

Application No:	Consultees Name:	Received:	Comment:	Response:
2022/3578/P	Agnes	11/10/2022 22:50:20	COMNOT	<p>While the planning application is in principle an improvement of the arches and is welcome, there are some important matters that should be secured via planning conditions and/or S106 agreements.</p> <p>1- Business space affordability. The current arches, despite not being officially designated as “affordable” workspaces, de facto currently provide affordable spaces for local businesses. The rent on arches is currently at around £18000 per annum. Kilburn is lacking in affordable business spaces and thus a percentage of the units (20%?) should be secured as affordable work spaces via a S106 agreement, to provide some affordable working spaces that Kilburn desperately needs.</p> <p>2. Active Frontages. The beginning of Maygrove Road, by the junction with Kilburn High Road suffers from high levels of anti-social behaviour. 2C Maygrove Road has provided an active frontage for years. Sadly the plan is to change this unit into a bin store, therefore removing an active frontage, that is critical for reducing anti social behaviour by natural surveillance. Plans should be reviewed to keep an active frontage at this location.</p> <p>3. Businesses opening hours. Opening hours of businesses should be clearly defined as part of the planning permission. Currently the site operates between 8am and 6pm week days, 8am to 1pm Saturdays and no work on Sundays. I would suggest opening hours to be limited to 8am to 10pm all days as a condition. This is to prevent excessive noise disturbance to neighbouring residential properties.</p> <p>4. Gated access to the site: Great to see that TFL have taken on board residents comments to add gates to the site. The planning conditions should include times at which the gates can open and should be closed, especially for the gates leading into Maygrove Road and Loveridge Road, that are very near to residential properties and are in areas prone to anti social behaviour. The conditions for the gates opening and closure on Kilburn High Road could be more lenient. Would suggest that the gates on Maygrove Road and Loveridge Road opening time should not be earlier than 8am in the morning and closure no later than 8pm in the evening. This would reduce noise levels for neighbouring properties to an acceptable level and still allow the use of the site via the Kilburn High Road entrance.</p> <p>5. Mix of use in the business units: a varied mix of uses for the units should be secured within the planning permission. Kilburn High Road is already full of cafes and restaurants and thus the Cafe/Restaurant uses should be limited to a maximum of 2 units, to protect the viability of other businesses on the High Road and to ensure the new arches offer the community uses that the planning application aims to supply. There should be a strict condition that take-away or dark kitchen are not permitted to avoid the proliferation of motorbike delivery drivers on our residential roads.</p> <p>6. Use of the yard at the back of arch 14: The planning documents do not define a use for this yard that backs onto residential properties back gardens. A planning condition should be that the yard cannot be used for commercial purposes until a new planning application is made with details of planned use. This is to protect residential properties from noise. The current yard can of course be improved and be used to locate the power substation, and heating system in the mean time.</p> <p>7. Pigeons proofing: A large plaza will effectively be located under bridges on the Kilburn High Road side. TFL have shown, that they have not taken pigeons proofing seriously as can be observed in the vicinity of Kilburn station. A planning condition should guarantee that the bridges are pigeon proofed and that this pigeon</p>

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proofing is inspected and maintained at least once a year. This would aim to improve the pedestrian environment at the top of Kilburn High Road.

8 Business waste: a clear planning condition should be that business waste is stored on site, ie not on the public highway. Kilburn already have significant issues with business waste disposal. At Kilburn station, there are no business waste storage facility and businesses clutter the pavement with their waste. This should be avoided in the arches.

9 Business Parking Permits: Currently all business parking is on site, in front of the arches. The new site will not provide spaces for business parking. A S106 agreement should be put in place to prevent the occupiers of the arches to get on street parking permits unless they can prove that a vehicle is essential to their operation. This is to protect residents parking in the area, that is already very much overstretched.

10. Designing out crime: The Police designing out crime unit should be fully consulted on this planning application. As previously mentioned, this area is prone to anti social behaviour and there are design features that will probably help increase anti social behaviour, like the recessed area between the bike racks and the gate on the Kilburn High road side. Lighting by the entrances to the site need to be effective and maintained.

11. Fire access: Fire access procedures should be reviewed as access, currently proposed via Kilburn High Road, will be limited because of the bollards on the pavement. The bollards are essential as they prevent cars from mounting the pavement to park.

Hoping some of these conditions can be taken into consideration.
