

## Local List – Further information on requirements

Guidance notes on the Validation Requirements set out in the Local Validation Lists are provided within the following table.

<b>Affordable Housing Statement</b>
<p>The statement should include:</p> <ul style="list-style-type: none"> <li>• the number of units</li> <li>• the mix of units with numbers of habitable rooms and habitable floorspace</li> <li>• if different levels or types of affordability or tenure for different units are proposed, this should be clearly explained</li> <li>• details of any Registered Providers acting as partners in the development.</li> </ul> <p>Brent's Local Plan sets out affordable housing requirements in policies CP 2 Population and Housing Growth, DMP 14 Employment Sites and DMP 15 Affordable Housing. These set out a 50% target and a requirement for the maximum reasonable amount of affordable housing to meet this target. The Mayor adopted the Affordable Housing and Viability Assessment Supplementary Planning Guidance (SPG) in August 2017. This outlined his interpretation of how Existing London Plan Policy 3.11 Affordable Housing Targets and Policy 3.12 Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes should be implemented.</p> <p><u>Financial Viability Appraisal – 50 % Affordable Housing</u></p> <p>Applications that meet or exceed 50 per cent affordable housing provision (measured by habitable rooms) and provide affordable housing on-site, meet Brent's policies on the tenure mix (70 per cent social rent or affordable rent below LHA rates and 30 per cent intermediate) and other planning requirements and obligations to our satisfaction are not required to submit viability information. Such schemes will be subject to an early viability review, but this is only triggered if an agreed level of progress is not made within two years of planning permission being granted.</p> <p><u>Financial Viability Appraisal - Viability Tested Route</u></p> <p>Schemes which do not meet the 50 per cent affordable housing threshold will be required to submit detailed viability information which will be scrutinised by Brent, and where relevant the Mayor, and treated transparently. Where Brent or the Mayor determines that a greater level of affordable housing could viably be supported, a higher level of affordable housing will be required which may exceed the 50 per cent threshold. In addition, early and late viability reviews will be applied to all schemes that do not meet the threshold in order to ensure that affordable housing contributions are increased if viability improves over time. The FVA will typically assess the residual value of the scheme to determine the maximum reasonable amount of affordable housing the scheme can deliver, and provide detailed information on a number of supporting financial assumptions including but not limited to:</p> <ul style="list-style-type: none"> <li>• Land value</li> <li>• Build costs, including any infrastructure and abnormal costs</li> <li>• Residential sales values, including ground rents and parking spaces</li> <li>• Commercial sales values</li> <li>• Developer profit</li> <li>• Affordable housing assumptions</li> </ul>

- Development and other fees
- Finance costs and interest charges
- Contingencies
- Planning obligations
- LB Brent and Mayoral CIL
- Development strategy including construction phasing and sales periods
- Growth assumptions and sensitivity analysis

For small to medium sized single phase development schemes the GLA Affordable Housing Toolkit and ARGUS developer are recognised FVA tools, however for larger multi-phase development schemes a bespoke FVA may be required. All FVAs should be accompanied by a fully working, testable and editable electronic/software model which explicitly shows the calculations and assumptions used in the planning application. We will accept alternative models provided they explicitly show the calculations and can be fully interrogated and the inputs varied.

The applicant will also be expected to underwrite the Council's reasonable costs in commissioning an independent assessment of the FVA.

Increasing transparency for residents - The affordable housing statement and viability information will be published on the Brent website along with all other documents submitted as part of the planning application.

If you consider that the financial information is sensitive and should not be disclosed then you must submit an additional statement titled 'Affordable Housing Viability Information – Exceptional Circumstances' detailing why you consider the information should not be disclosed. In this additional statement you should set out exactly what material you consider should be withheld alongside full justification for doing so. Simply stating that the submitted information is confidential and commercially sensitive and so should not be published, and be exempted from disclosure under the Freedom of Information Act 2000 and Environmental Information Regulations 2004, is not full justification.

The affordable housing statement and viability information will then not be published on the Brent website until the 'Affordable Housing Viability Information – Exceptional Circumstances' statement has been reviewed by the Council.

The Council will allow for exceptions to full disclosure in limited circumstances and only when the disclosure of an element of a viability assessment would cause harm to the public interest to an extent that is not outweighed by the benefits of disclosure. Please note that it is anticipated that there would be very few exceptions

#### **Air Quality Assessment**

An Air Quality Assessment must include:

- an assessment of the existing air quality in the area
- details of potential pollutant sources as a result of the proposed development during both construction and operational phases
- details of the pollutants that may be emitted and which objectives they may impinge on.
- an assessment of the impact of these, including likely emissions and the effect on the existing air quality. The concentrations of the various pollutants should be predicted at suitable receptor locations. This should include a comparison of with

<p>and without development scenarios for the first year of the proposed occupation of the development.</p> <ul style="list-style-type: none"> <li>an identification of measures to mitigate and minimise any impacts, with the suggested mitigation measures incorporated into the building design in the planning application is submitted.</li> </ul>
<b>Air Quality Neutral Assessment</b>
<p>The assessment must demonstrate compliance with Policy 7.14 of the London Plan. The assessment must be written in accordance with GLA guidance, and shall include details of emissions for both buildings and transport.</p>
<b>Archaeological impact statement</b>
<p>Where development is proposed for a site which includes or has the potential to include heritage assets with archaeological interest, developers must submit an appropriate desk-based assessment and, where necessary, a field evaluation.</p>
<b>Basement impact assessment</b>
<p>This shall include:</p> <ul style="list-style-type: none"> <li>Site Survey (All basement applications. To include photographs of existing site);</li> <li>Tree/Arboriculture Report (Where the proposal is in proximity to trees within site, on adjoining sites or street trees);</li> <li>Landscaping Assessment (Where a basement development will impact on a garden);</li> <li>Heritage Statement (Where the application is for or impacting on a heritage asset, including a conservation area, listed or locally listed building, registered park or garden);</li> <li>Archaeological Survey within Archaeological Priority Areas and Sites of Archaeological Importance. (see policies map);</li> <li>Flood Risk Assessment and Drainage Strategy (Where proposal is in flood risk zone 2 or 3 (see Environment Agency flood zone map), or where there are localised flooding issues);</li> <li>Land Contamination Assessment (Where there is a risk of contamination);</li> <li>Noise Assessment (Where external plant is proposed or internal plant requiring external ventilation).</li> </ul>
<b>Community Infrastructure Levy (CIL) additional information form</b>
<p>Brent Community Infrastructure Levy (CIL) was introduced on 1 July 2013. Brent is also a Collecting Authority for the Mayor of London's CIL which was introduced from 1 April 2012.</p> <p>A completed CIL form must be submitted:  <a href="https://ecab.planningportal.co.uk/uploads/1app/forms/cil_questions.pdf">https://ecab.planningportal.co.uk/uploads/1app/forms/cil_questions.pdf</a></p> <p>Guidance is provided on the following page:  <a href="http://www.planningportal.gov.uk/uploads/1app/cil_guidance.pdf">http://www.planningportal.gov.uk/uploads/1app/cil_guidance.pdf</a></p>
<b>Contaminated land survey</b>
<p>Applications may also need to be accompanied by a land contamination assessment which should include an extended assessment of contamination in line with National Planning Policy Framework.</p> <p>Sufficient information should be required to determine the existence or otherwise of contamination, its nature and the risks it may pose and whether these can be satisfactorily reduced to an acceptable level.</p>

Where contamination is known or suspected or the proposed use would be particularly vulnerable, the applicant should provide such information with the application as is necessary to determine whether the proposed development can proceed.
<b>Daylight / sunlight assessment</b>
A daylight and sunlight assessment must be undertaken by a suitably qualified professional using the relevant BRE guidelines and criteria.
<b>Demolition plan (at a recognised metric scale)</b>
A plan showing the areas for demolition (marked in red)
<b>Drainage Strategy</b>
The Drainage Strategy could be separate to or part of a Flood Risk Assessment. The Joint West London Level 1 Strategic Flood Risk Assessment (SFRA) webmap and webpage includes further guidance and a Drainage Strategy submission checklist.
You can access the SFRA using this link: <a href="http://westlondonsfra.london">http://westlondonsfra.london</a>
<b>Digital Model of Proposal</b>
A three dimensional computer generated model in a format to be agreed with the Local Planning Authority. The model must be geo-located in Ordinance Survey space, in meters (m) units. The model is intended for the evaluation of massing and should not a large-set BIM model with full structural information. Please contact the Planning Authority for further information regarding requirements
<b>Ecological assessment / protected species survey</b>
Where a proposed development may have possible impacts on wildlife and biodiversity (e.g. proposals affected or within a S.S.S.I, Site of Importance for Nature Conservation, Wildlife Corridor or S.S.S.I.), information should be provided on existing biodiversity interests and possible impacts on them to allow full consideration of those impacts. Where proposals are being made for mitigation and/or compensation measures information to support those proposals will be needed.
Where appropriate, accompanying plans should indicate any significant wildlife habitats or features and the location of habitats of any species protected under the Wildlife and Countryside Act 1981, the Conservation (Natural Habitats etc) Regulations 1994 or the Protection of Badgers Act 1992. Applications for development in the countryside that will affect areas designated for their biodiversity interests are likely to need to include assessments of impacts and proposals for long term maintenance and management.
This information might form part of an Environmental Statement, where one is necessary. Certain proposals which include work such as the demolition of older buildings or roof spaces, removal of trees, scrub, hedgerows or alterations to water courses may affect protected species and will need to provide information on them, any potential impacts for them and any mitigation proposals for such impacts.
Government planning policies for biodiversity are set out in the National Planning Policy Framework.
<b>Employment Land Assessment</b>
For Strategic Industrial Location or Locally Significant Industrial Sites the Assessment shall demonstrate there is no reasonable prospect of an application coming forward on the site for uses in the B Use Class or a closely related Sui Generis Use. Evidence should include, but is not limited to, robust viability testing and market analysis, taking into account the latest Brent Employment Land Demand Study.
For Local Employment Sites the Assessment shall demonstrate either:

- a) the Local Employment Site is not viable for continued employment use as it is vacant and a thorough marketing exercise at realistic prices for the area has been sustained over a 24 month period; or
- b) redevelopment or re-use of a Local Employment Site for mixed-use development would accommodate the existing employment use, or provide Managed Affordable Workspace to a specification agreed by a Managed Workspace Provider; and wider regeneration benefits would be achieved for the community.

For detailed guidance refer to Development Management Policy 14 and supporting text: [www.brent.gov.uk/dmp](http://www.brent.gov.uk/dmp)

#### **Energy statement**

The assessment should demonstrate how the development will contribute towards energy and carbon reduction targets in accordance with London Plan Policy. It should be produced in accordance with the GLA's guidance on preparing energy assessments.

#### **Flood risk assessment**

The Joint West London Level 1 Strategic Flood Risk Assessment (SFRA) webmap and webpage (hyperlinked) is the evidence base for ensuring development is steered away from areas identified most at risk from various flood sources, reducing the risk of flooding to its residents and buildings. It provides a strategic overview of all forms of flood risk throughout the study area, now and in the future.

The Strategic Flood Risk Assessment sets out a checklist of what to include in a FRA. You can access the SFRA using this link: <http://westlondonsfra.london/checklists/>

#### **Foul sewage and utilities assessment**

The submission should demonstrate that:

- following consultation with the service provider, the availability of utility services has been examined and that the proposals would not result in undue stress on the delivery of those services to the wider community
- that proposals incorporate any utility company requirements for substations, telecommunications equipment or similar structures that service routes have been planned to avoid as far as possible the potential for damage to trees and archaeological remains
- where the development impinges on existing infrastructure the provisions for relocating or protecting that infrastructure have been agreed with the service provider.

#### **Heritage statement**

A Heritage Statement is required where a proposal is for or affects a heritage asset. It must describe and demonstrate a clear understanding of the significance of any heritage assets affected by proposals and the impact on their significance, including any contribution from their setting. The level of detail must reflect the importance of the asset and clearly identify the potential impact of the proposal

#### **Lighting assessment**

Details of external lighting and the proposed hours when the lighting would be switched on should be submitted.

These details shall include a layout plan with beam orientation, details of horizontal and vertical illumination including light levels and a schedule of the equipment in the design.

The assessment should also demonstrate compliance with 'Guidance notes for the reduction of obtrusive light GN01:2011', (The Institution of Lighting Professionals, 2012).

### **Noise and/or vibration impact assessment**

The assessment must include:

- an assessment of the existing background noise/vibration level over a 24 hour period ;
- predicted noise/vibration levels; and
- identification of any acoustic mitigation required to meet the required levels or provide the necessary protection.

The report must be undertaken by a suitably qualified acoustician. The assessment should demonstrate compliance and make reference to relevant British Standards and World Health Organisation (WHO) guidelines.

### **Planning statement**

A planning statement identifies the context and need for a proposed development and includes an assessment of how the proposed development accords with relevant national, regional and local planning policies.

It may also include details of consultations with the local planning authority and wider community/statutory consultees undertaken prior to submission (also see Statement of Community Involvement).

### **Plans and drawings or information necessary to describe the subject of the application (or indicative drawings in the case of an outline application where the relevant matters are reserved)**

Including:

- Block plan of the site (normally at a scale of 1:100 or 1:200)
- Existing and proposed elevations (normally at a scale of 1:50 or 1:100)
- Existing and proposed floor plans (normally at a scale of 1:50 or 1:100)
- Existing and proposed site sections and finished floor and site levels (normally at a scale of 1:50 or 1:100)
- Roof plans (normally at a scale of 1:50 or 1:100)
- For the replacement of doors or windows, existing and proposed detailed window elevations (normally at a scale of 1:10) and cross sections (normally at a scale of 1:5) showing all features of the windows
- For proposed vehicular accesses or new hardstandings, detailed site layout and elevation plans (normally at a scale not less than 1:100) showing all accesses and changes to the garden or land affected by the proposal.

The scale shown on the submitted plan(s) must state the paper size at which the scale applies, e.g. scale 1:100 at A3.

All submitted plans and drawings are recommended to have written dimensions and a scale bar.

This information is required to avoid errors and misinterpretation due to variations and accuracy.

### **Retail Impact Assessment**

This should include assessment that demonstrates:

- That all in-centre and edge of centre options have been assessed for their availability, suitability and viability and the proposal cannot be reasonably accommodated in these locations;
- the impact of the proposal on existing, omitted and planned public and private investment in a centre or centres in the attachment area of the proposal; and

<ul style="list-style-type: none"> <li>the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made.</li> </ul>
<b>Servicing and refuse management plan</b>
<p>The statement should include details of waste and recycling storage locations and capacity, accessibility for refuse collection vehicles and servicing vehicles, and access for emergency vehicles such as fire appliances where applicable.</p>
<b>Site plan</b>
<p>The site plan should be drawn at a scale normally of 1:500 or 1:200 and should accurately show:</p> <ul style="list-style-type: none"> <li>the direction of north</li> <li>the proposed development in relation to the site boundaries and other existing buildings on the site</li> <li>all the buildings, roads and footpaths on land adjoining the site including access arrangements</li> <li>any public rights of way crossing or adjoining the site</li> <li>the position of all trees on the site, and those on adjacent land that could influence or be affected by the development</li> <li>the extent and type of any hard surfacing</li> <li>boundary treatments including walls or fencing where this is proposed.</li> </ul>
<b>Site survey</b>
<p>The site survey is to record existing ground levels and landscaping on the site and on adjoining boundaries. It should include: levels - across the site (front to back and side to side) as well as that of adjoining property; established landscaping and any significant other planting including tree canopies and root areas; Photographs of the existing site; details of areas of existing hard and soft landscaping.</p>
<b>Statement of community involvement</b>
<p>The Government's National Planning Policy Framework emphasises the importance of planning applicants carrying out community engagement on their emerging proposals and states:</p> <p><a href="https://www.brent.gov.uk/localplan">https://www.brent.gov.uk/localplan</a></p> <p>'Applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Proposals that can demonstrate this in developing the design of the new development should be looked on more favourably.'</p> <p>Applications are to be supported by a statement setting out how the applicant has complied with the requirements for pre-application consultation set out in the local planning authority's adopted statement of community involvement and demonstrating that the views of the local community have been sought and taken into account in the formulation of development proposals. The level of detail provided should reflect the scale of the development.</p>
<b>Sustainability statement including BREEAM pre-assessment</b>
<p>The Sustainability Statement should demonstrate that the development will accord with Brent Local Plan and London Plan policies relating to sustainability and should include a BREEAM pre-assessment.</p>
<b>Townscape / visual impact assessment</b>



The Townscape and Visual Impact Assessment should examine the significance of change in the character of a townscape and whether it is positive or negative and should be undertaken by suitably qualified individuals who are members of the relevant professional body.

#### **Transport Assessment, including Travel Plan**

The National Planning Policy Framework advises that a Transport Assessment (TA) or Transport Statement (TS) should be submitted as part of any planning application where the proposed development has significant transport implications.

The coverage and detail of the TA should reflect the scale of the development and the extent of the transport implications of the proposal.

For smaller schemes the TS should simply outline the transport aspects of the application, while for major proposals, the TA should illustrate accessibility to the site by all modes of transport, and the likely modal split of journeys to and from the site.

It should also give details of proposed measures to improve access by public transport, walking and cycling, to reduce the need for parking associated with the proposal, and to mitigate transport impacts.

Further guidance is available at: <http://www.tfl.gov.uk/info-for/urban-planning-and-construction/>

Further advice regarding Travel Plans is available in "Travel planning for new development in London" by Transport for London.

#### **Tree survey / arboricultural impact assessment**

Information will be required on which are to be retained and on the means of protecting these trees during construction works.

The scope and degree of detail necessary in a tree/ arboricultural survey will vary according to the particular circumstances of each application, but usually consist of a site location plan showing their position and number, stating the diameter and species and indicate whether tree or hedge is for removal, pruning or protection. Information will be required on the means of protection during construction works.

For major developments, or where significant impact is occurring to existing trees/ hedges this information should be prepared by a qualified arboriculturist. This should be carried out in accordance with BS:5837.

#### **TV / Radio Reception Assessment**

An assessment of the likely impact of the proposed development on TV and radio reception of surrounding premises.

#### **Ventilation / extraction statement**

Details of the position and design of any equipment shall be provided, including predicted noise levels and any noise and/odour abatement measures.

#### **Wind microclimate assessment**

An assessment of the impact of the proposed development on the local wind microclimate. This report will normally be expected to summarise the findings of testing to demonstrate the degree of change in conditions associated with the proposed development.