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# Planning Statement

66 Cavendish Road, London, NW6 7XP

Iceni Projects Limited on behalf of  
Central & Suburban Properties Ltd  
and ANX Developments Ltd

September 2021

ICENI PROJECTS LIMITED  
ON BEHALF OF CENTRAL &  
SUBURBAN PROPERTIES  
LTD AND ANX  
DEVELOPMENTS LTD

**Planning Statement**  
66 CAVENDISH ROAD, LONDON, NW6 7XP

# CONTENTS

1. INTRODUCTION .....	2
2. FACTUAL BACKGROUND .....	6
3. PROPOSED DEVELOPMENT.....	11
4. PLANNING POLICY CONTEXT .....	13
5. PLANNING CONSIDERATIONS .....	18
6. CONCLUSION .....	27

# 1. INTRODUCTION

1.1 This Planning Statement has been prepared by Icení Projects Limited (“Icení”) in support of a planning application by Central & Suburban Properties Ltd and ANX Developments Ltd (the “Applicant”) for the demolition of the existing buildings and the redevelopment of the site to provide a new residential development on the land at 66 Cavendish Road, London, NW6 7XP (hereafter referred to as “the Site”).

1.2 The application is submitted to the London Borough of Brent (‘the Council’) as the determining planning authority under the Town and Country Planning Act 1990 (as amended) and the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended).

1.3 The description of the development is as follows:

*Demolition of the existing building and the construction of a new part five, part six storey residential building, together with hard and soft landscaping, access, cycle parking and associated infrastructure.*

1.4 A more detailed description of the development proposed (hereafter referred to as the ‘Proposed Development’) is set out in Section 3 of this Statement. In summary, this application proposes the comprehensive redevelopment of the Site to provide a total of 1,915 sqm of residential floorspace, which comprises 21 new homes across the new part 5, part 6-storey building. The development also proposes associated cycle parking, amenity space, landscaping, and new tree planting.

1.5 This planning statement sets out the relevant planning background to the proposals, presents the application scheme, assesses the proposals against material planning considerations, and sets out how the proposals comply with the relevant planning policy context at local, regional and national level, as well as other material planning considerations.

1.6 The submitted application has benefitted from extensive pre-application discussions with the London Borough of Brent over a series of formal and informal meetings. This productive process has seen the design adapt and evolve and the Applicant is excited to now submit this application seeking planning permission for the proposed development.

## **Accompanying Documents**

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1.7 This Statement should be read in conjunction with the comprehensive suite of supporting plans and reports as agreed through pre-application discussions. These comprise the planning application submission, and includes:

**Table 1.1 Planning Documents**

<b>Document</b>	<b>Consultant</b>
Planning Statement	Iceni Projects
Application Form	Iceni Projects
Application Covering Letter	Iceni Projects
Design and Access Statement	Tigg and Coll Architects
Community Infrastructure Levy Forms	Iceni Projects
Financial Viability Assessment	James R Brown and Company
Daylight Sunlight Assessment	T16 Design
Air Quality Assessment	Redmore
Energy and Sustainability Statement	Doherty Energy
Flood Risk Assessment and Drainage Strategy	Civic Engineers
Transport Statement	Paul Mew Associates
Preliminary Ecological Appraisal	Philip Cave Associates
Tree Impact Assessment and Tree Protection Plan	Keen Consultants
Landscaping Plans and Information	Philip Cave Associates
Basement Impact Assessment	CGL
Plant Noise Assessment	KP Acoustics
Fire Statement	CHPK

**Table 1.2 Drawings, Prepared by Tigg and Coll Architects**

<b>Title</b>	<b>Reference</b>
Location Plan	491-PL-001
Existing Site Plan	491-PL-002
Existing Plans	491-PL-003
Existing Section AA	491-PL-0030
Existing Section BB	491-PL-0031
Proposed Lower Ground Floor	491-PL-101
Proposed Ground Floor	491-PL-102
Proposed First Floor	491-PL-103
Proposed Second Floor	491-PL-104
Proposed Third Floor	491-PL-105
Proposed Fourth Floor	491-PL-106
Proposed Roof	491-PL-107
Proposed Section AA	491-PL-300
Proposed Section BB	491-PL-301

## The Proposal

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1.8 The proposals are able to deliver a variety of positives from a social, economic and environmental perspective which weigh in favour of the scheme. Key positives of the Proposed Development can be summarised as follows:

- The delivery of a new purpose-built residential development in a sustainable location
- The delivery of much needed new housing for the borough, including the provision of a range of housing sizes, including 1, 2 and 3 bedroom homes suitable for a range of households, including families
- The delivery of a high-quality architectural building that responds to the site's context as a corner site, the recently approved development at 162 Willesden Lane and the prevailing character of the local area
- The provision of extensive areas of private and communal amenity space for occupants of the development
- The removal of low quality trees and the replacement with new, native tree species along the frontage of the site
- The removal of redundant vehicle crossovers and the provision of new high quality streetscape planting to the benefit of the local townscape and streetscape
- The delivery of a sustainable and energy efficient building that utilised energy efficient building fabric, green roofs and PV panels
- The delivery of a car free development with high levels of cycle parking, helping contribute to sustainable transport to and from the site.

## Structure of this Planning Statement

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1.9 The following sections of this planning statement are structured as follows:

- **Section 2** – Factual Background – sets out the factual background to the Site, surroundings and planning history.
- **Section 3** – Proposed Development – provides a detailed description of the proposed development

- **Section 4** – Planning Policy Context – provides a summary of the relevant planning policy context.
- **Section 5** – Key Planning Considerations – outlines how the proposed development responds to relevant planning policy, and other planning considerations.
- **Section 6** – Summary and Conclusions – provides a summary of this Planning Statement and confirms how the scheme accords wholly with the Development Plan.

## 2. FACTUAL BACKGROUND

### Site and Surrounding Area

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- 2.1 The application site, which has a site area of approximately 955 sqm, is located in the Brondesbury Park Ward within the administrative boundary of the London Borough of Brent. The site is a corner plot with frontages to Cavendish Road and Willesden Lane and adjoins residential properties to the east and a railway line to the south.
- 2.2 The Site itself is currently occupied by a four-storey residential building with a large rear garden area. The existing building has been converted into 13 x small, self-contained residential units which includes units within the basement and roof pitch. Each of these units fall well below the nationally described minimum space standards.
- 2.3 The Site also contains trees and shrubs of poor quality on the Willesden Lane frontage. One mature tree, located on the south-western corner of the site, is subject to a Tree Preservation Order (TPO).
- 2.4 The site benefits from a public transport accessibility level (PTAL) of 4 as it is well-served by a range of transport options. Brondesbury Park overground station is located approximately 350m (4-minute walk) to the southwest of the site, and Brondesbury overground station located 550m (6-minute walk) to the east of the site. Additionally, Kilburn underground station is located 650m to the northeast of the site (8-minute walk, and regular bus services operate from Willesden Lane and Brondesbury Park.
- 2.5 The site does not contain any listed buildings and is not located within a conservation area. There are also not listed buildings within the immediate vicinity of the site. However, it is noted that under the Proposals Map attached to the Council's Draft Local Plan (2019), the site falls within an area proposed to be a conservation area at a future stage.
- 2.6 According to the Environment Agency's Flood Map for Planning, the Site falls within Flood Zone 1, denoting the lowest risk of flooding.
- 2.7 There are not any locally or statutorily Listed Buildings within the Site.

### Relevant Planning History

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- 2.8 There is no relevant planning history for the site, however there are a number of relevant planning applications on surrounding sites that are contributing to change in the immediate area.

- 2.9 162 Willesden Lane is located immediately to the north of the site and planning permission was granted on 27 April 2020 under application reference 19/0834 for the redevelopment of the site to deliver a part four-storey, part five-storey residential building containing 18 flats. This site has similar characteristics as the subject site as it is situated on an underutilised corner plot with a large rear garden area, and it contains a poor-quality residential building with low quality flatted accommodation.
- 2.10 A recent Section 73 amendment application (LPA ref. 20/2041) was also approved for 162 Willesden Lane. This application would see the overall unit quantum increase to 22 flats and increase in height to 5-storeys across the building instead of part four-storeys and part five-storeys.
- 2.11 Fountain House, located at 159 Willesden Lane, is opposite the site to the west. Planning permission was granted on 30 March 2017 under application reference 17/0625 to demolish rear garages and the construction of two detached bungalows. This scheme is now under construction.
- 2.12 There are also a number of other recent applications within the vicinity of the site that are relevant to the emerging proposals. The planning history of nearby sites are also of direct relevance to this application are listed in the Table 2.1.

**Table 2.1 Surrounding Planning History**

<b>Reference</b>	<b>Address</b>	<b>Proposal</b>	<b>Decision and Date</b>
20/2041	162 Willesden Lane, Kilburn, London, NW6 7PQ	Variation of condition 2, development built in accordance with approved plans/documents to allow: 4 additional dwellings 5 storey building of Full Planning Permission reference 19/0834 dated 27 April, 2020, for demolition of existing residential building comprising 10 flats and construction of a residential block with associated car parking, cycle storage and landscaping.'	Granted 20 August 2021
19/0834	162 Willesden Lane, Kilburn, London, NW6 7PQ	Demolition of existing residential building comprising 10 flats and construction of a part 4-storey and part 5-storey residential block plus basement comprising 18 self-contained flats with associated car parking, cycle storage and landscaping.	Granted 27 April 2020
18/4486	196 Willesden Lane, Kilburn, London, NW6 7PR	Demolition of existing building and erection of one three and one four storey residential blocks providing 16 self-contained flats (5 x one-bed, 7 x two-bed and 4 x three-bed), with associated car and cycle parking spaces, landscaping and boundary treatment, Subject to a Deed of Agreement dated 27/02/2020 under Section 106 of the Town and Country Planning Act 1990, as amended	Granted 27 April 2020

<b>Reference</b>	<b>Address</b>	<b>Proposal</b>	<b>Decision and Date</b>
19/3056	13 The Avenue, London, NW6 7NR	Demolition of existing dwellinghouse and erection of a part-3 and part-4 storey development comprising 9 residential units with roof terraces, enlargement of vehicular access on Brondesbury Park and creation of vehicular access on The Avenue, provision of car and cycle parking, refuse storage, landscaping and subdivision of garden space.	Granted 20 March 2020
16/0674	Land next to Waverley Court, Brondesbury Park, Kilburn, London	Erection of a five-storey building with a lower ground floor to create 6 self - contained flats (6x2bed flats) with associated car and cycle parking spaces, bin stores and landscaping, on land next to Waverley Court, Brondesbury Park.	Granted 16 August 2016
15/3616	Former Manor School, 3-7 The Avenue, London, NW6 7YG	Hybrid planning application for full permission for demolition of all buildings and the development of 74 residential units (Use Class C3) comprising of 33 x 1 beds, 23 x 2 beds and 18 x 3 beds in a part three / part four / part five storey building fronting The Avenue with related basement car park comprising 57 parking spaces; and a 3 storey plus basement building fronting Christchurch Avenue, new vehicular access; footways; landscaping and associated works ("Phase 1"); and Outline permission for a school (Use Class D1), with new vehicular and pedestrian access from Brondesbury Park, with details of "appearance", "scale", 'layout' and 'landscaping' being reserved ("Phase 2") and subject to a Deed of Agreement dated 24 May 2015 under Section 106 of the Town and Country Planning Act 1990, as amended	Granted 24 May 2016
15/5068	24-51 INC, John Barker Court, 12-14 Brondesbury Park, Kilburn, London, NW6 7BW	Proposed demolition of existing block of flats known as 24-51 John Barker Court, and erection of part three, part four storey building comprising 33 self-contained flats (27 x 1 bed and 6 x 2 bed) with associated car parking (13 spaces), bin stores, amenity space and landscaping (as amended), and subject to a Deed of Agreement dated 15 February 2017 under Section 106 of the Town and Country Planning Act 1990, as amended.	Granted 17 February 2017

Reference	Address	Proposal	Decision and Date
15/1820	Garages rear of Weston House, Weston House, Winchester Avenue, Kilburn, London	Demolition of existing garages and community centre and the erection of a four storey building comprising 14 self-contained flats (3x1bed, 9x2bed and 2x3bed), new community centre (Use class D1) and a sub-station with associated car and cycle parking spaces, bin stores and landscaping	Granted 10 February 2016

### Pre-application consultation

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- 2.13 As part of the design development for the proposed development, the Applicant has engaged with officers at the Council via two formal pre-application meetings and a number of informal discussions and meetings. This process saw various design options tested and developed and the scheme amended to ensure it would comply with the Council's specific planning guidance.
- 2.14 Full details of the scheme evolution is contained within the Design and Access Statement, but the main principles and design changes that were established during pre-application consultation were:
- The principle of the demolition of existing buildings and the residential redevelopment of the site was agreed
  - The overall design approach to height, scale and massing was agreed
  - Design solutions to ensure an acceptable relationship to neighbouring properties on Cavenndish Road were agreed, which included reference to the Council's 9m and 45 degree line guidance
  - The overall approach to, and split between, private and community amenity space for the development was agreed
  - The location of the principal communal amenity space to the rear of the site, and the associated ramped access, was deemed appropriate
  - The retention of existing mature trees and the provision of new tree planting and landscaping was agreed
  - The residential design quality and internal layouts of the proposed units were adapted and evolved in consultation with officers, including the provision of duplex style units.

- The location of cycle parking and the provision of servicing from Willesden Lane was agreed as being appropriate.

2.15 These measures and design iterations as the result of this pre-application consultation have all collectively resulted in a scheme that the Applicant believes is a scheme that should now receive full support from the Council.

### **Community engagement**

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2.16 In addition to the engagement with planning officers through the pre-application process, the local community have also been engaged with.

2.17 Letters were sent out to adjoining properties of site as well as local ward councillors to provide details of the proposed development and provided details of the Applicant's representatives to discuss the development in detail. Queries were received from one property as part of this process and responses were provided.

### 3. PROPOSED DEVELOPMENT

- 3.1 This planning application seeks full planning permission for the demolition and redevelopment of the site to provide a new residential apartment building providing a total of 21 self-contained residential apartments.
- 3.2 The proposals would see a total of 1,915 sqm GIA of floorspace provided, a net increase of 1,471 sqm GIA as set out in Table 3.1.

**Table 3.1 Land Use Area Schedule**

<b>Land Use</b>	<b>Existing sqm (GIA)</b>	<b>Proposed sqm (GIA)</b>	<b>Net change sqm (GIA)</b>
Residential (Class C3)	449	1,915	+1,466
<b>Total</b>	<b>449</b>	<b>1,915</b>	<b>+1,466</b>

- 3.3 The 21 apartments would contain a mix of 1, 2 and 3-bedrom homes as set out in Table 3.2.

**Table 3.2 Residential Dwelling Size Breakdown**

<b>Unit Size</b>	<b>Number</b>	<b>Percentage</b>
1 bed	5	24%
2 bed	11	52%
3 bed	5	24%
<b>Total</b>	<b>21</b>	<b>100%</b>

- 3.4 As shown above, the proposed scheme provides a range of home sizes in accordance with the aspirations of the local plan as well as the London plan.
- 3.5 The Applicant has produced viability evidence that demonstrates that the proposed development cannot viably provide any affordable housing on site. No affordable housing dwellings are therefore proposed.
- 3.6 Each dwelling would be provided with its own private amenity space, with the overall quantum of private amenity space totalling 354 sqm. This equates to an average of 16.86 sqm per unit and exceeds the standards set out by the London Plan.

- 3.7 Two dedicated communal amenity areas would also be provided, including a communal roof terrace and a larger communal amenity area at the rear of the site at ground floor level. The total area of usable communal amenity is 102 sqm.
- 3.8 A detailed hard and soft landscaping scheme has also been developed for the proposals, which includes new planting along the perimeter of the site to improve the site's relationship to the public realm.
- 3.9 The proposed development incorporates cycle parking in accordance with the standards set out in the London Plan, with the servicing of the site occurring from Willesden Lane to ensure safe and efficient collection can occur.

## 4. PLANNING POLICY CONTEXT

4.1 The relevant Development Plan documents have been considered in detail in the preparation of the proposals at 66 Cavendish Road. This is summarised within the relevant sections below which highlights key national, regional and local planning policies which are considered relevant to the development proposals at this site.

4.2 The Development Plan for the borough forms the statutory basis for making planning decisions and consists of:

- Brent Core Strategy (2010)
- Brent Development Management Policies DPD (2016)
- The London Plan (2021)

4.3 There are also a number of other material considerations which must be considered in the determination of planning applications. Those of relevance to the proposals are reviewed below, including the National Planning Policy Framework, and relevant Supplementary Planning Documents.

### National Planning Policy

4.4 The current iteration of the National Planning Policy Framework (NPPF) (2019) was published on 24 July 2018 and subsequently updated on 19 February 2019 and most recently in July 2021. The revised Framework sets out the government's planning policies for England and how these are expected to be applied. The NPPF focuses specifically upon the delivery of sustainable development and it is a material consideration in planning decisions. Paragraphs of relevance to the proposals at 66 Cavendish Road are as follows:

4.5 **Paragraph 8** of the NPPF sets out the basis for the achievement of sustainable development in planning terms and sets out three key objectives in the planning system: economic, social, and environmental sustainability.

- An economic objective – to encourage a strong & competitive economy, by making sure that the right type of land is available in the right places to support growth and improved productivity, as well as coordinating the provision of infrastructure;
- A social objective – to support strong, vibrant and healthy communities, by making sure that a sufficient number and range of homes can be provided; and
- An environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land.

- 4.6 **Paragraph 10** identifies that to ensure sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development.
- 4.7 **Paragraph 60** states that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can be provided and that land with permission is developed without unnecessary delay.
- 4.8 **Paragraph 119** states that planning policies and decisions should promote an effective use of land in meeting needs for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. It also states that strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land.
- 4.9 **Paragraph 120c and 120d** states that that substantial weight should be given to the use and development of brownfield land and under-utilised land and buildings, particularly where it would help to meet identified needs for housing.
- 4.10 **Paragraph 124** states that planning decisions should support development that makes efficient use of land, taking into account: the identified need for different types of housing and other forms of development; local market conditions and viability; the availability and capacity of infrastructure and services; the desirability of maintaining an area's prevailing character and setting or of promoting regeneration and change; and the importance of securing well-designed/ attractive/ healthy places.
- 4.11 **Paragraph 126** discusses the creation of high-quality buildings and places. Good design is fundamental to what the planning process should achieve and is a key aspect of sustainable development. Being clear about design expectations is essential for achieving this.

## **Regional Planning Policy**

### **The London Plan (2021)**

- 4.12 The London Plan (2021) forms part of Brent's Development Plan meaning the policies within it are a material consideration in the determination of this application.
- 4.13 The London Plan seeks to address the acute shortage of housing across the capital, through encouraging intensification of housing delivery and mixed-use development on key brownfield sites, the document identifies that there's a need for 66,000 homes per annum in London, whilst the plan sets out a target to provide c. 52,000 new homes per annum. The document also sets out an expectation for all London Boroughs to achieve, and exceed, their relevant minimum borough housing targets. With regards to the LBB, the minimum ten-year target is set at 23,250 new homes

over the plan period (2019/20-2028/29), or, 2,325 new homes per annum. Relevant policies contained within the document are set out below.

- 4.14 **Policy D3** 'Optimising site capacity through the design-led approach' requires development to make the best use of land by following a design-led approach that optimises the capacity of sites.
- 4.15 **Policy D6** states that housing development should be of high quality design and provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.
- 4.16 **Policy GG2** 'Making the best use of land' the Plan seeks to enable the development of brownfield land. Sites which are well-connected by existing and planned public transport should be prioritised.
- 4.17 **Policy H1** also supports housing delivery on brownfield sites, especially those with a high PTAL of 3-6 or those within 800m of a station or town centre boundary.
- 4.18 **Policy H2 Part A** notes that there should be pro-active support for well-design new homes on small sites and that Brent Council should look to ensure that 4,330 new homes should be delivered on small sites between 2019/20-2028/29

### **Local Policy**

#### **Brent Core Strategy (2010)**

- 4.19 **Policy CP1** outlines Brent's spatial development strategy to concentrate housing growth in well located areas that provide opportunities for growth, creating a sustainable quality environment that will have positive economic impacts on deprived neighbourhoods that may surround them.
- 4.20 **Policy CP2** 'Population and Housing Growth' outlines the borough's aims for the delivery of 22,000 new homes between 2007 and 2026. It also states that 25% of new homes should be family (3 bedrooms or more).
- 4.21 **Policy CP6** 'Design and Density in Place Shaping' outlines support for higher densities in areas of good public transport accessibility in alignment with the London Plan.

#### **Brent Development Management Policies DPD (2016)**

- 4.22 **Policy BH1** 'Housing Supply' sets out the Council's target for delivering a minimum of 46,018 homes in the period 2019/20-2040/41.

- 4.23 **Policy BH5** 'Affordable Housing' states that the strategic affordable housing target that will apply is 50% of new homes in the period to 2041, and that the London Plan Policy H5 Threshold Approach to Applications will be applied as well as the affordable housing tenure split.
- 4.24 **Policy PH6** 'Housing Mix' outlines the Council's intention to maintain the previous CP2 target of 25% of new homes as family sized (3 bedrooms or more) dwellings.
- 4.25 **Policy DMP12** 'Parking' states that car free development should be considered for locations benefiting from high levels of public transport access, generally with PTAL 4 or above.
- 4.26 **Policy DMP15** 'Affordable Housing' outlines that 70% of new affordable housing provision should be social/affordable rented housing, and 30% intermediate housing at affordability levels meeting local needs.
- 4.27 **Policy DMP19** 'Residential Amenity Space' states that all new dwellings will be required to have external private amenity space of approximately 20sqm per flat.

#### **Supplementary Planning Documents (SPD)**

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##### **London Housing SPG (2016)**

- 4.28 The London Housing SPG was published in March 2016 following the publication of the Further Alterations to the London Plan. It provides guidance on a range of strategic policies including housing supply, residential density, and housing standards.

#### **Planning Reforms**

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- 4.29 In addition to the policy context outlined above, it is also worth noting that the Government has recently announced a number of key planning reforms and changes within the Planning White Paper, which was published on the 6<sup>th</sup> of August 2020. Furthermore, a number of amendments to the GDPO and Use Classes Order have also been announced, including the introduction of the new Use Class E that is encompassed in the Proposed Development.
- 4.30 The key drives within the White Paper and within the Government's changes to the GDPO and Use Class Order further emphasise the importance of housing delivery and increasing densities.

#### **Emerging Plans**

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- 4.31 Brent Council are currently consulting on their Draft Local Plan (2019), which also forms a material consideration for the project, albeit with a different level of weight attributed to it compared to the adopted policies.

- 4.32 Notable updates occurring through the Draft Local Plan are the housing targets outlined in Policy CP2 of the Core Strategy (2010) being increased by the Draft Local Plan (2019) to a minimum of 27,482 new homes between 2019/20 and 2028/29.
- 4.33 **Draft Policy BH4** of the Draft Local Plan (2019) notes that sites with PTALs of 3-6 are suitable for small housing developments and that they should be assessed in accordance with Policy H1 of the London Plan (2021).

## 5. PLANNING CONSIDERATIONS

5.1 This section assessed the Proposed Development against the statutory development plan and other material considerations.

### Principle of Development

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5.2 The Proposals seek to deliver 21 high quality new homes, the principle of residential development on the site is established through the national, regional, and local emphasis on providing an increased quantity and quality number of homes within London, as well as Policy E7 of the London Plan.

5.3 London Plan Policy GG2 'Making best use of land' seeks to enable the development of brownfield land. It is also identified that sites which are well-connected by existing and planned public transport should be prioritised for the delivery of homes. The Site is located in close proximity to Brondesbury Park and Brondesbury overground stations, as well as Kilburn underground station, making it a prime location for intensification of residential uses accordance with commitments to sustainability and transport access in Policy GG2 and H1 of the London Plan.

5.4 In addition, the proposed development would also result in the replacement of 13 existing flats on site that are well below national minimum space standards and within a building that is of minimal utility and energy efficiency. Replacing these existing homes with an increased number of homes that meet minimum space standards and of a varied mix shall ensure an overall net improvement and increase in residential accommodation on site.

5.5 It is therefore considered that through the delivery of a high-quality residential scheme to replace the existing residential accommodation that is far below the nationally described minimum space standards, is acceptable in principle and accords with the Development Plan.

### Housing Mix and Quality

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#### Housing Mix

5.6 The proposals provide a mix of homes suitable for the site's location, a mix of 1, 2, and 3-bedroom homes are proposed within the scheme ensuring there is a range of homes to meet different needs in the community. The breakdown of homes is provided in table 3.1 below:

**Table 5.1 Residential Dwelling Size Breakdown**

Unit Size	Number	Percentage
1 bed	5	24%

Unit Size	Number	Percentage
2 bed	11	52%
3 bed	5	24%
<b>Total</b>	<b>21</b>	<b>100%</b>

5.7 At a London wide level, London Plan Policy H10 - *Housing Size Mix* states that schemes should generally consist of a range of unit sizes and that applicants and decision-makers should have regard to a number of criteria including the delivery of mixed and inclusive neighbourhoods. It also identified that town centres, stations or highly accessible locations are more suitable for one and two bed homes. In light of this, given the site's sustainable location and proximity to underground and overground stations, together with the predominance of larger family homes in the wider area, the housing mix proposed seeks to deliver a mix of 1, 2 and 3-bedroom properties, with a significant proportion of these (48%) being provided as 2b4p and 3-bedroom properties which are suitable for families to occupy.

5.8 This mix of homes is also consistent with Policy CP2 of the Core Strategy, which notes that the Council target a minimum of 25% of new homes to be 3-bedrooms or greater.

5.9 In light of this, it is considered that the proposals would provide a range of unit sizes to meet a range of local needs, in accordance with the Development Plan.

#### **Residential Density**

5.10 As identified above, London Plan policy D3 – Optimising site capacity through the design-led approach – requires development to make the best use of land by following a design-led approach that optimises the capacity of sites.

#### **Quality of accommodation and amenity**

5.11 The sizes of the homes within the proposed development will meet or exceed the relevant space standards as set out in the London Plan Policy D6. Full regard has been had to all the relevant internal residential standards set out within the Housing SPG (2016), including all baseline and best practice standards.

5.12 Each of the proposed homes will also have access to good quality daylight sunlight ensuring the homes are of high quality. The Daylight and Sunlight Assessment, prepared by T16 Design, identifies that the proposed homes would all receive adequate levels of daylight and sunlight in line with the BRE guidance.

5.13 Each home will have access to private amenity in the form of balconies and terraces, which meets the requirements of the London Plan, in addition to the communal amenity area for the use of all

residents at the rear of the development. As shown in the Design and Access Statement as well as the Landscape design document, the design team have sought to deliver a range of high-quality amenity spaces for future residents that are functional and flexible.

- 5.14 The proposed development also includes two communal amenity areas for residents at roof level and at ground floor level at the rear of the site. Each of these areas are fully accessible and provide two diverse areas for future occupants to use.
- 5.15 Further information regarding the quality of the proposed homes is provided in the Design and Access Statement and the landscaping document which are submitted in support of this application.

## **Character and Appearance of the Proposals**

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### **Design Approach and Character**

- 5.16 The design of the scheme has evolved through pre-application discussions held with officers at the London Borough of Brent. Details of the design evolution and design rationale are included within the Design and Access Statement submitted in support of this application.
- 5.17 Significant attention has been paid by the design team to ensuring the proposals are of a distinct local character with particular focus given to the nature of the site being a prominent corner plot and being in keeping with the emerging scheme opposite at 162 Willesden Lane. It is considered that the quality of the proposed design approach has responded effectively to the site's surrounding context. The proposed new buildings will be of a high-quality architectural approach which has been designed so as to ensure it is in keeping with the local area.
- 5.18 Further details of the design approach underpinning the proposals is set out within the Design and Access Statement.

### **Heritage**

- 5.19 The existing site and buildings are not subject to any heritage designations. However, it is noted that the Draft Local Plan (2019) notes that the site is in an area where a future extension to the Brondesbury Conservation Area may or may not occur.
- 5.20 The Council have accepted that the proposed demolition and redevelopment of the site is acceptable during pre-application consultation. It was also confirmed that this potential extension to the Conservation Area is unlikely to be pursued within the next 5 years and therefore no weight can be afforded to this in determining this application.

## **Affordable Housing Statement**

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- 5.21 Planning policy at all levels acknowledges the importance of delivering affordable housing to ensure that housing is made available to all sections of society. Within London, the London Plan sets out a strategic target for all new housing to be 50% affordable. Policy H5 sets out a 'Fast Track' approach to the delivery of affordable housing, noting that if 35% affordable housing is provided on site, then no viability information is needed. At a local level, Policy CP2 of the Core Strategy and Policy DMP 15 of the Development Management Policies note a policy target of 50% affordable housing in line with the London Plan.
- 5.22 However, each of these policies acknowledge that due to individual circumstance of sites, the delivery of these affordable housing percentages in major developments may not be achievable. In these instances, Policy H5 of the London Plan and Policy DMP 15 of the Development Management Policies notes that the submission of robust viability evidence can be submitted to determine whether a development can afford to make an affordable housing contribution.
- 5.23 The Applicant, during the design development of the project, has worked closely with a Quantity and Chartered Surveyors in considering overall scheme viability. This analysis determined that the proposed development is unable to afford to make any affordable housing contributions, as any affordable housing contributions would render the scheme unviable.
- 5.24 As a result, a detailed Financial Viability Assessment has been submitted in support of this application. This would be subject to independent verification during the assessment of the application.

## **Neighbouring Amenity**

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- 5.25 A key design consideration for the proposed development has been maintaining the amenity of neighbouring properties, including immediate neighbours on Cavendish Road, and other properties along Willesden Lane.
- 5.26 Analysis of the how the development has considered both privacy and outlook, as well as daylight and sunlight levels is set out below.

### **Privacy and outlook**

- 5.27 The proposed development would see the current rear garden area accommodate a section of the new residential building. The design team have paid special regard to ensuring that this new mass would not result in any unreasonable impacts to the privacy, outlook and amenity of nearby properties, most notably 64 Cavendish Road. The Council's SPD 1 (2018) is their Design Guide, which includes a number of key design principles and standards that assist in ensuring appropriate relationships between buildings occurs.

- 5.28 One piece of guidance is to ensure that a minimum distance of 9m is achieved between front gardens and habitable rooms and balconies. The SPD also notes that the building envelope should also be designed with consideration of the 45 degree line, measured from the height of the common boundary wall between sites. In meeting these two standards, SPD 1 notes that an appropriate relationship between the two sites can be achieved.
- 5.29 The design of the proposed development complies with these two standards. The massing of the new residential building that fronts Willesden Lane has introduced setbacks that would see the building comply with the 45 degree line. In addition, the scheme has utilised angled and recessed windows on the rear elevation fronting the rear garden of 64 Cavendish Road. This reorientates the outlook of the proposed units to the rear of the site, away from the principal windows of 64 Cavendish Road.
- 5.30 There is a minor breach to the 45 degree line guidance, however this is limited to a very minor element of Core A of the proposed development. This breach is limited to the upper storeys and has been agreed with officers during pre-application consultation as being acceptable on balance.
- 5.31 The proposed development therefore complies with the key design guidance on privacy and outlook contained within SPD 1.

#### **Daylight and Sunlight**

- 5.32 In addition to confirming that the proposed homes within the scheme will receive adequate daylight internally, the Daylight Sunlight Report also assessed whether the proposals would have an impact on daylight and sunlight levels of neighbouring properties.
- 5.33 The analysis carried out included conducting the Vertical Sky Component (VSC) test for daylight, the Annual Probable Sunlight Hours (APSH) test for sunlight and overshadowing assessments of adjoining amenity space.
- 5.34 All windows tested passed the APSH sunlight test and all surrounding gardens would also receive adequate levels of direct sunlight on March 21, in line with BRE Guidance.
- 5.35 In terms of VSC, 51 out of 53 windows tested passed the VSC test as set out by the BRE. The two windows that failed are located on the side elevation at 64 Cavendish Road at lower ground floor level. The percentage reduction to these two windows are 27% and 32% against a target of 20%. These percentage reductions are considered to be minor to moderate.
- 5.36 There are a number of specific reasons why these minor to moderate impacts should be considered acceptable in the overall balance:

- The two windows are on the side elevation at lower ground floor level and currently look directly onto the side elevation of the existing building on site. This relationship will remain unchanged as a result of the proposed development.
- Due to their location and limited outlook, the current levels of daylight and VSC are already extremely low. The actual daylight loss to each window is 2%, but due to the current low levels of daylight, this manifests in a larger percentage reduction.
- The loss of 2% would unlikely result in any material change to the light in these rooms.
- The BRE Guidance notices that the results from VSC testing should be applied flexibly and notes that in urban locations such as where the site is located, flexibility should be afforded.
- The two windows in question would also pass the sunlight APSH test.

5.37 Overall, these daylight and sunlight results demonstrate a very high level of compliance with the BRE Guidance and is considered acceptable on balance.

### **Access, Parking and Cycle Parking**

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5.38 The proposed development would be car-free to ensure that sustainable methods of transport are utilised by residents over the reliance on private cars, which is compliant with policy requirements at local, regional and national levels. Additionally, this has been confirmed as acceptable in pre-application discussions with the Council, and has also been accepted in-principle as part of the approved development on the adjacent site at 162 Willesden Lane.

5.39 Whilst future occupiers will not be able to purchase parking permits for the Controlled Parking Zone adjacent to the Site, exemptions would be made for blue badge holders.

5.40 A total of 40 secure and sheltered long-stay cycle parking spaces are provided at the lower-ground floor, which is both easily accessible and convenient to ensure that cycling is promoted as part of the scheme. A large cycle lift is provided via Core A down to the lower ground floor cycle stores to ensure ease of access, and the layout of the cycle parking was re-designed in response to officer comments.

5.41 Access and servicing arrangements on site would change as a result of the development. The redundant crossover on Cavendish Road would be removed and access and servicing would occur via Willesden Lane. This is considered an improvement over the current scenario, as all servicing and deliveries would occur on Willesden Lane, which is more suited to deliveries and collection vehicles compared to Cavendish Road.

5.42 The Transport Statement submitted in support of this application concludes that the proposal is compliant with parking policy requirements, and that it will not result in conditions prejudicial to

highway capacity, road safety, or neighbouring amenity. Additional details relating to transport aspects of the proposals are available in the Transport Statement submitted in support of the application.

### **Landscaping and Urban Greening**

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- 5.43 The proposed development incorporates a comprehensive hard and soft landscaping scheme, which includes the planting of new trees, new shrubs, green roofs, green screens and permeable paving, all of which would ensure that the site has maximised its potential for urban greening.
- 5.44 The Urban Greening Factor score for the proposed development is 0.39, compared to a target score of 0.4. This is considered a very high level of compliance on site. Achieving an increased Urban Greening Factor score would come at the cost of private amenity space which would jeopardise the overall quality of the new residential homes. It is therefore considered that this score is acceptable.
- 5.45 Further details are provided within the landscaping information submitted with the planning application.

### **Sustainability and Energy**

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- 5.46 The proposed development has been designed to achieve high levels of energy efficient and sustainable design in line with the Energy Hierarchy set out by Policy SI 2 of the London Plan. Policy SI 2 sets out an objective for new major developments to achieve a zero carbon outcome.
- 5.47 The Energy and Sustainability Statement confirms that the various design measures in the scheme would see the development achieve a reduction of at least 43.4% in carbon dioxide emissions through efficient fabric design and low carbon heating. A further 21.4% reduction through the use on-site renewable energy generation through PV panels is also achievable. This results in a total reduction in carbon dioxide emissions of 55.5% compared within the Building Regulations 2013.
- 5.48 A carbon offset contribution would be used to offset the shortfall in achieving a zero carbon outcome.
- 5.49 Further details, including detailed SAP calculations and overheating analysis, is provided within the Energy and Sustainability Statement.

### **Flood risk and drainage**

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- 5.50 The site is located in Flood Zone 1 and has a low probability of flooding. Notwithstanding, a detailed Flood Risk Assessment and Drainage Strategy has been prepared in support of the proposed development. The Assessment concludes there are no significant flood risks to the Proposed Development, nor does the Proposed Development increase the flood risk up or downstream.

- 5.51 Additionally, it sets out a number of measures, including the use of green roofs, in ensuring that surface water runoff from site is appropriately managed.

### **Air Quality and Noise**

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- 5.52 The Air Quality Assessment submitted with this application confirms that the air quality impacts in the operation phase of the development were not predicted to be significant. It also found that the use of good practice control measures in the construction phase would provide suitable mitigation for the development to reduce potential air quality impacts to an acceptable level. The Air Quality Assessment also concluded that the development is considered to be air quality neutral, and thus in compliance with the London Plan air quality neutral requirements.
- 5.53 A Noise Impact Assessment was carried out to determine the daytime and night-time noise emission criteria for the installation of heat pump units, in alignment with LBB's planning validation requirements. The Assessment concludes that noise emission from the heat pump unit installation meet the LBB's requirements for plant noise emission, providing that mitigation measures outlined in the assessment are implemented.

### **Basement**

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- 5.54 A Basement Impact Assessment was carried out accordance with the guidelines set in the Brent Basement SPD (2017). The Assessment found that the basement included in the proposed development is not considered to adversely affect groundwater flow, surface flow or flooding due to the low permeability of the London Clay Formation underlying the Site. Overall, it concluded that the impact of the basement is considered to be low.

### **Trees**

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- 5.55 There are several trees on Site, some of which are covered by a Tree Preservation Order known to exist on site. Therefore, a Tree Survey and Impact Assessment has been submitted with this planning application to consider the proposal in relation to nationally adopted guidance '*BS5837:2020 – Trees in relation to design, demolition and construction – Recommendations*'.
- 5.56 The Tree Survey and Impact Assessment concludes that the proposed development results in the loss of only low quality and value trees that are not of sufficient merit to constrain the development of the Site. Additionally, whilst the walkway included within the proposed development lies within the root protection area of a retained tree, the assessment states that measures can be deployed to minimise harm.

- 5.57 Additionally, new and replacement tree planting is included in the proposal, which the report concludes would provide a diverse portfolio of tree cover to ensure the sustainability of green infrastructure on the Site in the future.
- 5.58 Overall, the proposed development recognises the significant contribution that trees make to the character and quality of urban environments, and their role in mitigating and adapting to climate change. Hence, the proposals seek to retain existing trees on site and provide new ones in alignment with national planning policy requirements.

### **Ecology**

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- 5.59 A Preliminary Ecological Assessment has been prepared in support of the application, and considered whether the proposed development would have any impact on ecology and also identified a number of ecological enhancements that can be delivered.
- 5.60 The Assessment concluded that the proposed development would be acceptable in ecological terms, and suggested a number of measures that would need to be complied with before works commence and also a number of enhancements that have been incorporated into the landscaping design.
- 5.61 It is anticipated that the recommendations within the Preliminary Ecological Assessment would be secured by an appropriately worded planning condition.

### **Fire Statement**

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- 5.62 A fire safety engineer has been involved in the preparation of the proposals and has advised the architects on safety features throughout the drafting of the scheme.
- 5.63 The Fire Statement submitted in support of the application assesses the proposed development against the primary fire safety objectives as stipulated under Policies D12A, D12B, and D5(B5) in the London Plan. The Statement confirms that the proposed development can comply with the relevant fire safety requirements and is therefore acceptable.

## 6. CONCLUSION

6.1 The proposed development at 66 Cavendish Road, Brent, involves the demolition of the existing structures and the development of high quality residential building, delivering a total of 21 residential units. In summary, the proposals are able to deliver the following key benefits:

- The delivery of a new purpose-built residential development in a sustainable location
- The delivery of much needed new housing for the borough, including the provision of a range of housing sizes, including 1, 2 and 3 bedroom homes suitable for a range of households, including families
- The delivery of a high-quality architectural building that responds to the site's context as a corner site, the recently approved development at 162 Willesden Lane and the prevailing character of the local area
- The provision of extensive areas of private and communal amenity space for occupants of the development
- The removal of low quality trees and the replacement with new, native tree species along the frontage of the site
- The removal of redundant vehicle crossovers and the provision of new high quality streetscape planting to the benefit of the local townscape and streetscape
- The delivery of a sustainable and energy efficient building that utilised energy efficient building fabric, green roofs and PV panels
- The delivery of a car free development with high levels of cycle parking, helping contribute to sustainable transport to and from the site.

6.2 As set out within this Planning Statement, the proposed development accords with the principles identifies in local, regional, and national policy and has been assessed as being in accordance with the Development Plan. We therefore respectfully request that the planning application is approved and granted planning permission.