

# COMMITTEE REPORT

Planning Committee on  
Item No  
Case Number

13 September, 2022  
04  
21/3941

## SITE INFORMATION

RECEIVED	18 October, 2021
WARD	Alperton
PLANNING AREA	Brent Connects Wembley
LOCATION	Part of Westend Saab, 2A Bridgewater Road and Boyriven Textile, Bridgewater Road, Wembley, HA0 1AJ
PROPOSAL	Demolition of the existing buildings and structures, the erection of a 'co-location' scheme ranging in height from 2 to 19 storeys, incorporating industrial floorspace with residential accommodation (Use Class C3), together with associated landscaping, access arrangements, car and cycle parking, servicing and refuse and recycling facilities
PLAN NO'S	See Condition 2.
LINK TO DOCUMENTS ASSOCIATED WITH THIS PLANNING APPLICATION	<p><b><u>When viewing this on an Electronic Device</u></b></p> <p>Please click on the link below to view <b>ALL</b> document associated to case <a href="https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&amp;keyVal=DCAPR_157481">https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&amp;keyVal=DCAPR_157481</a></p> <p><b><u>When viewing this as an Hard Copy</u></b> .</p> <p><b>Please use the following steps</b></p> <ol style="list-style-type: none"><li>1. Please go to <a href="https://pa.brent.gov.uk">pa.brent.gov.uk</a></li><li>2. Select Planning and conduct a search tying "21/3941" (i.e. Case Reference) into the search Box</li><li>3. Click on "View Documents" tab</li></ol>

## 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. *Affordable Housing* – comprising 54 affordable rent units (13 x 1bed, 18 x 2bed and 23 x 3bed) at London Affordable Rent levels and 119 shared ownership units (45 x 1bed, 67 x 2bed and 7 x 3bed) in line with the household income cap and eligibility criteria for intermediate products set out in the London Plan. Early stage viability review if substantial implementation does not occur within two years.
4. *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 £157,781.25) to Brent Works for job brokerage services.
  - d. where it is not possible to achieve employment targets in line with the approved Employment and Training Plan, a commitment to pay the associated financial contributions
5. *Energy assessment*
  - e. Detailed design stage energy assessment to secure a commitment to net zero carbon with a minimum of 35% carbon reduction on site for both residential and commercial elements, with any shortfall to be secured via a financial contribution towards Brent's carbon offset fund (50% of contribution payable prior to material start).
  - f. Post-construction energy assessment and final balance of financial contribution (payable prior to occupation) if zero-carbon target not achieved on site.
  - g. 'Be seen' energy performance monitoring and reporting
6. *Amenity space provision and play off-site* – Financial contribution of £50,000 to Brent Parks Services.
7. *Controlled Parking Zone* – Financial contribution of £80,000 towards implementation of Controlled Parking Zone in the vicinity. Residential parking permit restrictions.
8. *Travel Plan* – Submission and implementation of Travel Plan for residential and commercial uses, including monitoring and review arrangements under the i-TRACE or TRICS survey methodology, and three years' free car club membership for eligible residents.
9. *Highway Works* under a S38/S278 Agreement to:
  - (i) reduce the width of the existing vehicular crossover onto Bridgewater Road at the southeastern end of the site frontage to 4.8m to match the width of the proposed service road;
  - (ii) extend the central traffic island in Bridgewater Road across its existing 7.5m wide gap in front of the southeastern vehicle access in order to prevent vehicles turning right into the site; and
  - (iii) construct a highway verge of at least 1.5m width and a footway of at least 2.6m width along the Bridgewater Road frontage and to dedicate the area of the footway that lies within the site boundary as highway maintainable at public expense.
10. *Street trees* – Financial contribution of £5,000 towards the planting and maintenance of two street trees on Bridgewater Road, payable in the event of existing street trees being removed to facilitate the development, at a rate of £2,500 per tree.

11. *Surveys of television and radio reception in surrounding area*, and any mitigation works agreed

12. *Financial contributions to Transport for London*: for improvements to public transport services (£217,000) and step-free access at Alperton Station (£218,845).

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. Quantum and use of commercial floorspace
4. Number of residential units
5. Provision of parking etc including electric vehicle charging points and parking management plan
6. Units provided to M4(2) or M4(3) standards
7. Water use limited to 105lppd
8. Communal TV satellite
9. Non Road Mobile Machinery
10. Whole life cycle carbon reporting
11. Tenure blind podium
12. Compliance with biodiversity recommendations
13. Compliance with drainage strategy
14. Compliance with air quality and noise reports

#### *Pre-commencement*

15. Construction Method Statement
16. Construction Logistics Plan
17. Arboricultural Method Statement & Tree Protection Plan

#### *Post-commencement*

18. District heat network connection
19. Digital connectivity
20. Site investigation
21. Materials samples
22. Landscaping scheme
23. Details of PV panels

#### *Pre-occupation or use*

24. Contaminated land remediation measures
25. Site management and maintenance plan including delivery and servicing plan
26. Thames Water surface water network upgrades
27. BREEAM certification
28. Post-construction circular economy report

### Informatives

1. CIL Liability
2. Thames Water advice
3. Affinity Water advice
4. Liaison with London Underground
5. Party Wall Act
6. Building near boundary
7. Asbestos removal
8. Quality of imported soil

9. London Living Wage
10. Notify Highways of work starting
11. British Standards for trees and landscaping

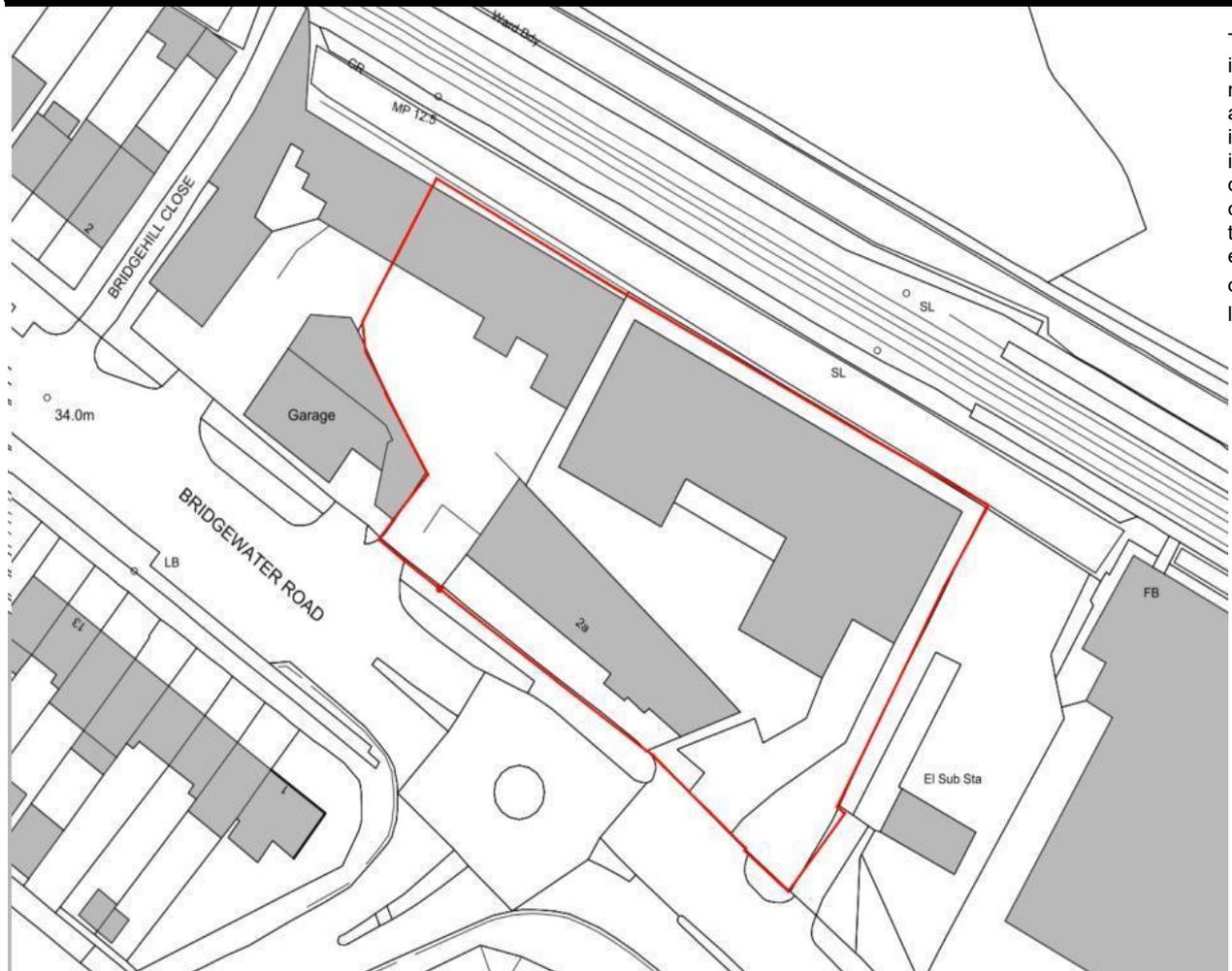
That the Head of Planning is delegated authority to make changes to the wording of the committee's decision (such as to delete, vary or add conditions, informatives, planning obligations or reasons for the decision) prior to the decision being actioned, provided that the Head of Planning is satisfied 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

	<b>Planning Committee Map</b>
Site address: Part of Westend Saab, 2A Bridgewater Road and Boyriven Textile, Bridgewater Road, Wembley, HA0 1AJ	
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This map is indicative only.

## PROPOSAL IN DETAIL

The application seeks permission for the demolition of the existing buildings and structures on site, and the construction of a building ranging in height from 2 to 19 storeys, incorporating 173 new homes, all of which would be affordable housing (58 x 1bed, 85 x 2bed and 30 x 3bed), together with 2,228sqm of light industrial floorspace (B1(b) and B1(c)) with associated access, parking, cycle storage and bin storage, and residential amenity space.

## EXISTING

The application site comprises a single-storey car showroom situated on the northeastern side of Bridgewater Road, opposite the intersection with Manor Farm Road, a basement car park to the rear of the showroom (formerly the Boyriven Textiles building) and part of a single-storey workshop building to the rear of an adjacent hand car wash.

The Piccadilly Underground line tracks run directly north of the site, and there is an electricity substation immediately to the southeast. To the northwest are remaining industrial buildings and, separated from the industrial buildings by a pedestrian footpath leading across the railway tracks into One Tree Hill Recreation Ground to the north, a row of traditional two storey housing. The wider surrounding area is mixed in character, comprising traditional residential areas to the west, the Recreation Ground and Alperton School to the north, Alperton Bus Garage to the southeast and commercial and industrial buildings to the south, with large-scale redevelopment occurring in Alperton Growth Area further to the southeast. The site is not within a Conservations Area nor are any of the buildings occupying the site listed buildings.

The site lies within a Locally Significant Industrial Site (LSIS) which is designated in Brent's Local Plan for "intensification and some co-location" potentially allowing both industrial capacity and new homes. It is within the boundaries of Alperton Growth Area as defined in the Local Plan and also forms part of a wider site allocation.

## AMENDMENTS SINCE SUBMISSION

Amended plans and documents were received on 2 December 2021, updating the thermal comfort strategy to allow 124 of the residential units to use passive ventilation via acoustically attenuated openings and openable windows rather than mechanical ventilation. This led to minor external changes comprising addition of attenuator units with full height decorative external panels, adjustments to window and brick detailing, and changes to some window openings. Further amendments and additional information were received on 20 January 2022, including information on urban greening and residential amenity space.

Further amendments to the ground, first and second floor layouts were received on 31 March 2022, in response to comments from HSE Gateway One. These included:

- Relocation of residents' lounge from second floor of Block B to ground floor of Block C
- Relocation of two residential homes from first floor to second floor of Block B, and consequent relocation of part of the commercial floorspace from ground floor to first floor.
- Escape route corridor provided from car park to exterior of building, adjacent to Block A.
- Protected lobbies created on all residential floors.
- Risers relocated, resulting in minor changes to internal layouts of homes. This
- Block A roof enclosure redesigned to accommodate mechanical and electrical plant requirements and relocation of risers/smoke shafts.
- Minor changes in the layout and configuration of ancillary spaces including cycle stores and plant rooms.

These amendments did not materially alter the nature of the proposal, and did not require a further period of consultation other than as detailed in the report.

## SUMMARY OF KEY ISSUES

The key planning issues for Members to consider are set out below. Four letters of objection and one neutral comment were received regarding some of these matters. Members will have to balance all of the planning issues and objectives when making a decision on the application, against policy and other material

considerations.

**Neighbour objections:** Four neighbour objections and one neutral comment have been received, raising concerns about additional pressure on local services and infrastructure, the visual impact on the character of the area, overlooking onto neighbouring properties, cumulative impact on local views and character of recent developments, inadequate on-site parking and impact of parking on Bridgewater Road, increase in traffic, increased air and noise pollution, fire safety concerns associated with tall buildings, need for pavement renewal and wider infrastructure improvements in area. These issues are considered at the relevant points in the report.

**Principle of development:** The proposal is for a residential-led mixed use development that responds well to the emerging policy context encouraging co-location of residential and industrial uses on appropriate sites. The proposal is similar in nature to the consented scheme on this site, reference 19/4541, but with an increase in both the industrial floorspace and number of residential units. The floorspace proposed exceeds the industrial capacity of the site, and the provision of new purpose-built industrial units would help to facilitate economic growth in the area. The proposal for 173 residential units would contribute to the borough's housing targets in a Growth Area and Housing Zone. The proposal is acceptable in principle.

**Affordable housing and housing mix:** The proposed residential units would all be affordable housing, including 50% of units at a policy-compliant tenure split (70% at London Affordable Rent and 30% shared ownership) and the remaining 50% for shared ownership. The proposal complies with Brent Policy BH5 and a viability review mechanism is not required. Whilst the proportion of family-sized units does not meet the 25% target set out in Policy BH6, overall the provision of 100% affordable housing is considered a significant planning benefit to outweigh concerns regarding the low proportion of family-sized units.

**Design and appearance:** The proposal is for two residential point blocks at 13 stories and 19 stories respectively, set back from the road and linked by a central podium garden at second floor level above a two-storey building providing light industrial floorspace and an active frontage on Bridgewater Road. The design is considered to be of high quality, and the overall height and massing are considered appropriate in terms of the emerging street scene.

**Fire safety:** The proposal has been reviewed by the Health & Safety Executive (HSE) under the gateway one process, and has been amended to address initial concerns highlighted in this process. The HSE has now confirmed that the proposal is acceptable in terms of fire safety, subject to further review under gateways two and three.

**Residential living standards:** The 173 units would all meet or exceed minimum space standards and the number of single-aspect units has been minimised through design. All units would have private balconies and access to attractively landscaped communal amenity spaces including a range of play spaces. A shortfall in amenity space of 704sqm against the standards set out in Policy BH13 would be mitigated by a financial contribution of £50,000 towards improvements to the nearby One Tree Hill Recreation Ground, secured through the s106 agreement. Overall the proposal would provide a high standard of residential accommodation.

**Relationship with neighbouring properties:** The proposal would retain adequate separation distances to allow adjoining sites to come forward for redevelopment in a similar manner. Impacts on daylight and sunlight to neighbouring properties, and overshadowing to neighbouring external amenity spaces, have been assessed. These are considered to be minimal given the emerging high density character of the area and the scale of the development, and would not be materially different to the impacts of the consented scheme.

**Sustainability and energy:** The Energy Strategy demonstrates that carbon emissions for the residential use would be reduced by 67% and for the commercial use by 49%, compared to the Building Regulations 2013 baseline. This exceeds the London Plan policy targets for on-site reductions, and a financial contribution to Brent's carbon offsetting fund would be secured through the s106 agreement, to achieve a zero-carbon development. The industrial floorspace would be designed to achieve BREEAM Excellent, to comply with Brent's Policy BSU11.

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

**Flood risk and drainage:** The drainage strategy proposed includes blue-roof systems to hold rainwater

temporarily and water butts to irrigate soft landscaped areas. It would represent a betterment in comparison to the existing situation, and is considered to comply with policy and be appropriate for the proposed development.

**Trees, landscaping and biodiversity:** All trees on or adjoining the site are of low arboricultural value and the ecological value of the site and its surroundings is low. One tree would be removed to facilitate the development, and tree protection measures for retained trees have been proposed, together with new tree planting and ecological enhancements provided as part of the landscaping scheme.

**Urban greening:** The proposal would achieve an urban greening factor of 0.4 and would represent an improvement compared to the consented scheme and a significant uplift in the greening of the site. It is considered to have maximised the urban greening potential of the site.

**Microclimate and satellite reception:** The impacts of the proposed tall buildings upon wind conditions within the development and in the surrounding area, and upon the reception of TV and radio services within the area, have been assessed and, with suitable mitigation measures secured, would be acceptable.

**Transport considerations:** The one-way internal service road would allow servicing of the industrial units and refuse collection for the residential units, and would provide access to ten on-site disabled car parking spaces. This level of parking is considered to be appropriate given the level of public transport accessibility (PTAL 4), subject to a financial contribution of £80,000 towards implementation of a Controlled Parking Zone, car club membership and operation of a travel plan, all of which would be secured through the s106 agreement. The access arrangements have been welcomed by your Transport officers and Transport for London, and are considered to contribute to the Healthy Streets approach and Vision Zero objectives. Cycle storage would be provided to London Plan standards, including five storage rooms for 319 cycles for residents, a cycle store and showering facilities for the workspace, and short-stay 'Sheffield' stands along the service road.

**RELEVANT SITE HISTORY**

**05/2773**

Full Planning Permission  
 Demolition of existing warehouse building and the erection of a 3-storey building for use as three B1 light-industrial units on each of the ground floor and first floors and a D2 function room on the second floor, with a basement to provide storage and parking for 26 cars, alterations to vehicular and pedestrian access to site and provision of cycle-parking and refuse storage (as clarified in writing by Mr Kassim, dated 14th November 2005) and subject to a Deed of Agreement dated 22nd December 2005 under Section 106 of the Town and Country Planning Act 1990, as amended -  
 Granted 23 December 2005. [*Officer Note:* This permission has been implemented in part, the basement car park having been constructed but not the remainder of the building].

**19/4541**

Full Planning Permission  
 Demolition of the existing buildings and structures, the erection of a 'co-location' scheme ranging in height from 4 to 19 storeys, incorporating industrial floorspace with residential units, together with associated landscaping, vehicular access arrangements, car and cycle parking, servicing and refuse and recycling facilities, subject to Deed of Agreement under Section 106 of Town and Country Planning Act dated 9th December 2020.  
 Granted 10 December 2020.

**CONSULTATIONS**

236 neighbouring properties were consulted by letter on 25 October 2021. A press notice was published on 28 October 2021 and a site notice was posted near the site on 29 October 2021.

Four objections and one neutral comment were received, and are summarised as follows:

Comment	Officer response
Additional pressure on local services and infrastructure, including cumulative impacts	New developments are liable for Community Infrastructure Levy payments, which contribute towards improvements in local services and

	<p>infrastructure to support the increased population.</p> <p>The amount and type of infrastructure required to support new developments has been considered within the Infrastructure Delivery Plan which provides an evidence base for the newly adopted Local Plan.</p>
The visual impact on the character of the area, including cumulative impacts	This issue is discussed under 'Design, scale and appearance'
Overlooking onto neighbouring properties	This issue is discussed under 'Relationship with neighbouring properties'
Increased air and noise pollution	This issue is discussed under 'Environmental health considerations'
Fire safety concerns associated with tall buildings	This issue is discussed under 'Fire safety'
Inadequate on-site parking and servicing within the site for commercial units, and concerns regarding impact on parking on Bridgewater Road and increased traffic. Controlled Parking Zone should be introduced.	This issue is discussed under 'Transport considerations'
With Lidl supermarket operating opposite the existing bus garage, it is vital that Brent Council liaises with Transport for London to have the green traffic filter reinstated to reduce congestion of vehicles from Glacier Way. There is no danger of any collision as this will operate at the same time frequency of vehicles turning right into Glacier Way from Bridgewater Road side.	These works are not necessitated by the current planning application. The highway flow and safety implications of the scheme are discussed under 'Transport considerations'.
The council should purchase the site and redevelop it as a green open space for residents.	This matter is not within the scope of the current planning application, and this site is not designated for the provision of additional public open space.
Need for pavement renewal in area.	Community Infrastructure Levy funding could contribute towards works of this type, however this is an existing situation and does not arise as a result of this development.
Concerns regarding road accidents in the surrounding area.	The highway flow and safety implications of the scheme are discussed under 'Transport considerations'.
Street tree planting should be increased.	Community Infrastructure Levy funding could contribute towards works of this type, however the development does not create a need for more street tree planting.
Management company for the site could be made responsible for maintenance of vegetation on steps to canal. Bench seating should be provided along the canal side.	The canalside throughout England and Wales is under the management of the Canal & Rivers Trust. This site is not adjacent to the canal and a contribution to improving the canalside environment is not considered necessary in this case.
Local residents do not feel safe due to the amount of development taking place.	The proposal would establish a strong building line along Bridgewater Road with active

frontages, and increased activity. The scheme proposes to widen and enhance the public realm outside the building.

### ***Internal and statutory consultees***

#### **Greater London Authority / Transport for London initial Stage 1 response:**

Land use principles: In view of the Council's emerging plan-led strategy of intensifying industrial capacity on LSIS (including the application site) and the quantum of replacement industrial floorspace proposed, the residential-led redevelopment of this site within a designated Housing Zone is strongly supported in line with London Plan Policies E4, E6 and E7 and Good Growth Objective GG2.

Affordable housing: The scheme proposes 100% affordable housing, with a tenure mix of 35% London Affordable Rent and 65% shared ownership by habitable room (70%:30% when assessed against the Council's requirement of 50% affordable housing), which is strongly supported and qualifies for the Fast Track Route.

Heritage and Urban design: No harm would be caused to the locally listed Alperton London Underground station and the scheme's height/massing is consistent with the existing and emerging context and is acceptable, subject to the matters raised in relation to impacts being satisfactorily addressed. Other matters raised in relation to dual aspect units, private amenity and public realm should also be addressed.

Transport: A contribution of £217,000 towards bus capacity enhancements is sought, as well as a contribution of £218,845 towards step-free access at Alperton station. Appropriate legal agreements covering various transport-related plans should be secured.

Sustainable development and Environmental issues: The energy strategy is generally compliant with the London Plan; however, further information is required to validate the results and determine the quantum of carbon off-set contribution. A WLC excel template must be provided and post-construction monitoring secured for WLC, circular economy performance and recycling and waste.

**Affinity Water:** No objection. Informatives suggested. Water efficiency measures recommended [officer note: these would be secured by condition].

**Thames Water:** - No objection on foul water sewerage network infrastructure capacity. Surface water network upgrades or housing and infrastructure phasing plan required [officer note: this would be secured by condition].

**Environmental Health (including Noise Control Team):** No objection subject to conditions.

**Sustainability and energy manager:** No objection. Notes no existing district heat network in surrounding area.

**Lead Local Flood Authority:** No objection. Notes proposal would be a betterment compared to existing situation.

**Health and Safety Executive:** Based on the revised plans the scheme does not result in any significant land use planning considerations, and can be further assessed during the later regulatory considerations.

#### **Pre-application consultation**

The applicant's Statement of Community Involvement sets out the public consultation and engagement activities undertaken by the applicants prior to submitting the application. These included a leaflet drop to 2,711 neighbouring properties and individual letters sent to ward councillors and Wembley Central & Alperton Residents Association, giving details of the project website and online consultation events, in addition to a freephone number and freepost address. Three online events were held on 19 July, 20 July and 28 July 2021. Twelve households took part in the online events and further comments were submitted via the online feedback form.

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

## **POLICY CONSIDERATIONS**

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

The development plan is comprised of the London Plan 2021 and the Brent Local Plan 2022.

Key policies include:

#### London Plan 2021

GG1	Building strong and inclusive communities
GG2	Making the best use of land
GG3	Creating a healthy city
GG4	Delivering the homes Londoners need
GG5	Growing a good economy
D3	Optimising housing density
D4	Delivering good design
D5	Inclusive design
D6	Housing quality and standards
D7	Accessible housing
D8	Public Realm
D9	Tall Buildings
D12	Fire safety
D13	Agent of Change
D14	Noise
E2	Providing suitable business space
E3	Affordable workspace
E4	Land for industry, logistics and services to support London's economic function
E6	Locally Significant Industrial Sites
E7	Industrial intensification, co-location and substitution
E8	Sector growth opportunities and clusters
H1	Increasing housing supply
H4	Delivering affordable housing
H5	Threshold approach to applications
H6	Affordable housing tenure
H7	Monitoring of affordable housing
HC1	Heritage conservation and growth
G1	Green infrastructure
G5	Urban greening
G6	Biodiversity and access to nature
S4	Play and informal recreation
SI1	Improving air quality
SI2	Minimising greenhouse gas emissions
SI4	Managing heat risk
SI5	Water infrastructure
SI6	Digital connectivity infrastructure
SI7	Reducing waste and supporting the circular economy
SI13	Sustainable drainage
T1	Strategic approach to transport
T2	Healthy Streets
T4	Assessing and mitigating transport impacts
T5	Cycling
T6	Car parking
T7	Deliveries, servicing and construction

#### Brent Local Plan 2022

DMP1	Development management general policy
BP7	South West
BSWGA1	Alperton Growth Area
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
BH13	Residential amenity space
BE1	Economic growth and employment opportunities for all
BE2	Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS)
BHC1	Brent's Heritage Assets
BGI1	Green and blue infrastructure in Brent
BGI2	Trees and woodlands
BSUI1	Creating a resilient and efficient Brent
BSUI2	Air quality
BSUI4	On-site water management and surface water attenuation
BT1	Sustainable travel choice
BT2	Parking and car free development
BT3	Freight and servicing, provision and protection of freight facilities
BT4	Forming an access on to a road

The following are also relevant material considerations:

The National Planning Policy Framework 2021  
 Planning Practice Guidance

### Supplementary Planning Guidance

Mayor of London's Affordable Housing and Viability SPG 2017  
 Mayor of London's Housing SPG 2016  
 Mayor of London's Character and Context SPG 2014  
 Mayor of London's Housing Design Standards LPG (draft)  
 Mayor of London's Play and Informal Recreation SPG 2012  
 Mayor of London's Urban Greening Factor LPG (draft)  
 Mayor of London's Air Quality Positive LPG (draft)  
 Mayor of London's Be Seen energy monitoring LPG (draft)  
 Mayor of London's Circular economy statements LPG  
 Mayor of London's Energy Planning Guidance  
 Mayor of London's The control of dust and emissions in construction SPG  
 Mayor of London's Whole life carbon LPG  
 Mayor of London's Air quality neutral LPG (draft)  
 Mayor of London's Sustainable Transport, Walking and Cycling (draft)

SPD1 Brent Design Guide 2018  
 Brent Waste Planning Guide 2015  
 Planning Obligations SPD 2022

## **DETAILED CONSIDERATIONS**

### **Planning history and background**

1. The proposal presents an amended version of the consented scheme for the redevelopment of the site (reference 19/4541). The consented scheme could be legally implemented at this time and is therefore a material planning consideration of significant weight in the determination of this application. The main points of comparison between the two applications are summarised below and considered in more detail at the relevant points in the report:
  - The number of residential homes proposed is 173, compared to 124 in the consented scheme (an uplift of 49 homes). As with the consented scheme, all units would be provided as affordable housing in a policy-compliant mix of tenures. The scheme would secure 54 London Affordable Rented homes (the consented scheme secured 47 London Affordable Rented homes) and 119 intermediate homes (the consented scheme secured 77 intermediate homes).
  - The amount of industrial floorspace proposed is 2,228sqm (GIA) compared to 1,878sqm in the consented scheme. It would continue to fall within use classes E(g)(ii) and E(g)(iii) as per the consented scheme.
  - The bulk, scale and massing of the proposal would be altered, with the base element of the building

increasing from one to two storeys and the lower point block (Block A) increasing in height from eleven to 13 storeys. Both the three-storey frontage building and the seven-storey central linking element at the rear would be removed, and the width and depth of both point blocks would be increased. The height of the taller Block B would remain at 19 storeys.

- Parking provision would increase from nine to ten disabled parking spaces (including one for commercial tenants and nine for residential use).
- It should be noted that since the grant of the 2019 consent, the London Plan was adopted in March 2021 and Brent's Local Plan adopted in February 2022. These policies were in draft form during the assessment of the extant permission but now carry full weight.

## **Principle of development**

### Policy background

2. 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, and Brent's Local Plan Policy BH1 reflecting these targets. Policy BH2 identifies priority locations for new homes within the Borough, which includes Growth Areas and Site Allocations. The site lies within the Alperton Growth Area and forms part of a site allocation under Policy BSWG1. Furthermore, Policy BP7 seeks for a minimum of 6,800 additional homes to be provided within the Alperton Growth Area through residential led mixed use development.
3. The site is in existing employment use and covered by a Locally Significant Industrial Site (LSIS) designation. London Plan Policy E4 proposes to prevent further losses of industrial land across London as a whole. Boroughs are expected to meet their identified needs for industrial floorspace, which in the case of Brent requires an increase upon the existing floorspace in the borough, to support London's economic function. Further detail on how this could be achieved alongside other policy priorities such as meeting housing targets is provided in Policy E7, which identifies the potential for LSIS-designated sites to accommodate industrial floorspace co-located with other uses, and indicates that this should be through a plan led approach or as part of a co-ordinated master-planning process in collaboration with the GLA and relevant borough, rather than through ad-hoc planning applications.
4. This policy is reinforced in Brent's Policy BE2, which looks to establish the framework to meet both housing need and industrial capacity, and land is identified where the two can be provided together on the same site (known as co-location). This LSIS site (Alperton North) is designated for intensification and co-location under this policy and the site allocation (BSWSA1: Alperton Industrial Sites). As a minimum, the greater of either the existing industrial floorspace or the industrial capacity (a 0.65 plot ratio) should be provided across the wider site allocation.
5. The site is also part of the Alperton Housing Zone, one of a number of such areas designated by the Mayor of London in November 2015 as having the capacity to deliver a substantial quantum of new housing, and for which additional GLA funding has been made available to support this housing growth.

### Industrial floorspace

6. The site currently contains a vacant car showroom (Use Class sui generis) and industrial units (Use Class B1c) of approx. 620sqm area, together with areas of hardstanding and a semi-basement car park. The car park was constructed as part of a building approved under planning permission reference 05/2773 (although the rest of the building has never been constructed, the permission has been implemented with the construction of the basement and could lawfully be completed at any time). This previously approved building would provide 1,393sqm approx. of industrial floorspace in addition to D2 assembly hall floorspace. The total industrial floorspace of the existing site would therefore be 2,033sqm, if the extant permission were completed. However, given changing economic circumstances and the changing nature of demand, your officers consider that the extant permission is unlikely to be completed and that the approved building cannot be considered to contribute to the existing floorspace on site. Therefore the existing industrial floorspace is considered to be 620sqm.
7. As noted above, the BSWSA1 site allocation requires the higher of the existing industrial floorspace or 0.65 times the area of the site to be provided as industrial floorspace in any redevelopment of the site. The latter equates to 2,275sqm for this site. It should be noted that the recent extant consent ref 19/4541 would provide only 1,878sqm of new light industrial floorspace, a shortfall against the site

allocation requirement. This was accepted at the time as it was considered that industrial capacity could be intensified across the wider site allocation without requiring increased capacity on each individual site.

8. The proposed provision of 2,228sqm of light industrial floorspace would exceed the amount secured through the recent extant consent but would fall marginally below the 2,275sqm required in the site allocation. Notwithstanding the marginal shortfall, this is considered to be a significant contribution to the local economy and employment opportunities, and to represent a planning benefit of the scheme.
9. The industrial floorspace would be provided within a two-storey building that would act as a base element for the two residential point blocks. The majority of the floorspace would be at first floor, as the ground floor would also provide space for the two residential cores, plant and other ancillary functions, undercroft parking and a residents' lounge. The plans show how the first floor could be laid out as a number of units of varying sizes although the detailed layout is indicative at this stage. The building has been designed to provide flexible floorspace with goods lift provision, to meet the needs of creative ventures, start-up businesses and SMEs in the E(g)(ii) and E(g)(iii) industrial use classes, and would be secured for these uses by condition. The generous internal floor to ceiling heights, open plan layouts, convenient access to the highway and on-site servicing provision would enhance the attractiveness of the units for business users and help to facilitate economic growth in the area.
10. Brent's Policy BE2 seeks 10% of employment floorspace to be affordable workspace in redevelopment of LSIS sites. However, complying with this requirement is likely to impact on other benefits of the scheme, including a reduction in affordable housing that could be delivered on site and on balance, the provision of additional affordable homes is considered to outweigh the provision of 10% (approximately 223sqm) of Affordable Workspace in this particular instance. The extant consent is also a material consideration, with no Affordable workspace secured within that consent.

#### Residential development

11. The proposal would provide 173 new homes in an accessible location within the Alperton Growth Area. The introduction of housing in this location is supported by the London Plan and the site is within a priority location for new homes as identified in Brent's Policies BH2, BSWSA1 and BE2. The proposal would make a significant contribution to the Borough's housing targets, and this aspect of the proposal is considered to be acceptable in principle subject to other material planning considerations.

#### Conclusion

12. The industrial element of the scheme falls marginally short of the policy requirement set out in Brent's Policies BE2 and BSWSA1, in terms of the amount of floorspace provided. Whilst the proposal would not include any affordable workspace, it would provide 100% affordable housing, making a significant contribution to the borough's overall housing needs. The amount of affordable workspace that would be required (approx 223sqm) is unlikely to be viable for an affordable workspace operator to take on. Furthermore, the affordable housing provision is considered to be a substantial planning benefit to outweigh concerns regarding affordable workspace.
13. The proposal responds well to the adopted London Plan and local policy context and is considered to be acceptable in principle.

#### **Affordable housing and housing mix**

##### Policy background

14. London Plan Policies H4, H5 and H6 set out the Mayor's commitment to delivering 'genuinely affordable' housing. The strategic target remains at 50% affordable housing, and a fast track route is provided for applications proposing at least 35% affordable housing (50% on public sector or industrial land) with a policy-compliant tenure split. Applications not meeting the criteria for the fast track route are subject to viability testing, to determine the maximum reasonable amount of affordable housing that the scheme can support.
15. Policy H6 requires affordable housing provision to include a minimum of 30% low cost rented homes, allocated according to need and for Londoners on low incomes (Social Rent or London Affordable Rent); a minimum of 30% intermediate products; and 40% to be determined by the borough based on identified need.

16. Brent's Local Plan Policy BH5 supports this approach and sets a target of 70% of affordable homes being for social rent or London Affordable Rent and the remaining 30% being for intermediate products. This split marries up with London Plan Policy H6 by design, with Brent having considered that the 40% based on borough need should fall within the low cost rented homes category.

### Assessment

17. The proposal would provide the following mix of units:

	1bed	2bed	3bed	Notes
54 x London Affordable Rented homes *  (47 London Affordable Rented homes in consented scheme)	13 homes  (14 homes in consented scheme)	18 homes  (18 homes in consented scheme)	23 homes  (15 homes in consented scheme)	70% of 87 homes by habitable room
33 x shared ownership homes *  (15 homes in consented scheme)	12 homes  (4 homes in consented scheme)	19 homes  (10 homes in consented scheme)	2 homes  (1 home in consented scheme)	30% of 87 homes by habitable room
86 x shared ownership homes **  (62 homes in consented scheme)	33 homes  (17 homes in consented scheme)	48 homes  (40 homes in consented scheme)	5 homes  (5 homes in consented scheme)	50% of 173 homes
Total homes	58	85	30	173
% of total	33.5%	49.1%	17.3%	

\* These 87 homes represent 50% of the total provided as affordable housing, at a tenure split of 70:30 by habitable room.

\*\* These 86 homes would be shared ownership, above and beyond a policy compliant level of affordable housing.

18. Based on 100% affordable housing across the whole scheme, the tenure split would be 65:35 (by habitable room) shared ownership to London Affordable Rent. However it is important to recognise that both Local Plan policies and the Mayor's policies seek a target of 50% affordable housing on industrial sites. In this case, half of the homes (87 homes in total) would be provided as affordable housing at a policy compliant tenure split (77:23 London Affordable Rent to shared ownership by habitable room, with the London Affordable Rented provision more heavily weighted towards family-sized units). This would fully comply with the requirements of Policy BH5. Furthermore, it would comply with the threshold criteria set out in London Plan Policy H6, and would therefore be eligible for the fast track route. An early stage viability review would be required to comply with London Plan policy, if the development is not implemented within two years.
19. The proposal does not require a Financial Viability Assessment to comply with either Brent or London Plan policy requirements as it qualifies for the fast track route, and the provision of this level of affordable housing is considered to be a significant planning benefit. The applicant has chosen to provide the additional 86 homes for shared ownership, and the provision of affordable housing above and beyond the policy requirement also represents a planning benefit.
20. As noted above, the affordable rented units would be provided as London Affordable Rent and the

Shared Ownership units in line with the household income cap and eligibility criteria for intermediate products set out in the London Plan. These matters would be secured through the s106 agreement.

21. The scheme does not provide 1 in 4 of the homes as family sized (three bedrooms or more). To meet the requirements of Policy BH6 a total of 43 family sized homes would be required. In this case, 30 family sized homes are provided (accounting for around 17%). The proposal would result in an uplift of 9 family homes beyond those approved in the extant consent, out of a total of 49 additional homes within this proposal. The increase in family sized homes also represents less than 25 of the additional homes proposed beyond the extant consent. However, it is recognised that the proposed housing mix represents a balance between the competing policy priorities of providing industrial capacity and affordable housing. The family-sized units would be predominantly for London Affordable Rent (23 of the 54 LAR units) and this would respond to a specific local need for family-sized affordable housing. Furthermore, the current proposal seeks an uplift of 8 additional family sized homes within the LAR tenure compared to the consented scheme.
22. Overall, despite not fully complying with the requirements of Policy BH6, the proposal would deliver a number of significant planning benefits, both in terms of the affordable homes being proposed and the quantum of industrial floorspace provision on site, and these benefits are considered to outweigh the harm of not providing the required amount of family sized homes in this instance.

## **Design and appearance**

### Policy background

23. Policy DMP1 requires the scale, type and design of development to complement the locality, while Policy BE1 seeks the highest standards of urban design and the Brent Design Guide SPD1 provides further advice on general design principles. London Plan Policy D3 proposes a design-led approach to density and optimising the development potential of sites, and Policy D9 provides specific guidance on the location and form of tall buildings.
24. Brent's Policy BD2 defines a tall building as one that is more than 30m in height above ground level, and directs tall buildings to Tall Building Zones as shown on the policies map. The policy sets out that in Tall Building Zones heights should be consistent with the general building heights above ground level shown on the policies map, stepping down towards the Zone's edge. In all cases tall buildings must be shown to be positive additions to the skyline that would enhance the overall character of the area. They should be of exceptional design quality, consistent with London Plan policy requirements in showing how they positively address their visual, functional, environmental and cumulative impacts. This site is located within a Tall Building Zone, and site allocation BSWSA1 also sees the sites in this area as being suitable for tall buildings around Alperton Station, while stepping down towards boundaries with traditional two-storey housing.
25. The surrounding area is varied in character and the site is in an area of transition, between traditional two-storey housing to the west and northwest, and the larger scale buildings and mix of uses around Alperton Station to the east and south. The emerging street scene is characterised by a cluster of tall buildings near to the station, including Minavil House (maximum height of 26 stories, granted permission under 16/2129) and Alperton House (maximum height of 23 stories, granted permission under 18/4199), both currently under construction and located in close proximity to the application site, and permission for a development of up to 28 storeys on the former Alperton Bus Depot site at 330 Ealing Road was granted under 20/3914. Adjacent to the site to the northwest, a scheme of up to seven storeys at 1-8 Dowlings Parade has permission under reference 20/1151.
26. Bridgewater Road is also designated in the Local Plan as an intensification corridor, where building heights of up to five stories could be supported outside of the Tall Building Zone. Taken together with the emerging street scene centred around the Station, this designation could stimulate further changes in the character of the surrounding area and a more pronounced transition from traditional two-storey housing.

### Height, mass and bulk

27. The consented scheme consists of four elements: a three-storey building for industrial use on the street frontage (Block C); an eleven-storey residential point block on the northwestern side of the site (Block A); a 19-storey residential point block on the southeastern side (Block B); and a seven-storey residential block above podium level linking Blocks A and B at the rear of the site. The buildings

would be linked at first floor level by a podium garden for residential use and at ground floor which would provide residential cores and parking under the podium.

28. The proposed scheme would retain Block C on the street frontage but this element would be two storeys in height rather than three and the upper storey would extend across the footprint of the residential cores and parking area. As with the consented scheme, the floorspace would be designed to be as flexible as possible, including two goods lifts and minimum floor to ceiling height of 4.5m for the ground floor unit and 3.5m for the majority of the first floor units.
29. The two point blocks would be set back from the road frontage and would sit on top of Block C, of which the roof would provide a podium level garden for all of the residential homes. The podium garden would be screened by a full-height parapet continuing the architectural language of the base element. Block B would be 19 storeys in total, as in the consented scheme. Block A would be 13 storeys in height, compared to the 11-storey block in the consented scheme. The two blocks would be increased in width and depth compared to the consented scheme, with Block B moved further towards the southeastern boundary, and there would be no link block between them. The approx dimensions of the two schemes are compared in more detail in the table below.

	<b>Consented scheme</b>	<b>Proposed scheme</b>
Height of Block C	17m	11m – 15m
Height of Block A	41m	49m
Height of Block B	68m	68m
Width and depth of Block A	18.5m x 22m – 25m	21.5m x 22m – 25m
Width and depth of Block B	18.5m x 21.5m – 24.5m	21.5m x 28m – 31m
Block B distance to boundary	8.5m	5.5m

30. The increased height of Block A is one of the more significant changes proposed in terms of impact on street scene and character, with this building being more than twice the height of the partly seven-storey development at 1-8 Dowlings Parade and being the element of the proposal with the closest relationship to the traditional two-storey housing further along Bridgewater Road. However, even this element would be at a significant distance of 45m from the two-storey housing and the difference in height would be mediated by the seven-storey building on the adjoining site.
31. A townscape and visual impact assessment has been submitted, illustrating the impact of the proposal on eight representative local views within a study area of 500m which includes large scale industrial and commercial buildings and groups of terraced or semi-detached houses as well as areas of open space and the canal. The assessment compares existing and proposed views as well as cumulative views incorporating six other emerging developments in the area. There is one non-designated heritage asset within the study area, Alperton Station (a locally listed building). The conclusions are as follows:
32. RV1: Junction of Ealing Road and Atlip Road: This view is from the eastern pavement of Ealing Road, approx 250m to the northeast of the site, with Alperton Station, raised railway line above the road and the entrance to Alperton Community School visible in the foreground. The two point blocks would be visible behind the station and alongside the emerging development at the Alperton Bus Depot site but stepping down towards the background. Alperton Station would remain in the foreground and the proposal would have a moderate beneficial effect.
33. RV2: Bridgewater Road (south): This view is from the opposite side of Bridgewater Road approximately 80m east of the site, and shows the transition between residential areas to the right of the view and the industrial area of which the site forms a part. The emerging development on the Minavil House site can be seen in the background, alongside part of the existing 243 Ealing Road development. The view of unkempt industrial properties is considered to be of low value. The proposal would form part of a cluster of tall buildings centred around the junction of Ealing Road and Bridgewater Road and would have a moderate beneficial effect within this context.
34. RV3: Junction of Ealing Road and Bridgewater Road: This view is from approx 110m southeast of the site, and shows the existing buildings in the centre ground behind Alperton Bus Depot on the opposite

side of the road, with the site hoardings for the Alperton House development visible at the back of the pavement. The proposal would sit within a cluster of tall buildings in this view, would be less prominent than the Alperton House and Alperton Bus Depot developments in the foreground, and would provide a transition in height down towards the residential areas further north. It would have a moderate beneficial effect within this context.

35. RV4: Junction of Manor Farm Road and Burnside Crescent: This view along Manor Farm Road is from approx 230m southwest of the site. Part of the site is visible in the distance, and forms part of the low-value industrial townscape also seen on the south side of this road, in contrast to the groups of terraced housing on the north side. The proposal would form a backdrop to the terraced housing in this view, and other tall buildings within the emerging cluster would also be visible on the skyline, forming a view with a moderate beneficial effect.
36. RV5: Grand Union Canal towpath: This view is approx 230m to the southeast of the site, on a popular route for pedestrians and cyclists. The view is dominated by the waterway and riparian vegetation, and the existing buildings on the site are not visible due to the intervening built form. The proposal would be partially visible in the background, as part of a group of tall buildings in the background of the view, and would have a minor neutral effect.
37. RV6: Bridgewater Road (north): This view along Bridgewater Road is approx 285m to the northwest of the site, and shows the traditional low-rise residential character of this area. In the far background, the development on the Minavil House site is visible, as is the existing 14-storey tower block at 243 Ealing Road. The proposal would be seen as part of the background of this view, alongside other tall buildings within the emerging cluster, but would be partly screened by mature tree cover during summer. Within this context, the proposal is considered to have a minor beneficial effect.
38. RV7: One Tree Hill Recreation Ground: This view is from a footpath within One Tree Hill, approx 155m to the northwest of the site, which shows the railway lines in the centre ground and the existing Peppermint Heights building in the background. The view is framed by mature tree cover on both sides. The proposal would be partly screened by trees during the summer, and would contribute towards a skyline of new development in the far middle ground replacing the existing low value industrial buildings in this view, having a moderate beneficial effect overall.
39. RV8: Junction of Ealing Road and St James' Gardens: This view is from a typical residential area approx 310m to the northeast of the site and in close proximity to the Shri Vallabh Nidhi Mandir Temple (not visible within the view). In the distance, there are partial views of an 8-storey building at 185 Ealing Road (opposite Alperton Community School) and the emerging Minavil House development, which form a backdrop to the two-storey housing in the foreground. The proposal would be mostly screened by the existing built form, and would part of a wider backdrop of tall buildings in the distance of this view. It is considered to have a minor neutral impact in this context.
40. This assessment demonstrates that the proposal would have an acceptable impact in terms of close and longer distance views, particularly given the relative impact of the recent extant consent and other developments emerging within the area. The overall height and massing are appropriate for the site, forming a transitional element between the two storey semi-detached and terraced houses to the north and the core of the Tall Building Zone to the south.
41. Given that the intensification corridor designation could result in further changes to the character of the area, the increase in height compared to the recent extant consent is acceptable, subject to relationships with neighbouring properties being demonstrated to be acceptable and given the other planning benefits of the proposal in comparison to the consented scheme.

#### Site layout and relationship with the street

42. The ground floor of the building would provide an active frontage onto Bridgewater Road, consisting of a large commercial unit and a lounge for residents. The lounge area would enable residents within the building to meet and form a more cohesive community, and would activate the street frontage during the evenings and at other times when the industrial units are not in use. The residential entrances would be set back from the frontage, providing a more private domestic character, and the use of coloured pre-cast panels to highlight the entrances would create legibility and a strong sense of arrival for residents.
43. Externally, opportunities for high quality landscaping have been maximised both within the site and on

the adjoining public realm. The main vehicle route through the site would be a shared space with clay paving, and pedestrian routes to the residential entrances are demarcated, with landscaped buffers comprising small areas of herbaceous, perennial and tree planting or contrasting paving proposed to provide separation for pedestrians from vehicular traffic. Small landscaped areas would also be provided along the site frontage. The overall landscape strategy is considered to be high quality, with no part of the site left unresolved.

### Architectural detailing and materials

44. The residential and commercial elements of the scheme would have a shared architectural language, with the use of repeating window arrangements to create a strong rhythm and vertical emphasis to both elements. The ground floor elevations would be consistent across both commercial and residential elements, helping to ground the development within the street scene and further unify the two parts. Meanwhile, differences in window proportions and detailing would give separate definition and identity to the two elements.
45. The composition of the residential point blocks would be based on a double-storey grid in which alternate floors would be emphasised with vertical banding, and this approach makes the overall bulk of the building appear legible and proportionate in the street scene. The alternation of windows and recessed balconies helps to break up the facades and prevents these from appearing overly bulky and monotonous.
46. The residential entrances would be set back from the street to align with the location of the point blocks. They would be emphasised through design features such as the coloured concrete facades, to provide legibility and a sense of arrival for residents, and would be further enhanced by landscaping and external lighting. They would be accessed along dedicated routes within the shared surface service road, and would reflect inclusive design principles in terms of details such as level changes, door type and circulation space. The development would be tenure blind, with the same design quality and detail across both tenures.
47. The materials palette would be common to the residential and commercial elements of the scheme, and this would also help to link the two elements together visually and create a strong identity for the development. Light multi-colour brick is proposed as the main material and this, with precast concrete cream panels and banding, and metal window frames and balustrades in brown or dark beige, aims to provide durability, withstand weathering and sit comfortably within the surrounding street scene.
48. The use of materials is considered to successfully capture the aesthetic of the existing and emerging context and as such responds positively to the character of the surrounding area. Additional architectural detailing such as projected brick coursing and 'hit and miss' brickwork would add texture and visual interest to the elevations and create a sense of variation in scale. Further details of materials would be required by condition.

### Conclusion

49. Overall, the proposal would be of the same high quality of design as the consented scheme, but would provide a simpler and more logical arrangement that allows for increased industrial floorspace and better daylight and sunlight penetration to the podium garden. The overall height, bulk and massing are considered to be appropriate to the emerging street scene whilst also respecting the traditional suburban character nearby, and the layout and architectural detailing create an effective relationship with the street and high levels of visual interest.
50. The proposal would respond well to the constraints and opportunities of development in this area of transition between the dense urban fabric around Alperton Station and the more traditional housing to the northwest. The scheme is considered to lead the way in good urban design and consequently complies with Policy BD1 and the principles set out in SPD1.

### **Impact on heritage assets**

51. Section 16 of the NPPF ("Conserving and enhancing the historic environment") (paras. 184 to 202) advises Local Planning Authorities to recognise heritage assets as an "irreplaceable resource" and to "conserve them in a manner appropriate to their significance" (para.184). With regard to non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset (NPPF, para.197).

52. The visual impact on Alperton Station as a locally listed building (a non-designated heritage asset) has been considered as part of the townscape and visual impact assessment. The Station building is recognised for its architectural, historical and townscape significance owing to its status as one of the Piccadilly line stations designed by Charles Holden, who was architect to the London Underground. Drawing influence from contemporary European work in urban transport, Holden characterised each station as a 'brick box with a concrete lid' using brick, reinforced concrete and glass.
53. The two sites are approx. 100m apart, and separated by the railway tracks which run above ground at this point and provide a significant visual barrier separating the Station from buildings on the other side of the tracks. RV1 demonstrates that the Station would retain its significance within the Ealing Road streetscene, and that the proposal would form part of a group of taller buildings within its wider setting but would not be the most prominent within views of the Station. Although substantially taller than the Station building, the architecture of the proposed development is set away from the heritage asset and does not detract from its identified significant characteristics. It is considered that no harm would be caused to the Station as a result of the proposed development, which would appear as a visual backdrop to the setting of the Station.

### **Fire safety**

54. London Plan Policy D12 requires all new development to achieve high standards of fire safety. A fire statement was submitted in accordance with this policy, and sets out details of construction, means of escape, features to reduce the risk to life, access for fire service personnel, equipment and appliances, and the impact of potential future modifications. The statement is considered to satisfy the requirements of Policy D12.
55. The proposal is classified as a 'relevant building' under planning regulations introduced in 2021, which require a fire statement to be submitted in the form prescribed by the Secretary of State and introduce a statutory requirement to consult the Health and Safety Executive (HSE). This process is known as 'planning gateway one', and the proposal would be subject to further scrutiny before construction starts ('gateway two') and after completion ('gateway three'). These later stages are regulated by the Building Safety Act 2022.
56. Following the submission of a fire statement in the prescribed form, a number of amendments to the detailed layout of the scheme have been made in order to address concerns raised by the HSE during the gateway one process. These are summarised in the following paragraphs.
57. Relocation of residents' lounge from second floor of Block B to ground floor of Block C: In its original location, the residents' lounge would open out onto the podium external amenity space and so would function to some extent as an extension of that space but could be interpreted by residents as being primarily for the use of Block B residents. In its proposed location, the residents' lounge would provide an active frontage and a more public space for residents of both blocks to meet friends and visitors, and being adjacent to the concierge and associated facilities would also increase its functionality. Although this amendment would change the character of the residents' lounge and of the active frontage of the scheme overall, it is considered to be a moderately beneficial change.
58. Relocation of two residential homes from first floor to second floor of Block B, and consequent relocation of part of the commercial floorspace from ground floor to first floor. In their original location, these two homes would be isolated from the main residential development and surrounded by commercial floorspace and plant rooms. In their proposed location, these homes would be part of a residential core with other homes and would look out onto the podium amenity space. This amendment would change the character of these homes, and the impact is considered to be beneficial. The first floor, other than as required for plant and ancillary functions, would be wholly for commercial use, providing a potentially stronger identity for the commercial floorspace.
59. Escape route corridor provided from car park to exterior of building, adjacent to Block A. This amendment would not materially alter the layout, appearance or character of the development.
60. Protected lobbies created on all residential floors. This amendment would not materially alter the layout, appearance or character of the development.
61. Risers relocated, resulting in minor changes to internal layouts of homes. This amendment would not materially alter the layout, appearance or character of the development. All homes would continue to

meet minimum internal floorspace standards.

62. Block A roof enclosure redesigned to accommodate mechanical and electrical plant requirements and relocation of risers/smoke shafts. This amendment increases the size of the roof enclosure by 8sqm approx, and this has been accounted for in the calculation of residential amenity space.
63. Minor changes in the layout and configuration of ancillary spaces including cycle stores and plant rooms. These amendments would not alter the extent of active frontage or the layout of the commercial spaces and residential entrances, and are not considered to materially alter the proposal.
64. These amendments would reduce the quantum of industrial floorspace proposed from 2,382sqm to 2,228sqm, which as noted above would fall marginally below the amount sought in the site allocation for this site. However, it is considered that this concern is outweighed by the benefits of ensuring the development meets the highest standards of fire safety.
65. The HSE have been reconsulted and have confirmed that the revised scheme addresses all of its concerns satisfactorily. Further issues that would need to be addressed at the Gateway Two stage (Building Regulations approval) are highlighted in the HSE's response.

## **Relationship with neighbouring properties**

### Policy background

66. Any development will need to maintain adequate levels of privacy and amenity for existing residential properties, in line with the guidance set out in SPD1. The building should sit within a 30 degree line of existing habitable room windows and a 45 degree line of existing rear garden boundaries (although it should be noted in this case that the site does not directly adjoin any existing residential properties). Separation distances of 18m to windows and 9m to boundaries with adjoining properties or development sites should be maintained.
67. Where buildings would be within a 25 degree line of existing windows, the Building Research Establishment considers that levels of light to these windows could be adversely affected and recommends further analysis of the impacts. A more detailed assessment of daylight and sunlight impacts based on the BRE's Site Layout Planning for Daylight and Sunlight (BRE209) 2022 guidance is required where the 25 degree test is not met. This guidance supersedes the 2011 version, however the advice in relation to assessing the impact on neighbouring properties remains consistent with the earlier version.
68. The BRE Guidelines recommend two measures for daylight. Firstly, the Vertical Sky Component (VSC) assesses the proportion of visible sky and is measured from the centre of the main window. If this exceeds 27% or is at least 0.8 times its former value, residents are unlikely to notice a difference in the level of daylight. Secondly, the No Sky Contour or Daylight Distribution assesses the area of the room at desk height from which the sky can be seen. If this remains at least 0.8 times its former value, the room will appear to be adequately lit.
69. To assess impacts on sunlight to existing south-facing windows and amenity spaces, assessment of Annual Probable Sunlight Hours (APSH) is recommended. The guidance sets a target for windows of 25% of total APSH including 5% in winter months for windows, and for amenity spaces to receive at least two hours sunlight on 21 March and not less than 0.8 times their former value.
70. However, the BRE 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 2021 also supports a flexible approach to applying standards in order to make efficient use of sites.
71. The 2022 BRE Guidelines are not materially different from the 2011 Guidelines which they have superseded, in respect of the guidance provided for impacts on neighbouring properties. This application was made prior to the publication of the 2022 Guidelines and is based on the 2011 Guidelines. However, officers consider that the results are sufficiently robust given the similarity in the two versions of the guidance.

### Assessment of separation distances

72. The development would retain a separation distance of approx 5m from the southeastern boundary, which is with a UKPN substation serving domestic customers. The substation site is approx 20m in width and beyond this is the Alpertons Bus Depot site, currently being redeveloped under reference 20/3914. During the determination of 20/3914, it was reported in paragraph 72 of the Committee Report that UKPN had confirmed that the substation remains an active operational substation that is required for the future of their electricity network. Consequently Planning Committee considered that, whilst the proposed development would not retain a 9m distance to the boundary, this could be accepted in this case as the potential for the substation site to come forward for redevelopment was negligible. Planning Committee resolved to grant permission for that development on 28 April 2021, and the scheme is currently being built out. This further reduces the development potential of the substation site, which is not of sufficient width to provide an acceptable form of development in this location other than as part of a larger site. On this basis, it is considered that whilst the proposed development would not maintain a 9m separation distance to the boundary a closer distance can be accepted in this instance.
73. On the northwestern side, the first floor of the commercial floorspace would be approx 9m from the boundary with the adjoining site (1-2 Dowlings Parade) on the road frontage and 13m to the rear. This boundary is roughly L-shaped, with the rear of the site extending further to the northwest, and on this part of the site the lower of the two point blocks would be approx. 13m from the boundary, and thus exceeding the 9m separation distance from the neighbouring boundary as set out in SPD1. This relationship between the proposal and the adjoining site is not materially different to that of the recently consented scheme (which also has a solely commercial frontage but also has residential units facing this boundary on the first floor).
74. One front elevation window on each floor in Block A would partly face onto the angled part of the shared boundary, albeit obliquely, at a distance of only 7m. However, given the oblique relationship between the window and the boundary and the fact that only a small part of the window would face onto the boundary your officers consider there would be very limited scope for any overlooking between the two sites. Side-facing windows in these units would retain a distance of 13m to the boundary, however overlooking from the front-facing sections of their balconies could be of concern, and a condition requiring a suitable form of balcony screening on these sections is recommended. Otherwise, the proposal would maintain in excess of the required 9m separation distance from this boundary to allow the adjoining site to come forward in an acceptable form of development.
75. This adjoining site is also part of the proposed site allocation and has planning permission for a residential-led development under ref 20/1151. The design of this proposal responds to concerns regarding overlooking between the two sites, through measures such as angled windows and flank wall screens where habitable rooms rely on the shared boundary for outlook. Planning Committee resolved to grant permission for this scheme on 9 September 2020, following a similar resolution on the recently consented scheme on the application site on 24 June 2020. Consequently it is considered that the relationship between the two developments has been adequately considered through this process.

#### Daylight and sunlight assessment

76. A Daylight & Sunlight Report was submitted, comparing the impact of the proposal to the existing situation and to the recently consented scheme. A total of 994 neighbouring residential windows were analysed to understand the impact of the proposed development upon them, including the emerging developments on the Alpertons House (ref 18/4199) and Alpertons Bus Depot (ref 20/3914) sites and the extant consent at 1-2 Dowlings Parade (ref 20/1151), in addition to existing properties on Bridgewater Road.
77. It should be noted that Nos 1-19 Bridgewater Road (odd numbers) are two-storey terraced houses located to the southwest of the site across the road. As such they currently look onto the low-rise buildings of this and the adjoining undeveloped industrial sites and therefore have unusually high levels of existing VSC. No 2 is located to the northwest of the site, is also a two-storey terraced house, and is separated from the site by a public footpath and the site at 1-2 Dowlings Parade.
78. The results are summarised in the following paragraphs.
79. No 13 Bridgewater Road: five windows assessed, of which three would retain VSC values below 27% and slightly less than 0.8 times their former value (0.75-0.77 times). However, one of these windows already has a VSC level below 27%. None of the rooms served would be materially affected, retaining

well in excess of 0.8 times their former value of NSL. There are no south-facing windows directly facing the development that require testing for APSH. The consented scheme would not materially affect this property, as all windows would retain over 0.8 times their former value of VSC and all (except the window with an existing VSC below 27%) would retain a VSC of over 27%.

80. No 11 Bridgewater Road: seven windows assessed, all of which would experience a noticeable loss of VSC (0.5-0.75 times their former value and less than 27%). However three of these windows serve a porch and none of the rooms served would be materially affected, retaining well in excess of 0.8 times their former value of NSL. One porch window is south-facing and directly facing the development, and the assessment indicates that this would retain 8% of APSH compared to the existing 14%. For the consented scheme, only four windows were assessed for this property (the porch was not assessed), of which one would be materially affected by a fall in VSC to 22% (or 0.73 times its former value).
81. No 9 Bridgewater Road: eight windows assessed, of which six would retain VSC values below 27% and less than 0.8 times their former value (0.6-0.73 times and less than 27%). The living room would experience a reduction in NSL to 0.78 times its former value, slightly below the BRE target, although other rooms would not experience any loss of NSL. There are no south-facing windows directly facing the development that require testing for APSH. For the consented scheme, only four windows were assessed, all of which would retain a VSC of over 27% and so would not be materially affected
82. No 7 Bridgewater Road: five windows assessed, all of which would experience a noticeable loss of VSC (0.56-0.69 times their former value and less than 27%). However, none of the rooms served would be materially affected, retaining well in excess of 0.8 times their former value of NSL. There are no south-facing windows directly facing the development that require testing for APSH. For the consented scheme, three of the five windows would experience a noticeable loss (0.66- 0.75 times their former value) and the other two would retain VSC values of just over 27%.
83. No 5 Bridgewater Road: five windows assessed, of which three would experience a noticeable loss of VSC (0.62-0.66 times their former value and less than 27%) and the other two would see VSC levels fall to below 27% (although one of these has an existing VSC level of less than 27%). However none of the rooms served would be materially affected, retaining well in excess of 0.8 times their former value of NSL. There are no south-facing windows directly facing the development that require testing for APSH. For the consented scheme, three windows would experience a noticeable loss of VSC (0.73-0.74 times their former value and less than 27%).
84. No 3 Bridgewater Road: five windows assessed, all of which would experience a noticeable loss of VSC (0.47-0.65 times their former value and less than 27%), although two already have VSC levels below 27%. However none of the rooms served would be materially affected, retaining well in excess of 0.8 times their former value of NSL. There are no south-facing windows directly facing the development that require testing for APSH. For the consented scheme, all five windows would experience a noticeable loss (0.6-0.7 times their former value and less than 27%).
85. No 1 Bridgewater Road: nine windows assessed, six of which would experience a noticeable loss of VSC (0.27-0.72 times their former value and less than 27%), although five already have VSC levels below 27%. However none of the rooms served would be materially affected, retaining well in excess of 0.8 times their former value of NSL. The two south-facing windows directly facing the development would retain 0.17 times and 0.69 times their former value of APSH. For the consented scheme, seven windows would experience a noticeable loss of VSC (0.49-0.7 times their former value and less than 27%).
86. No 15 Bridgewater Road: seven windows assessed, three of which would experience a noticeable loss of VSC (0.49-0.75 times their former value and less than 27%), although all three already have VSC levels below 27%. However, all of these have existing VSC levels of below 27%. Two other windows would experience a fall in VSC to less than 27%, although these would still be over 0.8 times their former values. None of the rooms served would be materially affected, retaining well in excess of 0.8 times their former value of NSL. The two south-facing windows directly facing the development would retain 0.3 times and 0.59 times their former value of APSH. For the consented scheme, two windows would experience a noticeable loss of VSC (0.62-0.73 times their former value of VSC and less than 27%) although as noted above, both already have low VSC values.
87. No 17 Bridgewater Road: eight windows assessed, one of which would experience a noticeable loss of VSC (0.775 times its former value and less than 27%). None of the rooms served by these windows would be materially affected, retaining well in excess of 0.8 times their former value of NSL. Three of

the windows serve a porch, and none of these would be materially affected. There are no south-facing windows directly facing the development that require testing for APSH. For the consented scheme, five windows were assessed (excluding the porch), none of which would be materially affected.

88. No 19 Bridgewater Road: five windows assessed, none of which would experience a noticeable loss of VSC. None of the rooms served by these windows would be materially affected, retaining well in excess of 0.8 times their former value of NSL. There are no south-facing windows directly facing the development that require testing for APSH. The consented scheme would also not materially affect any of these windows.
89. No 2 Bridgewater Road: four windows assessed, none of which would experience a noticeable loss of VSC. None of the rooms served by these windows would be materially affected, retaining well in excess of 0.8 times their former value of NSL. There are no south-facing windows directly facing the development that require testing for APSH. The consented scheme would also not materially affect any of these windows.
90. Alperton House, Block B: 118 windows assessed, four of which would experience a noticeable loss of VSC (0.79-0.75 times their former value and less than 27%). However all of these windows have low existing VSC values (22%-24%). One other window would experience a fall in VSC to less than 27%, although this would still be over 0.8 times its former value. None of the rooms served by these windows would be materially affected, retaining well in excess of 0.8 times their former value of NSL. None of the 18 south-facing windows directly facing the development would experience any loss of APSH. The consented scheme would not materially affect any of these windows.
91. Alperton House, Block C: 175 windows assessed, 16 of which would experience a noticeable loss of VSC (0.7-0.79 times their former value and less than 27%). However all of these windows have very low existing VSC values. None of the rooms served by these windows would be materially affected, retaining well in excess of 0.8 times their former value of NSL. None of the 17 south-facing windows directly facing the development would experience any loss of APSH. The consented scheme would not materially affect any of these windows.
92. 330 Ealing Road (Alperton Bus Depot) Block C: 294 windows assessed, 93 of which would experience a noticeable loss of VSC (0.45-0.73 times their former value and less than 27%). However some of these windows have very low existing VSC values. 61 of the rooms served by these windows would be materially affected in terms of NSL, retaining 0.56-0.78 times their former value. None of the 65 south-facing windows tested would experience any loss of APSH. The planning application for this development (ref 20/3914) had not been submitted at the time of determining the consented scheme, and the pre-existing bus depot was not assessed as it was not in residential use.
93. 330 Ealing Road (Alperton Bus Depot) Block A: 329 windows assessed, 11 of which would experience a noticeable loss of VSC (0.56-0.79 times their former value and less than 27%). However some of these windows have very low existing VSC values. 14 of the rooms served by these windows would be materially affected in terms of NSL, retaining 0.66-0.79 times their former value. None of the 50 south-facing windows tested would experience any loss of APSH.
94. 1-2 Dowling Parade (note this assessment considers the consented scheme ref 20/1151, whereas the assessment for the recent extant consent considered the impact on the existing buildings on site): 61 windows assessed, 40 of which would experience a noticeable loss of VSC (0.37 -0.77 times their former value and less than 27%). However some of these windows have very low existing VSC values. Seven of the rooms served by these windows would be materially affected in terms of NSL, retaining 0.48-0.5 times their former value. Of the 38 south-facing windows tested, six would fail to meet the BRE target for APSH and four would not meet the target for WPSH (although three of these reflect existing below target values).
95. Overall, 784 of the 994 windows assessed (79%) would continue to comply with BRE targets for VSC. In comparison, 557 neighbouring windows were assessed for the recently consented scheme, of which 532, or 96%, would comply. As noted above, this assessment did not include the more recent Alperton Bus Depot scheme. However, the assessment undertaken for the current proposal has tested windows in this scheme against both the current proposal and the consented scheme, and finds that 878 (88%) of the 994 windows tested overall would comply with BRE targets under the consented scheme. The number of windows experiencing a further reduction of more than 2% would be relatively low (98 windows, or 9.8% of the total), which means that the vast majority would

experience similar impacts to those caused by the consented scheme. Most of the windows experiencing a greater than 2% change would be in Block C of the consented development at 330 Ealing Road.

96. Compliance with the BRE target for NSL would be achieved for 86% of the rooms assessed (compared to 97% for the consented scheme). Other than one room in 9 Bridgewater Road, which marginally fails against the NSL target, these rooms would all be in the consented developments at 1-2 Dowlings Parade and 330 Ealing Road.
97. In terms of overshadowing and loss of sunlight, 95% of windows tested comply with the BRE targets, which is the same proportion as achieved by the consented scheme.
98. The amenity area associated with Alperton Community School has been assessed for the number of sunlight hours on ground, in line with the BRE guidance. This area would retain more than 2 hours of sun on 21 March following implementation of the proposal, and would continue to comply with the BRE target values. The impact would not be materially different to that of the consented scheme

## Conclusion

99. Adequate separation distances would be retained to allow neighbouring development sites to come forward in an appropriate manner. The impacts on daylight and sunlight to neighbouring properties would be minimal given the emerging high density character of the area and the scale of the development. It is important to note that the NPPF paragraph 123 encourages a flexible approach to applying guidance on daylight and sunlight where this helps to make efficient use of a site to deliver new housing, whilst the wider benefits of a scheme providing 100% affordable housing are also considered to outweigh any concerns in this respect. The proposal is considered to establish an acceptable relationship with neighbouring properties and development sites.

## **Residential living standards**

### Policy background

100. All development is required to comply with standards set out in Policy D6 of the London Plan, including minimum space standards. Policy D7 requires 90% of units to meet Building Regulations M4(2) 'accessible and adaptable homes' standards and 10% to meet M4(3) 'wheelchair accessible homes' standards.
101. Brent Policy BH13 sets out that all new dwellings will be required to have external amenity space of a sufficient size and type to satisfy its proposed residents needs. This is normally expected to be 50sqm per home for family housing (3 bedrooms or more) situated at ground floor level and 20sqm for all other housing. Minimum standards for private amenity space such as balconies are also set out in London Plan Policy D6.
102. In addition, London Plan Policy S4 requires play and recreation facilities to be provided based on the expected child yield, including doorstep play for younger children and off-site provision where necessary for older children.
103. The BRE Guidelines published in 2011 recommend an Average Daylight Factor (ADF) of 2% for kitchens, 1.5% for living rooms and 1% for bedrooms, although 1.5% is generally used for combined living spaces. Standards for daylight distribution and sunlight, including sunlight to amenity spaces, are also recommended.
104. The 2011 Guidelines were recently superseded by 2022 Guidelines. These are not based on Average Daylight Factor, as the associated British Standard is now obsolete. They use a more complex modelling methodology that takes into account factors such as weather, time of day and window orientation. The assessment of sunlight has also altered, with the new target being a minimum of 1.5 hours of sunlight on 21 March.
105. As this application was made prior to the publication of the 2022 Guidelines, the assessment carried out was based on the 2011 Guidelines. However, the applicants have advised that the overall quality of daylight and sunlight would remain the same under the new assessment methodology, with some levels being higher and others being lower.

## Internal layout

106. All of the units would meet or exceed the minimum internal space standards, with efficient and convenient internal layouts and living rooms designed to face south where possible to take advantage of sunlight. The number of dual aspect units has been maximised through the design process to comprise 64% of the total. Whilst this is slightly less than the 76% dual aspect units provided in the consented scheme, the single aspect units would be mainly 1beds and a small number of 2beds, and would face northwest or southeast so as to avoid the drawbacks of solely north- or south-facing units. The cores would be efficiently laid out and floor to ceiling heights are proposed to be at least 2.5m. Internally, the layouts are broadly well-planned and comply with or exceed minimum space standards, in accordance with Policy D6.
107. Eighteen of the units would be very generously sized and are indicated as being wheelchair accessible to M4(3) standards (accounting for over 10% of the proposed homes). These would be split between the two tenures with 7 of the LAR homes designed as wheelchair accessible under M4(3) from the outset and 11 of the shared ownership homes designed as wheelchair adaptable under M4(3). All of the accessible homes would be located on levels 2 to 5. Detailed layouts of M4(3) units have been provided in the Design & Access Statement, and compliance with M4(2) and M4(3) standards would be required by condition. Communal circulation spaces and routes to bin stores have also been designed to incorporate inclusive access.
108. A Daylight & Sunlight Report has been submitted in support of the application, and this assesses the daylight and sunlight available to the proposed units. The report was updated in March 2022 to reflect the revised layout in which two residential units were relocated from the first to the second floor. This assesses 493 rooms for daylight and 179 living room / kitchen / dining areas for sunlight. It concludes that 262 rooms (53%) would meet or exceed the minimum recommended levels for Average Daylight Factor (ADF), while 406 rooms (82%) would exceed the BRE recommendation for No-Sky Line and 135 living rooms (75%) would meet or exceed the targets for sunlight. Although the daylight and sunlight provision is not as good as in the consented scheme (where only two of 28 rooms tested would fail to meet BRE targets), this is to some extent inevitable given the increased bulk of the blocks and increased height of Block A, and consequently is balanced out by the planning benefits associated with the uplift in the number of affordable homes provided. Many of the rooms falling short against the ADF targets would only marginally fail, and overall it is considered that the proposal would offer adequate daylight and sunlight amenity for future occupiers.
109. Separation distances of 19m would be maintained between directly facing habitable room windows, to ensure that future residents would have adequate privacy and protection from overlooking. All balconies would be recessed, and this would prevent overlooking between balconies without the need for additional balcony screening other than in a small number of cases. Defensible space of 1.5m depth is indicated on the plans to provide privacy for units with habitable room windows and private terraces adjoining the podium garden, and further details of this space would be secured as part of the detailed landscaping scheme required by condition.

## External amenity space

110. The proposal has been assessed against the standards set out in Brent Policy BH13 and London Plan Policy D6 as follows. There are no family-sized units at ground floor level proposed within the scheme and therefore the policy standard of 20sqm per unit would apply to all 173 units, giving an overall policy requirement of 3,460sqm..
111. All units would have recessed balconies providing between 5.1sqm and 9sqm of private balcony space. In terms of compliance with Policy D6, all homes would have access to the specified amount of private amenity space (5sqm for 1- or 2-person homes and 1 additional sqm for each additional person). Detailed amenity space schedules have been provided, confirming the amount of private space for each unit and total private space.
112. The proposal also includes a second floor podium garden of 1,088sqm which would be accessible to residents of both blocks, a roof terrace of 383sqm on top of the 13-storey Block A, which would be accessible to residents of that block, and a roof terrace of 184sqm on top of the 19-storey Block B, which would be accessible to residents of that block. These spaces would provide communal amenity space of 1,655sqm in total, to compensate for the shortfall in private amenity space against the 20sqm standard set out in Policy BH13. Assuming the use of the podium garden is shared between the blocks on a pro-rata basis according to the number of habitable rooms, the resultant overall provision

is summarised in the following table:

	Block A (sqm)	Block B (sqm)
Total private balcony space	435.2	808.1
Policy requirement	1,080 (= 54 x 20)	2,380 (= 119 x 20)
Shortfall against policy	644.8	1,551.9
Pro-rata share of podium	380.8	708.9
Block roof terrace	383	184
Total communal space	763.8	892.9
Residual shortfall	No shortfall – provision exceeds policy requirement	659.05

113. An adequate amount of amenity space would be provided for residents of the London Affordable Rent units in Block A, which also provides the majority of the family-sized homes within the scheme. Although there would be a shortfall of 659.05sqm for residents of the shared ownership units in Block B (approx 5.5sqm per unit), this would be broadly comparable to the shortfalls accepted on other high-density developments in the area. In this respect, the proposal is comparable to the consented scheme, which would have a shortfall of approx 6sqm per home in Block B and also a shortfall of approx 1sqm per home in Block A.
114. Sunlight to the proposed podium garden amenity space has been assessed in accordance with the BRE 2022 guidance, which (as with the 2011 guidance) recommends that at least half of a proposed amenity space should receive at least two hours of sunlight on 21 March. The assessment found that 97% of the podium would achieve this target, compared to 66.5% in the consented scheme. This reflects the improved design of the current proposal, as the parapet wall to the podium would have regular openings and would be significantly lower in height than the consented three-storey frontage block, so allowing more sunlight penetration.
115. The Landscape Strategy submitted describes how the communal amenity spaces would be attractively landscaped as densely planted gardens, each including play spaces to provide a diverse range of play elements and allowing for passive surveillance of play areas, and incorporating a strategy for external lighting across the site. The GLA policy requirement for play space is 940sqm in this case. The total provision of 936sqm of on-site play space would be broken down into spaces for different age groups (0-3, 4-10, 11-15 and 16-17 year olds), of which 697sqm would be accessible to all residents on the podium garden and the remainder would be available for London Affordable Rent residents on the roof terrace of Block B. There is a small shortfall in provision for the 16-17 year age group, however One Tree Hill Recreation Ground is easily accessible within 100m of the site and provides a range of play options for all ages. Further details of landscaping, including play equipment and other external furniture, would be required as part of the landscaping condition.
116. Overall, the amenity space provision would be of high quality and offer a variety of experiences. It is considered that the shortfall against the Policy BH13 and S4 standards could be mitigated by a financial contribution of £50,000 towards improvements to One Tree Hill Recreation Ground (compared to a £35,000 contribution secured for the consented scheme). This would help to provide enhanced outdoor recreation facilities to support the increased demand resulting from the development, and would accord with Policy S4, which encourages off-site play facilities for older children.

## Conclusion

117. Whilst the scheme would result in a shortfall in external amenity space within the application site as set out above, taking into consideration the quality of the communal amenity spaces within the application and the site's location in close proximity to One Tree Hill Recreation Ground, that the residents would have access to external amenity space of sufficient size and type to meet the needs of the proposed residents. Overall, the scheme would still comply with requirements of Policy BH13, despite not achieving 20sqm of private external amenity space per home. Notwithstanding the small shortfall in the amount of amenity space provided in comparison to policy standards, the proposal

would provide a high standard of residential accommodation overall, in terms of both internal floorspace and external amenity space, and is strongly supported on this basis.

## **Sustainability and energy**

### Policy background

118. All major developments are required to achieve zero carbon standards including a 35% reduction on the Building Regulations 2013 Target Emission Rates achieved on-site, in accordance with the energy hierarchy set out in London Plan Policy SI2. An Energy Assessment is required, setting out how these standards are to be achieved and identifying a financial contribution to Brent's carbon-offsetting fund to compensate for residual carbon emissions. Ongoing monitoring and reporting of energy performance is also required under the 'Be Seen' part of this policy, and a whole lifecycle carbon assessment is required for applications referable to the Mayor.
119. On 15 June 2022, national building regulations were updated to enhance energy performance standards for new buildings through publication of the new Part L 2021. The Mayor of London's Energy Assessment Guidance was updated at the same time to reflect the new regulations, however the accompanying software is not yet available and the GLA advises applicants to continue to use the 2013 methodology at present. The current proposal was submitted prior to the introduction of the new regulations and so has been assessed against the 2013 benchmark by Brent officers and the GLA.
120. Planning applications for major development are required to be supported by a Sustainability Statement in accordance with Policy BSU11, 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. Major commercial floorspace is required to achieve a BREEAM Excellent rating and this also needs to be appropriately evidenced.
121. An overheating assessment is also required, to assess and mitigate the risk of high temperatures in residential units in accordance with Policy SI4 and London Plan Policy SI7 also requires a circular economy statement for applications referable to the Mayor.

### Assessment of proposal

122. The proposal is supported by a Sustainability and Energy Statement, which sets out in detail the measures proposed to achieve the policy targets. These include a thermally-efficient building envelope reflecting passive design principles, together with efficient lighting and heat recovery ventilation, resulting in energy efficiency savings of 17.52% for the residential elements and 29.91% for the commercial elements. The use of air source heat pumps, together with photovoltaic panels on the roof of Block B, would bring the total on-site carbon reduction for the residential element up to 67% and for the commercial element to 49%.
123. Based on these details, the proposal would exceed the policy target for both residential and commercial floorspace reductions on-site, and would also exceed the reductions forecast for the recent extant consent (which achieved a 64.4% reduction for residential and 41.7% for commercial). A financial contribution to Brent's carbon offsetting fund has not been identified in the document, however officers estimate this to be £194,085, based on a price of £95 per tonne of carbon. The contribution would be secured through the s106 agreement, together with revised Energy Statements at detailed design and post-completion stages.
124. The Council's Energy & Sustainability Manager has commented that, although neighbouring sites in Alperton could link together into a wider heat network, emerging developments so far have their own communal systems. Without a local heat source, it can be challenging to find a cost effective system that would be preferable to the proposed installation. However, the capacity to connect to district heat networks in the future would be required to be demonstrated as a condition.
125. The Statement includes a BREEAM Pre-Assessment, which sets out measures that would be taken to achieve an Excellent rating. These would include water efficiency measures for the industrial units. A Post-Completion Certificate would be secured as a condition, to ensure that a BREEAM Excellent rating is delivered in the completed development.
126. The Statement also includes information to support the 'Be Seen' requirement, and ongoing

monitoring and reporting would be secured through the s106 agreement. A whole lifecycle and circular economy assessment is included, using a proprietary software to assess the impacts of product choice, demolition, construction, use and end of life stages, and makes some observations on minimising the embodied carbon in construction materials. A post-completion report on circular economy performance and recycling and waste reporting would be secured by condition.

127. An overheating assessment has been submitted separately. This demonstrates that all habitable rooms and communal areas would achieve the recommended thermal comfort levels.
128. The GLA have requested further detailed information in relation to a number of technical issues, and these matters are being addressed with the GLA prior to the Stage 2 referral.

### **Impacts on microclimate and reception of TV and radio services**

129. London Plan Policies D3, D8 and D9 emphasise the importance of the local microclimate created by new development involving tall buildings, in particular the need to ensure comfortable wind conditions. In accordance with these policies, a Wind Microclimate Assessment is required. A survey of the predicted impacts of the development on the TV and radio reception of neighbouring properties is also required, due to the height and scale of the development, including FM radio and digital terrestrial and satellite television, together with any mitigation measures recommended. These measures would be secured under the s106 agreement.
130. The Wind Microclimate Assessment uses the Lawson Comfort Criteria, which is the industry standard defining how an average pedestrian would react to different wind levels. Wind speeds are categorised as being suitable for either sitting, standing, strolling or walking, or as uncomfortable for most activities. Developments should aim to provide at least strolling conditions along pedestrian thoroughfares, standing conditions at main entrances, drop off areas, taxi ranks and bus stops, sitting conditions at outdoor seating areas in the summer, and standing conditions in large public amenity spaces in the summer, with sitting conditions at designated seating locations. Finally, sitting or standing conditions should be achieved in summer on balconies and private amenity spaces – providing sitting conditions in summer would generally ensure that standing conditions could be maintained in winter. Strong wind thresholds requiring mitigation measures are also defined.
131. A wind microclimate study was carried out, to determine if wind comfort and safety conditions would be suitable for pedestrian activities at the site and its surroundings. This study modelled wind speeds at locations including thoroughfares, entrances, bus stops, railway platforms, ground level amenity spaces and balconies within the site. It found that wind conditions with the proposed development and nearby schemes in situ would largely be suitable for the intended pedestrian uses. Some locations on the podium and roof terraces would have conditions that were windier than suitable for the proposed use, however the proposed landscaping scheme would improve these conditions sufficiently other than at two locations (the bin store entrance to Block A and an area of podium space). Further mitigation measures have been recommended to ensure suitable wind conditions at these two locations. These measures comprise the removal of two proposed trees adjacent to the bin store entrance, which wind tunnel testing suggests would direct a larger volume of air past this entrance, and the addition of a belt of 1m high shrub planting on the podium. These measures would be secured by condition as part of the landscaping scheme. Whilst the number of proposed replacement trees would be reduced by two, it would still represent a significant net increase on the existing site and is considered acceptable on this basis.
132. A survey of predicted impacts from the development on TV and radio reception to neighbouring properties was submitted, including FM radio and digital terrestrial and satellite television. Terrestrial signals within 150m to the northwest of the site could be affected, but this could be mitigated by measures such as repositioning or enhancing aerials. No satellite receivers would be affected and the development is considered unlikely to impact on FM radio broadcasts. A post-development survey and any mitigation measures required would be secured through the s106 agreement.

### **Environmental health considerations**

#### Air quality

133. The site is within an air quality management area and an air quality assessment has been submitted.
134. Environmental health officers have reviewed the assessment, and consider it to be acceptable. The

development would be air quality neutral and would not impact on air quality in the area, and new residents would not be adversely affected by air quality levels. There is no requirement for air quality mitigation measures to be integrated within the development, other than measures recommended during the construction phase. The proposal therefore complies with London Plan Policy SI1, and no conditions are required.

135. Brent's Local Plan Policy BSUI2 requires major developments in Growth Areas to be Air Quality Positive. The assessment does not cover this issue and further information has been requested from the applicants, and will be reported on in the Supplementary Agenda.

#### Noise and vibration

136. In accordance with Policy D13 of the London Plan, an assessment of noise and vibration is required. This 'Agent of Change' policy seeks to ensure that redevelopment of industrial sites to include residential uses provides acceptable standards of residential accommodation but does not prejudice the continued operation of neighbouring industrial sites.
137. A Noise and Vibration Report was submitted with the planning application. The assessment identifies noise sensitive properties nearby, and surveys potential noise sources for both existing and future residents in the area, including road and railway noise, operation of the bus depot and other commercial businesses nearby. Mitigation measures are proposed to achieve acceptable noise levels as specified by British Standards.
138. Environmental Health have been consulted and confirm that the assessment complies with relevant standards and is acceptable, subject to the recommended mitigation measures being implemented and adequate sound insulation being provided. These matters would be secured by condition.

#### Contaminated land

139. Environmental Health officers have reviewed the site investigation report submitted and agree with its recommendations for further sampling and testing after demolition of the existing buildings. This would be secured by condition, together with any necessary remediation measures.

#### Construction process

140. A condition is recommended, to secure the submission of a Construction Method Statement prior to commencement, to control dust, noise and other nuisance impacts of the construction process.

#### **Flood risk and drainage**

141. The site is within a Flood Zone 1 for surface water and fluvial flooding and is not in a critical drainage area, but is susceptible to groundwater flooding, according to the West London Strategic Flood Risk Assessment. London Plan Policy SI13 and Brent Policy BSUI4 require sustainable drainage measures on major development sites.
142. A Flood Risk Assessment and Drainage Strategy has been submitted. Blue roofs are proposed to collect surface water from the roofs and podium level within a surface water attenuation layer. The blue roofs would provide at least 135m<sup>3</sup> of attenuation, with total discharge restricted to 15 l/s for storm events up to and including 1 in 100 years with a 40% allowance made for future climate change, which is a significant improvement to the current situation with 86.5l/s for storm events in 1 to 100 years.
143. Water butts would be located at the base of some rainwater downpipes to retain water for irrigation purposes in periods of dry summer weather. Permeable paving and soft landscaping including intensive and extensive green roofs are also proposed on the podium and roof terraces to help control the flow and volume of water runoff and provide water quality treatment. However, due to the extent of existing drainage, proposed drainage and proposed incoming services, permeable paving is not considered suitable for the ground level hard surfacing. The overall reduction in discharge rates for the whole site would reduce by up to 49% for storm events in 1 in 100 years.
144. The Local Lead Flood Authority (LLFA) notes that the strategy offers a betterment compared to the existing situation, and considers it to be acceptable and appropriate for the proposed development. The GLA also consider that it complies with London Plan policies.

## Trees and biodiversity

145. Trees are a material planning consideration in any planning application, and Brent's Local Plan Policy BGI2 requires major developments to make provision for planting and retention of trees on site. In this case, an Arboricultural Impact Assessment has been submitted which identifies three Category C trees and two Category C tree groups that could be affected by the development (these include two trees along the road frontage, one tree on the southeastern boundary and two tree groups along the northeastern boundary with the railway embankment).
146. The tree on the southeastern boundary (a Category C Ash) would be removed as a result of the development, however this loss would be compensated by replacement planting. The landscaping plans indicate that eleven trees would be planted at ground level across the site, in addition to small ornamental trees on the podium and roof terraces. As noted under 'Impacts on microclimate and reception of TV and radio services' above, two of these trees would need to be removed from the scheme to provide acceptable wind conditions at the bin store entrance to Block A. However, the planting of nine replacement trees at ground level would still be more than adequate compensation for the loss of one tree.
147. Measures for protective fencing during construction have been set out, and these measures are considered to be adequate and appropriate given the low arboricultural value of the trees concerned, however a s106 obligation is recommended to require a financial contribution to the replacement of any street trees that may need to be removed as a result of construction works.
148. The adjacent railway line embankments are also part of a designated wildlife corridor protected by Brent's Policy BGI1. This policy also requires new development to achieve a net gain in biodiversity on site. To assess potential biodiversity impacts, the application has been supported by an Ecological Appraisal and a Biodiversity Net Gain Assessment Report.
149. The Appraisal summarises the results from a desk study, extended phase 1 habitat survey, reptile survey, inspections of existing buildings for potential to support roosting bats and bat emergence survey. It concludes that there are no statutory designated sites near the proposal site, and that the nearest Site of Importance for Nature Conservation (SINC) would not be directly affected as it is approximately 30m north of the site at One Tree Hill. No areas of ancient woodland were identified near the site, and no Habitats of Principal Importance within close proximity such that they would be affected by the development. The buildings surveyed on site were found to have low or negligible potential for bat roosting, and no bats or evidence of bats were recorded during an emergence survey conducted in August 2021. There is some suitable habitat on site for reptiles such as slow worms and these would be protected under other legislation. No protected species were found, however breeding birds and hedgehogs could be present within the site owing to the suitable habitats present. Precautionary mitigation measures are recommended to minimise any impacts on these, and compliance with these would be secured by condition.
150. Biodiversity enhancements are proposed as part of the landscaping scheme, including planting of native shrubs and four native multi-stemmed trees on the rear boundary with the railway embankment, which would provide a connection with the existing wildlife corridor and would help to support the existing ecological value of this corridor. Planting across the site and the use of blue roofs would also contribute towards biodiversity. Using the Biodiversity Metric established by Natural England, the biodiversity value of the site would increase from 0.12 habitat units to 0.25 (an increase of over 100%). The consented scheme was not assessed for biodiversity net gain, as this was not an adopted policy requirement at the time of determination.
151. Subject to compliance with the recommendations of the documents submitted, the proposal is considered to be acceptable in terms of its impact on trees and biodiversity and in compliance with Policies BGI1 and BGI2.

## Urban greening

152. London Plan Policy G5 and Brent's Policy BGI1 encourage development proposals to embed urban greening as a fundamental element of site and building design, and require detailed information on the development's urban greening factor to be submitted as part of major planning applications.
153. The Urban Greening Factor for the proposal has been calculated in accordance with draft Policy G5,

which recommends a target score of 0.4 for predominantly residential developments. The proposal would achieve a score of 0.4 and would meet the policy target. This compares well to the consented scheme, which achieved a score of 0.35, although urban greening was not an adopted policy requirement at that time. Furthermore the proposal would provide a significant uplift in greening and would utilise greening measures including green roofs, flower-rich perennial planting, trees and permeable paving. Therefore, it is considered that the proposal maximises urban greening provision and the level of green cover is acceptable.

### **Transport considerations**

154. Bridgewater Road is a London distributor road and a bus route with two lanes in each direction. There is a roundabout junction with Manor Farm Road on the site frontage. On-street parking on Bridgewater Road is prohibited from 8am to 6.30pm on Mondays to Saturdays and loading is prohibited during weekday peak hours. The nearby Burnside Road is classified as being heavily parked at night.
155. Alperton Station is approx 270m to the east of the site, and is served by the Piccadilly Line. The site is served by seven bus routes, with the nearest stops located on Bridgewater Road. The PTAL rating is 4 (good). The local cycle network includes on and off-street cycle routes and an off-street cycle route along the south side of Grand Union Canal. Recent pedestrian improvements in the vicinity of the site include the introduction of a new pedestrian crossing in Ealing Road and upgraded pedestrian crossing facilities in Bridgewater Road.

### Access

156. As with the consented scheme, the proposal includes a one-way service road running along the sides of the building and through an undercroft at the rear which also provides access to undercroft parking. The service road would have a minimum width of 4.1m and a headroom of 4.5m beneath the gated undercroft to provide suitable clearance for delivery and refuse vehicles. Tracking diagrams have been provided to show that 10m refuse vehicles and 8m box vans could negotiate the entire route around the site, including the tight right-angle bends. The same applies to fire appliances, giving them full access to the building perimeter.
157. The surfacing of the service road to either side of the building and the adjacent footways through the site are proposed to comprise block pavers, providing a shared surface for vehicles, cyclists and pedestrians. Contrasting coloured blocks would be used to delineate loading bays, and a tarmac surface would be used within the undercroft. A number of raised planters with trees and integral seating are proposed alongside the service road to improve its appearance and provide resting areas for pedestrians, as well as to help define the partially segregated pedestrian routes to the residential block entrances with the help of bollards. Each of the residential entrances would also provide an exit at the rear into the undercroft parking area. Pedestrian access to the workspace block would be taken directly from the Bridgewater Road frontage. Further details of external lighting would be secured under the landscaping condition.
158. The one-way arrangement of the service road has been supported by your transport officers, in particular because it removes any need to accommodate right-turning movements into and out of Bridgewater Road. By bringing all vehicular traffic onto the site to the east of the Bridgewater Road/Manor Farm Road roundabout and out of the site to the west of the roundabout, traffic would be able to turn left-only into and out of the site and use the roundabout to perform any necessary U-turns. Transport for London have welcomed the left-only arrangement as being consistent with Vision Zero objectives and the Healthy Streets approach.
159. The proposal would also provide a newly resurfaced 2.6m wide footway along the Bridgewater Road frontage, pushed back partly into the site to allow the existing grass verge along the frontage to be extended along the whole length of the site. This has been supported by transport officers, and also supports Transport for London's Vision Zero and Healthy Streets approach.
160. Land from the site would need to be dedicated as highway through a Section 38 Agreement to ensure the adoption of the whole width of the new footway. The precise route of the footway in the southeastern corner of the site adjoining the site access would also need to be more clearly defined to ensure it links seamlessly with the existing footway on Bridgewater Road to the east. Highway works would also be needed to reduce the width of the existing site access from 16.5m to 6.7m and, to complement this arrangement, to close up the existing gap in the central island in front of the site

entrance. These matters would be secured through the s106 agreement.

### Parking provision

161. 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, and Policy T6.1 sets out maximum parking allowances for residential developments. Local Plan Policy BT2 also encourages car free development where a Controlled Parking Zone is in operation or can be achieved.
162. Policy T6.1 requires disabled parking to be provided at the outset for 3% of residential units, which would give a requirement for six spaces. The proposal would be car-free, except for ten disabled parking spaces provided in an undercroft and accessed via the one-way service road. With one space allocated to the commercial element, nine spaces would be provided for residents, equating to 5% of the units. Whilst this exceeds the 3% disabled residential parking required from the outset under London Plan Policy T6.1, the proposal has not demonstrated how an additional 7% disabled parking could be provided for future resident's use or that adequate disabled parking would be provided for the industrial floorspace. To mitigate against the potential impact on public transport services, Transport for London have requested a financial contribution of £218,845 towards delivery of step free access at Alperton Station (the consented scheme secured a contribution of £25,000, although Transport for London had initially requested a sum of £208,000). This is under discussion with the applicant and the agreed amount would be secured through the s106 agreement.
163. Of the proposed spaces, it is confirmed in the applicants' Transport Assessment that four spaces would be provided with electric vehicle charging points at the outset, with the remainder having passive provision. This provision would be secured by condition, together with parking management measures to ensure that parking spaces are allocated in line with London Plan Policy T6.1 and to prevent informal parking around the site.
164. Overspill parking onto surrounding roads within the wider area (which is already heavily parked) would be a concern unless suitable mitigation is applied. To this end, given the site location within a Housing Zone and Growth Area, where other nearby developments have recently been approved with limited levels of off-street parking, there is likely to be increasing demand for a Controlled Parking Zone in the area to address parking problems (as proposed in the Alperton Housing Zone Transport Assessment).
165. Introducing a CPZ would allow the right of future residents to park within this area to be restricted by the Council, retaining on-street parking capacity for existing residents. This would mitigate parking concerns arising from the proposal. These parking permit restrictions would be secured through the s106 agreement, in addition to a financial contribution of £86,000 towards the costs of implementing a CPZ in the area. In general, by minimising new vehicle traffic and creating an expectation that new residents would use other modes of travel, a car free development would contribute towards the Council's wider aims of encouraging sustainable travel choices, as set out in Policy BT1.
166. Car Clubs are operating from nearby Atlip Road and 243 Ealing Road. To help to promote these, the applicant has confirmed in their Travel Plan that they would be willing to fund membership of a Car Club to incoming residents for three years, and this would also be secured through the s106 agreement.

### Cycle parking

167. London Plan Policy T5 requires the provision of 1.5 cycle parking spaces per 1bed flat and two spaces for larger flats, giving a total requirement for 317 secure residential spaces. A further five short-stay visitor spaces are also required. For the workspace, at least 17 long-term spaces are required, and five short-stay spaces.
168. Five cycle storage rooms for residents are proposed at ground floor level, with a total capacity for 319 cycles on a mixture of two-tier racks and 'Sheffield' stands. A further storeroom for 24 cycles for the workspace, along with an identified space at first floor level for sanitary facilities to provide two showers, is also proposed. All access routes to the cycle parking meet the recommended standards, and compliance with London Cycling Design Standards would be required by condition. For visitors, the proposed provision of seven external 'Sheffield' stands along the service road around the perimeter of the building exceeds the required standards.

## Servicing

169. Three bin stores for the commercial and residential units are proposed around the edge of the building, fronting the proposed service road to allow easy access for collection. The capacity shown for the residential stores (36 Eurobins and 15 wheeled bins) is sufficient to meet residential storage standards.
170. Under the standards set out in Appendix 6 of Brent's Local Plan, the workspace would need servicing by 8m rigid vehicles. A loading bay (3m x 8m) has been indicated on the proposed service road at the southeastern end of the building to satisfy this standard, with nearby goods lifts to access the first floor.
171. A Delivery & Servicing Plan has also been submitted and although this does not propose any practical measures to manage delivery movements to the site, transport officers consider that the provisions are broadly acceptable due to the scale of the proposal and the availability of off-street servicing space. A more detailed plan would be secured by condition.

## Transport Assessment

172. A Transport Assessment has been submitted with the application, to consider likely future trips to and from the site. For the residential units, the number of trips has been based upon surveys of six other similar residential developments in outer London, whilst for the employment space, the number of trips has been estimated based upon average staff occupancy of 20 staff per sqm (i.e. 95 staff), with 50% of staff estimated to arrive and depart during peak hours. The modal share outputs have then been adjusted to reflect the fact that very limited parking would be provided on the site.
173. As a result of the assessment, the development is estimated to generate 71 arrivals and 117 departures in the morning peak hour (8am – 9am), and 68 arrivals and 81 departures in the evening peak hour (5pm – 6pm) by all modes of transport. In terms of vehicle trips, just one or two car movements are expected in each peak hour, due to the very low parking provision. Deliveries to the residential units and workspace are estimated at 21 per day, with up to three to four deliveries in the peak mid-morning period of 10am-noon. As with the consented scheme, these estimated flows are too small to have any noticeable impact on the local highway network. For public transport trips, 34 to 42 bus trips are estimated in each peak hour, with 56 to 73 trips estimated by rail and Underground. These are fairly evenly split between arrivals and departures, as the mix of residential use and workspace on the site would generate flows in different directions in each peak hour.
174. Journey to work data from the 2011 census have then been used to establish likely key origins and destinations for journeys and using this data, journeys have been assigned to particular bus and rail routes. This assessment shows that less than one additional passenger would be generated on any particular bus, whilst the maximum impact on rail services would be an additional 1.9 passengers per train on the Piccadilly line into and out of Central London. The impacts are therefore considered to be negligible.
175. Transport for London have accepted the conclusions on trip generation, but have also advised that, as with other recent developments in Alperton, a contribution of £218,845 is sought towards delivering step-free access at Alperton Station. Meanwhile, the local bus network experiences capacity issues and requires improvements to accommodate this development. A financial contribution of £217,000 towards bus service improvements is sought, and the exact amount is under discussion with the applicant. As noted above, the consented scheme secured a total contribution to public transport improvements of £25,000. This would be secured through the s106 agreement.

## Active Travel Zone, Healthy Streets and Vision Zero

176. The Transport Assessment has also considered the road accident history in the vicinity of the site by looking at killed or seriously injured (KSI) accidents over the last three years (2016-2018). This identified three KSI accidents at the Bridgewater Road/Manor Farm Road mini-roundabout junction, of which two involved cyclists. This rate is considered to be high.
177. The Active Travel Zone assessment identifies several areas for improvements along the routes assessed, such as lighting, seating, maintenance, street cleansing, crossing facilities and measures to improve air quality. The development would provide CIL funding that could be directed towards any identified improvements to local pedestrian and cycling facilities in future.

178. The development would deliver highway widening along the site frontage on Bridgewater Road, significantly improving the public realm, complementing the recent improvements on Ealing Road and allowing scope to potentially provide an off-road cycle route along the frontage to bypass the roundabout. This would complement the Council's recently implemented improvements on Ealing Road and forthcoming improvements to the Ealing Road / Bridgewater Road junction. The proposal would also reduce the number of vehicle turning movements into and out of Bridgewater Road. As such, it would generally offer minor improvements to road safety in the area, rather than any disbenefits.

#### Travel Plan

179. To help to manage travel demand to and from the development, a Framework Travel Plan has been submitted as part of the Transport Assessment, covering both the residential accommodation and the workspace. Separate Travel Plan Co-ordinators would look after each aspect of the Travel Plan, under the guidance of a site-wide Sustainable Transport Manager.
180. The Framework Travel Plan sets out a number of measures to be implemented by the Travel Plan Co-ordinators to support the 'car-free' development. These include the provision of Travel Information packs, display of information on noticeboards, personal journey planning advice, promotion of local Car Clubs through three years' free membership for residents, provision of interest-free season ticket loans for workplace staff and participation in the Department for Transport Cycle to Work scheme.
181. The target is to keep travel by non-car modes above 90% of total trips, and this would be monitored one, three and five years after opening through pedestrian and cyclist counts, monitoring the use of cycle storage and monitoring of deliveries. Although this is acceptable in principle, the standard practice is to ensure travel surveys are carried out in accordance with TRICS or i-TRACE survey standards. Therefore, in securing the Travel Plan through the s106 Agreement, a clause requiring the monitoring surveys to be to appropriate standards would be required.

#### Construction Logistics Plan

182. A draft Construction Logistics Plan is included in the Transport Assessment, and considers transport arrangements during the anticipated 30-month construction period. Average deliveries are expected to total about ten vehicles per day during the majority of the works, peaking at about 16 vehicles (32 movements) in week 25 (with the superstructure works finishing and cladding and fit-out underway). As the site fronts a major London distributor road, these volumes are acceptable in principle.
183. Deliveries would be pre-scheduled using a booking system to ensure adequate unloading space and holding space within the site at all times, with deliveries to be scheduled outside of peak hours. A just-in-time system would be used to minimise on-site storage requirements, whilst goods would also be smartly procured to ensure full loads where possible.
184. Delivery vehicles would be expected to travel to the site via the A40 Western Avenue or A406 North Circular Road, leaving at the Hanger Lane junction and travelling along Ealing Road to reach the site from the south. Existing accesses would be used to enter and leave the site as per the permanent access arrangements, with vehicles restricted to left turns only with the aid of banksmen. Wheel washing facilities would be provided at the site egress. All vehicles would be FORS and CLOCS registered to maintain safety standards.
185. The site would be enclosed by hoardings and it is not anticipated that these would need to extend out over the footway of Bridgewater Road, so there is unlikely to be any need for footway closures (any such closures would need to be agreed with the highway authority under highways legislation). Only limited staff parking would be available on site, and a Travel Plan is proposed to encourage travel by alternative modes than the car.
186. The outline CLP provided in the Transport Assessment is acceptable as the basis for a final CLP, which would be required by condition when the principal contractor has been appointed and prior to commencement.

#### Conclusion

187. There are no objections in relation to transport, subject to conditions and s106 obligations as discussed

above.

### **Equalities**

188. 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**

189. On 25 May 2021 the applicants submitted a request for an Environmental Impact Assessment Screening Opinion. On 15 June 2021, the local planning authority published its Screening Opinion, which concluded that an Environmental Impact Assessment was not required for this development.

### **Conclusion**

190. 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 Section 106 Agreement.
191. The provision of industrial workspace on site represents a significant uplift on both the industrial capacity of the site and the recent extant consent. Whilst no affordable workspace is proposed, a balance has to be struck between different planning objectives, and the provision of 100% affordable housing is a significant planning benefit that carries significant weight. Whilst the scheme does fall short on the number of three bedroom homes within the development as set out within Policy BH6, the wider benefits of the scheme including 100% affordable housing with a high concentration of family sized homes within the LAR tenure, are also considered to outweigh the limited harm. As such, the conflict with policy is minimal and would be outweighed by the wider benefits of redeveloping the site for industrial workspace and affordable housing.

## DRAFT DECISION NOTICE



# Brent

DRAFT NOTICE

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

DECISION NOTICE – APPROVAL

Application No: 21/3941

To: Ms Slater  
Barton Willmore  
7 Soho Square  
London  
W1D 3QB

I refer to your application dated **18/10/2021** proposing the following:

Demolition of the existing buildings and structures, the erection of a 'co-location' scheme ranging in height from 2 to 19 storeys, incorporating industrial floorspace with residential accommodation (Use Class C3), together with associated landscaping, access arrangements, car and cycle parking, servicing and refuse and recycling facilities

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

at **Part of Westend Saab, 2A Bridgewater Road and Boyriven Textile, Bridgewater Road, Wembley, HA0 1AJ**

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

Date: 05/09/2022

Signature:

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

### Notes

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

DnStdG

**SUMMARY OF REASONS FOR APPROVAL**

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

National Planning Policy Framework 2021  
London Plan 2021  
Brent Local Plan 2019-2041

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

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

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

A2-P09-001 PL0  
A2-P11-000 PL03  
A2-P11-001 PL02  
A2-P11-002 PL04  
A2-P11-003 PL02  
A2-P11-004 PL02  
A2-P11-005 PL02  
A2-P11-006 PL02  
A2-P11-007 PL03  
A2-P11-008 PL02  
A2-P11-009 PL01  
A2-P11-010 PL0  
A2-P12-001 PL01  
A2-P12002-PL01  
A2-P13-001 PL01  
A2-P13-002 PL02  
A2-P13-003 PL01  
A2-P13-004 PL03  
A2-P13-005 PL02  
A2-P13-006 PL02  
A2-P13-007 PL03  
A2-P13-008 PL02  
A2-P13-030 PL0  
A2-P13-031 PL0  
G 8982/1 REV 0  
TM381L01 Rev B  
TM318L02 Rev A  
TM318L03 Rev A  
TM381L04 Rev #  
14372-TDA-XX-XX-DR-C-25101 Rev B  
14372-TDA-XX-XX-DR-C-25102 Rev B  
14372-TDA-XX-XX-DR-C-25103 Rev B  
SK-A-Site Plan

Air Quality Assessment (Buro Happold Engineering, Ref 042962 Rev 02, 24 August 2021)  
Arboricultural Impact Assessment and Arboricultural Method Statement (Thomson Environmental Consultants, Ref BPEA106/001/001/001, September 2021)  
Biodiversity Net Gain Assessment Report (Buro Happold, Ref 0042962 Rev P01, 28 January 2022)

Design & Access Statement (Barton Willmore, October 2021)  
Ecological Appraisal Summary and Report (Buro Happold Engineering, Ref 0042962, Rev P02, 8 September 2021)  
Electromagnetic Interference Assessment (GTech Surveys Limited, Issue 0.2, 03/09/2021)\*  
Fire Statement Policy D12 (BB7, Ref 12363BB, 4 October 2021)  
Flood Risk Assessment and Drainage Strategy (Tulley De'Ath, Ref 14372 Issue 3, October 2021)  
Landscape Strategy (Turkington Martin, March 2022)  
Main Investigation Report (Soils Limited, Ref 19485/MIR, August 2021)  
Pedestrian Level Wind Microclimate Assessment (RWDI #2103432 Rev C, 29 September 2021)  
Planning Report – Noise and Vibration (Buro Happold, Ref 0042962 Rev P04, 19 November 2021)  
Preliminary Investigation Report (Soils Limited, Ref 19485/PIR, August 2021)

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

- 3 The scheme hereby approved shall contain 2,228sqm (GIA) of light industrial floor space (use Classes E(g)(ii) (for research and development of industrial and related products and processes only) and E(g)(iii)), as defined by The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020), which shall not be used other than for these purposes unless otherwise agreed in writing by the Local Planning Authority, notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 (as amended) (or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification) and the Town and Country Planning (General Permitted Development) Order 2015 (as amended) (or any order revoking and re-enacting that Order with or without modification).

Reason: In the interests of proper planning and to ensure the use of the development is appropriate for the location.

- 4 The scheme hereby approved shall contain 173 residential units as detailed in the drawings hereby approved, unless other agreed in writing by the Local Planning Authority.
- 5 The car parking spaces, loading bays, cycle storage and bin storage facilities as shown on the approved plans or as otherwise approved in writing by the local planning authority shall be installed prior to occupation of the relevant Block that they serve and thereafter retained and maintained for the life of the development and not used other than for purposes ancillary to the occupation of the building hereby approved, unless alternative details are agreed in writing by the Local Planning Authority.

Passive provision for electric vehicle charging points shall be installed for all car parking spaces, and active provision shall be made for at least two of the spaces prior to occupation.

Car parking spaces shall be allocated to residents and occupants of the commercial floorspace in accordance with the principles set out in London Plan Policies T6.1 and T6.5, and suitable measures shall be implemented to prevent informal parking occurring elsewhere within the site.

Cycle storage shall be provided in accordance with the London Cycling Design Standards in terms of access and layout.

Reason: To ensure that the development is fit for purpose.

- 6 The development shall be constructed in accordance with the approved plans and Design & Access Statement so that at least 10% of the residential units will comply with M4(3) 'wheelchair accessible homes' standards and the remainder will comply with Building Regulations M4(2) 'accessible and adaptable homes' standards. The M4(3) homes shall be provided in accordance with the details set out in sections 7.4 to 7.6 of the approved Design & Access Statement.

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

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

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

- 8 A communal television aerial and satellite dish system for each block, or a single system for the development as a whole, shall be provided, linking to all residential units within that block unless otherwise agreed in writing by the local planning authority. No further television aerial or satellite dishes shall be erected on the premises.

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

- 9 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 Control of Dust and Emissions During Construction and Demolition SPG (July 2014), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up to date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register at <https://nrmm.london/>

Reason: To protect local amenity and air quality in accordance with Brent Policy DMP1 and London Plan Policy SI1.

- 10 Once the as-built design has been completed (upon commencement of RIBA Stage 6) and prior to the building(s) being occupied (or handed over to a new owner, if applicable), the legal owner(s) of the development should submit the post-construction Whole Life-Cycle Carbon (WLC) Assessment to the GLA at: [ZeroCarbonPlanning@london.gov.uk](mailto:ZeroCarbonPlanning@london.gov.uk). The owner should use the post construction tab of the GLA's WLC assessment template and this should be completed accurately and in its entirety, in line with the criteria set out in the GLA's WLC Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed.

Reason: To ensure whole life-cycle carbon is calculated and reduced and to demonstrate compliance with Policy SI2 of the London Plan.

- 11 The podium external amenity space shall be provided for the use of residents of each building for the lifetime of the development.

Reason: To ensure a tenure-blind development providing adequate external amenity space for all residents.

- 12 The development shall be carried out in full accordance with the approved Ecological Appraisal Summary and Report and Biodiversity Net Gain Assessment Report.

Reason: To ensure adequate protection for retained trees, and species and habitats of value.

- 13 The development shall be carried out in full accordance with the approved Flood Risk Assessment and Drainage Strategy.

Reason: To ensure adequate drainage of the site.

- 14 The development shall be carried out in full accordance with the approved Air Quality Assessment and Planning Report – Noise and Vibration.

The development shall be constructed so as to provide sound insulation against internally and externally generated noise in accordance with assessments using British Standards BS:4142, BS:8233 and BS:6472.

Reason: To ensure adequate mitigation of air quality and noise impacts

- 15 Prior to the commencement of the development a Construction Method Statement (CMS) shall be submitted to and agreed by the Local Planning Authority outlining measures that will be taken to control dust, noise and other environmental impacts of the development. The CMS shall include details of a dust monitoring plan, to be implemented during construction and demolition works.

All agreed actions shall be carried out in full.

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: Construction nuisance can occur at any time during the construction process, and adequate controls need to be in place prior to works starting on site.

- 16 Prior to commencement of the development hereby approved, a construction logistics plan shall be submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan shall include:

- i. Forecast construction trip generation and mitigation proposed;
- ii. Site access arrangements and booking systems;
- iii. Construction phasing;
- iv. Vehicular routes to the site;
- v. Details of how construction would be co-ordinated with the construction operations of other developments in the area and scope for local consolidation to reduce the number of road trips generated, so as to minimise the cumulative impacts on local residents and businesses.

The development shall thereafter operate in accordance with the approved construction logistics plan.

Reason: To ensure the development is constructed in an acceptable manner.

Reason for pre-commencement condition The condition relates to details of construction, which need to be known before commencement of that construction.

- 17 Prior to the commencement of the development hereby approved (including demolition and all preparatory work), a scheme for the protection of the retained trees, in accordance with BS 5837:2012, including a tree protection plan(s) (TPP) and an arboricultural method statement (AMS) shall be submitted to and approved in writing by the Local Planning Authority.

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

Reason: To ensure adequate protection for retained trees on and near the site.

Reason for pre-commencement condition: To satisfy the Local Planning Authority that retained trees will not be damaged during demolition or construction.

- 18 Prior to the commencement of construction works (excluding demolition, site clearance and the laying of foundations), details of how the development is 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 and the development shall be completed in accordance with the approved details.

Reason: To ensure the development is in accordance with the principles of London Plan Policy SI3.

- 19 Prior to commencement of construction work detailed plans shall be submitted to and approved in writing by the local planning authority demonstrating 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 and maintained as such in perpetuity.

Reason: To provide high quality digital connectivity infrastructure to contribute to London's global competitiveness

- 20 Following the demolition of the existing buildings and prior to the commencement of building works:

- a site investigation shall be carried out by competent persons to determine the nature and extent of any soil contamination present. The investigation shall be carried out in accordance with the principles of BS 10175:2011 + A2:2017 and the Environment Agency's current Land Contamination Risk Management Guidance.
- a report shall be submitted to the Local Planning Authority, that includes the results of any research and analysis undertaken as well as an assessment of the risks posed by any identified contamination. It shall include an appraisal of remediation options should any contamination be found that presents an unacceptable risk to any identified receptors.
- the written report shall be approved in writing by the Local Planning Authority.

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

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

- (a) details of materials for all external surfaces of the building including depth of window reveals and samples which shall be made available for viewing on site or in another location as agreed;
- (b) details of any external plant, including locations, external appearance and any proposed screening;
- (c) details of screening to a height of 1.8m above finished floor level to be installed between adjoining balconies and terraces and to the southwest-facing openings of balconies to units A202, A302, A402, A502, A602, A702, A802, A902, A1002, A1102 and A1202.

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

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

- 22 Prior to first occupation of the development, further details of soft and hard landscaping shall be submitted to and approved in writing by the local planning authority. Such details shall include:

- (a) a scaled plan showing all existing vegetation and landscape features to be retained and trees and plants to be planted;
- (b) hard surfacing, any external furniture and play equipment, and types and dimensions of all boundary treatments throughout the site, including samples which shall be made available for viewing on site or in another location as agreed,
- (c) details of soft landscaping (including species, location and densities) together with design of tree pits for trees planted within the site
- (d) details of 1.5m deep defensible space to habitable room windows facing directly onto the podium garden;
- (e) details of wind mitigation measures as recommended in the approved Pedestrian Level Wind Microclimate Assessment, the loss of two trees proposed in the approved Landscape Statement to be compensated for by low level ornamental shrub planting;
- (f) details of any ecological enhancements to be installed throughout the development as recommended in the approved Ecological Summary and Report;
- (g) details of green roofs to be installed throughout the development;
- (h) details of any external CCTV;

- (i) details of proposed external lighting design to ensure that all external areas are adequately lit in hours of darkness whilst minimising light pollution, including a light spillage plan;
- (j) a five year maintenance programme following planting, all specifications for operations associated with plant and tree establishment and maintenance to be compliant with best practise.

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

There shall be no excavation or raising or lowering of levels within the prescribed root protection area of retained trees unless agreed in writing by the Local Planning Authority.

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

Reason: To ensure a satisfactory standard of appearance and setting for the development and to ensure that the proposed development enhances the visual amenity of the locality in the interests of the amenities of the occupants of the development and to provide tree planting in pursuance of section 197 of the Town and Country Planning Act 1990.

- 23 Within six months of commencement of work on site, detailed drawings showing the photovoltaic panel arrays on the roof of the proposed building shall be submitted to and approved in writing by the Local Planning Authority. The photovoltaic panel arrays shall be installed in accordance with the approved drawings and made operational prior to occupation of the development hereby approved.

Reason: To ensure that the development minimises its carbon emissions, in accordance with London Plan Policy SI2

- 24 Prior to first occupation or use of the development:

- (i) any soil contamination remediation measures required by the Local Planning Authority shall be carried out in full
- (ii) a verification report shall be submitted to and approved in writing by the Local Planning Authority, stating that remediation has been carried out in accordance with the approved remediation scheme and the site is suitable for end use (unless the Planning Authority has previously confirmed that no remediation measures are required).

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

- 25 Prior to first occupation or use of the development, a Building Management and Maintenance Plan incorporating a Delivery and Servicing Plan shall be submitted to and approved in writing by the local planning authority. This document shall set out, inter alia, a long-term maintenance strategy for the development, measures to ensure the long-term affordability of running costs and service charges for all types of occupiers, and measures to ensure that all delivery and servicing activities can be safely accommodated on site without adversely affecting the safety and amenity of residents or other users of the development or conditions on the highway network, having regard to TfL guidance regarding Delivery and Servicing Plans.

All delivery and servicing activity shall thereafter be carried out in accordance with the approved details, unless otherwise approved in writing by the Local Planning Authority.

Reason: To ensure a high standard of design is maintained, in accordance with London Plan 2021 Policy D4, and to ensure that all delivery and servicing activities can be safely accommodated on site without adversely affecting the safety and amenity of residents or other users of the development or conditions on the highway network.

- 26 Prior to first occupation or use of the development, confirmation of the following shall be

provided to and approved in writing by the local planning authority:

1. Surface water capacity exists off site to serve the development; or
2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan; or
3. All surface water network upgrades required to accommodate the additional flows from the development have been completed.

Reason: Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid flooding and/or potential pollution incidents.

- 27 Prior to first occupation or use of the non-domestic floorspace hereby approved, and notwithstanding Condition 2, a revised BREEAM Assessment and Post Construction Certificate, demonstrating compliance with the BREEAM Certification Process for non-domestic buildings and the achievement of a BREEAM Excellent rating, shall be submitted to and approved in writing by the local planning authority.

Reason: To ensure a sustainable form of development in accordance with Brent Local Plan Policy BSUI1.

- 28 Prior to the occupation of the development, a post-construction monitoring report shall be completed in line with the GLA's Circular Economy Statement Guidance.

The post-construction monitoring report shall be submitted to the GLA, currently via email at: [circulareconomystatements@london.gov.uk](mailto:circulareconomystatements@london.gov.uk), along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation of the development.

Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials.

## INFORMATIVES

- 1 The applicant is advised that this development is liable to pay the Community Infrastructure Levy; a Liability Notice will be sent to all known contacts including the applicant and the agent. Before you commence any works please read the Liability Notice and comply with its contents as otherwise you may be subjected to penalty charges. Further information including eligibility for relief and links to the relevant forms and to the Government's CIL guidance, can be found on the Brent website at [www.brent.gov.uk/CIL](http://www.brent.gov.uk/CIL).

- 2 **Thames Water has advised the applicant of the following:**

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

[https://urldefense.com/v3/https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes\\_!!ICVb4j\\_0G!FX93jvchminFFdc80qCirNgtWroKIIMY2LpRACbLssTTr-YtUS0\\_3\\_OI0n54GD84Mye2dNs\\$](https://urldefense.com/v3/https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes_!!ICVb4j_0G!FX93jvchminFFdc80qCirNgtWroKIIMY2LpRACbLssTTr-YtUS0_3_OI0n54GD84Mye2dNs$).

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames

Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing [trade\\_effluent@thameswater.co.uk](mailto:trade_effluent@thameswater.co.uk) . Application forms should be completed on line via [https://urldefense.com/v3/http://www.thameswater.co.uk/!!CVb4j\\_0G!FX93jvchminFFdc80gCirNgtWroKIIMY2LpRACbLssTTr-YtUS0\\_3\\_OI0n54GD848hrWcTQ\\$](https://urldefense.com/v3/http://www.thameswater.co.uk/!!CVb4j_0G!FX93jvchminFFdc80gCirNgtWroKIIMY2LpRACbLssTTr-YtUS0_3_OI0n54GD848hrWcTQ$) . Please refer to the Wholesale; Business customers; Groundwater discharges section.

A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths, private swimming pools and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, commercial swimming pools, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc may be required before the Company can give its consent. Applications should be made at [https://urldefense.com/v3/https://wholesale.thameswater.co.uk/Wholesale-services/Business-customers/Trade-effluent/!!CVb4j\\_0G!FX93jvchminFFdc80gCirNgtWroKIIMY2LpRACbLssTTr-YtUS0\\_3\\_OI0n54GD84VXWSZlw\\$](https://urldefense.com/v3/https://wholesale.thameswater.co.uk/Wholesale-services/Business-customers/Trade-effluent/!!CVb4j_0G!FX93jvchminFFdc80gCirNgtWroKIIMY2LpRACbLssTTr-YtUS0_3_OI0n54GD84VXWSZlw$) or alternatively to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

As per Building regulations part H paragraph 2.21, Drainage serving kitchens in commercial hot food premises should be fitted with a grease separator complying with BS EN 1825-:2004 and designed in accordance with BS EN 1825-2:2002 or other effective means of grease removal. Thames Water further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses. Please refer to our website for further information : [https://urldefense.com/v3/http://www.thameswater.co.uk/help/!!CVb4j\\_0G!FX93jvchminFFdc80gCirNgtWroKIIMY2LpRACbLssTTr-YtUS0\\_3\\_OI0n54GD84FmR2I3w\\$](https://urldefense.com/v3/http://www.thameswater.co.uk/help/!!CVb4j_0G!FX93jvchminFFdc80gCirNgtWroKIIMY2LpRACbLssTTr-YtUS0_3_OI0n54GD84FmR2I3w$)

### 3 **Affinity Water have advised the applicant of the following:**

Any works involving excavations below the groundwater table (for example, piling or the implementation of a geothermal open/closed loop system) should be avoided. If these are necessary, a ground investigation should first be carried out to identify appropriate techniques and to avoid displacing any shallow contamination to a greater depth, which could impact the aquifer.

For further information we refer you to CIRIA Publication C532 "Control of water pollution from construction - guidance for consultants and contractors".

There are potentially water mains running through or near to part of proposed development site. If the development goes ahead as proposed, the applicant/developer will need to get in contact with our Developer Services Team to discuss asset protection or diversionary measures. This can be done through the My Developments Portal (<https://affinitywater.custhelp.com/>) or [aw\\_developerservices@custhelp.com](mailto:aw_developerservices@custhelp.com).

Due to its location, Affinity Water will supply drinking water to the development in the event that it is constructed. Should planning permission be granted, the applicant is also advised to contact Developer Services as soon as possible regarding supply matters due to the increased demand for water in the area resulting from this development.

To apply for a new or upgraded connection, please contact our Developer Services Team by going through their My Developments Portal (<https://affinitywater.custhelp.com/>) or [aw\\_developerservices@custhelp.com](mailto:aw_developerservices@custhelp.com). The Team also handle C3 and C4 requests to cost potential water mains diversions. If a water mains plan is required, this can also be obtained by emailing [maps@affinitywater.co.uk](mailto:maps@affinitywater.co.uk). Please note that charges may apply.

- 4 The applicant is advised to contact London Underground Infrastructure Protection in advance of preparation of final design and associated method statements, in particular with regard to: demolition; drainage; excavation; construction methods; tall plant: scaffolding: security; boundary treatment; safety barriers; landscaping and lighting.

London Underground have advised against locating openable windows and balconies in close proximity to the boundary with the railway embankment, as this could compromise the operational safety of the railway. London Underground require the developer to demonstrate that the development will pose no risk to the railway, and advises that the developer would be liable should such an incident occur.

- 5 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](http://www.communities.gov.uk)
- 6 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.
- 7 Given the age of the building to be demolished it is possible that asbestos may be present. The applicant should be reminded of their duties under the Control of Asbestos Regulations and must ensure that a qualified asbestos contractor is employed to remove all asbestos and asbestos-containing materials and arrange for the appropriate disposal of such materials.
- 8 The quality of imported soil must be verified by means of in-situ soil sampling and analysis. We do not accept soil quality certificates from the soil supplier as proof of soil quality.
- 9 Brent Council supports the payment of the London Living Wage to all employees within the Borough. The developer, constructor and end occupiers of the building are strongly encouraged to pay the London Living Wage to all employees associated with the construction and end use of development.
- 10 The applicant is advised to notify the Council's Highways Service of the intention to commence works prior to commencement. Such notification shall include photographs showing the condition of highway along the site boundaries.
- 11 The following British Standards should be referred to in relation to trees and landscaping works:
  - a) BS: 3882:2015 Specification for topsoil
  - b) BS: 3936-1:1992 Nursery Stock - Part 1: Specification for trees and shrubs
  - c) BS: 3998:2010 Tree work – Recommendations
  - d) BS: 4428:1989 Code of practice for general landscaping operations (excluding hard surfaces)
  - e) BS: 4043:1989 Recommendations for Transplanting root-balled trees
  - f) BS: 5837 (2012) Trees in relation to demolition, design and construction - Recommendations
  - g) BS: 7370-4:1993 Grounds maintenance part 4. Recommendations for maintenance of soft landscape (other than amenity turf).
  - h) BS: 8545:2014 Trees: from nursery to independence in the landscape – Recommendations

i) BS: 8601:2013 Specification for subsoil and requirements for use 2 Landscape

Any person wishing to inspect the above papers should contact June Taylor, Planning and Regeneration,  
Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ, Tel. No. 020 8937 2233