

**Apex House, Fulton Road and Albion Way, Wembley****in the London Borough of Brent****planning application no. 15/4708****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**

Full planning permission is being sought for the demolition of the existing buildings and redevelopment of a part 9, part 10, and part 27 storey building comprising 521 student accommodation units with associated ancillary facilities at ground floor level, landscaping works, and cycle parking spaces, plus a 49sq.m. cafe for public use.

**The applicant**

The applicant is **Tide Construction Ltd** and the agent is **HTA Design**.

**Strategic issues**

The principle of student housing in this highly accessible location is supported in strategic planning terms. However, further information and discussion is required on **principle of development, urban design, inclusive access, sustainable development** and **transport** to ensure compliance with London Plan policies.

**Recommendation**

That Brent Council be advised that while the application is generally acceptable in strategic planning terms, the application does not yet comply with the London Plan, for the reasons set out in paragraph 75 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

**Context**

1 On 21 December 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 29 January 2016 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 Category 1C of the Mayor of London Order 2008:

- *1C “Development which comprises or includes the erection of a building of (c) 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](http://www.london.gov.uk).

## **Site description**

5 The 0.188 hectare site is located on Fulton Way, situated on the corner of Fulton Road and Albion Way in Wembley. Fulton Road runs along the south of the site and Albion Way to the east. To the north of the site is the recently completed Karma House which comprises approximately 450 student rooms. To the west of the site is Pinnacle Tower (formally Shubette House), completed in 2012, which is a mixed-use development comprising residential, retail and a hotel and fronts on to Olympic Way.

6 The site is currently occupied by a two storey building which is used as a car repair garage and a bakery/cafe. Car parking is currently provided along Albion Way out the front of the existing building.

7 The site is located within the Wembley Opportunity Area and the Wembley Masterplan area. The Wembley Area Action Plan (WAAP) also identifies the site as being within the Strategic Cultural Area where leisure, tourism and cultural uses are particularly encouraged. As part of the opportunity area there are a number of aspirational transport improvements that have been identified, such as the upgrade of the three railway stations, the implementation of a bus strategy and improvement to cycle and pedestrian infrastructure.

8 The site records a public transport accessibility level (PTAL) of 5, on a scale of 1 to 6b, where 6b is the most accessible. Six buses currently serve the site (83, 92, 182, 206, 223 and 297) and stop approximately 300 to 500 metres from the site at Wembley Park Station, Engineers Way and Wembley Park Drive. These buses operate at a frequency of 6.7 buses per hour.

9 The nearest London Underground station is Wembley Park, located approximately 375 metres north of the site. The station is served by the Jubilee and Metropolitan lines providing a frequent service in and out of central London.

## **Details of the proposal**

10 The proposal is for a full planning application for the demolition of the existing building to provide a part 9, part 10 and part 27 storey building, which will comprise 521 student accommodation units. Associated ancillary facilities at ground floor, which include common rooms, games room/study area, entry lobby/lounge, gym, cinema room and a laundry. Landscaping works will be undertaken as well as the provision of cycle parking spaces and a 49sq.m. cafe that will be available for public use.

## Case history

11 There was no pre application meeting held with the GLA regarding this proposal. It is understood by GLA officers that the applicant has had pre application meetings with planning officers at Brent Council.

## Strategic planning issues and relevant policies and guidance

12 The relevant issues and corresponding policies are as follows:

- Principle of development *London Plan*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Tall buildings/views *London Plan, London View Management Framework SPG*
- Inclusive Access *London Plan; Accessible London: achieving an inclusive environment SPG*
- Sustainable development *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*
- Transport *London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG*

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 (2010); Site Specific Allocation DPD (2011); Draft Development Management policies DPD; and 2015 the London Plan (Consolidated with Alterations since 2011).

14 The following are also relevant material considerations:

- National Planning Policy Framework and the accompanying National Planning Practice Guidance.
- The draft Minor Alterations to the London Plan (2015).
- The Wembley Area Action Plan (2015).

## Principle of development

### Loss of existing light industrial accommodation

15 The site is located in the Wembley Opportunity Area. Policy 2.13 'Opportunity Areas and Intensification Areas' and Table A1.1 of the London Plan identify the Opportunity Area for a minimum of 11,500 new homes and indicative employment capacity of 11,000, and seeks to better integrate the world-class stadium and other facilities with the surrounding development context. Development should contribute to the regeneration, vitality and viability of Wembley as a town centre. Proposals in the Opportunity Area should enhance permeability and connectivity to the wider hinterland. Development within this area should also exceed minimum guidelines for housing and employment requirements, should maximise public transport access, deliver social and economic inclusion and promote high quality design.

16 The Wembley Area Action Plan (WAAP) identifies the development site as an area that can benefit from higher densities and is suitable for hotel or residential development, provided commercial uses are located at the ground floor. Policy 2.16 and Tables 2.1 and A2.1 of the London Plan identify Wembley as a town centre with the potential to develop strategic functions in leisure/tourism/arts/culture/sports.

17 Given the above, and the low quality of the existing industrial building on site, the principle of the loss of industrial accommodation does not raise any strategic planning concerns.

#### Student housing

18 London Plan policy 3.8h states that strategic and local requirements for student housing meeting a demonstrable need are to be addressed by working closely with stakeholders in higher and further education and without compromising capacity for conventional homes.

19 The London Plan recognises in paragraph 3.52 that London's universities make a significant contribution to its economy and labour market and that it is important that their attractiveness and potential growth are not compromised by inadequate provision for new student accommodation. Paragraph 3.52 recognises the demand for student accommodation and states that there could be requirement for some 20,000 to 31,000 places over the years 2015 to 2025. It also recognises that the provision of purpose-built student housing may reduce pressure on other elements of the housing stock currently occupied by students, especially the private rented sector. The SHLAA/HCS has identified capacity for over 20,000 student places 2015-2025.

20 Paragraph 3.53 sets out that addressing the demands for student accommodation should not compromise the capacity to meet the need for conventional dwellings, especially affordable family homes, or undermine policy to secure mixed and balanced communities. It recognises that this may raise particular challenges locally and especially in parts of inner London where almost three quarters of the capacity for new student accommodation is concentrated. Student accommodation should be secured as such by planning agreement or condition relating to the use of the land or to its occupation by members of specified educational institutions. If the accommodation is not robustly secured for students, it will normally be subject to the requirements of affordable housing policy.

21 The applicant has not provided any evidence of agreement with an educational institution to take up the student accommodation proposed. As such, if there is no undertaking with a specified academic institution(s), the applicant should, subject to viability, deliver an element of student accommodation that is affordable for students in the context of average student incomes and rents for broadly comparable accommodation provided by London universities, in line with paragraph 3.53B of the London Plan. The viability assessment should be independently assessed by Council and shared with GLA officers.

22 The principle of providing student accommodation in this highly accessible town centre location is supported in strategic planning terms. However, given the quantum of student accommodation that has been located within the vicinity of the development site and in accordance with London Plan Policy 3.8 'Housing Choice' the applicant should submit a student accommodation demand assessment to demonstrate that there is sufficient need for additional rooms in this location. The WAAP states that student accommodation developments will not be allowed once the total number of approved student bedrooms exceeds 20% of the projected increase in population in the Wembley Growth Area, and acknowledges that a number of major planning proposals in recent years have involved student accommodation that would provide some 2,600 student bedrooms if all are implemented. Whilst the proposal will not exceed the 20% of the projected increase in population, there have been several approvals for student accommodation within the neighbouring context and Brent Council should be satisfied that this additional accommodation will not put pressure on any existing services or facilities.

23 The indicative accommodation schedule is outlined in the table below.

Type	Number of rooms	Percentage of rooms
Cluster rooms (with 4 – 6 units)	229	44%%
Studios	240	46%
Studios – Wheelchair	50	9.6%
2 bed studio rooms	2	0.4%
<b>Total</b>	<b>521</b>	<b>100%</b>

## Urban design

24 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 7 which address both general design principles and specific design issues. London Plan Policy 7.1 sets out a series of overarching design principles for development in London. Other design policies in this chapter and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage, views, and public realm. New development is also required to have regard to its context, and make a positive contribution to local character within its neighbourhood (Policy 7.4).

25 London Plan Policy 7.7, which relates to the specific design issues associated with tall and large-scale buildings, is of particular relevance to the proposed scheme. This policy sets out specific additional design requirements for tall and large-scale buildings, which are defined as buildings that are significantly taller than their surroundings and/or have a significant impact on the skyline and are larger than the threshold sizes set for the referral of planning applications to the Mayor. Policies 7.10 and 7.11, which set out the Mayor's approach to protecting the character of strategic landmarks as well as London's wider character, are also important considerations.

### Layout

26 The applicant is intending to provide an 'L' shaped floorplan which has resulted in a simple form that responds well to the site and the adjacent developments. The ground floor plan is well considered, with the entrance foyer, office provision, communal area, game room, study area and cafe placed to ensure an active and overlooked public realm. Particular attention has been paid to ensuring frontages along Fulton Road are activated with the placement of the cafe unit here and any uses that would create inactive frontages have been placed along Albion Way which is supported. The entrance foyer has also been recessed behind a colonnade which will widen the pavement and provide a more adequate public realm area along Fulton Road and Albion Way.

27 The provision of a central courtyard is supported and provides amenity space for the students. The landscape strategy for this communal space will ensure the space is utilised and is supported by GLA officers.

28 The 'L' shaped floorplate allows for efficient clustering of student rooms onto three separate wings with a central tower element that also provides a single core in the centre. This is welcome.

## Height and massing

29 Tall buildings will be acceptable in a limited number of locations within the WAAP area, where they can demonstrate the highest architectural quality. The site is designated as a 'sensitive' area in the WAAP which specifies that these areas may have some scope for a tall building, but due to adjacent properties, site assembly or location of the site will require further work to establish an appropriate form of development. It is acknowledged that the site is located within an area where tall buildings have been developed, and would add to the cluster effect of these tall buildings. Notwithstanding this, the site is relatively small and the proposed building height is taller than the surrounding context. Given this, the design of the building would be expected to be of outstanding quality.

30 The massing of the building, with a tower element and two plinths is supported and ensures the building relates well to the surrounding context. The two plinths relate to the adjacent development and help to create an urban block.

31 The applicant has proposed glass reinforced concrete (GRC) as the predominant cladding material with variations in colour palette to distinguish between the three elements of the building and to provide appropriate transition to the adjacent buildings. The tower element will also be clad in aluminium panels which creates varied texture and vertical proportions. The Fulton Road frontage will be clad in GRC and terracotta planks and the Albion Way frontage will be clad in GRC and porcelain planks. Both these frontages are recessed from the building line of the tower which provides distinction between the two plinths and the tower element.

32 The approach to the height, massing and material palette is supported by GLA officers and will provide a high architectural quality that is appropriate for a building of this height. Notwithstanding this, the final choice of material and quality of detailing is critical to ensuring the final design is appropriate, and as such the local authority will need to scrutinize this carefully. The applicant should also include a clause in the section 106 agreement that will ensure the same calibre of architects are retained to produce all construction drawings, or a budget is allocated to allow them to review these when they are produced.

## **Inclusive access**

33 The aim of London Plan Policy 7.2 'An Inclusive Environment' is to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum). Inclusive design principles, if embedded into the development and design process from the outset, help to ensure that all of us, including older people, disabled and Deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity.

34 The design of the landscaping and the public realm is crucial to how inclusive the development is for many people. The applicant should confirm that the site is accessible for people of all abilities. The proposal should ensure that the routes from public transport facilities to the new entrances are legible and clearly identifiable, and that way finding is clear to make access easy, safe and comfortable. The Design and Access Statement should provide details regarding levels, gradients and surface materials of paths and how they are providing segregation from traffic and turning vehicles, and how many level changes in the routes will be addressed.

35 The applicant has indicated that wheelchair access to the courtyard will be provided off Albion Way. This ramp will also provide access to the bin store. The applicant should provide details of the gradient of this ramp and the impact on any wheelchair users when the bins are being moved to Albion Way for collection. The applicant should also provide details on where the bins will be collected from as the ramp is the only method of access to the courtyard for wheelchair users and the entrance to the ramp should not be restricted at all.

36 The applicant has indicated that there will be 50 studio units that will be wheelchair accessible, however it is disappointing that the applicant is only intending to provide these in studio wheelchair units and has not provided any wheelchair units in the cluster rooms. Wheelchair accessible units should be distributed across unit sizes to afford similar choices to disabled and non-disabled people. The applicant should include typical flat layouts and plans of the wheelchair accessible or easily adaptable units in the design and access statement.

## **Sustainable development**

### Energy

37 The applicant has broadly followed the energy hierarchy. Sufficient information has been provided to understand the proposals as a whole. The proposals are broadly acceptable; however, further information is required before the carbon savings can be verified.

### Energy efficiency standards

38 A range of passive design feature 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. The building will be constructed to high thermal performance levels in order to achieve an efficient and airtight envelope which will result in minimised heat losses. The demand for cooling will be minimised through natural ventilation and manually operated blinds providing for solar shading.

39 The applicant has provided the results of initial internal thermal modelling to assess risk of overheating. These results indicate the student accommodation rooms pass, while that the tower kitchen fails TM52 criteria when relying on natural ventilation only. The applicant should provide evidence that further passive measures and mechanical ventilation will be applied to resolve this issue.

40 Ground floor communal areas such as the common room, reception, office and cinema are proposed to have a VRV system (multi-zone air conditioner) that provides both heating and cooling. The applicant should investigate further passive measures to minimise demand for mechanical cooling in the ground floor common areas as these were not subject to the modelling and were shown to fail solar gain checks in the submitted summary energy monitoring reports.

41 The development is estimated to achieve a reduction of 52 tonnes per annum (6.59%) in regulated CO<sub>2</sub> emissions compared to a 2013 Building Regulations compliant development.

### District heating

42 The applicant has identified that the site is located within the Wembley district heating opportunity area and provided evidence of investigation using the London Heat Map tool. The applicant has stated that Brent Council sees a significant risk and a need for substantial viability testing in pursuing a district heating solution for Wembley. Correspondence with Brent confirming that this statement reflects the Council's latest position regarding the provision of a Wembley district heating network should be provided.

43 The applicant has provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

44 The applicant has stated that student rooms and non-domestic building uses would be connected to the site heat network and that the site heat network will be supplied from a single energy centre. The applicant should investigate the opportunity for connecting the ground floor common areas to the site heat network, potentially avoiding the need for VRV system for heating in these areas. A diagram showing the proposed layout and size and the energy centre route of the heat network linking all buildings on the site should be provided.

#### Combined heat and power

45 The applicant is proposing to install combined heat and power (CHP). The CHP would be sized to provide the domestic hot water load with backup gas boilers to meet the maintenance loads when the CHP is offline and to provide the heating load in the winter months. A proportion of the hot water created will be stored in a tank in the plant room to enable the CHP to be sized to meet the demand.

46 The applicant has stated that detailed design and feasibility of the CHP element will be carried out at the detailed design stage. The applicant is required to provide further details of the CHP proposed. Detailed information should be provided including the size of the engine proposed (kWe/kWth), the thermal store size and suitable monthly demand profiles for heating, cooling and electrical loads. The applicant should confirm that plant efficiencies used when modelling carbon savings are gross value rather than the net values often provided by manufacturers.

47 A reduction in regulated CO<sub>2</sub> emissions of 203 tonnes per annum (25.95%) will be achieved through this second part of the energy hierarchy however the information requested above needs to be provided to confirm this.

#### Renewable energy technologies

48 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install roof mounted photovoltaic panels (PV).

49 The applicant has provided an estimate that a maximum area of 300sq.m. of PV could be installed. The applicant should provide a roof plan demonstrating that this area of PV can be accommodated. Shading analysis should include an assessment of the height of existing buildings and any permissions granted for buildings near the application site.

50 A reduction in regulated CO<sub>2</sub> emissions of 25.02 tonnes per annum (3.19%) is anticipated to be achieved through this third element of the energy hierarchy.

#### Overall carbon savings

51 Based on the energy assessment submitted at stage 1, the table below shows the residual CO<sub>2</sub> emissions after each stage of the energy hierarchy and the CO<sub>2</sub> emission reductions at each stage of the energy hierarchy.



	<b>Total residual regulated CO<sub>2</sub> emissions</b>	<b>Regulated CO<sub>2</sub> emissions reductions</b>	
	<b>(tonnes per annum)</b>	<b>(tonnes per annum)</b>	<b>(per cent)</b>
Baseline i.e. 2013 Building regulations	783.29		
Energy Efficiency	731.69	51.59	6.59%
CHP	528.45	203.25	25.95%
Renewable energy	503.43	25.023	3.19%
<b>Total</b>		279.86	35.73%

52 A reduction of 279.86 tonnes of CO<sub>2</sub> per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 35.7%.

53 The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan.

#### Flood risk

54 A Flood Risk Assessment (FRA) has been undertaken by Peter Brett Associates. The FRA confirms that the majority of the site is within Flood Zone 1, with the north east corner of the site within Flood Zone 2. The FRA also confirms that the site is within a critical drainage area and the FRA states that the ground floor has a minimum of 400 millimetre freeboard above the EA's predicted 1 in 100 year flood level.

55 The application proposes approximately 13 of the student units (i.e. sleeping accommodation) will be located at basement level, i.e. below the modelled flood levels. The FRA confirms that despite the Environment Agency fluvial and surface water flood risk mapping indicating that any basement accommodation would be vulnerable to flooding, the basement level accommodation is hydraulically separated from any wider fluvial or surface water flood risks by higher ground on Fulton Road and Albion Way.

56 The FRA also confirms that there will be internal access from the basement accommodation to upper floors in the event of any flooding.

57 Given this confirmation, the proposals are acceptable in principle and considered to comply with London Plan Policy 5.12.

#### Sustainable drainage

58 There are significant surface water flood risks within the immediate vicinity of the site. Therefore the application of London Plan Policy 5.13 will be an important consideration for this site.

59 The approach to sustainable drainage is to reduce discharge by 50% compared to the existing situation. This is acceptable in terms of London Plan Policy 5.13 and should be secured via a suitable planning condition to be discharged by Brent Council's Lead Local Flood Authority.

## Climate change adaptation

60 Brent Council should secure through planning condition that the application responds to strategic policies regarding climate change adaptation, including use of low energy lighting and energy efficient appliances, metering, high levels of insulation, low water use sanitary-ware and fittings, in addition to biodiverse roofs.

## **Transport**

61 TfL requests that the applicant clarify whether 262 or 206 cycle parking spaces will be provided as part of the proposal. There appear to be discrepancies in the figures presented in the submitted documents. According to the standards defined in the London Plan Policy 6.9, a minimum of 262 long stay and 13 short stay cycle parking spaces should be provided for a development of a similar number of beds/units. The London Cycle Design Standard (LCDS) also recommends that 5% of stands ought to be able to accommodate larger cycles. This should be included.

62 The proposal does not mention the location for short stay cycle parking, this should be clarified.

63 TfL recommends that the applicant considers alternative access to the bike store through the ramp in the north-east corner of the site (access to the bin store). This would improve the accessibility and will give users more options to access/egress the facility.

64 While the development benefits from being served by a high frequency bus corridor, the local bus network is currently operating at capacity in the Wembley area.

65 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, in line with London Plan Policy 6.7, towards bus capacity enhancements to accommodate the cumulative impact of developments in the area.

66 Given the location and nature of the proposals, it is critical that this and other developments in the area help improve the safety and attractiveness of the pedestrian and cycle environment. Therefore TfL would support Brent Council in seeking appropriate funding for its improvement schemes here and in the WAAP, to be secured through the section 106 agreement. TfL requests that a full pedestrian or PERS audit is undertaken, providing conclusions and recommendations based on the findings. It is considered that the assessment should, as a minimum, cover the immediate streets leading to the site, routes to Wembley Park station as well as the bus stops located in the immediate surroundings.

67 It is recommended that the applicant provides a cycling accessibility assessment, following the methodology explained in LCDS Chapter 2, section 2.3.4. This should also include an assessment of junctions in a buffer of 500 metres from the site. This will inform which improvements could be made to provide a safer access to cyclists.

68 TfL requests that the applicant provides a minimum of one Blue Badge Parking space on site. If this is not deemed possible by the applicant, then TfL would expect a robust justification. If this requirement cannot be provided on site, an alternative location will have to be sought for the provision of a space(s).

69 TfL has reviewed the submitted Travel Plan using the ATTrBuTE tool and is satisfied that it has passed the assessment subject to the applicant providing additional information on how it will be secured with Brent Council by planning obligations.

70 TfL expects that a draft Delivery and Servicing Plan (DSP) is submitted with proposals of this nature; this should be secured by planning condition. This will ensure compliance with London Plan Policy 6.14. TfL expects the development to be supported by a Construction Management Plan (CMP) and a Construction Logistics Plan (CLP). Both of these plans should be secured by condition and/or through the section 106 agreement as appropriate and should accord with TfL guidance.

71 In accordance with London Plan Policy 8.3, 'Community Infrastructure Levy', and following consultation on both a Preliminary Draft, and then a Draft Charging Schedule, the Mayor's CIL came into effect on 1 April 2012. The proposed development is within the London Borough of Brent where the Mayoral charge is £35 per square metre gross internal area.

## **Local planning authority's position**

72 It is understood by GLA officers that Brent Council is likely to report this application to its planning committee in March 2016.

## **Legal considerations**

73 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 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**

74 There are no financial considerations at this stage.

## **Conclusion**

75 London Plan policies on housing, urban design, inclusive access, sustainable development and transport are relevant to this application. In general the scheme is supported in strategic planning terms. However, further information and discussion, as stated below, is required to ensure the proposal complies with the London Plan:

- **Principle of development:** Given the sites location and the low quality of the existing industrial building on site, the principle of the loss of industrial accommodation does not raise any strategic planning concerns. The principle of providing student accommodation in this highly accessible location is supported in principle. However, Brent Council should be satisfied that the quantum of student housing proposed will not negatively impact on existing services and is appropriate on this site given the recent proposals for student accommodation within the immediate vicinity of the site. If there is no agreed undertaking with an educational institution to take up the student accommodation the applicant should deliver an element of accommodation that is affordable for students.

- **Urban design and tall buildings:** The 'L' shaped floorplate has resulted in a simple form and an efficient clustering of student rooms. The provision of communal amenity space for the students is also supported. The height and massing of the proposal is welcome and responds to the adjacent development. The applicant should also include a clause in the section 106 agreement that will ensure the same calibre of architects are retained to produce all construction drawings, or a budget is allocated to allow them to review these when they are produced.
- **Inclusive access:** The applicant should provide further details of how disabled people will access the building and courtyard space. It is disappointing that wheelchair units have not been provided in the cluster rooms. The applicant should provide typical room layouts for the wheelchair units.
- **Sustainable development:** Further information and discussion (detailed in the body of this report) are required before the proposals can be considered to be acceptable and the carbon dioxide savings verified. This should be submitted for assessment before the application is referred back to the Mayor. The proposal complies with London Plan policies 5.12 and 5.13. Conditions securing commitment for climate change adaption measures should be included within the application when it is referred back to the Mayor.
- **Transport:** Further information (outlined in the body of this report) regarding transport matters are required for assessment prior to the application being referred back to the Mayor.

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