Four further bicycle spaces are also proposed along the site frontage to satisfy the short-term visitor parking requirement in an easily accessible location.

Servicing and Refuse

146. Policy D6 of London Plan highlights the need for housing should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) and food waste as well as residual waste. This is reinforced within policy DMP1 that highlights the need for developments to provide high levels of internal and external amenity and does not unacceptably increase exposure to smells and waste.
147. Brent’s “Waste and Recycling Storage and Collection Guidance for Residential Properties” sets out the following requirements:

	Residual waste	Dry recycling	Food recycling
External	60l per bedroom	60l per bedroom	23l per household
Internal	30l per household	30l per household	5l per household

148. The guidance also highlights that collection operatives should not be required to:
- move wheeled bins of up to 240 litres more than 20 metres in total. This is the maximum distance between the point of collection and the collection vehicle.
 - move a 1,100 litre eurobin or a similar wheeled container more than 10 metres in total. This is the maximum distance between the point of collection and the waste collection vehicle.
149. Separate bin stores for the commercial and residential units are proposed towards the rear of the building fronting Bridgehill Close and the capacity shown for the residential store (six Eurobins and five wheeled bins) is sufficient to meet residential storage standards. Sliding doors are proposed to ensure Bridgehill Close does not become obstructed when the bin store is in use. The applicant has then suggested that bins will be relocated to the site frontage by a building caretaker on collection days, so

that refuse vehicles can collect the bins from Bridgewater Road rather than reversing along the narrow Bridgehill Close.

150. The proposed ground floor workspace generally needs servicing by 8m rigid vehicles (only if the entire space were used as a single storage unit might the requirement increase to a 10m rigid vehicle). An off-street servicing area with 5.3m headroom to balconies above is proposed to the rear of the site to meet this requirement, with access from Bridgehill Close. Suitable kerb splays have been indicated to allow 8m vehicles to reverse into the loading area and drive out again in a forward gear (as demonstrated with tracking), thus ensuring they do not need to reverse into or out of Bridgewater Road.
151. To help to manage deliveries, a Delivery & Servicing Plan has been submitted with the application. This estimates that the building will generate eleven van deliveries per day (ten for the workspace and one for the flats). Prior to completion of the development, a DSP co-ordinator will be appointed to manage the plan. Their duties will include ensuring the loading bay is used, encouraging all deliveries to be in FORS-accredited vehicles, minimising peak hour deliveries, implementing a delivery booking system and storing deliveries securely for residents that are not at home. Delivery activity will then be monitored, with the first survey undertaken within three months of occupation and then repeated biennially.
152. The submitted DSP and its implementation are recommended to be secured through a condition.
153. The proposed building is to be set back from the Bridgehill Close kerblines to allow a 2m wide footway to be provided along the eastern side of Bridgehill Close. This will serve the main residential entrance to the building and should be offered for adoption through a joint S38/278 Agreement under the Highways Act 1980. This agreement should also cover removal of the existing crossovers to the site and reinstatement to footway/verge, including repaving of the existing lengths of footway along the site frontage.

Impact on traffic

154. An updated Transport Statement has been submitted with the application to consider likely future trips to and from the site. Only vehicular trips have been calculated though and these are estimated to total nine movements in each peak hour (8-9am and 5-6pm). This level of vehicular traffic is not considered significant enough to cause any concern with regard to the operation of the local highway network, particularly as the existing car repair and car wash facilities on the site would be likely to generate considerably greater volumes of traffic.
155. Although other modes of transport have not been considered, the scale of the development is not considered sufficient to result in a significant impact on public transport, walking or cycling capacity in the area.
156. The submitted Transport Statement has also considered the road accident history in the vicinity of the site. This identified eight personal injury accidents over the 44-month period from January 2019-August 2022 at or in close proximity to the Bridgewater Road/Manor Farm Road mini-roundabout junction, which is relatively high. Of these, two involved cyclists and three involved motorcyclists.
157. However, with the development proposal being likely to reduce vehicular movements into and out of the site, whilst also removing two accesses from the site directly onto Bridgewater Road, the proposal is generally likely to offer minor improvements to road safety in the area, rather than any disbenefits.
158. Finally, a Framework Travel Plan was submitted with the approved scheme, but has not been included in this latest submission. However, with the development falling below the TfL threshold for a Travel Plan and being essentially 'car-free' anyway, it is not considered necessary to support the proposal.

Sustainability

159. Policy BSUI1 highlights the requirement for major developments to submit a Sustainability Statement demonstrating how sustainable design and construction methods have been used to enable the development to mitigate and adapt to climate change over its intended lifetime
160. Policy S12 of London Plan sets out the need for major developments to be net zero-carbon in terms of reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:

- 1) be lean: use less energy and manage demand during operation

2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly

3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site

4) be seen: monitor, verify and report on energy performance.

161. Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.

162. Policy SI2 sets out that a minimum on-site reduction of at least 35 per cent beyond Building

163. Regulations is required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either:

1) through a cash in lieu contribution to the borough's carbon offset fund, or

2) off-site provided that an alternative proposal is identified and delivery is certain.

164. The applicant has provided an Energy and Sustainability Statement to address major development sustainability requirements.

165. The proposed regulated development with 'Be Lean', 'Be Clean' and 'Be Green' measures incorporated within the residential part of the development is confirmed an improvement in build fabric at over 20.35% at the "Be Lean" stage and an overall improvement (BER/TER) in regulated emissions at over 71.88% above Part L 2021 standard, through the adoption of very high standards of insulation, heat pump driven heating and hot water systems and a roof mounted PV array. The scheme is estimated to require a carbon off-set payment of 4,624.00 to meet with London Plan "Zero Carbon" requirements.

BREEAM

166. Policy BSUI1 sets out the requirement for all major non-residential development to achieve a BREEAM standard of "Excellent". However, the proposal includes less than 1,000 sqm of non-residential development and in accordance with the Sustainable Environment and Development SPD, it is not considered appropriate to secure this rating.

Environmental Health

167. Policy DMP1 (g) highlights that development will be acceptable provided it does not unacceptably increase, and where possible reduce, exposure to flood risk, noise, dust, contamination, smells, waste, light, other forms of pollution and general disturbance or detrimentally impacting on air or water quality.

Noise

168. The proposed use of residential will be close to noise sources such as the railway, school etc. The applicant has submitted a Ned Johnson acoustic consultants noise assessment for the development ref 211920 dated 10/10/19. Provided the mitigation measures as per this report are implemented in terms of glazing, ventilation and protection for outdoor amenity (glass screens on balconies). In terms of vibration (due to the nearby railway line) a condition will be attached to the consent.

169. The Environmental Officer requested that the condition for any potential plant to be in accordance with BS4142:2014 requirements.

Air Quality

170. Policy BSUI2 sets out that major developments within Growth Areas and Air Quality Focus Areas will be required to be Air Quality Positive and elsewhere Air Quality Neutral. Where on site delivery of these standards cannot be met, off-site mitigation measures will be required.

171. The proposed site is within an air quality management area and therefore due to the size of the development the applicant is required to carry out an air quality impact assessment that should consider the potential emissions to the area associated with the development as well as the potential impact on

receptors to the development. The applicant has provided an air quality assessment and air quality neutral assessment undertaken by EB7Ltd.

172. Based on the results of the assessment, it is considered that redevelopment of the site would not cause a significant impact on local air quality. During the construction phase, the site has the potential to generate dust nuisance beyond the application boundary. However, through the implementation of a Dust Management Plan, the impacts will be effectively minimised and are unlikely to be significant.
173. Traffic generated by the proposed development is not expected to significantly affect local air quality as traffic movements generated are expected to be less than those associated with the existing use, as confirmed by the transport statement submitted under separate cover.
174. However, detailed dispersion modelling of traffic on the local network confirms that the project will not be subject any issues associated with poor air quality. The site has been assessed as air quality neutral with respect to transport-related emissions.
175. The proposed heating and hot water systems will be based around electrical only heat pump driven systems and therefore would have no emissions.
176. The building-related emissions has also been assessed as air quality neutral by default. This assessment methodology is accepted along with the conclusions and therefore no mitigation measures are required for the development to achieve air quality neutral criteria. It should be noted that this submission has not demonstrated that the development will achieve Air Quality Positive in line with currently policy. However, the scheme has been designed to utility Air Source Heat Pumps and includes minimal levels of car parking and it is therefore considered that reasonable measures have been taken to minimise air quality impacts associated with the development that would normally be included to ensure that a scheme is air quality positive. The scheme is considered to be acceptable in relation to air quality despite the absence of the Air Quality Positive Assessment.

Construction Noise and Dust

177. The development is within an Air Quality Management Area and located very close to other residential and commercial premises. Demolition and construction therefore has the potential to contribute to background air pollution levels and cause nuisance to neighbours. The following information is therefore recommended to minimise the impact on local air quality and protect the amenity of neighbours during construction.
178. Prior to the commencement of the development a Construction Method Statement shall be submitted to and agreed by the Local Planning Authority outlining measures that will be taken to control dust, noise and other environmental impacts of the development.

Contaminated Land

179. The site and surrounding area would be likely to have previous uses that may have caused land contamination. In the absence of an assessment submitted with this application, a contaminated land investigation and any remediation and verification works that would be necessary and would be conditioned. Environmental Health Officers subject to conditions requiring further investigation, remediation and verification of works carried out would raise no objection.

Tree Considerations

180. Policy DMP1(h) highlights the need for development proposals to retain existing blue and green infrastructure including water ways, open space, high amenity trees and landscape features and providing appropriate additions or enhancements where possible.
181. London Plan policy G7 sets out the need for development proposals to ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

182. Policy BGI2 highlights in the case of major development to make provision for the planting and retention of trees on site. Where retention is agreed to not be possible, developers shall provide new trees to achieve equivalent canopy cover or a financial contribution for off-site tree planting of equivalent canopy cover will be sought. Replacement canopy cover will be measured as total canopy area of new trees at time of planting being equal to canopy area of existing mature trees proposed for removal.
183. A tree report was submitted with the application. The submission identifies that one category C Ash Tree (T1) is to be removed, which the Arboricultural Impact Assessment considers suitable due to its low arboricultural and amenity value. Category C trees are set out as trees of low quality with a remaining life expectancy of 10 years, the tree is also sited at the periphery of the building line which would therefore impede the development and would require constant pruning of the canopy and as such, would be unlikely to be feasible to be retained. The Tree Officer raised no objection to the scheme or the loss of T1 Ash. The trees within the vicinity of the application site are of low quality and will not be affected by the proposals. As part of the extant consent, the tree identified as T1 was also included for removal owing to its low quality, this was accepted by the tree officer and set out in the planning officer report. This is therefore a material consideration, and is considered to be acceptable on balance.
184. One tree located on the western site boundary, was identified as having an impact on the proposed development. A proposed tree plan, complete with removal recommendations has been proposed for the development. The draft tree protection plan can be seen in Appendix 2 of this report. Overall the proposed development would not result in and any harm to the trees on or surrounding the application site. The proposal would result in tree planting to the front of the proposed new build with additional soft landscaping. Details of the proposed landscape strategy have been recommended as a condition.
185. Additionally, an Arboricultural Impact Assessment and Tree Protection Plan would be secured through planning conditions.

Ecology and Biodiversity

186. Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain.
187. Brindle & Green Ltd carried out the Preliminary Ecological Appraisal incorporating a Phase 1 Habitat Survey and Protected Species Assessment at 1-2 Dowling Parade. The report summarises the potential ecological constraints. The survey was carried out on the 11th January 2023.
188. The red line boundary is approximately 0.1ha in extent and comprises of residential and commercial buildings with an area of hardstanding. A strip of unmanaged scrub and young trees associated with the railway line is situated adjacent to the northern boundary of the site. The site was evaluated to support local value on a regional scale.
189. The habitats described within this report have the potential to support protected and notable species. The report concluded that a mitigation/ enhancement measures should be secured as part of any forthcoming planning consent, including:
- conduct works outside of breeding bird season which runs March-September inclusive, unless a pre works
 - check of the northern boundary vegetation should be conducted by an ecologist prior to works
 - Incorporating bat and bird boxes
 - Direct lighting away from the northern boundary.
 - Enhanced landscaping including native species
 - Mitigation measures for hedgehogs, reptiles and badgers
190. Policy BGI1 (d) sets out the need for all developments to achieve a net gain in biodiversity and avoid any detrimental impact on the geodiversity of an area.
191. Biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990, for major applications made on or after 12th February 2024. Non-major developments are also required to achieve the net gain in biodiversity for applications made on or after

2nd April 2024.

192. This sets out the need (subject to some exceptions) that every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met (“the biodiversity gain condition”). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits.
193. The application was submitted in advance of the statutory 10% BNG requirement, however, London Plan policy requires a net gain (with the amount not specified). The site as existing is in use as a car repairs site, and as such is predominantly hardstanding with buildings and canopies restricting any ecology on site. The proposal demonstrates an uplift through the provision of two street trees and additional landscaping at the upper floor levels which provide biodiversity enhancements. As such, while it has not been demonstrated that there will be a net gain in biodiversity, it is considered that the enhancements will achieve an improvement on site to the existing. The landscaping condition will require details to be provided which demonstrate that the net gain will be achieved.
194. There is a wildlife corridor situated at the rear along the railway lines, however, the proposal through the replacement of the predominantly hardstanding site will improve and further enhance green spaces and biodiversity within the site, supporting the wildlife corridor
195. Policy G5 highlights the need for an urban greening factor score of 0.4 to be achieved on predominantly residential developments, and a target score of 0.3 for predominantly commercial development (excluding B2 and B8 uses). The UGF score has been achieved, meeting the 0.4 score which is welcomed.

Flood Risk and Drainage Considerations

196. London Plan policies SI12 and SI13 require the consideration of the effects of development on flood risk and sustainable drainage respectively while Policies BSUI3, and BSUI4 confirms the Councils approach. The site is situated in Flood Zone 1, which means it has a low probability of flooding. However, to ensure that the development does not negatively affect the area and its flooding the scheme has provided further details of the sustainable drainage within the site.

Sustainable Drainage

197. London Plan Policy SI13 and Local Plan Policy BSUI4 requires development to utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so. They also require proposals to achieve greenfield run-off rates and adequately manage surface water run-off. London Plan policy SI13 further sets out a drainage hierarchy to ensure that run-off water is managed as close to its source as possible and gives preference to green over grey features
198. The proposal has been assessed against the London Plan's drainage hierarchy:
- 1) rainwater use as a resource (for example rainwater harvesting, blue roofs for irrigation) - due to the site's spatial constraints and in order to meet the four pillar of SuDS, green roofs are proposed within the communal roof areas.
 - 2) rainwater infiltration to ground at or close to source - the site is situated on the London Clay Formation with no superficial deposits therefore, infiltration is considered unviable.
 - 3) rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens) - green roofs are proposed.
 - 4) rainwater discharge direct to a watercourse (unless not appropriate) - there is no water course within the vicinity of the site.
 - 5) controlled rainwater discharge to a surface water sewer or drain - proposed to outfall to a surface water sewer.
 - 6) controlled rainwater discharge to a combined sewer. - proposed to outfall to a surface water sewer.

199. Proposals that would fail to make adequate provision for the control and reduction of surface water run-off will be refused.
200. Thames Water were consulted during the course of the application and raised no objections to the development. A Piling Method Statement was requested via a planning condition. A flood risk report was submitted with the application and clarifies that the site is located within Flood Zone 1. The findings of this report demonstrates that the proposed development will not increase surface water flows or increase flood risk at the site or elsewhere. This proposed development will greatly reduce the surface water run off leaving the site, and therefore reduce flood risk at the site and elsewhere.
201. All hard standing areas will be formed of porous surfacing. The surface water run off from the sloped hard standing areas will be caught by slot drains. The overflows from the roof areas and sloped hard standing areas will then be conveyed in to an attenuation tank which will restrict the flow leaving the site. Following the development at this site, the peak flow rate of surface water will be reduced from 26.5 l/s for a 1 in 1 year storm event to 1.951 l/s, and from 84.0 l/s for a 1 in 100 year storm event, also to 1.951 l/s which is the existing site's greenfield rate in accordance with the London Plan.

Water consumption

202. Policy BSUI4 highlights the need to meet the target for mains water consumption of 105 litres or less per person per day. A condition will be added.

Fire Safety

203. London Plan Policy D12 requires all new development to achieve high standards of fire safety, and major developments are required to submit a Fire Statement outlining compliance with the measures required under Policy D12(B).
204. A fire statement was submitted in accordance with this policy, and sets out details of construction, means of warning and escape, features to reduce the risk to life, access for fire service personnel, equipment and appliances, and the impact of potential future modifications. Fire evacuation lifts and refuge points would be provided for disabled residents. The statement is considered to satisfy the requirements of Policy D12.
205. The proposal would be considered as a "relevant" building for the purposes of consulting the Health and Safety Executive (HSE). As such, the HSE have been consulted as part of this application.
206. Concerns were initially raised with regard to the stair core and its connection to ancillary floorspace, including the bicycle storage area where there may be a number of batteries stored which may pose a fire risk. Further changes were requested throughout the consultation process, which separated the fire escape core from areas which posed an increased fire risk. These have since been reviewed by the HSE who have confirmed that they are content with the fire safety design as set out within the description of development following the amendments made.

Impacts on reception of TV and radio services

207. Policy D4 of the London Plan requires buildings and their construction to not interfere with telecommunications. A survey of the predicted impacts of the development on the TV and radio reception of neighbouring properties is also required, due to the height and scale of the development, including FM radio and digital terrestrial and satellite television, together with any mitigation measures recommended. This will be secured within the Section 106 Agreement.

Equalities

208. In line with the Public Sector Equality Duty, the Council must have due regard to the need to eliminate discrimination and advance equality of opportunity, as set out in section 149 of the Equality Act 2010. In making this recommendation, regard has been given to the Public Sector Equality Duty and the relevant protected characteristics (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation).

Conclusion

209. Having regard to all of the above and the extant consent at this site, it is considered that on balance the proposal would contribute to increasing London's supply of housing, having regard to Policies GG2, D3,

H1, H4 and H6 of The London Plan, Policies BH1 and BH2 of the Local Plan, and with guidance contained within the National Planning Policy Framework. It is acknowledged there is a shortfall in the number of 3-bedroom family homes and a lack of on-site affordable housing, however, through the submission of the robust financial viability appraisal the contribution provided has been demonstrated as the maximum viable contribution.

210. Also, owing to its due to its siting the development would not unduly impact on the amenities of the future occupiers of nearby properties in terms of loss of light, outlook, privacy, overlooking, and overshadowing and its internal and external design, is considered to provide a high-quality level of accommodation for future occupiers, having regard to Policies D4, D5, D6, D7 of the London Plan, Policies DMP1, BD1 and BH13 of the Local Plan, and with guidance contained within the National Planning Policy Framework and Brent Design Guide SPD1.

DRAFT DECISION NOTICE



Brent

DRAFT NOTICE

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

DECISION NOTICE – APPROVAL

Application No: 23/0176

To: Mr Gunne-Jones
Planning & Development Associates Ltd
Suite 155
155 Minories
City of London
EC3N 1AD

I refer to your application dated **18/01/2023** proposing the following:

Partial demolition of the HNS Autos building and other associated buildings on site and erection of new building comprising residential units and commercial space at ground floor level, cycle parking spaces, blue badge parking, amenity space and landscaping.

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

at **All Units at Dowlings Parade, HNS Autos and Delta Hand Car Wash, Bridgewater Road, Wembley, HA0 1AJ**

The Council of the London Borough of Brent, the Local Planning Authority, hereby **GRANT** permission for the reasons and subject to the conditions set out on the attached Schedule B.

Date: 03/09/2024

Signature:

David Glover
Head of Planning and Development Services

Notes

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

DnStdG

SUMMARY OF REASONS FOR APPROVAL

- 1 The proposed development is in general accordance with policies contained in the:-
London Plan 2021
Brent Local Plan 2019-2041

- 1 The development to which this permission relates must be begun not later than the expiration of three years beginning on the date of this permission.

Reason: To conform with the requirements of Section 91 of the Town and Country Planning Act 1990.

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

252_P.001: Proposed Site Plan
252_P.002 B: Proposed Ground Floor Plan
252_P.003 A: Proposed First Floor Plan
252_P.004 A: Proposed Second Floor Plan
252_P.005 A: Proposed Third Floor Plan
252_P.006 A: Proposed Fourth Floor Plan
252_P.007 A: Proposed Fifth & Sixth Floor Plans
252_P.008 A: Proposed Roof Floor Plan
252_P.009: Proposed Section A-A
252_P.010: Proposed Southwest Elevation
252_P.011: Proposed Northwest Elevation
252_P.012: Proposed Southeast Elevation
252_P.013: Proposed Northeast Elevation
252_P.014: Rendered Front Elevation
252_P.015: Rendered Rear Elevation

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

- 3 The non-residential floorspace hereby approved shall not be used other than for purposes within (Use Class E(g)(ii) or E(g)(iii) and shall not be used for any other purpose, notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 (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 (or any order revoking and re-enacting that Order with or without modification) unless planning permission has been granted for the alternative use by the Local Planning Authority.

Reason: To ensure the retention of industrial floorspace on the site.

- 4 The scheme hereby approved shall contain 32 residential units as detailed in the drawings hereby approved, unless other agreed in writing by the Local Planning Authority.

Reason: In the interests of proper planning.

- 5 The residential development hereby approved shall be designed so that mains water consumption does not exceed a target of 105 litres or less per person per day, using a fittings-based approach to determine the water consumption of the development in accordance with requirement G2 of Schedule 1 to the Building Regulations 2010.

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

compliance with policy SI5 of London Plan 2021 and Brent Policy BSUI4.

- 6 The proposed development hereby approved shall be built in accordance with mitigation measures set out within the Ecological Assessment prepared by Brindle and Green.

Reason: In the proper interests of planning and ensure no harm to wildlife and plants within the nearby Wildlife Corridor.

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

Reason: To protect local amenity and air quality in accordance with Brent Policy DMP1 and London Plan policies 5.3 and 7.14.

- 8 The development hereby approved shall not be occupied unless units 6, 7 and 12 have be designed to comply with M4(3) 'wheelchair accessible homes' standards, and the remainder of the homes have be designed to comply with Building Regulations M4(2) 'accessible and adaptable homes' standards, unless alternative details have been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the provision of accessible homes, in accordance with policy D7 of London Plan 2021.

- 9 The approved disabled car parking space together with electric vehicle charging point, cycle storage facilities and bin storage facilities shall be installed and made available for use prior to first occupation of the development hereby approved and thereafter retained and maintained for the life of the development and not used other than for purposes ancillary to the occupation of the development hereby approved.

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

- 10 The proposed development hereby approved shall be built in accordance with the recommendations set out within the Flood Risk Assessment and SUDS Report prepared by Nimbus.

Reason: To ensure appropriate water management arrangements are incorporated as part of the development.

- 11 A communal television aerial and satellite dish system shall be provided, linking to all residential units unless otherwise agreed in writing by the local planning authority.

Reason: In the interests of the visual appearance of the development in particular and the locality in general.

- 12 The proposed development hereby approved shall be built in accordance with the recommendations set out within the Noise Assessment prepared by Ned Johnson acoustic consultants.

Reason: To ensure an acceptable standard of accommodation for future occupiers.

- 13 Prior to the commencement of the development a Construction Method Statement shall be

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

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

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

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

- 14 Prior to commencement of development, a Construction Logistics Plan, identifying anticipated construction traffic movements and setting out measures to manage and minimise the construction traffic impacts arising from the development, taking into account other construction projects in the vicinity, shall be submitted to and approved in writing by the Local Planning Authority.

The development shall thereafter be carried out in full accordance with the approved Construction Logistics Plan.

Reason: To ensure construction traffic impacts are effectively managed throughout the construction process.

Reason for pre-commencement condition: Construction traffic impacts can arise at any time from the commencement of works, and adequate controls need to be in place from this time.

- 15 Prior to commencement of development, details of the following shall be submitted to and approved in writing by the Local Planning Authority (in consultation with London Underground):

A detailed design and method statements for each state of the development for all of the demolition, foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:

- provide details on all structures
- written approval from London Underground will be required prior to commencement of any works
- provide drainage strategy
- provide details on the use of tall plant/scaffolding
- accommodate the location of the existing London Underground structures
- demonstrate access to elevations of the building adjacent to the property boundary with London Underground can be undertaken without recourse to entering our land
- demonstrate that there will at no time be any potential security risk to our railway, property or structures

- accommodate ground movement arising from the construction thereof
- and mitigate the effects of noise and vibration arising from the adjoining operations within the structures and tunnels

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2021 and Land for Industry and Transport Supplementary Planning Guidance 2012.

- 16 Prior to the commencement of the development hereby approved (including demolition and all preparatory work), a scheme for the protection of retained trees in accordance with BS5837: 2012 including a Tree Protection Plan (TPP, at para. 5.5 BS 5837) and an Arboricultural Method Statement (AMS, at para. 6.1 BS 5837) shall be submitted to and approved in writing by the local planning authority.

Specific issues to be dealt with in the TPP and AMS:

- a) Location and installation of services/utilities/drainage
- b) Methods of demolition within the root protection area (RPA as defined in BS 5837: 2012) of the retained trees.
- c) Details of construction within the RPA that may impact on the retained trees
- d) A full specification for the installation of boundary treatment works
- e) A full specification for the construction of any roads, parking areas and driveways to be constructed using a no-dig specification including the extent. Details shall include relevant sections through them.
- f) Detailed levels and cross sections to show that the raised levels or surfacing, where the installation of no-dig surfacing within the RPA is proposed, demonstrating that they can be accommodated where they meet with any adjacent building damp proof courses.
- g) A specification for protective fencing to safeguard trees during both demolition and construction phases and a plan indicating the alignment of the protective fencing.
- h) A specification for scaffolding and ground protection within tree protection zones.
- i) Tree protection during construction indicated on a TPP and construction activities in this area clearly identified as prohibited in this area.
- j) Details of site access, temporary parking, on site welfare facilities, loading, unloading and storage of equipment, materials, fuels and waste as well as concrete mixing and use of fires.
- k) Boundary treatments within the RPA
- l) Methodology and detailed assessment of root pruning
- m) Arboricultural supervision and inspection by a suitably qualified tree specialist.
- n) Reporting of inspection and supervision.
- o) Methods to improve the rooting environment for retained trees and landscaping

The development thereafter shall be implemented in strict accordance with the approved details.

Reason: Required prior to commencement of development to satisfy the Local Planning Authority that the trees to be retained will not be damaged during demolition or construction and to protect and enhance the appearance and character of the site and locality, in accordance with DMP1 and BGI 2.

Reason for pre-commencement condition: Impacts arising from the construction process occur as soon as development commences and adequate controls need to be in place from this time.

- 17 No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage

infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure.

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

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

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

- 19 Prior to commencement of development (excluding any demolition, site clearance and the laying of foundations), the following shall be submitted to and approved in writing by the Local Planning Authority:

(a) Details of materials for all external surfaces of the building including sample boards

(b) Details of the proposed security gates on the ground floor

(c) Details of screening to be installed on all proposed balconies

(d) Details of screening linked to the proposed roof terrace areas

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

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

- 20 Prior to commencement of development (excluding any demolition, site clearance and the laying of foundations), overheating analysis and appropriate mitigations measures shall be submitted to and approved in writing by the Local Planning Authority. The approved details shall be incorporated as part of the lifetime on the development unless agreed in writing with 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.

- 21 Within 6 months of commencement of works further details of soft and hard landscaping shall be submitted to and approved in writing by the local planning authority:

(a) hard surfacing, any external furniture and play equipment, and boundary treatments throughout the site, including samples which shall be made available for viewing on site or in another location as agreed.

(b) details of soft landscaping (including species, location and densities) together with design of

tree pits for trees planted within the site.

(c) details of any external CCTV.

(d) details of proposed external lighting design to ensure that all external areas are adequately lit in hours of darkness, including a light spillage plan taken into consideration the wildlife corridor.

(e) arrangements for maintenance of trees and other planted species.

(f) details demonstrating that the development will achieve a net gain in biodiversity.

The hard and soft landscape works shall be carried out in full accordance with the as approved details prior to the use of the building hereby approved, unless alternative timescales have been submitted to and approved to be agreed in writing by the Local Planning Authority and the works shall thereafter be carried out in accordance with the approved timescales.

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

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

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

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

- 24 Prior to first occupation of the proposed workspace, a Delivery and Servicing Plan shall be submitted to and approved in writing by the Local Planning Authority and the approved plan shall thereafter be implemented from first occupation of the development. The Delivery and Servicing Plan shall have regard to TfL guidance regarding Delivery and Servicing Plans.

Reason: To ensure the on-going sustainability of the development, in accordance with London Plan Policy D4. In the interest of the free and safe flow of traffic on the highway network.

- 25 The residential development must be designed to ensure the following vibration levels stated in BS6472:2008 Evaluation of human exposure to vibration in buildings (1Hz to 80 Hz) are not exceeded

- Residential building (16 hr day) vibration dose values of 0.2 to 0.4 (low probability of adverse comment m/l 1.75)
- Residential building (8hr day) vibration dose values of 0.1 to 0.2 (low probability of adverse comment m/l 1.75)

Prior to first occupation of any of the residential homes hereby approved, a test shall be carried out with the results submitted to and approved in writing to the Local Planning Authority to show that the required internal noise levels have been met.

Reason: To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess vibration from transportation sources.

INFORMATIVES

- 1 The applicant is advised that this development is liable to pay the Community Infrastructure Levy; a Liability Notice will be sent to all known contacts including the applicant and the agent. Before you commence any works please read the Liability Notice and comply with its contents as otherwise you may be subjected to penalty charges. Further information including eligibility for relief and links to the relevant forms and to the Government's CIL guidance, can be found on the Brent website at www.brent.gov.uk/CIL.
- 2 The applicant is advised to contact London Underground Infrastructure Protection in advance of preparation of final design and associated method statements, in particular with regard to: demolition; drainage; excavation; construction methods; tall plant and scaffolding.
- 3 The provisions of The Party Wall etc. Act 1996 may be applicable and relates to work on an existing wall shared with another property; building on the boundary with a neighbouring property; or excavating near a neighbouring building. An explanatory booklet setting out your obligations can be obtained from the Communities and Local Government website www.communities.gov.uk
- 4 Given the age of the building to be demolished it is possible that asbestos may be present. The applicant should be reminded of their duties under the Control of Asbestos Regulations and must ensure that a qualified asbestos contractor is employed to remove all asbestos and asbestos-containing materials and arrange for the appropriate disposal of such materials.
- 5 The quality of imported soil must be verified by means of in-situ soil sampling and analysis. We do not accept soil quality certificates from the soil supplier as proof of soil quality.
- 6 Brent Council supports the payment of the London Living Wage to all employees within the Borough. The developer, constructor and end occupiers of the building are strongly encouraged to pay the London Living Wage to all employees associated with the construction and end use of development.
- 7 The Council recommends that the maximum standards for fire safety are achieved within the development.

Any person wishing to inspect the above papers should contact Nicola Blake, Planning and Regeneration, Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ, Tel. No. 020 8937 5149