

Brent House, 349-357 High Road, Wembley

in the London Borough of Brent

planning application no.15/4743

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

Proposed demolition of existing office building and erection of two buildings of between eight and ten storeys accommodating 248 dwellings (84 x 1-bedroom, 108 x 2-bedroom, 49 x 3-bedroom & 7 x 4-bedroom units) and flexible commercial space at ground floor (for Use Classes A1, A2, A3, A4 and/or B1(a)), new public square, landscaped communal gardens and basement car and cycle parking.

The applicant

The applicant is **Henley Homes PLC** and the agent is **PPM Planning Limited**.

Strategic issues

The principle of development, given its designations is supported in strategic terms. Further information in relation to **affordable housing, housing mix, design, inclusive design, energy, flooding/drainage and transport** are required to demonstrate that the scheme is fully compliant with the London Plan.

Recommendation

That Brent Council be advised that while the application is generally acceptable in strategic planning terms the application does not comply with the London Plan, for the reasons set out in paragraph 83 of this report; but that the possible remedies also set out in that paragraph of this report could address these deficiencies.

Context

1 On 10 November 2015 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 21 December 2015 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.

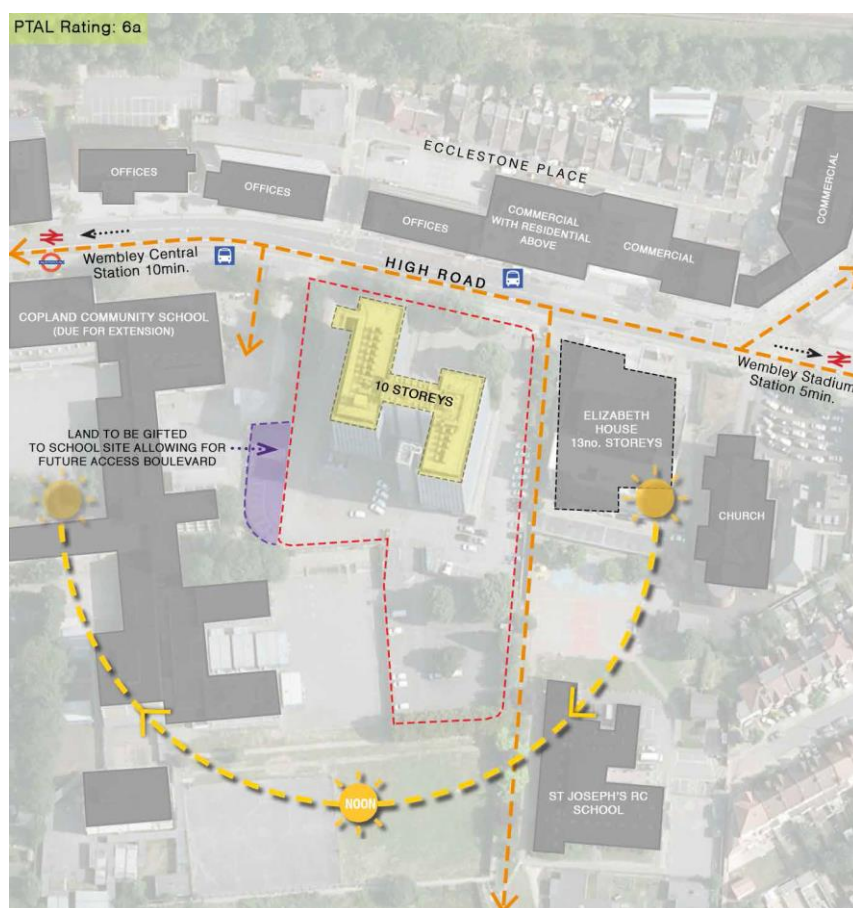
2 The application is referable under Categories 1A and 1C of the Schedule to the Order 2008: *“Development which comprises or includes the provision of more than 150 house, flats or house and flats.”* And *“development which comprises or includes the erection of a building more than 30 metres high and is outside the City of London.”*

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 0.77 hectare site is located at 349-357 High Road, in the London Borough of Brent and is in close proximity to Wembley Stadium. The site is bound to the north by the A404 Wembley High Road, which forms part of the Strategic Road Network (SRN), to the east by the recently completed Elizabeth House, a new 13 storey mixed use development, and to the south and west by Copland Community College, St Joseph’s Junior School and associated playing fields.



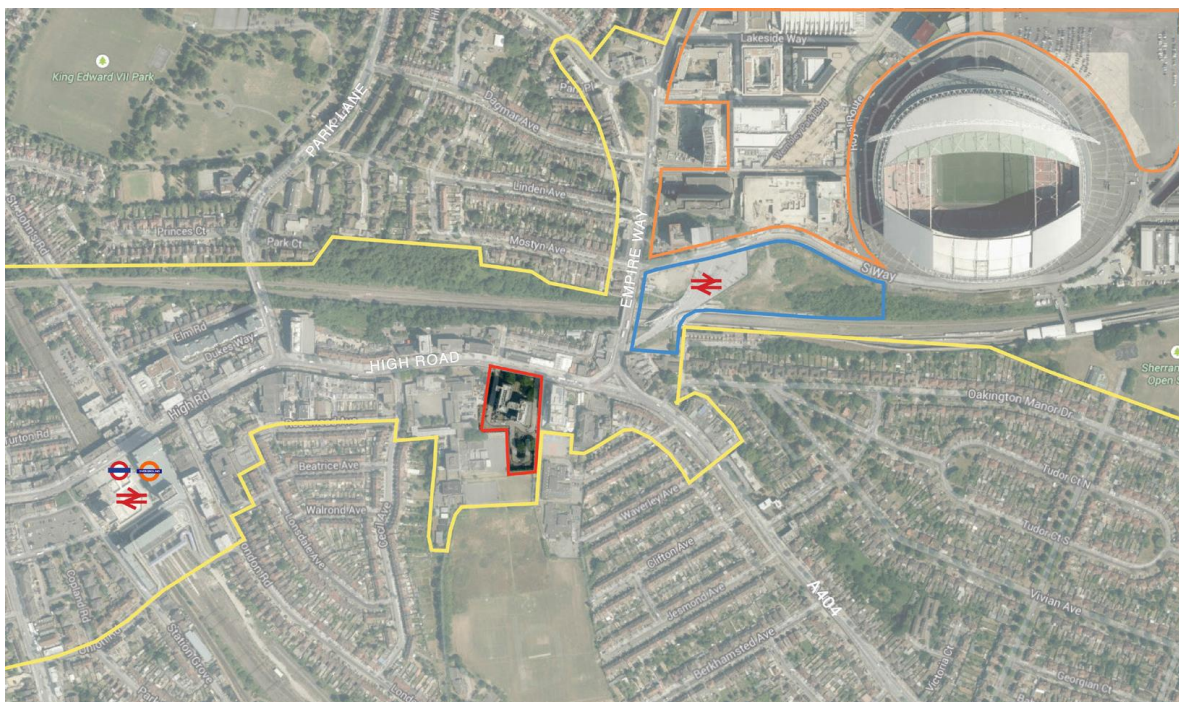
(Source: Design and Access Statement, October 2015- site description map page 9)

6 The nearest part of the Transport for London Road Network (TLRN) is the A406 North Circular Road approximately 1.5km to the south-east. Six bus routes stop on the High Road outside the site, with a further three routes stopping 400m to the west along the High Road. Wembley Stadium station, served by national rail services to Marylebone (Chiltern Line), is 250m to the east of the site. Wembley Central London Underground and Rail station is some 600 metres to the west, served by the Bakerloo line and London Overground services into Euston from Watford Junction. Wembley Central is also served by the West London route of the Southern Railway Network which operates between Milton Keynes Central and South Croydon, as well as a limited London Midland service which operates between London Euston and Tring. As such, the site has an excellent Public Transport Accessibility Level (PTAL) of 6a on a scale of 1 to 6b- on a scale of 1-6 where 6 is most accessible.

7 The site is occupied by a commercial building and was previously occupied by Brent Council. The Brent House site is located geographically within the Wembley Housing Zone. The existing building has stepped access as the site is on a 2.5 metre gradient from the road.

8 The site also lies within the boundaries defined in the Wembley Area Action Plan as the Wembley Regeneration Area, the boundary of which is shown in the area picture below, in yellow. The Brent Site Specific Allocations Document also defines this area as the Wembley growth area. The High Road, onto which the site fronts, is designated as a Major Opportunity Site within the regeneration proposals for the Wembley area. The site lies west of the 'Wembley High Road link' (shown in blue), which is defined as an opportunity area in the Wembley Masterplan SPD to create an area of special character to revive the High Road.

The application site within the Wembley Regeneration Area



(Source: Applicant's Design & Access Statement submission document, October 2015)

Details of the proposal

9 Planning permission is being sought for a mixed use scheme comprising 6,114sq ft of commercial floor space on the ground floor and 248 residential units on the upper floors. The scheme will consist of two towers split into five blocks (A-E) ranging from seven to ten stories in height. The development will include an undercroft car park with 16 car parking spaces and 412 cycle spaces.

Case history

10 The applicant met with GLA officers on 5 February 2015 to discuss a proposal for this site at a pre-application meeting. At that stage, the application proposal was as follows:

Redevelopment of the site with a mixed use development between 7 and 13 storeys, accommodating circa 288 residential units, 900 sq.m. commercial space (at ground floor level), a new public square, landscaped communal spaces and basement car parking and cycle parking.

11 The scheme was revised for a number of reasons including design, scale, viability and public concern. The main changes relate to the height which has been reduced from between 7 and 13 storeys to between 8 and 10 storeys and the number of units reduced from 288 to 248 (although the same percentage of affordable housing is proposed at 30%). The basement space has also been reduced largely because the consultation scheme proved to be extremely expensive.

Strategic planning issues and relevant policies and guidance

12 The relevant issues and corresponding policies are as follows:

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|---------------------------|---|
| • Mix of uses | London Plan |
| • Retail/town centre uses | London Plan; Town Centres SPG |
| • Housing | <i>London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG;</i> |
| • Affordable housing | <i>London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy</i> |
| • Density | <i>London Plan; Housing SPG</i> |
| • Urban design | <i>London Plan; Shaping Neighbourhoods: Character and Context, SPG; Housing SPG; London Housing Design Guide; Shaping Neighbourhoods: Play and Informal Recreation SPG</i> |
| • Access | <i>London Plan; Accessible London: achieving an inclusive environment SPG;</i> |
| • Sustainable development | <i>London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy</i> |
| • Transport | <i>London Plan; the Mayor's Transport Strategy;</i> |
| • Parking | <i>London Plan; the Mayor's Transport Strategy</i> |
| • Crossrail | <i>London Plan; Mayoral Community Infrastructure Levy;</i> |

13 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Brent Core Strategy (July 2010), the Brent Site Specific Areas Development Plan Document (2011), the Wembley Area Action Plan (January 2015) and, the 2015 London Plan and the Brent Unitary Development Plan (2004) 'saved policies'.

14 The following are also relevant material considerations:

- National Planning Policy Framework, Technical Guide to the National Planning Policy Framework and National Planning Practice Guidance;
- The draft Development Management Policies Document (the June-July 2014 version was amended following consultation and approved by the Council's Cabinet on 21 September 2015 and the examination for this is proposed to take place in winter/spring 2016).
- The Wembley Masterplan SPD
- Draft Minor Alterations to the London Plan (MALP 2015)

Principle of development

Town Centre uses

15 The existing site lies within a designated major town centre as defined in London Plan policy 2.15, and Annex Two (Table A2.1). In line with policy 2.15, development in such centres should sustain and enhance the vitality and viability of the town centre function, accommodate economic and housing growth through intensification and contribute to an enhanced environment. In addition, retail, commercial and leisure development should be focussed on sites within town centres and related to the size, role and function of a town centre and its catchment in line with London Plan policy 4.7.

16 The proposed mixed use commercial/retail and residential space is therefore acceptable and in line with the London Plan and the aspirations of the Wembley Area Action Plan and Wembley Core Strategy. Paragraph 4.33 of the latter states: *'The Council's key spatial objectives include revitalising town centres and securing regenerative development in Wembley which is strategically important to London as a whole.'* It further states in paragraph 4.39 that *'the Masterplan proposes linking the two retail areas of Wembley and Wembley Park. The development of this new retail street is a long term proposal and its development is contingent on creating a continuous retail link from the High Road. The creation of this new shopping street will help facilitate the redevelopment of the eastern end of the High Road, creating a continuous retail link. Together with the delivery of the housing, commercial, retail, leisure and community facilities proposed in the Core Strategy, the new shopping street will be the driver for change in this part of Wembley.'*

17 The site is within the Wembley Growth Area and the subject of Site Specific Allocation (Site W5), within the adopted Wembley Area Action Plan (2015). This allocation supports mixed use development and allows for the redevelopment of Brent House as a standalone development. The principle of development is therefore acceptable.

Residential use

18 The provision of residential accommodation on this site is supported by London Plan policy 3.3, which seeks to increase London's supply of housing and in doing so sets borough housing targets, of which Brent's is 1,525 homes per year between 2015/16-2024/25.

19 The scheme is a practical example of town centre intensification, which is supported by the London Plan and Town Centres SPG, and would increase housing supply. The proposed development makes a significant contribution to the local supply of housing through the net addition of 248 residential units at a highly sustainable location, which is supported. It is understood by GLA officers that the Council is disposing of Brent House to support the regeneration of the town centre and the residential offer will accelerate and increase the development capacity of the Housing Zones in Brent. However the housing specific matters raised below should be addressed to make the application fully policy compliant.

Employment use

20 The existing 1960s style office block at the site is vacant and was previously occupied by Brent Council. A significant loss in office floor space is proposed by the applicant, which is to reflect the current lower demand trend along the High Road. The High Road is described as comprising a large amount of vacant office accommodation, which is to be revived with '*new office accommodation in line with the comprehensive development of the growth area*', by the Council in its Core Strategy.

21 At the pre-application stage, the applicant was informed that the site is not designated for specific employment use within the London Plan and therefore the loss of such space does not raise any strategic concerns. The Council also considers the loss of the office space to be acceptable in policy terms, and this is further reflected in the site allocation (W5), as stated earlier. The allocation also does not require a re-provision of office floorspace. The Council have evidence to suggest that there is a surplus of older 1960's office stock in the Wembley Area, and as such, its loss is not seen to be an issue and no economic assessment was requested by the Council to justify the loss.

22 Given that the proposal is in keeping with the direction of the Council, and that the commercial enhancements to the High Road will help to contribute towards the continuous eastwards shopping parade from the High Road to Wembley Park, the principle of development is supported.

Housing

Proposed residential mix

23 The application, in total proposes 248 residential units, of which 30% (74 units) will be delivered as affordable housing with a tenure split of 61% affordable rent and 39% intermediate. The scheme will provide 56 family units (three and four bedroom properties).

A summary of the residential accommodation is set out in the table below.

	1bed 2p	2bed3p	2bed4p	3bed5p	4bed6p	Total
Block A	7	14	0	14	7	42
Block B	25	1	10	10	0	46
Block C	0	14	13	18	0	45
Block D	36	28	0	0	0	64
Block E	16	7	21	7	0	51

Total	84	64	44	49	7	248
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A summary of the proposed affordable housing mix and tenure split being proposed is set out in the table below:

Unit type	Intermediate affordable housing	Affordable rent	Total
One-bed	16	8	24
Two-bed	7	15	22
Three-bed	6	15	21
Four-bed	0	7	7
Total	29	45	74

Tenure split and maximum reasonable amount of affordable housing

24 The scheme proposes 30% affordable housing by habitable room or a quantum of 74 units out of the total 248 units, and 70% private housing. The affordable housing will have a tenure split of 61% affordable rent and 39% intermediate.

25 There should be a mix of tenures, unless otherwise justified by the applicant's viability assessment to comply with London Plan Policy 3.11 and the Mayor's Housing Supplementary Planning Guidance (SPG), which requires 60% of overall housing provision to be social housing, and 40% for intermediate provision for the purposes of meeting affordable housing targets. As a result, the current split of affordable housing is considered to be policy compliant.

26 It is understood that the applicant's viability assessment results are currently being independently assessed by the Council. The results of which should be shared with GLA officers. This will be required to verify that the maximum reasonable amount of affordable housing is being delivered at this site.

Housing choice/mix

27 A mixture of 1, 2, 3 and 4 bedroom units are proposed with blocks A/B comprising the affordable units and blocks C/D/E the private element. Overall, the unit mix provided should be justifiable in terms of local needs (agreed to by the Council) and priority should be accorded to the provision of affordable family housing in line with the London Plan, against the currently high proportion of 1 bed units, which equate to 34% of the overall housing provision. The Council's Development Management document, policy DMH3 states that "Planning permission for 1 bedroom market accommodation will be granted where; 1 person/studio accommodation does not exceed 5% of all market units, and the overall provision of all 1 bedroom market units including studios does not exceed 20%." Therefore the applicant will need to readdress the housing mix to ensure that local needs, and strategic requirements are being met, whilst also acknowledging the town centre nature of this mixed use scheme.

28 Overall, the affordable family housing mix is acceptable however consideration should be given to the number of one bed market units as stated above.

Density

29 London Plan Policy 3.4 requires development to optimise housing output for different locations taking into account local context and character, design principles set out in London Plan Chapter 7 and the public transport capacity; table 3.2 provides density guidelines in support of this. The site has a public transport accessibility level (PTAL) of 6a. The site lies in a central setting, as defined by the London Plan and based on the site's PTAL range, a density range of 650 – 1,100 habitable rooms per hectare (hr/ha) should be applied to the scheme as indicated by Table 3.2. The applicant's planning statement proposes a gross density of 965 hr/ha and a net density of 991 hr/ha, which is an appropriate density for residential accommodation in this central location, and is supported.

Children's play space/amenity space provision

30 In line with London Plan policy 3.6 and the supplementary planning guidance on 'Providing for Children and Young People's Play and Informal Recreation' it is predicted that this scheme will have a child occupancy level of approximately 104 children. In line with the requirements of the fore-mentioned supplementary planning guidance, ten square metres of amenity space should be provided for each child. To accommodate the predicted child occupancy level the applicant should deliver a requirement for a little over 1,000 sq.m. of play space which is accommodated in the scheme.

31 The applicant has addressed the pre-application advice and has produced a landscape play zones drawing which contains details of the proposed play equipment on the various playspace zones proposed to be provided at the site. The Council should ensure that this provision is conditioned.

32 The application includes a public piazza which will provide a public open space area for use by the community between on the High Road entrance. The change in level at the site has enabled the creation of defined landscaped zones which can be used by the commercial units and visitors. A water feature is proposed in the mid- section of landscaping following the piazza to provide a sense of separation between the public and private areas of the piazza. The applicant also proposes a bridge feature for access into the private residential court which can be gated to restrict access. It is within the residential landscape proposals that the playzones feature allowing for security and a sense of belonging.

33 The application proposes for all residential units to have private amenity in the form of balconies, terraces or gardens, complying with the minimum standards for balcony sizes as set out in the Housing SPG, which are supported. However the applicant should consider the comments provided in the design section regarding the balcony materials.

Inclusive access

34 Overall, a total of 25 or 10% of homes will meet wheelchair accessible/adaptable standards. The layouts appear to meet the standards and there is a general commitment to delivering a scheme in accordance with Policy 7.2 of the London Plan.

35 London Plan table 6.2 'car parking standards' states that adequate car parking must be provided for disabled people preferably on site. The draft Housing SPG also confirms that 'each designated wheelchair user dwelling should be allocated a designated parking space in line with Standard 3.3.2 and the Accessible London SPG'. Therefore the 16 accessible parking bays being proposed are not sufficient and should be 25. This matter is addressed in detail within the transport section below.

36 GLA offices also have a concern about the lifts on the residential gardens. It would be preferable for these to be within the building structure to ensure better reliability.

37 Amendments to these matters will ensure that the proposal achieves the highest standards of accessibility and inclusion.

Urban design

38 The proposed layout of the scheme is broadly supported and is designed to optimise active frontage to commercial units along the site's northern edge along High Road, which is welcomed. The scheme now has a reduced building height from the previous 13 and 10 storeys at the High Road frontage to 10 and 8. Blocks A and B are 8 and 9 storeys respectively and blocks C is 10 storeys dropping to 8 for blocks D and E.

Housing quality

39 In compliance with London Plan Policy 3.5, the proposal has a high residential quality with 5-8 units per core and 2.6m floor to ceiling heights. The scheme has no north facing single aspect units and each block has an entrance to each circulation core however some clarification is required to demonstrate the access routes into the core of block E. Paragraph 2.2.10 of the Town Centres SPG and Baseline Standard 3.1.1 of the Housing SPG are particularly relevant to the entrance arrangements.

40 A bin store has been redesigned to introduce a curved wall on the south eastern corner, which is supported.

41 The commercial units are located at the three edges of the front facing High Road, allowing for active frontages as per the requirements of the WAAP. The treatment of these commercial units could be conditioned by the Council to avoid blank or closed off frontages to these units at any point.

42 The school site has been defined with a separate access route which is supported and is parallel to the residential gardens in the scheme. However further clarity is required along the eastern edge as this is defined as a public route. The applicant should clarify how this area will be safe and inclusive and what the route is to the residential core to the rear which appears to be very lengthy for a resident to be entering the site from the High Road. A larger plan of the various neighbouring uses and their public routes of access and separation should be provided to demonstrate how the southern tip units will be integrated to avoid the risk of them becoming isolated.

43 The applicant should clarify the materials and glazed balconies proposed to avoid privacy issues given their proposed overhanging nature.

44 Overall, the design of the scheme and high residential standards are supported. The applicant should address the matters in relation to access routes and entry to the most southern blocks. Clarification of the building materials proposed for the balconies should also be provided before stage 2.

Energy

45 In terms of energy efficiency, a range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include low energy lighting and mechanical ventilation with heat recovery.

46 The demand for cooling will be minimised through blinds, solar control glazing and green roofs. A dynamic overheating modelling exercise has been undertaken following CIBSE TM52 methodology. The results provided show that the CIBSE requirements will be met for the sample models.

47 The development is estimated to achieve a reduction of 9 tonnes per annum (3%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development.

48 In terms of district heating, the applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. The site is located in a district heating opportunity area and the applicant has been in contact with the local borough officer to determine whether there are any connection opportunities in the area, this is welcomed. The applicant has provided evidence of correspondence with the officer confirming that there is not currently a heat network in the area. The applicant has, however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

49 The applicant is proposing to install a site heat network connecting all apartments and non-domestic building uses. The site heat network will be supplied from a single energy centre. This will be 170 sq.m. in size and located in the basement area.

50 In terms of combined heat and power (CHP), the applicant is proposing to install a 70 kW_e gas fired CHP unit as the lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load, as well as a proportion of the space heating. A reduction in regulated CO₂ emissions of 62 tonnes per annum (21%) will be achieved through this second part of the energy hierarchy.

51 The applicant should provide further information on the management arrangements proposed for the system, including anticipated costs, given that the management and operation of small CHP systems can significantly impact their long term financial viability.

52 In terms of renewable energy, the applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 64kW_p roof mounted Solar Photovoltaic (PV) array. A roof layout drawing has been provided.

53 A reduction in regulated CO₂ emissions of 25 tonnes per annum (8%) will be achieved through this third element of the energy hierarchy.

54 A reduction of 96 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 35%.

55 The on-site carbon dioxide savings fall short of the targets within Policy 5.2 of the London Plan. While it is accepted that there is little further potential for carbon dioxide reductions onsite, in liaison with the borough the developer should ensure the short fall in carbon dioxide reductions, equivalent to 9 tonnes of CO₂ per annum, is met off-site.

56 The applicant has broadly followed the energy hierarchy. Sufficient information has been provided to understand the proposals as a whole. Further revisions and information are required before the proposals can be considered acceptable and the carbon dioxide savings verified.

Flooding

57 The development proposals comply with London Plan policy 5.12. Whilst many sustainable drainage measures are offered as suggestions, the detailed drainage arrangements have yet to be made to determine compliance with London Plan policy 5.13.

58 The Flood Risk Assessment prepared by Herrington Consulting confirms that the 0.8ha site is within Flood Risk Zone 1 and there is no significant risk of surface water flooding. The proposals therefore comply with London Plan policy 5.12. However, there are areas of surface water flood risk in the near vicinity.

Drainage

59 The FRA suggests a series of drainage measures to reduce run-off to a greenfield rate with restricted flows to the public surface sewer system, including:

- Reducing the area of impermeable surface (via permeable paving);
- Green roofs;
- Rainwater harvesting
- Swales
- Rain gardens; and
- Underground storage.

60 However, there are no detailed proposals available and infiltration tests have not been conducted to determine whether permeable paving as an infiltration technique will be appropriate. The detailed drainage arrangements should be agreed by the Brent Council Lead Local Flood Authority via an appropriate planning condition.

Transport

61 Given the site's location within the Wembley Opportunity Area, the WAAP identifies a number of aspirational transport improvements, such as the upgrade of three railway stations, the implementation of a bus strategy and improvement to cycle and pedestrian infrastructure.

Car Parking and Access

62 In considering the access arrangements proposed, TfL expects the applicant to demonstrate that a vehicle (ideally the largest intended to enter the site, proposed to be a 12m lorry) can wait off the public highway whilst the entrance gates swing open, to protect pedestrian safety and amenity on this busy high street. Access details are therefore requested before confirming their acceptability.

63 The number of proposed car parking provision has been reduced from the 40 spaces proposed at pre-application stage, to just sixteen spaces; all designed for Blue Badge use. This is strongly supported by TfL as it will minimise road/bus congestion and encourage the use of more sustainable transport modes. It nevertheless notes that this level of disabled parking does not represent the 1:1 provision recommended in the London Plan for 'wheelchair units' of which twenty five are proposed.

64 TfL also recommends that at least one of the parking spaces should be allocated for disabled staff use in regard to the commercial component. The applicant is committed to an undertaking a car-and-permit-free agreement and to the provision of electric vehicle charging point (ECVP) provision according to London Plan standards. This is welcomed by TfL.

65 Furthermore, 412 cycle parking spaces are to be provided at ground and lower-ground floors, which is compliant with the London Plan standards; this total includes 20 long-stay spaces for the commercial uses, in a separate store. Shower and changing facilities are identified on the plan for each commercial unit, which is welcomed. However, the applicant's intention that "visitor parking will be specified at ground floor" cannot be supported until a firm commitment is given either in writing or on a plan to devote the necessary space for short term (visitor) cycle storage required. This is also expected to be provided in a convenient and accessible location as per by the London Plan. Furthermore, it is also unclear how cyclists will access the parking off the street (High Road) and what their route is through the site (using level access), and this should be addressed.

66 Revisions to the plans in respect of cycle access and visitor spaces are therefore required. Notwithstanding this, the applicant is expected to submit details of all cycle parking, to be secured by condition, for consideration by the Council. Any cycle provision proposed on site needs to be safe, covered and secure with good lighting and CCTV.

Walking, Cycling, Public Realm

67 The proposed building line is to be set back from the High Road to allow more generous footways in front of the site and one of the two existing crossovers will be removed and restored to pavement. TfL accepts that this is a benefit to pedestrian amenity and safety, though it remains unclear whether any extra footway width gained along the High Road will be adopted by the local Highway Authority, which would be recommended by TfL.

68 No mention is also made to helping realise the Council's aspiration in promoting Wembley as an area suitable for a Cycle Hub. TfL would support the Council in seeking a contribution towards delivering this. TfL recommends a contribution towards signposting for the local area indicating any routes through the site; it notes that 'Legible London' signage is already provided in the area.

69 At pre-application stage, TfL requested the applicant to establish how the access road into the schools site at the rear could be utilised to provide further permeability into the site and encouraged it to demonstrate the nature of this route, with the aim of providing a safe and accessible link. Regrettably, this has not been followed within the submission materials and TfL would expect this to be addressed by assessing the conditions for pedestrians and cyclists to and within the site in line with London Plan policy 6.10. A more detailed review and better quality information to demonstrate the desired added connectivity, safety and attractiveness of pedestrian/ cycle routing is therefore required.

Trip Generation, Modal Split and Highway Impact

70 The applicant has adequately assessed the trip generation of this development and notwithstanding the comments made above on access, TfL accepts that car traffic generation will be significantly reduced in comparison to the site being reused as offices or indeed the vacant site's last use (155 existing car parking spaces) and TfL is therefore satisfied that the development is unlikely to impact upon the operation of the adjacent highway.

71 The modal split in Table 6.2 varies somewhat from what TfL would expect from this area given Brent Council is seeing exceptional growth on its bus network. TfL notes that proportion of trips assigned to rail is rather high at 13% (when such services stop relatively infrequently), conversely the proportion assigned to buses (37%) would be expected to be higher. Furthermore, in accordance with guidance and policy on transport impact assessment it requires that the applicant considers in its supporting information the cumulative impacts of other developments in the Wembley High Road area (the Council should be able to assist with identifying these developments).

Public Transport Impact

72 TfL considers that the impact on tube and rail services is unlikely to be significant; however it is concerned about the implications for local bus services. A conservative 47 two-way additional bus demand in the morning peak is expected from the development, which is considered to be a significant amount.

73 TfL is in the process of finalising with Brent Council a bus strategy for Wembley in order to cater for the growth anticipated in the Opportunity Area. Although a bus corridor study is about to be undertaken, TfL is of the view that developments will need to contribute potentially through pooling contributions, towards bus capacity enhancements to accommodate the cumulative impact of developments in the area.

74 While the development currently benefits from being served by a high frequency bus corridor, all of the routes (with the exception of Route 92) are currently operating at capacity in the Wembley area. Routes 18 and 223 terminate nearby and are thus irrelevant to the likely additional demand generated by the site. For routes 83, 182 and 204 demand outstrips planning capacity and with further developments coming forth from the WOA, this is forecasted to continue and be exacerbated.

75 TfL requires further discussion with the applicant to identify and agree an appropriate bus contribution, which will help to deliver the aims of the emerging bus strategy and London Plan policy 6.7 Better Streets and Surface Transport. Furthermore, no audit of bus stop condition and suitability for disabled use is given in the transport assessment (TA), this should be rectified.

Servicing, Deliveries and Construction

76 The great majority of servicing, for both the residential and commercial units, will be undertaken within the curtilage of the site at both ground floor level and lower ground floor level, which is welcomed. The applicant needs to demonstrate that the turning movements can take place with minimal interference with pedestrian and cycling desire-lines or formal routes on-site. It is noted that there will be a "Goods in Manager" on-site. A delivery and servicing plan (DSP) is contained in the TA and a detailed plan should be conditioned for approval closer to the time of implementation. No mention has been made of construction logistics and managements; although no construction logistics plan (CLP) is supplied TfL is content on this occasion to receive the details for approval post-consent, subject to a condition imposed by the Council.

Travel planning and construction

77 The application is supported by framework travel plans for the residential and for the commercial uses, both have passed TfL's ATTrBUTE test. Full Travel plans for the residential use plus the commercial use should also be secured, enforced, monitored, reviewed and funded through the section 106 agreement in accordance with London Plan policy 6.3.

CIL

78 In accordance with London Plan policy 8.3, Community Infrastructure Levy, the Mayor agreed to commence CIL charging for developments permitted on or after 1 April 2012. It is noted that the proposed development is within the London Borough of Brent, where the Mayoral charge is £35 per square metre Gross Internal Area (GIA). The levy will raise £300 million towards the delivery of Crossrail. Further details can be found at:
<http://www.london.gov.uk/publication/mayoral-community-infrastructure-levy>.

Summary

79 TfL supports the principle of the application and in particular its potential improvements to amenity, safety and connectivity for pedestrians and cyclists, though more information is requested. A number of issues and queries are highlighted in this report, particularly in the context of bus capacity and cumulative impacts of development in this growth area, but also visitor cycle parking provision, walking and cycling routing, gating access, a contribution towards Legible London, and disabled parking distribution across land uses. These must be adequately addressed before the application can be deemed to be acceptable in transport terms and referred back to the Mayor.

Local planning authority's position

80 The Council is currently awaiting the full set of consultation responses on this proposal and so the general position stated in this section is an officer opinion and may be the subject of change depending on issues which may come to light later on. Affordable Housing is currently the subject of an independent review. In terms of design, scale and massing the approach is generally considered to be acceptable by the Council and the 'kink' in the building is considered to be an effective way of helping to break down the scale of the larger block. The heights proposed are viewed as appropriate in the context of neighbouring Elizabeth House, and other surrounding buildings, subject to further testing of impacts on existing neighbouring buildings. The Council consider the new public piazza could be a real public realm benefit although it has some reservations about the new trees being proposed, and this is something it proposes to work through with the applicant to secure better (larger) specimens to compensate for what would need to be taken out. In terms of energy savings, the Council has also noted the applicant's shortfall in meeting the 35% Part L 2013 baseline and is proposing to secure a carbon off-set if this is not met.

Legal considerations

81 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, or 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 purpose of determining the application (the next bit is optional) and any connected 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.

Financial considerations

82 There are no financial considerations at this stage.

Conclusion

83 London Plan policies on **housing, affordable housing, mix, design, inclusive access, climate change- energy and flood risk, and transport** are relevant to this application. Whilst the application is broadly acceptable in strategic planning terms, further discussion and changes are required regarding the following issues:

- **Housing/affordable housing:** The results of the independent assessment of affordable housing provision should be shared with GLA officers demonstrating the maximum reasonable amount of affordable housing is being secured at the site. Consideration should be given to housing mix and number of 1 bed units in the private provision.
- **Design:** The overall approach to the layout, height and massing and the residential quality is supported. However, the minor matters raised above need some clarification before stage 2.
- **Inclusive access:** Consideration should be given to the number of blue badge parking spaces and lift access from the gardens as detailed within the report to make it policy compliant.
- **Climate change/energy:** The applicant has broadly followed the energy hierarchy. Sufficient information has been provided to understand the proposals as a whole. Further information is required before the final proposals can be understood. The short fall in carbon dioxide reductions, equivalent to 9 tonnes of CO2 per annum, should be met off-site or by payment which is the action proposed by the Council.
- **Sustainable drainage:** The drainage measures proposed for the site require consideration as per above and will need to be secured by the Council by way of condition.
- **Transport:** The proposal is considered to be potentially acceptable from a strategic transport perspective. However to ensure the application complies fully with London Plan transport policies, the various matters raised above should be addressed and the various S106 agreements and/or conditions be secured by the Council.

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