

## **PRE-APPLICATION REPORT TO COMMITTEE**

**Planning Committee on**            **15 March 2017**  
**Case Number**                    **16/1537/PRE**

### **SITE INFORMATION**

RECEIVED:                            2016

WARD:                                 Wembley Central

LOCATION:                             500 High Road, Wembley, HA9 7BH

SCHEME:                    Proposed demolition of existing building and proposed erection of a part 9 and part 11 storey mixed use building containing 360sqm of commercial floorspace (use class A2) on the ground floor and comprising 74 residential units (9x studio, 20x 1 bed, 27x 2 bed and 18x 3 bed) on the upper floors

APPLICANT:    Brimelow McSweeney Architects

CONTACT:        Mr Stephen Donnelly

OFFICER:        Toby Huntingford (North Team)

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

**SITE MAP**  
This map is indicative only



## BACKGROUND

1. This pre-application submission for a new mixed use development is being presented to enable Members of the committee to view it before any subsequent applications are 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 revised application and the comments received as a result of consultation, publicity and notification.
2. This is the first time the proposals shown within this submission have been presented to Members.

## PROPOSAL and LOCATION

### Proposal

3. The proposal is for the demolition and rebuilding of the building to the rear of 500 High Road which currently houses a commercial unit (Jobcentre).
4. The proposal incorporates:
  - 74 new flats situated within a part 10 and part 12-storey building located to the rear of 500 High Road, on the corner of Elm Road and St John's Road;
  - 360sqm of commercial floorspace will be provided (Use Class A2 – Jobcentre) at ground floor;
  - Retention of retail store fronting Wembley High Road (Boots).

### Proposed residential mix

5. The following residential mix is proposed:

#### **Private Market Housing (68% of total):**

9x studio  
12x 1 bed  
19x 2 bed  
10x 3 bed

#### **Affordable Housing (32% of total):**

8x 1 bed (5x Affordable Rent and 3x Shared Ownership)  
8x 2 bed (5x Affordable Rent and 3x Shared Ownership)  
8x 3 bed (6x Affordable Rent and 2x Shared Ownership)

Overall Tenure Split on Affordable Housing = 67:33 (Affordable Rent: Shared Ownership)

### Car parking and cycle storage

6. With the exception of five disabled spaces and one car club space along the service access part of Elm Road fronting the development, no additional car parking is proposed. A cycle storage room and bin storage room (which can be accessed from the street) are proposed to be contained within the ground floor of each of the two residential cores.

## Site and Surroundings

7. The site contains a two storey red brick building containing a Jobcentre retail unit. The building is located on the corner of St John's Road and Elm Road just inside the boundaries of Wembley Town Centre. The site also includes a retail unit (Boots) that fronts Wembley High Road on the south side of the site; however this part of the site is not part of the proposed redevelopment.

8. To the south of the site is Wembley High Road and the Wembley Central development on the opposite side of the High Road. To the north of the site fronting Elm Road is a terrace of houses (some converted to flats) and a Hotel (Elm Road Hotel) within the first 5 buildings of the terrace. To the east of the site is a 5 storey residential development (approved in 2008 – Ref: 07/3058) that immediately borders the site without a break in the frontage. To the west of the site on the opposite side of St John's Road is a parade of secondary shopping frontage within Wembley Town Centre. There is not significant footfall and a more residential character prevails.
9. The site is not within a conservation area, however is within the Wembley Town Centre boundary and is subject to the policies within the Wembley Area Action Plan.

### **Planning History**

10. There is no relevant planning history for this property

### **CONSULTATION**

11. In accordance with the National Planning Policy Framework and Brent's Statement of Community Involvement the developer is required to engage with the local community whilst developing their proposals for the site. No details on such consultation have yet been provided, however this will be expected as part of a full application.
12. The proposals to date have been subject to internal consultation with the Council's Planning Policy department, Transport officer, Regulatory Services and Urban Design officer.
13. The following will be consulted regarding any subsequent planning application:

#### **Consultee:-**

##### **(Internal)**

- Ward Councillors for Wembley Central (Brent)
- Transportation (Brent)
- Environmental Health (Brent)
- Landscape Design (Brent)
- Heritage & Conservation officer (Brent)
- Tree Officer (Brent)
- Housing (Brent)
- Urban Design Officer (Brent)
- Flood/drainage engineer (Brent)

##### **(External)**

- Secure by Design Officer (Met Police)
- Thames Water
- Greater London Authority (GLA)
- Transport for London (TfL)
  
- All existing properties and addresses within 100m of the application site.

*(N.B. This is not a final list and is subject to further review/change should any formal planning application be submitted)*

### **POLICY CONTEXT**

14. 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.

15. London Plan consolidated with alterations since 2011 (March 2016)
16. Mayor's Housing SPG
17. Development Management Policies, London Borough of Brent (2016) – adopted 21 November 2016
18. London Borough of Brent LDF Core Strategy 2010
19. Supplementary Planning Guidance 17 'Design Guide for New Development' (2002)
20. Wembley Area Action Plan (2015)

## **MATERIAL PLANNING CONSIDERATIONS**

21. The main issues relevant to this proposal that the Committee should be aware of at this stage are:
  - Principle of development
  - Scale, height, massing and design of the development within its local context
  - Design and layout
  - Quality of residential accommodation
  - Affordable housing provision
  - Impact on amenities of neighbouring properties
  - Transport
  - Environmental health

### **Issue 1**

#### **Principle of development**

22. Although covered by the Wembley Area Action Plan (WAAP), the site is not specifically allocated for development. It is within the boundary of a town centre but not within either the primary or secondary frontage (other than the retail unit to the front which is not proposed to be redeveloped). In addition, the site is identified as being sensitive to tall buildings in the WAAP.
23. The principle of residential above commercial/town centre use in this location (within the boundary of a town centre) is consistent with Brent Local Plan policy as well as national policy. The location has a high PTAL score (6a), so there is logic in increasing development density in an area that also has good accessibility to facilities and employment. The ground floor is not within either a primary or secondary frontage, but the proposed commercial use helps animate the ground floor and gives what is a side street within the town centre some interest, as is currently the case.

### **Issue 2**

#### **Scale, height, massing and design of the development within its local context**

24. The site is located in an area defined as being 'Sensitive to Tall Buildings' in the WAAP. Policy WEM5 does preclude tall buildings in this location but requires the highest architectural quality and key views assessment to support the proposal. The site is near Central Square and from the south have this as a backdrop. Views from surrounding areas will have an increasing number of taller buildings either in the foreground or the background though it is noted that the existing context to the north is lower rise development.
25. National policy and the Mayor's initial comments on the London Plan review identify public transport nodes as preferred areas in which to maximise additional development opportunities. In moving forward with the Local Plan, the area is likely

to be prioritised for such opportunities and could be subject to substantially more change than identified in the WAAP in the future.

26. In seeking to justify the height, the applicant points to local precedents including King Edward Court (03/3727) which forms a similar bookend at the opposite end of Elm Road. The difference with this site is that it fronts a principal movement corridor in the area and the application site does not. It is recognised that the corner location of the site does help support a taller building but it is considered that the height as proposed is too high. The development is not considered to not reflect lower order role of St John's Road and existing 2 storey housing in the immediate locality. It also noted that there has been no character and context analysis performed in line with the GLA's SPD and London Plan Policy.
27. In terms of the design and architecture, the visualisations show little articulation and does not demonstrate the highest architectural quality as required by policy WEM5. It is noted that the proposed location will not impede protected views of the stadium, as demonstrated within the pre-application submission materials.

### **Issue 3**

#### **Design and layout**

28. At present, the extent of inactive frontage at ground floor level is undesirable. It is understood that there have been instances of antisocial behaviour and fly tipping in this area. It is considered that a proposal which creates more activity and incorporates windows to provide natural surveillance may help address these existing problems.
29. The proposed design reduces the frontage given to the A2 use but the overall design will see more activation of the frontage, with two separate entrances to the development:
  - St John's Road entrance providing access to the core serving the affordable units; and
  - Elm Road entrance providing access to the core serving the private market units.

The general layout of the immediate core entrance is similar for both, with access to two lifts, the stairs, plant rooms, bikes and bin stores being the immediate ground floor facilities. The lobby for the private market unit entrance is larger which is considered acceptable given that this core provides access to a significantly greater number of units. However, it is noted that the affordable entrance is provided from the street through a single door whilst the market entrance is provided from the street through a set of double doors. It is important that the entrances are equivalent in terms of their prominence from the street and the design should be revised to reflect this. In addition, the layout of the lobby to the affordable block is not very usable and should be reviewed.

30. The design will necessitate removing the existing servicing access to the Boots shop on the High Road. This is proposed to be re-provided within this development, with a new service access being provided along the Elm Road frontage.
31. The arrangement of the frontage along Elm Road and St John's Road will be altered considerably, with access to two separate bin stores (one for each core) for refuse collection, bike stores, Boots goods access, the two core entrances and the main retail unit access all immediately fronting Elm and St John's Roads. The plans indicate that all of these accesses will be glazed to activate the frontage, although the levels of activity that would be present within each part of the frontage are likely to vary. Careful consideration will need to be given to the design at ground floor to ensure the street environment is acceptable.

32. Five disabled parking bays and a car club bay are to be provided along the service road portion of Elm Road, which immediately fronts the north side of the development.
33. The private market core provides access to eleven upper floors of flats, with each floor containing four flats in a varied mix. The eleventh floor solely contains a 3 bedroom 'penthouse' style flat with a large terrace surrounding it. The affordable core provides access to nine upper floors of flats, containing between two and three flats per floor in a varied mix. The ninth floor solely contains a 3 bedroom 'penthouse' style flat with a larger terrace surrounding it.

#### **Issue 4**

##### **Quality of residential accommodation**

34. All residential units will need to be compliant with London Plan space standards, and the Part M2 criteria in relation to accessible and adaptable housing, expressed in the nationally prescribed optional housing standards.
35. Most flats have a balcony providing outlook to the east, west or south. The penthouse flats have large terraces. Further communal amenity space is provided in the form of an elevated garden across the first and second floors (approx. 420sqm). The garden includes a sizeable children's play area to accord with the Mayor's Play and Informal Recreation SPG 2012. All flats without a balcony have a small part of the garden apportioned for their use meaning that all flats have some provision of private outdoor amenity space. The garden will be enclosed within the development and is surrounded by approximately 10 additional floors of the building on the north and west sides. The building is also enclosed by the rear of the retail units along the High Road on the south side. The flats with south and east facing balconies overlook this garden space. The overall quantum of amenity space equates to approx. 1300sqm, which is significantly below the required amount of 2020sqm in accordance with SPG17 standards. It is also noted that the communal gardens will have a fairly enclosed character by virtue of the scale and immediacy of surrounding buildings.
36. Whilst weight is given to the town centre location and proximity to transport links, it is considered that the shortfall in overall amenity space provision is significant. There is no public green space present in a close proximity. Consideration will need to be given to ways to help offset this shortfall which may include increasing the internal standard of living of flats by ensuring they notably exceed the London Plan minimum standards.
37. Most residential units will benefit from a good level of outlook, with the number of dual aspect units maximised and the few single aspect units that are present being no larger than one bedroom flats and providing east or west facing outlook which is considered acceptable. Some of the studio flats have a problematic outlook and this will be looked to be addressed as part of a full application.
38. Policy CP21 of Brent's Core Strategy 2010 seeks for 25% of units to be family sized (three bedrooms or more). The proposal achieves 24% family sized units, so is broadly policy compliant.

#### **Issue 5**

##### **Affordable housing provision**

39. London Plan policy 3.12 requires boroughs to seek the maximum reasonable amount of affordable housing, taking account of a range of factors including local and regional requirements, the need to encourage rather than restrain development and viability. The policy requires boroughs to take account of economic viability when negotiating on affordable housing, and other individual circumstances.

40. Adopted DMP policy DMP 15 confirms the Core Strategy target (policy CP2) that 50% of all new homes in the borough will be affordable. The maximum reasonable amount will be sought on sites capable of providing 10 units or more. 70% of new affordable housing should be social/affordable rented housing and 30% intermediate housing at affordability levels meeting local needs. Where a reduction to affordable housing obligations is sought on economic viability grounds, developers should provide a viability appraisal to demonstrate that schemes are maximising affordable housing output.
41. London Plan policy 3.12 says that the maximum reasonable amount of affordable housing should be sought when negotiating on schemes and that negotiation should take account of their individual circumstances including development viability.
42. Within the supplied pre-application materials, reference is made to this development achieving 35% affordable housing which is regarded as consistent with the Mayor's requirements. This refers to the draft of the GLA Housing SPG which this borough has yet to comment or set out its position on this. Notwithstanding the content of the SPG, the London Plan policy is one that seeks to maximise affordable housing provision, with a Brent target as set in the Core Strategy and recently reinforced with the adoption of the Development Management Policies of 50%. The Local Plan also seeks 25% of dwellings to be 3 bed or more (the application just falls short), as well as seeking a minimum 20 sqm of amenity space per dwelling.
43. In terms of assessment against Brent's local policy, the current proposal is to deliver a minimum level of 32% affordable housing (when counting units) within the development. The affordable offer would consist of 8x 1 bed flats, 8x 2 bed flats and 8x 3 bed flats. This falls significantly short of Brent's 50% target.
44. The affordable units have a tenure split of 67% affordable rent and 33% shared ownership, which is broadly in line with Brent's 70:30 target tenure split within DMP15. The provision of a 75:25 tenure split on the 3 bedroom flats is welcomed as it increases the provision of family sized units for affordable rent, for which there is a strongly identified need within the borough.
45. Weight is given to the fact that it may be unviable to deliver 50% affordable housing within this development and as such a Financial Viability Assessment (FVA) will be undertaken at full application stage to test whether the affordable housing proposed is in keeping with the development viability. Based on the findings of the FVA, the planning department may consider it necessary to negotiate with the developer to achieve a more attractive affordable housing offer before any consent is granted.

## **Issue 6**

### **Impact on amenities of neighbouring properties**

46. The proposed building has been designed so as to not project beyond the established rear building line of the building to the east along Elm Road (07/3058). The rear of the new development along the St John's Road frontage is set in 9m from this eastern boundary. The acceptability of this relationship will require further consideration and it is likely that additional information will be required to show how this relationship works.
47. The plans identify other nearby habitable room windows (such as those above the primary shopping frontage on the High Road), and the plans make clear that more than 20m of separation distance is established between facing habitable rear windows in these instances.
48. The wider impact of a building of this height cannot be assessed using the Council's amenity impact standards (within SPG17). We will therefore require the developer to undertake a daylighting and sunlight assessment to ascertain the wider impact of this proposal on surrounding premises, at different times the day and year. The findings of

this report will be taken into account as part of a full application assessment. If it is found that significant losses of amenity would occur as a result of this development, then this impact will need to be weighed against any other benefits or drawbacks of this proposal to consider if the overall development is acceptable.

## **Issue 7 Transport**

49. The site is located within Wembley town centre, so is within a Controlled Parking Zone and has excellent access to public transport services. Car-free housing is therefore promoted and the absence of any car parking for the flats is welcomed, as long as a 'car-free' agreement to remove the rights of future residents is secured by condition.
50. The cycle stores will need to satisfy London Plan standards so will need to accommodate 119 bikes. The refuse stores are well positioned to allow easy access by Brent's contractors and they will need to accommodate 16 Eurobins in total.
51. Although standards would allow two car parking spaces for a shop, the absence of any parking for the retail unit is acceptable in this town centre area, given the availability of nearby public parking.
52. Further clarity is sought from the applicant with regard to servicing of the proposed retail unit and the Boots (A1) unit. Loading from the adjoining streets (High Road, St. John's Road or the Elm Road service road) would be obstructive. An off-street loading area for deliveries to the proposed retail unit and Boots is therefore required and this can be accessed from either the rear service road or St. John's Road.
53. A publicly accessible bicycle stand should be provided, but as there is no external area around the building, this will need to be funded for provision on the footway fronting the commercial unit within a full application.
54. It will be important for the applicant to provide a Transport Statement and Travel Plan Statement with a full application to ensure a full consideration of wider transport impact. The Travel Plan will need to include a promotion of local Car Clubs to future residents, including subsidised membership.

## **Issue 8 Environmental Health**

55. Key considerations are noise insulation for residents given the proximity to commercial premises, impact on air quality, construction noise and dust, asbestos and the potential for light pollution from any external lighting.
56. The abovementioned concerns will be addressed as part of a full planning application with planning conditions or informative notes as appropriate. The noise insulation will be addressed through requirements for:
  - Adherence to (and a test of) the relevant British Standards for sound insulation;
  - The submission of an air quality impact assessment to consider the air quality impact building works and the operations of the building will have on local air quality and future residents;
  - The submission of an air quality neutral assessment in accordance with GLA guidance;
  - A construction method statement to detail measures that will be taken to control dust, noise and other environmental impacts of construction , and;
  - A lighting spillage plan to demonstrate that the external lighting from the new development will not impact on the surrounding residential premises.

## **OTHER CONSIDERATIONS**

57. A detailed energy/sustainability strategy would need to be submitted as part of any subsequent full application to demonstrate compliance with the Mayor's strategy of Be Lean, Be Clean, Be Green, as well as London plan policies relating to reduction carbon emissions and renewable energy, in accordance with London Plan policy 5.2.

58. In view of the height of the development as proposed, the scheme is referable to the GLA under the provisions of the Mayor of London Order 2008.

### **PLANNING OBLIGATIONS**

59. If approved, planning obligations under a Section 106 agreement will be necessary to secure and monitor certain aspects of the development. With the information available at present, it is likely that a Section 106 agreement will be needed for the following aspects:

- The delivery of affordable housing - it may be deemed necessary to review the viability of the development and to alter the affordable housing provision accordingly throughout the development process as part of this agreement.
- To enable the development of the proposal to improve the training and employment of Brent residents.
- To secure and monitor a travel plan.
- To secure funding for the provision of a publically accessible cycle stand on the public footway fronting the commercial unit.

### **COMMUNITY INFRASTRUCTURE LEVY (CIL)**

60. This would be development that is liable for Mayoral and Brent CIL. The level of liability that this would attract will be confirmed at a later stage when the precise quantum and form of proposed development is known.

### **CONCLUSIONS**

61. Members should note the above development is still in the pre-application stage and that additional work remains to be carried out prior to the submission of any subsequent planning application.