COMMITTEE REPORT

Planning Committee on 12 March, 2025
Item No 04
Case Number **24/0410**

SITE INFORMATION

RECEIVED	**13 February, 2024**
WARD	**Alperton**
PLANNING AREA	**Brent Connects Wembley**
LOCATION	**Atlip Centre and 2 Atlip Road, Wembley, HA0 4LU**
PROPOSAL	Comprehensive mixed-use redevelopment of the site including the demolition of the existing buildings and construction of seven new buildings comprising residential dwellings (Use Class C3), residential co-living homes (Use Class Sui Generis), commercial and community uses (Class E (excluding sub-use B), F2 and sui generis – creative industries), new public square and other public realm improvements, car parking, cycle parking, internal and external private and communal amenity space, play space, access and servicing arrangements, plant, substations, and other associated works incidental to the proposed development. (This application is accompanied by an Environmental Statement) *Further explanation (not forming part of the formal description of development set out above):* The proposed development includes the construction of seven new buildings to provide 464 residential dwellings (Use Class C3) and 421 co-living homes (Use Class sui generis), comprising heights of between 2, 8, 10, 20, 23 and 29 storeys (up to 123.66 AODm), as well as a single storey workspace building. The development proposes 237sqm (GIA) of commercial floorspace (Class E – excluding sub-use B), 505sqm (GIA) of community and flexible workspace floorspace (Class F2, Class E (excluding sub-use B) and Sui Generis – creative industries), and 124sqm of flexible workspace (Use Class E(g) and Sui Generis – creative industries).
PLAN NO'S	See condition 2.
LINK TO DOCUMENTS ASSOCIATED WITH THIS PLANNING APPLICATION	**When viewing this on an Electronic Device** **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_167877 **When viewing this as an Hard Copy** **Please use the following steps** 1. Please go to pa.brent.gov.uk 2. Select Planning and conduct a search tying "24/0410" (i.e. Case Reference) into the search Box 3. Click on "View Documents" tab

RECOMMENDATIONS

That the Committee resolve to GRANT planning permission subject to the application's referral to the Mayor of London (stage 2 referral) and the prior completion of a legal agreement to secure the following planning obligations:

1. Payment of the Council's legal and other professional costs in (a) preparing and completing the agreement and (b) monitoring and enforcing its performance

2. Notification of material start 28 days prior to commencement.

3. *Training and employment of Brent residents* - Prior to a material start:

   a. to inform Brent Works in writing of the projected number of construction jobs and training opportunities and provide a copy of the Schedule of Works;
   b. to prepare and submit for the Council's approval an Employment Training Plan for the provision of training, skills and employment initiatives for residents of the Borough relating to the construction phase and operational phase of the Development
   c. financial contribution (estimated to be £211,475; calculated in accordance with Brent's Planning Obligations SPD) to Brent Works for job brokerage services.

4. Energy assessment

   Prior to a material start submission and approval of a detailed design stage energy assessment. Initial carbon offset payment (estimated to be £444, 609 / £95 per tonne) to be paid prior to material start if zero-carbon target not achieved on site.
   a.Post-construction energy assessment. Final carbon offset payment (calculated at £95 per tonne) upon completion of development if zero-carbon target not achieved on site.
   b.'Be seen' energy performance monitoring and reporting

   5.*Travel Plan* – Submission, approval and implementation of full Travel Plan (based upon the submitted framework Travel Plan).

   6. Submission, approval and implementation upon commencement of a Waste Management Plan for building A, including commitment to fund and arrange independent waste collections from the site. Collections for this building (including all co-living units) must be entirely privately funded and arranged for the lifetime of the development unless an alternative plan showing a revised layout is submitted and agreed with the LPA which meets Veolia's requirements in respect of carrying distances.

7. Car free restriction; parking permit restriction to be applied to all new residential units, save for disabled badge holders.

8. *Financial contributions for Transport for London (to be paid to the Council for them to pass to TfL accordingly):* (i) for improvements to public transport bus services (£190, 000), and (ii) separate contribution towards step free access at Alperton Station (£600, 000) to be paid in full not less than 6 months prior to the Occupation of the development.

9. Parks / amenity / play space contribution: To offset the shortfall in on site play space (Local Play space & Neighbourhood Play space), secure a contribution of £143,000 for Local Play space (ages 5-11) and £89,200 for Neighbourhood Play space (ages 12+). Contribution to be spent on improvements to nearby open spaces which may include improvements to the open spaces themselves, the play facilities within these open spaces and/or improvements to the routes to these spaces from the application site.

10. Healthy Streets / Active travel improvements contribution – £100, 000 to support Healthy Streets improvements in the vicinity of the site as recommended in the Healthy Streets Assessment and / or at the junction of Ealing Road / Mount Pleasant

11. Provision of two Car Club parking spaces on Atlip Road and promotion of a Car Club in partnership with a recognised Car Club operator, to include provision of three years free membership for each

household.

12. Secure provision of 421no. large-scale purpose built shared living (co-living) units. Also, to secure the submission, approval and implementation of an Operational Management Plan for building A, prior to first occupation of the building, meeting all the requirements of policy H16 of the London Plan 2021. (N.B. the final management plan to include, minimum tenancy terms and commitment to single management).

13. TV and radio reception impact assessment: Undertaking to carry out any mitigation works identified within the submitted baseline assessment and agreed.

14. *Affordable Housing*; Secure provision of a minimum 88no. affordable housing units in buildings C1 and C2 comprised of (60 London Affordable Rent and 28 Shared Ownership units unless an alternative housing mix is subsequently agreed), and to secure 100% nomination rights in relation to the London Affordable Rented homes.

15. Suitably timed viability reviews.

16. Submission, approval and implementation of a Management and Maintenance Plan for Atlip Road, including all areas of public realm and publicly accessible open space, with public access to these spaces to be provided and maintained thereafter.

17. Community Centre: Provide the community centre building (building D1) to shell, core and utilities prior to first occupation of the last residential building, unless an alternative timeframe is subsequently agreed. Submission, approval and implementation of a Community Use and Access Agreement and Operational Management Plan, to be agreed prior to use of the building and implemented thereafter.

18. Biodiversity Net Gain: related obligations, including Habitat Management and Maintenance Plan / Survey and Monitoring Report for Net Gain and monitoring fee for the 30 year period.

19. Indexation of contributions in line with inflation from the date of committee resolution until date of payment.

20. The proposed development is a phased development (such phasing to be secured by way of condition), and accordingly, terms in the corresponding s106 agreement will be drafted to apply to the relevant specific phases/buidings (wherever possible) to align with such.

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

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

Conditions

Compliance

1. Three year rule
2. Approved drawings and documents
3. Restrict number of C3 dwellings
4. Number of wheelchair adaptable and wheelchair user C3 dwellings
5. No permitted change from C3 to C4
6. Restrict number of co-living homes
7. Number of wheelchair adaptable co-living homes
8. Quantum of non-residential floorspace
9. Provision of cycle and refuse storage
10. Water consumption limit
11. NRMM
12. Odour control and/or extract ventilation systems
13. Non-residential glazing
14. Noise levels from any plant installed
15. Equitable access to amenity space

Pre-demolition

16. Considerate Constructors Scheme
17. Phasing (CIL)
18. Phasing plan
19. Demolition Logistics Plan
20. TfL Infrastructure Protection
21. Replacement sub-station strategy
22. Bat roosting survey

Pre-commencement

23. Flood Risk and Drainage
24. Noise levels (sub-station)
25. Site investigation (contaminated ground)
26. Remediation report (contaminated ground)
27. Construction Logistics Plan
28. Construction Method Statement
29. Wind mitigation measures
30. Fire Safety
31. 'Be seen' energy performance indicators
32. BREAAM pre-assessment
33. Future connection to district heating network
34. Landscaping and public realm details
35. Obscure glazing window strategy
36. Acoustic glazing strategy
37. Sound insulation measures
38. Secure by design principles
39. SuDS
40. Glare and glint study (TfL Infrastructure Protection)
41. Highway works details
42. Meanwhile Use Strategy
43. Biodiversity CEMP

Pre-piling works

44. Piling Method Statement

Pre-superstructure works

45. Electric vehicle charging provision
46. Fibre broadband connectivity infrastructure
47. External materials
48. PV strategy
49. Hard and soft landscaping (TfL Infrastructure Protection)

Pre-occupation

50. Air quality recommendations
51. Communal TV and satellite dish system
52. Overheating risk (implement mitigation measures)
53. Noise and vibration (implement mitigation measures)
54. Travel Plan(s)
55. Delivery and Servicing Plan
56. Car Park Management Plan
57. Operational Waste Management Plan
58. Building Maintenance Strategy
59. Noise levels from plant and ancillary equipment
60. Signage Strategy
61. Wildlife and nesting features
62. Statement of conformity (for biodiversity/ecological/habitable features)

Post-completion

63. Whole-life carbon
64. Circular Economy

Post-occupation

65. Post construction BRE review

Informatives as listed in the Committee Report.

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

That, 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.

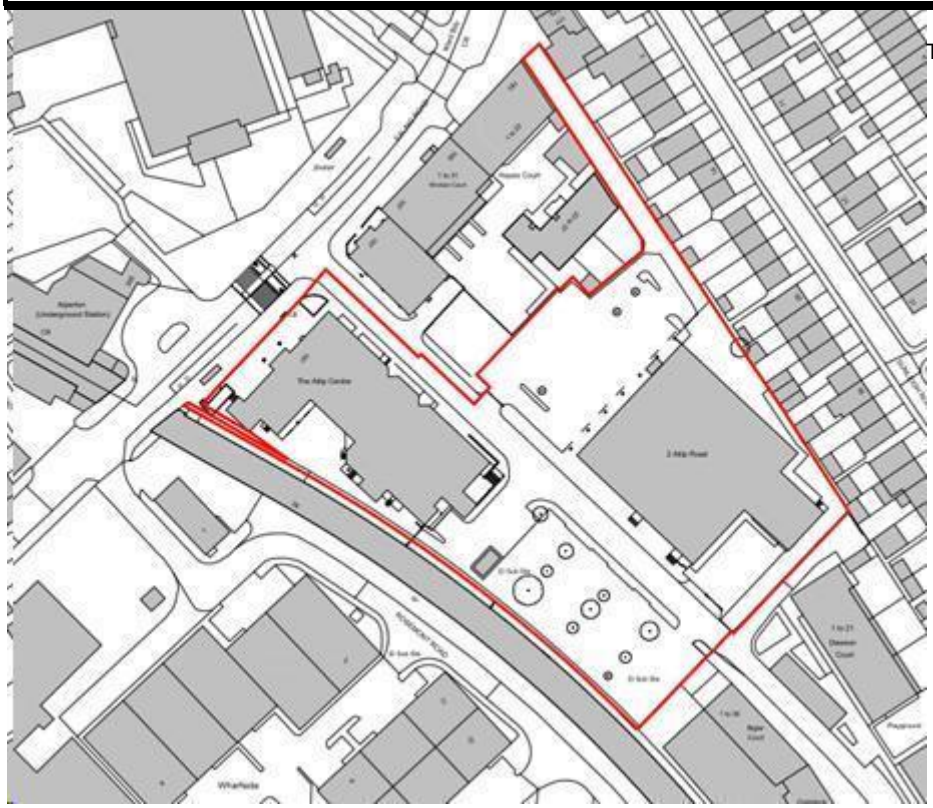
That the Committee confirms that adequate provision has been made, by the imposition of conditions, for the preservation or planting of trees as required by Section 197 of the Town and Country Planning Act 1990.

SITE MAP

Planning Committee Map

Site address: Atlip Centre and 2 Atlip Road, Wembley, HA0 4LU

This map is indicative only.



PROPOSAL IN DETAIL

The proposal is to demolish all existing buildings (Atlip Centre, 2 Atlip Road and existing substation), remove the existing car park and redevelop the sites on both sides of Atlip Road for a mix of uses, including C3 residential, co-living homes, commercial uses (Class E) and community uses (Class F), including provision of a new standalone community centre.

The proposed development is to be accommodated in seven buildings ranging in height from 2 to 29 storeys, with a single storey workspace building. The development comprises;

- up to 464 residential dwellings (Class C3), including 88 affordable homes
- up to 421 Co-living homes (Sui Generis use);
- 237sqm (GIA) of commercial floorspace (Class E – excluding sub-use B);
- 505sqm (GIA) of community and flexible workspace floorspace (Class F2, Class E (excluding sub-use B) and Sui Generis – creative industries), and;
- 124sqm of flexible workspace (Use Class E(g) and Sui Generis – creative industries)

In association with these uses it is proposed to provide a new public square and other new public realm including improvements to Atlip Road, car parking, cycle parking, internal and external private and communal amenity space, play space, access and servicing arrangements, plant, substations, and other associated works incidental to the proposed development.

EXISTING

The existing brownfield site consists of parcels of land either side of Atlip Road, extending across c.1.14 hectares. The site comprises the Atlip Centre, 2 Atlip Road, associated surface level car park, substation and Atlip Road itself. Atlip Road is unadopted, with rights of way across it which primarily facilitates vehicular access to the site and existing development to the south (including Bigler Court, Holinger Court, Dawson Court and Fairbanks Court) and the Grand Union Canal and pedestrian footbridge beyond. The site also contains a narrow strip of land that runs from Ealing Road between 183 Ealing Road and the residential curtilage of properties along Sunleigh Road.

Surrounding land uses are mixed in this location. The site is bounded by to the north-west by Ealing Road, the Church of God of Prophecy (197 Ealing Road) and Hayes Court, a residential block with ground floor commercial uses (183-189 Ealing Road).

To the north-east, the site boundary adjoins the rear gardens of terraced, two storey residential properties located along Sunleigh Road.

The south-eastern boundary adjoins the four-storey, residential blocks known as Dawson Court, and the eight-storey block known as Bigler Court.

The Piccadilly Line runs along the entirety of the site's western boundary and is raised above ground level to the equivalent of two storeys. Beyond the Underground Line to the west is the Rosemont Road Industrial Estate which is designated as Locally Significant Industrial Land (LSIL).

The site is within Alperton Growth Area, which is an area undergoing significant growth and regeneration. Directly opposite the site, the former Alperton Bus Garage site is currently being developed as a mixed-use residential lead development, including tall buildings of up to 28 storeys (ref; 20/3914). Other sites nearby, including (former) Minavil House, (former) Alperton House, and the phased developments at the Abbey Manufacturing Estate and Grand Union, have either been completed, are under construction or have planning permission, and comprise of residential lead mixed-use redevelopments.

The site is included within Local Plan Site Allocation BSWSA3, together with the neighbouring Church of God Prophecy, though the church site does not form part of this application. The site allocation requirements are covered in more detail in the 'Remarks' section of this report.

The Public Transport Access Level (PTAL) of the site ranges from PTAL 5 to 3 (north to south), which includes access to the Piccadilly Line and bus stops are available directly outside of the site including

services 79, 83, 224, 297, 483 and N83.

The site is not in a conservation area and does not contain any listed buildings. Alperton Station is situated opposite the site to the north, the Station building is locally listed.

The closest water course to the Site is the Grand Union Canal located c.80m to the south. The Environment Agency Map for Flooding shows the Site within Flood Zone 1.

AMENDMENTS SINCE SUBMISSION

Amended plans and additional / updated supporting and technical documents were received during the course of the application, summarised as follows:

- Updates to all relevant drawings to correct minor discrepancy in relation to finished floor levels.
- Design changes to balconies (building D1 only), including raising of balustrade heights, introduction of solid balcony sides and re-location of some balconies from southern elevation to the eastern (internal facing) elevation

In association with the revised balcony designs, separate Statements of Conformity have been provided in relation to Wind / microclimate and Daylight and Sunlight impacts, which update the relevant considerations on these topics in the Environmental Statement. An updated Glare Study is also provided.

The Flood Risk Assessment was revised during the applications consideration, to address comments raised by the Local Lead Flood Authority.

Due to the scale and nature of the amendments made since the application was submitted, it has not been deemed necessary for further public consultation to have been carried out. Where relevant further consultation has taken place with statutory and non-statutory consultees.

SUMMARY OF KEY ISSUES

The key planning issues for Members to consider are set out below. Objection has been received from 14 interested parties as well as an e-petition with 145 signatories, whose reasoning for objecting is set out in the 'Consultations' section. 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.

Neighbour objections: As set out in the 'Consultations' summary below, objections received relate to (but are not limited to the following); detrimental impact on local community due to over development of the area, will compromise the cultural qualities of the area, buildings proposed are too tall, visual harm caused by tall buildings, community centre should be more ambitious, loss of daylight / sunlight / outlook, loss of privacy / overlooking, overbearing impacts, negative effect on microclimate (i.e. wind conditions), development is not providing sufficient infrastructure and amenities to support further growth, loss of existing gym in the Atlip Centre, will the proposed new facilities be open to the wider public, some existing businesses on site will be forced to close, transport impacts (including to existing public transport), insufficient parking provision will lead to problematic illegal parking, result in increased waste, reduce air quality, noise pollution, increase fire risk, flood risk and impact on ecology.

Principle of development / land uses: The principle of the residential-led mixed-use redevelopment of the site is acceptable, particularly in respect of the site allocation requirements set out in policy BSWSA3 of the Local Plan. At 464 C3 dwellings and 421 co-living homes, the site would provide housing numbers significantly above the allocation's indicative capacity of 450 dwellings. This quantum would contribute significantly to borough housing needs. The proposal would make efficient use of previously developed land in a highly sustainable location. The principle of the loss of the banqueting facility and the on site commercial gym is considered to have been satisfactorily justified, whilst also recognising the negative impact re-provision of these existing uses would have on housing delivery by reducing the number of new homes proposed (including impacting negatively on affordable housing). The principle of new flexible Class E floorspace (including workspace) and new Use Class F2 floorspace (in the form of a new community centre) is considered acceptable in the context of the allocation, and these uses will contribute positively to Ealing Road and the vitality of wider local area.

Affordable housing and mix of C3 accommodation: On a site wide basis cumulatively, the application is

proposing to provide 20% affordable housing (by habitable room) equating to 88 affordable dwellings, and this is weighted towards London Affordable Rent, resulting in a policy complaint 70 / 30 tenure split for the affordable dwellings. Rather than provide an off-site payment in lieu for the co-living homes in line with London Plan policy, to be utilised for off site affordable housing provision in the Borough, the applicant has elected to draw this down in order to increase the on site affordable offer overall for the C3 dwellings. The proposed amount of affordable housing has been the subject of rigorous viability testing, and all parties conclude that the development would result in a significant viability deficit, and therefore agree that cumulatively the proposed offer of 20% affordable housing across the C3 and co-living floorspace represents the maximum reasonable level of affordable housing the scheme can viably deliver at this time.

The proposal includes 93 (20%) homes with at least three bedrooms, which is acknowledged to be below the Local Plan BH6 policy target of 1 in 4 new homes. However, it has been demonstrated that an increased level would negatively impact the already challenging scheme viability, and the proposals do heavily weight the family provision within the low cost rented tenure, which the Borough is in particularly acute need of. This, as well the benefits from providing a significant number of new homes are considered to outweigh the shortfall in family homes on a site-wide basis.

Urban Design: layout, height, scale, massing and appearance: The site is located within a Tall Building Zone and is in the centre of Alperton Growth Area, where a number of tall buildings either currently exist, are under construction or have recently been approved. Proposed buildings would be up to 29 storeys in height, which is equally comparable to the tallest buildings currently being constructed on the former Alperton Bus Depot site opposite. The proposed layout and arrangement of height and massing around the site is well considered, and this is the result of a lengthy pre-application process (including design review) that tested various alternatives. The tallest buildings proposed are located closest to the railway edge, stepping down in height significantly towards the eastern edge to respond to the more sensitive Sunleigh Road relationship, which is a more suburban low-rise context. A comprehensive townscape and visual impact assessment has been submitted in support of the application, which demonstrates that the buildings would strengthen the emerging tall building cluster in this location, would be a positive addition to the emerging context and that they would relate well to the varied and undulating skyline that is both established and emerging in the area. No harm is identified to be caused to any heritage assets or protected views, and the siting, separation, massing, articulation and materiality of the buildings would enable these to read as distinct blocks. Active frontages have been maximised at ground floor across the site, and new landscaping, open space and public realm would help to create a successful new place. The detailed design of the buildings is considered to be well considered and responsive to the site constraints and would be of high quality.

Heritage effects: Following consideration of the submitted built heritage, townscape and visual impact assessment, it is concluded that the proposed development has no effect on any designated heritage assets. Alperton Station building opposite the site is a locally listed building (non-designated heritage asset), and potential effects have been considered, and is concluded (having taken into account the emerging local context) that no harm is caused by the proposals on the heritage significance of the Station.

Fire safety: The proposal has been reviewed by the Health & Safety Executive (HSE) under the Gateway One process. The HSE have confirmed they are ‘content’ and have no objection on layout or land use matters. Fire safety will also be considered in further detail at Building Regulations stage.

Quality of residential accommodation: The residential accommodation proposed is of sufficient high quality, meeting the particular needs and requirements of future occupiers, including adequate provision of accessible homes. The accommodation would have good outlook and light, with only a low proportion of single aspect homes included. The buildings achieve good levels of separation distances between them, and in places this is well in excess of the minimum 18m typically sought in new development. The overall amount and type of external private and communal amenity space does not fully meet Brent’s target requirements as set out within policy BH13 (20sqm & 50 sqm depending on the size and type of dwelling). However, the provision of amenity space on site has been reasonably maximised for location and quantum of development such as this and what is proposed is of sufficient high quality and provides a good variety of different types of external communal spaces (including new publicly accessible open space) as well as on site play for public access and future residents. A financial contribution is to be secured also for the enhancement of existing open space / play provision in the locality, which will be a public benefit.

Relationship with / impact on amenity of surrounding residential properties and relationship with wider Site Allocation: Impacts on daylight, sunlight and overshadowing to nearby residential developments have been robustly analysed and captured within the submitted assessment. It is recognised that some existing nearby residential development would experience noticeable impacts, and there would be some shortfalls against BRE guidelines. However, it should be noted that BRE guidelines largely relate to a

suburban context and in order to achieve the level of affordable housing, meet other site allocation requirements and deliver other benefits proposed a certain quantum of development on site is necessary in viability terms. Negative effects such as those set out within the relevant sections of this report are considered inevitable when seeking to develop at high density in a way that makes efficient use of the land, within a growth area and where there is a dense pattern of development already established and still emerging in the locality. Effects are to be expected in the locality particularly where there is an existing site (part of which is undeveloped) that comprises buildings notably lower in scale than other nearby sites within the same growth area, and which is subject to a site allocation policy that seeks to encourage further growth. Any harmful effects will be balanced against the planning benefits overall. The building design / envelope, relationship to sensitive boundaries and internal layouts respond to the site constraints, helping to mitigate any harmful effects owing to proximity of buildings to site boundaries.

Sustainability, energy, whole-life carbon and circular economy: The development is estimated to exceed the target 35% carbon reduction in regulated CO2 emissions, measured against 2021 Building Regulations, which would be derived from energy efficiency / demand reduction measures, as well as through renewable energy technologies proposed in the form of air source heat pumps and solar PV panels. A BREEAM 'Excellent' rating is being targeted for all non-residential elements (including building A which contains the co-living units). A contribution to Brent's carbon-offsetting fund would be secured through the s106 agreement, to offset residual emissions to net zero. In addition, Whole Life Carbon Cycle and Circular Economy Statement commitments, which are considered satisfactory by the GLA, would be secured by condition.

Impacts on microclimate: The proposal would result in wind conditions within and around the site that would be suitable for the intended use or consistent with baseline conditions, subject to recommended mitigation measures being implemented. A survey of predicted impacts on TV and radio reception to neighbouring properties (including any mitigation measures necessary) has been provided, and the recommended mitigations would be secured through the s106 agreement.

Environmental health considerations: The development would be air quality positive. Noise and contaminated land impacts have been assessed and Brent's Environmental Health officers consider these to be acceptable for future residential occupiers (and existing neighbouring) subject to certain planning conditions. A detailed Construction Method Statement would be secured as a pre-commencement condition further setting out how environmental impacts, such as dust and noise, will be managed, reduced and mitigated during demolition and construction phases.

Flood risk and drainage: A detailed Flood Risk Assessment and Drainage Strategy (including detailed SuDS strategy) have been submitted to assess the risks. The site is within Flood Zone 1 (low risk of fluvial flooding). Some parts of the site are categorised as 3a for surface water flooding, and this risk has been addressed through the drainage / SuDS strategies, with mitigation measures proposed. The proposed strategy, including SuDS features show that post development there would be a 96% betterment in surface water runoff rates which is an improvement from a flood risk perspective. No objections are raised by the Local Lead Flood Authority, Environment Agency, or Thames Water to the proposed strategies. Conditions are to be secured requiring further details, including for the drainage / SuDS measures and long-term maintenance of these.

Landscape, trees, biodiversity and urban greening: A comprehensive tree planting strategy is proposed that demonstrates a significant net increase in trees across the site, with c.160 new trees to be planted. There are only 12 trees on site currently, all relatively small in size, and none are Cat A quality trees, so this will result in a significant uplift. It has been demonstrated the proposal would result in a measurable biodiversity net gain (+10%) as a result of the development and once the landscaping proposals have been implemented. No negative ecological effects are considered likely either, having taken into account of the adjacent wildlife corridor. The Urban Greening Factor of 0.40 indicated is in accordance with the policy target. Overall, the development will lead to positive biodiversity and green infrastructure outcomes when compared to the current baseline conditions.

Transport considerations and relationship to TfL infrastructure: The site is in a highly sustainable location (PTAL Rating 5 - 3) and the development would be car-free (expect for blue badge parking), with adequate provision made for cycle parking in line with London Plan standards and sustainable transport further encouraged through the submission and monitoring of Travel Plan(s), secured under the s106 agreement and a commitment to providing on site Car Club spaces. Increased pedestrian permeability will be achieved as a result of the sites redevelopment, and additionally a Healthy Streets contribution (£100, 000) is committed to which will support further pedestrian safety improvements in the vicinity. The layout accommodates appropriate servicing and loading bays, including along Atlip Road. The deliveries and

servicing strategy (both during construction and operation) is set out in detail the outline Construction Logistics Plan and outline Delivery and Servicing Plan. Further details of how site access arrangements would be managed both during the construction and operational phases will be secured through conditions. TfL raises no objection, subject to a financial contribution of £190, 000 towards bus network capacity enhancements and £600, 000 towards provision of step free access at Alperton Station, which is agreed by the applicant and will be secured through the s106 agreement. The proposals are considered acceptable in relation to the potential transportation impacts, subject to the recommended conditions and obligations, as set out.

RELEVANT SITE HISTORY

There is a long and detailed planning history relating to historic uses of the Atlip Centre and 2 Atlip Road, including an expired consent and a large number of more minor proposals. These historical applications are not considered to be relevant.

CONSULTATIONS

Public consultation

A total of 769 nearby properties were notified of the application by letter on 29th February 2024. In addition, a number of site notices were displayed in the locality on 15/03/2024, including various locations along Atlip, Ealing and Sunleigh Road(s) and a press notice was published on 07/03/2024.

Representations were received from 16 different people (noting that some people submitted more than one representation). This includes two (2) neutral comments and 14 objection comments, one of which is from a ward Councillor for Alperton. There is also an e-petition objecting to the development with 145 signatories. The comments received and the grounds for objection from these interested parties are summarised in the table below.

Consultation has also been carried out with all relevant statutory and non-statutory consultees, including re-consultation where required following the submission of further information or revisions (as set out below)

Representation Comments	Officer Remarks
Principle of development	
This is an unnecessary development for the local community and it will have a detrimental impact upon it. The area is becoming more polluted and overcrowded because of all the new developments.	The proposal would help to meet an identified need for homes in the borough and is situated within a highly sustainable site allocated for residential mixed-use development, within an identified Growth Area where more dense developments are directed and supported in principle, in policy terms. The adopted Local Plan and the polices therein have been through public consultation. This ensures that there are sufficient local services and amenities to support additional housing and growth in the borough.
The development by adding to the new high rise buildings being built would make Alperton very crowded and deteriorate life quality.	Please see above.
Alperton is losing its cultural and community feel because of all modern developments being built. The proposed development will compromise the cultural feel of the area.	Please see above. It should also be noted that the proposed development would deliver a new modern community centre for the area.
Design and impact on character of surrounding area	
The height of the proposed buildings is excessive. Planning permission should not be granted for development of buildings higher than 10 storeys.	The site is located within a Tall Building Zone and there is nothing in planning policy to justify restriction of building heights to 10 storeys. Proposed building heights are in keeping with building heights in the locality. This matter is

	considered in detail the 'Design considerations' section of the report.
The proposed development will obstruct and dominate the horizon.	The appropriateness of the location for tall buildings is established in the Brent Local Plan by the Tall Building Zone designation for this part of Alperton. A consequence of this is that development involving tall buildings will result in townscape impacts and this is considered in detail under the 'Principle of Development and 'Design considerations' sections of the report.
The community hall will be a centre piece for the local area but appear modest in appearance. It should be more ambitious and grander.	Please refer to the 'Design' considerations section where the merits of the design are considered in more detail.
Amenities	
Loss of daylight, sunlight and outlook to neighbouring properties	Please refer to the 'assessment of amenity impacts' section of the report where such impacts are considered in detail alongside the results of the BRE assessment undertaken.
The buildings will block the amount of sun that residents currently have and therefore will dampen moods and potentially lead to depression.	Please see above and refer to 'assessment of amenity impacts' section.
Loss of privacy and overlooking impact. In particular, the balconies would overlook into neighbouring properties	Please refer to the 'Relationship with neighbouring sites and assessment of amenity impacts' section where this is considered in detail.
Overbearing impact on neighbouring properties	Please see above
The new builds in Alperton have resulted in existing nearby flats getting colder and affecting occupiers wellbeing. Winds that are created by existing tall buildings mean that residents are unable to use some existing balconies.	Please refer to the 'microclimate' section of the report in relation to the impact the proposed development will have on wind conditions in the locality.
The proposal will ruin the views that some residents have.	Private views are not protected by planning policy or guidance, but outlook is considered, as referred to above. Please see the 'assessment of amenity impacts' section of the report.
Infrastructure	
Additional and better facilities, local services and infrastructure are needed in Alperton to serve development recently built in the area and future development.	Infrastructure requirements to support growth are identified through the preparation of local plan documents and through consultation with statutory consultees on individual schemes. New development also provides funding towards infrastructure improvements through the Community Infrastructure Levy (both Brent and Mayoral CIL) and s106 planning obligations. Both CIL as well as specific financial contributions will be secured as part of any approval, and these contributions are set out in the 'recommendations' section. Site allocation policy BSWSA3 infrastructure requirements are addressed throughout the report.
There is already a shortage of local amenities in the area and not enough green parks for existing residents. The local infrastructure is not set-up to handle another large influx of new	Please see above. It should also be noted that new publicly accessible open space and new public realm is to be delivered as part of the development. Significant Community

residents with huge blocks of flats are already being built just across the road.	Infrastructure Levy contributions will also be paid to fund infrastructure should the scheme be granted permission and delivered.
The proposal will put a strain on NHS services which are already stretched in the area. It does not make sense to have more residents without increased services (i.e. GP's).	There is no specific policy requirement for new health facilities / GP surgeries to be provided to support new development within site allocation BSWSA3.
Proposal will put a strain on school places.	As above, there is no specific policy requirement for additional school places or schools to support growth in the Alperton area.
Concerns over the loss of the gym in the Alperton centre which is particularly important to the community.	This is addressed within the 'Principle of development / proposed land uses' section of the report.
Loss of existing Atlip Centre car park	This is not a public pay and display car park, it is privately owned and primarily serves users / visitors to the Atlip Centre. If this building is demolished, then it can be expected that demand for use of the car park would reduce considerably. The site allocation policy does not seek car park reprovision as part of the sites redevelopment. As set out in the 'Transport and access' section of the report, in planning policy terms there are no grounds to justify reprovision of the existing car park as part of the sites redevelopment.
Will the replacement of the existing amenities proposed to be demolished be open to the public or just for residents of the development?	The scheme includes a combination of publicly accessible open space, including play space and non-residential uses (including a new community centre and flexible Class E commercial spaces) that will be open to the surrounding community. This is set out further within relevant sections of the report.
A number of businesses in the Alperton Centre will have to close if the consent is granted.	Whist some of the existing businesses will need to relocate, the redevelopment of the site includes a mix of uses comprising commercial Class E space fronting Ealing Road, and to the rear of Building A and workshops to the north east corner of the site. The proposed uses are supported in principle and considered to be in accordance with key strategic and local policies and wider aims of the site allocation. Please see the 'Principle of Development / proposed land use' section of the report where this is discussed further.
There is a need for more County and Crown Courts in the borough given the rise in population. What provision has the council made for that and will the plan from the developers be amended to allocate of a portion of one of the buildings to such a purpose?	No additional need for County and Crown Courts was identified in the borough's Local Plan. This use is not a requirement of the site allocation policy either.
Transport	
Concerns over the impact of the proposed development on Alperton Station, which is already crowded during peak hours. The station would need to be improved and tube services increased.	These matters are addressed in detail in the 'Transport and access' section of the report.

How can TFL and the council support such a new, large influx of passengers at this station?	The proposal has been reviewed by TfL who requested financial contributions from the applicant towards bus service mitigation and step free access improvements to Alperton Station as part of any approval. These contributions are agreed to by the applicant. No concerns have been raised either by TfL or Brent Transport officers in relation to impacts from the development on public transport. Please refer to the 'Transport and access' section of the report.
Viewing proposed floorplans for accessible residents reintroduces the lack of accessible infrastructure at Alperton Station.	Please see above.
Insufficient parking provision, it is not practical to only propose blue badge parking on site. Should also be securing electric vehicle charging.	The development would be car-free, except for the provision of 20 disabled parking spaces, which is in line with London Plan and Local Plan policies. This approach to non-car modes of travel is acceptable in a highly sustainable location such as this where there are very good public transport options, and this is supported by strategic and local planning policies Two car club spaces are also proposed to be provided within the site and cycle parking numbers in accordance with London Plan standards. Please refer to the 'Transport and access' section of the report for further details.
The proposal would increase illegal parking and will lead to knock on parking pressures in local roads.	There are no indications that the proposal would result in an increase of illegal parking locally. It is proposed as a car free development and to mitigate potential parking impacts a permit free restriction for future residents will be secured as part of any forthcoming consent. This permit restriction would prevent any residents of the development (save for blue badge holders) from being eligible for any on-street parking permits in the locality, which would apply to existing Controlled Parking Zones operating, any existing controlled zones that are extended in the future, or any new controlled zones introduced following public consultation. Sufficient s106 funding has been secured from other development in the locality to consult on future controlled parking proposals. All spaces will include electric vehicle charging points from the outset. Please refer to the 'Transport and access' section of the report for further consideration of this.
Waste	
The proposal will further increase the existing rubbish and waste issues in the area.	Please refer to the 'Transport and access' section of the report where refuse storage and collection arrangements are discussed.
Landscaping	
The central area should feature an elegant and beautiful public garden with flowers and seating for the locals to enjoy. The trees could be relegated to the adjacent road, and the central	The proposal has been reviewed by the Council's Tree officer and assessed against the relevant Local Plan and London Plan policies. Please refer to the 'Green Infrastructure' section

area to low lying flower beds and displays.	of the report for further details. Any consent would be subject to a detailed landscape condition which would deal with detailed matters such as layout, planting species, size and locations.
The rows of trees do not make a public green space.	A new publicly accessible open space is proposed within the centre of the site and it is expected that this space would include provision for new tree planting.
Environmental health considerations	
The proposed development by increasing traffic will cause further air pollution, reducing air quality.	An Air Quality Assessment has been submitted with the application demonstrating that the development would be air quality neutral in respect to both transport and building-related emissions. As this is proposed as a car-free development it would not be expected to generate greater vehicle trips than the existing site currently does. Please refer to the 'Environmental considerations' section of the report.
The development will increase noise pollution in the area, detrimentally impacting the quality of life of residents.	The application demonstrates that there would be no significant impacts arising from the development so as to result in undue harm in respect of noise pollution. The application was reviewed by the council's Environmental Health Team who raised no objections with regard to noise pollution. Relevant conditions would be attached to any forthcoming in line with standard practice. Noise from construction works and associated traffic would only be a temporary impact and shall be managed through a pre-commencement Construction Method Statement as well as other conditions. Please refer to Environmental health section of the report for further details. The proposed land uses are compatible with the locality and are not expected to give rise to future noise issues once in use/operation.
The proposal would create a significant amount of construction and air pollution. This is a concern for children, elderly, pregnant women and other vulnerable people.	Please see above – the Construction Method Statement to be secured by condition shall set out measures to minimise impacts on air quality during construction, such as from dust. A construction logistics plan will also be secured as part of a condition to any forthcoming consent, which will also contain measures to further mitigate any temporary effects.
The high rise buildings would increase wind tunnels which are unsafe for vulnerable people and can cause accidents on the road whilst walking. What steps are being taken to mitigate any pollution or environmental issues?	Environmental impacts (including wind / microclimate) are discussed in detail under the relevant sections of the report.
Concerns that the development will lead to more crime and anti-social behaviour.	The proposal has been reviewed by the Designing out Crime Officer (Metropolitan Police). No objection is raised. A condition will be secured as part of any approval in relation to implementation of secure by design measures.

Ecology and biodiversity	
There are birds nesting in trees, swans in canals etc. What work is being done to mitigate any risk to the animals of the area?	An Ecological Assessment has been submitted with the application to demonstrate the impact in respect of trees, wildlife, and existing habitat. This has been reviewed by the Council's Ecology Officer who raises no objection but recommends securing certain conditions, as set out and addressed in the 'ecology and biodiversity' section of the report.
Other	
Fire risk, especially from having from having such tall buildings next to residential roads given London's	The proposal has been reviewed by the Health and Safety Executive and the GLA. No objections were raised to the proposed fire strategy. All relevant buildings 30m or higher contain second staircores. Please refer to the 'Fire safety' section of the report for further details.
Impact on the value of neighbouring properties property.	Impact on land or property value is not a material planning consideration. This is not afforded any weight.
The Shree Sanatan Hindu Mandir Temple nearby is a fragile building and the building work could compromise the structure and foundations of the Temple	This building is located c.280m away from the closest part of the site and in any event this is not a material planning consideration.
The community hall should be called Alperton Hall rather than Altip Hall as it's situated in Alperton, literally across from the station, a one-minute walk away.	This falls outside the scope of this application and any future naming of the proposed buildings is not a material planning consideration.
Lack of community consultation. Local resident concern about the lack of publicly available information in relation to the proposals, and clarity sought on location of proposed buildings.	Please refer to the 'Statement of Community Involvement' section below which sets out the extent of public / community engagement undertaken by the applicant as the proposals were being developed prior to submission Public consultation involving letters being sent to 769 nearby properties was undertaken for a minimum of 21 days, in line with planning legislation statutory requirements. Additionally, a number of site notices were displayed on 16/10/2023 including locations on Atlip, Ealing and Sunleigh Road(s) and a press notice was published on 19/10/2023. These each advised that the plans and associated documents showing the location of the proposed development are publicly available on the council's website and have been for the entire length of time since the application was registered valid in February 2024.
Impact on child safety due to overlooking of Alperton School's playground.	The schools external playing areas are located to the west and north-west of the main school building. At its closest point the separation of these to the application site is c.130m, which is across Ealing Road. With such generous separation to be maintained it is not considered there would be an issue. There is also other development closer to the school that has

	greater potential for overlooking of external spaces around the school.
Development will lead to increased risk of flooding / surface water flooding.	Please see 'flood risk, drainage and water' section of the report. The application is supported by a detailed FRA and Drainage Strategy and these adequately assess the risk of flooding from external sources such as fluvial, sewer, groundwater and reservoir flooding, which is low. They also adequately assess the risk from surface water flooding, with an appropriate mitigation and SuDS strategy proposed that will result in a betterment compared to existing. The LLFA has no objection to the SuDS strategy principles, subject to recommended conditions.
General comments	
More affordable homes are needed, and it is acknowledged the co-living homes proposed may help to relieve pressure on the housing market which in turn may free up more family homes in the area. Provision of new green space and community space are also positives and would welcome these elements in any future planning applications.	Noted

Statutory / Non- statutory consultees

Greater London Authority / Transport for London initial Stage 1 response summary:

The GLA provided comments on a number of strategic issues raised by the scheme within their initial "stage 1" response, which are summarised as follows:

Land Use Principles: The principle of the mixed-use development containing residential units, co-living units, and commercial and community uses is generally supported, providing that the requirements for large-scale purpose-built shared living accommodation, including the requirement to make an affordable housing contribution, are addressed.

Housing: The development includes 26% affordable housing by habitable room as a proportion of the C3 residential units, which is also proposed to account for the affordable housing contribution from the co-living accommodation. This fails to meet requirements and GLA officers questioned the applicant's financial viability assessment to ensure the maximum viable amount of affordable housing is provided.

(*Response;* There has been further discussion between the applicant, their viability consultant and the GLA's viability team. It has subsequently been agreed by the GLA that the proposed amount of affordable housing which is the equivalent of 20% co-living NIA floorspace and 20% C3 by habitable room represents the maximum reasonable amount that the scheme can viably support. This is discussed in greater depth below in the relevant section of this report)

Urban Design: No strategic concerns were raised to the principle of tall buildings on the site. However, refinements in relation to the development layout, internal quality, architecture and materials and public realm and landscaping should be considered. The proposal is not considered to result in any harm to nearby designated heritage assets.

Transport: A contribution to deliver public realm improvements should be secured. Additionally, contributions for tube station upgrades and bus enhancement are also sought. Cycle parking should be increased in line with London Plan standards.

(*Response*: Contributions towards the aforementioned areas have been agreed between the Council, applicant and TfL. As set out in the draft Heads of Terms)

Sustainability and environmental issues: Further information is required on energy, whole-life carbon, circular economy and green infrastructure. The development would mostly meet requirements in terms of air quality, flood risk and drainage, and green infrastructure; however details should be secured by appropriate conditions.

Transport for London (TfL)

In their initial response, TFL Infrastructure Protection (TfL IP) raised an objection in relation to impact on infrastructure due to concerns that the development would significantly increase the potential risks to the operational railway compared with the existing building – as discussed in the 'Remarks' section of the report. These concerns have been addressed during the course of the application and TfL IP has confirmed they remove their initial objection, subject to appropriate conditions.

Aside from the above infrastructure matters, TfL noted that whilst the proposal generally accords with London Plan policies, some points are to be clarified and secured via s. 106 obligations, in relation to the following:

- Further thought should be made into the design of the ground floor to ensure that there are clear and safe bicycle routes within the site to avoid conflicts and to maximise the public realm;
- Additional cycle parking spaces need to be provided on site to comply with Local Plan Policy T6.1 and the final numbers and design of the cycle parking should be secured via condition/ legal agreement;
- A contribution should be secured towards reviewing local parking controls
- Improvements and maintenance towards Healthy Streets should be secured in line with the findings of the ATZ assessment;
- Contributions towards public transport enhancements will be required (towards Alperton station improvements and towards local bus capacity and network improvements).
- A detailed Travel Plan should be secured through the Section 106 agreement;
- A detailed Construction Logistics Plan (CLP) and Delivery and Servicing Plan (DSP) should be secured by condition.

It is considered the majority of comments raised in the GLA and TfL's Stage 1 responses have been satisfactorily addressed. There are no substantive matters unresolved, as discussed within the main body of the report.

Environment Agency: No concerns were raised. Advice was provided in relation to Non-Road Going Mobile Machinery (NRMM), the use of Sustainable Drainage Systems (SuDS) and water resources.
Active Travel England: No specific comments provided, defer to Standing Advice and TfL comments
Greater London Archaeological Advisory service: No objections raised. The proposal is unlikely to have a significant effect on heritage assets of Archaeological interest.
Designing Out Crime (Metropolitan Police): A condition to achieve Secured by Design certification will be needed as part of any approval and will require further consultation with the applicant.
Thames Water: No objection providing that the developer follows the sequential approach to the disposal of surface water. A condition in relation to the submission of a Pilling Method Statement is required.
Health and Safety Executive: Following from the additional information provided, confirmation was received that the HSE is 'content' with the fire safety design aspects of the proposal.
Internal consultations
Environmental Health: Environmental Health raises no objections to the application subject to a number of conditions relating to internal and external noise levels, sound insulation, substation noise, construction noise and dust, and contaminated land. See 'Remarks' section of report for further comments on these issues.
Local Lead Flood Authority: Following the review of the revised Flood Risk Assessment and Drainage Strategy report, the LLFA raised no objection to the proposal subject to relevant conditions to be added as part of any approval.
Recycling and Waste Officer: The reduction in waste capacity for Block A of the co-living development does not meet LBB waste policy standards. If no design alterations can be achieved, payment for additional refuse, recycling and food waste collections would need to be secured to ensure there is no waste overspill. The rest of the waste management strategy is considered acceptable. The location of dropped kerbs outside of all storage areas should be confirmed to ensure suitable collection can be achieved.

Statement of Community Involvement

The National Planning Policy Framework (2024) and Brent's Statement of Community Involvement set out an expectation that developers will undertake a proportionate level of engagement with the local community prior to submitting a planning application.

A Statement of Community Involvement (SCI) has been submitted with the application, setting out the public consultation and level of engagement undertaken before submitting the application, as required through the Localism Act (2011). highlights that through the pre-application process, the applicant has engaged with a wide range of local stakeholder and elected representatives to offer briefings on the proposals.

A letter with information about the forthcoming public exhibition and website was sent to c.2,800 addresses in the vicinity of the site on 4th May 2023. The consultation also included hand-delivered letters and door knocking with local residents of Sunleigh Road, Clifton Way, Wendy Way, Fairbanks Court, Bigler Court, Comstock Court, Kolar Court, Dawson Court and Hayes Court as well as businesses on the site, along Ealing Road between Alperton station and St James Gardens and the Sunleigh Road business park. Some of the stakeholders were also informed of the public consultation via email invitations.

Two public consultation events were also held on Thursday 11th May and Saturday 13th May 2023 at the Alperton Community School. A total of 39 people attended the events, with representatives from 243 Ealing Road Residents' Association and local ward councillors. Additionally, two workshops were arranged with secondary school pupils from Alperton Community School to capture their aspirations for their area.

A website was set up and accessible from the 11th May to coincide with the opening of the in-person events, providing information on the project, links to access the public exhibition materials, an online feedback form and a monitoring email address.

Two meetings with local ward councillors, Councillor Anton Georgiou and Councillor Bhagwanji Chohan were also organised as well as a meeting with the nearby 243 Ealing Road Residents' Association. A meeting was also set-up with the Ealing Road Market Traders and local tailors to inform on the scheme and receive their feedback and input for the tailor workspaces.

An addendum to the SCI was also submitted in March 2024, detailing a second phase of engagement. This includes a second round of consultations undertaken in February 2024 to present the final scheme and explain how the previous round of consultation influenced the final scheme.

This second phase included letters to residents, additional door-knocking of neighbouring residents and meetings with local stakeholders. The website was updated to reflect the final scheme. A public exhibition was also set-up taking place on 17th February and 20th February 2024 at Alperton Community School, with a total of 46 people attending the events across the two dates.

Key stakeholders were contacted and invited to the public consultation events and to a separate meeting with the Project Team either virtually or in-person. These stakeholders included local politicians, local resident associations and community organisations.

The applicant responded to the concerns raised by residents within the SCI, with key comments relating to the flexibility of the green space proposed, opportunities for the community space and housing needs for the Alperton area.

The number of activities, the extent of consultation and level of engagement undertaken prior to submission are considered to be appropriate to the scale of the development proposed and consistent with the advice set out in Brent's SCI.

It should be noted also that the proposed development went through Brent's Design Quality Review process and was scrutinised by panel members, with more than review taking place. A pre-application meeting was held with the GLA (and TfL). A pre-application presentation was also made to Members of the Planning Committee. The feedback received from these has informed the submitted proposals.

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, relevant to this proposal, is comprised of the:

London Plan (2021)
Brent Local Plan (2019-2041)

Key policies include:

London Plan (2021)

GG1: Building strong and inclusive communities
GG2: Making the best use of land
GG4: Delivering the homes Londoners need
GG5: Growing a good economy
D1: London's form, character and capacity for growth
D2: Infrastructure requirements for sustainable densities
D3: Optimising site capacity through the design-led approach
D4: Delivering good design
D5: Inclusive design
D6: Housing quality and standards
D7: Accessible housing
D8: Public realm
D9: Tall buildings
D11: Safety, security and resilience to emergency
D12: Fire safety
D13: Agent of Change
D14: Noise
H1: Increasing housing supply
H4: Delivering affordable housing
H5: Threshold approach to applications
H6: Affordable housing tenure
H10: Housing size mix
H16: Large-scale purpose-built shared living
S1: Developing London's social infrastructure
S4: Play and informal recreation
E9: Retail, markets and hot food takeaways
E11: Skills and opportunities for all
HC1: Heritage, conservation and growth
HC3: Strategic and Local views
G1: Green Infrastructure
G5: Urban greening
G6: Biodiversity and access to nature
G7: Trees and Woodland
SI1: Improving air quality
SI2: Minimising greenhouse gas emissions
SI3: Energy Infrastructure
SI4: Managing heat risk
SI5: Water infrastructure
SI6: Digital Connectivity Infrastructure
SI7: Reducing waste and supporting the circular economy
SI12: Flood risk management
SI13: Sustainable drainage
T1: Strategic approach to transport
T2: Healthy streets
T3: Transport capacity, connectivity and safeguarding
T4: Assessing and mitigating transport impacts
T5: Cycling
T6: Car parking
T6.1 Residential parking
T6.3 Retail parking
T6.5: Non-residential disabled persons parking
T7: Deliveries, servicing and construction
T9: Funding transport infrastructure through planning

Brent Local Plan (2019-2041)

DMP1: Development management general policy
BP7: South west
BSWGA1: Alperton growth area
BSWSA3: Atlip Road site allocation
BD1: Leading the way in good urban design
BD2: Tall buildings in Brent
BH1: Increasing housing supply in Brent

BH2: Priority areas for additional housing provision within Brent
BH5: Affordable housing
BH6: Housing size mix
BH7: Accommodation with shared facilities or additional support
BH13: Residential amenity space
BSI1: Social infrastructure and community facilities
BE1: Economic growth and employment opportunities for all
BHC1: Brent's Heritage Assets
BHC2: National Stadium Wembley
BHC3: Supporting Brent's culture and creative industries
BGI1: Green and blue infrastructure in Brent
BGI2: Trees and Woodlands
BSUI1: Creating a resilient and efficient Brent
BSUI2: Air quality
BSUI3: Managing flood risk
BSUI4: On-site water management and surface water attenuation
BT1: Sustainable Travel Choice
BT2: Parking and car free development
BT3: Freight and servicing, provision and protection of freight facilities

The following are also relevant material considerations:

The National Planning Policy Framework (NPPF) (2024)
Planning Practice Guidance

Brent guidance documents

SPD1 Brent Design Guide (2018)
S106 Planning Obligations Supplementary Planning Document (2022)
Brent's Waste Planning Guide (2015)
Residential Amenity Space & Place Quality SPD (2023)
Sustainable Environment & Development SPD (2023)
LB Brent Air Quality Action Plan (2017-2022)

Other relevant policy and guidance documents

Mayor of London Large-scale purpose-built shared living LPG
Mayor of London Housing SPG
Mayor of London draft Affordable Housing LPG (2023)
Mayor of London draft Development Viability LPG (2023)
Mayor of London Optimising Site Capacity: A Design-Led Approach LPG
Mayor of London Urban Greening Factor LPG
Mayor of London Sustainable Transport, Walking and Cycle LPG
Mayor of London Air Quality Positive LPG
Mayor of London Circular Economy Statements LPG (2022)
Mayor of London Whole-life Carbon Assessment LPG (2022)
Mayor of London 'Be Seen' Energy Monitoring Guidance LPG
Mayor of London Fire Safety LPG
London Cycling Design Standards
Community Infrastructure Levy Regulations 2010

DETAILED CONSIDERATIONS

Principle of development / proposed land uses

1. The NPPF notes that plans and decisions should apply a "presumption in favour of sustainable development" (Paragraph 11), and this approach is reflected in Brent Local Plan Policy DMP1 and the other policies of the Local Plan. Policy DMP1 confirms the acceptability of developments subject to it satisfactorily addressing the broad issues identified, in order to secure development that improves the economic, social, and environmental conditions in Brent.

2. Chapter 11 of the NPPF promotes the effective use of land, as set out in paragraph 124 which states;

"Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land."

3. NPPF paragraph 125, part c) sets out that planning decisions should *"give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs".*

4. The aim of making effective use of land is carried forward in a number of development plan policies, including London Plan policy GG2, which identifies the optimisation of land, including the development of brownfield sites, as a key part of the strategy for delivering additional homes in London, as well as being reflected in policies D2 and D3 and policies in Brent's Local Plan.

5. The proposed development is on a previously developed brownfield site, in a highly sustainable location, and it proposes housing led mixed-use regeneration that will meet identified housing need in the borough, as well as securing replacement commercial floorspace which will contribute to Brent's economy, and deliver new community uses.

6. Existing non-residential uses on site comprise of c.6, 033sqm of commercial, leisure (Class E) and sui generis operations within the Atlip Centre, and c. 2, 467sqm of non-residential floorspace within no.2 Atlip Road. The Atlip Centre contains several commercial uses, including a gym, on short term leases pending redevelopment of the site. 2 Atlip Road was previously granted permission for use as a cash and carry and has been used for a variety of purposes in recent years. The existing surface car park is mostly used by visitors to the Atlip Centre.

Site allocation policy:

7. The site is located within Brent's Local Plan site allocation BSWSA3 (Atlip Road). The allocated use(s) across the site allocation are mixed-use residential-led, including re-provision of existing gym, re-providing along Ealing Road the range of town centre uses within the Atlip Centre and also the Church of God Prophecy (n.b. *the existing church at 197 Ealing Road is outside of the application site boundary and is not impacted)*.

8. Proposed non-residential uses (Class E, F2 and sui generis), totalling c.866sqm will comprise of;

    - Replacement Class E floorspace (excluding sub-use b) within a new commercial unit on the ground floor of building A which fronts directly onto Ealing Road. Class E use permits a variety of retail and town centre uses.
    - Workspace units within buildings D1 and D2.
    - New standalone Community Centre (building D1)

Conformity with site allocation policy BSWSA3 (Atlip Road):

Gym use:

9. The existing commercial gym use occupies c.1, 645sqm within the Atlip Centre. The site allocation policy identifies gym re-provision as one of the allocated uses, however, it does not stipulate specification or size of gym to be re-provided. No replacement commercial gym is being proposed as part of the development. The applicant has provided details setting out their engagement with the existing gym operator ('The Gym Group'), which was undertaken early on to establish whether there could be an opportunity to retain their operation within the redeveloped site, however the operators minimum floorspace requirements are said to be incompatible with the proposed design as a whole. It has been demonstrated how, if a replacement gym large enough to meet operator requirements was to be provided, it would either result in the loss of the community centre (building D1) or proposed residential floorspace (including associated internal amenity space). Whilst a continued gym presence on site would be supported, in principle, if this provision is to the detriment of the developments viability and subsequently impacts negatively on the overall level of proposed housing, including the affordable housing offer, or it means the community centre cannot be delivered then this needs to be weighed in the planning balance.

10. For context it is important to note that the site allocation policy requirement for the gym re-provision first appeared at Regulation 19 stage of the Local Plan process, as a result of Sport England's strategic engagement with the Council as the Local Plan was being progressed.

11. In response to this consultation the Council responded, noting that *"As this is a commercial facility and there is good gym coverage in the area, with new residential developments including gyms as part of their offer, this is not considered an appropriate policy requirement".* Notwithstanding this, reference to gym re-provision remained in the adopted Local Plan (as referred to in policy BSWSA3), and so is a material consideration.

12. The existing gym use is classed as a main town centre use, though the site is not within an allocated town centre frontage. It is therefore an out of centre use which does not benefit from any form of policy protection currently and through permitted development could change to a range of other uses. The gym use is not protected either by Local Plan policy BSI1, which relates to social infrastructure and community facilities.

13. To justify the lack of re-provision of a gym within the proposals the applicant was asked to provide further detailed justification to support their position that a commercial gym offer would be incompatible with the proposed design, especially given the future increase in residential accommodation, and the potential increase in gym demand that would be expected to follow as a result of the site's redevelopment. As discussed above, re-provision of a gym large enough to meet operator requirements would either result in the loss of the community centre or reduction in number of homes, including affordable homes. To this end further analysis was carried out by the applicant to establish the concentration and geographical spread of existing surrounding commercial gym uses that would be accessible from the application site. This exercise established there are six commercial gyms operating with similar facilities within 2km of the application site, the closest one to site being c.945m away on Beresford Avenue and the next closest being 1.2km away at Central Square, Wembley. Two of these existing gym operators are positioned at a similar price point to the existing gym that would be displaced from the site, and all six gyms are accessible from the site either by walking, cycling or public transport. It is also identified there are a further three specialist health and fitness studios and specialist gyms located within 1.5km distance from site, the closest being c. 530m away on Athlon Road. In total there are nine gym (or similar) uses operating within 2km of the application site.

14. Additionally, commercial gym opportunities are provided nearby on Mount Pleasant at the approved Alperton Manufacturing Estate development (ref; 20/3156), which includes c.1, 112sqm of flexible commercial floorspace (including Class E), which could potentially accommodate a commercial gym offer if this was identified as a suitable site by an operator. This site is located c. 500m from the application site and therefore easily accessible.

15. As referred to above, noting the engagement undertaken with the existing gym operator the applicant was asked to further demonstrate the case made that operator minimum floorspace requirements for a replacement gym would be incompatible with the design overall. In response further details were submitted, setting out that the minimum floorspace requirements for a commercial gym operator are c.500sqm, and it was evidenced how options to accommodate this quantum of floorspace within the designed scheme have been explored and what the implications would be on the rest of the development. These included considering the following options;

    - Loss of the proposed standalone community centre to accommodate a gym use instead.
    - Adding additional floors to accommodate a gym use within the community centre building (*n.b. this was not deemed viable as a building of greater massing needed would have daylight / sunlight effects on Sunleigh Road and would require the building to be pulled in from the boundary to mitigate, this would then be at the expense of the proposed central amenity / public realm space*).
    - Accommodate a gym use within building A (*n.b. this was not deemed viable due to the impact this would have on the internal layout, back of house facilities, reduction in amount of internal amenity space and the subsequent loss of 29 co-living units – negatively impacting the developments viability*)
    - Accommodating a gym use within building B (*n.b. this was not deemed viable due to the impact this would have on amenity, cycle, and refuse store provisions, and the subsequent loss of 19 C3 residential units – negatively impacting the developments viability*)

16. Regard has been had to the overall policy context for gym use re-provision and the feasibility of re-provision has been explored, as well it is recognised that the existing gym use could change use without any form of policy protection, through permitted development. It is also acknowledged that there would be unwelcomed knock-on implications to the development as a whole were the scheme to be redesigned to accommodate a large enough space for a commercial gym operator (minimum 500sqm), as this would be likely to result in either loss of community centre or a reduction in the number of C3

residential units and / or co-living homes, which would then lead to a reduced level of affordable housing being delivered overall. Given the boroughs acute housing needs, including for affordable housing it is considered, on balance, that maximising housing delivery, including securing the maximum viable level of affordable housing should be prioritised over other competing land uses.

Banqueting hall (Clay Oven):

17. Site allocation policy BSWSA3 anticipates the existing banqueting hall within the Atlip Centre (operated by Clay Oven) should be re-provided as part of any future development, in line with Local Plan policy BSI1 (Social Infrastructure and Community Facilities), and that this should be at least to an equivalent scale / quality. The justification for this in the policy is that the existing facility meets the Indian community's needs for large function space associated with weddings and festivals. No replacement banqueting hall facility is being proposed as part of the site's redevelopment, however, as discussed below its re-provision has been duly considered and has been subsequently discounted following discussions with the existing operator (Clay Oven), as well as other banqueting providers.

18. In recognition that the existing hall caters for and is frequented by the local Indian community and that it will not be re-provided on site, the loss of the banqueting facility is supported by an Equalities Statement (EqS). The EqS identifies and presents any equality impacts related to the proposed development, which the Council is required to consider under the 2010 Equality Act. Section 149 of the 2010 Act requires public authorities to have "due regard to equality considerations" when exercising their functions, including decision making on planning applications. Brent has published an Equality Strategy for 2019-2023 with a vision to reduce inequality by meeting the needs of everyone who lives, works, and studies across the borough.

19. The applicant has engaged with the Council, existing tenants and the community through the planning process to understand local concerns and opportunities. To an extent this has shaped the current proposal, notably the proposed provision of the community centre and the workspaces, which may help reduce any inequalities and lead to positive differential impacts.

20. There is no evidence available that would indicate the loss and/or relocation of existing jobs on site would represent a disproportionate or differential impact on people with a specific protected characteristic.

21. With the exception of 'religion' and 'race' there is nothing in the baseline analysis to indicate that disproportionate or differential impacts are likely on people with a specific protected characteristic, as a result of the development being carried out. The loss of Clay Oven will disproportionately affect people from Asian origin, though relocation is expected to be in an area that will serve the same catchment, so the overall effect is not likely to be significant.

22. Some effects would be positive, for example the provision of 47 wheelchair adaptable homes, and accessible public realm / open space would be beneficial for those with a disability. There would also be more general benefits to the local community and Brent as a result of development.

23. Clay Oven's current banqueting operation on site comprises of two banqueting suites, which in total amount to 1, 109sqm. These spaces combined are capable of accommodating up to 700 guests. The existing business is able to operate successfully because it is currently in a commercial location which benefits from significant car parking capacity on site for patrons use.

24. In order to understand the operational requirements for re-providing a banqueting hall as part of the redevelopment to at least an equivalent scale / quality as existing the applicant has tested this against policy BSI1. The policy protects the community role that the existing banqueting suites offer in respect of them being a large function space for events such as weddings (often used by the Indian community), the policy does not seek to protect the commercial catering business itself.

25. The applicant has set out that discussions have been had with the current operator, Clay Oven, to see if it would be feasible to re-accommodate them on site as part of its redevelopment. Clay Oven has confirmed its intention to vacate the site, siting lack of patron parking and operating restrictions as key factors in this decision, alongside the importance to them of being good neighbours. Clay Oven recognises that whilst they would be able to compromise to an extent on venue capacity and reduced operating hours, it would be difficult for them to be good neighbours in terms of noise and odours, for example, with future residents living so close to their business. Furthermore, for cultural events / weddings (i.e. those attended by the Indian community), where visitors will often be wearing expensive attire, access to visitor parking close by is key for those attending and using public transport is said to not be an option for such occasions. The proposed development includes only very limited vehicle parking

on-site, which is in line with national and local policy requirements in a highly sustainable location, and it promotes sustainable development. However, that said, this does not meet the operator's requirements who see access to car parking for patrons as being absolutely necessary to support the commercial attractiveness of any banqueting facility and compete with other similar facilities, and key to meeting visitor expectations.

26. The existing facility benefits from in excess of 100 parking spaces across the site (and for larger events Clay Oven rents c. 35 car parking spaces from Alperton Community School nearby), and the business would like to have access to even more parking still. In view of all this, including the lack of planning policy support (both nationally and locally) to increase parking levels on site in excess of what is currently being proposed, and given the lack of available parking locally outside of the site, even if the proposed development did include a replacement banqueting facility of appropriate size without the current level of car parking being re-provided it would not include what Clay Oven needs as a minimum to operate and compete commercially with other similar operators. From the existing operator's perspective, without the current level of parking, the venue would be less attractive to celebrations of up to 700 guests. Equivalent businesses / competing facilities in Brent are able to operate successfully because they benefit from car parking, have unrestricted operating hours, and do not have proximity issues to sensitive residential neighbours. The applicant states the absence of significant car parking on site, which would in any event be in conflict with Local and London Plan parking standards and wider sustainability principles to promote non-car modes of travel, as well as the other operating restrictions referred to would most likely result in future disturbance issues for nearby residents and detrimentally impact the long-term sustainability of the a banqueting business, were one to remain on site. For these reasons Clay Oven have decided to look for alternative premises from which to operate, as confirmed in a letter provided to the Council.

27. The applicant instructed commercial agents for the existing Atlip Centre to undertake market research into the existing supply of banqueting facilities within Brent (each within 5.2 miles of the application site), looking at factors such as their use, capacity and access to parking. Of the 15 other similar facilities assessed the closes to site is 0.8km away, located on Mount Pleasant (Kachhia Samaj UK – KSL Hall), and this can accommodate up to 225 guests. Other venues that are comparable to Clay Oven in terms of guest capacity and on site parking provision include, Hilton London Wembley, Oakington Manor Primary School and Sattavis Patidar Centre (Forty Avenue) which are all located within 2.4km of the Atlip Centre. Only one existing venue (Brent Hub Community Enterprise Centre on Hillside, NW10) is part co-located with residential uses (noting the use is controlled via restrictive planning conditions), and all banqueting halls other than one on Hillside referred to have access to car parking provision on site, have unrestricted operating hours and do not have proximity issues to sensitive residential neighbours. For these reasons it is evident the feasibility of accommodating a new banqueting facility as part of the site redevelopment, without this having access to a sizeable level of parking spaces, and with limits put in place on operating hours is going to be commercially prohibitive.

28. It is also important to note, there are a number of existing facilities nearby, such as, at Alperton Children's Centre (at Alperton Community School), a new community hub of c.2, 500sqm at the Grand Union development, approved provision for 205sqm at the Alperton Bus Garage development, and further provision of community floorspace nearby at Abbey Industrial Estate / Alperton Manufacturing Estate development (128sqm) and Copland Village (667sqm). The Community Access Plan agreement secured as part of the planning permission for Alperton Community School also supports demand for large events and weddings that might typically have been held at Clay Oven. All these nearby facilities are available for hire and are likely to be capable of catering to the types of large events typically held at Clay Oven. In the context of policy BSI1, a shortfall in provision is not expected to result due to the fact Clay Oven is expected to re-locate to within the same catchment area, due to level of alternative provision in the local area, coupled with the proposed community centre building to be built in site, and therefore it does not appear likely that a high unmet need would exist if the banqueting hall is not re-provided as part of the development.

29. All things considered, the wider aspirations of site allocation banqueting hall re-provision requirement does not reflect the commercial realities of banqueting operations which are generally incompatible with residential uses owing to factors including, late-nights, noise, disturbance and large numbers of attendees (including those visiting by car). Were the scheme to be re-designed to incorporate an appropriately sized banqueting facility then this is likely to sterilise a significant part of the site for residential use and subsequently limit the number of new homes, including affordable homes from being delivered. The operational concerns expressed by Clay Oven are acknowledged in relation to a high density mixed-use redevelopment, as proposed, with very limited parking, which is it acknowledged would represent a commercial risk to this or any other similar operator.

30. As previously discussed, the flexible floorspace (505sqm) space to be provided in the proposed Community Centre (building D1) can play a positive role locally in accommodating a range of functions, cultural events community gatherings, religious festivals and creative industry events, albeit this space is smaller than the current Clay Oven offer, is without patron car parking, and will be subject to residential amenity controls (i.e. hours of use / noise). However, these should not prevent the buildings future use as a banquet space, or space for large events such as weddings, particularly for the Indian community should demand exist. It has been intentionally designed as multi-purpose and flexible community building. The provision of this new standalone facility will benefit new and existing residents and would help in part to mitigate for the loss of Clay Oven in the context of policy BSI1, which supports new social infrastructure that is provided in flexible and adaptable buildings.

31. For the reasons discussed and acknowledged, the lack of re-provision of a banqueting hall as part of the redevelopment is not fully in accordance with site allocation policy BSWSA3, though this loss which has been considered in terms of equality impacts, is considered acceptable, on balance, and the proposed community centre building will help to mitigate for the loss. Maximising the potential of the site for other land uses, including optimising housing delivery, and creating a mixed and sustainable development, rather than re-providing a banqueting hall which is a type of commercial use that would be incompatible with the proposals in many respects, is considered to deliver a number of planning benefits that would outweigh the loss of the banqueting hall.

Retail / town centre Class E uses along Ealing Road;

32. Use class E floorspace (excluding sub-use B) is proposed on the ground floor of building A, which directly fronts onto Ealing Road. Exclusion of sub-use B will prevent the unit from being used for the cooking of hot food retail. This will provide a space that offers flexibility for a range of uses within Class E, which could potentially support a commercial gym in the future, though it is currently envisaged this space will be operated as a workspace and coffee shop, and that it will be accessible to both residents and members of the public. This offer of 237sqm Class E floorspace will help to create a mixed and sustainable development supporting a range of complementary non-residential uses which is in direct response to the site allocation requirements. This will provide an active frontage along Ealing Road, in place of the Atlip Centre. This provision is supported in policy terms and is in line with the site allocation policy.

Workspace:

33. Within buildings D1 and D2 workspace is proposed, notwithstanding the fact there is no policy requirement to as no industrial floorspace would be lost through the site's redevelopment. The proposed workspace in building D2 (124sqm) has been designed specifically to meet the needs of creative industries in the local area (i.e. tailors and jewellery makers in the Asian/Indian community which already have a strong established local presence on Ealing Road), which shall support and strengthen further the Ealing Road Creative Enterprise Zone. This provision is welcomed by the Council's Regeneration Officers who have discussed this offer with the applicants, and it is supported by the site allocation policy, which promotes the provision of workspace. Furthermore, it would help to activate the north-eastern part of the site, makes efficient use of that narrow strip of land and it would serve well the local demographic. Local Plan policy BHC3 supports this provision, as it supports the development of creative industries in the Borough.

34. A Priority Marketing Strategy to identify local occupiers for the workspaces shall be secured through condition.

Community Centre (Use Class F2):

35. There is no specific policy requirement for a new community centre on site. However, a new standalone multipurpose function space of c.505sqm is proposed towards the eastern side of the site. As discussed above, this space would lend itself to use by the local community and a range of other user groups and stakeholders. Flexible use for this space is sought to maximise end user opportunities with proposed uses including Class F2: *local community*, Class E: *commercial, business and service* (excluding sub-use (b) and Sui Generis (creative industries), ensuring it can be accessible to the local community, local creative industries and cater for some commercial uses (which are necessary to fund its ongoing future management and operations). The inclusion of this new community facility, and the flexibility of use intended for it is supported in planning land use terms, and furthermore this will help in part to offset the displacement of the existing banqueting hall from the site. This is because it will be a space that can potentially accommodate a range of events, such as cultural events, festival celebrations, weddings and functions that may otherwise have previously been held in the Clay Oven banqueting hall. It will also be able to host less formal local community uses for new and existing residents, such as, birthday parties, film screenings, creche and homework clubs, which will be beneficial for the local community. This

proposed facility is supported through Local Plan policies BSWGA1, BHC3 and BSI1, it will be a public benefit for both the existing local population and future residents moving into the area, particularly as the population of Alperton continues to increase as a result of further development and housing growth within this growth area and demand for social infrastructure also increases.

36. The supporting information provided sets out that whilst initial meetings have been held, an operator for this facility has not been identified as yet, and this would be confirmed post decision (should planning permission be approved). The indicative community centre and management plan provided sets out that selection of the final operator would be carried out by a Community Building Panel, which would be made up of applicant, key stakeholders and local groups. As such the internal design of the space will be finalised following future operator input. The building has been designed with the intention this functions as a flexible and multi-functional space, which can potentially accommodate co-working space, community events and a range of activities. Supporting functions such as reception, office space, kitchen space, storage and toilet facilities will be necessary as well. The first floor will have its own dedicated access, offering greater flexibility of use day and night. The design of the venue has been shaped by engagement with local stakeholders.

37. For the space to succeed there will need to be an income stream to support and subsidise events, activities and the on-going operational costs of running and maintaining the building. Further to the appointment of an operator a detailed management plan (and community use agreement) shall be secured prior to the use commencing. This is expected to set out hire rates, which shall be comparable to other similar facilities in the local area, and include some provision for discounted rates to be offered to local charities and community groups, and further details of this shall be secured in the s106 legal agreement.

38. For the proposed workspace (building D2), the applicant is intending to explore whether the eventual operators of the community space would be interested in taking on the management of the maker space as well. It is considered there are potential synergies across both buildings. It is understood that discussions have taken place with officers in the Councils Regeneration team in relation to the space's future management, though nothing is agreed currently. The ambition is to let the space to local tailors / creatives, which ties in well with and would complement the Ealing Road Creative Enterprise Zone.

C3 Housing and co-living homes:

39. There would be no loss of existing residential dwellings, and the provision of 464 additional C3 dwellings, plus 421 co-living homes (885 total residential units) would notably contribute towards the unmet housing needs across the borough. This uplift in homes would also help to deliver the additional number of new homes planned for in Alperton Growth Area over the Local Plan period.

40. Co-living is a recognised housing product primarily aimed at single person households that choose not to live in self-contained houses / flat shares or HMO's. The London Plan advises that in terms of meeting housing targets, co-living housing should count towards this on the basis of a 1.8:1 ratio (i.e. every 1.8no bedrooms / units is the equivalent of 1no home). For the proposed development, 421 co-living homes would equate to 213no dwellings, resulting in the equivalent of 677 residential homes when combined with the C3 dwellings . As a recognised housing product this element of the development would also contribute towards meeting the Council's housing targets.

41. Local Plan policy BH7 states that proposals for residential accommodation with shared facilities (i.e. co-living accommodation) should amongst other things be located in an area with good access to public transport and other amenities, which this site is (it is in PTAL 4), and that it should be demonstrated there is a specific Brent need for the particular use. Subject to it being satisfactorily demonstrated that the co-living use meets a specific Brent need there would be no objection to this form of residential accommodation, in principle (subject to other considerations, such as it being of an appropriate standard and including suitable management arrangements). A co-living Local Housing Needs Assessment has been provided in support of the application to address policy BH7, this seeks to demonstrate that it does indeed meet a housing need in Brent. This assessment is considered in more detail within the 'Housing' section of this report.

42. London Plan policy H1 sets out housing targets across London, with the current target for Brent being 23,250 new homes over the ten-year plan period. Local Plan policy BH1 responds to this by proposing plan-led growth concentrated in Growth Areas and site allocations to provide a minimum of 23, 250 homes in the period up until 2028/29 and a minimum of 46, 018 homes in the period up until 2041. Local Plan policy BP7 sets a target of a minimum 6, 800 new homes in the Alperton Growth Area and supports co-locating residential uses in areas well served by public transport. Site allocation policy BSWSA3 identifies an indicative capacity for 450 dwellings.

43. The quantum of C3 dwellings proposed contributes towards the meeting the aforementioned housing targets (both for London and Brent) as well as the indictive capacity identified in site allocation policy BSWSA3, which would in fact be exceeded, and contributes towards housing delivery in one of the Mayor's designated Housing Zones. The co-living units would further contribute to these housing targets at a ratio of every 1.8no bedrooms / units being equivalent to one new home.

Land use summary:

44. The proposed redevelopment of the site involves the loss of an existing commercial gym and banqueting hall which is not fully in compliance with policy BSWSA3, though it is considered their loss has been satisfactorily justified as discussed in detail above. Overall, the redevelopment of the site for a mixed-use residential-led scheme with commercial and community floorspace will make effective use of a brownfield site in a highly sustainable location and it will support the wider regeneration aims for the site and is supported at a local and regional level through the site allocation policy in the Local Plan.

45. There is a housing need for all sizes and tenure of accommodation, especially for affordable and family sized dwellings. The proposal would represent a significant uplift in the delivery of housing, including affordable housing and family housing, in a highly sustainable location, contributing to housing targets for the borough as a whole, and more locally for Alperton Growth Area. Co-living accommodation is acceptable for inclusion given this does not fetter the delivery of conventional C3 dwellings across the site and is in a highly sustainable location, subject to it being satisfactorily demonstrated it will meet a specific Brent need, which is addressed in the following housing section of this report.

Housing need, mix of accommodation and affordability

46. As referred to previously, London Plan Policy H1 sets out housing targets across London, with the target for Brent being 23,250 new homes over the ten-year plan period. Brent's Local Plan Policy BH1 responds to this by proposing plan-led growth concentrated in Growth Areas and site allocations.

47. The proposed development would deliver a total of 464 new homes (Class C3), and 421 co-living homes. Combined this will deliver a significant quantum of new housing, making a meaningful contribution towards the Borough's housing need, increasing housing choice (through the different tenures and typologies proposed) and this responds well to the strategic housing targets for Brent as well as the Alperton Growth Area, as set out in the Local Plan.

48. The proposed number of new homes exceeds the indicative capacity (450 dwellings) identified in the site allocation policy, though the number of new homes proposed is considered appropriate due to the policy expectation that requirements development to make the best and most efficient use of land by following a design-led approach, which suitably optimises the capacity of sites.

49. Co-living housing is an expanding large-scale purpose built shared living (LSPBSL or co-living) residential product, which combines private living with a range of high-quality shared communal amenity spaces. It provides an alternative product to the private rented sector, typically offering residents a much higher quality of accommodation than traditional multiple occupancy homes. By offering significantly enhanced amenity facilities and services on-site these types of managed developments are attractive to prospective tenants.

50. LSPBSL generally provides accommodation for single-person households who cannot, or choose not to, live in rented self-contained homes or HMO's. Typically, this accommodation type may be used on a transitional basis until residents find suitable longer-term housing. Whilst LSPBSL provides an additional housing option for some, due to the unique offer of this accommodation type it does not meet minimum housing standards and is therefore not considered to meet the ongoing needs of households in London. It is therefore not recognised as an affordable housing product because it does not provide accommodation suitable for households in need of genuinely affordable housing, including families.

51. As referred to previously, it should be noted that as a recognised housing choice, co-living units are counted towards housing supply on a ratio of 1.8:1 basis, as per London Plan policy H1, which in this case equates to 213 C3 homes.

Needs Assessment / Co-living homes:

52. Local Plan policy BH7 (criteria d) requires shared accommodation to address a need within the Borough. The application is supported by a co-living Housing Needs Assessment (April 2024), which evaluates the

need for this type of accommodation in Brent, and where appropriate, more locally within the Alperton Ward.

53. The assessment confirms that due to house price increases over the last 10 years, the number of households not able to afford to buy their own home but would also not be eligible for social rented housing has increased substantially. It is estimated that now over c.83, 000 households fall within this category (more than half of all households in the Borough).

54. Due to lack of intermediate housing these households require housing in the private rented sector. This is evidenced by virtue of the fact the number of households relying on this sector has increased by over +36% in the Borough since 2011.

55. The largest group living in the private rented sector (42%) are 16-34 year olds (Census 2021), many of whom are typically single households with a single income. There is a low stock and supply of new homes for this group. Census data shows that one bedroom homes make up just 15% of all homes in Alperton Ward. The needs of this group are not met sufficiently either through the existing shared rental sector, which generally is experiencing a reduction in the number of properties available due to a range of external and economic factors.

56. The assessment concludes that the proposed co-living units will;

    - Contribute to meeting the unmet needs of single persons by providing greater single person housing choice and supply. There is an increasing number who cannot afford to buy locally but aren't eligible for social rent housing, so presently have no choice but to try to rent a room in the private rented sector, which is often typically low quality and poorly managed accommodation. It is also increasingly difficult to access due to reduced availability.

    - Contribute to meeting the unmet needs of local families indirectly by reducing pressure on converting existing family homes for shared living. Delivery of enhanced co-living homes will provide choice and competition which will reduce demand for traditional shared rental housing, freeing these up for family occupation (recognised in the London Plan through the application of the aforementioned 1:1.8 ratio)

    - Contribute to providing a more mixed and balanced community and that it will not lead to an over concentration of co-living housing locally, and;

    - Provide affordability benefits, with co-living rents typically being less than studio flat rents.

Family Housing:

57. Local Plan Policy BH6 (Housing size mix) sets out that 1 in 4 new homes should be family-sized dwellings (i.e. 3-beds or greater). Exceptions to the provision of family sized dwelling are allowed where the applicant can show that the location of the development would not be able to provide a high-quality family environment, or its inclusion would fundamentally undermine the development's delivery of other Local Plan policies.

58. The proposal would deliver a total of 93 family sized homes (3-bed), which represents 20% of all C3 dwellings. The family sized units are prioritised within the affordable tenures, in recognition of the Borough's most acute housing needs. As a result, 46% of all Intermediate tenure homes proposed are family sized which increases to 82% for all London Affordable Rent (LAR) tenure homes. In total 66% of all affordable tenure homes are family sized This weighting of family homes towards the affordable tenures is in response to Brent's greatest area of housing need and helps to mitigate against the overall shortfall.

59. To achieve the BH6 policy target that 1 in 4 new homes should be family sized the scheme would need to be delivering 116 family sized homes, meaning there is a shortfall by some 23 family dwellings. Viability testing undertaken has demonstrated that provision of a greater proportion of family sized dwellings, in excess of the level proposed, which has a lower value £ per sq ft, would then further decrease the overall scheme viability (evidenced through sensitivity testing undertaken) and negatively impact the scheme's ability to support the current level of affordable housing proposed (as set out in the sub section below).

60. It is acknowledged the level of family housing proposed is below the target level set out in policy BH6, however the family sized units are significantly weighted towards affordable tenure homes (helping to

address an acute housing need), and when viewed in the context of the wider viability considerations set out below, alongside other competing site requirements and in the overall scheme context this shortfall is considered acceptable on balance.

Housing Mix:

61. Overall, across all tenures, the proposed C3 housing mix is set out below;

(Table 1.0)

Unit type	Homes No.	Percentage	Habitable Room No.	Percentage
Studio	11	2%	11	1%
1 bedroom	139	30%	278	20%
2 bedroom	221	48%	663	49%
3 bedroom	93	20%	406	30%
Total	**464**	**100%**	**1, 358**	**100%**

Affordable Housing:

62. London Plan affordable housing policy (Policies H4, H5 and H6) sets out the Mayor's commitment to delivering 'genuinely affordable' housing and requires the following split of affordable housing provision to be applied to development proposals: a minimum of 30% low cost rented homes, allocated according to need and for Londoners on low incomes (Social Rent or London Affordable Rent); a minimum of 30% intermediate products; 40% to be determined by the borough based on identified need.

63. Policy H5 confirms that to satisfy the fast-track route, the development should be delivering a minimum of 35% affordable housing on-site and should be consistent with the relevant tenure split. Development which does not deliver these requirements will not be considered fast-track compliant and will be subject of viability testing.

64. Brent Local Plan policy BH5 (Affordable housing) confirms that 70% of homes should be Social Rent or London Affordable Rent whilst 30% should be intermediate, thus confirming that the 40% set by the borough should be one of these low-cost rental products.

65. With specific reference to LSPBSL schemes, London Plan policy H16 states that all schemes are required to follow the viability tested route and the policy seeks a cash in-lieu payment towards affordable housing off site that is equivalent to 35% of the units (50% on public sector land or industrial land), not on-site provision. However, the Mayor's draft Affordable Housing LPG (2023) sets out that whilst the primary policy requirement is for a cash in lieu payment, on-site C3 affordable homes can be provided on site, with provision based on total internal floorspace. To calculate the proportion of on site affordable housing, the relevant threshold level (i.e. 35% in this case) is applied as a proportion of total co-living net internal area (NIA), including shared and communal facilities within the scheme.

66. The co-living building has an overall NIA of 8, 988sqm, of which 20% is 1,798sqm. The average area of a C3 dwelling in the scheme is 67.4sqm, which equates to 27 dwellings. This number of units is then converted into a habitable room count, which equates to 78 habitable rooms. This means that 78 habitable rooms of the C3 affordable housing can be considered equivalent to 20% affordable housing for the co-living building.

67. In accordance with London Plan policy H16, and the draft Affordable Housing LPG the developments combined affordable housing offer includes affordable housing drawn from the co-living component. The applicant has elected to make on-site provision rather than an in-lieu payment for off site provision, which as noted above is permissible. The proposed combined 20% affordable housing offer by habitable rooms equates to 88 C3 dwellings and is enabled through the provision of the co-living units in building A, which in this location generates significantly greater values (£psf) than traditional C3 market residential. Noting that the proposed combined affordable housing is less than the 35% threshold the scheme has been subject to rigorous viability testing, which identifies there is a viability deficit, as discussed below. As part of this testing, for robustness the applicant was asked to demonstrate the financial benefit provided by the co-living element, within the overall proposed development, and its subsequent impact on the affordable housing offer. To consider this an assessment was made based on a scheme with no co-living homes and just C3 dwellings. The results show that an all C3 dwelling scheme without any affordable housing would result in profit return deficit of -5.38%, which is still less viable than the proposed scheme

(including co-living homes) at 20% affordable housing, as discussed below. The co-living use therefore positively contributes to a greater overall proportion of affordable housing on site than would otherwise be the case with an all C3 residential scheme. Whilst this approach is not fully in accordance with policy H16, it is permissible through the aforementioned Mayor's draft guidance, and the increased delivery of affordable housing on site, which this route enables, is considered to represent a public benefit that outweighs the very limited harm associated with the absence of a payment in lieu.

68. The proposed approach is acceptable, in principle, and is supported at a strategic level, as confirmed by the GLA. However, the overall affordable provision at 20% (by habitable room) is still short of the threshold level (35%). A site specific Financial Viability Assessment (FVA) has been submitted to test the maximum level of affordable housing (and other financial obligations) that the proposals can viably support. The proposed development will provide 88 affordable units of which 60 are London Affordable Rent (LAR) homes and 28 are intermediate, provided as Shared Ownership, as set out in the table below. This results in a BH5 compliant policy split in favour of LAR (i.e. Low cost rent), in accordance with the Council's affordable housing policies and housing needs.

(Table 1.1)

Unit Size	Private Homes	Private Habitable Room	London Rent Homes	London Rent Habitable Room	Affordable Homes	Affordable Habitable Room
Studio	11 (3%)	11	0	0	0	0
1 Bedroom	130 (35%)	260	7 (11%)	14	2 (8%)	4
2 Bedroom	204 (54%)	612	4 (7%)	12	13 (46%)	39
3 Bedroom	31 (8%)	124	49 (82%)	221	13 (46%)	61
Total	376	1007	60	247	28	104
Tenure %	81%	74%	13%	18%	6%	8%

69. This proposed combined affordable housing provision has taken into account both the C3 residential and the co-living NIA and is the equivalent of 20% of the C3 residential component on a habitable room basis (272 habitable rooms), and 20% NIA of the co-living homes on a habitable room basis (78 habitable rooms). This combined provision will deliver 350 affordable habitable rooms of C3 affordable housing to provide 20% and therefore the overall affordable housing offer is equivalent to 20% affordable housing, split 70/30 in favour of low cost rent. As a proportion of the C3 tenure only, 350 affordable habitable rooms equates to 26% affordable housing (by habitable room). This shortfall has been justified by the applicant on grounds of development viability. The applicant has stated that a number of contributing factors and the cumulative effects of these have negatively affected development viability, most notably, increased construction costs and inflation, higher debt costs and changes in residential yields and less disposal income have reduced investor appetite for investment-based assets. The applicants initial FVA concluded that the scheme would be in a profit return deficit of -10.47% of GDV against the blended target profit of 17.24% of GDV, therefore the affordable housing offer of 20% is in excess of the maximum amount shown to be viable. BNP Paribas (BNPP), instructed by the Council to independently review the applicants FVA, initially concluded the proposed scheme instead had a surplus of 4.21% (equating to c.£14.5m) over and above a required profit return of 15.75% of GDV, and raised several areas of difference, including (but not limited to) co-living GDV, build costs, finance costs and benchmark land value (BLV).

70. Further rebuttal responses have been provided by consultants DS2 (on behalf of the applicant) and BNPP (on behalf of the Council), and these subsequent discussions between the respective viability consultants have clarified a number of assumptions made, lead to agreement being reached on areas of difference (i.e. build costs) and sensitivity tests have been carried out on a number of key parameters, including residential and commercial rental values, finance rates and construction costs. Following this exercise, BNPP has concluded that the scheme would now experience a deficit of c.-£12.2m (assuming 3.8% purchasers costs), which equates to a profit return deficit of -3.62%, increasing to a deficit of c.-£15.9m (if assuming 6.8% purchasers costs), which although is different to the level of deficit

calculated by the applicants, is never the less still a deficit and demonstrates that the proposed combined affordable housing offer (20% by habitable room) is in excess of the maximum reasonable amount that can be viably delivered on the site. Both parties are in agreement on this conclusion.

71. On a residual land vale (RLV) basis BNPP conclude the following deficits;

Assumed purchasers costs for co-living	Residual Land Value	Benchmark Land Value	Deficit
3.8%	£11,590,000	£19,274,000	**£7,684,000**
6.8%	£9,280,000	£19,274,000	**£9,994,000**

72. The GLA's own viability review initially concluded (May 2024) differences in respect of a number of inputs / assumptions adopted in the applicants FVA, including, but not limited to, C3 sales values, purchaser's costs, finance rates and development yields and a number of further items of information were requested. At that time the GLA did not conclude that the proposed affordable housing offer represented the maximum reasonable amount.

73. Subsequent discussions between the applicant's viability consultant and the GLA's viability team have resulted in the GLA also concluding (September 2024), that whilst some differences remain in relation to certain inputs / assumptions, the proposed combined affordable housing offer of 20% by habitable room is providing in excess of the maximum reasonable amount of affordable housing that can viably be supported by the scheme on a current day basis. Subject to, appropriate review mechanisms being secured in the s106 agreement, and drafted in consultation with the GLA.

74. On this basis, the 20% affordable housing offer by habitable room (= 88 affordable homes) is considered to represent in excess of the maximum reasonable level of affordable housing on the site at this time, and therefore accords with Policy BH5 of the Local Plan and Policies H5 and H6 of the London Plan. The viability of the scheme, as well as alternative development scenarios, has been tested in its entirety with the surplus generated by the co-living elements of the scheme feeding into whole-scheme viability (and therefore the amount of traditional affordable housing being delivered within the development). It is acknowledged, the enhanced value attached to the proposed co-living building is responsible for the amount of affordable housing being proposed. The payment in lieu towards off site affordable housing that would otherwise be generated from the co-living element has not been tested in isolation. However, it is considered that the delivery of additional on-site affordable housing is a significant public benefit of the development. The inclusion of the co-living element of the scheme improves overall scheme viability and therefore increases the proportion of traditional affordable housing to be delivered, which is supported by officers.

75. A section 106 agreement will be entered into to secure this affordable housing in perpetuity, and will also secure suitably timed / early and late stage reviews to ensure further affordable housing can be captured if possible within the development process.

Design, scale and appearance considerations (including townscape and heritage)

76. London Plan policy D3 sets out a design-led approach to new development that responds positively to local context and optimises the site's capacity for growth by seeking development of the most appropriate form and land use. Policy D4 expects that proposals referable to the Mayor must have undergone at least one design review, to which this development has been subject to separate design reviews, while policy D5 seeks inclusive design without disabling barriers. Policy D9 sets out a framework for assessing proposals involving tall buildings including their visual impact, functional impact and environmental impact. The policy requires proposals to be justified with reference to existing and proposed long range, mid-range and immediate views, to demonstrate the impact of the proposal upon the surrounding streetscape.

77. Brent's Local Plan policy BD1 seeks the highest quality of architectural and urban design, whilst policy BD2 directs tall buildings (defined as those of over 30m in height) towards designated Tall Building Zones and expects these to be of the highest architectural quality.

Layout:

78. The proposed development is laid out as six defined buildings ranging in height between 2 and 29 storeys, as well as a single storey workspace building. The buildings are located on both sides of Atlip

Road, which is running through the centre of the site.

79. Building A frontage is onto Ealing Road and the junction with Atlip Road. This is an L-shaped point building that will accommodate all of the co-living homes (421 total) with a commercial unit at ground floor, directly addressing Ealing Road. The commercial unit will provide activation and responds accordingly with the site allocation requirements. This unit will deliver 237sqm of flexible floorspace operating under Class E (excluding sub use B) and it is envisaged at this time the unit will be taken up by the co-living operator and operated as a workshop / coffee space.

80. Residential access to building A will be from Atlip Road, helping to activate the junction with Ealing Road. A new public route and piece of public realm is to be created between this building and the existing railway arches, providing improved permeability as well as potentially facilitating a future connection through the arches

81. Buildings B1 and B2, located directly south of building A will accommodate the majority of private tenure homes (Class C3) proposed. Building B1 is the taller of the two, with lower shoulder heights proposed for both buildings. Both buildings are connected by a first floor podium which will provide useable areas of communal amenity, and a four storey (+ podium) link building that forms part of the western elevation. They both front onto Atlip Road and the new central green space proposed on the opposite side of the road, and the inclusion of entrance lobbies to each block will help to activate the streetscape.

82. Buildings C1 and C2 are located towards the eastern edge of the site where there is a more sensitive residential context along Sunleigh Road. Consequently, the overall height and massing of these blocks steps down in response to this, and are significantly lower than buildings A, B1 and B2.

83. Building C1 is proposed as mixed tenure block, accommodating both private and shared ownership dwellings, whilst C2 will accommodate all LAR tenure dwellings.

84. Buildings C1 and C2 are sited either side of the new central green space proposed at the heart of the site. Lobby access to both buildings is to be provided via this space. This arrangement should ensure that the central public space is well activated (day and night) and that it is well overlooked by those dwellings that face onto this space, of which there is a large number.

85. Both buildings will be provided with external communal amenity space in the form of roof terraces at level four. These are set back within the site and a form of edge barrier will be provided to prevent direct overlooking of residential properties to the east, along Sunleigh Road.

86. A new standalone community centre (building D1) is proposed, located between C1 and C2 facing onto the new central green space. This is designed as a lower scale two-storey building which responds to the residential context along Sunleigh Road. It will accommodate a wide range of different uses, both day and night, further activating the central green space.

87. Building D2 comprises single storey workspace units (to be constructed of repurposed shipping containers to ensure low environmental impact). This will be located in the underutilised narrow strip of land in the north-eastern corner of the site and it is envisaged will provide an attractive space for the local South Asian master tailors and jewellery industry. Secure access will be provided from Ealing Road and movement between this part of the site and the wider development is to be controlled.

Public Realm and open space:

88. At the heart of the development is a new central green space (‘Atlip Gardens’) that will be publicly accessible. This space (c. 682sqm) will provide opportunities for rest, play and public events to be held. The new community centre fronts onto this space directly.

89. A new pedestrian route from Alperton Station to Atlip Road (‘Atlip Mews’), is a new piece of public realm alongside the railway arches. This route is to be activated at ground floor via the ground floor uses, and the co-living gym on the floor above, in building A. Further along this route the space widens in between buildings A and B1, this public space will have informal landscaping and seating.

90. Atlip Road will also be enhanced with new green infrastructure. It will be tree lined in places, with continuous footways, swales and incidental play on the way features envisaged. Currently Atlip Road provides a poor pedestrian environment, so these improvements are welcomed and will be a public benefit. Furthermore, these improvements will lead to improved pedestrian and cyclist access to and

from the Grand Union Canal footbridge, at the southern end of Atlip Road, and for those also using Atlip Road to get to and from Alperton Station.

91. The layout and spaces proposed around the buildings will create a legible, safe and green pedestrian movement network, ensuring the public realm and publicly accessible open spaces are all well connected. The proposed landscaping works to the central section of Atlip Road carriageway will facilitate safe pedestrian movement across the site as a whole. Overall, the public realm proposals represent a significant betterment when compared to the existing site conditions and poor public realm offer and are found to be very well considered.

Tall buildings, height, scale and massing:

92. Policy D9 of the London Plan states that tall buildings should only be developed in locations identified as suitable in development plans. Policy D9 further states that Development Plans' definition for a tall building should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. Notwithstanding a site's potential for the location of a tall building, its visual, functional, environmental, and cumulative impacts must be assessed in line with Policy D9 (c). Policy BD2 of the Brent Local Plan considers tall buildings as over 30 metres in height.

93. The site is located within a designated Tall Building Zone (TBZ), as reflected in the site allocation policy, which states, *"located within a Tall Buildings Zone, the site is appropriate for high-density development including tall buildings in part however, any redevelopment must provide a comfortable relationship with adjacent residential development and the two storey properties along Sunleigh Road."*

94. The proposed development includes buildings up to 29-storeys in height (and + 30m), which meets the definition of a tall building in line with policy D9 and local policy BD2. The proposal has been accompanied by an assessment of the scheme against the criteria set out within the London Plan Tall Buildings Policy (D9), and this should be read in conjunction with the detailed Built Heritage, Townscape and Visual Impact Assessment (BHTVIA) which comprises Volume II of the Environmental Statement.

95. The overall massing strategy has been developed as a result of an iterative design process which involved testing a number of different massing options through the design review process. The taller buildings, A, B1 and B2 (all + 20 storeys) define street edges of Ealing Road and Atlip Road, heights then step down significantly towards Sunleigh Road. The building hierarchy responds well to the existing and emerging tall building cluster around Alperton Station and the more sensitive surroundings to the east.

96. It is considered appropriate both in terms of townscape response and mitigation of impacts to place the taller buildings towards the railway arches and the centre of the site. Stepping down of heights towards existing flatted developments to the south (Bigler Court and Dawson Court) and towards the low rise residential context to the east along Sunleigh Road is well considered, responding to the site allocation policy design principles requirements. The overall massing strategy is in keeping with the changing context in this part of Alperton, and is supported, subject to detailed consideration of amenity and environmental impacts (as discussed later on in this report).

97. The proposed approach to building heights is as follows;

    Building A: 23 storeys

    Building B1: 29 storeys (123.665 AOD)

    Building B2: 20 storeys

    Building C1: 8 storeys

    Building C2: 10 storeys

    Building D1: 2 storeys

    Building D2: single storey

98. Building B1, which is the tallest proposed is marginally below the highest building to be provided on the (former) Alperton Bus Depot site, which is approved at 124.475 AOD. This does exceed the 85m height threshold that applies to the TBZ, though that has already been accepted for the bus depot site, and furthermore the high quality design proposed and considered arrangement of height around the site in order to mitigate impacts allow this to be considered acceptable. Furthermore, the proposals will reinforce

the existing and emerging cluster of tall buildings around Alperton Station, responding in a way that is in keeping with the changing townscape and urban context.

99. To give some context the extracts below illustrate how these proposed heights are arranged across the site;

Visual impacts:

100. The BHTVIA provides a detailed assessment of the impact of the proposals on heritage, townscape and visual receptors. The heritage assessment contained within the BHTVIA is carried out in accordance with the Historic England guidance document 'Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2017)'. The townscape and visual impact assessment has been carried out in accordance with the 'Guidelines for Landscape and Visual Impact Assessment, Third Edition'.

101. The BHTVIA identifies a series of different townscape character areas (TCA's), the application site is located within the Alperton Central Industrial / Tall Building Zone area. This is currently an area that has already seen significant redevelopment of sites in line with the TBZ designation, with further tall building development forthcoming. The areas townscape value is assessed to be medium and this area will be directly affected by the proposed development, which is evident from viewpoints 6, 16, 17, 19, 20, 22 and 23 in the assessment.

102. Other character areas (2-9 below) nearby will also be directly and indirectly affected due to the scale of the proposals. The townscape value of these areas has been assessed to range between very low, low and medium value, and further assessment undertaken where stated below.

103. In summary the townscape receptor baseline is set in the following table (1.2);

Map Ref	**Townscape Character Area**	**Townscape Value**	**Full Assessment Required?**
1	Alperton Central Industrial / Tall Building Zone	Medium	Yes
2	East Alperton Inter-war residential	Low	Yes
3	South Alperton Residential	Low	Yes
4	Alperton London Underground Station and Ealing Road commercial	Low	Yes
5	One Tree Hill residential / Sudbury Golf Club	Medium	Yes
6	Wembley Intercity Depot	Very low	No
7	North Circular Industrial / Retail Estate	Very low	No
8	Hangar Lane Industrial / Retail Estate	Very low	No
9	Perivale Residential	Low	No

104. Overall, the proposals are considered to make a positive contribution (moderate beneficial) to the townscape character of TCA 1 (which includes the application site). The reasons for this include;

- It will reinforce the centre of Alperton, aiding wayfinding.
- It will complement the existing cluster of tall buildings in the centre of Alperton, contributing to the visual variety and composition in terms of height and massing.
- It will deliver public realm improvements as a result of development.
- Proposals will improve pedestrian movement and increase permeability through the site

105. Located directly to the north east of the site character area TC2 is dominated by low-scale residential development. Tall buildings and development of scale are not a feature of this area, however, its wider setting is already characterised by buildings of this type. The site allocation states that proposals must provide a comfortable relationship with this adjacent lower rise area, and the massing of the development has been stepped in response to this. The visual impacts of the proposed development on this character area are evident in viewpoints 9 and 22 in particular, which show the contrast in character and scale. The proposals would have a minor to moderate adverse effect on TCA2, due to the increased height and massing in direct proximity.

106. TCA3, to the south of the site is characterised by low-rise housing development, interspersed by green spaces and the railway. From viewpoints 7, 8, 16, 17 and 26 the proposals will be seen within an already established context of tall buildings that mark the centre of Alperton, reinforcing this character and acting as a marker for Alperton Station. The buildings will be read as a contained cluster, and for the reasons set out, townscape impacts by virtue of height and massing will be limited. It is assessed that the likely effect would be minor beneficial.

107. TCA4 comprises the commercial centre of Alperton, and includes Alperton Station opposite the site. In some parts of the character area the visual impact will be pronounced, owing to the proposed heights of buildings A, B1 and B2, and most pronounced in views further north along Ealing Road (for example viewpoint 15). As above, the development will be experienced in the context of the existing and emerging tall building cluster, which provides precedent. The composition of individual buildings A, B1 and B2 appear attractive, well-proportioned and slender in views from Ealing Road. Building set backs incorporated assist in how the buildings are viewed. The likely effect is judged to be minor to moderate beneficial, with beneficial effects arising from the improved architecture, landscaping, public realm and connectivity.

108. TCA5 comprises low-rise residential development, mostly to the north of Ealing Road, and interspersed with open spaces. There will be some intervisibility with the proposed development due to changes in topography within the character area. Viewpoints 3 and 15 are representative of where the proposal will be most visible and where the greatest magnitude of visual impact on the townscape character will be. As with the above TCA's, the proposals will be seen very much as part of the established tall building cluster at the centre of Alperton. Contrasting materials and the use of colour will help ensure the buildings do not appear to merge with one another, and the greater impacts will generally be experienced from locations where the topography is raised. The likely effect on the character area is judged to be negligible to beneficial.

109. Cumulative developments relative to the site have been considered, these further contribute to the tall building cluster in the centre of Alperton and the effects of the proposed development generally remain the same in the cumulative scenario.

110. The likely effects of the development on visual receptors has taken into account a total of 26 different viewpoints. These are included in the BHTVIA to assess the visual impacts of the proposal, comprising long distance, mid-range and immediate views. These viewpoints were agreed with Officers prior to submission, are considered appropriate and provide a robust assessment of the nature of change to be expected as a result of development. The list of viewpoints is provided below (table 1.3);

1	Stanley Avenue	2	Kathleen Avenue
3	One Tree Hill Recreation Ground	4	Alperton Cemetery
5	Grand Union Canal	6	Junction of Ealing Road
7	Alperton Sports Ground	8	Abbey Avenue

9	Woodside Close	10	Lyon Park Primary School playing fields
11	Mount Pleasant Open Space	12	Twyford Abbey driveway
13	Sudbury Golf Club	14	Mount Pleasant / Ealing Road
15	Alperton Baptist Church	16	Regents Canal southeast
17	Regents Canal southeast 2	18	Regents Canal east
19	Regents Canal southwest	20	Regents Canal Venice House
21	Alperton Station Approach	22	Sunleigh Road
23	Atlip Road	24*	Hanger Lane Station
25*	Horsenden Hill	26	Junction of Ealing Road / Alperton Lane

**out of borough locations*

111. Viewpoint 25 (Horsenden Hill) is a designated protected Local Plan view (policy BHC2), and is located c.2.5km west of the site boundary, out of the Borough. This protection is principally to preserve the skyline silhouette of the National Stadium. The development would appear adjacent to Minavil House and of a similar scale and its effects would be similar to the existing baseline scenario, and not significant. In the cumulative scenario the proposal would be seen as part of a more expansive cluster of tall buildings.

112. Overall, the BHTVIA concludes that in the completed development scenario there would be a range of beneficial townscape effects, varying in magnitude from minor, minor to moderate and moderate. This can be attributed to the reasons already discussed, including, high quality contextual scheme and high quality architecture, visual interest, improved wayfinding, reinforcing the centre of Alperton and the existing tall building cluster, provision of new public realm and enhanced permeability / pedestrian experience.

113. It is also recognised that for the identified visual receptors, whilst the effects will largely be beneficial to varying degrees of magnitude, there would be moderate adverse effects to residents in surrounding low-rise residential areas. This is due to the contrasting change in height and scale, and the resulting townscape harm will need to be weighed against the wider planning benefits of the proposal.

Functional impacts;

114. The proposed layout of uses and their integration with the surrounding area will enhance the overall character and amenity of the area, and strengthen the frontage onto Ealing Road The internal layout of the co-living block (building A) appears functional and efficient, with on-site amenities well dispersed throughout. The proposed affordable blocks are tenure blind and will deliver high quality living accommodation.

115. Entrances, generous lobbies and access routes / points are clear and legible, and the development would assist in improving the function of the public realm and help to create a safer pedestrian friendly environment and the buildings are safe and secure in terms of their health and safety strategies (i.e. Fire safety).

116. Considerations in relation to transport impacts, fire safety, jobs, telecommunications and potential effects on solar glare (adjoining development) are considered in greater detail within the respective sections of this report.

Environmental impacts;

117. The submitted Environmental Statement and accompanying technical reports (including those relating to energy, sustainability, daylight / sunlight, air quality, ecology, flooding, wind, and noise) provide a detailed and robust consideration of the relevant environmental considerations. There will be some harmful effects, for example in relation to daylight / sunlight effects on surrounding sensitive receptors, which is to be expected for a dense form of development in a built up urban context, but more generally these technical considerations confirm that the environmental impacts from the proposed development are all compliant with local and national guidance and so the development is overall acceptable with regards to its environmental impact. These material considerations are considered in greater detail within the respective sections of this report, including whether any additional mitigation measures are necessary to address impacts identified.

Cumulative impacts;

118. As referred above, the proposed height and scale are consistent with the emerging context in the

centre of Alperton, which is characterised by a range of tall buildings within this changing urban context. The proposed buildings would reinforce this emerging tall building cluster and nearby cumulative schemes have been considered appropriately throughout when assessing potential impacts (i.e. within the BHTVIA).

HERITAGE CONSIDERATIONS:

Policy background

119. Section 72(1) of the Planning (Listed Building and Conservation Area) Act 1990 (as amended) requires that with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of the area. Furthermore, paragraph 202 of the NPPF recognises that heritage assets are an irreplaceable resource and seeks to conserve them in a manner appropriate significance. It is appropriate to consider the desirability of new development making a positive contribution to the local character and distinctiveness. This is reflected in Local Plan Policy BHC1.

120. The first step is for the decision-maker to consider each of the designated heritage assets, which would be affected by the proposed development in turn and assess whether the proposed development would result in any harm to the significance of such an asset.

121. The assessment of the nature and extent of harm to a designated heritage asset is a matter for the planning judgement of the decision-maker, looking at the facts of a particular case and taking into account the importance of the asset in question. Proposals that are in themselves minor could conceivably cause substantial harm, depending on the specific context, or when viewed against the cumulative backdrop of earlier changes affecting the asset or its setting. Even minimal harm to the value of a designated heritage asset should be placed within the category of less than substantial harm.

122. The NPPF (paragraph 213) states that any harm to, or loss of, the significance of a designated heritage asset requires "clear and convincing justification". The NPPF expands on this by providing (paragraph 214) that planning permission should be refused where substantial harm or total loss of a designated heritage asset would occur, unless this is necessary to achieve substantial public benefits that outweigh that harm or loss, or unless all the four tests set out in paragraph 214 are satisfied in a case where the nature of the asset prevents all reasonable uses of the site. Where less than substantial harm arises, paragraph 215 of the NPPF directs the decision-maker to weigh this against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

123. In terms of what constitutes a public benefit, this can be anything that delivers economic, social or environmental objectives, which are the three overarching objectives of the planning system according to the NPPF. The Planning Practice Guidance advises that "public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit". The degree of weight to attach to any particular public benefit is a matter for the decision-maker, having regard to factors such as the nature and extent of the benefit and the likelihood of the benefit being enjoyed. Different benefits may attract different amounts of weight.

124. The decision-maker is directed therefore by the NPPF to balance any harm to the significance of a designated heritage asset against the public benefits that flow from the proposal by considering in the case of less than substantial harm whether this harm is outweighed by the public benefits of the proposal, or in the case of substantial harm whether the tests in paragraph 214 of the NPPF are met. Importantly, these balancing exercises are not simple unweighted exercises in which the decision-maker is free to give the harm whatever degree of weight they wish.

125. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the decision-maker to have "special regard" to the desirability of preserving a listed building or its setting. In Barnwell Manor the Court of Appeal identified that the decision-maker needed to give "considerable importance and weight" to any finding of likely harm to a listed building or its setting in order properly to perform the section 66 duty. In the case of conservation areas, the parallel duty under section 72 of the same Act is to pay "special attention" to the desirability of preserving or enhancing the character or appearance of the conservation area. The courts have held that 'preserving' in this context means 'doing no harm'.

126. The NPPF at paragraph 212 provides that "great weight" should be given to the "conservation" of a designated heritage asset, and that "the more important the asset, the greater the weight should be". The High Court in Field Forge explained that "it does not mean that the weight the authority should give to harm which it considers would be limited or less than substantial must be the same as the weight it might give to harm which would be substantial. But it is to recognize, as the Court of Appeal emphasized in Barnwell, that a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted. The presumption is a statutory one. It is not irrebuttable. It can be outweighed by material considerations powerful enough to do so. But an authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering".

127. In Bramshill, the Court of Appeal (endorsing the Court's earlier decision in Palmer) observed that "the imperative of giving "considerable weight" to harm to the setting of a listed building does not mean that the weight to be given to the desirability of preserving it or its setting is "uniform". That would depend on the "extent of the assessed harm and the heritage value of the asset in question". These are questions for the decision-maker, heeding the basic principles in the case law."

128. It is important also to note that as the Court of Appeal stated in Bramshill (which concerned a listed building) "one must not forget that the balancing exercise under the policies in […] the NPPF is not the whole decision-making process on an application for planning permission, only part of it. The whole process must be carried out within the parameters set by the statutory scheme, including those under section 38(6) of the Planning and Compulsory Purchase Act 2004 […] and section 70(2) of the 1990 Act, as well as the duty under section 66(1) of the Listed Buildings Act. In that broader balancing exercise, every element of harm and benefit must be given due weight by the decision-maker as material considerations, and the decision made in accordance with the development plan unless material considerations indicate otherwise…".

129. Where the significance of more than one designated heritage asset would be harmed by the proposed development, the decision-maker needs to account for the individual harms and to consider the level of harm arising when the assets are considered cumulatively.

130. As regards non-designated heritage assets, these are buildings, monuments, sites, places, areas, or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets. For the most part, non-designated heritage assets will have been included on the Council's Local List, but it is not necessary for an asset to be included on the Local List in order for it to be treated as a non-designated heritage asset.

131. If there is harm to the significance of a non-designated heritage asset, paragraph 216 of the NPPF requires the decision-maker to arrive at a balanced judgement, having regard to the scale of any harm or loss and the significance of the heritage asset.

132. What follows is an officer assessment of the extent of harm which would result from the proposed development to any designated and non-designated heritage assets that have been identified in the submitted BHTVIA as potentially affected by the proposed development.

Heritage Assessment:

133. The site is not within (or near to) a Conservation Area, and it does not contain any Listed Buildings. It is opposite Alperton Underground Station which is contained on the Council's Local List (non-designated heritage asset). In terms of significance, it is considered a key landmark building in the area and is considered to have a high level of architectural and historic significance. No's 2 and 4 Stanley Avenue are also locally listed but located further away.

134. The built heritage assessment (contained within the BHTVIA) identifies four designated assets within the 1km study area. There are a further three non-designated assets within 500km of the site. The value of each of these assets contribute to the built heritage baseline, and any potential heritage effects, are appropriately considered within the detailed assessment.

135. The designated heritage assets (within 1km) are;

- *Church of St Mary (Grade II Listed):* Garden wall to the north of Twyford Abbey (Grade II Listed) and Twyford Abbey (Grade II Listed) – its heritage value is high. This group of listed buildings share a group value, but are almost 900m southeast of the site, a significant distance. There is not intervisibility and the application site does not contribute to the heritage value of the listed buildings.

- *Canalside Conservation Area* (within Ealing Borough) is considered to be of medium heritage value. The application site is over 400m to the east of this, there is no intervisibility at present and the application site does not contribute to the heritage value of the receptor.

136. The three non-designated heritage assets (within 500m) are;

- *Alperton London Underground Station*: This is locally listed and is a modernist brick building designed by renowned Charles Henry Holden. The building is characterised by modernist features, red brick, concrete and glass (crittal window features) – its heritage value is low. The buildings setting is mixed given its location in the centre of Alperton, the station concourse in front is where the building is best experienced and from the approach from the east along Ealing Road. The building is experienced within the emerging wider context of tall buildings around the Station. The application site is directly opposite the Station, to the south, and the Atlip Centre which is proposed to be demolished does not contribute to the heritage value of the site.

- *No's 2-4 Stanley Avenue and 1-3 Stanley Avenue*: No's 2-4 are a pair of Arts and Crafts houses built in 1888 and 1-3 a pair of decorative Victorian cottages dating back to c.1860. These are recognised for their historic and architectural interest – their heritage value is low. Whilst there is potential intervisibility the application site does not contribute to their heritage value.

137. Full assessment of each of these aforementioned designated and non-designated assets has been carried out (contained within section 9.0 of the BHTVIA). The findings of this assessment are considered in the following paragraphs.

138. During demolition and construction phase some limited temporary views of construction equipment could be expected to be experienced from these assets. In the case of the listed buildings and the Conservation Area the magnitude of effect would be nil. Given the proximity of Alperton Station and this being directly opposite this phase of development would result in some temporary adverse environmental impacts, given this would be temporary only it is judged to result in a very low magnitude of impact on the receptor (negligible adverse effect). The same judgement is reached for No's 2-4 Stanley Avenue, and no visual or environmental impact adjudged for No's 1-3 Stanley Avenue.

139. With regards to the operational phase, the setting of the group of listed buildings has already undergone substantial change and their wider setting does not contribute to their value. There would be glimpsed intervisibility (evident from viewpoint 12 in the BHTVIA) and it is judged that the magnitude of impact on the heritage value of the receptor is nil. The likely effect is therefore none.

140. At operational phase, for Canalside Conservation Area, its wider setting does not contribute to its heritage value. There would be intervisibility between the development and northeast part of the Conservation Area, and this is tested through the views assessment (see viewpoint 5), which illustrates visibility will be during winter months. The magnitude of impact on the heritage value is judged to be nil. The likely effect is therefore none.

141. For Alperton Station (locally listed) it is surrounded by a mix of predominantly commercial development, of mid to high scale and density. Its setting does not contribute to its heritage value and its setting is already characterised by a number of tall buildings (with the former bus depot development emerging immediately adjacent also). The application site at present does not make a positive contribution to the setting of this receptor. There would be an increase in height directly opposite the Station, however, tall buildings and buildings of scale nearby already form a key feature of the Station buildings setting. The magnitude of impact on the receptor is judged to be very low, due to marked change in the immediate setting of the receptor. The likely effect is judged to be negligible beneficial.

142. For No's 2-4 Stanley Avenue, once complete the development would be partially visible (evident in viewpoint 2 in the BHTVIA). The magnitude of impact on the receptor is judged to be very low. The likely effect is judged to be negligible neutral. For No's 1-3 Stanley Avenue, there would be visibility, as seen through viewpoint 1, though this would be as part of the tall buildings cluster around Alperton Station. The magnitude of impact on the receptor is judged to be nil. The likely effect is therefore none.

143. The cumulative context is also considered within the submitted Environmental Statement (and BHTVIA), which provides a robust approach to assessment. Three developments are identified as most relevant (former bus depot site, Bridgewater Road and Alperton House). These would form a cluster within the centre of Alperton, in the TBZ, and will reinforce the established character of the area. In this context the impact of the proposals would not change this. The impacts to heritage are either nil or very low given the described existing context.

144. In summary, the likely effect on the assessed receptors is judged to be none in the majority of cases, for Alperton Station the effect is judged to be negligible beneficial once the development is built and for 2-4 Stanley Avenue, negligible neutral once built.

145. The Councils Heritage and Conservation Officer has considered the assessment provided and the potential effects of the proposals on heritage assets (including non-designated). It is without doubt the Station will be impacted by the proposed development, given its proximity and scale of buildings, and that the development will be seen within its context and setting. This evident from viewpoint 6 in the BHTVIA. An additional viewpoint was also provided on request as you approach the Station from the southwest on Ealing Road. The proposal will loom adjacent to the Station, but no more so than the existing and consented tall buildings close to the Station, which are now very much part of its setting. It is judged that the Station architecture is robust and in direct contrast to the surrounding development ensuring it stands out. It is concluded that no harm is caused by the proposals on the heritage significance of the Station, a locally listed asset. It is agreed that there would be no harm to No's 2-4 Stanley Avenue. Furthermore, the development will not lead to harm to the setting of any local designated parks, Alperton Cemetery and One Tree Hill. The development proposal would not lead to any harm to the identified heritage assets, having regard to Policy HC1 of the London Plan, and Policy BHC1 of the Local Plan.

146. In the Stage 1 report the GLA find that no harm will be caused to any of the aforementioned heritage assets and note that development will alter the setting of the locally listed Station building, which has been appropriately assessed as set out above.

147. As no heritage harm has been identified, it is not necessary to consider any public benefits that would arise from the scheme to weigh against that harm. Notwithstanding, officers do consider that the proposed development would deliver the wide-ranging benefits, as discussed within the relevant section of this report, including the 'planning balance' considerations.

148. To conclude therefore, in terms of impacts on townscape and built heritage, there are no strategic concerns raised in relation to the impacts of the tall buildings proposed. These are considered appropriate for the site given its tall building and growth area designations and public transport accessibility, and are aligned with the site allocation design principles and requirements. There will be no harm caused to any nearby heritage assets (designated or non-designated).

Architecture and materiality:

149. Material choice and palette has been established to create a changing context for this part of Alperton, and has been subject to considerable engagement pre-submission, including with officers and externally with the Design Review Panel, and this included testing of alternatives.

150. The taller marker buildings (A, B1 and B2) are proposed primarily to be expressed through coloured concrete, which has been informed by the Alperton Character Study as well as the emerging urban context.

151. Building A will be constructed and finished in a light green precast concrete, helping to create a distinctive building marking the corner of Ealing Road and Atlip Road. The façade is expressed as a grid due to the repetitive nature of the internal floor layouts of the co-living studios within, and the base is expressed with a strong double height plinth. Further articulation and expression of the facades is to be achieved through horizontal bands at floor level and profiled (ribbed) columns which come all the way to ground. The amenity floors on upper levels are expressed with a different rhythm of columns and windows, and this helps to break up the elevations, giving greater visual interest. Windows are recessed to create depth and shadows.

152. Buildings B1 and B2 are very much in keeping with the architectural approach for building A, and are expressed through horizontal banding at cill level and profiled columns which come to ground also. External balconies provide an ordered and grid like façade. This will be constructed and finished in a light red precast concrete, which is a colour complementary to the brick found at Alperton Station and across the wider Metroland character. It is considered that building A (light green) and the differing tones of red

in B1 and B2 will complement one another and provide visual interest, also helping to avoid the buildings coalescing with one another in certain views.

153. Buildings C1 and C2, lower in scale are to be constructed in a light chalky grey brick which is felt will help to provide a more neutral background to the setting of the new central open space ('Atlip Gardens'), as well as the view of these buildings from the rear of houses along Sunleigh Road. It is also similar in tone to one of the buildings on the (former) bus depot site, so there is local precedent. The brickwork is proposed to be corbelled at ground floor, laid vertically in between windows, with articulated metalwork (i.e. projecting balconies), which will help give depth and articulation to the elevations. The ground floor façade onto Atlip Road has a double height expression in the form of maisonettes.

154. Entrances throughout are legible and well considered in terms of architectural detailing. For example, in places entrances are framed by ribbed columns, and recessed where appropriate to provide shelter. Main entrances to buildings B1 and B2 are set back behind a colonnade feature, which helps create a more generous public realm offering along Atlip Road, improved pedestrian route, and provides shelter and shade. For buildings C1 and C2 entrances are defined through use of red metalwork.

155. Externally, the facades are considered well-composed, with good proportions that establish a clear hierarchy across the scheme, defining clear bases, bodies and crowns from ground floor to roof level. The robust base is well defined across buildings A, B1 and B2.

156. Areas at ground floor that are non-residential and which essentially provide back of house functions (i.e. refuse stores) are to be treated with articulated profiled metalwork throughout in a colour appropriate to each individual building.

157. Building D1 (the community centre) will be a bespoke standalone building, and its design is reflective of this. It is proposed to be finished in a dark red colour, with a multi-pitch roof, clad in dark red metalwork, with a vertical rhythm to it broken up by narrow windows at first floor. At ground floor this is to be predominantly glazed. A canopy is provided across the entire façade facing onto Atlip Gardens which will give shelter.

158. Building D2 (the workspace) will be a mono-pitch building clad in red metalwork. Generous windows are proposed to face onto Ealing Road, which is welcomed. This structure is to be built from shipping containers, and further details of this shall be secured by condition.

159. The GLA did encourage the applicants to consider, for building A, using earthier tones in the façade treatment, as opposed to the light green, and also suggested some interventions to create / reinforce contrast and depth to the facades. The Council's Urban design officer is of a different view to this, and strongly welcomes the proposal for building A to be in a light green tone, as this will provide welcomed contrast to the redder tones that feature more predominantly in the surrounding area.

160. Detailed bay studies provided illustrate how specific elements of the façade may be constructed, including typical windows, parapets, balconies and soffits; this gives confidence the scheme will deliver high quality and robust buildings.

161. Overall, the proposal is considered to exhibit a high level of architectural quality supported by a well-chosen, yet relatively simple palette of materials and an appropriate level of architectural detailing is evident. The different building tones proposes will give the development a clear identity and provide a suitable amount of variation within the site. The proposals are supported in urban design terms, and respond well to Local Plan policy BD1, to the extent that the scheme can be considered exemplary. To ensure that the quality of the proposal is carried through in the delivery of the scheme, the approval of final materials and key construction details is recommended to be secured through condition.

Archaeology:

162. In consultation with the Greater London Archaeological Advisory Service (GLAAS) the Council is advised that the proposal is unlikely to have a significant effect on any heritage assets of archaeological interest. No further assessment or planning conditions are found to be necessary.

Secure by Design principles:

163. Policies D1-D3 and D8 of the London Plan and the Mayor's Housing SPG apply to the design and layout of development and refer to the importance of designing out crime by applying principles such as optimising the permeability of sites, maximising active frontages and minimising inactive frontages.

Areas of public realm should be well-designed, welcoming, inclusive and benefit from natural surveillance.

164. Policy DMP1 of the Local Plan seeks to ensure that developments are safe, secure and reduces the potential for crime.

165. Though it was acknowledged that there were felt to be some encouraging features to mitigate potential for antisocial behaviour and crime, due mainly because of a lack of detailed supporting information an initial conditional objection was raised by the Designing out Crime Officer (DOCO). It was noted this objection could be addressed though if a condition is secured requiring the applicant / developer to achieve secured by design certification (which would require further consultation with the applicant at the relevant time).

166. Concerns raised by the DOCO have been reviewed and duly noted and the applicants have since met with the DOCO to discuss the proposals in light of initial concerns raised. Further feedback received from the DOCO acknowledges that the design does incorporate secured by design principles but that it still lacks in detail. The importance of ensuring controlled access from the workspaces in the north east corner through to the wider site was reiterated, so too was the need to ensure secure stair cores throughout. Details of security ratings for doors and windows should also be provided, and this could reasonably be addressed through condition. A condition is recommended to ensure that further details of the security measures to be incorporated are submitted and agreed, and to demonstrate that reasonable endeavours have been made to accommodate secure by design Silver Award principles.

Quality of accommodation

C3 dwellings proposed:

167. To improve the quality of new housing, new development must meet with or exceed the minimum internal space standards contained within the London Plan policy D6 (table 3.1) and the Mayor's Housing SPG. It goes onto say that all new homes should be provided with adequate levels of outlook, daylight and natural ventilation. Local Plan policies DMP1 and BH13 confirm that dwellings need to meet the private internal space standards set out in policy D6. The proposal should also have regard to and comply with guidance contained within Brent Design Guide SPD1.

168. All homes proposed would meet the minimum space standards and provide adequate room sizes, storage space, and access to private balconies/external space that comply with minimum standards. With respect to floor to ceiling heights, the residential minimum standard is 2.5m for at least 75% of the GIA and section drawings provided confirm that the floor to ceiling heights would satisfy this requirement.

169. Adopted policies and guidance seek to maximise dual aspect dwellings within a development, although recognising that single aspect dwellings may need to be provided when it is considered a more appropriate design response when trying to meet with the requirements for optimising site capacity (London Plan Policy D3) providing that adequate passive ventilation, daylight, privacy, and overheating avoidance can be demonstrated. All of the C3 dwellings in buildings B1 and B2 are dual aspect, and 70% in buildings C1 and C2, with opening windows in two directions which helps in terms of daylight, sunlight and cross ventilation. This results in 73% dual aspect provision overall. Generously proportioned windows and projecting balconies also will allow light to penetrate deep into all dwellings. There are no single aspect north facing units, however there would be some north-west facing single aspect units. Overall, this is considered to represent a high proportion of dual aspect homes to be provided within a dense form of development, such as this.

170. All C3 dwellings at ground floor facing onto Atlip Road (in buildings C1 and C2) are maisonettes with direct access from the street, with no sleeping accommodation on the ground floors.

171. The compact internal floor layouts allow a clear and direct relationship between the lift/stair cores and front door of the dwelling(s). Building B1 has 10 units per core however this reduces to nine as the floor plan reduces on upper floors. Given the internal circulation is subdivided into two smaller zones, the internal layout is acceptable.

172. The proximity and relationship between building B2 and the railway arches was highlighted by the GLA in its Stage 1 response, and the subsequent impact on residential amenity in terms of outlook and levels of sunlight/daylight. In consideration of this, the applicant notes the viaduct is the equivalent of

three residential storeys. Therefore, only the south-western frontage of building D2 at ground, first and second floor levels shall have an aspect onto the railway arches, affecting a limited number of dwellings, where the number of dual aspect dwellings have been maximised and/or the dwellings have been offset from the viaduct. The internal daylight and sunlight conditions for the lower level units in building D2 are reflective of the site constraints (as discussed further within the relevant section of this report). All other residential units above second floor will have an uninterrupted outlook above the viaduct.

173. Internally, the layouts are well planned and present a range of typologies (of differing sizes) that will support different ways of living for a range of different residents. Access to private amenity space (projecting balconies) is provided directly from kitchen / living / dining areas in all dwellings.

174. Overall, the proposed C3 dwellings would achieve comfortable and functional layouts which are fit for purpose and would meet the needs of future occupiers, in accordance with London Plan policy D6.

Co-living units:

175. A total of 421 no. co-living units are proposed, and these are assessed primarily against the relevant criteria in Policy H16 of the London Plan (as set out below), and also against the design quality criteria within the Mayor's LSPBSL LPG. This LPG was adopted in February 2024 and was in draft form when the co-living building was being designed.

176. Policy H16 (Large-scale purpose-built shared living) criteria are considered in turn below;

Be of good quality and design

177. All co-living units meet the required internal space standards set out in the LPG, these are not less than 18sqm and are as generous as 28sqm for some, all accessible rooms will be larger. A range of facilities and amenities are provided within the building to support a good quality of living for future residents. Good levels of daylight, sunlight, ventilation, outlook and privacy are to be achieved. In response to GLA Stage 1 queries raised it has been demonstrated that LPG standards in respect of on-site laundry room facilities, toilet provision, and storage provision are met, and where these are not the level of provision proposed has been informed through co-living operator input. Cycle storage provision of 0.75 spaces per resident is met, in accordance with the LPG, and TfL has confirmed the level of provision is acceptable.

178. Typical journey times from the co-living units to communal facilities have been demonstrated, in response to the GLA. The amenity space is intentionally provided at different levels of the building (ground, mezzanine, 8th and 22nd floors) which is to help ensure every unit within the building is in close proximity to an area of amenity space. The furthest journey time that would occur to an amenity area would be 1min 20sec based on a notional walking speed.

179. It is considered that the overall design of the building (together with the C3 blocks) would be a positive addition to the streetscene, fronting onto Ealing Road.

Contribute towards mixed and inclusive neighbourhoods

180. This type of accommodation is intended for those who cannot or prefer to not live in self-contained homes or HMOs or those households who are above the threshold for traditional social housing but are unable to afford properties on the open market or are attracted by the range and convenience of facilities provided. The facilities provided are also designed to encourage social interaction whilst also providing private space. The co-living building will deliver a new housing produce in the Alperton area and is proposed as part of a larger residential-led mixed use redevelopment of the site, and this will contribute to a mixed and inclusive neighbourhood. A new standalone community centre proposed will further facilitate an inclusive neighbourhood.

Should be located in an area well-connected to local services and employment, by walking, cycling and public transport, and its design does not contribute to car dependency

181. The site is within the centre of Alperton Growth Area and all the services and facilities therein. The site is located within an area with a high PTAL score, with Alperton Underground Station directly opposite and numerous bus routes operating in the vicinity. The scheme is car free, although limited provision for on-street blue-badge parking would be made from the outset and additional spaces could potentially be

provided when required (should demand arise in the future).

Should operate under single management

182. The application is supported by an Operational Management Plan (OMP), confirming a single professional third party operator will be appointed through a robust tender process. This Plan would be secured through the s106 agreement.

Co-living units shall all be for rent with minimum tenancy lengths of no less than three months

183. The submitted OMP, referred above, confirms that all units would have minimum tenancy lengths of no less than three months. This will be secured in the s106 agreement.

Communal facilities and services shall be provided that are sufficient to meet the requirements of the intended number of residents

184. Communal facilities and services would be provided in accordance with the criteria. These include;

- Resident host and housekeeping services
- Co-working areas, potential ground floor coffee shop (with public access), residents lounge (with library), gym / fitness suite, communal kitchens and dining facilities (291.4sqm) at level 8, screening room, games room, residents bar, parcel management services, laundry facilities and cycle storage – these are dispersed throughout the building at ground, mezzanine, 8th and 22nd floors
- A series of external terraces providing external amenity areas for residents of building A only, at levels 1 and 8, and a winter garden at level 22, delivering c. 417sqm of shared amenity space in total. This provision is in line with the LPG requirements for 410sqm, based on the quantum proposed (equating to 0.8sqm of external space per resident)
- Range of internal communal amenity areas equating to 1, 260sqm, which represents 3sqm per unit, this is based on operator input and precedent schemes. This would fall marginally short of the recommended benchmark of total internal communal amenity space (which is calculated to be 1, 342sqm), however, the quality, functionality and accessibility of the spaces is considered to be particularly high which would offset any shortfall
- On-site facilities will also include, laundry services, building concierge and housekeeping services (including linen and bedding services at additional cost to residents)

Private units shall provide adequate functional living space and layout and are not self-contained homes or capable of being used as self-contained homes

185. The co-living units are designed to provide a high-quality yet functional space with units ranging in size from 18.29sqm to 27.6 sqm. Each unit will be fully furnished with an en-suite shower room, double bed, a small kitchenette (sink and induction hob) with separate seating/homeworking space.

A management plan shall be provided with the application

186. A detailed management strategy is submitted in support of the planning application. Further details in respect of the management strategy can be conditioned requiring approval prior to occupation.

It delivers a cash in lieu contribution towards conventional C3 affordable housing, which is expected to be equivalent to 35% of the units (all LSPBSL schemes will be subject to the viability tested route, set out in London Plan policy H5)

187. The proposed development will not deliver a cash-in-lieu payment for the co-living element, and instead the applicant has proposed to deliver an equivalent of 20% NIA floorspace of the co-living block as an on-site affordable provision within the C3 tenure homes, which shall be accommodated across buildings C1 and C2. This on-site affordable housing provision via the co-living element contributes to a blended affordable housing offer of 20%, including the 20% measured by habitable room for the C3 component.

This approach has been agreed with the GLA. As the affordable level sits below the 35% Fast-Track threshold, the development has been viability tested.

188. The quality of the co-living units has also been assessed against Local Plan policy BH7, and overall compliance with the assessment criteria is achieved. Assessment of the affordable housing offer (rather than a financial payment in lieu), is considered under the 'affordable housing' section of this report.

Inclusive accommodation

189. London Plan policy D7 requires proposals to provide suitable housing and choice to cater for London's diverse population. In line with policy, 90% of the C3 dwellings (417 out of 464) will be designed to meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings', and 10% of the dwellings (47 out of 464) will be designed to meet Building Regulation requirement M4(3) 'wheelchair user dwellings'. M4(3) wheelchair user dwellings will be distributed throughout the development, and across all tenures, and 18 of these will be within the Low Cost Rent tenure.

190. With regards the co-living units, the development proposes 4.5% M4(3) accessible units (18 units) with a further 3% (13 units) designed to comply with the movement zones prescribed by M4(3) citing the lower-than-average uptake on accessible co-living units. This is not compliant with the LPG, or London Plan policies, which say schemes should provide 10% accessible units.

191. The applicant considers that the proposed level of M4(3) accessible co-living units offers the optimum number based on market advice, which is that occupation of M4(3) specification units by wheelchair users is typically lower than conventional C3 housing. If the level proposed was to be increased to 10% this would require amalgamation of two standard sized units, resulting in an overall reduction, which would impact negatively on the developments already challenging viability and affordable housing offer.

192. On balance, this level of accessible provision is considered acceptable, and prioritises the delivery of conventional C3 affordable homes.

Privacy between new homes within the development and outlook

193. As referred to within the relevant section of this report, it is considered privacy will not be compromised for future occupants, owing to the generous separation distances provided between the proposed buildings (as well as to existing neighbouring residential properties), which largely complies with SPD1 guidance, even exceeding 18m separation in some situations.

194. It follows, that future outlook from residential units will also be of an acceptable quality, owing to the layout of buildings, which includes good levels of separation across the site. As discussed elsewhere within this report, the site constraints, namely the proximity of building B2 to the viaduct results in some daylight, sunlight and outlook impacts to dwellings at the lower levels, though this is limited to second floor and below only. The units affected are generally dual aspect which helps to mitigate against this constraint, and it is important also that this is viewed in the overall context of what is being delivered across the entire site. The impact on the affected units is considered further in the sub section below.

195. Where ground floor maisonettes in buildings C1 and C2 front onto Atlip Road, these have private front gardens (1m deep), with defensible boundary treatments and opportunity for defensible planting, to safeguard privacy for future occupiers. Further details of the treatment of these spaces will be secured by condition.

Daylight and sunlight conditions within the proposed development

196. The application has been accompanied by an 'Internal Daylight and Sunlight Report' (February 2024) and this assessment has been undertaken in accordance with the current updated BRE guidance (2022), and also references the British Standard BS EN17037: 2018 'Daylight in buildings'. The assessment looks at the quality of internal amenity within the proposed development.

197. Two methodologies are applicable for assessing internal daylight amenity to new residential properties, these are known as 'Daylight Illuminance or 'Daylight Factor'. In this case Daylight Illuminance has been tested.

198. The Illuminance method involves using climatic data for the location of the site (via the use of an

appropriate, typical or average year, weather file) to calculate the illuminance from daylight at specific points within a room on at least hourly intervals across a typical year. The guidance refers to target illuminance levels that are expected to be achieved.

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

200. Provision of sunlight to open spaces around the buildings should be assessed using the 'two hours sun contour' test. For an open space to be considered well sunlit throughout the year, BRE guidance (2022) suggests that at least 50% should receive two hours of direct sunlight on 21 March.

201. The assessment undertaken has considered all proposed residential units within the development. The daylight assessment considers all habitable rooms (bedrooms, living rooms and kitchens), toilets, hallways and staircases are not considered habitable, and therefore have not been assessed.

202. A summary of the daylight illuminance results is presented in table 1.4 below;

Block	**No. of rooms assessed**	**Rooms meeting target**
Block A	421	390 (93%)
Block B	959	834 (87%)
Block C	399	283 (71%)
Total	1779	1502 (84%)

203. The results show that overall 84% (1502 rooms) of the proposed habitable rooms tested (1779) would achieve the recommended levels of daylight. Block C (buildings C1 and C2) which has the lowest level of compliance is mixed tenure, including intermediate and LAR dwellings. Overall, on a site wide basis this is considered to a high level of compliance for a scheme of this density and scale, in a built up urban location in a designated growth area, under the BRE guidance (2022).

204. Where deviations do occur, then typically this is as a result of the building design which includes overhanging or inset balconies, driven by the need to provide essential private outdoor amenity space, or site constraints (i.e. proximity to the railway arches).

205. Internal layouts have sought to be as efficient as possible, by locating living / kitchen / dining rooms on corners, where possible, so as to maximise daylight opportunities. Where deviations occur in bedrooms these are considered to be of lower sensitivity, as per the BRE guidance (2022).

206. With regards to direct sunlight, 885 units were tested. The target is for at least 1.5 hours of direct sunlight on 21 March (ideally within the main living space). In total, 471 units (53%) meet this target. All of the units that do not meet the BRE target are served by overhanging balconies, which reduces the sunlight potential of the rooms below. The level of compliance (53%) is considered to be reflective of the site context, which is characterised by dense buildings of scale.

207. Sunlight provision within the proposed gardens and amenity areas within the development has also been assessed using the BRE's two hours sun contour assessment. Eleven main amenity areas and open spaces serving the development and the three rooftop spaces serving building A have been assessed.

208. Results show that eight of the eleven amenity areas satisfy the BRE guidelines, by receiving at least 2 hours of sunlight on the 21 March. When all of the amenity space provided within the residential elements of the scheme is considered, 57% of the total space would achieve 2 hours of direct sunlight.

209. Deviations do occur in amenity spaces referred to in the assessment as areas 2 (rear of building A), 3 (rear of buildings B1 and B2) and 4 (central open space). The most significant occurring to area 3. For area 4, the mast majority of the space would receive 1.5 hours of sunlight throughout the day on 21 March, and the space has been designed to be open to the south, with views both east and west through the proposed massing. This will allow the space to receive direct sunlight at different times throughout the day during summer months, whilst also providing much needed shade at times.

210. All three external rooftop amenity areas serving building A achieve 2 hours of sunlight on 21 March to at least 50% of the space, in full compliance with BRE guidance (2022).

211. On balance, the high level of compliance demonstrated in respect of daylight illuminance results indicates daylight levels to the majority of rooms tested will be BRE compliant. Deviations do occur however, as set out above, which is to be expected in a development of this density and scale, in an already built-up urban context, and such deviations must be weighed against the public benefits in the overall planning balance.

Amenity space provision

212. Local Plan 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 would normally be expected to be 50sqm for family housing (homes with 3 or more bedrooms) at ground floor level and 20sqm for all other housing.

213. The requirement for external private amenity space established through policy BH13 is for it to be of a "sufficient size and type". This may be achieved even when the “normal expectation” of 20 or 50sqm 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 evaluating whether the amenity space offer within a development is “sufficient”, even where a shortfall exists in private and/or communal space.

214. The Councils recently adopted Residential Amenity Space & Place Quality (RASPQ) SPD confirms that where the full area requirement cannot be provided, at least part of each dwelling’s required amenity space would be private space and comply with London Plan policy as a minimum.

215. 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 1.5m. The proposed development complies with these requirements.

216. Policy D6 of the London Plan specifies that where there is no higher local standard, a minimum of 5sqm of private amenity space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant. The minimum depth and width of 1.5m is reconfirmed in the policy.

217. As advised above, policy BH13 advises that where there is a shortfall in private amenity space then additional space should be provided in the form of communal amenity space.

218. All C3 dwellings proposed (464 in total) in buildings B1, B2, C1 and C2 benefit from areas of private outdoor residential amenity space in the form of a balcony or private terrace / gardens that meet London Plan policy D6 minimum standards. Private residential amenity space will be supplemented through on-site communal amenity space in the form of courtyards and roof terraces. The amenity space breakdown for the C3 dwellings is as follows;

- 4, 0001sqm in the form of private balconies, gardens / private terraces demised to individual C3 dwellings in buildings B1, B2, C1 and C2
- 727sqm as communally accessible gardens to the rear of buildings C1 and C2 for residents in these buildings (including opportunities for growing space and play)
- 262sqm as communally accessible garden / terrace to the rear of buildings B1 and B2 for residents in these buildings
- 785sqm as communally accessible roof terrace space (accessible to respective residents in buildings B2, C1 and C2)

219. Additionally, 240sqm is to be provided as internal communal amenity space (including space on the ground floor of buildings B1 and B2), which will have some amenity value for residents in these buildings.

220. There are no balconies provided facing the railway on building B2, which is due to the proximity to the railway and the constraints this presents in respect of the operational railway which is adjacent. However, on all other elevations to this building balconies are provided, and an external communal roof terrace is

included for residents in this building.

221. The above amenity breakdown amounts to 4, 001sqm private amenity space and 5, 775sqm overall when the communal amenity space provision is also combined. This level of private provision is notably short of the 20 / 50sqm targets set out in policy BH13, which in this case equates to a required overall provision of 12, 070sqm private amenity space. But it helps that this private amenity space offer will be further supplemented by the 1, 774sqm of communal amenity space either at grade or in the form of roof terraces, plus the following high quality publicly accessible communal spaces which amount to a further 1, 154sqm of useable on-site space;

- 682sqm in Atlip Gardens, in the centre of the site which will act as a focal point for the development
- 269sqm in Atlip Mews, alongside building A
- 203sqm within the new public realm space in between buildings A and B1

222. When added to the private and communal residents only amenity space offerings this additional publicly accessible open space provision whilst not being private or communal amenity for residents only use is considered to have additional amenity value for future residents and it can be expected to play a beneficial role in mitigating the shortfall in private amenity space identified against policy BH13 targets. For example, the central open space located at the heart of the development will deliver an active and diverse space that can support a wide range of uses for future residents.

223. Brent's RASPQ SPD acknowledges that in some locations, in high density developments, meeting the overall minimum might be challenging. As such, flexibility could be allowed where it has been shown that all reasonable options for provision have been considered, and that an overall high quality of amenity space is to be provided, which is considered to be the case in respect of the proposed landscape, public realm and amenity space elements.

224. Within dense residential developments in a Growth Area setting, such as this, there is an expectation that a shortfall in private amenity space provision can acceptably be made up through communal garden space as much as is reasonably possible, which would be a secondary form of amenity space beyond the dwellings private balconies/terraces/gardens. Given the identified shortfall in private amenity space provision against the targets set out in policy BH13, a financial contribution is sought which is to be utilised towards the enhancement of existing open space / play space in the vicinity of the site. This will help mitigate against the shortfall, further details are set out below in the 'play space' discussion.

225. With regard to the co-living units, the proposed development does result in a minor shortfall with the amenity space requirements of the Large-scale Purpose-built Shared Living LPG and policy H16, the justification for this has been discussed above.

226. On balance, officers consider the proposed external amenity space offer would be of a sufficient size and type to serve a dense form of development and would also be of a good quality, whilst offering a variety of different types of external amenity space which would be to the benefit of future residents, therefore meeting the requirements of policy BH13 of the Local Plan and the RASPQ SPD.

Play space provision

227. Play space provision to cater for a range of age groups should be made in accordance with the Mayor's 'Play and Informal Recreation' SPG and Policy S4 of the London Plan, and a benchmark of 10sqm per child should be provided. The total expected child yield for the proposed C3 element of the development is calculated to be 213 children, of which 97 are under the age of 5, with 72 between 5-11 and 45 between the ages of 12-17.

228. It is proposed that;

- 967sqm of doorstep play will be provided on site for 0-4 year olds, which meets the required quantum in full
- 195sqm provided in equipped play features for 5-11 year olds will be in part provided on site, which

results in a shortfall against the required quantum by 521sqm

229. No play space is proposed to be provided on site for the 12+ age group, which would typically be expected to be provided in the form of larger areas suitable for outdoor sports (i.e. basketball), and kickabout space. It is anticipated that One Tree Hill Recreation Ground, which is within 400m+ walking distance will in part help to meet this provision.

230. The landscape proposals illustrate that some of the doorstep and equipped play space will be within publicly accessible spaces, within Atlip Gardens for example, and that some will be located within residents only communal amenity areas, to the rear of buildings C1 and C2. Residents of the affordable units in buildings C1 and C2 would benefit from good access to these spaces.

231. All doorstep play (for ages 0-4) will be within sight of residences which is good in terms of safety and surveillance, and it will cater for children with physical disabilities.

232. This level of provision overall is below the 2, 130sqm benchmark requirement, as per the GLA's population yield calculator. Due to the site constraints the amount of equipped play (for ages 5-11) cannot be provided in full, and there isn't sufficient space to feasibly meet the requirement for the 12+ older age groups requirement. If these requirements were to be met in full on site then this would require significant alterations to the site layout and an inevitable reduction to buildings footprints and the quantum of development (including the number of new homes and affordable homes). The Borough's acute housing needs are such that maximising housing delivery is prioritised over on site play features.

233. To mitigate the shortfalls in on site play features a financial contribution of £232,000 is to be secured, which is to be spent on improvements to nearby open spaces which may include improvements to the open spaces themselves, the play facilities within these open spaces and/or improvements to the routes to these spaces from the application site. Parks officers advise that One Tree Hill (within 400m walking distance), Abbey Estate Open Space, Mount Pleasant Open Space and Heather Park would all benefit from further enhancement. This contribution will enable improvements to be delivered for the public benefit of the local area. On balance, the play space strategy is considered to be acceptable, and further details of on site play features will be secured through relevant condition(s).

Fire safety

234. A Stage 2 Fire Strategy (Rev 2) has been prepared by Introba Consulting, alongside a Planning Gateway One Fire Statement. The latter is required as this is considered to be a relevant high-rise residential building (i.e. is 18m or more in height, or 7 or more storeys). These statements highlight the main fire safety principles that have been employed in the design of the development and set out a detailed strategy that has been prepared in accordance with London Plan Policies D5 and D12 and revised during the course of the application to respond to previous comments from the Health and Safety Executive (HSE).

235. Fire safe building construction, fire spread prevention, evacuation strategies, means of escape, sprinkler systems, detection methods, firefighting access, and facilities for the fire and rescue services are all set out in detail within the statements. As the residential apartments will adopt a 'stay put' policy, there is no defined assembly point for residential occupiers. Buildings A, B1, B2, C1, and C2 will be over 18m in height and therefore will be provided with a firefighting as well as a protected secondary evacuation staircase, whereas building D1 will be provided with a single protected staircase.

236. Emergency fire vehicle access will be achieved, with the Fire Statement confirming that Atlip Road will be suitable for the fire service to access all blocks, also confirmed by Transport officers.

237. The proposed firefighting strategy of the development is considered acceptable and in accordance with relevant planning policy and regulations. The HSE have responded to the most recent consultation (response received 17/05/24) and on the basis of the Stage 2 Fire Strategy (Rev 2) and updated internal layouts, raised no objection to the proposed fire strategy, confirming they are 'content' with the fire safety design aspects (para 1.4 of HSE response dated 17/05/24). The GLA has raised no objections to the fire strategy. Compliance with the Fire Statement shall be secured through condition. Fire safety will also be considered in further detail at Building Regulations stage.

Relationship with neighbouring sites and assessment of amenity impacts

238. One of the core planning principles in the NPPF is that decisions should "always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings". London Plan Policy D6 states that the design of development should 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.

Sense of enclosure:

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

240. In relation to the 45-degree line test, buildings C1 and C2 have been designed to be sensitive to the relationship with residential properties on Sunleigh Road, with set backs provided to step down towards the eastern edge of the site. Building C1 has a notable set back at fourth floor level. There is a minor breach at this floor, where the 45-degree line intersects a 1.7m long section of building at parapet level. On the eighth floor there is also a further minor breach, where the 45-degree line intersects a section of building 4.5m long, at this point the building massing is set even further back within the site maintaining a separation distance of 19.3m to the shared eastern boundary. The envelope of building C2 is stepped back away from the eastern boundary and is broadly compliant with the 45-degree line test, with only a marginal intersection occurring with parapets at fourth (1.3m long section of building) and seventh floors (2.1m long section of building), where the building is offset 20.8m from the shared boundary. It is also acknowledged that a high proportion of residential properties between No's 16 – 44 Sunleigh Road also feature detached outbuildings located at the far end of their gardens, where these structures do exist, they mitigate any minor breach of the 45-degree line test where this occurs.

241. In relation to the 30-degree line test, which is taken from the rear façade (at a height of 2m) of residential properties along Sunleigh Road, for building C2 a minor breach occurs at the set back on floor seven where the 30-degree line intersects a 5m long section of the building. For building C1 a breach occurs on the set back eighth floor, where the 30-degree line intersects a section of the top floor 7.5m long, which is off set from the eastern boundary by 20.8m.

242. Where the minor breaches of the 45 and 30-degree line tests occur on the upper floors of buildings C1 and C2 these are offset from the eastern boundary by more than 10m, and separated by more than 20m from the rear façades of Sunleigh Road properties. These generous offsets and separation distances further mitigate the minor breaches discussed, helping to avoid a harmful sense of enclosure.

243. Neither Bigler Court or Dawson Court, to the south of the site contain rear facing habitable room windows at a height of 2m, these flatted buildings are orientated side on to the proposed development.

244. There is no breach of either the 45 or 30-degree line tests in relation to the single storey workshop (building D1) or the stand alone community centre (building D2).

Privacy:

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

246. In excess of 18m is to be maintained in between the direct facing habitable windows in proposed buildings C1 and C2, and to the existing rear facing windows to properties along Sunleigh Road. As the proposed buildings C1 and C2 step away from the eastern boundary the separation increases to over 30m on the upper floors. To the south of the site, a minimum separation of 18m is achieved to Bigler Court, increasing to 21m above ground floor, from building B2. To the western side of the site, buildings A, B1 and B2 are offset from the centre line of the adjacent railway by 9-10m, which is expected to ensure that privacy will not be compromised should the site on the western side of the railway (Rosemont Road) come forward for residential redevelopment at a future date.

247. Within the proposed site layout itself the individual residential buildings are laid out and located in such a way that a good overall level of compliance with SPD1 is to be achieved. The separation between C1 and C2 is well in excess of 18m (ranging from 29m up to 36.5m), and this also applies to the separation between B1 and B2 (which is up to 26m). Between building A and B1, above ground floor a generous separation of 34m is maintained. Distances across Atlip Road range from 15m to 17m, which is acceptable as this slightly reduced distance is across a public road, so a different approach would apply in such a scenario. A separation of 13m is to be achieved from building A to the existing church at 197 Ealing Road, which is also located within the wider site allocation. As this distance is across Atlip Road then a reduced distance can be accepted and should the church site come forward in the future for redevelopment containing residential accommodation then its siting, design and layout would be expected to respond accordingly to surrounding sites to ensure overlooking and privacy conditions are appropriately addressed.

248. Overall, the proposed layout demonstrates a good level of compliance with SDP1, with only minor and limited breaches occurring, which is to be expected in an urban built up location like this and where proposed development is coming forward that is of a dense nature, in line with the site allocation.

Daylight and Sunlight assessment for nearby sensitive receptors

249. Scoped into the ES (see chapter 9) is a detailed assessment of the proposed developments potential / likely significant effects on daylight, sunlight and overshadowing (DSO) conditions of surrounding existing receptors, once completed. Mitigation measures are identified, where appropriate, to avoid, reduce or offset any significant adverse effects identified and / or enhance likely beneficial effects. All assessments have been undertaken in accordance with the 2022 Building Research Establishment (BRE) Guidelines for Daylight and Sunlight Assessment (BRE 209).

250. The assessment considers the existing baseline and a comparison of the completed development against the baseline conditions, which typically present high levels of existing daylight and sunlight due to the current low-rise and underdeveloped nature of the application site. These higher baseline levels make the surrounding receptors more susceptible to greater proportional change, as they currently experience unusually high levels of existing light, and therefore, could present larger reductions whilst still retaining light levels considered reasonable for an urban area (also a designated growth area in the Local Plan).

251. The assessment focuses on;
- Loss of natural daylight to adjacent properties
- Loss of natural sunlight to adjacent properties; and
- Overshadowing of public / private external amenity space

252. The assessment of potential effects during demolition and construction of the development on DSO conditions to surrounding properties has not been modelled and was scoped out of the ES. This is acceptable, as the effects would almost certainly be less than the completed development, which has been modelled and represents a worst-case assessment.

253. Residential properties are considered to be sensitive receptors as the occupants have a higher expectation of daylight and sunlight for habitation. As described in the BRE Guidance, commercial buildings are deemed less sensitive receptors. As such, the commercial buildings on Wharfside Business Park to the west of the site, the community centre at 197 Ealing Road and Alperton London Underground Station to the north have not been considered in the assessment.

254. In respect to DSO, the study area consists of the residential properties and amenity areas within the immediate surroundings of the site that may be affected by the newly introduced massing of the completed development.

255. In regard to assessing daylight and sunlight for rooms within surrounding dwellings considered sensitive, only windows to living rooms, kitchens and bedrooms have been considered, in line with the BRE guidance. Alperton Community School (to the north) has also been considered a sensitive receptor, based on BRE guidance, section 2.2.2, and assessed accordingly. As the former Minavil House redevelopment (to the west) is a completed development this has been included for consideration as a sensitive receptor.

256. In terms of future receptors, 330 Ealing Road (former Alperton Bus garage), north of the site, is listed as a cumulative scheme and this is currently under construction but not yet complete. This cumulative

scheme has been included in the baseline and assessed as a future receptor.

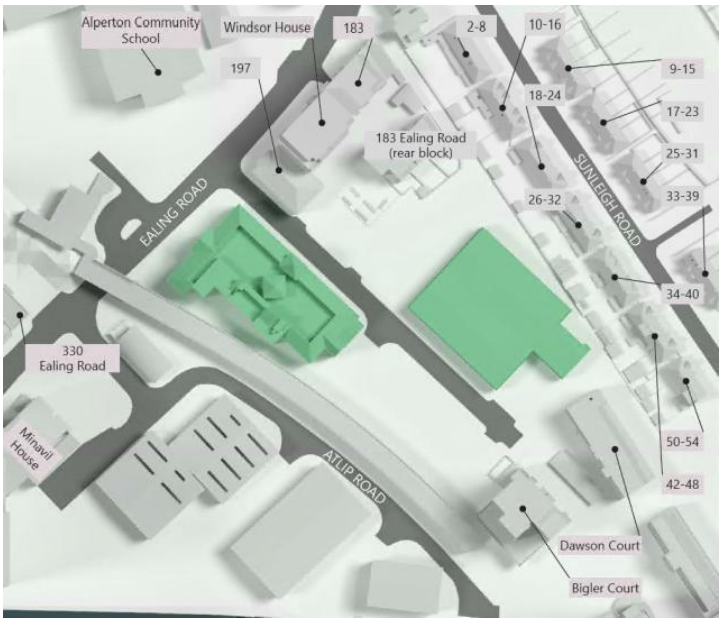
257. The sensitive receptors considered relevant for assessment are listed below and shown in figure 1.1 below;

Existing Receptors

- 2-54 (evens) Sunleigh Road;
- 9-39 (Odds) Sunleigh Road;
- Dawson Court;
- 1 – 36 Bigler Court;
- Windsor House;
- Hayes court (183 Ealing Road);
- Minavil House; and
- Alperton Community School.

Future Receptors

- 330 Ealing Road.



(figure 1.0 Location of existing sensitive receptors)

258. With regards to overshadowing, the sunlight amenity assessment considered the impacts of the development on existing neighbouring amenity areas located to the north, east and west of the site. In this case, the surrounding amenity areas considered include the gardens of the neighbouring properties, predominantly on Sunleigh Road. Areas located to the south are not considered sensitive due to the sun-path not casting shadows to the south. In total, 34 separate existing amenity areas have been considered relevant for the overshadowing assessment.

Daylight

259. The BRE Guidelines recommend two primary methods for assessing daylight for existing residential accommodation. Firstly, the Vertical Sky Component (VSC) assesses the proportion of visible sky and is measured from the centre point of the main window. Secondly, the No Sky-Line Contour (NSL) assesses the area of the room at desk height (850mm from floor level) from which the sky can be seen. When reviewing the daylight results for each property, they should be read sequentially: VSC and then NSL.

Sunlight

260. To assess impacts on sunlight to existing south-facing windows and amenity spaces, assessment of Annual Probable Sunlight Hours (APSH) is recommended by the BRE guidance.

261. The BRE Guidance states that to assess sunlight to an existing building, "*it is suggested that all main living rooms of dwellings, and conservatories, should be checked if they have a window facing within 90°*

of due south. Kitchens and bedrooms are less important, although care should be taken not to block too much sun". Therefore, the assessment considered sunlight to only the main living spaces that face within 90° of due south. Where room use is not clear, all rooms were considered.

Overshadowing

262. The overshadowing assessment comprise a Sun Hours on Ground assessment and a transient overshadowing assessment. The receptors sensitive to overshadowing effects are previously set out above.

Cumulative effects

263. Only (former) Minavil House and 330 Ealing Road (currently under construction) are considered close enough to the development to potentially give rise to cumulative effects. Other cumulative schemes identified are considered too far away from the site to give rise to potential effects on surrounding receptors.

Determining effect significance

264. This was determined by consideration of the sensitivity of the receptor, magnitude of impact, duration of the effect, geographical extent of the effect and application of professional judgement.

265. All receptors considered within this assessment are considered to be of high sensitivity. This is because all the receptors considered are either residential dwellings or amenity areas. BRE guidance on the magnitude of impact has been applied throughout the assessment.

Vertical sky component criteria (VSC)

266. The guidance recommends a window serving a habitable room should be able to benefit from a minimum absolute VSC value of 27%. In order to be regarded as meeting the VSC criteria once the development has been constructed, a window should either:

- Retain at least 27% VSC in absolute terms; or
- Retain at least 80% of its existing VSC value after the development is constructed

267. Where results show compliance with the BRE guidance, such an impact would be considered negligible. For the assessment of VSC, the ranges of reduction of the existing VSC value have been set at 20-29.9% (low), 30-39.9% (medium) and >40% (high) categories for magnitude of impact. Medium and high effects would typically be expected as a result of an urban regeneration scheme.

No sky-line contour criteria (NSL)

268. In order to be regarded as meeting the NSL criteria an existing 'habitable room' should retain at least 80% of its existing NSL value after the development is constructed. Where results show compliance with the BRE guidance, such an impact would be considered negligible.

269. If, following construction of the development, the NSL changes so that the area of the existing room which receives direct sky light is reduced to less than 0.8 times its former value, then this will be noticeable to the occupants and more of the room will appear poorly lit.

270. For the assessment of NSL, the ranges of reduction have been split into 20-29.9% (low), 30-39.9% (medium) and >40% (high) categories for magnitude of impact. Medium and high effects would typically be expected as a result of an urban regeneration scheme.

Sunlight

271. The BRE Guidance for the APSH method states that if a window:

"…can receive more than one quarter of annual probable sunlight hours, including at least 5% of annual probable sunlight hours during the winter months between 21 September and 21 March, then the room should still receive enough sunlight".

272. Accordingly, in order to be regarded as meeting APSH criteria, once the development has been

constructed, a window should either:

- Retain at least 25% total APSH and 5% APSH in the winter months in absolute terms;
- Retain at least 80% of its existing total and winter APSH values after the development is constructed; or
- The loss of total absolute annual APSH should be no more than 4% lower than the existing level.

273. Where the results show compliance with the BRE guidance APSH criteria, the effect is of negligible significance. Where the assessment demonstrates that sunlight levels will not meet either of the requirements set out above, the results were assessed on the basis of how far beyond the suggested targets the reductions from baseline levels will occur. For the assessment of total APSH, the ranges of reduction were split into 20-29.9% (low), 30-39.9% (medium) and >40% (high) categories of magnitude of impact. Medium and high effects would typically be expected as a result of an urban regeneration scheme.

Overshadowing

274. BRE guidance recommends that to be well sunlit, at least half of the amenity area in question should receive at least two hours of direct sunlight on 21st March, between the hours of 7am-5pm. If as a result of new development an existing amenity area (such as garden, park, children's playground) does not meet the above, and the area which can receive two hours of sun on the 21st March is less than 0.8 times its former value, then the loss of light is likely to be noticeable. BRE guidance gives no criteria for the significance of transitory overshadowing (where a number of gardens or open spaces could be affected), a qualitative assessment is required.

Baseline conditions

275. The existing baseline is comprised of two buildings: the Atlip Centre, (a two-storey building) and 2 Atlip Road (a two-storey retail warehouse building) together with hard surfaced parking areas. The wider surrounding area comprises a mix of uses, and building typologies of differing scales, including tall buildings.

276. In the baseline VSC assessment, results show that over half (55%) of windows do not meet the required target for absolute VSC. This is due to the majority of assessed windows being located beneath overhanging balconies. This is the case with deviations found within 25 Ealing Road, Bigler Court, Windsor House and 183 Ealing Road. These balconies limit the VSC levels the window receives by design. Further deviations are primarily found among the existing two-storey dwellings housing to the east of the development, on Sunleigh Road, many of which are caused by self-inflicting or neighbouring extensions, which constrain the outlook of windows within close proximity.

277. The results of the baseline NSL assessment, show that the vast majority of rooms (90%) meet the suggested targets of 80% of the room enjoying a view of the sky at desk height.

278. The baseline APSH assessment results, show that the vast majority of rooms (90%) do meet the BRE suggested targets for both Total APSH and Winter APSH. Where 10% of rooms do not meet the target, the majority of deviations occur in rooms underneath overhanging balconies (this is certainly the case in Bigler Court and Windsor House).

279. The results of the baseline sunlight amenity assessment to the surrounding amenity areas show that all of the 34 amenity areas assessed meet the BRE Guidance suggested target of at least 50% of the area achieving two hours of direct sunlight on 21st March. In terms of transient overshadowing, the primarily low-rise buildings on site present limited shadow on surrounding receptors. Notwithstanding this, the Sunleigh Road rear gardens experience some overshadowing in the afternoons as a result of the existing buildings on site and the surrounding buildings in the area.

280. The future baseline scenario (i.e. the baseline conditions without implementation of the proposed development) assumes in the absence of the development, the site would remain largely unchanged.

Completed development assessment of effects

281. Full details of the results of the VSC, NSL and APSH assessments are contained with the Appendix 9.2 to the ES. For the purposes of this report, these results are summarised, and where noticeable

effects are seen on a sensitive receptor these are discussed individually.

282. For daylight, the VSC and NSL assessments indicate there would be no noticeable change to the levels of sunlight, to a large number of dwellings on Sunleigh Road (No's 2-6, 50-52, 9-31 and 33-39 Sunleigh Road). The effect on these properties' daylight is considered negligible.

283. For sunlight the APSH assessment indicates there would be no noticeable change in levels of sunlight to the following properties:

1 – 36 Bigler Court	36 Sunleigh Road
Minavil House	40-42 (evens) Sunleigh Road
Alperton Community School	46-50 (evens) Sunleigh Road
183 Ealing Road	9-11 (odds) Sunleigh Road
2-22 (evens) Sunleigh Road	15-39 (odds) Sunleigh Road)
26-23 (evens) Sunleigh Road	

284. The remaining properties are considered below.

Daylight completed development results (in part):

Surrounding Properties	Total no. of windows	No. of windows achieving VSC levels resulting in no noticeable reduction from the baseline	No. of windows that achieve VSC levels resulting in a noticeable reduction from the baseline (20%-29.9% reduction)	No. of windows that achieve VSC levels resulting in a noticeable reduction from the baseline (30%-39.9% reduction)	No. of windows that achieve VSC levels resulting in a noticeable reduction from the baseline (Over 40% reduction)	Total
1 to 36 Bigler Court	91	51	0	0	40	40
1 to 21 Dawson Court	24	0	1	15	8	24
183 B Ealing Road	41	14	2	7	18	27
Minavil House	56	27	8	7	14	29
Alperton Community School	16	11	4	0	5	5
183 Ealing Road	27	25	2	0	0	2
Windsor House	50	14	9	5	22	36

NSL completed development results (in part):

Surrounding Properties	Total no. of rooms	No. of windows achieving NSC levels resulting in no noticeable reduction from the baseline	No. of rooms that achieve NSC levels resulting in a noticeable reduction from the baseline (20%-29.9% reduction)	No. of rooms that achieve NSC levels resulting in a noticeable reduction from the baseline (30%-39.9% reduction)	No. of rooms that achieve NSC levels resulting in a noticeable reduction from the baseline (Over 40% reduction)	Total
1 to 36 Bigler Court	66	50	3	5	8	16
1 to 21 Dawson Court	23	21	1	1	0	2
183 B Ealing Road	35	16	5	1	13	19
Minavil House	32	28	4	0	0	4
Alperton Community School	5	5	0	0	0	0
183 Ealing Road	26	26	0	0	0	0
Windsor House	47	19	8	6	14	28

APSH completed development results (in part):

Surrounding Properties	No. of rooms facing the Site and within 90° of due south	No. of rooms showing no noticeable impact for both Total and Winter APSH	No. of rooms showing a noticeable impact for both Total and Winter APSH
1 to 36 Bigler Court	23	23	0
1 to 21 Dawson Court	23	22	1
183 B Ealing Road	35	13	22
Minavil House	8	8	0
Alperton Community School	5	5	0
183 Ealing Road	25	25	0
Windsor House	47	18	29

285. To summarise the above results;

- For daylight, the VSC and NSL assessment indicate no noticeable change to the following properties; 2-6 Sunleigh Road, 50-52 Sunleigh Road, 9-31 Sunleigh Road and 33-39 Sunleigh Road;

- For sunlight the APSH assessment indicates no noticeable change in levels of sunlight to properties listed in the above in table.
- ***1 to 36 Bigler Court*****:** With the development in place, 51 (56%) windows out of the 91 primary windows tested would not experience a noticeable change in VSC (i.e. daylight). The remaining 40 (44%) windows will experience a major adverse effect. Majority of the deviations occur to the flank façade overlooking the site, and a number of windows affected are to dual aspect living rooms and bedrooms also served by non-site facing primary windows, and some are overhung by projecting balconies. The results of the NSL assessment show that 50 rooms out of 66 will not see a noticeable reduction in NSL levels, and where deviations occur these are to small galley type kitchens and some single aspect bedrooms. The deviating living rooms are largely mitigated as they are dual aspect The overall effect to daylight within this property is considered moderate – major adverse (significant).
- ***1 to 21 Dawson Court*****:** This property has no windows on the flank elevation which directly overlook the application site. With the development in place, all of the 24 assessed windows will see a VSC reduction below BRE recommended targets, eight experience major reductions. The results of the NSL assessment show that 21 out of 23 rooms assessed will see no noticeable reduction, despite the VSC reductions, which is considered acceptable for an urban context. Overall, the light distribution to be retained to rooms within this property is very good, with the development in place. For sunlight, 22 (96%) out of 23 of the assessed rooms will see no noticeable reduction in APSH levels, with the only deviation being to a bedroom, so the overall effect on sunlight to this property is considered negligible (not significant). Taking into account the reductions in VSC as well as the high levels of daylight distribution, the overall effect is considered to be moderate adverse (significant).
- ***183b Ealing Road****:* With the development in place, 14 out of 41 windows will not see a noticeable reduction in VSC levels. Of the remaining 27 windows, 18 receive major reductions, 7 moderate reductions and 2 receive minor reductions. Of these 27 windows, 14 retain daylight levels of at least 17.2% VSC, which is typically above what has been deemed acceptable for an urban location. The remaining 13 windows are constrained in any event due to the building design which makes it more susceptible to such reductions (i.e. its set back design). The results of the NSL assessment show that 16 of 35 rooms would not see a noticeable reduction in line with BRE guidance, with major effects to 13 rooms, some of which occur due to the window siting within or on corner setbacks. The remaining rooms where deviations occur enjoy unusually high levels of daylight in the baseline scenario on account of the undeveloped nature of the application site. The overall effect to daylight is considered to be moderate – major adverse (significant). With the development in place 13 (17%) out of 35 of the assessed rooms will see no noticeable reduction in APSH (sunlight) levels. The majority of deviations occur in rooms deemed less sensitive to sunlight (i.e. bedrooms and kitchens). The overall effect on sunlight is considered minor adverse (not significant).
- ***Minavil House:*** There will be no noticeable change to levels of sunlight to these properties. With the development in place, 27 (48%) out of the 56 windows will not see a noticeable reduction in VSC levels. Of the deviations, 15 are major effects, and the majority occur in windows serving dual aspect rooms, which are mitigated by non-site facing windows. It is also relevant that all affected windows are overhung by projecting balconies, so are impacted by building design in any event. Results of the NSL assessment show that 28 (88%) out of the 32 rooms assessed will not see a noticeable effect, the 4 rooms (all single aspect bedrooms overhung by balconies) where deviations occur will all experience minor reductions only. The overall effect to daylight is considered to be minor adverse (not significant).
- ***Alperton Community School:*** Whilst this is not a residential receptor, the classrooms and library have been assessed in line with BRE guidance. With development in place, 11 (69%) windows out of 16 assessed would not see a noticeable change in VSC, where there are deviations these occur to classrooms served by at least one other compliant window, and in any case good levels of daylight are retained (17.4% to 25.4% absolute VSC). The NSL assessment shows that there would be no noticeable effect to any of the five rooms assessed. The overall impact to this property is considered to be minor adverse (not significant).
- ***183 Ealing Road:*** This building contains windows to the rear elevation which will overlook the application site. There will be no noticeable change in levels of sunlight to these properties. With the development in place, 24 (89%) out of 27 windows would not see a noticeable reduction in VSC levels. For each of the deviations windows are overhung by solid balconies, which limits daylight potential in any case and all three rooms will see relatively high retained VSC values above 20.6%. Results of the NSL assessment show that all five rooms assessed would see no noticeable effect. The overall effect to daylight is considered to be minor adverse (not significant).
- ***Windsor House***: This building contains windows to the rear elevation which will overlook the application site. With development in place, 14 (28%) out of 50 windows would not see any noticeable reduction in VSC. Of the 36 deviating rooms, 22 are major effects, 9 minor and 5 moderate. All deviations that occur are below solid overhangs which limit daylight potential in any event (evidenced by the low VSC levels in the baseline scenario, similar to 1-36 Bigler Court and

Minavil House). Results of the NSL assessment show that 19 of the 47 rooms assessed would not see a noticeable effect. Of the 28 deviating rooms, 14 are major effects, 8 are minor and 6 are moderate and once again a large number of deviations occur below overhanging balconies and also enjoy unusually high levels of daylight previously due to the undeveloped nature of the site, and 17 of the deviating rooms retain at least 50% NSL. Remaining deviations occur where rooms are located underneath overhanging balconies and they previously enjoy unusually high levels of daylight as a result of the undeveloped nature of the application site, making this receptor more susceptible to larger proportional reductions. It is considered the overall effect to daylight is moderate – major adverse (significant). In terms of sunlight, with development in place, 16 (34%) out of the 47 rooms assessed would not see a noticeable reduction in APSH levels. All 31 deviating rooms are obstructed by an overhanging balconies which limit the sunlight potential to rooms located below in any event. The overall effect to sunlight is considered to be moderate adverse (significant).

286. On Sunleigh Road, noticeable reductions in daylight are to be expected to windows (bedroom, living room and kitchens) at a number of properties, including numbers 8 – 48 and 54 (VSC) and numbers 8, 20, 22, 28, 30, 32, 36, 38, 40, 48 and 33 (NSL). Just a small number of rooms (7) will experience a noticeable impact in APSH levels with the development in place.

287. At 330 Ealing Road (block B) which is a residential led mixed use block under construction, 36 (72%) of the 50 windows would not see a noticeable reduction with the development in place. Of the 14 deviations, these would either be minor (12) or moderate (2), and seen within living / kitchen / dining rooms and effects are exacerbated by solid overhanging balconies which limit daylight potential in these rooms. Results of the NSL assessment show all 30 rooms assessed would see no noticeable effect. The overall effect on daylight within this property is considered minor adverse (not significant).

Overshadowing

288. The BRE Guidelines also recognise that different criteria for daylight and sunlight may be used in dense urban areas where the expectation of light and outlook would normally be lower than in suburban or rural areas, and support the use of a 'mirror image' analysis in such cases. The NPPF (2024) also supports a flexible approach to applying standards in order to make efficient use of sites, and this approach is also reflected in the Mayor's Housing SPG, which advocates that when applying the BRE guidelines to apply these rigidly, recognising the London Plan's strategic approach to optimise housing output and the need to accommodate additional housing supply in locations with good accessibility suitable for higher density development.

289. BRE overshadowing criteria for a garden or outdoor amenity space to be considered well sunlit, is that, at least 50% of the garden or amenity space must receive at least two hours of direct sunlight on the 21st March. If this cannot be achieved, providing that the area overshadowed with the proposed development in place would be greater than 0.8 times the existing level of shadowing, it is considered that no effect on overshadowing would occur.

290. The results of the sunlight amenity assessment show that 31 of the 34 amenity areas surrounding the development will show full compliance with the recommended targets set by BRE guidance (i.e. receiving at least 2 hours of direct sunlight over at least 50% of the area on 21st March, or show less than 20% reduction from the existing scenario), which is a high level of compliance in an urban location. Where the target is not achieved this is related to a small area of open piece of grass in between Dawson Court and the proposed development, and two private amenity spaces to the rear of 183b Ealing Road (rear block), which will experience major adverse reductions exacerbated by their location immediately north of the existing undeveloped site. Given the existing low-rise building typologies, any meaningful development proposed, in line with the aims of the site allocation, would be expected to result in reduction in sunlight to these private gardens, due to their orientation. A graded study has been undertaken to highlight these gardens would experience 1-1.5 hours of sunlight to at least 50% of the space, so are not significantly below the BRE suggested threshold of 2 hours sunlight.

291. Transient overshadowing results look at conditions on different dates throughout the year. There will be effects beyond the site boundaries, on 21st March, to Sunleigh Road properties, gardens at 183b Ealing Road, though these shadows will quickly pass over. The degree of shading is shown to be less on 21st June and on 21st December, to a more concentrated area.

Mitigation

292. Measures have been included throughout the design process with a view to mitigating any potential daylight, sunlight and overshadowing effects. For example, by locating the tallest buildings (A, B1 and B2) to the western side of the site, and stepping down of the massing towards lower-rise surrounding receptors (and gardens) to the east, including along Sunleigh Road.

293. Residual effects in relation to daylight and sunlight would be negligible to moderate-major adverse and the likely residual effects in relation to overshadowing would be negligible to moderate adverse.

294. In conclusion, given the relatively open and low scale nature of the existing undeveloped site, it provides higher levels of light to surrounding receptors than would be expected in this urban location (and within a growth area in a highly sustainable location) where higher density redevelopment of the site is supported through the adopted Local Plan and site allocation policy. To make most efficient use of the site and bring forward development in line with the aims of the site allocation this will naturally result in some adverse impacts to neighbouring receptors.

295. The identified impact to the properties above should therefore be balanced against the benefits of the scheme overall, and Members should therefore consider whether those benefits do outweigh the harm identified.

296. It is relevant to note that paragraph 130 of the NPPF (2024) states;

"130. Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:

… c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).

297. In summary, the applicant has taken care to design a scheme that on the whole maintains appropriate and in places generous separation distances, is of a height, scale and massing that is in keeping with the location, with considered placement of the tallest buildings and stepped down massing employed to respond to more sensitive boundaries and nearby receptors, whilst still looking to optimise use of the site for housing, which is encouraged by the NPPF and is appropriate given it is brownfield land in a highly sustainable location, and meets the wider aspirations of the Local Plan site allocation policy. There will be some negative effects in terms of impacts to daylight, sunlight and shading conditions to nearby sensitive receptors, as identified and discussed above, which is not unexpected in a built up urban context, even more so in a growth area. Given these considerations, and the planning benefits of the scheme overall, on balance the proposal is considered acceptable in respect of daylight, sunlight and overshadowing effects, despite the identified negative effects post development.

Energy and sustainability, whole life-cycle carbon, circular economy and overheating

298. Chapter nine of the London Plan sets out a comprehensive range of planning policies underpinning London's response to climate change and mitigation. These are supplemented by policies within the Local Plan (Chapter 6.7). The application is supported by a suite of documents that address the various adopted policies and guidance.

299. All major developments are expected to achieve zero carbon standards including a minimum 35% reduction on the Building Regulations 2021 Part L Target Emission Rates (TER) achieved on-site, in accordance with the energy hierarchy set out in London Plan Policy SI2.

300. For the residential parts of the development, the policy also requires at least 10 percentage points of the minimum 35 percentage point reduction to be attributable to energy efficiency measures (known as 'be lean' measures) and for the commercial parts of the development, the policy requires at least 15 percentage points of the reduction to be attributable to 'be lean' measures.

301. Major developments are required to prepare and submit an energy strategy to demonstrate how the zero-carbon target (London Plan policy SI 2) would be achieved within the framework of the energy hierarchy, and where this is not achievable, an appropriate financial contribution towards Brent's carbon-offsetting fund should be agreed to compensate for any residual carbon emissions or through

off-site measures. The carbon-offset payment shall be based on the notional price per tonne of carbon of £95 over 30 years. Ongoing monitoring and reporting of energy performance is also required under the 'Be Seen' part of this policy, and a Whole Life-cycle Carbon Assessment is required for applications referable to the Mayor. London Plan Policy S7 also requires a Circular Economy Statement.

302. Policy SI4 requires the energy strategy to include measures to reduce the potential for internal overheating and reliance on air conditioning systems.

303. Brent's Sustainable Environment and Development Supplementary Planning Document (adopted June 2023) provides guidance on a range of sustainable development issues.

304. Planning applications for major development are required to be supported by a Sustainability Statement in accordance with Policy BSUI1, demonstrating at the design stage how sustainable design and construction measures would mitigate and adapt to climate change over the lifetime of the development, including limiting water use to 105 litres per person per day.

Carbon Reduction / Proposed Energy Statement:

305. The submitted Energy Statement and the Overheating Assessment (February 2024), prepared by XCO2, outlines the approach to carbon emission savings and renewable energy, and aligns with the London Plan energy hierarchy and follows the methodology set out in the GLA Energy Assessment Guidance (2022).

306. Baseline CO2 emissions for a building regulations Part L 2021 compliant building were established and the three-step energy hierarchy consisting of Be Lean, Be Clean and Be Green measures were applied to demonstrate compliance with the relevant policy targets.

307. The site wide cumulative CO2 emissions and savings are presented in the table 1.5 below;

Category	Total regulated emissions (tonnes CO2/year)	Regulated CO2 savings (tonnes CO2/year)	Percentage saving (%)
Baseline	521.4	-	-
Be Lean	404.37	117.03	22.40%
Be Clean	404.37	0	0.00%
Be Green	156	248.36	47.60%
Total	-	365.4	70.10%
Offset to zero carbon for domestic	102.89 tCO2/year (3086.6 over 30 years)		
Offset to zero carbon for non-domestic	53.12 tCO2/year (1593.5 over 30 years)		

Be Lean

308. At the 'Be Lean' stage, the proposed development meets the GLA target of 10% regulated CO2 emission reductions for the domestic portion of the scheme. For the non-domestic portion of the scheme the achieved reduction is below the required GLA target of 15%. Although there is a shortfall, the applicant has sought to maximise emission savings and all options have been explored in terms of emissions reductions for the co-living building and other non-domestic areas.

309. A fabric first approach with an exhaustive range of measures, to improve performance at the 'Be Lean' stage of the energy hierarchy as far as feasible has been applied.

310. Key design measures proposed as part of the design include:

- Significantly improved U-values beyond the Part L 2021 minimum standards.

- Significantly improved air permeability of 3m3/h/m2 for the residential and 2.5 m3/h/m2 for the non-domestic portions of the scheme, beyond 2021 Part L 2021
- Improved thermal bridging.
- Optimised g-value of the glazing – to provide a balance between minimising heat gain in summer (to reduce overheating/cooling energy), maximising useful heat gain in winter (to reduce heating energy) and maximising natural daylight (to reduce lighting energy).
- Highly efficient air source heat pumps to provide the heating and hot water.
- High efficiency mechanical ventilation system with heat recovery. The proposal includes fresh air cooling that is based on air tempering via the MVHR units.
- Low energy fittings and lighting.
- Control systems to monitor and operate the plant and equipment efficiently.
- Incorporation of 354m2 of Photovoltaic panels to contribute to energy generation and carbon reduction.

Be Clean

311. The application site is located within a Heat Network Priority Area, however no existing or planned District Heating Networks (DHN) at the time of the application were shown by the London Heat Map. The nearest network is approximately 2.1km away from the site, so connection to this would not be viable.

312. There is a nearby development with a DHN but that is based on gas as fuel and applicant engagement with the operator has established there is no decarbonisation plan in place for this network, so connection to this is not feasible, which is also acknowledged by the GLA through their Stage 1 comments. As such, a site-wide heat network incorporating low carbon heat generation is proposed; the strategy will future proof the connection of the development to a de-carbonised district heating network should one become available in the future by providing "connection-ready" plant space. A low carbon, all-electric strategy is proposed for the central plant of the development, and this is to be located on the ground floor. This will comprise communal ASHPs that will supply space and water heating for both the domestic and non-domestic components of the development.

Be Green

313. For the overall regulated CO2 savings on site against a Part L (2021) compliant scheme, the proposed development exceeds the GLA guidance target of 35% regulated CO2 emissions reductions for the domestic portion of the scheme, and also site wide, it is estimated to achieve a 77.4% reduction on Part L (2021). However, similarly to the 'Be Lean' stage, the carbon emissions reduction achieved for the non-domestic portion of the scheme fall short of this target, it is estimated to achieve a 19.7% reduction on Part L (2021).

314. The renewable technologies feasibility study carried out for the development identified photovoltaics and air source heat pumps (ASHP) as suitable renewable technologies for the development.

315. The following alternative technologies were considered and discounted:

- *Biomass* – not adopted; burning of wood pellets releases high NOx emissions and there are limitations for their storage and delivery within an urban location;
- *Solar Thermal* - not adopted; PV is deemed more feasible and roof space has been maximised to include PV and ASHP area;
- *Ground Source Heat Pumps* - not adopted; the installation of ground loops requires significant space, additional time at the beginning of the construction process and very high capital costs; and
- *Wind* – not adopted; wind turbines located at the site will have a significant visual impact on the building scape and have reduced efficiency in an urban setting.

316. The Energy Statement indicates a proposed PV array of 345sqm, and further details will be secured

by condition to confirm the total amount to be installed.

317. The development does not achieve the net-zero carbon target in policy SI2, although it meets the minimum 35% reduction site required by policy. As such, a carbon offset payment is to be secured in any s106 agreement, which is estimated to be £444, 609 (£95 per tonne).

Be Seen

318. In line with London Plan Policy SI2, the energy performance of completed development is required to be monitored, verified and reported following construction. This will include monitoring of the performance and output of the PV system and the communal ASHP's. Further details are to be secured via obligations and condition.

Sustainable Building Design & BREEAM:

319. In accordance with London Plan and Local Plan policies, a BREEAM pre-assessment has been undertaken and was submitted as part of the Sustainability Statement. The proposed development is targeting a BREEAM rating of 'Excellent' for all non-residential elements, including building A.

320. The applicant has responded to all energy items raised by the GLA within their "initial Stage 1" and subsequent responses, to which all matters are considered to have either been fully resolved or can be dealt with via planning conditions or captured in any s106 agreement.

Overheating Assessment:

321. Policy SI4 (Managing heat risk) of the London Plan confirms that major development proposals should demonstrate how they would reduce the potential for internal overheating and reliance on air conditioning systems in accordance with a hierarchy that prioritises passive measures over active measures. In line with Policy SI4, the Applicant submitted a detailed overheating analysis for the proposed development.

322. A CIBSE TM59 Assessment was carried out in accordance with Building Regulations Part O to analyse the overheating risk.

323. Measures incorporated into the design as a result of this analysis are:

- All residential windows above ground level, except for those fronting the Piccadilly line, will incorporate large openable areas side hung by 90 degrees, with only the bottom panes fixed in Blocks C and Blocks B).
- Windows fronting the Piccadilly line will have restricted inwards opening mechanism fixed at the base;
- For solar control, glass of low g-value (0.50) for all windows and glazed doors will be specified to avoid excessive solar transmittance during summer, but allow for a suitable amount of passive solar gains in the winter;
- Provision of external shading in the form of balconies that provide shade across façades has been incorporated within the original design for controlling solar gains in Blocks B and Blocks C;
- Due to the expected noise restrictions on the opening of the windows overnight for certain façades, a trim cooling provision from the mechanical ventilation heat recovery (MVHR) with incorporated cooling coil is recommended for certain units.
- Central Air Handling Units (AHUs) will provide mechanical ventilation to the co-living units within Block A. Due to the acoustic restrictions (as per Part O requirements) on all facades of Block A, cooling coils will be incorporated in the AHUs to allow for trim cooling provision;
- Energy efficient light fittings that emit less heat than standard types will also be specified to reduce overheating potential;
- Communal corridors were modelled with continuous Automatic Opening Vent at 4 ach (air changes per hour) which was found to be sufficient in allowing them to meet the Part O criteria and therefore

they are not considered to be a risk for overheating.

- In case of overheating during extreme weather conditions, residents are encouraged to make use of their private amenities, in the form of balconies provided to all flats across Blocks B Blocks C, as well as the communal open spaces at ground floor, and communal/amenity spaces of Block A.

324. A representative sample of units considered more likely to overheat were selected e.g., top floor, single aspect, south facing, three bedroom units and units that fail to comply with the noise criteria set by Part O.

325. In addition, three scenarios are used (Design Summer Year (DSY)), representing different types of hot summers

- DSY1 – moderately warm summer, with a return period of seven years.
- DSY2 – short, intense warm spell, about the same length as the moderate summer year but with a higher intensity.
- DSY3 – long, less intense warm spell, which is less intense than the high-intensity year, but longer and more intense than the moderate summer year.

326. The individual results of the three tested scenarios are presented in the table 1.6 below.

	DSY1 (with cooling)	**DSY2**	**DSY3**
Residential			
Rooms Tested	284	284	284
Rooms passing criteria	284	177	168
% Pass Rate	100%	62%	59%
Non-domestic			
Rooms	6	6	6
Rooms passing criteria	6	6	6
% Pass Rate	100%	100%	100%

327. The nature of the DSY2 and DSY3 weather files is such that it becomes particularly difficult to fully mitigate overheating risk in accordance with Part O criteria owing to their onerous conditions. In essence, they are representative of a period where overheating is an intrinsic risk within the environment itself, rather than a risk imposed by inappropriate design.

328. Following assessment of the model with the DSY2 and DSY3 weather files, it can be observed that the criteria cannot be met for all habitable spaces tested, and the overheating risk cannot be fully mitigated through the currently implemented measures alone given the onerous nature of the more severe weather.

329. The results for DSY2 and DSY3 for 2020's period are for informative purpose only. The scheme has sought to comply with DSY1 as per GLA's policy by including solar control glazing with g-value of 0.5 throughout all residential spaces as well as generous Free Areas and has sought to go as far as feasible in terms of performance with 2020's DSY2 and DSY3 weather files.

Whole Life-Cycle Carbon:

330. In accordance with London Plan Policy SI 2 and relevant GLA guidance the applicant is required to calculate and reduce whole life-cycle carbon emissions to fully capture the development's carbon footprint, which includes carbon emissions resulting from materials, construction and use over a

building's entire life, including demolition and disposal.

331. The application is supported by a Whole Life Cycle Carbon Assessment (WLC), which has been undertaken in accordance with the relevant GLA LPG (March 2022).

332. The WLC sets out a series of reduction principles and proposed actions that have been considered to try and reduce life-cycle carbon emissions. The results show that the highest contribution to the embodied carbon of the project is expected to be the Superstructure followed by the FF&E.

333. The following options were implemented in order to reduce the building's whole life embodied carbon:
- Reducing upper floor slab thicknesses from 250mm to 225mm

334. Comparing this to the modelled 'business-as-usual' case of 'no improvements implemented beyond the cost plan quantities', this strategy allowed a predicted reduction in embodied carbon of 3,104,000 kg CO2e, equivalent to 3% of the total life-cycle embodied carbon.

335. A number of additional opportunities for carbon reduction were identified to be investigated at the next stage, with a view to achieving further reductions in whole life carbon. The largest potential reduction could be made via Scenario 3; which would utilise 50% Ground Granular Blast Furnace Slag (GGBS) for concretes in the substructure; and 40% GGBS for those used in the superstructure followed by specifying plasterboards with 20% recycled contents.

Circular Economy:

336. Policy SI 7 of the London Plan (Reducing waste and supporting the circular economy) promotes the circular economy outcomes and aims to achieve net zero-waste. Policy D3 requires proposals to integrate circular economy principles into the design process.

337. The application is supported by a Circular Economy Statement which has been prepared in accordance with London Plan Policy SI 7 and GLA guidance a Circular Economy Statement (CES).

338. The CES incorporates the following circular economy principles:

- Building in Layers;
- Designing out Waste;
- Designing for Longevity;
- Designing for Adaptability or Flexibility;
- Designing for Disassembly;
- Using Systems, Elements or Materials that can be Reused or Recycled.

339. The GLA has confirmed that both whole life-cycle and circular economy principles have been addressed satisfactorily at this stage, subject to recommended planning conditions being secured.

340. In conclusion, the proposals provide a sustainable and energy efficient scheme which seeks to maximise reduction of carbon emissions through the application of the GLA's energy hierarchy. It will incorporate the principles of whole life-cycle carbon and circular economy, and seeks to reduce risk of overheating. Post construction reporting conditions are required to accord with policies SI 2 and SI 7 of the London Plan.

Wind / microclimate impacts and reception of TV and radio services

341. Policy D8 requires amongst other considerations that development proposals should ensure that appropriate shade, shelter, seating and, where possible, areas of direct sunlight are provided, with other microclimatic considerations, including temperature and wind, taken into account in order to encourage people to spend time in a place. It goes onto say within policy D9 that wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building. Local Plan policy BD2 (tall buildings) requires consideration of environmental impacts, such as wind and microclimate conditions.

342. To support the application, a 'Wind Microclimate Assessment' (WMA) prepared by RWDI, has been submitted, and forms part of chapter 8 of the ES. The makes an assessment of the likely significant effects arising from the proposed development upon wind microclimate. The wind assessment considers the effect of the surrounding context and pays particular attention to wind effects in open amenity spaces, building entrances and pedestrian routes to determine the level of adherence to the recommended standards for sitting, standing and leisure walking. The extent of the study area covered a 360m radius from the centre of the site in line with best practice guidance. Baseline conditions across the site and surrounding area were defined using wind tunnel testing.

343. The assessment of the wind microclimate impact comprised four stages:

a. Measure the wind speeds at pedestrian level in the wind tunnel relative to a reference wind speed;

b. Adjust standard meteorological data to account for conditions at the Site;

c. Combine these (a and b) to obtain the expected frequency and magnitude of wind speeds at pedestrian level; and

d. Compare the results with the Criteria to 'grade' conditions around the Site.

344. Cumulative schemes were included in the wind assessment for robustness, including the former Alperton bus depot scheme, as well as others, and off-site conditions have been assessed. The assessment of the wind conditions used the Lawson Criteria comfort categories for determining possible effects.

345. The results of the assessments identified that in the completed development scenario (without landscaping in situ), it is expected that;

- all pedestrian throughfare areas will have wind conditions suitable for sitting / strolling, as such will be suitable for the intended use. Save for one off site location, to the south of 197 Ealing Road, where mitigation measures are required.
- Majority of entrances within the development will have suitable wind conditions, however, four entrances require mitigation. All off site entrances will have suitable wind conditions.
- Off site bus stops and train platforms will have suitable conditions and do not require mitigation, the same applies to pedestrian crossings (along Ealing Road).
- Off site car parks will have suitable conditions and will not require mitigation.
- All mixed-use amenity locations at ground level will have suitable wind conditions during the summer season. In between buildings A and B there are two locations that will require mitigation.
- Majority of roof terraces will have suitable conditions for their intended use during the summer season, some mitigation measures will be required for the level 9 northwest facing terrace in building B2.
- All balconies within the development will have suitable wind conditions during summer, and will not require mitigation.

346. With the proposed landscaping, mitigation measures and existing surrounding buildings in place, and the cumulative development, no safety exceedances due to strong windows will be present.

347. The need for mitigation measures was identified to limit the adverse effects of the proposed development and achieve the required wind conditions for the designated uses. After initial testing had been carried out preliminary mitigation was incorporated into the development. This includes implementation of the proposed landscaping scheme, provision of specific trees of type, size, quantity and layout, within strategic locations of the proposed site, the addition of a fence in one specific location north of building D2, minor chamfering of the northern corner of building A, relocation of entrances to building A, and additional of a 1.8m high balustrade to the level 9 roof terrace in building B2.

348. Following submission of design amendments to the scheme (Nov 2024), specifically changes to external balconies serving building B1, these have been reviewed in the context of the initial WMA conclusions. The updated review is set out in a Statement of Conformity, which concludes that the design

changes to balconies (building B1 only) would not be expected to create any material changes to the wind conditions reported previously, and that the conclusions initially reached remain valid.

349. It is expected that with final mitigation measures in place, there would be no remaining adverse significant wind effects requiring mitigation. Officers therefore recommend that details of mitigation measures are conditioned to any forthcoming consent. On this basis, the scheme is considered to be acceptable with regard to wind microclimate impacts.

TV and radio reception impact assessment:

350. London Plan Policy D9 (Tall buildings) confirms that buildings should not, amongst other things, interfere with telecommunication, while Policy SI6 (Digital connectivity infrastructure) advises that developments should take appropriate measures to avoid reducing digital connectivity. These are reflected in Local Plan Policy BD2 (Tall Buildings).

351. The application is supported by a Television and Radio Reception Impact Assessment, which includes a baseline (pre-construction) signal survey and reception impact assessment. This is to determine any potential effects on the local reception (TV and radio) as a result of the proposed development being built.

352. Widespread interference to digital terrestrial television reception is not expected, though the proposed development may cause degradation to reception conditions immediately adjacent to the site in north-westerly direction, close to Hayes Court, Windsor Court and the Church of God of Prophecy. In the event interference does occur, antenna betterment or relocation should re-enable optimal reception.

353. The proposal may cause interference to the reception of digital satellite services (i.e. Sky) in areas to the immediate north-west of the site, and within 192m from the base of the tallest proposed building. Additionally, in similar areas use of cranes could lead to some sporadic interference. The relocation of dishes to more optimal locations should restore optimal reception.

354. Reception of VHF (FM) radio is unlikely to be adversely affected by the development

355. In summary, the proposed development once built, and the temporary use of cranes during construction can be expected to cause some degradation of existing reception in locations north-west of the site. Mitigation solutions referred to above should restore reception to affected properties. If satellite dishes cannot be relocated out of any signal shadow zone, the use of DTT receiving equipment or TV via cable / fibre could also offer viewers alternative sources of broadcasts. Implementation of any mitigation measures necessary shall be secured through the s106 legal agreement.

Environmental health considerations

Air quality

356. Like many areas in Brent, the site is in an Air Quality Management Area and an Air Quality Focus Area. London Plan Policy SI 1 requires that all major developments within London are Air Quality Neutral. As such, an Air Quality Neutral Assessment needs to be undertaken and submitted with the planning application. Brent's Policy BSUI2 requires major developments in Growth Areas to be Air Quality Positive, in line with the approach set out in the GLA's published Air Quality Positive guidance. The NPPF (paragraph 170) also states developments should make every effort to ensure local air quality conditions are improved.

357. The application has been accompanied by an Air Quality Assessment (AQA) which includes an air quality neutral assessment and air quality positive statement. The report demonstrates that the area of the development is below the air quality objectives and therefore development within this area is suitable for residential and commercial uses.

358. The assessment considers the potential air quality impacts associated with the development. These impacts could be experienced from the construction including dust generation and track-out. In this regard, it is recommended that conditions are secured in relation to a Construction Method Statement (CMS) and compliance with the London Non-Road Mobile Machinery (NRMM) Low Emission Zone standards. In relation to the operational impact of the proposed development, the scheme dispersion modelling of traffic on the local road network indicates that pollutant concentrations will be within the relevant long and short-term air quality standards at the façade of the proposed dwelling and therefore mitigation measures are not required.

359. The application has been accompanied by an Air Quality Neutral Assessment, which demonstrate that the development would be air quality neutral in relation to traffic and building emissions. Specifically, the development will be 'car-free' and will generate less traffic than the existing site uses (including the existing surface level car park). The proposed energy strategy will be all electric with the use of Air Source Heat Pumps and PV, and with no combustion emissions associated with the site. An Air Quality Positive Statement has been submitted, which details measures to maximise benefits to local air quality in and around the site, whilst also minimising exposure to existing sources of poor air quality.

360. The assessment has been reviewed by Environmental Health officers, who have confirmed that it is acceptable and that there are no objections in relation to air quality subject to conditions relating to a CMS and NRMM. Additionally, the GLA recommended a condition relating to the use of backup generators.

Noise and vibration

361. London Plan Policy D14 expects new developments to reduce, manage and mitigate noise to improve health and quality of life. Policy D13 (Agent of change) of the London Plan expects that planning decisions reflect the Agent of Change principle and take account of existing noise and other nuisance-generating uses in a sensitive manner when new development is proposed nearby, with the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. NPPF (paragraph 187) states that new development should avoid giving rise to adverse noise impacts on the site and surrounding area.

362. A Noise and Vibration Impact Assessment (NVIA) was submitted with the application, and this assesses the potential for the impact of environmental noise on the proposed residential uses and gives acoustic performance specification for the building fabric to ensure recommended internal noise levels are achieved. This includes a noise survey which identifies sources of external noise in the vicinity of the site, which are primarily from road traffic (Ealing Road), industrial/commercial noise from nearby industrial units and the Piccadilly Line. Noise surveys were carried out to establish baseline noise levels at the site, and these results used to determine the scheme of mitigation that is required to safeguard amenity of future residential occupiers.

363. The results of the noise survey show that glazing with enhanced acoustic performance is required for habitable rooms at the northeast end of building A, on the fourth floor and below, and for bedrooms overlooking the railway lines. Typical thermal double glazing will be acoustically acceptable for all other elevations. The use of mechanical ventilation heat recovery (MVHR) is recommended to provide alternative ventilation without the need to open windows. Attenuation should also be included to the MVHR systems, if necessary, so that the internal noise criteria are not exceeded by noise generated, or intruding through the ventilation system. Adherence to the mitigation recommendations set out in the NVIA shall be secured by condition.

364. Having considered the submitted NVIA, Environmental Health Officers raise no objection, and to address potential for plant noise to result in harm to nearby residential amenity a condition is recommended that will require the plant rating level to be 10dB below the typical background noise level.

365. The vibration assessment measured levels that are no worse than a low probability of adverse impact. Some increased vibration may be experienced during the demolition and construction period, however no specific mitigation is required, though a Construction Method Statement will be secured as a condition in any event.

366. To address potential for noise transmission between proposed commercial / non-residential uses and dwellings above a condition is recommended to secure the submission and approval of further technical details to demonstrate how this will be dealt with.

367. Discussions during the consideration of the application took place between the applicant and TfL (Infrastructure Protection), who had a concern initially that noise and vibration from the operational railway lines had not been fully assessed. Conditions are recommended to address this.

368. In conclusion, subject to appropriate conditions being secured the proposed development is not expected to result in adverse impacts on prospective residents, or existing residents arising from noise.

Ground conditions / Contaminated land

369. The application is supported by a Ground Investigation Report (Feb 2024). A preliminary ground investigation was undertaken to determine the nature and geotechnical properties of the underlying soils, in relation to the design and construction of the foundations. A contamination assessment was also included within the scope of this report.

370. The report reaches a number of conclusions, including that, remediation will be required within any landscaped areas of the development, where remnant made ground soils will be exposed at the surface. Secondly, that the removal of made ground (0.60m), or a cover thickness of the same magnitude is considered prudent for areas of communal gardens and landscaping. Thirdly, any imported topsoil or subsoil should have appropriate certificates confirming its suitability for use. It is also recommended that an appropriate remediation plan and verification be secured, which can be achieved through planning conditions.

371. Having been reviewed by Environmental Health officers, this report and its conclusions is accepted. Due to soils containing elevated levels of some contaminants there is a similar recommendation that remediation work will be required and verification measures. Planning conditions are recommended to this effect.

Demolition and construction process

372. A pre-commencement condition is recommended, to secure the submission and approval of a detailed Construction Method Statement (CMS), including air quality and dust management plan. The CMS is required to minimise dust, noise and other environmental impacts of the construction process. A condition is also recommended to ensure all non-road mobile machinery used during construction complies with emissions standards set out in the GLA's SPG 'Control of Dust and Emissions during Construction and Demolition'.

Flood risk, drainage and water

Flood risk and drainage

373. Paragraph 173 of the NPPF states that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere and that where appropriate, applications should be supported by a site specific flood risk assessment. Part c of Paragraph 173 requires development to demonstrate that they incorporate sustainable drainage systems, unless there is clear evidence that this would be inappropriate.

374. London Plan policy SI12 requires development proposals to ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Policy SI13 states that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. Brent policy DMP1 seeks to prevent unacceptable increased exposure to flood risk as a result of new development and policies BSUI3 and BSUI4 require flood risk management sustainable drainage measures on major development sites.

375. The closest water course to the site is the Grand Union Canal located c.80m to the south. The site is within Flood Zone 1 (low risk), and there is an overland flood route which runs down Atlip Road flowing south-east. This route is contained within the extent of the carriageway. There is also a separate flow path from the north which runs alongside the north eastern and south eastern boundaries of the site which then insects with the flows in Atlip Road before continuing south towards the canal. This overland flood route is categorised as Flood Zone 3a for surface water flooding.

376. A Flood Risk Assessment (FRA) and Drainage Strategy (12501 Issue 3, dated 20 June 2024) have been submitted in support of the application, this includes revisions made in response to comments provided by the Local Lead Flood Authority (LLFA).

Mitigation

377. The existing site is predominantly impermeable. There is no evidence of any flow control or surface water attenuation. The proposed development will incorporate c. 2,110sqm of new soft landscaping and c. 2,881sqm of permeable surfacing, which will ensure that the volume of surface water runoff from the site is reduced.

378. A new surface water drainage system is proposed which will incorporate significant flow controls and attenuation. These measures will further reduce surface water runoff rates, as well providing significant volumes of onsite surface water attenuation. The extent of surface water flood risk will be reduced post development.

379. Built into the design of the development the following measures will provide further mitigation against flood risk;

380. Floor levels to ground floor residential units in block C1 and C2 set to be no lower than 300mm above the adjacent 0.1% surface water flood level;

- Ground floor levels to blocks A and B set outside of the 0.1% flood extents (n.b. ground floor uses in these blocks are all non-residential);
- External levels designed to fall away from all ground floor building entrances;
- Flood doors to be provided where plant rooms are located near to flood risk areas;
- Semi-basement area to block C2 to be constructed using waterproofing techniques with external doors set above the adjacent 0.1% flood level;
- Existing pinch point in the south-eastern corner of the site to be opened up by placing block C1 further away from the boundary. This will create a greater area for overland flood water to pass, thereby reducing he depth and extents of flood water in this area;
- Eternal patio areas to block C1 to be elevated above the ground level below

381. The extent of surface water discharging directly onto Atlip Road will be reduced as a result of the proposals (including the landscape proposals). With the surface water attenuation provided elsewhere on the site, the volume of flood water that would have historically flowed into Atlip Road should also reduce. Whilst there is no displaced flood water for the 1% flood event, it is recognised that a number of the new buildings will be located in areas which currently flood during the 0.1% surface water flood event. To ensure that flood water is not displaced off-site, a ground modelling exercise has been undertaken which re-provides the existing flood volumes within the new soft landscape areas. The proposed development will provide additional flood storage capacity when compared to the existing situation, reducing risk from surface water flooding post development.

382. The proposal would result in an increase in foul water flows from the site. Initial enquiries have been made by the applicant to Thames Water, who confirmed there is sufficient capacity to accommodate the new foul flows expected from the development. On this basis, the risk of sewer flooding is considered to be low.

383. The site and surrounding area is not located within an area within increased potential for elevated groundwater to be encountered. The semi-basement area within block C2 will be constructed using waterproofing techniques, in any event this is to be used as a plant room only.

384. The risk of flooding from reservoir sources is considered to be low. The natural topography of the site relative to the Grand Union Canal, which is at a lower level, means that should there be a failure of the canal walls it is unlikely that any flood water would flow towards the proposed development.

Sustainable drainage (SuDS)

385. Approximately 11,145 sqm of impermeable surface appears to currently discharge to the existing surface water sewers at the southern end of Atlip Road. The drainage strategy proposals include the following measures;

386. utilise water butts / irrigation tanks within the landscaped areas, for irrigation use;

- discharge surface water into the adjacent Thames Water surface water sewers (ground infiltration is not feasible);
- flow control and attenuation will be provided for both the Northern and Southern catchments, before connecting into the adopted surface water sewers at the southern end of Atlip Road;

- Increase in the amount of permeable areas through the landscape proposals;
- Introduction of green roofs

387. The surface water flow rates will be restricted to match the equivalent greenfield runoff rates up to a 1 in 100+CC event. The maximum flow rates from the site for a range of storms are set out in the FRA as:

- 2yr = 3.9 l/s
- 30yr = 8.1 l/s
- 100+40% = 12.6 l/s

388. The post development discharge rates would offer a betterment from a surface water flood risk perspective, there will be a 96% reduction in flow rates in comparison to the unattenuated discharge rates. This is welcomed in response to the surface water flood risk that the site currently presents.

389. The SuDS system will be managed and maintained privately and will be the responsibility of the future site owners. The applicant proposes this will be through a private management company acting on behalf of the site owners. Details of a management and maintenance plan will need to be secured for the lifetime of the development, and this can be done through condition or obligation prior to installation.

390. Thames Water raises no concerns in terms of surface water drainage, provided the drainage strategy follows the sequential approach to the disposal of surface water. They advise they have no issues either in terms of foul water infrastructure. It is requested a Piling Method Statement be secured by condition, to prevent and minimise potential for damage to subsurface sewerage infrastructure (the development is within 15m of a strategic sewer).

391. To summarise, the revised FRA and Drainage Strategy adequately assess the risk of flooding from external sources such as fluvial, sewer, groundwater and reservoir flooding, which is low. It also adequately assesses the risk from surface water flooding, with an appropriate mitigation and SuDS strategy proposed. The LLFA has no objection to the SuDS strategy principles, subject to recommended conditions.

Water consumption

392. The development aims to reduce water consumption. Efficient fittings are to be incorporated to meet a water consumption target of less than 105 litres per person per day. This is in line with London Plan policy SI5 and Local Plan policy BSUI4. A condition is recommended to ensure the development achieves or exceeds the water consumption target. Water efficient landscaping is also proposed, and is to be achieved through rainwater harvesting, used for irrigation.

Ecology, biodiversity, urban greening and green infrastructure

Ecological conditions

393. London Plan policy G6 D (Biodiversity and access to nature) seeks to ensure that proposals manage impacts on biodiversity and aim to secure net biodiversity gain. Local Plan policy BGI1 (Green and blue infrastructure) promotes the enhancement and support of biodiversity and ensuring that developments do not undermine the biodiversity of green chains.

394. To the site southern boundary, along the route of the railway, is a designated wildlife corridor. This extends partly within the application red line boundary, though is not severed by the placement of the proposed buildings.

395. An Ecological Assessment (comprising an Extended Phase 1 Habitat and Protected Species Scoping Survey and Bat Survey) has been provided in support of the application. The preliminary survey was undertaken in August 2022, and the bat emergence survey on 31 July 2023.

396. The assessment notes the railway corridor contains some scattered trees along its length, with sections of scrub. Habitats surrounding the site range from “low” to “moderate suitability for commuting and foraging bats, with areas of higher suitability further south and north-west.

397. Potential habitats within the site are buildings, hardstanding and scattered trees, none of which are

classed as “priority habitats” by the NPPF;

398. *Buildings* - Preliminary roost assessments were carried out for the existing buildings (for the Atlip Centre, 2 Atlip Road and the electric sub-station). The survey identified potentially suitable locations (crevices) for bats to dwell within the Atlip Centre, though overall the building was assessed as having “low” potential to host roosting bats due to the sites location in a habitat of “low” to “moderate” suitability for foraging and commuting bats and the presence of features potentially suitable for bats to roost. However, no bats were observed to roost in the building during the dusk emergence survey.

399. No further surveys are required at this stage, though the assessment recommends, should works not commence prior to May 2025, then prior to any works commencing a further single dawn re-entry survey be undertaken to confirm the buildings continue not to host a bat roost. This shall be secured by condition.

400. No bats, signs of bats, or features that could be used by roosting bats were observed inside or outside of 2 Atlip Road. The building is therefore assessed as having “negligible” potential to host a bat roost. Upon inspection there were no signs of bats observed at the sub-station building, this was also assessed as having “negligible” potential. No bats were observed emerging from the building during the dusk emergence survey.

401. *Hardstanding* - Most of the site consists of hardstanding, with the majority being located within the two car parking areas at the north and south of the site. At the peripheries of these areas is scattered scrub which has colonised the site or is encroaching from the adjacent properties. At the far north of the site there is an access track which has become overgrown and now comprises a mosaic of hardstanding, bare ground, scattered scrub and tall ruderals, with the vegetation being sparsely distributed.

402. *Scattered trees* - There are a number of small trees within the application site, most of which are located between parking bays in the southern car park. Many of these are fruit trees (apple, cherry, damson and crab apple). None of the trees on site have any features potentially suitable for use by roosting bats

403. The nearest statutory site of importance for nature conservation and ancient woodland is located c. 1.4km to the south of the site (Horsenden Wood Local Nature Reserve). At this distance away it is considered highly unlikely the proposals will have any adverse impact, as a result of a significant increase in recreational pressure.

404. During the surveys it was observed there were numerous pigeons occupying the roof of the Atlip Centre, and signs of nesting pigeons observed at 2 Atlip Road. Trees on site are unlikely to be used by nesting birds as they are small specimens. In view of this, the assessment advises that demolition and vegetation removal by undertaken outside of bird nesting season (March to August inclusive depending on weather conditions). If this is not practicable then areas to be cleared first are to be checked by a suitably qualified ecologist for nesting birds and, if any nests are found, works that would disturb the nest will not continue until all young have fledged the nest and it is no longer in use. This cautionary approach will be secured though condition.

405. In terms of other protected species, the assessment considers it unlikely that the proposals will have any adverse effect on these species, such as badgers, dormouse, reptiles or great crested newts (GCN). This is because the existing habitats to be affected are unsuitable or sub-optimal for use by these species, no signs of badger activity was observed on or adjacent to the site, and in the case of GCN there are no ponds within 250m of the site.

406. Ecological enhancements will be achieved across the site as a result of the detailed landscape proposals, and proposed green infrastructure. New planting is recommended to be predominantly native and wildlife-friendly species, and it is also recommended that integrated bird and bat boxes are built into the proposed buildings. These details can be confirmed through conditions.

407. An Ecological Management Plan (EMP) to support long-term maintenance and habitat creation is recommended to be secured by planning condition.

Biodiversity Net Gain (BNG)

408. The Environment Act 2021 became law on 9 November 2021. It will require (through amendments to the Town and Country Planning Act 1990) all planning permissions in England, with some exemptions, to

be granted subject to a new general pre-commencement condition that requires approval of a biodiversity gain plan. These plans will need to demonstrate that a development will result in a net gain in biodiversity of at least 10% above baseline levels using habitats as a proxy for biodiversity. This approach is referred to as Biodiversity Net Gain (BNG). As the application was submitted after 12 February 2024 the mandatory 10% net gain in biodiversity is applicable to the proposed development.

409. The DEFRA Statutory BNG Metric is a calculation tool created by Natural England to assess an area's baseline value to biodiversity, and then to compare that to the post-development value of the same site. This is then used to establish whether there will be any measurable net gain in biodiversity conditions on site.

410. BNG is an approach to development that leaves biodiversity in a better state than before. This means that where biodiversity is lost as a result of a development, the compensation provided should be of an overall greater biodiversity value than that which is lost, notwithstanding that losses should, in the first instance, be avoided.

411. The submitted BNG Report, includes the BNG Metric, and it is calculated that there are 0.27 area habitat units before development and 2.36 area habitat units after development. This increase will be achieved via introduced grassland, introduced shrub and planting and new green roofs and it equates to a gain of 2.1 area habitat units, or 779.34% above the on site area habitat baseline (i.e. the existing baseline). This level of increase vastly exceeds the mandatory national requirement of a 10% net gain, as well as the local plan requirement which is to demonstrate a net gain will be achieved. There are no linear features within the application site and as such no hedgerow or river units have been calculated. The significant increase in BNG is afforded positive weight in the planning balance.

412. Upon initial review of the submitted information the Ecology officer requested further information and some points of clarification. This was responded to by the applicant's ecologist, on 3 June 2024, addressing the matters raised.

413. The proposed development is considered to comply with Policy G6 of the London Plan and Local Plan Policy BGI1, and vastly exceeds the mandatory 10% net gain requirement. Conditions and / or planning obligations would be imposed to ensure that details of the landscaping and biodiversity enhancements are secured, including over the long-term and therefore a net gain is achieved post development and that it will be maintained over time. Further landscape details to be submitted for approval through condition shall also demonstrate the consideration that has been given to ensuring enhancement of the wildlife corridor to the south and improve connectivity along this green corridor.

Lighting

414. An external lighting strategy is still to be developed for the spaces in and around the buildings, including for the areas of public amenity space and public realm. These details shall be secured through condition, and the detailed lighting scheme will be expected to demonstrate how due consideration has been given to the potential impact lighting will have on the wildlife corridor to the south.

Urban greening

415. London Plan Policies G1 and G5 emphasise the importance of urban greening in development. Acceptable urban greening features include street trees, green roofs, rain gardens and hedgerows. Policy G5 recommends that a target Urban Greening Factor (UGF) score of 0.4 and should be achieved on predominantly residential developments. Brent Local Plan Policy BGI1 states that in meeting the urban greening factor major developments should place emphasis on solutions that support biodiversity.

416. The UGF score calculated for the proposed development is 0.4, which accords with relevant policy. This is achieved by proposed new landscaping features and green infrastructure across the site, including new trees and hedges, green roofs and SuDS features such as rain gardens. Urban Greening along Atlip Road will be significantly enhanced by the proposals. The measures proposed would be secured by condition to ensure that the anticipated UGF score is achieved or exceeded. It is considered that the potential for urban greening on site has been reasonably maximised and relevant London Plan (G1 and G5) and Brent policies (BGI1) are complied with.

Green infrastructure (trees and landscaping)

417. London Plan Policy G1 states that development proposals should incorporate green infrastructure. Policy G4 states that development proposals should where possible create areas of publicly accessible

open space. Policy G7 states that development proposals should ensure that, wherever possible, existing trees of value are retained; if trees are removed, there should be adequate replacement based on the value of the benefits of the trees removed, using appropriate valuation system; and the planting of additional trees should generally be included.

418. Policy DMP1 seeks to retain high amenity trees and landscape features and provide appropriate additions or enhancements. Trees are a key component of green infrastructure and help to create resilient and more sustainable development. Policy BGI2 (Trees and Woodlands) seeks to ensure that trees are protected as much as possible and to re-provide where loss is unavoidable

Trees

419. An Arboricultural Impact Assessment has been submitted with the application, identifying twelve trees on site which will be removed and replaced as part of a comprehensive landscaping scheme for the site. These trees for removal are relatively small in size, and the council's Tree Officer raises no objection to their removal. Additionally, there is one group of three Silver Birch trees situated off site which are identified to be retained. The report notes that site boundary fencing will provide adequate physical protection for these off site trees, which are not close enough to the boundary to be impacted by the proposals.

420. A large number of new trees of various species groups (approximately 160) are proposed to be planted as part of a comprehensive landscaping scheme. The proposed soft landscape plan details (indicatively) the location and species of new trees to be planted and the Design and Access Statement includes a tree planting strategy. Further details would be secured through condition.

421. The area falls within the Lower Super Output Area (LSOA) rated as a high priority area for improving tree equity through planting by the Tree Equity Score UK map. The current canopy cover is shown as 5% with the goal set at 20%. As a result, additional tree planting should be targeted in this area. It is noted that no significant sized trees are proposed fronting onto Rosemont Road, however this is due to the planters being situated on the viaduct and therefore scope for any larger trees is quite limited in this location.

422. The proposed redevelopment development will result in a significant net increase in trees on site and the council's Tree Officer raises no objection to the proposed tree strategy, subject to the submission of a detailed landscaping scheme to give further clarity over the new trees, the choice of species and their location, which can be secured by condition.

Landscaping

423. The existing site is located in proximity to a range of public open spaces, with One Tree Hill Recreation Ground, Mount Pleasant Open Space and the Grant Union Canal within a 400m walking distance, however the immediate site lacks open space.

424. A detailed and considered landscaping scheme has been submitted as part of the Design and Access Statement, which proposes to create a distinctive neighbourhood with an accessible, safe and green network to provide a setting for public life. The landscaping strategy includes c.1, 154 sqm of new publicly accessible spaces of public realm and amenity spaces at ground floor level over three main areas. Atlip Gardens, located to the centre of the site set between Ealing Road to the west, the nature-corridor of the Grand Union Canal to the east, and connected via Atlip Road will provide publicly accessible green space and incorporate play space and outdoor seating. The peripheral areas of the Gardens will feature planting to ensure privacy of adjacent frontages, whilst the centre of the site will be more open with low hedges to define boundaries for areas of informal play. A second publicly accessible area is proposed through Atlip Mews, a tree-lined walking route opening to the south of building A and extending alongside the railway arches. It will feature a series of squares and courtyards with planting beds to include native species plants to reinforce the biodiverse corridor function for this area. The feel of Atlip Road, the main connecting route between the Alperton station/Ealing Road and the Grand Union Canal will also be improved with new soft landscaping elements proposed alongside the street, including tree and verge planting. The new planting on Atlip Road will help to encourage for the street to be seen as a pedestrian priority area from Ealing Road whilst it will also improve surface water attenuation.

425. Other communal courtyards for residents only access are proposed, specifically to the north west and north east of building C with gardening, growing gardens and play spaces; and to the south of building B

under the form of a communal terrace with biodiverse planting. The roof terraces proposed on each of the buildings will be accessible to residents to provide additional amenity space for each building.

426. As referred above, the proposal will include a significant net increase in new trees across the site. The walking route on Atlip mews, the amenity courtyards and quality s through the site will be finished in permeable hard surfaces, whilst to the north east of the site a landscape buffer is proposed which will act as rain gardens as part of the site wide SuDS strategy. This will be a substantial improvement as the majority of the site as existing consists of impermeable surfaces, with limited (and low quality) soft landscaping.

427. On the upper levels, green roofs are proposed which will help reduce heat reflection. These areas will feature shrubs plantings which will provide ecological and biodiverse benefits. Further details of specifications for these green roofs can be secured by condition.

428. Consideration has been given to people of all ability and materials for hard surfaces have been selected to ease movement for disabled and abled pedestrians, cyclists and vehicles. Further details shall be secured by condition.

429. The Design and Access Statement notes that new soft planting will be maintained by the management company responsible for each building. Further details in relation to the management of publicly accessible spaces, hardstanding areas and furniture will be secured by a relevant condition.

430. With regard to the landscape strategy, the proposal is considered to add value in terms of visual amenity and biodiversity within the site. The provision of new green infrastructure and publicly accessible open space within the development are welcomed and represent a well-considered approach in terms of landscaping and improved connectivity. The proposed landscaping will be a significant betterment compared to the existing site conditions with a net increase in trees, soft planting, biodiversity value and enhanced public realm across the site. The proposed garden roofs and permeable paving would improve sustainable drainage within the development. The proposals are considered to be in accordance with London Plan policies G1 and G4, and Local Plan policies DMP1, BGI1 and BGI2, subject to the submission of a detailed landscaping scheme showing details of new trees and their location, specification of new planting on the green roofs and details of long term maintenance. This can be secured by condition.

Transport and access considerations

431. London Plan policy T1 sets a strategic aim for all development to make the most effective use of land reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated. Local Plan Policy BT1 seeks to promote sustainable patterns of development in the borough, minimising the need to travel and reducing the dependence on private motor vehicles.

432. The application is supported by a Transport Assessment - *RevA* (TA), which considers the potential effect of the proposed development on the local highway and transport network. The TA has been prepared in accordance with the requirements outlined in the NPPG and TfL's Healthy Streets Transport Assessment guidance and is also supported by a Framework Travel Plan (FTP) and Delivery and Servicing Plan (DSP).

Access

433. Primary means of access to the site currently is via Atlip Road, this is a privately maintained access road, leading from Ealing Road at its northern end to a pedestrian footbridge over the Grand Union Canal, at the southern end of it. Ealing Road, to the north is a local distributor road and bus route. The site is situated outside of Controlled Parking Zone "E". Bus stop clearway and zebra crossing along the northern site frontage (Ealing Road) prohibit stopping at all times. The site is directly opposite Alperton Station and has a PTAL 4 ('good')

434. It is proposed that Atlip Road will continue to be the primary means of access for the proposed development, for both vehicle and non-vehicle access. Pedestrian entrances will be from Atlip Road, with suitable footway connections along either side. A new pedestrian connection is proposed in the form of a new route opened up alongside the existing railway viaduct, to the west of block A. This will improve pedestrian connectivity and site permeability. New pedestrian crossing points are to be provided along Atlip Road, these will facilitate access between the sites either side of the road. Dedicated entrances for

each block are proposed to serve internal long-stay cycle stores.

435. Vehicle crossovers from Atlip Road will provide access for the accessible car parking spaces (and some servicing activity). With the overall number of crossovers being reduced compared to what is existing, which will benefit pedestrians using Atlip Road.

436. Traffic calming measures proposed along Atlip Road, include;

- General carriageway width reduction to 5.5m, which will help to encourage lower speeds and facilitate widened footways, tree planting and inset parking bays;
- A raised narrowed landscaped section towards the centre of the site where vehicles will need to give way

437. These alterations along Atlip Road are welcomed, and will serve to improve its appearance and enhance pedestrian and cyclist access, in accordance with Healthy Street principles.

Parking

438. London Plan policy T6 strongly supports a move towards more sustainable travel choices, and expects car free development (in which only designated Blue Badge parking is provided) to be the starting point in accessible locations such as this. Brent Local Plan policies in chapter 6.8 also support car free development in places that are well connected by public transport, like the application site.

439. The existing (private) surface car park which primarily serves the Atlip Centre has c.135 spaces. This car park is proposed to be removed in order to accommodate the redevelopment, its re-provision is not proposed. Overall, there will be a net reduction of 115 car parking spaces on site.

440. As the site has good access to public transport services (PTAL 4), up to 0.5 spaces per C3 dwelling are allowed, whilst the co-living units would be allowed up to one space per 10 bedrooms. It should be noted that these are maximum parking standards. The commercial space is allowed up to one space per 100sqm (assuming office use), and any parking for the community space (aside from disabled or operational parking) would need to be justified through the TA.

441. In accordance with the car parking allowances for Brent (set out in Appendix 4 of the Local Plan) and the standards set out in tables 10.3 and 10.4 of the London Plan, the overall parking allowance is calculated to be 277 spaces, so the proposed provision of 20 spaces (including 17 accessible spaces (14 for the C3 residential units and 3 for the co-living units), 1 accessible space associated with the community centre and two Car Club spaces would be well within the maximum numbers allowed in this location.

442. CPZ's have been proven to be an effective means of restricting on-street parking to ensure it remains available for the use of existing residents when new residential developments come forward. The provision of CPZ's mitigates the impacts of overspill parking onto the surrounding road network as a result of the identified need for development in the Alperton Growth Area. The development is proposed to be car-free, save for proposed accessible parking space provision, which is acceptable as the site is located in a sustainable location. To ensure that the development does not lead to overspill parking problems in the area, a car free agreement will be sought to remove the right of future residents to on-street parking permits in any existing, or future CPZ's operating in the area. This is in line with the Council's wider policies on promoting non-car access to reduce congestion and pollution.

443. It is noted that several nearby streets (such as Sunleigh Road, Woodside Avenue and Carlyon Road) currently lie outside of any CPZ. However, Transport officers consider that plentiful S106 contributions have already been secured towards the implementation of new and extended CPZ's in the wider area from other approved developments that lie closer to those streets, so there is already provision to address parking problems as they arise should residents wish.

444. In respect of car parking provision, TfL commented that, the quantum of accessible parking is in line with London Plan policy T6 for the C3 residential units, though noting the provision of three spaces for the co-living units falls short of requirements. Additionally, there does not appear to be provision to increase the provision of disabled parking spaces to meet the total 10% provision required should demand arise in the future. The applicant has subsequently provided further justification to TfL for the proposed number of accessible spaces, which is accepted.

445. Transport Officers support the quantum of accessible parking provision, which is considered sufficient to meet the requirement for a space for 3% of residential units, as set out in the London Plan, leaving three spaces for the co-living block (A). These three spaces equate to just a space per 0.7% of units, but this lower provision has been justified in the TA on the basis that the occupiers of such units would have a much younger age profile (under 40) than the general population and would therefore be far less likely to possess Blue Badges. The overall level of disabled parking is therefore considered to be sufficient to meet future occupier needs, and it is noted is broadly line with other co-living development elsewhere in London, where parking provision has ranged from 0.5% to 1% of units. In addition to the accessible parking provision, residents of the co-living block will also have future access to two on-site car club bays that are proposed which will further reduce residents need to own a car.

446. In summary, the developments proposed car parking provision is;

Land Use	**Quantum**	**Parking Quantum**	**% Provision**
C3 residential	464 units	14 disabled spaces	3%
Co-living	421 units	3 disabled spaces	0.7%
Community use	505sqm	1 disabled space	N/A
Site-wide	N/A	2 car club spaces	N/A
Total		**20 spaces**	

(table 1.7)

447. This level of accessible parking, including for the co-living units, is supported by Transport officers, and in terms of layout, the spaces are shown suitably located for each of the residential blocks, with suitable dimensions shown.

448. A Car Park Management Plan (CPMP) has been submitted setting out how eligibility for parking spaces will be checked and how correct use of the spaces will be enforced through penalty charge notices. The CPMP also confirms that all spaces will include electric vehicle charging points from the outset, which is welcomed. Conditions will ensure the CPMP is implemented, and that charging provision is provided and maintained.

Cycle parking

449. London Plan Policy T5 cycle parking standards require the provision of 848 long-stay and 12 short-stay spaces for the residential dwellings. Approximately four long-stay and 13 short-stay spaces should also be provided for the commercial uses and community floorspace. Details provided for the C3 residential blocks meet the long-stay requirements, with spaces provided in a suitable mixture of two-tier racks and 'Sheffield' stands to accommodate different types of cycle.

450. In the case of the co-living units (building A), the LSPBSL LPG sets a benchmark cycle parking standard of 0.75 spaces per person, and notes that flexibility of this standard may be applied based on the site location. The applicant has set out justification in the TA for the quantum of cycle parking for the co-living units and that it is proposed to provide cycle parking in line with the requirements for student accommodation, meaning 0.75 long-stay spaces per unit and one short-stay space for every 40 rooms. This would equate to 316 long-stay spaces and 11 short-stay spaces.

451. It is proposed to provide 316 long-stay spaces, and 11 short-stay spaces for block A. Notwithstanding this, Transport officers request a condition be secured as part of any approval to secure submission and approval of further details of bicycle parking for the co-living units to confirm provision will be in line with the 0.75 ratio.

452. The overall proposed cycle parking provision for all uses is as follows;

Land Use	**Quantum**	**Cycle parking provision long-stay**	**Cycle parking provision short-stay**
C3 residential	464 dwellings	848	13
Co-living	421 dwellings	316	11
Café / Class E	234sqm	2	7
Workspaces	124sqm	1	6
Community Centre	505sqm	1	0
Total		**1167**	**36**

(table 1.8).

453. All long-stay cycle parking will be provided in secure, covered and lockable cycle stores in accordance with London Plan and LCDS standards. Suitable LCDS compliant lift access has been incorporated for cycle stores that are not located on the ground floor. Overall, 5% of cycle parking spaces will be designed to accommodate larger bikes. Each residential block has its own long-stay cycle store, in locations that are safe and convenient to access. Short-stay spaces will be dispersed throughout the public realm, in locations with good passive surveillance.

454. It should be noted that TfL has advised there are no outstanding queries in respect of cycle parking provision.

Deliveries and Servicing

455. It is currently the case that servicing, deliveries and refuse collection is undertaken from Atlip Road, with some limited on-site servicing in areas. Occasional servicing is undertaken from Ealing Road.

456. Post development loading is generally proposed to take place off the public highway from Atlip Road, with three 10m long loading bays shown close to the refuse stores and the commercial floorspace that delivery and refuse vehicles can use. It has also been shown where there is space for refuse vehicles to collect away from Atlip Road. Refuse vehicles will be able to collect from within 10m of all waste stores. Tracking diagrams have been submitted to show that refuse and other delivery vehicles can turn around in Atlip Road.

457. For the proposed workshop units along the northeast passage to Ealing Road, these will have ready access to an existing inset loading bay on Ealing Road where small vans can load, adjacent to the site access (expected demand is low at c. 1 delivery per day). Refuse collections for the community centre can also take place from this loading bay.

458. A DSP has been submitted to show how deliveries will be managed. This predicts up to 88 delivery vehicles serving the site each day, with up to eleven in the busiest hour (9-10am). The three proposed loading bays along Atlip Road would be sufficient to satisfy this demand, with many of the deliveries likely to be in small vans.

459. To help to reduce delivery movements, a centralised delivery locker system with on-site staff will be established, so that any deliveries made whilst residents are out can be securely left on site, thereby avoiding the need to make repeat visits.

460. The DSP is welcomed, although as a predominantly residential development, the likely benefits are more limited than would be the case for a commercial use. A final DSP shall be secured by condition.

Emergency vehicle access

461. Access for emergency vehicles will be as existing, via Atlip Road. The design of the new public square in front of blocks C and D also allows access by fire tenders, if and when required.

Construction Logistics

462. The applicant has submitted an outline Construction Logistics Plan , *version 1.0* (OCLP), drafted in line with TfL's guidance. The plan sets out key transport-related matters during construction of the proposed development and this document shall be used as a reference point for a detailed CLP that will need to be developed at a later date, submitted and approved once a main contractor has been appointed, and before commencement of works on site (this is to be secured by condition).

463. The OCLP envisages there being a 270 week construction programme, though this is subject to change. All construction traffic will enter and leave the site via Atlip Road, with off-street loading areas for each hoarded block provided off Atlip Road that vehicles can reverse into. In this way, unobstructed access will be maintained along Atlip Road for vehicles and pedestrians.

464. Prior to the commencement of any works, the site will be registered with the Considerate Constructors Scheme, with a commitment to the Code of Considerate Practice. Proof of registration shall be submitted to the Council, which can be incorporated into a future more detailed CLP.

465. The OCLP details construction hours of operation (Mon-Fri 08:00 to 18:00 and Sat 08:00 to 13:00), commits to no works on Sundays or bank holidays (without prior consent), construction methodology, site set up and demolition, site access and vehicle routing, strategies to reduce impact, mitigation measures, waste management / recycling, lighting, estimated vehicle movements and other relevant matters.

466. In respect of vehicle routing, the sole vehicular access to the site is via Ealing Road as such vehicles will be required to route to the site from the north. Vehicles will be able to route via either the eastern or western arm of Ealing Road, though it is expected most HGVs would route via Hanger Lane. Details will need to be confirmed in the final CLP.

467. As a principal contractor has not yet been appointed for the construction it is currently not known how many vehicle movements the construction of the development will generate. However, based on the indicative programme, the quantum of development and previous experience working on schemes of similar scale, it is estimated that the construction would generate around 48 construction vehicle trips (24 vehicles) per day in the peak construction period (Demolition Phase).

468. The final detailed CLP will need to provide details of the number of vehicle trips to and from the site during demolition and construction, along with any mitigation measures to reduce impacts. This will be secured by condition.

469. The developer and appointed contractor will be expected to engage with the owners of the private service road and the businesses along it as part of the preparation of the detailed CLP, and final details of construction vehicle access arrangements which will be secured through this condition.

470. There are no objections on Transport grounds, subject to a detailed CLP being secured through a pre-commencement condition once a contractor has been appointed.

Refuse

471. An Operational Waste Management Strategy (OWMS) has been submitted in support of the application, and this considers the potential impacts that may arise from waste generated during the operational phase.

472. In terms of refuse storage capacity, a suitable number of bins are shown for the residential blocks, although the bins in the stores for block B are tightly spaced, so will require effective day-to-day management to ensure empty bins are always easily accessed and not obstructed by full bins. Space is provided in each building for any bulky waste, and management of this is the responsibility of on site facilities management. Residents will need to contact the Council to arrange collection of such items.

473. The various commercial uses are all provided with commercial waste stores, and alongside the co-living units (building A) would be expected to arrange their own private refuse collection. It is expected a commercial waste contractor would be appointed to service the development once operational on an agreed schedule. In respect of the co-living units, this is considered necessary due to the reduced storage capacity being provided internally. The applicant is committing to fund additional refuse / recycling and food waste collections for the co-living units to ensure there isn't overspill, and this on-going commitment (to also apply to any future site owner) will be secured through the s106 legal agreement in the form of a Waste Management Plan. Details of which will also need to be set out in the final DSP to ensure there is consistency across these related Plans.

474. As referred above, refuse collection vehicles will be able to collect from within 10m of all waste stores, with level (step and kerb free) and convenient access for collection crews. Vehicles will have sufficient space to manoeuvre and leave in forward gear.

Active Travel Zone, and Healthy Streets Assessment

475. An Active Travel Zone assessment (ATZ), including night-time assessment has been carried out in line with the TfL Transport Assessment guidance, and this is submitted as part of the TA, in order to assess the quality of pedestrian and cycle links from the development site to points of interests, such as schools, shops and health centres, and assess how future users of the site will be able to make key journeys from the site to support car-free lifestyles.

476. The assessment has been undertaken for five key routes around the site, in order to identify any

shortcomings or accident problems that have arisen and identify any areas for improvement.

477. Recommended measures to improve the Healthy Streets ratings of the routes include junction improvement works at Chaplin Road / Ealing Road rear service road and Woodstock Road / Vincent Road, general improvements to Bridgehill Close, pedestrian crossing improvements at Glacier Way / Ealing Road and lighting improvements at the Atlip Road footbridge over the Grand Union Canal.

478. Two of the routes assessed passed through the nearby Ealing Road / Mount Pleasant signalised junction, where there is a lack of pedestrian crossing facility on its Mount Pleasant arm. This junction is included in a modelling study being undertaken for the Grand Union development on Beresford Avenue to identify potential improvements, so a preferred junction arrangement is likely to be identified in due course for which funding would need to be found.

479. The TA has offered no specific funding towards any of the above suggestions though, so it is recommended that a general funding contribution of £100,000 is provided towards these various identified improvements in the vicinity of the site, and this would need to be secured via the S106 Agreement. The applicant is agreeable to providing this contribution.

480. TfL consider that the southern section of the pedestrian footbridge crossing the Grand Union Canal would benefit from improved lighting, and that way-finding signage should also be provided to improve connectivity. These measures could be delivered through the contribution, if considered a priority over other identified improvements.

Travel Plan

481. To help to manage travel movements by residents, staff and visitors, a Framework Travel Plan (FTP) has been submitted with the application, to be overseen by a Travel Plan Co-ordinator. This sets out a range of measures, with the aim of keeping car trips amongst residents to 1% of the total trips, whilst increasing cycling trips by 8% of the total over a period of five years.

482. Measures included in the FTP include the provision of information on notice boards and in a Travel Pack for residents, including transport information and journey planning advice, provision of bicycle maintenance facilities and promotion of cycling activities and campaigns. Free membership of the on-site Car Club to each new household for a period of three years is also proposed.

483. Surveys of progress towards meeting Travel Plan targets will be undertaken one year, three years and five years after occupation. The FTP is considered to be acceptable and should be submitted for final approval of targets once the initial survey has been undertaken, and secured via planning obligation.

Trip Generation and impact of proposed development

484. The TA has considered the likely number of trips that would be generated by the development. Residential trip estimates have been based upon comparisons with twelve other residential developments in outer London with good public transport access, whilst trips for the co-living units have been based upon survey data for a similar site in Park Royal.

485. The above approaches are considered acceptable by Transport Officers and result in an estimated total of 71 arrivals / 390 departures in the am peak hour (8-9am) and 275 arrivals / 100 departures in the pm peak hour (5-6pm) by all modes of transport.

486. With regard to modal share, the residential car trips have been reassigned to public transport and cycling to reflect the low level of parking proposed, whilst it is assumed that no employees will drive to the site due to the absence of commercial car parking.

487. As a result, the development is estimated to generate just three car trips in each peak hour. This is not significant enough to have any noticeable impact on the local highway network and would also be far lower than the amount of traffic generated by existing uses on the site.

488. In terms of public transport, the development is estimated to generate 115 bus trips in the morning peak hour and 89 in the evening peak hour, plus multi-modal rail and Underground trips to stations other than Alperton. These trips have then been assigned to the seven different routes passing the site, based upon likely trip origins and destinations gleaned from Census origin-destination data for work trips.

489. As a result, bus services in the area are estimated to see an additional 1-1.5 passengers per bus on average. The most affected routes are the 487 southbound and northbound services along Ealing Road (79, 83, 297 & 483) towards Wembley Central. TfL, as operator of these services, wish to secure a financial contribution of £190, 000 towards enhancing service frequencies in the area based upon these figures.

490. For rail trips, 139 trips in the morning peak hour and 108 trips in the evening peak hour are expected to be made by Underground. These have also been distributed according to likely origins and destinations, with the vast majority of trips expected to use the Piccadilly line eastwards.

491. An assessment of the station gateline capacity has therefore been undertaken for Alperton station. This suggests that the station will continue to require three gates and with four gates already available, there is already sufficient capacity.

492. However, although the station gateline capacity may be adequate, the absence of step-free access remains an issue for the station. A feasibility study has recently been undertaken by TfL on providing lifts to the platforms and this has identified a likely cost in the range of £10-15m. Contributions from developments in the area are therefore being sought towards this infrastructure provision and a contribution of £600, 000 has been requested by TfL, which if secured, will allow TfL to progress this. The applicant has agreed to the requested contributions towards buses and step free access, which were agreed by TfL during the course of this application in discussion with the applicants and officers, in recognition of the challenging scheme viability conditions and in order to prioritise affordable housing delivery.

493. Officers agree that there is a notable viability deficit, and that while the Council are very supportive of the need to secure step free access and enhancements to bus services, we would not support any reduction in the amount of affordable housing being proposed (as a consequence of securing the higher contributions previously requested by TfL), so weigh the benefits associated with the affordable housing over any shortfall in transport contributions secured.

494. The loading capacity for Piccadilly line trains through Alperton has also been assessed and this shows the trains to be currently operating at a maximum of about 30% capacity on this part of the line, leaving plenty of spare capacity to cater for additional trips from the development. National rail trips are expected to amount to 55 trips in the morning peak hour and 43 trips in the evening peak hour. These would be spread across a number of stations in the wider area and are not therefore considered likely to have any noticeable impact on train or station capacity.

495. In summary, a car-free development is acceptable in this location and adequate cycle parking provision would be made, together with appropriate arrangements for deliveries and servicing to be undertaken without affecting the flow of traffic on the local highway network, and other managed arrangements for within the site itself in order to minimise movement within the site at the expense of the new public realm and amenity areas. The site layout also facilitates improvements to Atlip Road, which are supported. Subject to the conditions and planning obligations recommended, including any financial contributions requested being secured through the s106 agreement, the proposal is considered to be acceptable in transport terms.

Consideration of impacts on existing TfL infrastructure

496. Site allocation policy BSWSA3 identifies one of the considerations to the sites redevelopment as being, proximity of any development close to existing rail infrastructure, and the need to take into account operational requirements and the potential need to provide mitigation for any impacts.

497. TfL Infrastructure Protection (TfL IP) were consulted due to the proximity of the proposed development to existing Piccadilly lines, the viaduct and other associated TfL assets. Buildings A, B1 and B2 have units, some including projecting balconies, facing towards these assets.

498. TfL IP issued an initial holding objection, due to concerns the proposal would significantly increase the potential risks to the operational railway compared with the existing building (the Atlip Centre). The concerns and comments raised included (but are not limited to) the following;

- Proximity of buildings A, B1 and B2, which include a combination of balconies, external roof terraces and opening windows fronting the viaduct. Which, it was considered significantly increases the potential risks of dropping or falling objects (intentional and unintentional) onto the railway during and

after construction and when the buildings are in use / occupied.

- TfL IP requested the applicant undertook further technical assessments in the form of a risk assessment, Trajectory Study and Glare Study, to fully assess the potential risk (and identify any necessary mitigation measures).
- Detailed comments in relation to the landscape proposals, and the potential for these to impact on future access to the viaduct, railway arches and TfL / LUL assets.
- A requirement to mitigate the effects of noise and vibration from the operation of the railway on proposed residential accommodation.

499. Following further discussions between the applicants and TfL IP, the requested risk assessment (which includes assessment without and with proposed mitigation measures), Glare Study and Trajectory Study were all undertaken and provided to TfL IP for review. These were provided alongside the proposed design changes to external balconies to building B1, which result in changes to balcony positions, a reduction in the number of balconies in building B1 facing the railway, so that the nearest distance from balcony to viaduct is increased to 7m, and a balustrade height increase to 1.5m including additional solid panels.

500. A reflected Solar Glare Study (May 2024) was carried out, as requested by TfL IP, to identify the potential for solar dazzle (from the proposed development) affecting train drivers passing the site due to sunlight reflected from the proposed buildings. Seven viewpoints were assessed, which represent north and south bound trains passing the site.

501. The study concludes that solar glare reflections will only effect northbound trains, that these reflections will be of low frequency (rated as minor adverse) and that any veiling glare is unlikely to be caused. These reflections should not cause glare to passing train drivers and that consequently mitigation is not essential. Notwithstanding this, mitigation in the form of low reflective glass has been applied to the development where required as a precaution.

502. The Trajectory Study is based on the balcony changes and assesses the risk from objects falling unintentionally as well as intentionally (i.e. thrown) from balconies and external amenity areas at roof level, onto the railway lines, from buildings A, B1 and B2. The study results concluded:

- Risk of impacts on the viaduct of objects released accidentally from buildings A, B1 and B2 relate only to balconies and is negligibly small.
- Risk of impacts on the viaduct of objects released intentionally from buildings A, B1 and B2 is finite but acceptably low when viewed in context with other sites.
- As the risk of accidental impacts is negligibly low, there is no projectile related rationale for increasing balustrade heights from 1.5m.

503. Residual risk of intentional throw on the railway (and other risks) will be mitigated and managed in any tenancy agreement, according to the submitted risk assessment.

504. TfL IP has confirmed, on the basis of the proposed design changes, and requested supporting documents, that they have no further objection to the development subject to recommended conditions to ensure the development can proceed and be operated without impacting on TfL infrastructure.

Meanwhile Use strategy

505. Local Plan policy BE4 sets out all phased major developments within town centres or growth areas are required to provide an appropriate Meanwhile Feasibility Study (MFS) and if feasible, an appropriate Meanwhile Strategy, to make use of vacant / under-utilised sites or buildings for occupation by beneficial temporary uses.

506. A MFS has been submitted, which identifies units 5, 6 & 7 within the existing Atlip Centre building as suitable for possible meanwhile uses given these are vacant and in the best condition for re-use. The applicants have been in discussion with Council Regeneration Officers with a view to agreeing a Strategy and identifying suitable temporary occupants for the identified units. Whilst agreement has not been reached at the current time a planning condition is recommended which will require the applicant to continue to engage with Regeneration Officers post Committee, so that an appropriate Strategy can be

agreed and implemented thereafter prior to the site being redeveloped.

Phasing of development

507. Due to the proposed scale of development this will be a multi-building phased development, with construction anticipated to take place over a 62 month period. The planning application is based on an indicative high level construction / build programme that will become more refined, subject to planning permission being approved, and delivery partner identified. The sites redevelopment would involve demolition of existing buildings in a staged fashion, with the Atlip Centre expected to be first to be demolished.

508. Construction of the new development is expected, currently, to begin with buildings B1 and B2, followed by C2, D2, C1, A and D1 in that order. The access road works would be completed at the end. It is anticipated the new community centre (D1) will be delivered towards the end of the build, as its success as a venue will be heavily influenced by the proposed improvements to the public realm, landscaping and enhancements to Atlip Road, alongside the critical mass from new residents moving into the proposed development. This is considered reasonable, though as the programme set out is high level only, and subject to change, a planning condition is to be secured requiring the submission and approval of a detailed phasing plan / programme, following the appointment of a delivery partner. The development would then need to be built out in accordance with any approved details.

Employment, Skills & Training

509. London Plan policy E11 states that development proposals should support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate. Brent Local Plan policy BE1 also supports such opportunities being provided through new developments and sets out the requirement for an Employment, Apprenticeship and Training Plan (EATP) for all developments of 5, 000sqm or more or sites capable of providing 50 or more residential units, to be prepared in partnership with Brent Works or any successor body. Brent's Planning Obligations SPD also seeks to maximise employment and skills opportunities through new development, for the boroughs residents.

510. Existing employment on site will be displaced as a result of redevelopment, with existing levels estimated to be up to 126 FTE jobs, using the HCA Employment Density Guide (2015). The construction works are estimated to generate temporary employment at an average of 275 FTE jobs in any given month over the anticipated five year construction period. The operational (i.e. end-use employment) would deliver a range of employment generating uses, estimated to be in the region of 24-54 FTE jobs, resulting in a net loss of jobs on site which is considered will have a low magnitude of impact. Furthermore, some of the existing businesses operating on site will re-locate (i.e. Clay Oven), so it is expected a proportion of existing jobs on site will be displaced to other locations rather than being lost.

511. As required by policy, the development will secure an Employment and Training Plan for the provision of training, skills and employment initiatives for residents of the Borough, relating to both the construction phase and operational phase of the Development. This Plan, along with associated support fees will be secured as s106 obligations, as set out in the draft Heads of Terms, and will be a benefit of the proposals afforded positive weight in the planning balance.

Foul sewage and utilities assessment

512. This assessment identifies that a new location for the relocated substation on site will need to be provided, and further details of this shall be secured through condition. It is also likely that a range of disconnections, diversions, reinforcements and new connections, with electric, water, gas, broadband and other providers will be required to cater for the proposed development. These costs will be met by the developer.

Equalities

513. 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).

Environmental Impact Assessment

514. Ahead of submitting the application and in accordance with Regulation 15 of the EIA Regulations, the applicants submitted (in July 2023) a formal request to the Council for an Environmental Impact Assessment Scoping Opinion. On 11 August 2023, the Local Planning Authority published its Scoping Opinion response, which confirmed agreement on the topics proposed to be scoped into the Environmental Statement, including matters relating to socio-economic, wind microclimate, daylight, sunlight and overshadowing, and townscape, heritage and visual impact. These topics have been comprehensively considered and assessed within relevant chapters in the submitted ES and further updated where relevant (including Statements of Conformity) to take account of scheme revisions during the course of the application being considered.

Planning balance

515. The proposal will deliver wide ranging public benefits (encompassing economic, social and environmental benefits), some of which attract greater weight than others. These material considerations weigh in favour of the development, and are balanced against the planning harm identified, in undertaking a planning balance judgement.

516. The provision of a significant number of new homes (including accessible homes) contributes to increasing London's (and Brent's) housing supply, meeting housing need, including the more acute need for affordable homes at a level that exceeds the maximum reasonable level that the scheme can viably support. This is a benefit that is afforded significant weight.

517. The site will deliver new publicly accessible open space, benefiting the local community (existing and new), and it will deliver significant public realm improvements. A significant net increase in trees, green infrastructure, a net gain in biodiversity (well in excess of the minimum 10%) as well as a contribution to enhance off site play space / open space in the locality all represent social and environmental benefits that weigh in favour of the development.

518. Economic benefits will follow in terms of new employment as a result of development, both during the construction and later occupied phases, including the proposed workspace which has been designed to attract local creatives to occupy and strengthen the Creative Enterprise Zone. Indirect economic benefits will follow as a result of local expenditure in the local economy. These economic benefits weigh in favour of development.

519. The proposed standalone community centre, which will offer flexibility of use for the local community (existing and new), will be a public benefit to the local area. Contributions to be secured towards public transport infrastructure (towards buses and step free access at Alperton Station) will also represent public benefits that weigh in favour of development.

520. Reduced surface water flood risk across the site will follow through the SuDS measures proposed and buildings of high quality design will positively contribute to the local character, which represent environmental and social benefits that weigh in favour of development.

521. As the report acknowledges, redevelopment of the site at the scale and density will lead to some negative effects to daylight, sunlight and increased shading for nearby sensitive receptors, causing harm to nearby residential amenity. There will be visual harm caused by the scale of development, resulting in moderate adverse effects to residents in nearby low rise residential properties. Conflict with site allocation policy BSWSA3 arises owing to the loss of gym and banqueting hall facilities on site, though this harm is considered to be justified (in part) due to alternate provision that has been identified locally and the proposed Class F2 floorspace, as set in the relevant sections above. The absence of a payment in lieu being secured (in lieu of the co-living units) would result in very limited harm also. Temporary negative effects would occur during demolition and construction phases, as a result of noise and disturbance, and to TV / radio reception. However, these effects will only be for a temporary period, and proposed mitigation measures are to be secured through condition(s) to help reduce the magnitude of any temporary impacts.

522. No harm is identified as resulting to any and heritage assets.

Conclusion

523. The proposed development would make efficient use of the land, a brownfield site, in a highly

sustainable location, this is in line with national, regional and local policy and is an appropriate form of residential led mixed-use development within Alperton Growth Area. The proposed land uses are consistent with the overarching aims of site allocation policy BSWSA3. Loss of the existing banqueting facility and commercial gym have been satisfactorily justified, and it is acknowledged their re-provision would be prejudicial to other key policy objectives for the site, and the borough as a whole, including optimising housing delivery, and this is something has been considered in the overall planning balance.

524. The provision of C3 housing and co-living homes at the quantum proposed positively contributes towards meeting the identified strategic London wide need for housing. It will also contribute towards housing targets within the borough, and deliver much needed affordable housing at a level in excess of the maximum reasonable amount. Officers weigh the benefits of providing more affordable homes above the shortfall in private family sized homes in the scheme overall. The affordable housing is to be secured by s106 agreement.

525. The site is identified in the development plan as an appropriate location in the borough where tall buildings can be located, and the proposed scale and massing of the buildings would respond well to the site's tall building zone and Alperton Growth area location, as well as the established and emerging context, where tall buildings of a comparable scale already feature in locations close by. It has been successfully demonstrated that the design approach is suitable, of high quality (a result of thorough design review engagement) and meets the key criteria of London plan policy D9. No harm has been identified to any designated heritage assets, as the relevant section of this report acknowledges. Owing to the dense urban pattern of development in the locality, both established and emerging, supporting technical assessments identify there is expected to be some adverse amenity effects on daylight and sunlight conditions to some existing nearby sensitive receptors. These adverse effects would be noticeable in some cases, but are to be expected with development proposed at scale which seeks to make most efficient use of land within an urban context that includes a range of building heights. These harmful effects as well as any other planning harm identified are balanced against the overall planning benefits of the proposal.

526. Post development, a measurable net gain in biodiversity and increased urban greening factor will be achieved, there will be a significant betterment in surface water run off rates across the site and the development will deliver new publicly accessible open space and enhanced public realm, which will be beneficial locally. Economic and employment benefits will result directly through the construction and occupation/operational phases, including indirect benefits that would be felt locally from the development. Employment, skills and training commitments are to be secured in the s106 agreement and would be a benefit locally to residents of Brent.

527. As a car free development this will help ensure the development is sustainable, and that it promotes non-car modes of active travel. Contributions to be secured towards bus infrastructure, the provision of step free access at Alperton Station and pedestrian infrastructure in the locality.

528. The energy strategy demonstrates that it exceeds the GLA guidance target of 35% regulated CO2 emissions reductions for the domestic portion of the scheme, this, combined with the carbon offset contribution will help to achieve net zero. This combined with the wider sustainability strategy measures, including the SuDS strategy and improved run off rates will be a benefit.

529. Following the above discussion, officers consider that taking the development plan as a whole, the proposal is considered to accord with the development plan, and having regard to all material planning considerations, should be approved subject to conditions and completion of a satisfactory Section 106 Agreement.

530. Overall, the social, economic and environmental public benefits identified that would result from the development are considered, on balance, to clearly outweigh the identified planning harm, including harm arising where there is a conflict with adopted policies.

DRAFT DECISION NOTICE

DRAFT NOTICE

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

DECISION NOTICE – APPROVAL

Application No: 24/0410

To: Ewan Grunwald
QUOD
21 Soho Square
London
W1D 3QP

I refer to your application dated **13/02/2024** proposing the following:

Comprehensive mixed-use redevelopment of the site including the demolition of the existing buildings and construction of seven new buildings comprising residential dwellings (Use Class C3), residential co-living homes (Use Class Sui Generis), commercial and community uses (Class E (excluding sub-use B), F2 and sui generis – creative industries), new public square and other public realm improvements, car parking, cycle parking, internal and external private and communal amenity space, play space, access and servicing arrangements, plant, substations, and other associated works incidental to the proposed development. (This application is accompanied by an Environmental Statement)

Further explanation (not forming part of the formal description of development set out above):

The proposed development includes the construction of seven new buildings to provide 464 residential dwellings (Use Class C3) and 421 co-living homes (Use Class sui generis), comprising heights of between 2, 8, 10, 20, 23 and 29 storeys (up to 123.66 AODm), as well as a single storey workspace building. The development proposes 237sqm (GIA) of commercial floorspace (Class E – excluding sub-use B), 505sqm (GIA) of community and flexible workspace floorspace (Class F2, Class E (excluding sub-use B) and Sui Generis – creative industries), and 124sqm of flexible workspace (Use Class E(g) and Sui Generis – creative industries).

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

at **Atlip Centre and 2 Atlip Road, Wembley, HA0 4LU**

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: 04/03/2025

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

SCHEDULE "B"

Application No: 24/0410

SUMMARY OF REASONS FOR APPROVAL

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

National Planning Policy Framework (2024)
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.

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

- Site Location Plan - 2264-HTL-SW-00-DR-A-00001 Rev P1
- Existing Site Plan - 2264-HTL-SW-00-DR-A-00002 Rev P1
- Site Location Plan - 2264-HTL-SW-00-DR-A-00003 Rev P1
- Site Plan - 2264-HTL-SW-00-DR-A-00004 Rev P1
- Existing Site Demolition Plan - 2264-HTL-SW-00-DR-A-00005 Rev P1
- Ground Floor Plan - 2264-HTL-SW-00-DR-A-00100 Rev P1
- Mezzanine Floor Plan - 2264-HTL-SW-M1-DR-A-00100 Rev P1
- First Floor Plan - 2264-HTL-SW-01-DR-A-00101 Rev P2
- Second Floor Plan - 2264-HTL-SW-02-DR-A-00102 Rev P2
- Third Floor Plan - 2264-HTL-SW-03-DR-A-00103 Rev P2
- Fourth Floor Plan - 2264-HTL-SW-04-DR-A-00104 Rev P2
- Fifth Floor Plan - 2264-HTL-SW-05-DR-A-00105 Rev P2
- Sixth Floor Plan - 2264-HTL-SW-06-DR-A-00106 Rev P2
- Seventh Floor Plan - 2264-HTL-SW-07-DR-A-00107 Rev P21
- Eighth Floor Plan - 2264-HTL-SW-08-DR-A-00108 Rev P2
- Ninth Floor Plan - 2264-HTL-SW-09-DR-A-00109 Rev P2
- Tenth Floor Plan - 2264-HTL-SW-10-DR-A-00110 Rev P2
- Eleventh Floor Plan - 2264-HTL-SW-11-DR-A-00111 Rev P2
- Twelfth Floor Plan - 2264-HTL-SW-12-DR-A-00112 Rev P2
- Thirteenth Floor Plan - 2264-HTL-SW-13-DR-A-00113 Rev P2
- Fourteenth Floor Plan - 2264-HTL-SW-14-DR-A-00114 Rev P2
- Fifteenth Floor Plan - 2264-HTL-SW-15-DR-A-00115 Rev P2
- Sixteenth Floor Plan - 2264-HTL-SW-16-DR-A-00116 Rev P2

- Seventeenth Floor Plan - 2264-HTL-SW-17-DR-A-00117 Rev P2
- Eighteenth Floor Plan - 2264-HTL-SW-17-DR-A-00118 Rev P2
- Nineteenth Floor Plan - 2264-HTL-SW-17-DR-A-00119 Rev P2
- Twentieth Floor Plan - 2264-HTL-SW-17-DR-A-00120 Rev P2
- Twenty First Floor Plan - 2264-HTL-SW-17-DR-A-00121 Rev P2
- Twenty Second Floor Plan - 2264-HTL-SW-17-DR-A-00122 Rev P2
- Twenty Third Floor Plan - 2264-HTL-SW-17-DR-A-00123 Rev P2
- Twenty Fourth Floor Plan - 2264-HTL-SW-17-DR-A-00124 Rev P2
- Twenty Fifth Floor Plan - 2264-HTL-SW-17-DR-A-00125 Rev P2
- Twenty Sixth Floor Plan - 2264-HTL-SW-17-DR-A-00126 Rev P2
- Twenty Seventh Floor Plan - 2264-HTL-SW-17-DR-A-00127 Rev P2
- Twenty Eighth Floor Plan - 2264-HTL-SW-17-DR-A-00128 Rev P2
- Top of Roof Plan - 2264-HTL-SW-17-DR-A-00129 Rev P2
- Building A - North Elevation - 2264-HTL-A-ZZ-DR-A-00210 Rev P1
- Building A - North Elevation - 2264-HTL-A-ZZ-DR-A-00210 Rev P1
- Building A - East Elevation - 2264-HTL-A-ZZ-DR-A-00211 Rev P1
- Building A - South Elevation - 2264-HTL-A-ZZ-DR-A-00212 Rev P1
- Building A - West Elevation - 2264-HTL-A-ZZ-DR-A-00213 Rev P1
- Building B2- North Elevation - 2264-HTL-B-ZZ-DR-A-00210 Rev P1
- Building B1 - North Elevation - 2264-HTL-B-ZZ-DR-A-00211 Rev P1
- Building B2 - East Elevation - 2264-HTL-B-ZZ-DR-A-00212 Rev P3
- Building B1 - East Elevation - 2264-HTL-B-ZZ-DR-A-00213 Rev P2
- Building B1 - South Elevation - 2264-HTL-B-ZZ-DR-A-00214 Rev P2
- Building B2 - South Elevation - 2264-HTL-B-ZZ-DR-A-00215 Rev P3
- Building B2 - West Elevation - 2264-HTL-B-ZZ-DR-A-00216 Rev P3
- Building B1 - West Elevation - 2264-HTL-B-ZZ-DR-A-00217 Rev P2
- Building C1 - North Elevation - 2264-HTL-C-ZZ-DR-A-00210 Rev P1
- Building C2 - North Elevation - 2264-HTL-C-ZZ-DR-A-00211 Rev P1
- Building C1 - East Elevation - 2264-HTL-C-ZZ-DR-A-00212 Rev P1
- Building C2 - East Elevation - 2264-HTL-C-ZZ-DR-A-00213 Rev P1
- Building C2 - South Elevation - 2264-HTL-C-ZZ-DR-A-00214 Rev P1
- Building C1 - South Elevation - 2264-HTL-C-ZZ-DR-A-00215 Rev P1
- Building C1 - West Elevation - 2264-HTL-C-ZZ-DR-A-00216 Rev P1
- Building C2 - West Elevation - 2264-HTL-C-ZZ-DR-A-00217 Rev P1
- Building D1 - All Elevations - 2264-HTL-D-ZZ-DR-A-00210 Rev P1
- Building D2 - All Elevations - 2264-HTL-D-ZZ-DR-A-00211 Rev P1
- Ground Landscape GA – 523-LP-GF-GA-011 Rev P02
- Ground Floor Landscape Level – 523-LP-GF-GA-012 Rev P02

- Ground Floor and Roof Landscape GA – 523-LP-GF-GA-020 Rev P02
- Ground Floor Hard Landscape – 535-LP-GF-GA-040 Rev P02
- Ground Floor Soft Landscape – 535-LP-GF-GA-050 Rev P02

Reason: For the avoidance of doubt and in the interests of proper planning.
2

3 The development hereby permitted shall contain 464 residential (C3) units as detailed in the drawings hereby approved.

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

4 The development hereby approved shall be built so that no fewer than 418 of the residential C3 homes achieve Building Regulations requirement M4(2) – 'accessible and adaptable dwellings' and that no fewer than 46 of the residential C3 homes achieve Building Regulations requirement M4(3) – 'wheelchair user dwellings' unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that the development achieves an inclusive design in accordance with London Plan Policy D7.

5 The development hereby permitted shall contain 421 co-living (sui generis) units as detailed in the drawings hereby approved.

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

6 The development hereby approved shall be built so that no fewer than 32 co-living units are designed to be wheelchair adaptable, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that the development achieves an inclusive design in accordance with London Plan Policy D7.

7 The scheme hereby approved shall contain no more than 506sqm (GIA) of community and workspace (Use Classes F2 (b), E (excluding sub-use B), and Sui Generis – Creative Industries), 237sqm (GIA) of flexible commercial (Use Class E – excluding sub-use B) floorspace, and 133sqm (GIA) of flexible commercial workspace (Use Classes E(g) and Sui Generis – Creative Industries) and shall not be used for any other purposes, notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 (as amended) (or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification) and the Town and Country Planning (General Permitted Development) Order 2015 (as amended) (or any order revoking and re-enacting that Order with or without modification).

Reason: To ensure an appropriate quantum of non-residential floorspace.

8 The approved cycle and refuse storage facilities as shown on drawings 2264-HTL-SW-00-DR-A-00100 Rev P1 and 2264-HTL-SW-01-DR-A-00101 Rev P2 shall be installed on a phased or building specific basis prior to occupation of the relevant phase or building that they serve, and thereafter retained and maintained for the life of the development, unless otherwise agreed in writing with the Local Planning Authority.

The specification of the cycle and refuse storage shall be delivered in accordance with the

submitted Transport Assessment and Operational Waste Management Plan prepared by Velocity (dated February 2024), unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure that the development is fit for purpose and to encourage sustainable forms of transportation.

9 The development hereby approved shall be designed so that mains water consumption does not exceed a target of 105 litres or fewer 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: To promote water conservation and efficiency measures in all new developments in accordance with Policy SI5 of the London Plan.

10 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). 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 EP3 and London Plan policies 5.3 and 7.14.

11 In the event that non-residential floorspace is occupied by a business / operator that requires odour control and / or extract ventilation systems, details of such equipment including all details of any external or internal ducting and measures to minimise noise and vibration impacts when in use shall be submitted to the Local Planning Authority for approval in writing prior to installation.

The approved equipment shall thereafter be operated at all times and maintained in accordance with the approved details and manufacturer's instructions.

Reason: in the interest of neighbour amenity and to ensure an acceptable appearance of the development is maintained in the interest of visual amenity.

12 Once occupied, no fewer than 50% of the area of non-residential glazing on the ground floor of the building facades shall be kept free from anything that would obscure views through the glazing, including but not limited to applied lettering and screens, posters, vinyl and screens set on or behind the glazing, unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure a satisfactory standard of development that maintains natural surveillance across the site and provides active frontages, in accordance with Local Plan policies DMP1 and BE7.

13 Equitable access for residents of the development shall be provided to designated communal amenity spaces to ensure the following:

- The external and internal communal amenity spaces within Building A shall be

made available and accessible to all residents of that building, for the lifetime of the development.

- The external communal terrace at ground level (area marked as '11' on plan number 523-LP-GF-GA-010 rev P02) and the ground floor internal communal amenity space within Buildings B1 and B2 shall be made available and accessible to all residents within these buildings, regardless of the type and affordability of their accommodation, for the lifetime of the development.
- The external roof terrace of building B2 shall be made available and accessible to all residents within that building, regardless of the type and affordability of their accommodation for the lifetime of the development.
- The external roof terrace of Building C1 shall be made available and accessible to all residents within this building, regardless of the type and affordability of their accommodation for the lifetime of the development.
- The external roof terrace of Building C2 shall be made available and accessible to all residents within this building, regardless of the type and affordability of their accommodation for the lifetime of the development.
- The external communal amenity spaces at ground level located to the east of Buildings C1 (areas marked as '4' on plan number 523-LP-GF-GA-010 revP02) shall be made available and accessible to residents within this building, regardless of the type and affordability of their accommodation. The same shall apply for the external communal amenity space at ground level (areas marked as '4' on plan number 523-LP-GF-GA-010 revP02) for Building C2.

Thereafter the communal amenity spaces shall be maintained in accordance with the above unless otherwise agreed in writing by the Local Planning Authority.

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

14 The recommendations set out in the submitted Flood Risk and Drainage Strategy, Issue 3 (prepared by Tullys, dated 20th June 2024) shall be fully implemented on the commencement of each phase of the development (excluding site preparation and demolition works), unless otherwise agreed in writing with the Local Planning Authority. Mitigation measures shall be retained and maintained thereafter throughout the lifetime of the development.

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

15 The recommendations set out at Table 12 of the submitted Air Quality Assessment (prepared by XCo2, dated February 2024) shall be fully implemented prior to occupation of each phase or building and retained thereafter, unless otherwise agreed in writing with the Local Planning Authority.

Reason: To protect local amenity and air quality in accordance with London Plan Policy SI1 and Local Plan Policies BSUI1 and BSUI2.

16 Prior to occupation of a phase or building within the development hereby approved, a communal television aerial and satellite dish system linking to all residential units within that phase or building, or a single system capable of being extended to serve the development as a whole, shall be provided and retained and maintained thereafter, unless otherwise agreed in writing with the Local Planning Authority.

No additional television aerial or satellite dishes shall be erected on the premises, unless otherwise agreed in writing with the Local Planning Authority.

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

17 The proposed development shall achieve compliance with Building Regulations Part O as set out in the submitted Overheating Risk Assessment (prepared by XCo2, dated August 2024) prior to occupation of each phase or building and retained and maintained thereafter, unless otherwise agreed in writing with the Local Planning Authority.

Reason: To minimise the potential for overheating to occur and ensure the comfort of future residential occupiers.

18 The recommended mitigation measures set out in the Noise and Vibration Report (prepared by prepared by XCo2, dated February 2024) shall be fully implemented prior to occupation of each phase or building and retained thereafter, unless otherwise agreed in writing with the Local Planning Authority.

Reason: To minimise the potential for harm/disturbance to future residential occupiers.

19 Prior to the commencement of works (excluding site preparation works) on a relevant part of the development hereby approved, a plan showing the extent of the CIL chargeable developments within each phase including estimated dates for the commencement and completion of those chargeable developments shall be submitted to the Local Planning Authority for its approval in writing through the submission of an application for approval of details reserved by condition.

This is a phased development for the purposes of the CIL Regulations (2010 as amended). The extent of the CIL phases will be defined on a CIL phasing plan.

Pre-demolition Reason: CIL payments must be made prior to commencement of development and the chargeable developments and associated charges must therefore be known prior to the commencement of works on those relevant phases.

20 The development hereby approved shall not be commenced (except for site preparation works) until a phasing plan showing the location of all phases, the sequencing for those phases, and indicative timescales for their delivery shall be submitted to and approved in writing by the Local Planning Authority through the submission of an application for approval of details reserved by condition. The development shall be carried out in accordance with the plan thereby approved.

The phasing plan may be updated from time to time subject to the written approval of the Local Planning Authority.

Reason: To allow the Local Planning Authority to understand the relevant phase of development that is subject to condition discharge and to ensure coordination between the phasing plan as approved and the triggers in any relevant agreement made under Section 106 of the Town and Country Planning Act 1990 (as amended).

21 Prior to the commencement of the development (excluding site preparation works) on a relevant part of the development hereby approved, a detailed Demolition Logistics Plan for the relevant part of the development shall be prepared in accordance with the Demolition Logistics Plan guidance produced by Transport for London and shall be submitted to and approved in writing by the Local Planning Authority through the submission of an application for approval of details reserved by condition.

The Demolition Logistics Plan(s) shall include:

a) hours of demolition;

b) hours of deliveries/material removal;

c) proposed vehicular routes;

d) parking of vehicles associated with demolition, site personnel, operatives and visitors inside the site;

e) facilities for the loading and unloading of plant and materials inside the site including details of holding/storage areas;

f) swept paths for manoeuvring and turning of large vehicles inside the site; to leave the site in a forward gear;

g) details of vehicular crossovers;

h) the siting of any site huts and other temporary structures, including site hoardings;

i) details of the proposed security arrangements for the site;

j) details of the precautions to guard against the deposit of mud and substances on the public highway;

k) details outlining the proposed range of dust control methods and noise mitigation measures during the course of construction of the development, having regard the Mayor of London's 'Control of Dust and Emissions During Construction and Demolition' Supplementary Planning Guidance (July 2014);

l) photographic survey of the pre-existing condition of the footway and carriageway around the site;

m) Details of banksmen arrangements to be in place for safe access and egress; and,

n) any other demolition element agreed as relevant by the Developer and the Council

The development shall thereafter be carried out in accordance with the approved Demolition Logistics Plan, unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure the demolition phase of works is carried out in an acceptable manner and in the interests of pedestrian and highway safety.

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

22 Prior to the commencement of works (excluding site preparation works) on a relevant part of the development hereby approved, the following information shall be prepared and submitted to and approved in writing by the local planning authority in consultation with TfL Infrastructure Protection:

a) provide an overview/construction methodology of the overall development including both design on temporary and permanent works;

b) provide a method statement and risk assessment with detailed drawings for the demolition works;

c) provide suitable mitigation in relation to balconies and openable windows for Blocks A, B1 and B2 in order to protect existing London Underground structures and assets. Any lifting works should not oversail TfL land unless otherwise agreed;

d) demonstrate that elevations of any building(s) within the development adjacent to London Underground assets can be accessed without recourse to entering TfL / London Underground land. Where this is not achievable, written agreement must be secured from TfL/London Underground in advance of any access being taken;

e) allow clear access for London Underground to safely carryout inspections/maintenance of their boundary/retaining wall or fence;

f) demonstrate that reasonable endeavours have been made in respect of the construction and future occupation of the development to not introduce additional security risks to the railway, property or structures;

g) submit a ground movement assessment to show the predicted impact on TfL assets as a result of the development in both short and long terms;

h) the development's design will need to mitigate the effects of noise and vibration arising from the adjoining TfL/ London Underground operations;

i) a revised noise and vibration survey and assessment that accounts for operational rail noise within the vicinity of the site shall be provided;

j) provide details on the use of tall plant/scaffolding for the demolition phase;

k) demonstrate that the design allows for any emissions from London Underground's tracks and vehicles on the access work next to the viaduct.

l) written confirmation will be required from Thames Water that any increased drainage or sewage from the site will not be discharged directly or indirectly into London Underground's drainage system.

The development shall be carried out in accordance with the approved details, unless otherwise agreed in writing with the Local Planning Authority and TfL Infrastructure Protection.

Reason: To ensure the safe operation of the adjacent railway lines and that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2021, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.

23 Prior to demolition of the existing electricity sub-station or prior to commencement of sub-structure works of Building B2, whichever comes first, a plan indicating the location, size and external appearance of a replacement electricity sub-station and timetable for its implementation will be submitted to and approved in writing by the Local Planning Authority in consultation with UKPN.

Thereafter, the agreed replacement sub-station location will be provided in accordance with the agreed timeframe and made available to UKPN, unless otherwise agreed in writing with the Local Planning Authority and UKPN.

Reason: To ensure sufficient utility service provision in the locality.

24 Prior to the commencement of any development (including site preparation works), a bat roosting survey shall be undertaken by a suitably qualified ecologist to assess the presence or likely absence of bats roosting within all existing buildings within the site.

The survey shall be conducted in accordance with current best practice guidelines and only undertaken from the period May to August inclusive and shall be submitted to and approved in writing by the Local Planning Authority.

If the survey confirms the presence of bats or identifies potential roosting features, a detailed mitigation and enhancement strategy shall be prepared and submitted for approval in writing by the Local Planning Authority. The strategy shall include, but not be limited to:

a) Measures to avoid disturbance or harm to bats and their roosting habitats.

b) Timetable for any necessary works, including appropriate seasonal constraints.

c) Proposals for compensatory habitat creation or enhancement.

d) Details of any necessary licensing requirements from Natural England.

All subsequent demolition works shall be carried out in strict accordance with the approved mitigation and enhancement strategy, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure compliance with the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017, and to safeguard biodiversity.

25 Prior to the commencement of a phase of development (excluding demolition and site preparation works), 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 the Local Planning Authority in writing for approval. The plant shall thereafter be installed and maintained in accordance with the approved details, unless otherwise agreed in writing by the Local Planning Authority.

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.

Reason: To ensure acceptable local noise levels.

26 Prior to the commencement of a phase of development (excluding demolition and site preparation works), an assessment of the noise levels associated with any adjacent substation shall be undertaken in accordance with BS4142:2014 'Methods for rating and assessing industrial and commercial sound'. Additionally, an assessment of low frequency noise associated with the substation shall be undertaken in accordance with the measurement procedure described within NANR45 'Procedure for the assessment of low frequency noise complaints'.

The assessment shall include any required mitigation measures to ensure that noise complaints associated with the substation, from residents in the approved development, are minimised.

The assessment shall be submitted to the Local Planning Authority for approval and thereafter any mitigation measures shall be implemented and maintained for the relevant phase, unless

otherwise agreed in writing with the Local Planning Authority.

Reason: In the interests of residential amenity.

27 Prior to the commencement of a phase of development (excluding demolition and site preparation works), a site investigation report for that phase shall be prepared by a competent person(s) to determine the nature and extent of any soil contamination and shall have been submitted to and approved in writing by the Local Planning Authority through the submission of an application for approval of details reserved by condition.

The investigation shall be carried out in accordance with the agreed principles, which should be informed by BS 10175:2011 + A2:2017 and the Environment Agency's current Land Contamination Risk Management Guidance.

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

28 Prior to commencement of a phase of development (excluding demolition and site preparation works), a remediation report in respect of that phase shall be submitted to and approved in writing by the Local Planning Authority through the submission of an application for approval of details reserved by condition.

The remediation report shall include the results of any site investigation and analysis undertaken as well as an assessment of the risks posed by any identified and unidentified contamination and the associated remediation options.

The report shall be submitted for the Local Planning Authority's approval through the submission of an application for approval of details reserved by condition.

A verification report shall be submitted to and approved in writing by the Local Planning Authority prior to first occupation of the relevant phase of the development showing that remediation has been carried out in accordance with the approved remediation scheme and shall demonstrate that the relevant part of the site is suitable for end use (unless the Planning Authority has previously confirmed that no remediation measures are required).

The report shall be submitted for the Local Planning Authority's approval through the submission of an application for approval of details reserved by condition.

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

29 Notwithstanding the details submitted, prior to the commencement of development (excluding demolition and site preparation works), a revised Construction Logistics Plan (CLP) prepared in accordance with Transport for London guidance shall be submitted to and approved in writing by the Local Planning Authority through the submission of an application for approval of details reserved by condition.

The relevant phase of the development shall thereafter be constructed fully in accordance with the approved CLP.

The CLP shall include the following information for all construction phases of the development:

a) Hours of construction;

b) Hours / timing of deliveries and collections (to avoid peak hours, school drop off/pick up times and to comply with local road restrictions);

c) Forecast number and type of construction related vehicle movements;

d) Parking of vehicles associated with deliveries, site personnel (including contractors), operatives and visitors;

e) Facilities for the loading, unloading and turning of delivery, service and construction vehicles delivering plant and materials;

f) Details of the storage facilities for any plant and materials;

g) The siting of any site huts and/or temporary buildings and other temporary structures, including site hoardings;

h) Details of the proposed security arrangements for the site;

i) Details of the precautions to guard against the deposit of mud and substances on the public highway, to include washing facilities by which vehicles will have their wheels, chassis and bodywork effectively cleaned and washed free of mud and similar substances prior to entering the highway and a scheme of road cleaning along construction routes;

j) Delivery routes for site construction traffic, at minimum from the nearest major road (A-road);

k) Commitment to the use of vehicle holding areas when a site is unable to accept further traffic;

l) Commitment to co-ordinate highway-affecting utility installations to minimise impact on the general public. All construction phases of the development shall be carried out strictly in accordance with the details so approved;

m) Demonstrate how safe access will be provided and the impact on street parking and access to Atlip Road minimised;

n) Pre-commencement photographic highway condition survey covering the site and near vicinity so that on completion of the development an assessment of any damage caused by construction activity from the development can be made and remedial works undertaken. All remedial works attributed to the site will be remedied at the developers cost. Failure to submit the condition survey could result in all highway defects adjacent to the site being attributed to the site activities;

o) Details of banksmen arrangements to be in place for safe access and egress; and,

p) any other construction logistics element agreed as relevant by the Developer and the Council.

All construction phases of the development shall be carried out strictly in accordance with the approved Construction Logistics Plan, unless otherwise agreed in writing with the Local Planning Authority.

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

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

30 Prior to the commencement of the relevant phase of the development hereby approved

(excluding site preparation works but not demolition) a detailed Construction Method Statement (CMS) for that phase shall be submitted to and agreed in writing by the Local Planning Authority outlining measures that will be taken in that phase to control dust, noise, vibration, air quality and other environmental impacts of the relevant phase of the development, whilst it is being constructed.

This shall include details of the appointment of a Construction Liaison Officer to take primary responsibility for day-to-day contact on construction / environmental related matters for the borough, other external bodies as well as the general public.

In addition, measures to control emissions during the demolition, site clearance, enabling works and construction phase(s) should be written into an Air Quality and Dust Management Plan (AQDMP), or form part of a separate Construction Environmental Management Plan (CEMP), in line with the requirements of the 'Control of Dust and Emissions during Construction and Demolition SPG'. The AQDMP (or CEMP) should also be submitted to and approved in writing by the Local Planning Authority.

The development within the relevant phase shall thereafter be constructed in accordance with the approved Construction Method Statement, and AQDMP (or CEMP), together with the measures and monitoring protocols implemented throughout the site enabling and construction phase(s), unless otherwise agreed in writing by the Local Planning Authority.

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

31 Prior to the commencement of development of the relevant phase/building of the development (excluding demolition and site preparation works), further details of wind mitigation measures for any residential balconies, communal amenity terraces and roof gardens or areas of public realm within that phase that would not otherwise be expected to achieve acceptable microclimate conditions, shall be submitted to and approved in writing by the Local Planning Authority through the submission of an application for approval of details reserved by condition.

The details submitted shall be in accordance with the findings and recommendations of the approved Pedestrian Level Wind Microclimate Assessment (prepared by RWDI, dated February 2024 - Ref: #2304842) and Statement of Conformity (prepared by RWDI, dated November 2024 – Ref: #2304842).

The mitigation measures shall be fully implemented prior to occupation of each phase or building in accordance with the approved details, and retained thereafter, unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure safety and comfort of future users and pedestrians

32 Prior to the commencement of development of the relevant phase/building of the development (excluding demolition and site preparation works), an updated Fire Safety Statement prepared by a suitably qualified person(s) shall be submitted to and approved in writing by the Local Planning Authority through the submission of an application for approval of details reserved by condition.

The fire safety measures outlined in the revised Statement shall be fully implemented prior to occupation of each phase or building.

Reason: To ensure that the highest standards in Fire Safety are achieved having regard to Policy D12 of the London Plan.

33 Prior to commencement of development of the relevant phase/building (excluding demolition and site preparation works), a BREEAM pre-assessment relating to the co-living (Sui Generis) floorspace/building shall be submitted to and approved in writing by the Local Planning Authority through the submission of an application for approval of details reserved by condition.

The BREEAM pre-assessment shall demonstrate how the relevant development component will achieve a rating of 'Excellent' or an alternative rating to be agreed in writing by the Local Planning Authority.

Reason: To ensure this is a sustainable form of development.

34 Prior to commencement of development of the relevant phase/building (excluding demolition and site preparation works), details of how the phase/building has been designed to allow future connection to a district heating network (should one become available), shall be submitted to and approved in writing by the Local Planning Authority through the submission of an application for approval of details reserved by condition.

The development shall be completed in accordance with the approved details prior to occupation of each phase or building and retained thereafter, unless otherwise agreed in writing by the Local Planning Authority.

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

35 Prior to commencement of development of a relevant phase (excluding demolition and site preparation works), a scheme of detailed public realm and landscaping proposals for that phase/building shall be submitted to and approved in writing by the Local Planning Authority (in consultation with Transport for London for any relevant phase that contains one or more of Buildings A, B1 or B2) through the submission of an application for approval of details reserved by condition.

The submitted scheme shall set out detailed proposals for the following aspects:

a) The treatment of all parts of the site not covered by buildings, including boundary features, podium and rooftop terraces and areas of defensible space at ground level:

b) Planting species and densities for all grass, shrubs and proposed trees, including provision of new street trees along Atlip Road;

c) Details of infrastructure to maximise rooting capacity and optimise rooting conditions including tree pit design and any underground modular systems:

d) An indication of how all trees and shrubs will integrate with the proposal in the long term with regard to their mature size and anticipated routine maintenance and protection including irrigation systems

e) Biodiversity mitigation and enhancement measures, as recommended in the

submitted Ecological Assessment and Biodiversity Net Gain Report (prepared by GS Ecology, dated February 2024) that shall deliver no less than 789% net-gain;

f) Hard landscaping materials for all ground surfaces (including samples which shall be permeable as appropriate), including dimensions, bonding and pointing;

g) Existing and proposed contours / levels;

h) Pedestrian routes;

i) Details of junctions with areas of public realm including drainage;

j) All boundary treatments and gates (including their means of opening) within and around the development;

k) Details of seating, ramps, play space (layout, manufacturers specification and phasing of delivery), roof top amenity areas, refuse disposal points, cycle parking infrastructure, bollards, signage and wayfinding, vehicle crossover and access points, and any other associated furniture / apparatus;

l) CCTV locations;

m) A maintenance/management plan and servicing details for all aspects of the hard and soft landscaping, communal amenity areas and areas of public realm;

n) Details of any mitigation measures necessary to achieve acceptable wind comfort levels across the development's landscaping in accordance with the submitted Pedestrian Level Wind Microclimate Assessment (prepared by RWDI, dated February 2024 – Ref: #2304842); and

o) External lighting strategy which shall include details of the lighting fixtures, luminance levels within and adjoining the site, as well as any ecological sensitivity measures that form a part of the lighting strategy, and a lux plan indicating any light spill. Details of future maintenance arrangements shall also be provided.

p) Cross-section/build-up details of green roofs (including how access for management will be created and maintained)

q) Details of how the community will be involved in the future maintenance of new landscaping and public realm (i.e. through planting days, seasonal activities) shall be submitted to the Council.

The approved landscaping scheme and external lighting strategy shall be completed prior to the first occupation of the relevant phase or building or in the case of planted elements, within the first planting season after the occupation of the relevant part of the development and thereafter retained and maintained unless alternative details are first agreed in writing by the Local Planning Authority.

The submitted landscape details shall demonstrate how an Urban Green Factor score of 0.4 shall be achieved.

During construction protection of existing trees (to be retained off site) shall be in accordance with the measures contained within the submitted Arboricultural Impact Assessment, ref:

536.22, dated October 2022, unless alternative details are first agreed in writing by the Local Planning Authority.

Any trees and shrubs planted in accordance with the landscaping scheme and any plants which have been identified for retention within the development which, within 5 years of planting, are removed, dying, seriously damaged or become diseased, shall be replaced to the satisfaction of the Local Planning Authority, by trees and shrubs of similar species and size to those originally planted.

Reason: In order to introduce high quality landscaping in and around the site in the interests of the ecological value and biodiversity of the site and to ensure a satisfactory landscaping of the site in the interests of visual amenity and to ensure appropriate provision for children's play on site having regard to Local Plan Policies DMP1, BGI1, BGI2 and BH13 and London Plan policy S4

36 Prior to commencement of development of the relevant phase/building (excluding demolition and site preparation works) an Obscure Glazing Window Strategy shall be submitted to and approved in writing by the Local Planning Authority to identify and confirm which windows within the development shall be obscurely glazed and/or high-level opening only. Thereafter the development shall be implemented fully in accordance with the approved Strategy and retained and maintained as such, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To minimise potential effects on nearby sites and in the interests of future residential amenity.

37 Prior to commencement of development of the relevant phase/building (excluding demolition and site preparation works) an Acoustic Glazing Strategy shall be submitted to and approved in writing by the Local Planning Authority. The Strategy shall confirm the recommended mitigation measures, as set out in the submitted Noise and Vibration Impact Assessment (prepared by XCO2, dated February 2024) and any others considered necessary will be implemented to minimise noise impacts.

The development shall be carried out in accordance with the approved Strategy, and retained and maintained as such, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure the comfort of future residential occupiers.

38 Prior to commencement of development of the relevant phase/building (excluding demolition and site preparation works) a scheme of sound insulation measures shall be submitted to the Local Planning Authority for approval in writing.

The insulation of the separating floor(s) between the commercial / non-residential use(s) and the residential accommodation above shall be designed to meet the standards of Building Regulations Approved Document E ‘Resistance to the passage of sound’. The approved measures shall thereafter be implemented in full, retained and maintained as such, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To obtain required sound insulation and prevent noise nuisance in the interest of the amenity of future residential occupants.

39 Prior to the commencement of the development of the relevant phase/building (excluding

demolition and site preparation works) details of the security measures to be incorporated into the development shall be submitted to and approved in writing by the Local Planning Authority that demonstrate that reasonable endeavours have been made to accommodate secure by design Silver Award principles in order to minimise the risk of crime and to meet the specific security needs of the development in accordance with the principles and objectives of Secured by Design.

The development shall be implemented in accordance with the approved security details prior to first occupation and maintained for the life of the development, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that the development maintains and enhances community safety in accordance with Policy DMP1 of the Local Plan.

40 Prior to the commencement of the development of the relevant phase/building (excluding demolition and site preparation works) a site wide surface water drainage strategy shall be submitted to and approved in writing by the Local Planning Authority;

The Strategy shall include:

a) Confirmation the SuDS hierarchy for discharging surface water drainage is to be followed and demonstrated with design plans, details and calculations;

b) Design calculations for the proposed SuDS features, for all relevant return periods (1 in 1 year, 1 in 30 year and 1 in 100 year + 40% climate change) demonstrating the critical duration used for design;

c) No surcharge is allowable for the 1 year return period and no flooding is allowable for the 30 year return period. Should any flooding occur for the 100 year + 40%cc return period, a plan drawing will need to be provided to demonstrate where the flooding occurs on site and the maximum depth of flooding and prove this is safe.

d) The undertaking of permeability tests to BRE 365 to determine the soakage potential for SuDS of the proposed development;

e) Should infiltration be found unfeasible for SuDS purposes, surface water from the site should be attenuated and discharged to Greenfield run-off rates.

f) A catchment plan should be provided.

g) Details of the future maintenance and management of all SuDS features to set out how and when to maintain the full drainage system (e.g. a maintenance schedule for each drainage / SUDS component), with details of who is responsible for carrying out the maintenance.

h) Information on overland flood flow paths and their maintenance should be demonstrated. An exceedance flow route plan for the entire site should be provided with levels to indicate that all surface water falls away from buildings and that exceedance flows are contained within the site boundary.

The development shall be carried out in accordance with the approved details, and the drainage strategy shall be retained maintained in accordance with these details for the lifetime of the development, unless otherwise agreed in writing by the Local Planning Authority.

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

41 Prior to the commencement of the development of the relevant phase/building (excluding demolition and site preparation works) detailed construction drawings shall be submitted to and approved in writing by the Local Planning Authority, in consultation with the Local Highway Authority, including all materials, road and footway make-up, planting, lighting, street furniture, drainage, lining and signing to Atlip Road, together with a timetable for implementation of these works and details confirming future maintenance.

The development shall be maintained in accordance with the completed Atlip Road highway works, unless otherwise agreed in writing by the Local Planning Authority in consultation with the Highway Authority.

Reason: To ensure an acceptable standard of development and in the interests of pedestrian and highway safety and sustainable drainage.

42 Prior to the commencement of the development of the relevant phase/building (excluding demolition and site preparation works), a Meanwhile Use Strategy prepared in accordance with the Council's adopted template and the Meanwhile Use Feasibility Study (prepared by KMDC, dated 23rd April 2024) shall be submitted to and approved in writing by the Local Planning Authority.

Once approved, the Strategy shall be implemented in full thereafter until the relevant unit(s) and/or space(s) are demolished, unless a revised Meanwhile Use Strategy is subsequently submitted to and approved in writing by the Local Planning Authority and thereafter implemented in full until permanent demolition.

Reason: to ensure that the development makes an appropriate contribution to the vitality and viability of the Alperton Growth area, in accordance with Local Plan Policy BE4.

43 No development shall take place (including demolition or site preparation works) until a Biodiversity Construction Environmental Management Plan (Biodiversity CEMP) has been submitted to and approved in writing by the local planning authority. The Biodiversity CEMP shall include details of measures to mitigate the impact of the demolition, construction and all associated works on noise, vibration and air quality on sensitive biodiversity receptors and must include the following:

a) Risk assessment of potentially damaging construction activities and details to demonstrate how construction traffic is to be routed away from noise sensitive biodiversity receptors (NSRs)

b) Identification of "biodiversity protection zones".

c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).

d) The location and timing of impactful works to avoid harm to biodiversity features.

e) The times during construction when specialist ecologists need to be present on site to oversee works.

f) Responsible persons (i.e. Construction Liaison Officer to take primary responsibility for day-to-day contact on environmental matters for the borough, other external bodies and the general public) and lines of communication.

g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly

competent person.

h) Use of protective fences, exclusion barriers and warning signs.

The approved CEMP shall be adhered to and implemented throughout the demolition and each phase of the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

Reason: To ensure that any harm to protected species and other wildlife is avoided or minimised during the construction process, and to assess residual ecological impacts of the development.

Reason for pre-commencement condition: Harm to wildlife on site could occur at any point during the construction process, and adequate controls need to be in place in order to control these.

44 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 through the submission of an application for approval of details reserved by condition.

All piling must be undertaken in accordance with the terms of the approved piling method statement, unless otherwise agreed in writing with the Local Planning Authority.

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

45 Before the sub-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority:

a) prior to commencement of each phase of the development, provide details (including method statements, risk assessment, design and category check, and any other documentation agreed as relevant between the TfL and the Applicant) of foundations basement and ground floor structures, or for any other structures below ground level including piling (temporary and permanent);

b) completion of a glare and glint study, including any recommended mitigation measures proposed.

The development shall be carried out in accordance with the approved details, including mitigation measures, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure the safe operation of the adjacent railway lines and that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2021, draft London Plan policy T3 and ‘Land for Industry and Transport’ Supplementary Planning Guidance 2012.

46 Prior to commencement of superstructure works for a relevant phase or building, a plan indicating the provision of electric vehicle charging points for the approved car parking spaces within that phase shall be submitted to and approved in writing by the Local Planning Authority through the submission of an application for approval of details reserved by condition.

Thereafter, the agreed electric vehicle charging points shall be provided, made available, retained and maintained for use prior to occupation of that phase of the development, unless otherwise agreed in writing with the Local Planning Authority.

The provision of electric vehicle charging points shall be in accordance with adopted London Plan standards, will provide both active and passive charging points.

Reason: To encourage the uptake of electric vehicles as part of the aims of London Plan policy T6.1.

47 Prior to commencement of superstructure works for a relevant phase or building, detailed plans shall be submitted to and approved in writing by the Local Planning Authority which demonstrate the provision of sufficient ducting space for full fibre connectivity infrastructure within the development.

The development shall be carried out in accordance with these plans thereafter and maintained as such in perpetuity.

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

48 Prior to commencement of superstructure works for a relevant phase or building, details of materials for all external work to the respective building(s), including samples / sample boards to be made available on site for inspection, and manufacturers specification / literature shall be submitted to and approved in writing by the Local Planning Authority.

Such details shall include:

a) Building envelope materials (including bricks, concrete, render, metalwork, repurposed shipping containers and cladding)

b) Windows, doors, fascias, glazing systems including colour samples;

c) Balconies, balustrades, louvres and screens; and,

d) Any other material samples agreed by the Developer and the Council.

The work shall be carried out in accordance with the approved details thereafter, unless otherwise agreed in writing by the Local Planning Authority.

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

49 Prior to commencement of superstructure works for a relevant phase or building, a photovoltaic (PV) strategy demonstrating how the PV provision has been fully maximised, shall be submitted to and approved in writing by the Local Planning Authority.

The approved PV provision shall be installed, retained and maintained thereafter in accordance with the approved Strategy for the lifetime of the development, unless otherwise agreed in writing by the Local Planning Authority.

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

50 Before the super-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and

approved in writing by the local planning authority:

a) provide details (including method statements, risk assessments, design and category check, and any other documentation agreed as relevant between the TfL and the Applicant) on the use of tall plant/scaffolding;

b) The proposed landscaping works designs shall be submitted to the Local Planning Authority in consultation with TfL Infrastructure Protection for their review and approval in relation to the risk of debris/rubbish build up that could ignite and/or vegetation growth which could provide a slipping hazard or promote other nuisances such as Pleurococcus growth or growth beyond the height of the viaduct that could impact upon the operational railway and TfL's ongoing maintenance strategy.

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, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.

51 otwithstanding the details submitted as part of the Delivery and Servicing Plan prepared by Velocity (dated February 2024), a revised Delivery and Servicing Plan prepared in accordance with Transport for London guidance shall be submitted to and agreed in writing by the Local Planning Authority prior to the occupation of each phase or building.

The revised Delivery and Servicing Plan shall be implemented in accordance with the approved details and retained thereafter, unless otherwise in writing agreed with the Local Planning Authority.

Reason: To ensure adequate delivery and servicing arrangements for the development, to avoid conflict with other road users in the interest of highway safety.

52 Notwithstanding the details submitted within the Car Park Management Plan prepared by Velocity (dated February 2024), a revised Car Park Management Plan shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of each phase or building.

The Car Park Management Plan shall be implemented in accordance with the approved details and retained thereafter, unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure appropriate use, allocation and effective management on vehicle parking spaces on site, having regard to the car-free nature of the scheme.

53 Notwithstanding the details submitted within the Operational Waste Management Plan prepared by Velocity (dated February 2024), a revised Refuse Management Plan shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of each phase or building.

The Refuse Management Plan shall include, but not be limited to, management of the refuse storage areas, responsibility for moving of bins to/from storage areas on collection days, disposal and collection arrangements for occupiers with accessibility issues, refuse store

access arrangements, numbers of collections and management company appointed.

The development shall thereafter operate in accordance with the approved Refuse Management Plan, unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure the effective storage and management of waste on site and in the interests of visual and residential amenity.

54 Prior to the occupation of a phase or building within the development hereby approved, details of a building maintenance strategy and implementation plan including cleaning (including window cleaning equipment) shall be submitted to and approved in writing by the Local Planning Authority. Once approved, the details as specified shall be adopted and the relevant buildings cleaned and maintained for the lifetime of the development in accordance with the approved details, unless otherwise agreed in writing with the Local Planning Authority.

Reason: In the interests of the visual amenity of the development.

55 Prior to occupation of the development hereby approved, a Signage Strategy for all buildings shall be submitted to and approved in writing by the Local Planning Authority. The Strategy shall include details of where any building signage / advertisements would be applied notwithstanding that the signage / advertisements themselves may require separate advertisement consent.

Thereafter any subsequent application(s) submitted for advertisement consent shall be in general conformity with the approved Signage Strategy, unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of visual amenity.

56 Prior to occupation of the development hereby approved, a scheme for wildlife and nesting features shall be submitted to and approved in writing by the Local Planning Authority that will include at least one of each of the following features within the development's red line boundary:

a) Multi-chamber swift bricks (preferred) or boxes,
b) House sparrow terraces,
c) Bat bricks (preferred) or boxes
d) Hedgehog holes in fences newly installed within the development site

The scheme will include full details (type of feature, location, plan and elevation views, height above ground (if applicable) and nearest external lighting (if likely to have an impact).

Features shall be undertaken in accordance with the approved scheme and thereafter retained in perpetuity.

Reason: To enhance the biodiversity value of the land in accordance Policy BGI of the Brent Local Plan.

57 Prior to the occupation of a phase or building within the development hereby approved, a Statement of Conformity shall be submitted to and approved in writing by the Local Planning Authority.

The Statement of Conformity will include evidence for photographs of each habitat/ecological feature installed as per the approved plans. This condition is to certify that the details for each

habitat / green infrastructure/ feature, as approved under Condition 34, are in accordance with the submitted information.

Reason: To enhance the biodiversity value of the land in accordance with Policy BGI of the Brent Local Plan.

58 Within three months of Practical Completion of a phase or building, the post-construction tab of the GLA's whole life carbon assessment template should be completed accurately and in its entirety in line with the GLA's Whole Life Carbon Assessment Guidance. This should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance.

The post-construction assessment should provide an update of the information submitted at planning submission stage, including the whole life carbon emission figures for all life-cycle modules based on the actual materials, products and systems used.

Confirmation of submission to the GLA shall be submitted to and approved in writing by the Local Planning Authority within three months of final occupation.

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

59 Within three months of Practical Completion of a phase or building, a Post Completion Report setting out the predicted and actual performance against all numerical targets in the relevant Circular Economy Statement shall be submitted to the GLA at: circulareconomystatements@london.gov.uk, along with any supporting evidence as per the GLA's Circular Economy Statement Guidance.

The Post Completion Report shall provide updated versions of Tables 1 and 2 of the Circular Economy Statement, the Recycling and Waste Reporting form and Bill of Materials.

Confirmation of submission to the GLA shall be submitted to, and approved in writing by the Local Planning Authority within three months of final occupation.

Reason: In the interests of sustainable development and to maximise material re-use on site.

60 Within 6 months of occupation of the co-living (Sui Generis) floorspace (building A), a Post Construction Stage Review BRE Certificate shall be submitted to and approved in writing by the Local Planning Authority through the submission of an application for approval of details reserved by condition. The certificate shall demonstrate that the relevant floorspace has achieved BREEAM "Excellent". Development shall be maintained so that it continues to comply for the lifetime of the development.

Reason: In the interests of sustainable development.

INFORMATIVES

1 - (PWAL) 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

2 - (F16) The applicant must ensure, before work commences, that the treatment/finishing of flank walls can

be implemented as this may involve the use of adjoining land and should also ensure that all development, including foundations and roof/guttering treatment is carried out entirely within the application property.

3 - In respect of conditions **X** the applicant is advised to contact London Underground Infrastructure Protection in advance of preparation of details pursuant to these conditions, including details of final design and associated method statements, in particular with regard to demolition; drainage; excavation; construction methods; tall plant: scaffolding: security; boundary treatment; safety barriers; landscaping and lighting.

4 - 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.

5 - Prior consent may be required under the Town and Country Planning (Control of Advertisements) Regulations 1990 for the erection of any
(a) illuminated fascia signs
(b) projecting box signs
(c) advertising signs
(d) hoardings

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(s) are strongly encouraged to pay the London Living Wage to all employees associated with the construction and end use of development.

7 - The following highways licences may be required: crane licence, hoarding licence, on-street parking suspensions. The applicant must check and follow the processes and apply to the Highway Authority.

8 - The Council recommends that the maximum standards for fire safety are achieved within the development.

9 - There are public sewers crossing or close to your development. If you're planning significant work near Thames Water sewers, it's important that you minimise the risk of damage. You will need to check that your development doesn't limit repair or maintenance activities, or inhibit the services Thames Water provide in any other way. The applicant is advised to read the following guide working near or diverting Thames Water pipes.
https://urldefense.com/v3/__https://www.thameswater.co.uk/developers/larger-scaledevelopments/planning-your-development/working-near-our-pipes__;!!CVb4j_0G!T6NC5eyXTZ5yLsj4ltd7w-AcYfFUMflCqbzki4-huYcdoIZHm3cLPtZwbOILcKdliWrJhapQ9p0uYvC8oxJ3aQOnI84IbLU$

10 - The following definitions apply in respect of the planning conditions above:

Site preparation works

Site preparation works comprise: surveys, site clearance, the erection of fencing or hoardings, the provision of security measures or lighting, the erection of temporary buildings or structures associated with the development, the laying removal or diversion of services, the provision of construction compounds.

Superstructure

Superstructure works are defined as part of the building above ground level slab. These excludes demolition, site preparation and all other below ground and foundation works.

CIL

For the purposes of the Community Infrastructure Levy Regulations 2010 (as amended) this is a phased development. Each CIL chargeable development approved by condition shall be considered a separate chargeable development for the purposes of calculating Community Infrastructure Levy.

Phase

A phase of development comprises a phase defined for the purposes of CIL and/or a phase defined for the purposes of the discharge of planning conditions and/or a construction phase or sub-phase, and for the purposes of discharging relevant planning obligations.

A phase can comprise site preparation works, demolition works, sub-structures, and/or buildings, plots or groups of plots.

Any person wishing to inspect the above papers should contact Gary Murphy, Planning and Regeneration, Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ, Tel. No. 020 8937 3314