

1 Morland Gardens, Stonebridge

in the London Borough of Brent

planning application no. 20/0345

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Demolition of existing buildings and erection of a new mixed-use building ranging in height from three to ten storeys, to provide 65 dwellings, affordable workspace and new further education college, with associated amenity areas, public realm improvements, car and cycle parking and refuse/recycling store.

The applicant

The applicant is **London Borough of Brent** and the architect is **Curl La Tourelle Head Architecture**.

Strategic issues summary

Principle of development: The proposed residential-led mixed use development is strongly supported in principle. The replacement further education facility is strongly supported, subject to measures to ensure continued operation. Further information on the provision of the affordable workspace is required (paragraphs 18-22).

Housing: 100% affordable housing, all of which would be social rented, is strongly supported and eligible for the Fast Track Route. A contribution towards off-site play space must be secured (paragraphs 23-27).

Urban design and heritage: The proposed density, height and massing, and architecture are supported. The applicant should demonstrate that the public realm can accommodate the entry, egress and emergency assembly of students safely. The impacts of noise from the development on neighbouring and on site residential uses should be considered and mitigation measures proposed. The applicant should provide a fire evacuation lift within each building core. The loss of the locally listed building is acceptable given the overall scheme benefits (paragraphs 28-39).

Transport: Further information on how the scheme accords with the ten Healthy Streets indicators is required. The proposed servicing arrangements should be reconsidered. The level of cycle parking should be increased and meet London Cycling Design Standards. A Construction Logistics Plan and Delivery and Servicing Plan should be secured by condition; Travel Plans should be secured in the S106 agreement (paragraphs 52-60).

Further information on **inclusive design, energy, air quality, urban greening and biodiversity** is required.

Recommendation

That Brent Council be advised that the application does not yet comply with the London Plan and the Mayor's Intend to Publish London Plan, for the reasons set out in paragraph 65 of this report; but that the possible remedies set out that paragraph could address these deficiencies.

Context

1 On 6 February 2020, the Mayor of London received documents from Brent Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor has until 18 March 2020 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under 1C(c) and 3E of the Schedule to the 2008 Order:

- 1C(c) *“Development which comprises or includes the erection of a building that is more than 30 metres high and is outside the City of London.”*
- 3E “Development — (a) which does not accord with one or more provisions of the development plan in force in the area in which the application site is situated; and (b) comprises or includes the provision of more than 2,500 square metres of floorspace for a use falling within any of the following classes in the Use Classes Order— (xi) class D1 (non-residential institutions).

3 Once Brent Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The 0.4 hectare site is located in Stonebridge in the London Borough of Brent. The site does not have any strategic designations. It is located 550 metres to the north west of Harlesden town centre and the site is near two listed buildings: the Grade II listed Stonebridge Park Public House and Stonebridge School.

6 The site has an allocation for development in the draft Brent Local Plan (2019), which is at publication stage, reference BSSA14. The site allocation gives an indicative site capacity of 60 homes. It is currently occupied by the Stonebridge Centre, a further education college (adult education centre), situated within a locally listed Victorian building and its modern additions. A public garden is located at the eastern end of the site, comprising plant beds, trees and a circular metal sculpture. The site is located on a slope, rising from west to east.

7 The site is bounded by 3-storey residential building to the north along Morland Gardens. The site is accessed from the cul-de-sac of Morland Gardens where the road would have originally joined Brentfield Road, which bounds the site to the east. Hillside Road is located to the south of the site, across from which are St Michael's and All Angels Church and Stonebridge Evangelical Church. To the west the site is bounded by a 5-storey residential development, with the BrentHub Community Enterprise Centre, a GP surgery and Tesco Express retail store at ground floor.

8 The nearest rail station is Harlesden station approximately 750 metres to the south, which provides access to London Overground services. Neasden station is approximately 1.8 kilometres northeast of the site and offers London Underground Jubilee Line services. Bus stops located within 120 metres of the site on A404 Hillside provide access to one bus route, while a further two routes are accessible within 250 metres on Knatchbull Road. Consequently, the site is afforded a public transport access level (PTAL) of 4, on a scale of 0 to 6b where 6b is the highest. As such the site has good access to public transport.

9 The nearest part of the Transport for London Road Network (TLRN) is the North Circular Road (A406) approximately 900 metres to the west of the site. The nearest part of the Strategic Road Network, the A404 Hillside, is adjacent to the site. The local cycle network includes Quietway 16 which can be accessed approximately 800 metres south of the site. Quietway 16 is a traffic-free route running along the Grand Union Canal between West Drayton and Paddington.

Details of the proposal

10 The applicant is proposing the demolition of all existing buildings and the construction of 750 sq.m. of affordable workspace, a 2,651 sq.m. further education college and 65 social rented units in buildings ranging from three to ten storeys.

Table 1: Proposed floorspace

Floorspace (GIA) by use	Existing (sq.m.)	Proposed (sq.m.)	Change (sq.m.)
Further education college (D1)	1,630	2,651	+1,021
Workspace (B1)	0	750	+750
Residential (C3)	0	6,141	+6,141
Total	1,630	9,542	+7,912

11 The affordable workspace would be located at the lower ground floor and would be accessed from the lower end of Hillside Road. A two-storey atrium multi-functional space would provide a connection between the affordable workspace and the further education college above. Two multi-faith rooms would be accessed from this space. Nine car parking spaces, cycle parking and plant and servicing would also be provided at this level, with access to the car park from the north of the site via the existing access on Morland Road.

12 The further education college would be provided on the upper ground floor and would be accessed from Brentfield Road, at the upper end of the sloped site. This would comprise multiple classrooms, a library and archive, a hall, cafe, craft room and staff facilities. The existing public garden between the main entrance and Brentfield Road would be retained and improved, although would be smaller than the existing garden.

13 The residential units would be accommodated above the further education college, accessed from two cores; one at the lower end of Hillside Road and one further to the east at the upper end of Hillside Road. The units would be contained within two

towers and two lower connecting elements, surrounding a central podium courtyard containing play space and landscaping. The western tower would be seven storeys in height (from lower ground floor) and the eastern tower would be part seven and part ten storeys in height. A further area of shared and private amenity space is provided to the west of the main podium and a shared roof garden is provided on the seventh floor of the eastern tower.

Case history

14 There is no strategic planning history associated with this site.

Strategic planning issues and relevant policies and guidance

15 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises Brent Council's Core Strategy (2010), Development Management Policies (2016), Site Specific Allocations (2011) and the 2016 London Plan.

16 The following are also relevant material considerations:

- The National Planning Policy Framework (revised February 2019);
- National Planning Practice Guidance;
- The London Plan Intend to Publish version (December 2019); and
- Draft Brent Local Plan (Stage 3 – Publication Stage).

17 The relevant issues and corresponding policies are as follows:

- Social infrastructure *London Plan; Social Infrastructure SPG;*
- Affordable workspace *London Plan;*
- Housing *London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG;*
- Affordable housing *London Plan; Housing SPG; Housing Strategy; Affordable Housing and Viability SPG;*
- Urban design & heritage *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG;*
- Environment *London Plan; Sustainable Design and Construction SPG; London Environment Strategy;*
- Transport & Parking *London Plan; Mayor's Transport Strategy.*

Principle of development

Further education college

18 London Plan Policy 3.16 and Intend to Publish London Plan Policy S1 identify that additional and enhanced social infrastructure provision is required to meet the needs of London's growing and diverse population. London Plan Policy 3.18 and Intend to Publish London Plan Policy S3 seek to ensure a sufficient supply of good quality education facilities to meet demand and offer choice. The main considerations of relevance to this

application are that educational facilities should: be located in areas of identified need; be accessible by public transport; maximise the extended or multiple use of educational facilities for community or recreational use; encourage the shared use of services; and be accessible and inclusive. Development proposals should result in no net loss of educational facilities.

19 The proposal would include the provision of a 2,651 sq.m. further education college. The new further education college would be on the site of an existing college, although it would be 63% larger. The applicant notes that whilst the existing centre is well used, it is limited and restricted by the lack of space and by functional and accessibility restrictions. As such, there is a clear rationale for an expanded and improved further education college on the site; however, the applicant should clarify the estimated number of future students at the college to address urban design and transport matters. The applicant should also explain how the continued use of the college will be facilitated during construction of the development. The site has a PTAL of 4 and so is easily accessible by public transport, walking and cycling. The facilities would include a cafe open to the public; the applicant is encouraged to consider whether any other facilities could be used by community groups and the Council should secure a community use agreement for this. Overall, the principle of the proposed replacement educational use with enhanced facilities on this site is strongly supported. The application responds positively to the objective of making the best use of public land to provide enhanced social infrastructure, in line with Intend to Publish London Plan Policy S1.

Affordable workspace

20 The Mayor's Intend to Publish London Plan Policy E3 sets out defined circumstances for the provision of affordable workspace, which is let at sub-market levels. The policy states that such workspace should serve a specific social, cultural and economic development purpose. Furthermore, affordable workspace should be provided in areas identified in a local Development Plan Document where cost pressures could lead to the loss of affordable workspace or where such workspace would sustain a mix of business or cultural uses which contribute to the character of an area.

21 There would be a clear synergy between the re-provision of the further education college, which would continue to run a variety of vocational courses, and the provision of affordable workspace. However, whilst this benefit is supported, the applicant has not provided any information on the affordable workspace in terms of planning policy. The applicant should clarify which sectors the affordable workspace is intended to support and how it addresses identified cost pressures or sustains a mix of business or cultural needs, with reference to the adopted and draft Brent Local Plan, the London Plan and the Mayor's Intend to Publish London Plan. The rent levels and management arrangements for the affordable workspace should be secured within the S106 agreement.

Housing

22 London Plan Policy 3.3 sets Brent a housing completion target of 15,253 units between 2015 and 2025, which is increased to 23,250 units between 2019/20 and 2028/29 in the Mayor's Intend to Publish London Plan Policy H1. The proposal to introduce residential use to this under-utilised site responds positively to London Plan and the Mayor's Intend to Publish London Plan policies to increase housing supply and optimise the use of public land, which is supported.

Housing

23 The following residential unit breakdown has been provided with the application:

Table 2: Proposed housing provision

Housing type	1 bed units	2 bed units	3 bed units	4 bed units	5 bed units	Total units
Social rented	26	18	10	7	4	65
Percentage of units	40%	27.7%	15.4%	10.8%	6.1%	

Affordable housing

24 London Plan Policy 3.9 seeks to promote mixed and balanced communities by tenure and household income and Policy 3.12 seeks to secure the maximum reasonable amount of affordable housing. Policy H4 of the Mayor's Intend to Publish London Plan and the Mayor's Affordable Housing and Viability SPG set a strategic target of 50% affordable housing. Policy H5 of the Mayor's Intend to Publish London Plan and the Mayor's Affordable Housing and Viability SPG set out a 'threshold approach' whereby schemes meeting or exceeding a specific threshold of affordable housing (in this case 50% on public land) by habitable room without public subsidy and which meets other criteria are not required to submit viability information to the GLA, nor would the application be subject to a late stage review mechanism. At a local level, the draft Brent Local Plan (2019) sets a new borough-wide strategic target of 50% affordable housing.

25 The applicant proposes to deliver 100% of the scheme as social rented affordable housing. This offer is strongly supported and exceeds the 50% threshold for the Fast Track Route for this type of application on public land as described in Policy H5 of the Mayor's Intend to Publish London Plan and the Mayor's SPG. As the offer is 100% affordable housing, exploration of grant funding is not required. As the 100% affordable housing offer is entirely social rented, no further discount or increase in affordable housing can be achieved and so an early stage review is not required. The rent levels for the social rent units must be secured within the S106 agreement.

Housing choice

26 London Plan Policy 3.8 and the Mayor's Intend to Publish London Plan Policy H10 encourage a full range of housing choice. For low cost rent, boroughs should provide guidance on the size of units required to ensure affordable housing meets identified needs. The application proposes 32% of the units as family-sized, which addresses the strategic need for this type of accommodation and is supported.

Children's play space

27 Policy S4 'Play and informal recreation' of the Mayor's Intend to Publish London Plan and London Plan Policy 3.6 seek to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 sq. m. per child. The proposal would provide 300 sq.m. of dedicated play space, which is significantly below the calculated requirement of 643 sq.m. of play space as set out in the Mayor's SPG; however, the play space would

exceed the calculated provision of 241 sq.m. for children aged 0-5 years old. The applicant has identified play space at Lawrence Avenue within 400 metres of the site but this is not dedicated play space for children aged between 5-11 years. The applicant has identified play space for children aged 12+ years old at Stonebridge Recreation Ground around 400 metres away and at Paulet Way and Gibbons Recreation Ground, both within 800 metres of the site, which is acceptable. The applicant has acknowledged the lack of dedicated play space for 5-11 year olds and is willing to make a financial contribution towards off-site play space. This is welcomed and would address the deficiency of on-site play space and should be secured within the S106 agreement.

Urban Design

28 London Plan Policies 7.1 and 7.4 and the Mayor's Intend to Publish London Plan Policies D1, D2 and D3 seek to ensure that new developments are well-designed and fit into the local character of an area. New buildings and spaces should respond to the form, style and appearance to successfully integrate into the local character of an area, with a positive relationship with the natural environment and respect and enhancement of the historic environment.

29 The general layout is supported. The proposal effectively optimises the ground floor uses and change in site levels by making use of the space underneath the further education college for affordable workspace, car parking and servicing. This enables the main frontages of the development to be well activated. On the upper floors, the layout of the units is logically oriented around a central green space and the location of the two residential towers next to Hillside helps to mitigate the impacts of the development on neighbouring residential properties to the north. The proposed shared private amenity space is well laid out, with a variety of more public and more secluded spaces, with effective use made of the limited available space for play space and landscaping. The use of the pitched roofs of the further education college for play equipment and skylights is particularly creative.

30 The proposal would retain an area of public realm to the east of the development along Brentfield Road in place of the existing public garden. Given that this space is contained between the main entrance of the college and Brentfield Road, it will be extensively used by students arriving and leaving the college. This space is stated to be the same size as existing, although it appears narrower than before. Officers are therefore concerned that the space is insufficient to accommodate the number of students using the college safely, with the potential for students to spill out onto the road, creating conflict between pedestrians and vehicles. The applicant should clarify how many students would be using the college and demonstrate that the public realm in this area is sufficient to allow for the safe entry, egress and emergency assembly of students from the development. The applicant should set back the building line further into the site if the space is insufficiently large. The applicant should also consider retaining some of the existing trees in this area.

31 The proposed maximum building heights are noticeably taller than the immediate surroundings, although the approach to massing has been sensitively considered to break up the two tallest elements and step down to the low-rise context to the north. The proposed height would be similar to nearby developments, including the nine storey Camellia Heights. The location of the tallest tower on the junction of Hillside and Brentfield Road will mark this key intersection and aid with wayfinding to the further education

college. The development includes a varied roof line, which creates a visually interesting development and avoids a “wall-like” massing.

32 The proposed architecture is supported. At ground floor the facade would feature a strong red band and arched entrances, with large windows facing onto Hillside. This would create a distinctive and active frontage around all of the public areas of the building, allowing views into the activities of the further education college and workspace, which is strongly supported. The main balconies are well integrated into the facade, providing a strong repeating pattern to the development. The cantilevering curved balconies are a thoughtful addition to the facade that provide variety and subtly extend the amount of external amenity space for each unit. The units connecting the two towers are also well designed, with large areas of external amenity space for each unit. The proposed arched parapets and balcony trims are an elegant reference to the existing Victorian house and the parapets are effective at hiding the plant on the roof. The Council should secure details of facing materials and building details such as roof lines at by condition to ensure a high quality of materials and architecture is secured.

Agent of change

33 The Mayor’s intend to publish London Plan Policy D10 requires applicants to take account of the Agent of Change principle and consider and mitigate for existing noise and other nuisance generating uses in a sensitive manner in new development. The proposed expanded further education college has the potential to generate additional noise, which could affect receptors in neighbouring residential properties as well as in the residential properties above it. The submitted noise assessment only considers the impact of noise on the development; the applicant should consider the impacts of noise from the development on neighbouring and on site residential uses and propose appropriate mitigation measures.

Housing quality

34 London Plan Policy 3.5 and the Mayor’s Intend to Publish London Plan Policy D6 promote quality in new housing provision, with further guidance provided in the Mayor’s Housing SPG. All of the units would meet the London Plan and the Mayor’s Intend to Publish London Plan minimum space standards, which is supported. Most of the units would meet or exceed the private amenity space requirements. Unit 02-08 has 0.5 sq.m. and unit 03-04 has 1.8 sq.m. less private amenity space than required; the applicant should increase the provision of this amenity space and demonstrate that the spaces are practical in terms of shape and utility. 75.4% of the units would be dual aspect and there are no north-facing single aspect units, which is supported.

Fire safety

35 In accordance with Policy D12 ‘Fire safety’ of the Mayor’s Intend to Publish London Plan, the applicant has produced a fire statement, produced by a third party suitable qualified assessor. The statement includes details of: the construction methods, products and materials; the means of escape for all building users; features which reduce the risk to life, including sprinklers in all apartments; access for fire service personnel and equipment; and access for fire appliances. The applicant should consider how future modifications to the building will not compromise the base build fire safety and protection measures. The applicant should also provide a fire evacuation lift within each building core for the evacuation of wheelchair users and other less mobile occupants.

Heritage

36 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions “*should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*”. If harm is identified, it should be given considerable importance and weight.

37 The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset’s conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset’s physical presence or its setting. Where a proposed development will lead to ‘substantial harm’ to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to ‘less than substantial harm’, the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Policy HC1 ‘Heritage conservation and growth’ of the Mayor’s Intend to Publish London Plan, as well as London Plan Policy 7.8, states that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets.

38 The site includes a locally listed Victorian building that is proposed to be demolished. This would be contrary to London Plan and Intend to Publish London Plan policy, however the NPPF (paragraph 197) is clear, in relation to non-designated heritage assets, that “a balanced judgement will be required having regard to the scale of harm or loss and the significance of the asset”. In this instance, the demolition of the building would lead to a total loss of significance. However, the proposed development would deliver considerable public benefits, including a modern further education centre, workspace and 65 social rented residential units. It is clear from the submission that the existing building is not fit-for-purpose. Furthermore, the applicant’s submission demonstrates that extensive consideration has been given to alternative configurations that retain the locally listed building. These were understandably ruled out as they don’t deliver the required improved educational facilities. As such, on balance, the loss of the locally listed building is considered acceptable in this instance.

39 The site is near two listed buildings: the Grade II listed Stonebridge Park Public House and Stonebridge School. The applicant has not provided any assessment of the impacts on the Stonebridge Park Public House and Stonebridge School. Officers consider that intervening development would substantially, if not completely, obscure the proposal. As such there would be no impact on the setting of these two listed buildings and no harm to their significance as a result of the development.

Inclusive design

40 London Plan Policy 7.2 and the Mayor’s Intend to Publish London Plan Policy D3 seek to ensure that proposals achieve the highest standards of accessible and inclusive design (not just the minimum) ensuring that developments can be entered and used safely, easily and with dignity by all; are convenient and welcoming with no disabling

barriers, providing independent access without additional undue effort, separation or special treatment; and are designed to incorporate safe and dignified emergency evacuation for all building users. It is not clear how wheelchair users can access the multi-faith rooms; a lift is shown between lower ground and upper ground floors and the applicant should clarify if this is for general use. The further education college would be located entirely on one level (with the exception of the multi-faith rooms), which avoids barriers to access and is strongly supported. The remainder of the non-residential development could also achieve the highest standards of accessible and inclusive design, subject to addressing the lack of inclusive cycle parking as detailed in the transport section.

41 Policy 3.8 of the London Plan and the Mayor's Intend to Publish London Plan Policy D5 requires that at least 10% of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. The proposal would provide 10% of homes as wheelchair accessible, equivalent to 7 homes. The Council should secure M4(2) and M4(3) requirements by condition as part of any permission.

Sustainable infrastructure

Air quality

42 The application is for a major development within an Air Quality Management Area. As such, in accordance with London Plan Policies 3.2, 5.3 and 7.14 and the Mayor's Intend to Publish London Plan Policy SI1 an Air Quality Assessment is required. Policy SI1 states that this should take an Air Quality Neutral approach.

43 The Air Quality Neutral assessment has not been carried out correctly, and therefore compliance with London Plan Policy 7.14 and the Mayor's Intend to Publish London Plan Policy SI1 cannot be determined. The Air Quality Neutral assessment must assess both building and transport emissions for all proposed land use classes. A scheme of mitigation should be proposed to address any exceedances of the Air Quality Neutral benchmarks. The reduction in car parking compared to existing uses is, however, welcomed.

44 An assessment of the emissions from the gas-fired boiler has not been undertaken, and it is not known whether there will be adverse impacts on air quality as a result. Compliance with London Plan Policy 7.14 and the Mayor's Intend to Publish London Plan Policy SI1 cannot therefore be determined. Building emissions must also be taken account in the revised Air Quality Neutral assessment. The assessment has determined there will be exposure to poor air quality (exceeding the air quality objectives) in some parts of the proposed development closest to roads. The impacts of the proposed gas-fired boilers on existing off-site receptors and proposed on-site receptors should be assessed using dispersion modelling should emissions exceed the IAQM/EPUK screening criteria. The applicant must submit details of a mitigation scheme to ensure future occupants are exposed to acceptable air quality.

Energy

45 In accordance with the principles of London Plan Policy 5.2 and Policy SI2 of the

Mayor's intend to publish London Plan, the applicant has submitted an energy statement, setting out how the development proposes to reduce carbon dioxide emissions. The approach proposed would achieve a 10% carbon dioxide reduction for the domestic element and a 17% reduction for the non-domestic element against 2013 Building Regulations. The carbon dioxide savings for the domestic and non-domestic elements fall short of the target within Policy 5.2 of the London Plan and the Mayor's intend to publish London Plan Policy SI2. To ensure compliance with the London Plan and the Mayor's intend to publish London Plan the applicant must: carry out an overheating analysis; follow the heating hierarchy by providing further information on district heating network connection and the potential for future connection and providing further information on the ambient loop heat pumps; and ensure the provision of PV and provide a detailed roof plan showing this.

Drainage and water

46 The surface water drainage strategy provides an assessment of greenfield runoff rates, existing runoff rates, and attenuation storage required to restrict the 100 year (plus 40% climate change) post-development discharge rate to greenfield rate. The surface water drainage strategy proposes a mix of green roofs, raingardens, permeable paving and attenuation tanks. This represents a good response to London Plan Policy 5.13 and the Mayor's Intend to Publish London Plan Policy SI13 and is supported.

47 The proposed development generally meets the requirements of London Plan Policy 5.15 and the Mayor's Intend to Publish London Plan Policy SI5. The applicant should also consider water harvesting and reuse to reduce consumption of wholesome water across the entire development site. This can be integrated with the surface water drainage system to provide a dual benefit.

Green infrastructure and natural environment

48 London Plan Policy 5.10 and the Mayor's Intend to Publish London Plan Policy G5 state that developments should provide new green infrastructure that contributes to urban greening. Policy G5 also sets out a new Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. Paragraph 170 of the NPPF and the Mayor's Intend to Publish London Plan Policy G6 support the net gain of biodiversity through planning decisions and Policy G6 further states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. London Plan Policy 7.21 and the Mayor's Intend to Publish London Plan Policy G7 seek to protect existing trees of value, which should be retained where possible or otherwise replaced.

49 The proposal includes a variety of new green infrastructure, including a re-provided public garden, as well as extensive podium planting and green roofs. The proposed development presents a well-considered approach to integrating green infrastructure and urban greening. The applicant should provide the UGF score for the development with the aim of meeting the target of 0.4 for predominantly residential developments as set out in the Mayor's Intend to Publish London Plan Policy G5. A drawing showing the surface cover types and accompanying UGF calculation should be submitted.

50 The applicant has identified the need to take measures to protect potential bat roosts within the existing site and measures, including bat boxes and planting for foraging for bats, to provide roosting within the new development. The planning statement refers to

an ecological statement being carried out; however, this is not apparent in the submitted materials and should be provided. This should outline the impacts of development and mitigation for other species as well as bats and measures to provide biodiversity net gain within the proposal in line with the NPPF and the Mayor's Intend to Publish London Plan Policy G6.

51 The Category B group of existing trees identified as G2 on the eastern site boundary are shown for removal to be replaced by a paved area and a small area of planting. The applicant should provide justification for the removal of this tree group given it appears that some of the trees could be restored in this area as part of the proposals. The applicant should consider planting large canopied tree species in the public realm which provide a wider range of benefits because of the larger surface area of their canopy.

Transport

Healthy Streets and the Mayor's Vision Zero Action Plan

52 The applicant is required to demonstrate how the scheme accords with the Mayor's Intend to Publish London Plan Policy T2 on Healthy Streets. The applicant has not undertaken an Active Travel Zone assessment in accordance with the Healthy Streets Transport Assessment guidance. Nevertheless, the applicant has undertaken audits which have assessed the local pedestrian and cycle environments. The applicant must provide further information on what improvements will be secured from these assessments. Furthermore, the applicant must also demonstrate how the proposal will positively contribute towards the Mayor's Vision Zero Action Plan.

Access

53 The existing vehicle access from A404 Hillside will be removed and a new vehicle access from Morland Gardens will be provided. The principle of this is welcomed, subject to a Stage 1 Road Safety Audit. Additionally, it is noted that the new access will necessitate the loss of six on-street car parking spaces on Morland Gardens, which is supported.

54 Refuse collection, deliveries and servicing (for larger vehicles) are proposed via a shared surface loading bay accessed from A404 Hillside. The Mayor's Intend to Publish London Plan Policy T7 requires the provision of adequate space for servicing and deliveries, which should be made off-street, with on-street loading bays only used where this is not possible. The proposed location of the loading bay is in very close proximity to the existing bus stop. Swept path analysis demonstrates that a refuse vehicle would not encroach the bus cage when accessing the loading bay; however, the footway width on the northern side of A404 Hillside would be severely restricted when the loading bay is occupied, creating safety hazards for pedestrians attempting to use the footway or waiting at the bus stop. Therefore, the proposed servicing arrangements raise concerns in terms of compliance with the Mayor's Intend to Publish London Plan Policies T2 and T7 and should be reconsidered.

Car parking

55 The proposal is car-free (with the exception of Blue Badge parking) in accordance with Policy T6.1 of the Intend to Publish London Plan. 7 Blue Badge parking spaces are

proposed, which complies with the requirement for a minimum of 3% provision from the outset and an overall provision of 10% to meet future demand. The provision of 10% from the outset is welcomed.

56 Two car parking spaces are proposed for staff of the further education college. Officers would support the provision of these spaces as Blue Badge car parking for the proposed college and affordable workspace, given that disabled parking is not proposed for these elements of the scheme. Intend to Publish London Plan Policy T6.5 requires all non-residential elements of a development to provide at least one on or off-street disabled parking bay. A Section 106 clause restricting residents from obtaining permits for the local controlled parking zones would be welcomed.

57 The car park should be monitored, managed and enforced through a Parking Design and Management Plan secured by condition. In accordance with the Intend to Publish London Plan, 20% of parking spaces must have an active electric vehicle charging point and at least passive provision is required for the rest; this must be secured by condition.

Cycle parking

58 112 long-stay cycle parking spaces are accommodated at lower ground floor and an additional 26 long-stay spaces are accommodated at upper ground floor. The Mayor's Intend to Publish London Plan requires a minimum provision of 117 long-stay spaces for the residential development, 26 long-stay spaces for the college and 5 long-stay spaces for the affordable workspace. The proposed long-stay provision therefore falls short of the minimum requirements by 10 spaces. In accordance with London Cycling Design Standards (LCDS), 5% of spaces should be wider spaces for non-standard bicycles. Supporting facilities including showers, changing rooms and lockers should be provided where feasible. 36 short-stay cycle parking spaces are provided at the northeast corner of the site within the public realm. This provision would meet the minimum requirements for the proposed college; however, a further provision of 5 visitor spaces is required to serve the residential development and affordable workspace and should include 20% Sheffield stand provision. Therefore, the proposed level of cycle parking should be increased. Further detail is also required on the cycle access routes to parking locations, the type of provision and to confirm compliance with LCDS in line with the Intend to Publish London Plan.

Trip generation impacts

59 With regard to the trip generation and impacts, the proposal will result in a net increase of 113 and 109 two-way person trips in the AM and PM peaks respectively. However, a detailed assessment of impacts on the local public transport network has not been undertaken. This is required and may result in the requirement for a contribution towards enhanced capacity.

Deliveries, servicing, construction logistics and Travel Plans

60 A Construction Logistics Plan (CLP) should be secured by condition. The CLP will need to include co-ordination arrangements with any other developments in the area to ensure management of cumulative impacts. A Delivery and Servicing Plan should be secured by condition and include consideration of management of deliveries to the college,

affordable workspace and residential development. Full Residential and Workplace Travel Plans should be secured through the Section 106 agreement.

Local planning authority's position

61 Brent Council officers are currently reviewing the application. A committee date for the application has not yet been set.

Legal considerations

62 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008, the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purposes of determining the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

63 The Equality Act 2010 provides that in exercising its functions (which includes the functions exercised by the Mayor as Local Planning Authority), that the Mayor as a public authority shall amongst other duties have due regard to the need to a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act; b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it. The protected characteristics set out in the Equality Act are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Equality Act acknowledges that compliance with the duties set out may involve treating some persons more favourably than others, but that this does not permit conduct that would otherwise be prohibited under the Act. Officers will consider the applicant's response to access to the multi-faith rooms and potential transport impacts on nearby churches in terms of the development's potential impact on the practice of religion or belief. Other matters of consideration where equality issues may arise include the provision of accessible housing and parking bays, the provision of accessible cycle parking, the provision of affordable and family housing, the provision of replacement and new social infrastructure, and the protection of neighbouring residential amenity.

Financial considerations

64 There are no financial considerations at this stage.

Conclusion

65 London Plan and the Mayor's Intend to Publish London Plan policies on educational facilities; affordable workspace; housing; affordable housing; social infrastructure; design; heritage; inclusive design; energy; water and drainage; urban greening and biodiversity;

and transport are relevant to this application. Having regard to these policies the application complies with some of these policies but not with others as per the schedule below:

- **Principle of development:** The proposed residential-led mixed use development is strongly supported in principle. The replacement further education facility is strongly supported, subject to measures to ensure continued operation. Further information on the provision of the affordable workspace is required.
- **Housing:** 100% affordable housing, all of which would be social rented, is strongly supported and eligible for the Fast Track Route. A contribution towards off-site play space must be secured.
- **Urban design:** The proposed density, height and massing, and architecture are supported. The applicant should demonstrate that the public realm can accommodate the entry, egress and emergency assembly of students safely. The impacts of noise from the development on neighbouring and on site residential uses should be considered and mitigation measures proposed. The applicant should provide a fire evacuation lift within each building core.
- **Heritage:** The loss of the locally listed building is acceptable given the overall scheme benefits.
- **Inclusive design:** The Council should secure M4(2) and M4(3) requirements by condition as part of any permission. The applicant should clarify how wheelchair users would access the multi-faith rooms.
- **Sustainable infrastructure:** The Air Quality Neutral assessment must assess both building and transport emissions for all proposed land use classes and details of a mitigation scheme provided. The impacts of the proposed gas-fired boilers on existing off-site receptors and proposed on-site receptors should be assessed. The applicant should provide further information on overheating, district heating connection and future-proofing and photovoltaics. The proposed development generally meets London Plan and the Mayor's Intend to Publish London Plan policies on drainage and water infrastructure.
- **Green infrastructure and natural environment:** The extensive area of urban greening is strongly supported. The applicant should provide the UGF for the development with the aim of meeting the target of 0.4 for residential developments as set out in the Mayor's Intend to Publish London Plan Policy G5. The applicant should provide further information on biodiversity mitigation and net gain and should consider retaining some of the existing trees.
- **Transport:** Further information on how the scheme accords with the ten Healthy Streets indicators is required. The proposed servicing arrangements should be reconsidered. The level of cycle parking should be increased and meet London Cycling Design Standards. A Construction Logistics Plan and Delivery and Servicing Plan should be secured by condition; Travel Plans should be secured in the S106 agreement.

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