

PRE-APPLICATION REPORT TO COMMITTEE

Planning Committee on 15 March 2017
Case Number 16/0445/PRE

SITE INFORMATION

RECEIVED: 2016

WARD: Dudden Hill

LOCATION: 370 High Road & 54-68 Dudden Hill Lane, London, NW10

SCHEME: The proposal is for a mixed use development consisting of 224 residential units, a supermarket, nursery, gym, café, workshops and amenity space.

APPLICANT: R55 Group

CONTACT: Colliers International

OFFICER: Barry Henn (South Team)

**LINK TO DOCUMENTS
ASSOCIATED TO
THIS APPLICATION** No plans as this is a pre-application item. Members will view a presentation at Committee.

SITE MAP
This map is indicative only



BACKGROUND

1. This proposed development is being presented to enable Members of the committee to view it before a planning application is submitted and to comment upon it. The development does not constitute an application for planning permission and any comments made upon it are provisional and subject to full consideration of any subsequent application and the comments received as a result of consultation, publicity and notification.
2. This is the first time that the proposed development has been presented to Members. To date, in accordance with the Planning Performance Agreement, there has been an initiation meeting between officers and the applicant, a site visit and two further meetings titled 'Place Making & Employment' and 'Retail and Transport'. The applicant has also sought pre-application advice from the Greater London Authority (GLA); the latter due to the fact the proposed development is referable to the GLA under the provisions of the Mayor of London Order 2008 for development which includes the provision of more than 150 units.

PROPOSAL and LOCATION

Proposal

3. The proposal in its current form seeks to create a mixed use development comprising 224 residential units and amenity space, affordable workspace, café, nursery, florist, supermarket and gym. The workspace and retail elements of the proposal would be located at ground floor level with the residential units located on the upper floors. Vehicular access to the site would be from the eastern side via Dudden Hill Lane. Pedestrian access would also be from this side of the site and on the western side to create a desire line through the site and improve connectivity. The proposal would have three main buildings above ground floor level with heights of nine, seven and five storeys. The residential units would have access to communal space at first floor level between the taller buildings.

Site and Surroundings

4. The site has an area of 0.93 hectares and is bounded by the Sapcote Trading Centre to the north; Colin Road to the south; Dudden Hill Lane to the east; and High Road to the west. The site is currently occupied by a number of industrial units including a heavy plant hire business, storage facilities for haulage equipment and scaffolding and a MOT station/Used car sales garage. There are three retail units located on the southern side of the site adjacent to the Colin Road/High Road junction. There is also a tyre garage located on Colin Road that does not form part of the site proposal.
5. The surrounding area comprises industrial units to the north, an undesignated shopping parade to the east and south and residential properties to the east, west and south. The site is also located within a Locally Significant Industrial Site (LSIS). Residential units in the form of two storey terraced properties are located on the southern boundary of the site on Colin Road. Residential properties are also found along Dudden Hill Lane and High Road. The height of the buildings in the area is generally two/three storeys however there are a number of examples of taller buildings located to the west on the approach to Church End and to the north-east on Dudden Hill Lane. The site is not located within a conservation area and does not contain any listed buildings.
6. The site has a Public Transport Accessibility Level (PTAL) of 5 with Dollis Hill underground station located approximately 160 metres to the north-east and regular bus services to Church End, Neasden and Willesden.

Planning History

7. No significant planning history attached to the site.

CONSULTATION

8. At this stage it is intended that the following will be consulted regarding any subsequent planning application:

Consultee:-

(Internal)

- Ward Councillors (Brent)
- Transportation (Brent)
- Environmental Health (Brent)
- Landscape Design (Brent)
- Tree Protection Officer (Brent)
- Sustainability Officer (Brent)
- Housing (Brent)
- Urban Design Officer (Brent)
- Planning Policy (Brent)
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(External)

- Greater London Authority
- Transport for London (TfL)
- Secure by Design Officer (Met Police)
- All existing properties and addresses within 300m of the application site.

Community Engagement

9. The proposal is in the early stages of pre-application discussions however the applicant has begun the community engagement process. This has included a series of design and development workshops that have been held over the past 12 months. The key community leads/groups that have been met with are the Willesden Town Team, the Willesden New Testament Church of God and Citizens UK. Early concerns raised by the attendees focused on the impact on parking and construction traffic.

POLICY CONTEXT

10. The National Planning Policy Framework (NPPF) 2012. At the heart of the NPPF is a presumption in favour of sustainable development. Building a strong, competitive economy is of the core principles of the NPPF and paragraph's 21 and 22 are of relevance.
11. London Plan consolidated with alterations since 2011 (March 2016)
12. Mayor's Housing SPG
13. Development Management Policies, London Borough of Brent (2016) – adopted 21 November 2016
14. London Borough of Brent LDF Core Strategy 2010
15. Supplementary Planning Guidance 17 'Design Guide for New Development' (2002)

MATERIAL PLANNING CONSIDERATIONS

Issue 1

Locally Significant Industrial Site

16. The site is located within a Locally Significant Industrial Site (LSIS). Core Strategy (2010) Policy CP20, Development Management Policy DMP 14 and London Plan Policy 2.17 are of particular relevance.

17. Policy CP20 seeks to protect LSISs designated for industrial employment uses characterised by use classes B1, B2 and B8, or Sui Generic uses that are closely related. Policy DMP14 states that LSIS will only be released where it is a low quality employment site and would deliver specified wider benefits. The site is not identified in the Employment Land Demand Study as being of low quality and suitable for release. As such, the proposals are contrary to the Development Plan and such a proposal would be a departure from policy DMP14.

Issue 2

A1 Retail use in out of town centre location

18. The proposed A1 retail use is considered a main town centre use. The site is located outside of the designated town centres of Church End and Willesden which are located approximately 400 and 600 metres away respectively. Therefore the case will have to be made for this being a suitable site which sustains Brent's town centres in line with the NPPF and demonstrates compliance with the Development Plan and specifically the London Plan policy 2.15, Brent's Core Strategy policy CP 16 and Development Management Plan policy DMP2. The proposal would require a robust Retail Impact Assessment and the appliance of the Sequential Approach to Development.

Issue 3

Affordable Housing

19. London Plan policy 3.12 requires borough's to seek the maximum reasonable amount of affordable housing, taking account of a range of factors including local and regional requirements, the need to encourage rather than restrain development and viability. The policy requires borough's to take account of economic viability when negotiating on affordable housing.
20. Normally applicants' are required to demonstrate that the maximum reasonable amount of affordable housing is being provided in this scheme, and this would need to be tested through the submission of a financial appraisal submitted with any future planning application. In this case the applicant is proposing 65% of the units to be affordable in compliance with Brent's policy.

Issue 4

Scale, massing, height and impact on daylight and sunlight

21. London Plan policy 3.5 promotes quality in the design of housing developments. Policy 7.6 on 'Architecture' states that buildings should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is regarded as being particularly important for tall buildings.
22. Policy 7.7 on tall buildings says that these should not have an unacceptably harmful impact on their surroundings, be located in areas of intensification and with good access to public transport, only be considered in areas whose character would not be adversely affected, relate well to existing urban grain and public realm, incorporate the highest standards of architecture and materials, have ground floor activities that relate positively to surrounding streets and make a significant contribution to local regeneration.
23. The proposal comprises a ground floor level principally occupied by workspace, retail and parking. Above are three angled residential blocks ranging in height from nine 5-9 storeys. The nine storey element is proposed on the High Road/Colin Road. Other than this element, the height parts of the development are located more centrally in the development.
24. In urban design and place making terms it is considered appropriate that the tallest elements of the scheme are located fronting onto the High Road/Colin Road part of the site. This responds to the existing urban grain and the fact that the main arterial route and pedestrian

access would be found in this part of the site. The buildings would then step down in height across to the opposite side of the site in response to the lower scale of predominantly 2/3 storey built form found along Dudden Hill Lane. The GLA have stated that although the development would be a change in scale to the existing terraced residential streets, it would not be considered a substantive change and is appropriate for an inner urban location.

25. In order to justify the height and scale proposed the applicant will need to demonstrate the highest quality of architecture, and that the scale proposed will not unacceptably impact on the surrounding environment and residential amenity. To this end daylight and sunlight conditions will need to be tested for existing surrounding buildings and a sample of proposed residential units. The findings of this will need to be presented and fully considered with any future planning application within a formal assessment and report for further consideration.
26. A detailed townscape and views assessment will also need to be submitted with any application to consider the impact of a proposal of this scale on the existing built environment. This will need to include long views of the site from the different approach roads.
27. The applicant will be required to demonstrate the scheme's level of compliance with the 30 and 45 degree tests, as set out in Supplementary Planning Guidance 17 'Design Guide for New Development'. These tests seek to ensure the scale of new development is appropriate to its context, and that it does not unacceptably harm the amenity of surrounding occupiers. The applicant is also required to demonstrate in their planning application compliance with SPG17 separation distances, and where a 20m separation between directly facing windows is not achieved provide sufficient justification for this, or demonstrate that through careful design considerations this can be mitigated against.

Issue 5

Public Realm

28. An area of public space is proposed between the workspace and retail elements on the western side of the site. This is welcomed in principle and provides the opportunity for public realm benefits and improvements to the site and wider area. However at this stage there are concerns that the same level of detail and place making has not been afforded to the car park area. There is a desire to create a link between Dollis Hill underground station and Church End.

Issue 6

Transportation

29. It is proposed that car parking will be provided for the supermarket with limited parking for the residential use (accessible parking only). The parking and servicing is being reviewed including surveys being undertaken by the applicant.

Planning Obligations

30. In accordance with the Councils Planning Obligations SPD, the proposal would be likely to attract the following obligations to mitigate the impact of the development:
 - Affordable Housing.
 - Employment and training opportunities during construction and operation phases
 - Car-Parking Permit Free development to remove the rights of residents to apply for parking permits in the surrounding roads in the vicinity of the site,
 - Energy - Achieve a 35% reduction in CO2 emissions beyond the 2013 Building Regulations and to provide a carbon off-set contribution of (amount to be agreed) to be used towards on / or off-site improvements related to carbon reduction to off-set any shortfall below the target 35%.
 - Submission and approval of a commercial and residential Travel Plan to score a PASS rating under TfL's ATTruTE programme prior to first occupation fully implement the

approved plan for the lifetime of the development thereafter. Submission of a Delivery & Servicing Plan for the workspace and retail elements

- Undertaking of on and off site highway works through an agreement under S38/S278 of the Highways Act 1980

Community Infrastructure Levy (CIL)

31. The proposed development would be CIL liable development. The amount of liability this would attract will be confirmed at a later stage when the precise quantum of development is known.

Conclusion

32. Members should note that the above development is still in the pre-application stage and that additional work remains to be carried out.